Draft Environmental Impact Report

Volume I

Metropolitan Transportation Authority West Los Angeles Transportation Facility *AND* Sunset Avenue Project

(EIR 2004-1407)
(SCH No. 2003121036)
(SCH No. 2004031139)

October 2004

PCR

Draft Environmental Impact Report

Volume I

Metropolitan Transportation Authority West Los Angeles Transportation Facility

AND

Sunset Avenue Project

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I. Summary

I. SUMMARY

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this Environmental Impact Report (EIR) begins with a brief summary of the proposed actions and its consequences. More detailed information regarding the project and its potential environmental effects are provided in the following sections of this EIR. Please refer to the Table of Contents for guidance.

A. PROPOSED PROJECT

This Draft EIR has been prepared to address the environmental impacts of both the West Los Angeles Transportation Facility and the Sunset Avenue projects. This decision between Metro and the City of Los Angeles has been made since proposed development of each site is related to the other site. Specifically, while approval decisions regarding the two projects are not necessarily tied together, both projects are related to a relocation of the existing Division 6 transportation facility currently located at the Sunset Avenue site. Upon completion of the West Los Angeles Transportation Facility, a new, larger, state-of-the-art facility for Compressed Natural Gas (CNG) buses proposed along Jefferson Boulevard, Metro has committed to relocate all service lines, employees, and administrative functions performed out of the antiquated Division 6 property in Venice. Completion of the West Los Angeles Transportation Facility and removal of the existing Division 6 facilities would then result in the reasonably foreseeable development of the Sunset Avenue property. Thus, this Draft EIR analyzes both the potential individual and combined impacts of the West Los Angles Transportation Facility and the Sunset Avenue projects.

1. West Los Angeles Transportation Facility

The project consists of a state-of-the-art fleet transportation center from which to operate a fleet of up to 175 CNG-powered buses and provide improved public transit service in the central and western areas of Los Angeles County including large portions of the City of Los Angeles (including the communities of West Adams, Mid-City and South L.A., etc.) and the incorporated cities of Beverly Hills, Culver City, Malibu, Santa Monica, and West Hollywood. Relocation of existing operations at Division 6 in Venice to this location in the West Adams-Baldwin Hills-Leimert Community of the City of Los Angeles would allow the Los Angeles County Metropolitan Transportation Authority (Metro) to improve service from a more centralized location in response to growing ridership. Development of the transportation facility

on the 4.66-acre site would provide Metro with new administration and maintenance facilities. These facilities would include approximately 53,120 square feet in a primary Administration/Maintenance building with up to 14 High-Bays (for bus maintenance, repair and inspection), as well as office, storage, shop and staff support uses. In addition, there would be several auxiliary facilities including a bus washing and fueling area (approximately 10,400 square feet), inspection bay (approximately 4,900 square feet), chassis wash area (approximately 1,700 square feet), facilities maintenance area (approximately 700 square feet) and trash/recycling area (approximately 1,100 square feet). The facility would also provide up to 175 surface level bus parking spaces and up to 240 employee parking spaces on a grade separated parking deck.

2. Sunset Avenue Project

The project site is in the Venice Community of the City of Los Angeles. Following the completion of Metro's new West Los Angeles Transportation Facility, the existing Division 6 facility which presently occupies the project site would be permanently vacated by Metro. The existing structures, consisting of approximately 15,300 square feet of floor area, would be removed and any contamination associated with the site's previous use remediated. A mixed-use development is proposed to replace the Division 6 facility, which would consist of a maximum of 225 residential condominiums in addition to approximately 10,000 square feet of retail space. The retail component is proposed in a ground floor setting to be occupied by café, retail, and health club uses. Included in the project, are two levels of subterranean parking that would provide approximately 676 parking spaces. Residential vehicular ingress and egress is proposed via Sunset Avenue. Business patrons and delivery vehicles would ingress and egress via Main Street.

B. OVERVIEW OF THE PLANNING CONTEXT

The Los Angeles County Metropolitan Transportation Agency (Metro), Lead Agency for the West Los Angeles Transportation Facility project, determined that an Environmental Impact Report (EIR) would be required to evaluate the potential impacts of the project. As a result of this determination, a Notice of Preparation (NOP) of an EIR was distributed for the West Los Angeles Transportation Facility in December 2003. In accordance with the California Environmental Quality Act (CEQA), the purpose of the NOP was to request and obtain input from interested and responsible public agencies and members of the public at large regarding the scope and content of the EIR. A Notice of a Public Scoping Meeting was included as part of the NOP. This scoping meeting, which was held by Metro to obtain additional input as to the scope and content of the EIR, was held on December 16, 2003. With public and agency input received in response to the NOP and during the scoping meeting, an Initial Study was prepared for the

West Los Angeles Transportation Facility which identifies the scope of the issues to be addressed in the EIR and provides a demonstration as to why other issues not addressed in the EIR will not result in a significant impact to the environment. Both the NOP and Initial Study for the West Los Angeles Transportation Facility, as well as written comments received in response thereto, are provided in Appendix A (A1) to this EIR.

The City of Los Angeles, as Co-Lead Agency for the Sunset Avenue Project with Metro, also determined that an EIR should be prepared for the Sunset Avenue Project, and thus, distributed an NOP and Notice of Public Scoping Meeting in March 2004 relative to this project. The scoping meeting for the Sunset Avenue Project was held by the City of Los Angeles on April 7, 2004. As with the Transportation Facility, with public and agency input received in response to the NOP and during the scoping meeting, an Initial Study was completed for the Sunset Avenue Project. This document identifies the scope of the issues to be addressed in the EIR regarding this project and provides a demonstration as to why other issues not addressed in the EIR will not result in a significant impact to the environment. The NOP and Initial Study for the Sunset Avenue project are also provided in Appendix A (A2) to this EIR.

While the various steps within the CEQA process leading to preparation of this Draft EIR were completed separately for the West Los Angeles Transportation Facility and Sunset Avenue projects, this Draft EIR has been prepared to address the environmental impacts of both projects. This decision between Metro and the City of Los Angeles was made based on Metro's ownership of the Sunset Avenue property, Metro's commitments to close down the Division 6 Bus Depot when and if the West Los Angeles Transportation Facility opens and to operate the new Transportation Facility thereafter, and, finally, the awareness that redevelopment of the Sunset property is reasonably foreseeable.

For both the Transportation Facility and Sunset Avenue sites, this EIR includes an analysis of the following environmental issue areas: Aesthetics; Air Quality; Geology/Seismic Hazards; Hazardous Materials; Water Quality; Land Use; Noise; Transportation and Circulation; Parking; and Utilities, including Water and Wastewater. In addition, the Draft EIR includes an analysis of Historic Resources with regard to the Sunset Avenue Project and Water Quality with regard to the West Los Angeles Transportation Facility. Please refer to the Table of Contents.

C. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

West Los Angeles Transportation Facility. Concern was expressed at the public meeting that this transportation facility may be inappropriate in the project locale and may adversely effect residential uses in the surrounding area as a result of bus traffic and associated air pollution emissions and noise. These issues are thoroughly investigated in this Draft EIR.

Sunset Avenue Project. The existing Division 6 bus operations and maintenance facility on the project site has long been recognized as a land use that is increasingly incompatible with the historic as well as the emerging land use fabric of the surrounding Venice Community. Its departure is made possible by this project in conjunction with the West Los Angeles Transportation Facility. With the opportunity to imagine its absence, the public scoping meeting gave forum to the expression of other ongoing local planning issues such as traffic congestion, particularly during the summer beach season, density and a pervasive community-wide parking deficiency. Each of these issues is also thoroughly investigated in this Draft EIR.

D. ALTERNATIVES TO REDUCE OR AVOID SIGNIFICANT EFFECTS

Consistent with CEQA requirements, the Draft EIR evaluates a range of alternatives to determine their comparative merits, relative to project objectives and the avoidance of potentially significant impacts. The selection of the alternatives chosen for analysis responds to the unique situation of the two projects and the two development sites. Four alternatives were selected for each site, each of which includes a No Project/No Build alternative. These alternatives assume that the two sites would continue their current uses and conditions. One alternative for each site is based on land uses reasonably expected to occur in the foreseeable future. Reduced project alternatives for both development sites were selected on the basis of their representing the same land use as the project, but at reduced density or intensity. In addition, an alternative location was considered for the West Los Angeles Transportation, and a reduced height alternative was considered for the Sunset Avenue site.

1. West Los Angeles Transportation Facility

Alternative A: No Project/No Build

Under the No Project/No Build alternative, the West Los Angeles Transportation facility site would remain in its current state without any modifications. The project site would remain vacant, and existing site buildings would be unused.

Accordingly, there would be no project impacts and, thus, fewer impacts than the proposed project, with regard to aesthetics, air quality, historic resources, geology/seismic hazards, land use/relationship to surrounding uses, noise, transportation, parking, and utilities. However, as the proposed project has no residual significant impacts, that alternative would not cause the avoidance of any such impacts. This alternative would be considered to have greater impacts regarding hazardous materials, water quality, and land use/regulatory framework. Some contaminated soils on the project site would not be treated, and development to accommodate growth per applicable plans and policies would not occur. Further, without the implementation

of this project component, it would be necessary for operations to increase in the current facility at the Sunset Project site. This would cause an increase in impacts at that site.

This alternative would not meet the project's basic objectives. It would not provide a modern facility that meets bus maintenance and servicing needs, supports the conversion to a 100 percent CNG fleet, enhances hours of service, relieves overcrowding at other facilities, and enhances bus operations. This alternative would not reduce costs that would result from enhanced facilities and efficiencies associated with a more centralized location. Operating costs would increase due to buses needing to travel from further, distant locations.

Alternative B: No Project/Community Plan

Under this alternative, the Transportation Facility site would be developed with uses that would be likely to occur if the proposed project were not to proceed. The uses are based on existing plan and zoning designations, as well as surrounding uses. The alternative would include light industrial uses in an industrial park development with approximately 121,800 sq.ft. of floor area, or a 0.6:1 FAR.

The impacts of the alternative would be substantially similar to the proposed project. The only variation would occur in regard to water consumption and wastewater, where anticipated uses could have greater impacts than the proposed uses.

This alternative would not meet the project's basic objectives. It would not provide a modern facility that meets bus maintenance and servicing needs, supports the conversion to a 100 percent CNG fleet, enhances hours of service, relieves overcrowding at other facilities, and enhances bus operations. This alternative would not reduce costs that would result from enhanced facilities and efficiencies associated with a more centralized location. Operating costs would increase due to buses needing to travel from further, distant locations.

Alternative C: Reduced Project

Under this alternative, the project site would be developed with a reduced version of the proposed West Los Angeles Transportation Facility. There would be 150 buses housed on-site, a reduction of approximately 14 percent, or 25 buses from the 175 buses proposed under the project. The Reduced Project alternative would continue to include 14 maintenance bays and a total of approximately 72,000 square feet of area, including auxiliary facilities, similar to the project. If this alternative were selected for development, alternative sites, including other district transit facilities, would be needed to house and service the additional 25 buses needed for Metro's operation in West Los Angeles.

Environmental impacts would be somewhat similar to those of the proposed project. The variations in site impacts would be associated with a reduction in project trip generation for project buses, including reductions in traffic-related air quality and noise impacts. As the proposed project impacts for these topics are less than significant, the reductions would not be needed to avoid significant impacts. Further, while these impacts would be reduced, some additional traffic, with related air quality and noise impacts, could occur due to shuttling of excess buses between transportation facilities.

This alternative would not meet the project's basic objectives to the same extent as the proposed project. Nonetheless it would contribute to a degree by providing a modern facility that helps meet bus maintenance and servicing needs, supports the conversion to a 100 percent CNG fleet, enhances hours of service, relieves overcrowding at other facilities, and enhances bus operations. This alternative would contribute to a reduction in costs that would result from enhanced, modern facilities and efficiencies associated with a more centralized location, but to a lesser extent than the proposed project.

Alternative D: Alternative Location

Under this alternative, the Transportation Facility would be provided at an alternative location. The Metropolitan Transportation Authority does not currently own property that could serve as an alternative site for the West Los Angeles Transportation Facility. As a public service, Metro is entitled to practice eminent domain; however, it chooses to avoid this avenue of acquisition, unless specific situations warrant it, due to community relations and Metro's standard practices. Finding and acquiring development sites has been a difficult challenge for Metro since potential sites which would meet the needs of a transportation facility are limited. Metro has been attempting to find a new site for the relocation of Division 6 since 1976. The acquisition of the Jefferson Boulevard site represents the culmination of several years of searching for an alternative to the Sunset Avenue location and the merits of the selected site. In lieu of a specific alternative site, the alternative sites analysis addresses general areas that were deemed to be viable for the development of the proposed project.

Impacts with location of the project at an alternative site would be dependent on the specific site selected, but would likely offer similar impacts to those of the proposed project. The service area served by the Transportation Facility comprises a built urban environment with a roadway grid of urbanized traffic. Therefore, traffic impacts and associated air quality and noise impacts would not necessarily be reduced. As the project site is located within a light-industrial area, its separation from residential areas and lack of unique visual qualities (such as a scenic corridor or crest of a hill) would be difficult to improve upon. As noted elsewhere, the proposed project would not generate significant impacts that could be lessened by location of the project at an alternative site. Further, impacts from increased operations at the Sunset Avenue

site would increase during the delayed time until an alternative site could be acquired and developed.

This alternative could ultimately, partially meet some of the project's basic objectives, if a suitable site could be found and developed. It would ultimately provide a modern facility that would meet bus maintenance and servicing needs, support the conversion to a 100 percent CNG fleet, enhance hours of service, relieve overcrowding at other facilities, and enhance bus operations, albeit with a delay of a considerable number of years. This alternative would contribute substantially less than the proposed project to cost reductions that would result from enhanced facilities and efficiencies associated with a more centralized location. Operating costs would increase due to buses needing to travel from further, distant locations.

Environmentally Superior Alternative

The State CEQA Guidelines require that Environmental Impact Reports select one of the alternatives analyzed as the environmentally superior alternative. In cases where the No Project Alternative is so identified, an environmentally superior alternative must be identified among the remaining alternatives. Accordingly, the Reduced Project alternative has been identified as the environmentally superior alternative for the Transportation Facility site, since it would directly reduce some project impacts, would generate impacts similar to or less than the other built alternatives, and would partially meet the project objectives. However, the proposed project would be environmentally preferable to the "environmentally superior" Reduced Project alternative. The Reduced Project alternative would offer a lesser capacity for bus maintenance and servicing, thus causing greater shuttling of buses, with increased traffic, air quality and noise impacts. Further, it may be noted that the Reduced Project alternative would not cause any significant project impact to be avoided.

2. Sunset Avenue Project

Alternative E: No Project/No Build

Under this alternative, the proposed residential/commercial project would not be developed, and the Sunset Avenue site would continue its current site activities and conditions; i.e., housing the Transportation Facility activities. Metro would be expected to continue searching for an alternative site, but would likely increase operation at the site, with longer operating hours and greater site activity. At some point in the future, Metro would be in the position of housing buses at the Sunset Avenue site but fueling them at an alternate location. Due to the need for off-site CNG fueling during non-operating hours, buses would be shuttled to fueling locations during the night, resulting in increased nighttime traffic noise in the

surrounding residential neighborhood. The shuttling of buses would also be inefficient, costing a considerable number of additional travel miles.

This alternative would avoid the direct environmental impacts of implementing the proposed project, but would allow some adverse impacts to occur that would be addressed under the proposed project. This alternative would reduce impacts regarding aesthetic character, shading, air quality, historic resources, geology/seismic hazard, water quality, noise, transportation, and utilities. The alternative would not allow the improvements associated with removal of hazardous materials, nor certain land use benefits: the removal of the historically dated, light-industrial use from amidst residential uses; the provision of additional visitor/beach parking; the provision of affordable housing in the area; or support for plans and regulations calling for a mixed-use residential/commercial development at the project site. The alternative would also result in increased night-time traffic and noise due to increased bus operations at the project site.

This alternative would not meet the project's basic objectives. It would not allow the relocation of the Transportation Facility, nor would it provide the proposed market rate and affordable housing units in response to projected population growth, commercial uses, or public parking uses. Further, this alternative would not convert the historically outdated use of the property to uses that would revitalize the project area, as specified in City plans and policies. It would not maximize the value of the property, or support investment in the community.

Alternative F: Alternative Land Use – Commercial Uses

This alternative explores a site development that might occur if Metro vacated the Sunset Avenue site and the proposed residential/commercial project was not approved. The alternative uses are based on existing land uses in the general project vicinity, development trends, and plan and zoning designations for the project site. Under the alternative, the site would be developed with a commercial project, with approximately 102,250 sq.ft. of floor area, reflecting a floor area ratio (FAR) of 0.75:1.

This alternative would reduce utility impacts and shading impacts. The alternative would have lower heights than the proposed project, thus reducing the cause of its significant impact on aesthetic character. At the same time the commercial uses could cause an inharmonious transition in character with the properties across Sunset Avenue and Thornton Place, thus resulting in significant impact from the differing uses. Further, this alternative would generate more traffic than the proposed project. Traffic impacts would require mitigation, although a residual significant impact on traffic may occur, where no such significant impact occurs with proposed project. Impacts on land use and illumination would be greater than those of the

proposed project. Impacts would be similar with regard to views, air quality, historic resources, geology/seismic hazard, hazardous materials, water quality, noise, and parking.

This alternative would not meet most of the project's basic objectives. It might potentially support the relocation of the Transportation Facility, although it has not been determined that the alternative could provide the economic justification for doing so. This alternative could convert the historically outdated site use in a manner that would support revitalization of the neighborhood and a commercial presence on Main Street. Otherwise, it would not provide the proposed mixed-use project with market rate and affordable housing units in response to projected population growth rates and demand for such housing, as identified in applicable City plans and policies. Further, this alternative would not implement design objectives intended to create an aesthetic, comfortable living project that would complement surrounding uses and add to the overall character of the area.

Alternative G: Reduced Density

Under this alternative, the number of residential units would be reduced to 171 residential units. This is the number of units allowed under the designated CM zoning, exclusive of the affordable housing density bonus that is provided under City policies, and local plans. Notwithstanding, this project would include an affordable housing component. The residential floor area would be reduced from approximately 270,000 sq.ft. to approximately 204,500 sq.ft., a reduction of approximately 24 percent in residential floor area. The commercial component of the project would remain at 10,000 sq.ft.

This alternative would likely reduce the amount of building massing on the project site, however such reductions would not necessarily result in lower heights along Thornton Place and Sunset Avenue. Therefore, the project's significant impact on aesthetic character would not necessarily be reduced. The project's significant construction impact on air quality would be reduced, although not to a level of insignificance. The project's non-significant utility impacts would also be reduced. Shading impacts would not necessarily be reduced. Traffic generation would be reduced, although such reduction would not eliminate significant pre-mitigation impacts of the proposed project. (With mitigation, traffic impacts of the proposed project are less than significant.) Land use impacts would be somewhat similar to those of the proposed project, although this alternative would not implement density bonuses that have been included in plans to help support the provision of affordable housing and meet anticipated population needs, and identified in the applicable plans. Impacts would be similar with regard to views, illumination, historic resources, hazardous materials, water quality, and noise.

This alternative would not meet the primary objective to generate the land use and economic justification to relocate the Transportation Facility, nor would it meet the objective of

providing a mix of affordable and market-rate housing in response to projected population growth and demands for such housing. This alternative would not maximize the value of the property. The alternative would convert the historically outdated site use in a manner that would support revitalization of the neighborhood and a commercial presence on Main Street. Further, this alternative would implement design objectives intended to create an aesthetic, comfortable living project that would add to the overall character of the area.

Alternative H: Reduced Height – Sunset Avenue Site

Under this alternative, project's four-story buildings along the frontages of Thornton Place and Sunset Avenue would be reduced to three floors. Thus, maximum building heights along those roadways would be similar to the project's building heights along Pacific Avenue and Main Street and would not exceed 35 feet. This height reduction would require the removal of the 15 units or their relocation to the central portion of the site. While some or all of these units could be relocated in the site's interior, this analysis assumes that the alternative would include 210 units and 10,000 sq.ft. of commercial uses.

This alternative would reduce the proposed project's significant impact regarding aesthetic character (associated with contrasting building heights along Thornton Place and Sunset Avenue) to a less-than-significant impact. It would also negligibly reduce the project's significant construction impact on air quality and noise, although not to a level of insignificance. The project's non-significant shading and utility impacts would also be reduced. Traffic generation would be slightly reduced, although such reduction would not eliminate significant pre-mitigation impacts of the project. (With mitigation, traffic impacts of the proposed project are less than significant.) Land use impacts would be somewhat similar to those of the proposed project, although this alternative would not provide the same level of visitor/beach parking as the proposed project. Impacts would be similar with regard to views, illumination, historic resources, hazardous materials, water quality, and noise.

This alternative would meet most of the primary objectives of the project, but to a lesser degree. It is not known whether reducing the relative satisfaction of the objectives would provide sufficient land use and economic justification to relocate the Transportation Facility. This alternative would not maximize the value of the property. The mix of market-rate and affordable housing provided would contribute to the objectives of providing such housing to meet projected growth and demand for such housing, but not to the same extent as the project.

Environmentally Superior Alternative

As noted above, the State CEQA Guidelines require that Environmental Impact Reports select one of the alternatives analyzed as the environmentally superior alternative. In cases

where the No Project Alternative is so identified, an environmentally superior alternative must be identified among the remaining alternatives. Accordingly, the Reduced Height alterative has been identified as the environmentally superior alternative for the Sunset Avenue site. Of the alternatives analyzed, only this alternative would reduce the project's significant aesthetic impact. Further, it would also reduce other non-significant impacts associated with the number of units on site; e.g. there would be slightly less traffic generation. The Alternative Use/Commercial alternative would also have lower project heights, but would have less compatibility with aesthetic character of adjacent residential units; and would generate some impacts that would be greater than the proposed project, e.g. traffic impacts. The Reduced Density alternative would reduce the project's non-significant impacts overall to a slightly greater extent than would the Reduced Height alternative, but would not necessarily avoid the significant aesthetics impact. The Reduced Density alternative would not meet the project's basic objectives, whereas the Reduced Height alternative could partially meet them.

E. PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

1. Aesthetics

a. Project Impacts

(1) West Los Angeles Transportation Facility

Aesthetic Character. The proposed West Los Angeles Transportation Facility would convert the degraded, neglected character of the project site to the orderly, designed appearance of new improvements. The functional and efficient structures and related facilities will be consistent with, though more contemporary than, surrounding industrial and commercial improvements. The facility will be well screened by a perimeter wall with a minimum height of eight feet. The frontage along Jefferson Boulevard would include a decorative wall and landscaping that would soften the project appearance, and minimize street views of the on-site buses, and activities.

Therefore, the project would not detract from the valued visual character of the community, neighborhood or localized area by conversion of large areas of visible natural open space, or valued visual resources. Further, the project would not introduce inappropriate contrast between project elements and existing features that embody the area's valued aesthetic image. Finally, the project would be consistent with those aesthetic goals and policies of plans and regulations that are applicable to the project. The West Los Angeles Transportation Facility would not have a significant impact on the aesthetic character of the area.

Views. Views of the project site are limited and occur mainly from the adjoining segment of Jefferson Boulevard, from across the Ballona Channel in Culver City, and from some locations in the Baldwin Hills and Blair Hills areas. No existing views along Jefferson Boulevard would be obstructed by the project development. Views of the improved project site from the Baldwin Hills would be at distant, low viewing angles such that the Transportation Facility would blend into the surrounding urban plain. Therefore, the project would not substantially alter views of valued viewsheds and would not obstruct any part of valued views available from a designated scenic highway, corridor, or parkway. Transportation Facility impacts on views would not be adverse.

Illumination. The proposed project is surrounded by compatible light-industrial and commercial land uses that are not sensitive to nighttime illumination. Nighttime illumination will comply with applicable City regulatory provisions to ensure that adjoining properties are not adversely affected. The illumination will not be expected to stand out against the greater city lights backdrop due to scale or illumination intensity. Further, the project would not include highly reflective building materials that would cause glare at sensitive off-site locations. Therefore, the Transportation Facility would not substantially affect nighttime views or substantially illuminate adjacent, off-site, light-sensitive uses.

Shading. The proposed structures are generally one level in height, less than 20 feet, and would not cast significant shadows at any time. The tallest structure, a three-level administration building, would be located on the eastern, back side of the property. As no shadow-sensitive uses are located nearby and since project-related shadows would be minimal, no adverse shading impacts attributable to this project are identified.

(2) Sunset Avenue Project

Aesthetic Character. The proposed Sunset Avenue Project would replace the vacated Division 6 operation with a mix of residential and commercial uses supported by two levels of subterranean parking. Residential uses would occupy several individual structures that would each contain a varying number of dwelling units, with varied heights and shapes. Commercial uses would be located on the ground floor of a structure that would be sited along Main Street on the Thornton Place side of the property, while residential uses would occupy the balance of the ground floor and all of the upper floors of that structure.

The Main Street portion of this structure would include three residential levels and would not exceed 35 feet above the site's determined datum level. To the rear, the interior portion of the structure will contain variously three, four, and five residential levels with maximum height along its Thornton Place and Sunset Avenue frontages not exceeding 45 feet, and with maximum height in the highest center of the structure not exceeding 56 feet. The remaining residential

structures will mostly have four levels, though they step down to two and three levels at the Pacific Avenue frontage, where maximum height will not exceed 35 feet.

This project would rather dramatically convert the site's current appearance from that of a somewhat isolated and degraded automotive maintenance facility to a new mixed-use development with interplay between building volumes and open spaces for indoor and outdoor use and with a modern palette of building materials, finishes, and landscape. Subject to personal preferences, such a change could be perceived as a major enhancement or as a loss of underdeveloped, albeit industrial, space amidst the urban setting.

Main Street is wide and offers easy, open views of the site to passing motorists and pedestrians. The buildings along Main Street will provide a limited, urban setback of five feet, and building height will not exceed 35 feet, as established by the Specific Plan. Higher building heights deeper into the site are proposed and may be visible from Main Street. This is typical along mixed commercial streets and is not without precedent on Main Street. The current character of Main Street as it extends from north of Rose Avenue to locations south of the project site and Abbot Kinney Boulevard is highly eclectic with a wide mix of building uses, sizes, and styles, and in which newer and older structures are well represented. The project would effectively contribute to this mix and would not be out of place by use or general appearance. The commercial uses would be pedestrian-friendly and would contribute to a continuity of uses along Main Street. The project would also cause the beneficial conversion of isolated and no longer appropriately located transportation infrastructure facilities to appropriate urban improvements and form.

Pacific Avenue, in contrast to Main Street, is both a narrower and faster street, serving primarily as a transportation corridor. Adjoining structures with frontage on and near Pacific Avenue house single-family and multi-family residential uses and vary widely in height from 15 to 30 feet. A few taller, older buildings exist along the beach further west. After dedication of right-of way with which to widen Pacific Avenue, each of five proposed residential structures with frontage on this street will be set back approximately seven feet. Building heights would terrace down to two and three stories, respecting the 35-foot building height limitation and heights of nearby residential units. With the proposed landscape, this edge of the proposed project should offer some welcome visual relief from the narrow, confused, and hard-edged visual character currently presented by the existing facilities on the project site and which typifies this busy street.

Sunset Avenue and Thornton Place are narrow passage ways. All uses and improvements along both streets are residential, and many of these improvements approach the respective property lines quite closely. These buildings are variously 15 to 30 feet in height on very narrow lots, some not wider than 25 feet. The project proposes a dedication of approximately 16 feet to

widen Sunset Avenue and landscaped setbacks of 5 to 15 feet along both streets to open the appearance of these narrow streets and create separation from the respective structures across them. Upon completion, project buildings will be 50 to 60 feet away from existing structures opposite Sunset Avenue and 25 to 50 feet from existing residences along Thornton Place. The proposed structures will be architecturally articulated, employ attractive materials and finishes, and effectively landscaped. However, with four residential levels, they are proposed at heights ranging from 40 to 50 feet, significantly higher than existing structures across Sunset Avenue or Thornton Place and appreciatively higher than the 35-foot height limitation recommended by the Specific Plan.

Implementation of the project would require Specific Plan Exceptions to regulations regarding building height and floor area ratio (FAR). Approvals of such exceptions are being sought as project actions. Such exceptions are consistent with the overall intent of the plan to encourage affordable housing, and would exercise a trade-off that is anticipated in the Plan, but would none-the-less facilitate massing impacts greater than surrounding areas, and greater than anticipated in the Specific Plan requirements. The project's new development would introduce substantial contrast between proposed project elements and existing features that embody the area's valued aesthetic image. Therefore, it is concluded that the project's impact on aesthetic character would be significant.

Views. Views of the project site from public vantages occur mainly from the public thoroughfares adjacent to the project site: Main Street and Pacific Avenue. Neither of these roadways is designated as a scenic highway, corridor or parkway. Existing views along both of these roadways is of the built, urban environment. The project site is neither a large natural area nor a valued view resource in its own right. In fact, as an aging transportation infrastructure facility, it may be characterized as quite the opposite. Further, as infill development, the project would continue the built development pattern between these roadways and would not affect views of viewsheds for travelers.

Other views over the project site from private vantages are limited due to level terrain, intervening development, and low elevations of surrounding buildings from which views may be accessible. Project impacts on views from private locations may occur from a few distant locations and would be of a type that regularly occurs with infill development in an urban setting where one private party's "view" is through the buildable space of another private party's property.

The project would not obstruct views of the Pacific Ocean, a coastal, visual resource. The project would be consistent with Coastal Zone policies regarding visual access to coastal resources.

Illumination. The project site is currently illuminated during evening hours by relatively bright pole-mounted fixtures arrayed in toward the site's interior from locations near the periphery to support the existing bus parking and maintenance activities. The proposed project would have lighting that is similar to other residential and commercial uses in the vicinity. Project lighting would be directed on-site, broken up by multiple building masses, and illumination levels would be less than what currently exists on the project site. Lighting would conform to Municipal Code requirements regarding illumination impacts. The project would not include highly reflective building materials. The project's lighting would not affect nighttime views, nor illuminate adjacent, off-site, light-sensitive uses.

Shading. The project's shading impacts would be limited. Potentially sun-sensitive uses are limited to residential units in the area that might be designed for sun utilization. The proposed project would not cause any shading on residential uses along Pacific Avenue or Thornton Place during the main day-time hours. Potential shading on the artist's lofts units on Main Street would be extremely limited. The greatest shading during the hours analyzed would occur on the winter solstice when shading would fall along the foot of the buildings for less than an hour. The greatest potential for shading would occur on the residential units along Sunset Avenue. Shading at the summer solstice and equinoxes would be non-existent and/or negligible. The greatest shading would occur on the winter solstice. Such shading would not occur for more than three hours, which is the significance threshold for the period falling between late October and early April. Project impact from shading would be less than significant.

(3) Combined Projects

Each of the proposed projects is located in a different community within different viewsheds. Therefore, the two projects would have the effects reported for each individually, and would not contribute to a combined impact.

b. Cumulative Impacts

The proximity of related projects to the two project sites is limited. Related projects would typically be in-fill projects at more distant locations than would be required to comply with local regulations. None of the related projects is located in the immediate vicinity of the Transportation Facility site so as to cause a notable, combined aesthetic impact. Only two of the related projects are located within the same viewshed as the Sunset Avenue Project. These related projects are in keeping with the uses and eclectic character of the area along and east of Main Street. They contribute to the continuation of that character. The analysis of project impacts determined that a significant aesthetic impact, due to a substantial change in local visual character associated with proposed building heights, would occur. The conclusion was based on the proposed massing of project buildings and their relationship to the surrounding community.

The addition of the related projects does not contribute to the conclusion regarding project impacts alone, nor would they exacerbate those impacts. Nonetheless, since the project's impact is significant and the project is a component of the cumulative condition, the cumulative impact of the project, in conjunction with related projects, must be considered significant.

None of the related projects to either the West Los Angeles Transportation Facility or the Sunset Avenue Project would contribute to cumulative impacts on aesthetic resources, views, illumination, or shading.

c. Mitigation Measures

West Los Angeles Transportation Facility.

This project has no significant adverse aesthetic impacts; therefore, no mitigation is required.

Sunset Avenue Project.

Mitigation Measure Sunset-A.1. This project's significant adverse aesthetic impact due to substantially abrupt transition in building heights across Sunset Avenue and Thornton Place may be mitigated by reducing on-site building heights along these streets to conform to the 35-foot height limit prescribed by the Specific Plan. In considering the feasibility of this measure, the benefits of such mitigation should be weighed against this project's potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. This project would not cause adverse aesthetic impacts upon aesthetic character, views, illumination, or shading.

Sunset Avenue Project. This project would not cause significant view, illumination, or shading impacts upon surrounding properties. In addition, the identified significant impact upon aesthetic resources associated with a portion of the project's building heights relative to adjoining properties can only be mitigated by reducing the height of the particular structures that cause this impact.

Combined Projects. Each of the proposed projects is located in a different community within different viewsheds. Therefore, the two projects would have the effects reported for each individually, and would not contribute to a combined impact.

2. Air Quality

a. Project Impacts

West Los Angeles Transportation Facility. Construction of the Transportation Facility would generate fugitive dust and combustion emissions. Regional construction emissions would exceed the South Coast Air Quality Management District (SCAQMD) daily significance threshold for NO_X but would fall below the SCAQMD daily significance thresholds for CO, PM_{10}, ROC and SO_X. Thus, construction emissions would result in a significant short-term regional air quality impact for NO_X without incorporation of mitigation. Construction activity would also result in the emissions of PM_{10}, NO_2, and CO that are of concern on a local level. A localized analysis completed using SCAQMD recommended guidance indicated that the project's worst-case maximum on-site construction emissions would remain below their respective SCAQMD localized significance thresholds. As such, localized construction impacts would be less than significant.

Operation of the project would result in a redistribution of the physical location where buses from existing routes are currently parked and maintained, as well as a redistribution of physical location where existing employees work to accommodate such changes. Mobile emissions related to the change in non-revenue miles[1] as a result of the physical location where buses from existing routes are currently parked and maintained would decrease and mobile emissions related to changes in existing worker commute trip lengths due to changes in workplace facility locations would increase for some employees and decrease for others resulting in a negligible change in overall commute trip VMT and related air pollutant emissions. Therefore, the project would result in a beneficial net decrease in long-term regional mass daily emissions. During the operational phase of the project, project traffic would have the potential to generate local area CO impacts. An analysis was performed to determine the potential for creation of CO hotspots attributable to the project. This analysis indicated that project-related traffic would not result in any exceedances of the State 1-hour or 8-hour CO standards.

The air quality analysis examined the consistency of the project with the SCAQMD's Air Quality Management Plan (AQMP). No significant impacts would occur as a result of the project with respect to consistency with applicable air quality management policies.

With regard to air toxics, diesel buses are being phased out of the MTA bus fleet in favor of CNG or other alternative fuels. The only diesel buses using the facility would be for

[1] *Also known as "deadhead" miles, non-revenue miles are the travel miles that are incidental the transit route (revenue) miles (e.g., the "out of service" travel between a service route and maintenance facility).*

occasional maintenance purposes. However, the project would comply with all SCAQMD rules governing the use of CNG fuel (i.e., vapor control technology and nuisance avoidance) which would limit the potential of emissions that could impact sensitive receptors in the project area. Therefore, project-related air toxic impacts would be less than significant.

Sunset Avenue Project. Construction of the Sunset Avenue site would generate fugitive dust and combustion emissions. Regional construction emissions would exceed the SCAQMD daily significance threshold for NO_X but would fall below the SCAQMD daily significance thresholds for CO, PM_{10}, ROC, and SO_X. Thus, construction emissions would result in a significant short-term regional air quality impact for NO_X without incorporation of mitigation. Construction activity would also result in the emissions of PM_{10}, NO_2, and CO that are of concern on a local level. A localized analysis completed using SCAQMD recommended guidance indicated that the project's worst-case maximum on-site construction emissions would remain below their respective SCAQMD localized significance thresholds. Thus, localized construction impacts would be less than significant.

Air pollutant emissions associated with project occupancy and operation would be generated by both the consumption of energy (electricity and natural gas) and by the operation of on-road vehicles. Regional emissions resulting from project operation would remain below the SCAQMD thresholds for all criteria pollutants. Therefore, operation of the project would not result in a significant impact to regional air quality. During the operational phase of the project, project traffic would have the potential to generate local area CO impacts. An analysis was performed to determine the potential for creation of CO hotspots attributable to the project. This analysis indicated that project-related traffic would not result in any exceedances of the State 1-hour or 8-hour CO standards.

The air quality analysis examined the consistency of the project with the SCAQMD's Air Quality Management Plan (AQMP). No significant impacts would occur as a result of the project with respect to consistency with applicable air quality management policies.

Potential sources of air toxic emissions (e.g., detergents, cleaning compounds, glues, polishes, floor finishes, cosmetics, antiperspirants, rubbing alcohol, room fresheners, and paint and lawn products) from the project are typical within the urban environment and would contribute small amounts of toxic air pollutants to the project vicinity, and would be well below any levels that would result in a significant impact on human health. Also, the project would result in removal of the existing bus depot, and thus, result in a reduction of diesel particulate emissions in the project area. Thus, the project would not result in a significant air toxic impact.

Combined Projects. The Transportation Facility site location would be fully completed and operational prior to the demolition and redevelopment of the Sunset Avenue site location.

Therefore, there would be no construction activity overlap between the two project site locations. However, there would be a period of overlap with the Transportation Facility site operations-period emissions and the Sunset Avenue site construction-period emissions. Composite daily emissions would remain below SCAQMD significance thresholds for CO, PM_{10}, ROC, and SO_X but emissions of NO_X would exceed the established SCAQMD daily regional construction significance threshold without incorporation of mitigation.

Following the completion and occupancy of the Sunset Avenue site location, there would be overlap with respect to the Transportation Facility and Sunset Avenue site operations-period emissions. Composite mass emissions would remain below SCAQMD daily significance thresholds. As such, combined operations impacts would be less than significant on regional and local levels.

b. Cumulative Impacts

The two project sites would not result in concurrent construction and since the applicant has no control over the timing or sequencing of the related projects in the study area, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be entirely speculative. A portion of the Mid-City/Exposition Light Rail Transit (LRT) alignment is located within the Transportation Facility project study area. However, construction of the LRT alignment is not anticipated to start until year 2007, which is well after the scheduled development of the Transportation Facility project site. Given that the project has short-term regional construction impact for the ozone precursor NO_x at both site locations, combined with the fact that the Basin is non-attainment for ozone, the project would contribute to a significant cumulative construction air quality impact.

With respect to long-term project operations, the Transportation Facility project would be consistent with the underlying growth assumptions on which the AQMP is based and the marginal increase in ROC and CO emissions that would occur as a result of development of the Sunset Avenue site would not be cumulatively considerable.

With regard to cumulative localized effects, the localized CO impact analysis evaluated the mobile CO emissions related to project, related project, and ambient growth traffic volumes. Increases in localized CO concentrations would not exceed SCAQMD significance thresholds. As such, localized air quality impacts would be less than significant on a cumulative level.

c. Mitigation Measures

West Los Angeles Transportation Facility. Mitigation Measures B-1 through B-4 implement recommended mitigation measures provided in SCAQMD's *CEQA Air Quality*

Handbook, Chapter 11 and/or URBEMIS 2002 for reduction of short-term significant construction regional NO_X impacts

Mitigation Measure WLA-B-1: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure WLA-B-2: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure WLA-B-3: Use electricity from power poles, rather than temporary diesel or gasoline powered generators if or where feasible.

Mitigation Measure WLA-B-4: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

Sunset Avenue Project. Mitigation Measures B-1 through B-4 implement recommended mitigation measures provided in SCAQMD's *CEQA Air Quality Handbook*, Chapter 11, and/or URBEMIS 2002 for reduction of short-term significant construction regional NO_X impacts.

Mitigation Measure Sunset B-1: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure Sunset B-2: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure Sunset B-3: Use electricity from power poles, rather than temporary diesel or gasoline powered generators if or where feasible.

Mitigation Measure Sunset B-4: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. The implementation of mitigation measures described in Section IV.B., Air Quality, of this EIR would reduce NO_X emissions during construction to a level that is less than significant. As such, construction activities at the West Los Angeles Transportation Facility site location would not have a significant impact on air quality. In addition, as indicated in Section VI.E., Potential Secondary Effects, no significant secondary impacts associated with air quality would occur from implementation of the proposed mitigation measures included throughout Chapter IV.

Sunset Avenue Project. Although implementation of the project features and mitigation measures described in Section IV.B., Air Quality, of this EIR would reduce construction air quality impacts, activities related to construction of the project would continue to exceed the SCAQMD daily emission thresholds for regional NO_X. As such, construction of the project would have a significant and unavoidable impact on air quality. In addition, as indicated in Section VI.E., Potential Secondary Effects, no significant secondary impacts associated with air quality would occur from implementation of the proposed mitigation measures included throughout Chapter IV.

3. Historic Resources

a. Project Impacts

West Los Angeles Transportation Facility. It was determined in the Initial Study that the West Los Angeles Transportation Facility would not have adverse impacts upon historic resources. However, precautionary mitigation is proposed regarding accidental discovery of human remains from recent, historic or pre-historic periods, or of vertebrate fossil resources, during construction.

Sunset Avenue Project. Under the proposed project, all of the buildings associated with the project site are scheduled for demolition and the site cleared for new construction. The existing Metro Division 6 – Venice bus maintenance site and associated buildings appear ineligible for listing in the National Register, California Register, and for local designation. In addition, the property is not considered a historic resource for the purposes of CEQA compliance. Therefore, no adverse impacts regarding historic resources for this property are expected. However, under this project, direct impacts would occur to the Vietnam POW/MIA Memorial Mural located on the western portion of the site and as such would pose a potential adverse impact on what may be considered a historic or cultural resource. The mural located on the concrete block wall of the bus washing structure is to be removed. Its retention in place is infeasible since its size, location and content would not be compatible with residential

development of the Sunset Avenue Project. Although the mural appears ineligible for the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument, it is eligible for special consideration in the local planning process. Further, in light of relevant federal, state and local laws and regulations related to murals, the Vietnam POW/MIA Memorial Mural can be looked upon as a historic resource for the purposes of CEQA. Therefore, a potential adverse impact may occur due to the demolition of the mural and mitigation measures are recommended to implement this project. Further mitigation is recommended as a precautionary measure regarding accidental discovery of human remains from recent, historic or pre-historic periods, or of vertebrate fossil resources, during construction.

Combined Projects. The West Los Angeles Transportation Facility and the Sunset Avenue Project would not have a combined impact on paleontological resources due to their geographic separation. The proposed projects would not contribute to a combined impact for historical resources.

b. Cumulative Impacts

None of the related projects identified in Section III.B, Related Projects, of this Draft EIR is known to adversely effect cultural resources of any sort. Although murals are a well-represented form of public art in the Venice and Santa Monica area surrounding the Sunset Avenue Project, none are known to be threatened with removal. Therefore, cumulative impacts considered in conjunction with the Sunset Avenue Project's proposed removal of the on-site MIA/POW Mural would not expand the assessment of this project impact to a significant adverse level.

c. Mitigation Measures

(1) Historical Resources – Sunset Avenue Project

Mitigation Measure Sunset-C.1: Photography and Recordation. As the initial step in any mitigation program, and prior to alteration, relocation, or demolition of the mural, a photographic documentation report shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. This report shall document the significance of the mural and its physical conditions, both historic and current through photographs and text. Photographic documentation should be taken utilizing 35-mm black and white film. The photographer should be familiar with the recordation of historic resources. Photographs should be prepared in a format consistent with the Historic American Buildings Survey (HABS) standards for field photography. Copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los

Angeles Planning Department,[2] the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

Mitigation Measure Sunset-C.2: Relocation. The feasibility of relocating the mural to an off-site location should be explored to mitigate project impacts on this historic resource. A determination of a reasonable and acceptable cost for the mural's relocation will be established between the Applicant, Metro, and a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. Relocation of the mural in whole to another publicly accessible location within the project area, if conducted in accordance with the guidelines recommended by the National Park Service that are outlined in the booklet "Moving Historic Buildings" by John Obed Curtis (1979), would fully mitigate the impact associated with this historic resource and the proposed project. Additionally, relocation of the mural off-site to a location with similar or compatible historical context (i.e. along a public roadway) would also fully mitigate the impact. However, prior to any relocation efforts the physical condition of the mural should be considered, assessed, and documented by a qualified historic architect and structural engineer. Additionally, the cost of relocation versus the overall historical and artistic value of the mural should be quantified in that assessment, to further evaluate relocation feasibility. The relocation plan shall also be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional. Additionally, the plan shall be reviewed and approved by the Deputy Historic Preservation Officer of the City of Los Angeles' Planning Department. Because this mitigation, with the recommended cost to Applicant limitation, would not directly or indirectly affect the objectives of the proposed project, it appears feasible.

(2) Accidental Discovery of Human Remains or Vertebrate Fossil Resources

West Los Angeles Transportation Facility

Mitigation Measure WLA-C.1: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-than-significant levels.

[2] *Effective July 1, 2004, the City Planning Department has taken over functions previously performed by the Cultural Affairs Department.*

Mitigation Measure WLA-C.2: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels.

Sunset Avenue Project

Mitigation Measure Sunset-C.3: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-than-significant levels.

Mitigation Measure Sunset-C.4: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. Under CEQA, the recommended mitigation measures would reduce the potential adverse impacts of accidental discovery of the unknown, unanticipated vertebrate, fossil or traditional burial resources to less-than-significant levels.

Sunset Avenue Project. The recommended mitigation measures would reduce the potential adverse impacts on the recognized cultural resource (the MIA/POW Mural) and the

accidental discovery of the unknown, unanticipated vertebrate, fossil or traditional burial resources to less-than-significant levels.

Combined Projects. Considering both projects will have no adverse impacts after implementation of mitigation measures, neither the proposed projects would contribute to a combined impact.

4. Geology/Seismic Hazards

a. Project Impacts

West Los Angeles Transportation Facility. Topographically, the site and the surrounding area are relatively level with an elevation of approximately 79 feet above sea level. Additionally, the site has been used for light industrial purposes for approximately 52 years, hence the site has been graded and altered several times over that time period. No prominent or distinct geologic features, such as hillsides, canyons, rock outcrops or ravines exist on the site. As such, the project would not destroy, permanently cover, or materially or adversely modify any distinct and prominent geologic or topographic features.

Similar to development throughout southern California, implementation of the project would result in exposure of people on-site to groundshaking and other seismic hazards, including liquefaction and lateral spreading. Therefore, the proposed project would be constructed in accordance with applicable provisions of the Uniform Building Code (UBC) and would be designed to meet structural requirements as defined by the southern California Seismic Zone IV standards. Further, project designs would comply with structural design standards as defined by Los Angeles Municipal Code (LAMC) and site preparation requirements identified in the geotechnical study prepared for this Draft EIR. As such, implementation of these design standards and regulations would reduce the potential for seismic activity to result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury to acceptable, less than significant levels. Therefore, impacts related to geology/seismic hazards would be less than significant. Further analysis of geotechnical impacts is provided in Section IV.D of this Draft EIR.

Sunset Avenue Project. The site and the surrounding area is a dense urban landscape where elevations range from approximately 20 to 30 feet above sea level. Developed since 1901, the site has been a rail yard for Los Angeles Pacific Electric and a bus facility for approximately 103 years. Hence, the site has been graded and altered several times over that time period. No prominent or distinct geologic features, such as hillsides, canyons, rock outcrops or ravines exist on the site. As such, the project would not destroy, permanently cover, or materially or adversely modify any distinct and prominent geologic or topographic features.

Similar to development throughout southern California, implementation of the project would result in exposure of people on-site to groundshaking and other seismic hazards, including liquefaction and lateral spreading. Therefore, the proposed project would be constructed in accordance with applicable provisions of the Uniform Building Code (UBC) and would be designed to meet structural requirements as defined by the southern California Seismic Zone IV standards. Further, project designs would comply with structural design standards as defined by Los Angeles Municipal Code (LAMC) and site preparation requirements identified in the geotechnical study prepared for this Draft EIR. As such, implementation of these design standards and regulations would reduce the potential for seismic activity to result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury to acceptable, less than significant levels. Therefore, impacts related to geology/seismic hazards would be less than significant. Further analysis of geotechnical impacts is provided in Section IV.D of this Draft EIR.

Combined Projects. Due to the geographic distance between the two projects and their distinct set of related projects, it is determined that after mitigation there are no combined impacts from either construction or operation of the two sites in relation to geologic or seismic hazards.

b. Cumulative Impacts

Numerous related projects have been identified related to both the West Los Angeles Transportation Facility and the Sunset Avenue Project. To assess cumulative impacts of related project development and their potential affects upon distinct and prominent geologic or topographic features, aerial photographs of each project were studied in relation to the related projects maps provided in Section IV.I., Transportation and Circulation. Related projects to be developed near the West Los Angeles Transportation Facility are all located on currently developed land. The aerial shows that the related project sites are currently developed as industrial, commercial/office, or residential uses. None of the sites are currently vacant or in an undeveloped state. Similarly, related projects for the Sunset Avenue site are also to be located in developed areas. The aerial shows that urban development is continuous from the City of Santa Monica through to Los Angeles County's Marina del Rey Small Craft Harbor. A few areas that did not have structures were developed as at-grade parking lots, parks, or golf courses. This analysis has determined that the related projects and the proposed projects of this EIR would all be located on sites that have been altered by urban development. If any of these locations had distinct and prominent geologic or topographic features in the past, then they have been long removed. Therefore, the proposed and related projects analyzed in this EIR would not result in landform alterations that would have adverse cumulative impacts.

With regard to geologic hazards, one related project to the West Los Angeles Transportation Facility located at 3525 Eastham Drive would also be developed within a delineated Alquist-Priolo Fault Hazard Zone. Similar to West Los Angeles Transportation Facility, this related project would need to prepare a Fault-Rupture Assessment to determine if the site is located on a Holocene fault-rupture and have the assessment approved by the State Geologist with the California Geologic Survey. Additionally, all related projects for both the West Los Angeles Transportation Facility and the Sunset Avenue Project would need to comply with Uniform Building Code design standards for southern California Seismic Zone IV. Implementation of applicable provisions of the UBC, as well as all mitigation measures that are required pursuant to the geotechnical studies prepared for each related project, would reduce potential cumulative impacts that could result in risk of injury to people to acceptable, less than significant levels.

c. Mitigation Measures

West Los Angeles Transportation Facility. With regard to seismic hazards, numerous mitigation measures for preparation of the West Los Angeles Transportation Facility site are recommended as follows:

Mitigation Measure WLA-D.1: Remove all loose soil and other deleterious materials, including old foundations, prior to fill placement.

Mitigation Measure WLA-D.2: A minimum of three feet of soil should be removed and recompacted as structural fill before support footings and slab-on-grade construction begins.

Mitigation Measure WLA-D.3: The exposed bottom of removal areas should be scarified, mixed, and moisture conditioned to a minimum depth of 8 inches.

Mitigation Measure WLA-D.4: To reduce risk of foundation movement, it is recommended that footings be supported on structural fill or on deepened piles embedded into competent alluvium, not both.

Mitigation Measure WLA-D.5: If the excavation to remove existing subsurface structures, pipelines, and loose fill soils extends below the minimum depth of over-excavation, it is recommended that all subsurface structures, utility lines, and uncontrolled fill extending below the over-excavation depth be removed to expose undisturbed, native soils across the entire building pad.

Mitigation Measure WLA-D.6: All fill material should be placed in controlled, horizontal layers with optimum depth and moisture.

Mitigation Measure WLA-D.7: Excavated soils, cleaned of deleterious materials (including rocks), can be re-used for fill.

Mitigation Measure WLA-D.8: Each layer of fill under the building area within the upper 48 inches of the finished pad grade should be of similar composition to provide a relatively uniform expansion index beneath the building.

Mitigation Measure WLA-D.9: Materials to be used as compacted fill should be analyzed by the Geotechnical Engineer to determine the physical properties of the materials.

Mitigation Measure WLA-D.10: An evaluation of the consequences related to lateral settlement of the project's proposed structure is recommended.

Mitigation Measure WLA-D.11: Prior to the start of the site preparation and/or construction. It is recommended that there be a meeting with the selected contractor and Advanced Geotechnical Services, Inc., to further discuss tasks related to the backfill of utility trenches, temporary excavations, foundation types and their installation, slab-on-grade, retaining wall design, drainage, structural pavement sections, and corrosive protection.[3]

Sunset Avenue Project.

Mitigation Measure Sunset-D.1: Remove all loose soil and other deleterious materials, including old foundations, prior to fill placement.

Mitigation Measure Sunset-D.2: In areas to receive fill or to support slab-on-grade construction, a minimum of eight feet of the existing soils should be removed and recompacted as the structural fill in the proposed construction areas.

Mitigation Measure Sunset-D.3: The exposed bottom of removal areas should be scarified, mixed, and moisture conditioned to a minimum depth of 8 inches

[3] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Facility, October 23, 2003.*

Mitigation Measure Sunset-D.4: If the excavation to remove existing subsurface structures, pipelines, and loose fill soils extends below the minimum depth of over-excavation, it is recommended that all subsurface structures, utility lines, and uncontrolled fill extending below the over-excavation depth be removed to expose undisturbed, native soils across the entire building pad.

Mitigation Measure Sunset-D.5: All fill material should be placed in controlled, horizontal layers with optimum depth and moisture.

Mitigation Measure Sunset-D.6: To reduce risk of foundation movement, it is recommended that footings be supported on structural fill, and that the thickness of structural fill beneath the footings and the slab area be relatively uniform.

Mitigation Measure Sunset-D.7: Due to the high moisture content, shallow groundwater, and high compressibility of the on-site native soil, additional stabilization methods may be required. Acceptable stabilization methods include: (1) float rock worked into the soft soils and covered with a filter fabric; (2) geofabric with a 24-inch-wide overlap between sheets; or (3) a combination of both.

Mitigation Measure Sunset-D.8: If construction delays or the weather result in the drying of the fill surface, the surface should be scarified and moisture conditioned before the next layer of fill is added. Each new layer of fill should be placed on a rough surface so planes of weakness are not created in the fill.

Mitigation Measure Sunset-D.9: Excavated soils, cleaned of deleterious materials (including rocks), can be re-used for fill.

Mitigation Measure Sunset-D.10: Each layer of fill under the building area within the upper 24 inches of the finished pad grade should be of similar composition to provide a relatively uniform expansion index beneath the building.

Mitigation Measure Sunset-D.11: Materials to be used as compacted fill should be analyzed by the Geotechnical Engineer to determine the physical properties of the materials.

Mitigation Measure Sunset-D.12: An evaluation of the consequences related to lateral settlement of the project's proposed structure is recommended.

Mitigation Measure Sunset-D.13: Prior to the start of the site preparation and/or construction. It is recommended that there be a meeting with the selected contractor and

Advanced Geotechnical Services, Inc., to further discuss tasks related to the backfill of utility trenches, temporary excavations, shallow foundations, slab-on-grade, retaining wall design, and drainage.[4]

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. With implementation of the recommended mitigation measure, significant geotechnical impacts associated with grading and site design and seismic hazards would not occur as a result of the proposed project.

Sunset Avenue Project. Implementation of the recommended mitigation measure, significant geotechnical impacts associated with grading and site design and seismic hazards would not occur as a result of the proposed project.

Combined Projects. Due to the geographic distances between the two sites it is determined that there would be no combined impacts after mitigation measures are implemented on each site. Hence, the level of significance after mitigation at both locations would reduce the potential for geologic hazards to acceptable, less-than-significant levels.

5. Hazardous Materials

a. Project Impacts

West Los Angeles Transportation Facility. Based on the results of the site's exploration and laboratory analyses, shallow soil impacts from total recoverable petroleum hydrocarbons (TRPHs) are limited in lateral and vertical extent and can be removed or treated on-site and do not require remediation. Low detections of acetone in soil samples do not require further investigations as Environmental Support Technologies, Inc. (EST) has determined that the existing constituents will naturally degrade. Low isolated areas of soil and groundwater detections of total volatile petroleum hydrocarbons-gasoline (TVPHg), aromatic hydrocarbons, and fuel oxygenates (i.e., methyl tert butyl ether (MTBE) and tert amyl methyl ether (TAME)) are associated with unknown sources. Low concentrations of TVPHg, aromatic hydrocarbons, and fuel oxygenates in the soil or groundwater do not pose a significant risk to human health or the environment and do not warrant further assessment or remediation.

[4] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed Multi-Family Residential, February 13, 2004.*

Although on-site uses have not resulted in significant impacts to soils or groundwater resources, a known northwest trending gasoline plume from a location southeast of the project site may result in a future adverse impact on groundwater resources beneath the project site.[5] Remediation of the plume is on-going, but groundwater beneath the site could be adversely affected by TRPH, MTBE, and aromatic hydrocarbons. However, as the plume is not related to the construction or operation of the site, and construction activities would not require deep excavation that would encounter the underlying groundwater. No adverse impacts from hazardous materials would result from development of the project.

Sunset Avenue Project. Soil analyses and laboratory investigations indicate that oil and grease related TRPHs are present in the near-surface soils in numerous areas of the site, as well as in deeper soils around the existing fuel island. However, the Streamlined Risk Assessment has determined that the chemicals of potential concern (COPCs) would not have a significant impact on either human health or the environment.[6]

Groundwater analyses detected chloroform and 1,4-dioxane in two of the four samples. These detections are isolated and appear minor. According to the Streamlined Risk Assessment, the presence of the chloroform and 1,4-dioxane had no associated source(s) detected in the soil or soil vapor investigation. Chloroform sources cited in the United States Public Health Service Web Page (http://www.eco-usa.net/toxics/chcl3.shtml) indicates that usual sources of chloroform releases are chemical companies, paper mills, and wastewater from sewage treatment plants. None of those land uses are associated with the Metro Division 6 property. Therefore, as no such COPCs were detected in the soil samples and as no such associated land uses that would generate such substances are present on the project site, no significant impact to groundwater would occur. No further analysis is required.

Combined Projects. Both the West Los Angeles Transportation Facility and the Sunset Avenue project sites have been determined to be candidates for case closure by the Los Angeles Regional Water Quality Control Board.[7] Consequently, the LARWQCB has granted case closure on the Sunset Avenue site as of August 10, 2004.[8] Neither site has significant levels of hazardous materials in either the soils or groundwater, thus, they would have no combined impacts. No further analysis is required.

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[5] *Telephone communication with Kirk Thompson, Registered Hydrogeologist and Environmental Assessor for Environmental Support Technologies, Inc., May 11, 2004.*

[6] *MACTEC, Final Report – Streamlined Risk Assessment. August 17, 2004.*

[7] *Environmental Support Technologies, Inc., Phase II Site Assessment, November 18, 2003; MACTEC, Draft Final Report – Streamlined Risk Assessment. April 16, 2004.*

[8] *California Regional Water Quality Control Board-Los Angeles Region, Underground Storage Tank Program Case Closure Division 6 100 Sunset Avenue, Venice (ID# 902910152), August 10, 2004.*

b. Cumulative Impacts

West Los Angeles Transportation Facility. The existing contaminated soils on the West Los Angeles Transportation Facility can be treated through removal or on-site treatment. Hence, development of this site would not contribute a cumulative impact related to exposure of people to a health hazard. However, operation of the project would require the daily use and storage of hazardous materials, which may, in connection to related projects, have the potential to contribute to a cumulative risk to people or property as a result of a potential accidental release or explosion of a hazardous substance. Of the 11 sites identified as related projects (see Section III.B, Related Projects, and Section IV.I, Transportation and Circulation) to the Transportation Facility, one other location has the potential to contribute to cumulative impacts related to hazardous materials. A 250,000-sq.ft. industrial project is planned within the City of Culver City to be located at 10100 Jefferson Boulevard. As an industrial use, there is potential for this related project to have hazardous materials on-site. Should this related project store higher than threshold quantities of hazardous materials as defined by Chapter 6.95 of the California Health and Safety Code, then this project would be required to file an Accidental Risk Prevention Program with the City of Culver City Fire Department, which would contain information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. Further, employees and contracted service providers who would potentially be exposed to hazardous waste would be required under OSHA and Cal/OSHA to be trained and certified to handle hazardous waste and materials. As this related project and the Transportation Facility would comply with these Federal and State regulations, the probable frequency and severity of cumulative consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance would be reduced to a less-than-significant level. Further, this related project and the Transportation Facility would develop and implement Accidental Risk Prevention Programs with the City of Culver City Fire Department and LAFD, respectively. Implementation of these federal, State, and local requirements would also reduce the potential for the related project and the Transportation Facility to result in cumulative impacts that would interfere with existing response or evacuation plans to a less-than-significant level.

Sunset Avenue Project. TRPHs in the soils and chloroform and 1,4-dioxane in the groundwater have been determined to not be present in significant concentrations, thus there are no significant impacts from hazardous materials on the site. Further, the LARWQCB has granted case closure on the Sunset Avenue site as of August 10, 2004.[9] However, the existing Underground Storage Tanks (USTs) and the stored hazardous materials that exist on-site would be removed to prepare the site for redevelopment. Removal of these structures and hazardous

[9] *California Regional Water Quality Control Board-Los Angeles Region, Underground Storage Tank Program Case Closure Division 6 100 Sunset Avenue, Venice (ID# 902910152), August 10, 2004.*

materials could result in consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance. Additionally, related projects that may be developed during a similar timeframe, could result in the potential for a cumulative impact related to hazardous substances. Of the 21 identified related projects in proximity to the Sunset Avenue site (see Section III.B, Related Projects, and IV.I, Transportation and Circulation), one project has the potential to contribute to a cumulative impact. Within the City of Los Angeles, a gasoline station and mini-mart is proposed to be developed at 2005 Lincoln Boulevard. If developed concurrently, each site would potentially be handling and transporting hazardous materials and USTs. However, each site would comply with OSHA and Cal/OSHA regulations that require employees and contracted service providers to be trained and certified to handle hazardous waste and materials. Further, this related project would be required to develop and implement an Accidental Risk Prevention Program pursuant to Chapter 6.95 of the California Health and Safety Code and file with LAFD. The Accidental Risk Prevention Program would contain information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. Implementation of these Federal, State, and local requirements would reduce the potential for the related project and the Sunset Avenue Project from resulting in cumulative impacts that would result in an accidental release or explosion of a hazardous substance or interfere with existing response or evacuation plans to a less-than-significant level.

c. Mitigation Measures

West Los Angeles Transportation Facility.

Mitigation Measure WLA-E.1: Soils impacted with TRPH concentrations of 1,000 mg/Kg or greater shall be excavated during the grading for the proposed project.

Sunset Avenue Project.

Although no significant impacts associated with emergency response and evacuation would occur, the following mitigation measure is proposed to ensure emergency response and excavation is not significantly impacted during construction of the project:

Mitigation Measure Sunset-E.1: A Transportation Plan will be developed for the hauling of soil and debris from the project site.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. Implementation of the mitigation measures identified above would clear the Transportation Facility site of the existing contaminated soils. Once removed, the project would reduce the frequency of exposure or severity of consequences to people of exposure to health hazards to a less-than-significant level.

Sunset Avenue Project. No mitigation is required related to hazards or hazardous materials.

Combined Projects. Development of the West Los Angeles Transportation Facility and the Sunset Avenue projects would not result in significant impacts related to hazards or hazardous materials.

6. Water Quality

The analysis of water quality presented in this EIR regards the West Los Angeles Transportation Facility only. It was determined in the Initial Study that redevelopment of the Sunset Avenue project would have beneficial surface and groundwater quality effects. Although the Division 6 facility is in compliance with the waste load allocation (WLA) requirements of the NPDES Industrial Activities Storm Water Discharge permit (Order No. 97-03-DWQ), discharges of storm water runoff from the site are treated to the maximum extent practicable. Thus, insignificant amounts of industrial pollutants are discharged from the site, usually under intense weather conditions. Therefore, by redeveloping the site as a residential use, the project would comply with a NPDES Municipal Storm Water and Urban Runoff permit (Order No. 01-182) and the Standard Urban Storm Water Mitigation Plan (SUSMP). Both the NPDES permit and the SUSMP ensure that storm water is treated on-site to reduce the level of typical residential pollutants (i.e., fertilizers and pesticides) to the maximum extent practicable. Hence, the beneficial effect on storm water quality would be related to replacing this industrial use with a residential use, which even under intense weather conditions would discharge fewer pollutants of a lower intensity than the Division 6 site.

a. Project Impacts

West Los Angeles Transportation Facility.

Construction. Construction of the project would first require the demolition and the clearing of the entire 4.66-acre site. Clearing of the site would expose all underlying soils to potential erosion, transportation via storm water, or direct contact with pollutants. Erosion and

transport of these soils from the site could adversely affect surface water quality, while pollutants could migrate through the exposed soils into the groundwater beneath the site. Additionally, construction activities and exposure of construction materials may also lead to surface or groundwater pollution.

Adherence to the Best Management Practices (BMPs) required by the National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit and those identified in the Storm Water Pollution Prevention Plan (SWPPP) associated with the permit, would reduce the potential for construction materials and soils exposed during the grading and construction process from being transported off-site and into nearby storm water drainage infrastructure or from potentially percolating through the soils into the groundwater. Hence, through construction scheduling, proper use and maintenance of BMPs, and compliance with SWPPP guidelines, the project would not violate regulatory standards as identified in the NPDES permit or the Basin Plan for storm water discharges to receiving surface or groundwaters.

Operation. During the project's operational phase, the Transportation Facility would include a bus and chassis washing area, a CNG fueling station, bus maintenance bays, trash and vacuum containers, and open surface parking for both buses and employee vehicles. These uses have potential to adversely effect surface water quality. To specifically address the runoff from the bus and chassis washing area, a reclamation area would be located adjacent to the wash bays that would recycle the water to be reused on-site. Further, compliance with the requirements of the State NPDES Industrial Activities Permit and SWPPP, along with the City of Los Angeles' Standard Urban Storm Water Mitigation Plan (SUSMP) would ensure that the project's operational activities, the type and placement of BMPs, and monitoring of the site's storm water runoff would result in no significant impact on water quality.

During the operational phase of the project, the majority of the 4.66-acre site would be covered by impervious surfaces. This would act as an effective barrier between storm water and other nuisance waters from percolating into the soils. By barring percolation, the potential for waters from the site to reach groundwater resources would be eliminated. As this is not a significant change in relation to the site's existing impervious conditions, impeding percolation of storm and/or nuisance waters would not result in an adverse effect on groundwater recharge. Additionally, water to be used on-site would be delivered via water utility lines provided by the City of Los Angeles Department of Water and Power. No direct use of groundwater resources would occur on the project site. Therefore, the project would have no adverse impacts on groundwater levels.

b. Cumulative Impacts

West Los Angeles Transportation Facility. Eleven related projects have been identified in proximity to the proposed West Los Angeles Transportation Facility site. The eleven projects fall into one of four categories: industrial, transportation, office, or residential. These urban development projects could potentially contribute point and non-point source pollutants to the surface or groundwater resources, resulting in a cumulative impact to water quality. However, all of the related projects would also be subject to State NPDES permit requirements for both construction and operation, including developing SWPPPs. Development of SUSMPs is dependant on a project's location within the City of Los Angeles. Regardless of location, each project would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to surface and groundwater quality. Thus, cumulative impacts to water quality would be less than significant.

c. Mitigation Measures

West Los Angeles Transportation Facility. The proposed project would comply with all standards, guidelines, and requirements of the State NPDES Construction Activities and Industrial Permits, and City of Los Angeles requirements as part of these regulations. The SWPPP and a SUSMP would be developed specifically for the project site to address the individual characteristics of the site's needs to treat potential storm water contamination. Compliance with these requirements is mandated by law to ensure that impacts to surface and groundwater quality are reduced to less than significant levels. As such, these permits, plans, and BMPs are not considered to be mitigation measures, but integral parts of the project design and operation. Therefore, no mitigation measures are required.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. Compliance with regulatory requirements would ensure that significant impacts to water quality would not occur as a result of the project, and no mitigation measures are required.

7. Land Use

a. Project Impacts

West Los Angeles Transportation Facility. The Transportation Facility Project would provide the development of new uses on the project site that are consistent with the Industrial Use designation) and policies presented in the West Adams-Baldwin Hills-Leimert Community

Plan. The project is consistent with use, density, and height restrictions prescribed under the City's MR1 1VL zoning designation, but the project's front-yard setback may be less than the prescribed 15 feet. However, pursuant to Section 53090 et. seq. of the California Government Code, as the proposed project is a rapid transit facility, Metro is not required to comply with City of Los Angeles zoning regulations for the development of property located in the City of Los Angeles. Metro nevertheless intends that the development of the West Los Angeles Transportation Center comply with City zoning regulations to the maximum extent feasible. Compliance with the full front yard setback requirement of this zone, would require Metro to reduce the proposed number of bus parking spaces, thereby decreasing Metro's ability to effectively serve the central and western portions of its service area. Metro would nevertheless provide the maximum feasible setback along Jefferson Boulevard consistent with Metro's ability to achieve project objectives. Further, pursuant to Section 53090 et. seq., the approximately 72,000 square-foot project would not be subject to Section 16.05 of the Los Angeles Municipal Code, which provides that projects containing 50,000 square feet or more of nonresidential floor area are subject to approval of Site Plan Review by the City.

Implementation of the proposed project would support the Community Plan objectives pertaining to industrial uses and job opportunities, generally; and within existing areas so designated, more specifically. It would also support City Framework Element and SCAG regional policies, related to cost minimization in the provision of infrastructure and provision of services, as well as support for conversion of vehicles to clean fuel/alternative fuel; effectiveness of services, and involvement of the private sector in developing community-level accessibility plans.

The Transportation Facility Project would not be inconsistent with the adopted land use/density designation in the Community Plan for the site; nor would it be inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans. Impacts regarding the regulatory framework would be less than significant.

Implementation of the Transportation Facility Project would alter the project site from its current state, a vacant parcel with three small unused and neglected buildings, to an improved state with the project's bus parking and related maintenance and administration facilities. The project is an in-fill project, light-industrial in use, comparable to and consistent with the light-industrial uses surrounding the project site and located throughout this larger light-industrial/commercial district. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Transportation Facility Project regarding surrounding uses would be less than significant.

Sunset Avenue Project. The Sunset Avenue site is located within the boundaries of the Venice Community Plan, the Venice Local Coastal Program Land Use Plan, and the Venice Coastal Zone Specific Plan, which establish general development policies for the project site, as well as specific regulations regarding use, density, heights and setbacks. They also establish policies and regulations aimed at protecting coastal resources pursuant to the California Coastal Act.

While existing Community Plan and Coastal Plan designations reflect Industrial use and the current zoning is M1, the Specific Plan proposes a re-designation of the site's current M1 zoning to a zone of CM-1. The most direct policy regarding future use of the site, Policy I.C.7 of the Local Coastal Program Land Use Plan, recommends that future development of this site should "… include affordable housing, which may be a mixed-use residential-commercial project, and public parking structure as a measure to improve public access."

The proposed project is a mixed-use project that includes a maximum of 225 residential units, of which 17 units would be designated for very low income households, and 10,000 square feet of commercial use, as well as 71 parking spaces for public use, in accordance with Beach Impact Zone provisions and an additional 44 spaces that could be used to provide fee parking for surrounding residents. Therefore, by virtue of its mixed-use composition inclusive of an affordable housing component and public parking, the proposed project would be consistent with Policy I.C.7. The project's proposed rezoning of the site to CM-1 would be consistent with the intent of the Specific Plan.

Development of the proposed uses would also contribute to various regional policies. It would support SCAG policies and Citywide Framework Element policies that encourage land use patterns with a range of densities, mixed-use development, the development of community centers with a range of uses, and increases in housing availability at a variety of densities and costs, and the establishment of a Community Center in the vicinity of the project site that is designated in the City's Framework Element.

With a maximum of 225 residential units the project's residential density would be consistent with plan density designations (pursuant to the CM zone) as adjusted by plan policies and City regulation that offer density bonuses and other incentives; e.g., increased heights to encourage the provision of affordable housing. The density bonus is 25 percent, and an additional 10 percent is allowed when such housing is located in areas with qualifying characteristics. The later 10 percent bonus would require a plan amendment by the Coastal Commission, upon a showing that the additional density would not have adverse effects on coastal resources. With the inclusion of 17 affordable units for very low-income occupants, the site would have an allowable base CM zone density of 171 units. 214 units would be allowed under the 25 percent bonus, and 231 units would be allowed with the additional 10 percent. A

mitigation measure is included below requiring the plan amendment for any number of units greater than 214.

The project would be consistent with setback requirements, but proposes Specific Plan exceptions for height and FAR. This would allow heights of up to approximately 56 feet, an amount greater than the 35-foot limit and a FAR of approximately 2.0:1 in contrast to the 1.5:1 ratio designated in the plan. An increase in building heights and FAR commensurate with the increase in density should be expected and would be consistent with the intent of the plan policies and regulations. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; nor would it be inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

While project's densities, height and FAR would be consistent with the plan and regulations, when accounting for the encouraged density bonuses, the increase in site density would have certain affects on the physical environment. This increased density has been considered in and has contributed to the conclusions that the proposed project would not have significant impacts on any environmental subject which may be influenced by density, except the aesthetics subject due to project building heights.

The project would not have adverse affects on coastal resources, even with the full application of the density bonuses. The uses would be consistent with those recommended in the certified Coastal Land Use plan, and responsive to coastal policies. The public parking would support public access to the coastal zone and shoreline, in particular. The commercial uses would contribute to the development of Main Street as a visitor-destination. The project would not have adverse affects on visual pedestrian access to coastal resources.

Implementation of the Sunset Avenue Project would convert the project site from its current use as a bus parking and maintenance facility to a developed site with up to 225 residential units and 10,000 square feet of commercial uses, including a health club/spa, coffee shop and retail. While site character and activity would change, the project would not alter the general land use relationships in the area. Main Street and Pacific Avenues would maintain their current transportation functions, and Sunset Avenue and Thornton Avenue would continue to allow neighborhood vehicular access as well as pedestrian access between Main Street and Pacific Avenue. As infill development, the proposed project would continue existing development patterns in the immediate locale. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Sunset Avenue Project regarding surrounding uses would be less than significant.

Combined Projects. Potential adverse land use impacts associated with each of the projects are based on local conditions and the specific development proposals at each of the development sites. Therefore, the impacts are as reported for the Transportation Facility and Sunset Avenue Projects, independently. Their relationship to applicable regulations occurs in different Community Plan areas, and the proposed developments are neither large enough, nor sufficiently proximate to combine in affecting the overall urban form.

At the same time, it may be noted that implementation of each of the projects is interrelated. The net effect is to allow relocation of an infrastructural type of use into an area that is more distant from residential areas, and outside of the coastal zone. In combining the two projects, an opportunity is created for Metro to meet its obligations for supporting public transit, without having to rely on eminent domain, relocation of existing uses, or seeking amendments to existing plans. Thus, the combined projects are supportive of policies that encourage innovative solutions, efficiency in the provision of public transit services and private/public partnerships in furthering land use goals and policies.

b. Cumulative Impacts

Each of the proposed projects is located in a different community with impacts affected by a different set of related projects and local regulations. The changes in land use impacts and potential cumulative changes are localized in nature and would not involve alterations in the larger-scale regional form. Impacts of the two projects would not have combined effects with regard to land use.

The proximity of related projects to the two project sites is limited. Related projects would typically be in-fill projects at more distant locations than would be required to comply with local regulations. The nearest related project that could potentially have land use effects, is the Exposition LRT line that would pass north of the Transportation Facility site with a station located at the intersection of Jefferson Boulevard and La Cienega Boulevard. This project would include mitigation measures to address land use issues related to neighborhood effects and displacement and relocation; and would reduce potential impacts of that project to less than significant. Therefore, the proposed project would not combine with other projects in affecting the regulatory framework nor the patterns of local development.

Therefore, the proposed projects would not contribute to a cumulative inconsistency with the adopted land use/density designation in the Community Plans, redevelopment plans or specific plan; nor would they contribute to a cumulative inconsistency with the General Plan or adopted environmental goals or policies contained in other applicable plans. The projects would not contribute to a cumulative affect that would cause the disruption, division or isolation of an

existing neighborhood, community or land use. Cumulative impacts would be less than significant.

c. Mitigation Measures

West Los Angeles Transportation Facility. With implementation of the West Los Angeles Transportation Facility, land use impacts would be less than significant and no mitigation measures would be required.

Sunset Avenue Project. The following mitigation measures are recommended to ensure that the Sunset Avenue Project is consistent with the Local Coastal Land Use Plan.

Mitigation Measure Sunset-G.1 The total number of units and market/affordable mix shall be consistent with California Code Section 65915, as reflected in LUP Policy I.A.13 (a).

Mitigation Measure Sunset-G.2 Any number of units in addition to 214 shall only be allowed upon a certified LCP amendment, based on a finding that no adverse impacts on coastal resources would result per LUP Policy 1.A.13 (d).

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. The Transportation Facility Project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site, nor would it be inconsistent with the General Plan or adopted goals or policies contained in other applicable plans. Therefore, impacts regarding the regulatory framework would be less than significant.

The Transportation Facility Project would be an in-fill project contributing to the over-all form of the light-industrial/commercial area in which it is proposed. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Transportation Facility Project regarding surrounding uses would be less than significant.

Sunset Avenue Project. The Sunset Avenue Project would be compatible with the overall aims of applicable plans and therefore considered not to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan,

redevelopment plan or specific plan for the site, nor would it be inconsistent with the General Plan or adopted goals or policies contained in other applicable plans. Therefore, impacts of the Sunset Avenue Project regarding the regulatory framework would be less than significant.

The Sunset Avenue Project would be an in-fill project placing residential uses amidst existing and anticipated residential uses. It would not alter the activities along Main Street, contributing to its mixed-use character, or activities along Pacific Avenue. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Sunset Avenue Project regarding surrounding uses would be less than significant.

8. Noise

a. Project Impacts

West Los Angeles Transportation Facility. Project construction would require the use of mobile heavy equipment with high noise level characteristics. Noise levels from on-site construction activity would result in a marginal noise level increase of 2 dBA L_{eq} at the closest sensitive land use (i.e., Syd Kronenthal Park) in comparison to the construction-period incremental noise significance criterion of 5 dBA. At the nearest residence location (within Blair Hills) that has a direct line-of-sight to the project site, construction-period noise would result in a maximum noise level increase of 3 dBA L_{eq}, which is also less then the 5 dBA significance criterion. Noise level increases would be less at all other noise-sensitive receiver locations due to greater sound-distance attenuation benefit and/or higher baseline ambient sound conditions. As such, short-term on-site construction noise impacts would be less than significant. With respect to impact pile driving, ground borne vibration would be approximately 0.124 inch per second peak particle velocity (PPV) at a distance of 75 feet from the source. As no structures are present within 75 feet of potential pile driving activity, potential vibration impacts would be well below the 0.2 inch per second PPV significance threshold. Vibration impacts associated with construction would be less than significant and no mitigation measures are required.

During the operational phase, traffic related to the project would not result in an increase in the CNEL along any roadway segment by 5 dBA or 5 dBA L_{eq} during the project peak hour. In addition, project-related operational (i.e., non-roadway) noise sources, including idling buses, backup alarm beeps, a bus wash operation, and air compressor machines, would not increase ambient noise by 5 dBA and would be in compliance with the City Noise Ordinance. Noise levels from on-site activity would result in a marginal noise level increase of 0.3 dBA and 1.9 dBA to the daytime and nighttime ambient sound levels, respectively, at the closest sensitive land use (i.e., Syd Kronenthal Park). At the nearest residence location (within Blair Hills) that has a direct line-of-sight to the project site, noise from on-site activity would result in a marginal

increase of 0.7 dBA and 1.5 dBA to the daytime and nighttime ambient sound level, respectively. Noise level increases would be less at all other noise-sensitive receiver locations due to greater sound-distance attenuation benefit and/or higher baseline ambient sound conditions. As noise level increases would not exceed the 5-dBA significance criterion, impacts related to on-site facility noise levels would be less than significant. No mitigation would be necessary.

Sunset Avenue Project. Noise levels from on-site construction activity would exceed the construction-period noise significance criterion by adding 5 dBA or more to ambient noise levels at property locations immediately surrounding the project site prior to implementation of feasible mitigation measures. With respect to impact pile driving, ground borne vibration would be approximately 0.124 inch per second PPV at a distance of 75 feet from the source. As structures are present within 75 feet of potential pile driving activity, potential vibration impacts would exceed the 0.2 inch per second PPV significance threshold without incorporation of mitigation measures.

During the operational phase, traffic related to the project would not result in an increase in the CNEL along any roadway segment by 5 dBA. In addition, project-related operational (i.e., non-roadway) noise sources would not increase ambient noise by 5 dBA and would be in compliance with the City Noise Ordinance. As noise level increases would not exceed the 5-dBA significance criterion, impacts related to on-site facility noise levels would be less than significant. No mitigation would be necessary.

Combined Projects. There would be no construction activity overlap occurring at the Transportation Facility and Sunset Avenue project site locations. In addition, the project sites are located approximately 6 miles apart. Noise events that occur at one site location would thus have no effect on the noise environment that surrounds the other site location. As such, impacts would be less than significant.

The project sites are located approximately 6 miles apart. Noise events that occur at one site location would thus have no effect on the noise environment that surrounds the other site location. In addition, there is sufficient distance between the two project site locations such that the “areas of potential effect” for roadway noise impacts are mutually exclusive. As such, impacts would be less than significant.

b. Cumulative Impacts

Traffic volumes from the proposed project and 32 related projects (i.e., 11 related projects in the area surrounding the Transportation Facility site location and 21 related projects in the area surrounding the Sunset Avenue site location), combined with ambient growth traffic, would result in a maximum increase of 0.7 dBA CNEL in areas subject to noise exposure

deemed "conditionally unacceptable" or "normally unacceptable," and result in a maximum increase of 3.3 dBA CNEL in areas subject to noise exposure deemed "normally acceptable."

In addition to noise from the related projects discussed above, long-term operation of the Mid-City/Exposition Light Rail Transit (LRT) alignment (which is anticipated to be operational in year 2012) would also add to cumulative noise exposure along Jefferson Boulevard near the Transportation Facility site location. Based on the noise analysis published in the Mid-City/Westside Transit Draft EIS/EIR and using FHWA RD-77-108 calculation procedures to adjust for distance, noise exposure from long-term LRT operation would be approximately 56 dBA CNEL at the closest noise-sensitive location (Syd Kronenthal Park) and 66 dBA CNEL at the industrial uses that are immediately adjacent to the LRT alignment. The overall cumulative impact (i.e., noise from project, related projects, and ambient growth traffic volumes, and noise from the LRT alignment) would be 4.3 dBA CNEL and 4.7 dBA CNEL at the Syd Kronenthal Park and adjacent industrial use locations, respectively.[10] The cumulative noise increases would not exceed the 5 dBA significance threshold. As such, cumulative roadway and LRT noise impacts would be less than significant

Due to City of Los Angeles Municipal Code provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project.

c. Mitigation Measures

West Los Angeles Transportation Facility. Although no significant impacts associated with construction or operation of the Transportation Facility were identified, the following mitigation measures are prescribed to implement measures requested in the Motion by Supervisor Yvonne B. Burke on Agenda Item No. 26, dated September 25, 2003:

Mitigation Measure WLA-H.1: The composite noise level emanating from the Transit Facility shall not exceed 84 dBA when measured at a distance of 25 feet from the site perimeter between the hours of 9:00 P.M. and 7:00 A.M.

Mitigation Measure WLA-H.2: Employees shall not congregate in the roof-top parking area between the hours of 9:00 P.M. and 7:00 A.M. Signs stating such a message shall be posted conspicuously throughout the roof-top parking facility area.

[10] *Refer to Appendix E (Noise) for supporting calculations.*

Mitigation Measure WLA-H.3: Employees shall not activate car alarms in the roof-top parking area between the hours of 9:00 P.M. and 7:00 A.M. Signs stating such a message shall be posted conspicuously throughout the roof-top parking facility area.

Sunset Avenue Project. Mitigation Measures H-1 through H-7 implement mitigation measures to reduce potentially significant construction impacts.

Mitigation Measure Sunset-H.1: Prior to the issuance of any grading, excavation, foundation, or building permits, the Applicant shall ensure that all construction documents require contractors to comply with Los Angeles Municipal Code Section 41.40 which requires all construction and demolition activity located within 500 feet of a residence to occur between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday;

Mitigation Measure Sunset-H.2: In the event pile driving is required, pile drivers shall be equipped with noise control having a minimum quieting factor of 10 dBA;

Mitigation Measure Sunset-H.3: To the extent feasible, loading and staging areas must be located on site and away from noise-sensitive uses surrounding the project site;

Mitigation Measure Sunset-H.4: Heavy-duty trucks shall utilize a City-approved haul route that avoids noise-sensitive land uses to the maximum extent feasible;

Mitigation Measure Sunset-H.5: During periods of active construction activity, an eight-foot temporary sound barrier (e.g., wood fence) shall be erected around the site perimeter such that the "line of sight" between construction activity and adjacent residential properties is obstructed;

Mitigation Measure Sunset-H.6: All pile driving within 75 feet of any off-site adjacent structure shall be conducted with equipment such as sonic pile driver, or similar type of equipment, which generates a level of ground-borne vibration that is less than 0.2 inch per second of peak particle velocity at a reference distance of 50 feet; and

Mitigation Measure Sunset-H.7: All exterior walls, floor-ceiling assemblies (unless within a unit) and windows having a line of sight (30 degrees measured from the horizontal plane) of Pacific Avenue or Main Street shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the UBC Standard No. 35-1, 1982 edition. City of Los Angeles sign-off shall be required prior to obtaining a building permit. The Applicant, as an alternative, may retain an engineer registered in the State of California with

expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the City of Los Angeles which achieves a maximum interior noise of CNEL 45 dBA (Residential).

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. No significant impacts associated with construction or operation of the Transportation Facility were identified.

Sunset Avenue Project. Mitigation Measures Sunset-H.1 through Sunset-H.5 would reduce noise impacts during construction by 3 to 10 dBA at areas immediately adjacent to the project site. However, noise levels would continue to exceed the 5-dBA significance criterion at residential properties that are located immediately north of the project site across Sunset Avenue, east of the project site across Main Street, south of the project site across Thornton Place, and west of the project site across Pacific Avenue.

Mitigation Measure Sunset-H.6, identified above, would reduce potential impacts from ground-borne vibration during construction to a level that is less than significant.

Mitigation Measure Sunset-H.7, identified above, would ensure that interior noise within residential dwellings meet adopted City standards. As such, potential impacts with respect to community noise exposure/land use compatibility would be less than significant.

9. Transportation and Circulation

a. Project Impacts

West Los Angeles Transportation Facility. During construction, the West Los Angeles Transportation Facility would generate traffic from construction equipment, crew, vehicles, haul trucks and delivery vehicles. In general, construction hours and days are planned to occur from 7 A.M. to 3 P.M., Monday through Friday with occasional overtime hours and some weekends. Since construction workers' trips would occur outside of the morning and afternoon peak hours, construction impacts from this particular type of traffic activity would be less than significant.

As indicated in the traffic analysis, a short-term adverse traffic impact may occur in the immediate area during the busiest construction phases. Excavation activity at the project site would be limited and construction impacts would be less than significant. Nonetheless, Work Area Traffic Control Plans are typically advised in construction projects, to minimize non-significant adverse impacts, and to assure that significant impacts do not occur. Therefore mitigation measures are proposed, requiring a Work Area Traffic Control Plan that includes

traffic control measures, signs, delineators and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.

During operation, it is estimated that the Transportation Facility would generate an average of 1,666 vehicle trips per day with 107 peak-hour morning trips and 103 peak-hour afternoon trips at the project driveways.[11] Bus traffic occurs throughout the day and, as such, has less impact during A.M. and P.M. peak hours than typically occurs with other uses. None of the study intersections analyzed are impacted by project traffic volume using the significant impact criteria established by LADOT. Since none of the project impacts exceed the significance threshold, less than significant traffic impacts would occur.

However, a potentially significant bus routing impact has been identified at the intersection of Jefferson and La Cienega Boulevards due to the physical roadway constraints at this intersection. Inbound buses traveling southbound on La Cienega Boulevard may have a difficult right-turn maneuver to westbound Jefferson Boulevard. The travel path of the southbound bus would need to encroach into the adjacent through lane to negotiate this southbound right turn. Test runs have been made by Metro and it has been determined that the buses can negotiate the turn, but it is restricted. At peak times, this intersection is congested and this right turn could present an operating challenge. A mitigation measure is recommended to alleviate the operating challenge.[12] The proposed mitigation measure would also increase the storage capacity of the left-turn lane for eastbound Jefferson Boulevard travelers onto northbound La Cienega Boulevard to accommodate additional project traffic.

Sunset Avenue Project. As with the Transportation Facility, construction equipment, crew vehicles, haul trucks and delivery vehicles would generate traffic during construction activities. Construction workers' trips would occur outside of the morning and afternoon peak hours, and therefore, construction impacts from this type of traffic activity would be less than significant. Construction would include the export of approximately 125,000 cubic yards of material. During the early stages of the grading operation, it is estimated that moving this amount of material would generate up to approximately 100 truckloads per day, or

[11] *Each bus was converted to an equivalent number of passenger cars PCE. to account for the additional space occupied and operating capabilities compared to passenger cars. Pursuant to the Highway Capacity Manual, the recommended average PCE value for converting heavy vehicles is 2.0.*

[12] *This traffic analysis identified an alternative mitigation measure for this intersection. This measure would reroute the inbound buses to Rodeo Road and make the southbound right-turn at that intersection with another right turn from westbound Rodeo Road to northbound Jefferson Boulevard. The revised inbound route provides right-turn capacity that can accommodate the bus maneuvers but may create noise impact to nearby residential units. Supervisor Yvonne B. Burke's motion of September 25, 2003, Agenda Item No. 26, calls for avoiding this routing during peak periods, and the hours of 9:00 P.M. to 7:00 A.M. to avoid noise impact. Therefore, this alternative routing is not currently proposed.*

200 directional daily trips. During excavation, conflicts between truck haul activities and street traffic, and pedestrian travel could occur due to site constraints related to the project's location, with nearby neighborhoods and certain roadway limitations. Therefore, the project's construction impacts on traffic due to excavation on traffic are considered a potentially significant short-term impact, prior to mitigation. A mitigation measure requiring a Work Area Traffic Control Plan is proposed to identify all traffic control measures, signs, delineators and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.

The net new operational traffic added to the local streets by the Sunset Avenue Project is 1,168 daily trips with 107 A.M. peak-hour trips and 174 P.M. peak-hour trips. Access to the proposed residential uses would be located via Sunset Avenue, approximately 100 feet west of Main Street. The residential access would provide egress to both Main Street and Pacific Avenue with ingress from Main Street only. The project's commercial and visitor access would be provided by an entrance/exit on Main Street. The proposed project would significantly impact two intersections located in the City of Los Angeles including the following: Main Street and Rose Avenue (P.M. only) and Main Street and Sunset Avenue (P.M. only). Because of public comments regarding potential traffic impacts on weekends, a traffic analysis was also performed for the Saturday peak hour. At this time the project would generate 1,417 net daily trips with 147 Saturday midday peak-hour trips. This is 29 fewer trips than would occur during the significantly impacted, weekday P.M. peak hour. Significant impacts would not occur at any intersections during the week end peak hour.

b. Cumulative Impacts

Cumulative effects of traffic have been incorporated into the above analysis for the Transportation Facility and Sunset Avenue Projects. Consequently, impacts of cumulative growth are already incorporated in the traffic models for each project.

Based on the 2002 Congestion Management Program, the nearest CMP monitoring location to the West Los Angeles Transportation Facility is La Cienega Boulevard and Jefferson Boulevard. In the absence of the Transportation Facility, future traffic conditions at the three study intersections are expected to worsen over existing conditions during both A.M. and P.M. peak hours. Although the project would contribute to a decline in service at each study intersection, the contribution would be less than significant, as it would not exceed the thresholds established by LADOT. Therefore, no specific off-site mitigation measures are required for the Transportation Facility site.

The intersection of Lincoln Boulevard and Venice Boulevard is the closest CMP location to the Sunset Avenue Project. The proposed project does not exceed these CMP traffic growth

limits at this location. Therefore, no additional CMP analysis is necessary. Future traffic conditions without the Sunset project would result in reduced service, compared to existing conditions, at the 13 study intersections during both A.M. and P.M. peak hours. The proposed project would contribute to significant impacts at three of the study intersections prior to mitigation. Mitigation measures for the Sunset Avenue Project have been recommended at each significantly impacted intersection.

c. Mitigation Measures

West Los Angeles Transportation Facility

1. Construction Mitigation

Mitigation Measure WLA-I.1: Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that at a minimum should include:

- Identification of a designated haul route to be used by construction trucks;
- Provide an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures, emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;
- Provide a schedule of construction activities;
- Limitations on any potential lane closures to off-peak travel periods;
- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordinating deliveries to reduce the potential of trucks waiting to unload building materials;
- Prohibiting parking by construction workers on neighborhood streets as determined in conjunction with City Staff.

2. Operational Mitigation

Mitigation Measure WLA-I.2: Provide intersection modifications, such as street widening and restriping at the intersection of Jefferson and La Cienega Boulevards to alleviate the tight right-turn. Widen Jefferson Boulevard along the south side west of La Cienega Boulevard and shift the traffic lanes southerly providing a wider westbound curb lane for buses to turn into. This mitigation measure is shown in Section IV.I, Transportation and Circulation. This street widening is within the proposed Exposition Light Rail Transit Project right-of-way and must be done in conjunction with any future Exposition transit project. The design of both projects shall be coordinated for compatibility. Further, the improvements at this intersection shall include restriping of the left-turn queuing lane on Jefferson Boulevard to northbound La Cienega boulevard to increase the storage capacity, pursuant to discussions with LADOT.

Sunset Avenue Project

1. Construction Mitigation

Mitigation Measure Sunset-I.1: Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that should include:

- Identification of a designated haul route to be used by construction trucks;
- Provision of an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures (including, but not limited to, the use of a flagman during ingress and egress of trucks and heavy equipment), emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;
- Provision of a schedule of construction activities;
- Limitations on potential lane closures to off-peak travel periods;
- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordination of deliveries to reduce the potential of trucks waiting to unload building materials (delivery trucks shall be brought onto and stored within the project site);
- Prohibition of parking by construction workers on neighborhood streets as determined in conjunction with City;

- Identification of off-site staging procedures for haul trucks during excavation;

  – Haul truck staging shall occur on a designated major arterial street, or off-street parking lot where the potential for residential parking and traffic impacts are less than significant. Off-site trucks shall then be called to the site for loading operations;

  – Staging on Main Street shall be avoided to the extent feasible. Any staging on Main Street shall be very limited and allowed only on special occasions and pre-approved by the City via a street use permit

- Provision of off-street parking capacity for construction workers with sufficient capacity for those who cannot park on-site during the demolition, grading, and parking structure construction phases, with shuttle services as necessary.

2. Operational Mitigation

Mitigation Measure Sunset-I.2: Right-Turn Restrictions – The proposed Main Street non-residential access shall be restricted to right-turns only (i.e., no left-turn ingress or egress will be permitted at this driveway.

Mitigation Measure Sunset-I.3: Main Street and Rose Avenue – Implement the improvement listed for Main Street and Rose Avenue pursuant to the Venice Community Plan Transportation Program by restriping the east- and westbound Rose Avenue approaches to Main Street to provide an exclusive left-turn lane and on optional thru/right-turn lane. Implementation of this improvement would require the removal of approximately four on-street parking spaces on Rose Avenue east of Main Street.

Mitigation Measure Sunset-I.4: Main Street and Sunset Avenue – Modify the southbound Main Street approach to Sunset Boulevard to provide an optional thru/left-turn lane, one through lane and a right-turn lane. Restripe the westbound Sunset Avenue approach to Main Street to provide an exclusive right-turn lane and one optional thru/left-turn lane. Construct and restripe the west leg of the intersection to include one exclusive right-turn lane and one through/left-turn lane. Implementation of this improvement would require the removal of approximately three on-street parking spaces on the west side of Main Street north of Sunset Avenue.

(The above required street improvements shall be guaranteed before the issuance of building permits through the B-permit process of the Bureau of Engineering.)

Mitigation Measure Sunset-I.5: Upgrade the existing pedestrian crossings located across Main Street at Sunset Avenue and across Pacific Avenue at Sunset Avenue with flashing markers/signage; i.e., "Smart Crosswalks

Mitigation Measure Sunset-I.6: Lincoln Boulevard and Rose Avenue – The proposed project shall provide a fair-share contribution to the planning and implementation of the rapid bus transit system on Lincoln Boulevard currently under study by the Lincoln Corridor Task Force (LCTF).

Mitigation Measure Sunset-I.7: Pursuant to Section 6 of the Coastal Transportation Corridor Specific Plan (CTCSP), the applicant, except as exempted, shall pay or guarantee payment of a Transportation Impact Assessment Fee (TIA) prior to issuance of any building permit, as applicable.

Mitigation Measure Sunset-I.8: The applicant shall consult with LADOT for driveway and internal circulation requirements.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. The traffic impacts associated with the construction activities are less than significant. (Mitigation measures were not required, however pursuant to Standard Construction Practices, mitigation measures that reduce the non-significant impacts were proposed.) In addition, the Transportation Facility would not significantly impact any of the three study intersections analyzed; therefore, no mitigation measures are required. Routing impacts would be less than significant with the proposed mitigation for Jefferson and La Cienega Boulevards.

Sunset Avenue Project. The proposed Work Area Traffic Control Plans that are recommended as project mitigation measures address specific adverse conditions that could arise due to conflicts between truck-haul activities and street traffic and pedestrian travel. These measures would reduce potential construction impacts to less-than-significant levels. Impacts from project traffic operations would be less than significant with the implementation of the proposed mitigation measures.

Combined Projects. The future cumulative analysis included related projects, either under construction or planned, located within each project's study area. The lists of related projects were developed pursuant to direction from the LADOT, Culver City and Santa Monica. The lists of related projects for the Transportation Facility and Sunset Avenue do not share any projects. Therefore, their study areas are distinct and their combined impacts would be less than significant.

10. Parking

a. Project Impacts

West Los Angeles Transportation Facility. Construction of the proposed project would result in a temporary demand for employee parking and equipment staging areas. When on-site staging and parking is not available, a secondary staging area is planned to occur in the parking lane on the east side of Jefferson Boulevard, adjacent to the site. The project applicant would be required to submit formal construction staging and traffic control plans. Short-term on-street parking impacts may occur in the immediate area during the busiest construction phases (e.g., foundation, building shell and finish construction phases). However, due to the size of the project site and the relatively limited area of the proposed structural improvements, considerable on-site parking capacity should be available during most of the construction period for construction workers. As a result, substantial off-site parking inconvenience would not occur and a less than significant parking impact would occur during construction.

Upon the completion of construction, the proposed project would provide surface parking stalls for up to 175 buses. The project would provide a parking deck with 240 spaces serving the employees working on-site in maintenance and administrative functions as well as bus driving staff. These parking provisions exceed the parking requirements set forth in the LAMC, and would more than accommodate the employees required to meet the project workloads. Therefore, the Transportation Facility's parking impact during operation would be less than significant.

Sunset Avenue Project. Residential parking is very limited in the project area as a result of historical development patterns in which the coastal area of Venice developed prior to extensive reliance on the automobile for personal mobility. Construction of the Sunset Avenue Project would be completed in approximately 24 months and would occur in three general phases, each phase generating its own combination of construction equipment. The surrounding neighborhood would experience different impacts based on the phase, its duration and equipment mix. Due to the increase in the number of employees during construction, on-street parking could be affected in the project area. As a result, the Sunset Avenue Project would cause a substantial temporary inconvenience to automobile parkers during construction and a significant parking impact could occur during construction. The traffic mitigation program would require the approval of a Work Area Control Plan to minimize potential conflicts between construction activities, residents, street traffic, and pedestrians. In addition, parking mitigation measures are proposed to address temporary parking impacts in the community.

Following construction, the entire project would rely on the newly provided parking capacity in the two-level subterranean parking facility. Commercially available parking for

beach visitors and business patrons would be located on-site within the subterranean parking facility. The project would provide 676 parking spaces. Of these, 561 spaces are intended to meet the needs of on-site uses in accord with City ordinances, 71 spaces are intended to meet parking needs pursuant to Beach Impact Zone regulations, and the remaining 44 spaces would be in excess of parking requirements and could be used to provide fee parking for surrounding residents. Based on a maximum of 225 dwelling units, the proposed commercial program, and the Beach Impact Zone requirements, 632 parking spaces would be required to comply with LAMC and the Venice Coastal Zone Specific Plan. The Specific Plan requirements are based on recent evaluations of parking needs in the area and reflect the expected demand that would be generated by the project's uses. The parking that is provided under Beach Impact Zone requirements would not be required to meet any demand generated by project activities, nor would the additional 44 excess spaces proposed to supplement parking in the area, and that could be used to provide fee parking for surrounding residential uses. Therefore, project parking would meet all parking regulations and would exceed the amount of parking needed to meet demand generated by project activities by 115 spaces. The provision of 115 parking spaces is equal to the parking demand generated by 46 residential units.[13] Therefore, the proposed project would not only meet the parking demand, it would provide increased parking opportunities in a parking-deficient neighborhood.

The provisions of site access would require the removal of approximately four on-street parking spaces on Rose Avenue east of Main Street and approximately three on-street parking spaces on the west side of Main Street north of Sunset Avenue, resulting in the loss of seven on-street spaces in the project locale. This is seven spaces less than the 14 diagonal spaces proposed for a widened Sunset Avenue adjacent to the site. Impacts on parking would be beneficial and less than significant.

Combined Projects. Parking impacts occur in a localized area, generally within 0.25 mile of a proposed project. The West Los Angeles Transportation Facility and the Sunset Avenue Project are approximately 6 miles apart, and, therefore, no combined impacts on local parking resources would be experienced in either project locale or in areas located between the respective project sites.

b. Cumulative Impacts

The only two related projects in the immediate vicinity of the Transportation Facility are an 11,000 sq.ft. live/work development on Eastham Drive and the Exposition LRT Project with its park and ride transit facilities proposed on La Cienega Boulevard. It is expected that all related projects would be required to provide parking capacity in compliance with the City of Los Angeles and Culver City requirements, respectively. The Exposition LRT may be used by

[13] *2.5 parking spaces/unit = 46 residential units.*

project employees, thus reducing the demand for parking on the project site. The EIS/EIR for the LRT Project has identified potential parking impacts along the LRT corridor and recommended mitigation measures that would reduce such impacts to less-than-significant levels. As the proposed project would meet all of its parking requirements on site, the project would not contribute to a cumulative significant impact on parking.

In regard to the Sunset Avenue Project, the two related projects in the immediate vicinity include the 51-unit Venice Art Lofts Project and a 35-unit condominium project, soon to start construction. Both related projects are located across Main Street. All related projects would be expected to provide parking capacity in compliance with City of Los Angeles requirements. Therefore, the cumulative impacts of related projects would be less than significant and would not dilute the beneficial parking effects of the proposed project.

c. Mitigation Measures

West Los Angeles Transportation Facility Project. The Transportation Facility would have no adverse impacts on existing local parking resources and no mitigation measures are required.

Sunset Avenue Project. The Sunset Avenue Project would have no adverse impacts on existing local parking resources during operation and no mitigation measures are required. However, a short-term adverse parking impact would occur during construction. As such, the following mitigation measures are proposed.

Mitigation Measure Sunset-J.1: Off-site parking areas, with adequate capacity to serve existing demand and construction worker demand, such as the public parking lot located one block north of the site shall be used for construction worker parking when on-site parking capacity is insufficient. Such off-site parking areas shall be located within walking distance of the project site or shuttle service shall be provided by the contractor between the off-site parking areas and the project site.

Mitigation Measure Sunset-J.2: With the implementation of Mitigation Measure Sunset-J.1, construction workers shall not be allowed to park on the residential neighborhood streets.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. There would be no adverse significant impacts, and therefore, mitigation measures are not required. LAMC requirements would be met with on-site parking facilities.

Sunset Avenue Project. With implementation of the mitigation measures, parking impacts during construction would be reduced to less-than-significant levels. There would be no adverse significant impacts during operation of the proposed project and, therefore, mitigation measures are not required. Specific Plan requirements for residential uses as well as beach impact zone parking would be met with on-site parking facilities located in the subterranean parking structure. In addition, the Sunset Avenue Project would provide 71 additional parking spaces in compliance with the Specific Plan's Beach Impact Zone requirements and 14 diagonal street parking spaces along the south side of Sunset Avenue. As a result, the proposed project would have a net beneficial impact on parking in a parking-deficient neighborhood.

11. Utilities

Water

a. Project Impacts

West Los Angeles Transportation Facility. The proposed project would generate a total domestic water demand of 6,624 gallons per day (gpd). Although the site is currently vacant with no water demand, the water demand estimate will be accommodated by the site's existing water infrastructure. Additionally, the on-site infrastructure will provide a fire service pressure of 600 gallons per minute (gpm) at 97 pounds per square inch (psi), which exceeds the proposed need of 475 gpm for on-site fire systems such as overhead sprinklers. The public fire flow demand of 2,500 gpm will also be accommodated by the existing water infrastructure's capacity. The proposed project's water consumption estimate would be 0.0011 percent of City of Los Angeles Department of Water and Power's current daily water distribution. The water demand estimate is consistent with local ordinances regarding water consumption and conservation and is under the thresholds to enact state legislation regarding water demand for specific developments. Implementation of the West Los Angeles Transportation Facility will have no adverse impact on the City's water supply and distribution systems.

Sunset Avenue Project. Water consumption for the Sunset Avenue Project would increase by 38,578 gpd for total domestic water demand over existing conditions. The existing on-site infrastructure will accommodate this increase in domestic water demand in addition to supplying adequate on-site fire service pressure of 600 gpm at 72 psi, which exceeds the proposed need of 475 gpm. Public fire flow can also be accommodated by existing infrastructure capacity. The proposed mixed-use development water consumption estimate will not require an upgrade or expansion of the City's water delivery system. Capacity data provided by the Department of Water and Power concludes that existing water mains will be sufficient to serve the proposed mixed residential and commercial development. The Sunset Avenue Project will not have adverse impacts on the City's water infrastructure and supply.

Combined Projects. The City of Los Angeles Department of Water and Power has determined both sites' infrastructure to be sufficient for future capacity and that water supply capacity is accommodated by regional growth forecasts. Therefore, the proposed projects would not contribute to a combined impact on the City's water distribution or water supply capacity.

b. Cumulative Impacts

There are 11 related projects in the vicinity to West Los Angeles Transportation Facility and those combined with the proposed demand from the project will generate a water consumption demand of 116,926 gpd. The 21 related projects to the Sunset Avenue Project combined with the proposed Sunset Avenue Project water demand would consume an estimated 2,141,790 gpd. When both the West Los Angeles Transportation Facility and the Sunset Avenue Project and their related projects are combined the estimated water demand generated will be approximately 2,258715 gpd. This total is .38 percent of the City's current daily water delivery. The Playa Vista project contributes approximately 65 percent of the cumulative total and the City determined water supply capacities would be adequate to serve that project. The City's water supplies are also sufficient for the remaining related projects, each of which will be evaluated on a project-by-project basis. No adverse cumulative water demand impacts would result directly due to the related projects identified in conjunction with the West Los Angeles Transportation Facility and the Sunset Avenue Project.

c. Mitigation Measures

West Los Angeles Transportation Facility. Since this project would not result in significant adverse impacts to the City's water supply or conveyance systems as confirmed by the service provider, mitigation measures are not required.

Sunset Avenue Project. This project also would not result in a significant adverse impact to the City's water supply or conveyance systems, as confirmed by the service provider. Therefore, mitigation measures are not required.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. No significant impacts to the City's water supply, infrastructure or related facilities would occur as a result of the West Los Angles Transportation Facility project

Sunset Avenue Project. No significant impacts to the City's water supply, infrastructure or related facilities would occur as a result of the Sunset Avenue Project.

Combined Projects. Neither the West Los Angeles Transportation Facility or the Sunset Avenue Project have individual impacts that require mitigation for demand on the City's water supply or distribution systems. As such, the proposed projects would not contribute to a combined impact.

Wastewater

a. Project Impacts

West Los Angeles Transportation Facility. The proposed project would generate 5,760 gallons per day (gpd) of wastewater. Although the site is currently vacant with no wastewater generated, the new generation estimate will be accommodated by the site's existing sewer infrastructure. The West Los Angeles Transportation Facility's total wastewater generation is 0.005 percent of the 119 mgd of available dry weather wastewater capacity at the Hyperion Treatment Plant (HTP). Additionally the West Los Angeles Transportation Facility's total wastewater generation will be only 0.012 percent of the 5.0 mgd annual increase in total wastewater treated at HTP in accordance with Ordinance No. 166,060. As such, wastewater generation by the West Los Angeles Transportation Facility is anticipated to be accommodated by the City's collection facilities and the Hyperion Treatment Plant. Therefore, no adverse projects impact on the City's wastewater infrastructure are expected

Sunset Avenue Project. Wastewater generated for the Sunset Avenue Project would increase by 33,546 gpd over existing conditions. Capacity data provided by the Department of Public Works concludes that the proposed mixed-use development's wastewater generation will not require an upgrade or expansion of the City's sewer infrastructure. The two existing 6-inch sewer lines will accommodate the increase in wastewater discharge by evenly distributing wastewater to both lines. The Sunset Avenue Project's total wastewater generation will be less than 0.03 percent of the unutilized treatment capacity at the HTP. Also, its contribution to the delineated annual increase in wastewater to be treated at the HTP is less than 0.7 percent of the allocated 5.0 mgd. Development of this mixed-use project is not expected to exceed existing sewage collection capacity servicing the site, nor treatment capacity at the Hyperion Treatment Plant. Therefore, no adverse project impacts on the City's wastewater infrastructure are expected.

Combined Projects. The City of Los Angeles Department of Public Works has determined that existing sewer infrastructure for both sites is sufficient for future capacity. Additionally, the HTP has adequate future capacity for both projects. Therefore, the proposed projects would not contribute to a combined impact on the capacity of the City's infrastructure or treatment facilities.

b. Cumulative Impacts

There are 11 related projects in the vicinity to the West Los Angeles Transportation Facility and those combined with the proposed demand from the project will cumulatively generate 101,797 gpd of wastewater. The 21 related projects for the Sunset Avenue Project including the proposed project would cumulatively generate 2,101,903 gpd of wastewater. Combined, the West Los Angeles Transportation Facility and the Sunset Avenue Project and their related projects would generate 2,203,700 gpd of wastewater. Over 67 percent of this total estimate will be associated with a single large, multi-phase, multi-year project, the Playa Vista project. This cumulative total represents approximately 1.9 percent of the unutilized dry weather capacity at HTP, indicating that the City's wastewater treatment capacity is more than adequate to accommodate the cumulative demand associated with the West Los Angeles Transportation Facility and Sunset Avenue Project. No adverse cumulative wastewater generation impacts would result directly due to the related projects identified in conjunction with the West Los Angeles Transportation Facility and the Sunset Avenue Project.

c. Mitigation Measures

West Los Angeles Transportation Facility. Since the West Los Angeles Transportation Facility would not result in any significant environmental impacts upon the City's wastewater collection and treatment infrastructure, mitigation measures are not required.

Sunset Avenue Project. The increased wastewater generation attributable to the Sunset Avenue Project will not create an impact on existing wastewater collection and treatment infrastructure maintained by the City of Los Angeles. Therefore, no mitigation measures for the Sunset Avenue project are required.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. No significant impacts to the City's wastewater collection and treatment infrastructure would occur as a result of the West Los Angles Transportation Facility project.

Sunset Avenue Project. No significant impacts to the City's wastewater collection and treatment infrastructure would occur as a result of the Sunset Avenue Project.

Combined Projects. Neither the West Los Angeles Transportation Facility or the Sunset Avenue Project have individual impacts on the City's wastewater collection and treatment infrastructure. Additionally, the City of Los Angeles Department of Public Works has adequate future wastewater generation capacity, therefore, the proposed projects would not contribute to a combined impact.

II. Project Description

II. PROJECT DESCRIPTION

This Draft EIR has been prepared to address the environmental impacts of both the West Los Angeles Transportation Facility and the Sunset Avenue projects. This decision between Metro and the City of Los Angeles has been made because proposed development of each site is related to the other site. Specifically, while approval decisions regarding the two projects are not necessarily tied together, both projects are related to a relocation of the existing Division 6 transportation facility currently located at the Sunset Avenue site. Upon completion of the West Los Angeles Transportation Facility, a new, larger, state-of-the-art facility for CNG buses proposed along Jefferson Boulevard, Metro has committed to relocate all service lines, employees, and administrative functions performed out of the antiquated Division 6 property in Venice. Completion of the West Los Angeles Transportation Facility and removal of the existing Division 6 facilities would then result in the reasonably foreseeable development of the Sunset Avenue property. Thus, this Draft EIR analyzes both the potential individual and combined impacts of the West Los Angles Transportation Facility and the Sunset Avenue projects.

A. LOCATION AND BOUNDARIES

West Los Angeles Transportation Facility. The project site is located at 3475 South La Cienega Boulevard within an industrial area of the West Adams-Baldwin Hills-Leimert Community of the City of Los Angeles. Although the address reflects a previous access from La Cienega Boulevard, the project site is adjacent to and has primary access from Jefferson Boulevard along the site's western boundary. Jefferson Boulevard is accessible from Rodeo Road to the south and National Boulevard to the north. Please refer to Figure II-1 on page 61 for a site Vicinity Map. As described in more detail below, the project site is presently vacant and was previously used for light industrial purposes from which a few deteriorated structures remain.

The 4.66-acre property is located approximately 120 feet east of the Ballona Creek Flood Control Channel that flows through this area. Within the project area, Ballona Creek is also the general boundary between the City of Culver City on the west side of the channel and the City of Los Angeles on the east side of the channel. The project site is also surrounded by light industrial and commercial land uses to the north, south, and east. Light industrial uses are also present on the west side of Ballona Creek in the City of Culver City. The topography of the

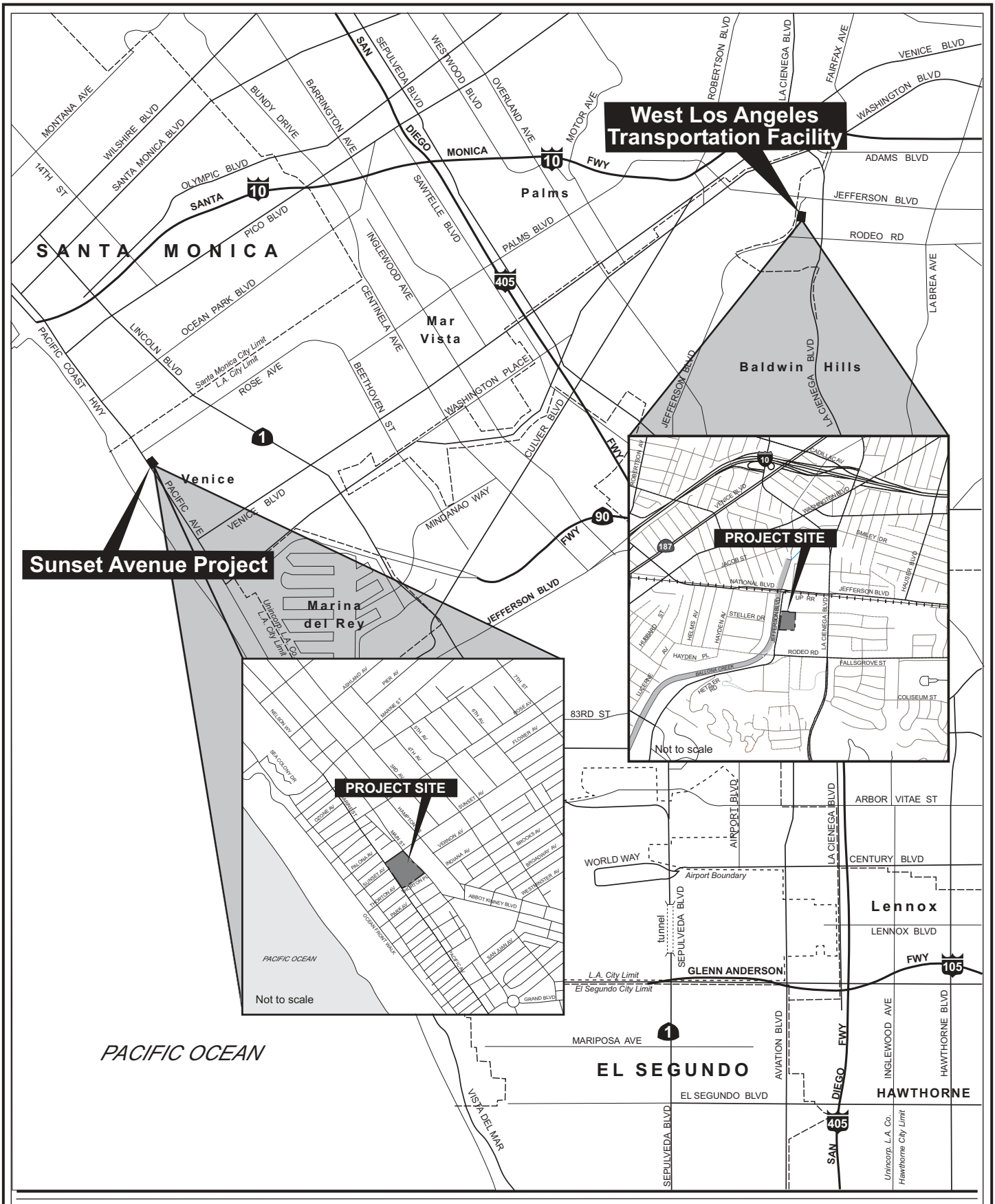

Figure II-1
Project Vicinity and Location Map

Source: PCR Services Corporation, 2004

project area is relatively level with the Baldwin Hills rising to 511 feet above sea level approximately 0.5 mile to the south.[14] Residential uses are located around the periphery of this industrial area, with the closest residences situated 800 feet south in the Cameo Woods development in the City of Los Angeles. Other nearby residential uses in the City of Culver City include the Blair Hills, McManus/East Culver City, and the Lucerne/Higuera/Rancho Higuera/Hayden Tract Neighborhoods, located approximately 2,500 feet southwest, 1,050 feet northwest, and 1,500 feet west of the site, respectively. Similarly, within the City of Los Angeles, the West Adams Neighborhood is located approximately 1,000 to 1,200 feet east and northeast of the site, while the Baldwin Hills Neighborhood is located approximately 1,800 feet to the southeast of the site.

Sunset Avenue Project. Located at 100 East Sunset Avenue, the project site is in a predominately residential neighborhood within the Venice Community of the City of Los Angeles. Please see Figure II-1 on page 61. Located near the western edge of the City of Los Angeles, the site is situated 0.25 mile east of the Pacific Ocean and approximately 0.3 mile south of the boundary between the cities of Los Angeles and Santa Monica. The project site is bordered by Pacific Avenue to the west, Main Street to the east, Sunset Avenue to the north, and Thornton Place to the south. The 3.13-acre site comprises one full city block. Access to the site is gained from the northeast corner of Main Street and Sunset Avenue, where Main Street can be accessed from three primary arterials, Rose Avenue and Ocean Park Boulevard in the City of Santa Monica and Venice Boulevard in the City of Los Angeles.

Small-lot single-family and multi-family residential uses are located to the north, south, and west of the project site. To the east, across Main Street, is a commercial parking lot, a new multi-family development currently under construction, and a paved site recently entitled for multi-family development. The project site is variously 20 to 30 feet above sea level with predominantly level topography within the site and in the project area.[15]

B. BACKGROUND AND EXISTING CONDITIONS

West Los Angeles Transportation Facility. The project site was formerly a portion of the Ballona Creek primary flood plain prior to its re-alignment and channelization by the United States Army Corps of Engineers and the Los Angeles County Flood Control District in 1940.[16] In 1952, the project site was developed with three structures, totaling 9,000 square feet, for use

[14] *United States Geologic Survey – Hollywood Quadrangle, 1966 (photorevised 1981).*

[15] *United States Geologic Survey – Venice Quadrangle, 1964 (photorevised 1981).*

[16] *United States Army Corps of Engineers, www.usacoe.mil, 2004.*

by Carnation Creamery.[17] Ownership of the property transferred to the Sparkletts Drinking Water Company (now McKesson Water Products) in 1972. McKesson used the site as a distribution center for its water, food, and coffee products until 2001.[18] From approximately October of 2001 to present, the project site has remained vacant. Presently, three vacant and deteriorated structures are located on the site. The first structure, located in the northeast corner of the site, is a small one-story building that was a former office and administrative building. The second structure, located on the southern limit of the site, has five bay doors and a hydraulic lift, which was used as maintenance bays for distribution vehicles. The third structure is located near the center of the site and was previously an ice house and storage building. Additionally, a portion of the Los Angeles North Outfall Sewer runs underneath the project site, entering from the northern project limit and extending through the southern limit, at a depth of 43 to 46 feet below ground surface.[19]

The existing 4.66-acre site is located within the West Adams-Baldwin Hills-Leimert Community Plan area of the City of Los Angeles. The site is zoned Restricted Industrial (MR1) by the Los Angeles Municipal Code (LAMC) and the Community Plan Generalized Land Use map designates the site for limited manufacturing use.

Sunset Avenue Project. The Sunset Avenue project site has been improved and occupied as a transportation facility since 1901. Originally owned by the Los Angeles Pacific Electric (LAP), the site was the location of a powerhouse constructed on the corner of what is now Main Street and Sunset Avenue in the spring of 1901. Electricity produced by the powerhouse was provided for the movement of the Trolleyway that LAP ran along Pacific Avenue. The site also included a car house and a series of connected tracks on which to turn the trailer trains. LAP operated the site, then known as the Ocean Park Carhouse, as a railyard until 1950. On September 17, 1950, rail service was discontinued at the site and the carhouse was demolished as part of the site's conversion to a motor coach operation. Completed in 1951, the new Ocean Park motor coach facility was opened for service with 120 coaches, 180 bus operators, and 70 employees. LAP sold the passenger service to Metropolitan Coach Lines (MCL) in 1953 and demolished the original 1901 powerhouse in 1954. After four years of operation, MCL sold the site and the passenger line to the Metropolitan Transportation Authority (Metro) in 1958 and the site was renamed Division 6-Venice. Presently, 78 diesel buses and approximately 144 employees operate out of the Division 6 bus yard.[20] An L-shaped structure, the largest on-site, contains two-story administrative offices and seven maintenance bays. A

[17] *Phase II Site Assessment Report prepared by Environmental Support Technologies, Inc., 2003.*

[18] *Phase I Environmental Site Assessment Addendum prepared by Environmental Support Technologies, Inc., 2003.*

[19] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study for 3475 La Cienega Boulevard, 2003.*

[20] *Personal telephone conversation with Bruce Buck, Division 6 Manager, March 10, 2004.*

fueling station, pump room, and bus washer are also on-site along with 54 bus stalls and 65 employee parking spaces. Existing buildings on-site total approximately 15,300 square feet of floor area. Division 6 operates five days a week, Monday through Friday, from 4:45 A.M. to 11:00 P.M., and is closed during the weekend.

The 3.13-acre site is located in the Venice Community Plan area of the City of Los Angeles. Development of the site is also directed by the Venice Coastal Zone Specific Plan. The site is zoned Limited Industrial (M1) under the LAMC and the land use is designated by the General Plan for limited manufacturing use. The Specific Plan land use map illustrates the site with a Commercial Manufacturing (CM) zoning designation which indicates the City's intent to ultimately rezone the site's designation from M1 to CM.

C. STATEMENT OF PROJECT OBJECTIVES

Section 15124(b) of the State of California Environmental Quality Act (CEQA) Guidelines states that the Project Description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." Consistent with the Guidelines, this section of the Draft Environmental Impact Report (Draft EIR) provides the list of objectives that the Applicant seeks to achieve.

The underlying purpose of the proposed projects is to provide two projects that would allow each of the project sites to be put to improved uses in a coordinated manner that would facilitate the success of both projects. Towards this end, the Transportation Facility site would be developed with transportation facilities that would improve public transit service to the region. The relocation and improvement of these transit facilities creates an opportunity for the Sunset Avenue site to be developed with mixed residential and commercial development. Specific objectives have been developed for each of the sites. These objectives fall under the following primary categories: (1) Transit Objectives for the Transit Facility site, or Development Objectives for the Sunset Avenue site; (2) Design Objectives; and (3) Economic Objectives.

West Los Angeles Transportation Facility

Transit Objectives

- Expand service from a more centralized location in response to growing Westside and Central ridership, in order to respond more efficiently to service requests in the service area regarding routing, scheduling, refueling, etc.

- Improve transit service in all Central and Westside communities by increasing operating capacity system-wide through the addition of maintenance and operation capacity for up to 175 buses at an operating base within the service area, and by relieving overcrowding at other Metro divisions serving the Central and Westside areas. Reduce pressure at other already overburdened facilities and reduce the inefficient operation of Central and Westside routes from other sectors.

- Provide a new state-of-the-art facility that optimizes Metro's delivery of bus transit services throughout the Central and Western Los Angeles area.

- Support Metro's conversion to a 100 percent CNG fleet (new clean-fuel buses replacing older diesel buses) by approximately 2013. Provide facilities where utility infrastructure exists to support a CNG fueling station.

- Provide a modern maintenance and operation facility with state-of-the-art equipment that efficiently delivers maintenance, fueling, cleaning and operation on a 24-hour/seven-day-a-week basis to support Metro's bus cleanliness and maintenance program and ensure Metro delivers clean and reliable transit service throughout the Central and Western Los Angeles areas.

Design Objectives

- Accommodate and support the Transit Objectives, with sufficient facilities to accommodate expected demand, inclusive of bus and employee parking, maintenance bays, tire shop, CNG fueling, coach/chassis wash bay, fare retrieval vault houses, and other ancillary uses.

- Optimize utilization of the project site, subject to recognized site constraints.

- Enhance the general character of the project locale through conversion of a vacant, abandoned site into an efficient, well-designed bus operations and maintenance facility, consistent with current standards for "light-industrial" design.

- Provide landscape along the Jefferson edge and in other locations on the site, as appropriate, in order to visually enhance the Jefferson streetscape.

Economic Objectives

- Reduce the cost of bus transportation service delivery with state-of-the-art facilities that reduce operating costs.

- Promote cost savings by improving the efficiency of transportation service delivery with a facility located in the geographic center of its service area, placing buses closer to their routes, thereby reducing operating costs, non-revenue miles, and bus maintenance down time.

Sunset Avenue Project

Development Objectives

- Generate the land use and economic justification for the relocation of the existing Division 6 bus operations and maintenance facility and the reuse of the Sunset Avenue site in accordance with the City's General Plan Circulation Element and the community objectives as expressed in the Venice Community Plan and Venice Local Coastal Program Land Use Plan.

- Develop a market-rate and affordable housing mixed residential and commercial project per site priorities listed in Policy I.C.7 of the Venice Local Coastal Program Land Use Plan to address the need for high quality market-rate and affordable housing in the Venice Community.

- Develop a commercial presence, and pedestrian façade, on Main Street in order to continue the revitalization of Main Street as an active retail corridor in accordance with the City's Framework Element designation of a Community Center in the vicinity of Abbot Kinney Boulevard.

- Transform the historically outdated use of this property to maximize the provision of market-rate housing and provide Mello Act sponsored affordable housing in response to projected population growth rates and demand for such housing as identified in the Venice Community Plan.

- Support an existing, revitalizing residential neighborhood through the replacement of an obsolete, incongruously located transportation infrastructure facility with stabilizing residential and complimentary neighborhood serving commercial uses.

- Maximize parking opportunities in compliance with Beach Impact Zone parking policies, and offer fee parking to surrounding residents to the extent that is permitted by the existing City plans, codes, and zoning requirements.

Design Objectives

- Provide a design that creates a comfortable, aesthetic environment for living; that brings needed services to the neighborhood; and that adds to the overall character of the community through architecture and landscape design.

- Provide a design that serves the eclectic, sophisticated and functional preferences of the Venice Community's residential and commercial marketplace.

- Design interiors and exteriors that promote quality individual and family living spaces and effectively connect with the surrounding urban and coastal environments.

- Design commercial venues that successfully reflect neighborhood and market values.

- Design landscape features that provide a green and textured urban environment, that assist in defining the private space of individual residents and that add to the overall aesthetics of the project.

Economic Objectives

- Maximize the value of the property through the replacement of an obsolete transportation infrastructure facility with a level of housing and community serving commercial development that is appropriate for the local market. Create value through quality design and amenities offered to project residents, commercial tenants and patrons.

- Invest in the future of the Venice community by developing needed housing and community commercial uses on an underutilized parcel.

- Provide opportunity for people of varying socio-economic backgrounds to own quality housing in a dynamic, vibrant mixed-use community.

D. PROJECT CHARACTERISTICS

West Los Angeles Transportation Facility. The proposed project consists of a state of the art transportation facility from which to operate a fleet of up to 175 CNG powered buses and to provide improved public transit service in the central and western areas of Los Angeles County including large portions of the City of Los Angeles (including the communities of West Adams, Mid-City and South L.A., etc.) and the incorporated cities of Beverly Hills, Culver City, Malibu, Santa Monica and West Hollywood. Relocation of existing operations at Division 6 in

Venice to this location would allow Metro to expand service from a more centralized location in response to growing ridership. Development of the transportation facility on the 4.66-acre site would provide Metro with expanded maintenance and administrative facilities, CNG fueling facilities, and bus and employee parking. Figure II-2 and Figure II-3 on pages 69 and 70, respectively, present a plan view and a conceptual rendering of the proposed facility.

The project would be served by an Administration/Maintenance Building with administration and maintenance functions. This building would be located along the rear/eastern edge of the project site. It would include a combination of single story, high-bay space (approximately 24 feet in height), partial two story areas within the same 24 foot envelope, and a partial three story element that would be approximately 40 feet high. All of the bus parking would be provided at grade and all of the employee/visitor parking would be located on a second floor deck approximately 20 feet above grade. The central portion of the site would be dedicated to surface parking for up to 175 buses. A majority of the bus parking area would be covered by the above-grade employee/visitor parking area that would provide parking for up to 240 vehicles. The Administration Building would be tied to a continuous solid wall with a minimum height of eight feet that would enclose the project site. The project edge along Jefferson Boulevard would have a decorative wall behind a landscaped buffer between the wall and Jefferson Boulevard.

The total area of the Administration/Maintenance Building would be approximately 53,120 square feet. The primary first floor functions include up to 14 High-Bays (for bus maintenance, repair and inspection), parts storage, tire shop, welding shop, and limited offices. The second floor would include maintenance support functions such as a training room, locker rooms, break room, supporting offices and storage. The third floor would include administrative offices, and bus-driver support functions such as dispatch, lockers, break room, supporting offices and storage.

In addition, the project site would include several auxiliary facilities. These facilities include a bus washing and fueling area (approximately 10,400 square feet), inspection bay (approximately 4,900 square feet), chassis wash area (approximately 1,700 square feet), facilities maintenance area (approximately 700 square feet) and trash/recycling area (approximately 1,100 square feet).

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Scale not provided

Figure II-2
West Los Angeles Transportation Facility
Site Plan

Source: RNL Design, 2004

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Figure II-3
West Los Angeles Transportation Facility
Conceptual Rendering

Source: RNL Design, 2004

Design decisions and project features (e.g., use of recycled building materials, water efficient landscaping) to be incorporated into the Transportation Facility would enable the facility to pursue a certification under the Leadership in Energy and Environmental Design (LEED) Green Building Rating System, which is under the direction of the United States Green Building Council. LEED certification distinguishes building projects that have demonstrated a commitment to sustainability by meeting the highest performance standards.[21] Further, LEED certification would comply with a motion set forth by the Mayor of the City of Los Angeles, and Metro Board Director, James K. Hahn, on December 4, 2003.[22] (Refer to Appendix H-2 of this document for a copy of the full motion.)

Operation of the facility would be 24 hours a day, seven days a week. On-site activity would be higher between 4:00 A.M. and 6:00 A.M. when the greatest number of bus operators can be expected to arrive at the facility to begin their shifts and pull buses out of the facility to go into service well before rush hour. Activity would peak again between 7:30 P.M. and 9:00 P.M., after rush hour, when buses return to the facility to be cleaned, fueled, and readied for service the next day. Activity would be least during morning and evening rush hour times when the vast majority of buses are away from the facility providing transit service throughout the westside and central section of Los Angeles. Employees would work in shifts out of this facility with approximately 414 total employees assigned to the site. These include bus operators, mechanics, service attendants, supervisors, and management personnel.

Ingress and egress to the site would be from Jefferson Boulevard. Employees and visitors would access the grade-separated parking structure via this main driveway that would lead to a ramp up to the parking deck to be located in the northeastern part of the site. Buses would ingress and egress from the same driveway through an automated security gate. Although employees may utilize varied routes to and from the facility, buses would follow a set circulation pattern to begin and end their respective transit routes.

Construction of the new West Los Angeles Transportation Facility is anticipated to begin in March of 2005 and to be completed by June 2006.

Sunset Avenue Project. The proposed project would replace the vacated Division 6 operation with a mix of residential and commercial uses supported by two levels of subterranean parking. Residential uses would occupy several individual structures that would each contain a varying number of dwelling units. The project proposes to include an affordable housing component, pursuant to the Mello Act (Government Code Section 65590). The Mello Act

[21] *U.S. Green Building Council, https://www.usgbc.org/LEED/Project/Certprocess.asp.*

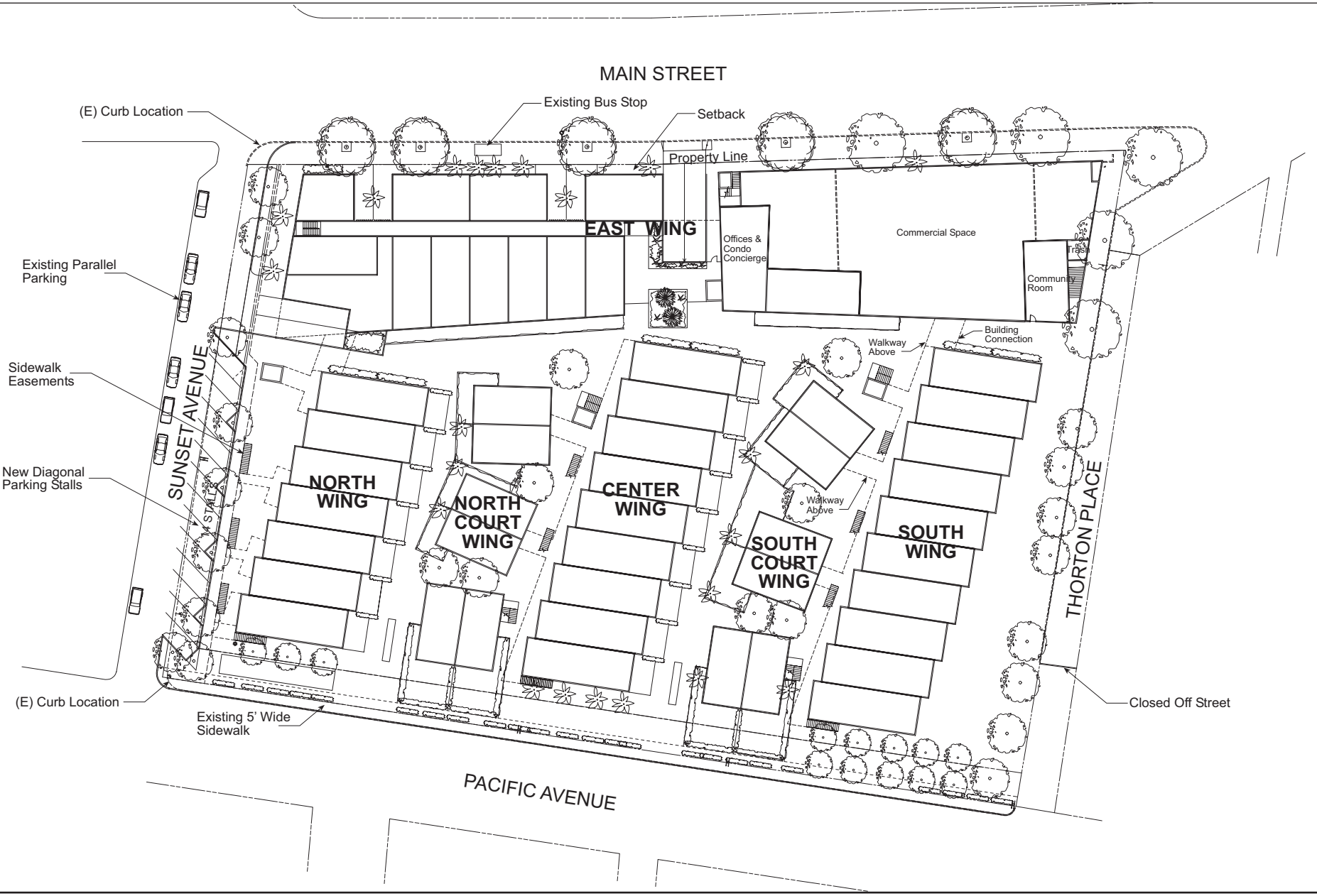
[22] *Metro Board of Directors Regular Board Meeting, December 4, 2003.*

entitles the project to a density bonus of 25 percent over the number of dwelling units permitted in the site's zone, in this case 171 units of base density, for inclusion of an affordable component equal to between 10 and 20 percent of the base density, depending on the affordable household income level. Further, should the project pursue a second provision established by the City of Los Angeles (Los Angeles Municipal Code Section 12.22) that entitles an additional density bonus of 10 percent of the base density for development within the Coastal Zone and adjoining a designated transportation corridor, then an additional number of units could be developed. Thus, with both density bonus provisions, a total of 231 units could be developed on this site. However, the total number of residential units to be developed would be determined by final design, but in no case would the number exceed 225 dwelling units.

Open areas between the individual structures would allow for communal walkways, common space for recreation or garden areas, water features, and landscaping. A conceptual site plan and conceptual site renderings are presented as Figure II-4 through Figure II-8 on pages 73 through 77. In addition to open spaces and communal areas, a rooftop pool and deck would be provided for recreational purposes. A maximum of 225 units would be offered, with a total residential floor area of approximately 270,000 square feet. Residential structures that face Main Street and Pacific Avenue are proposed with building heights that would not exceed 35 feet, while structures in the center of the site and those facing Sunset Avenue and Thornton Place are proposed to be approximately 45 to 56 feet in height.

Commercial uses include approximately 10,000 square feet of floor area in a ground floor setting facing Main Street. Commercial and retail space would be occupied by café, retail, and health club uses. Open spaces between structures along Main Street and a portion of Thornton Place would be utilized for outdoor café seating. Parking for business patrons would also be located within the subterranean parking facility. Commercial/retail uses would operate between 10:00 A.M. to 7:00 P.M., whereas the health club would operate between 10:00 A.M. to 10:00 P.M. The café would open at 7:00 A.M., closing at 10:00 P.M. Residential access to the site would be gained from Sunset Avenue, while business patrons and delivery vehicles would ingress and egress via Main Street.

The entire project would be constructed over a two-level subterranean parking facility with capacity to exceed Los Angeles Municipal Code and Venice Coastal Zone Specific Plan parking requirements. The project would provide 676 parking spaces. Of these 561 spaces would meet project needs per City requirements for 225 dwelling units and the proposed commercial program; 71 spaces would be provided pursuant to Beach Impact Zone regulations and the remaining 44 spaces would be in excess of parking requirements, and could be used to provide fee parking for surrounding residents.



PCR

0 40 80 Feet

Scale in approximate feet

Source: KoningEizenberg Architecture, 2004

Figure II-4
Sunset Avenue Project
Site Plan

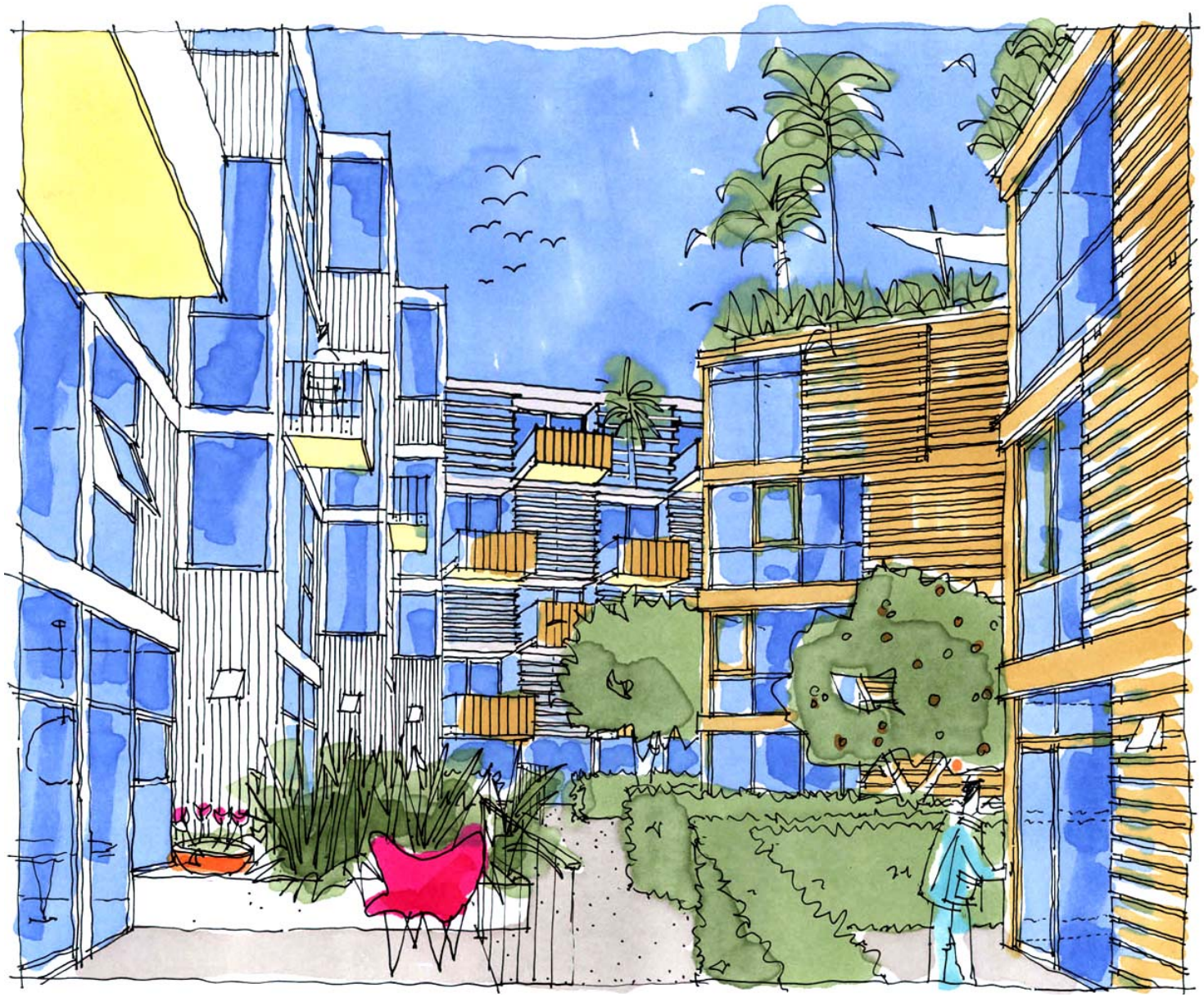


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Figure II-5
Sunset Avenue Project
Conceptual Site Rendering

Source: KoningEizenberg Architecture

Source: KoningEizenberg Architecture

Figure II-6
Sunset Avenue Project
Conceptual View Down
Sunset Avenue toward Pacific Avenue

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Source: KoningEizenberg Architecture

Figure II-7
Sunset Avenue Project
Conceptual View Looking Down
Main Street toward Sunset Avenue

PCR

Source: KoningEizenberg Architecture

Figure II-8
Sunset Avenue Project
Conceptual View Down
Pacific Avenue toward Thorton Place

Excavation for the subterranean parking facility would require the removal of an estimated 125,000 cubic yards of fill. Construction is anticipated to begin in June 2006 and to be completed in June of 2008.

E. INTENDED USE OF THE EIR

This EIR is a Project EIR, as defined by Section 15161 of the California Environmental Quality Act (CEQA) Guidelines and serves as an informational document providing analyses of the proposed West Los Angeles Transportation Facility and the Sunset Avenue projects. Its purpose is to assist the Metropolitan Transportation Authority and the Los Angeles Department of City Planning in making informed decisions regarding the environmental consequences of each of the discretionary actions that these agencies must make regarding the proposed West Los Angeles Transportation Facility and Sunset Avenue projects, respectively.

The West Los Angeles Transportation Facility would require permits or approvals for the following discretionary actions; the action's approving authority is provided in parenthesis:

- Approval of the sale of the Transportation Facility to Metro (Metro Board);
- Approval of facility design (Metro) (City of Los Angeles);
- Additional discretionary actions as may be determined necessary.

Additionally, the Sunset Avenue project requests approval for the following discretionary actions:

- Approval of a Tentative Tract Map (City of Los Angeles Department of Planning);
- Zone change from Limited Industrial to Commercial Manufacturing (City of Los Angeles Department of Planning);
- Specific Plan Exception for height and Floor Area Ratio (FAR) (City of Los Angeles Department of Planning);
- Approval of a Coastal Development Permit (City of Los Angeles Department of Planning);
- Approval of a Specific Plan Project Permit (City of Los Angeles Department of Planning);

- Adjustment for yard area (City of Los Angeles Department of Planning);
- Haul route(s) approval, as necessary (City of Los Angeles Department of Building and Safety); and
- Additional discretionary actions as may be determined necessary.

III. General Description of Environmental Setting

AESTHETICS

West Los Angeles Transportation Facility. The West Los Angeles Transportation Facility site is a vacant parcel with neglected buildings surrounded by a chain link fence. There is no ornamental landscaping and the site's asphalt pavement is cracked and overgrown with weeds and other volunteer vegetation. It is located in an area of West Los Angeles, the visual character of which is established with long city blocks of industrial buildings adjacent to small and large retail developments with store frontages behind surface parking lots. These uses are surrounded by residential neighborhoods to the east and south in the City of Los Angles and to the northwest, west, and south in Culver City and the Baldwin Hills to the South. The industrial uses are delineated by large, one- to two-story buildings with open parking lots. The small commercial centers are single-level buildings along arterial corridors and the large commercial areas follow the industrial building design of one- to two-story buildings with open parking lots with varying exterior façades. One of the prominent features of this community is the Ballona Channel, the largest such flood control facility in West Los Angeles. Entirely comprised of concrete, it nonetheless creates a wide expanse of visual open space adjacent to the site. Another prominent feature in this area is the hillsides of the Baldwin Hills, the closest portion of which is less than 1 mile to the south of the site. The Kenneth Hahn State Recreation Area is a combination of public open space developed with recreational uses. Privately owned residences and portions of open space in long-term oil production occupy some 600 acres along the upper parts of these hills. Commercial and industrial uses adjacent and across the channel can view the site with little obstruction. From the south and southeast of the site, homes on the north-facing hillsides have a low viewing angle of the site. Currently there is no daytime glare or nighttime lighting associated with the site due to its vacant, unimproved character.

Sunset Avenue Project. The Sunset Avenue Project site encompasses an entire city block with opaque fencing, solid walls, and, in places, screening vegetation enclosing the site. On-site are several buildings with the majority of the property paved for use as a diesel bus maintenance yard and parking lot for employees. It is located in the older part of the Venice Community, one and a half blocks from Venice Beach and Santa Monica Bay. This area is visually complex due to the compact built environment organized along narrow streets, alleys and walk streets. The dense, small lot residential land use pattern and associated improvements create a composite of different design styles, which in large part derive from earlier eras. In the immediate locale, this pattern is broken by newer commercial and residential developments, particularly across Main Street. Visually accessible open space is rare and observable vegetation

limited to what reaches above fenced yards and occasional street trees. Despite gently varied terrain due to underlying sand dunes, the appearance of topography is more attributable to highly built form in the surrounding locale. Although views into the site from the surrounding community are largely obstructed by perimeter screening, much of the site is illuminated until 11:00 P.M. on weeknights in support of ongoing maintenance operations.

AIR QUALITY

West Los Angeles Transportation Facility & Sunset Avenue Project. The West Los Angeles Transportation Facility and the Sunset Avenue Project sites are both located within the South Coast Air Basin (Basin). The Basin is an area of high air pollution potential due to atmospheric conditions, which create an area above the Basin where pollution dispersal is minimal. This condition is typically attributed to light winds and shallow vertical atmospheric mixing. These atmospheric characteristics reduce pollutant dispersion, thus causing the elevated air pollution levels in the Basin. Pollutant concentrations in the Basin vary from location, time of day and year. Ozone concentrations, for example tend to be lower along the coast, higher in the near inland valleys and lower in the far inland areas of the Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in southern California. Previously in non-attainment for all National Ambient Air Quality Standards (NAAQS) except sulfur dioxide (SO_2), the Basin is now defined as in attainment for nitrogen dioxide (NO_2), lead (Pb), and SO_2. There are various levels of severity of non-attainment designations with carbon monoxide (CO) currently designated as a "non-attainment" pollutant, and particulate matter (PM_{10}) designated as "serious non-attainment" and ozone (O_3), while reduced substantially from peak levels, is classified as "extreme non-attainment." Although progress has been made, this year has resulted in the worst smog season in seven years.

CULTURAL RESOURCES

West Los Angeles Transportation Facility. The West Los Angeles Transportation Facility site is located in an area developed with light industrial uses since channelization of the Ballona Creek for flood control in the mid-twentieth century. Prior to channelization, the area along the Creek would be prone to flooding and uses compatible with associated floodplain would have been restricted to such low-intensity activity as agriculture. State historical listings within a 0.5-mile radius of the site do not include buildings or sites within this area. However, one property listed on the Historic Cultural Monument listing for the City of Los Angeles lies within 0.5 mile of the site. A radius of 0.5 mile around the project site has previously been

identified as having four archaeological sites.[23] However, none of the sites are located within the West Los Angeles Transportation Facility site. In addition, paleontological findings have not been documented on-site. However, several paleontological vertebrate findings have been documented in the area at shallow depths.[24]

Sunset Avenue Project. The Sunset Avenue Project site has been in use as a transportation facility since 1901. Venice was established by Abbot Kinney as a tourist destination and real estate promotion in an era when public transportation was the primary mode of travel to the area. Originally the Sunset Avenue Project site was the Los Angeles Pacific Company's facility, which was replaced in 1904 by Pacific Electric Railway Company's Ocean Park Car House. The Ocean Park Car House was razed to accommodate the next era of public transportation, the bus operation.[25] The Sunset Avenue site is not included as a historic resource on federal, State, or local agency listings due to the lack of buildings or artifacts of historical significance since improvements have been added and removed many times to meet the technological changes associated with ongoing transportation systems. The area within 0.5 mile of the site does, however, include numerous resource listings. These include 15 properties on the California Historic Resource Inventory and the Parkhurst Building, which is noted on the National Register of Historic Places and the California Register of Historic Places listings. Additionally, the City of Los Angeles has included the Venice Arcades, Columns and Capitals on their listing of Cultural Monuments. Archaeological resources in the area include one site located within one half-mile radius of the Sunset Avenue Project site.[26] Area surrounding the site is mostly dense urban development with such uses creating massive ground disturbance, this reduces the chance of paleontological resource discoveries. On-site there are no such resources recorded; however, at a shallow depth within one mile from the site, a paleontological site has been identified.

GEOLOGY/SEISMIC HAZARDS

West Los Angeles Transportation Facility. This site is situated near the base of the Baldwin Hills and adjacent to the Ballona Channel Flood Control Improvements. Except for the Baldwin Hills, which rise several hundred feet above the urban plain, local topography is

[23] *California Historical Resources Information System, California State University, Fullerton Department of Anthropology March 10, 2004.*

[24] *Natural History Museum of Los Angeles County, Vertebrate Paleontology Section, March 5, 2004.*

[25] *Los Angeles County Metropolitan Transportation Authority, "MTA Divisions History: Division 6," February 4, 2004.*

[26] *California Historical Resources Information System, California State University, Fullerton, Department of Anthropology, March 8, 2004.*

generally level. Soils underlying the project locale are alluvial, reflecting proximity to the channel. The Los Angeles region, including the project area, is considered seismically active with numerous faults capable of seismic ground shaking that could affect this site. The site is located within an Alquist-Priolo Earthquake Fault Zone associated with the delineated rupture zone of the Inglewood-Newport fault. This locale is also within a liquefaction hazard zone due to the combination of loose alluvial soils and relatively shallow groundwater.[27]

Sunset Avenue Project. This site is located on sand dunes inland of Santa Monica Bay. Local topography is mostly level with an elevation range of 30 feet throughout the area. Local soils are comprised of ancestral alluvial deposits,[28] as well as fill material from development. Regional seismicity also affects the Venice area, as local ground shaking could originate with numerous regional faults and fault systems. No active faults are proximate to the site, however. The site is susceptible to liquefaction due to its loose soil type and relatively shallow groundwater.

HAZARDOUS MATERIALS

West Los Angeles Transportation Facility. Due to long-standing industrial uses of the area near the West Los Angeles Transportation Facility site, the potential for soil and groundwater contamination is relatively high. Both soil and groundwater contamination has been documented from on-site, as well as off-site, sources in an environmental site assessment regarding the subject property.[29] The site is listed on the leaking underground storage tank (LUST) list. On-site buildings have potential asbestos containing materials and may also contain lead based paints, as evidenced by their age.

Sunset Avenue Project. Previous long-term use of the Sunset Avenue Project site, first as a railway yard, and subsequently as a diesel bus maintenance facility has yielded evidence in an environmental site assessment that confirms the presence of soil and groundwater contamination.[30] The site is listed on the Cortese List for a LUST, though no off-site

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[27] *"Geotechnical Engineering Study Proposed MTA Transportation Center," Advanced Geotechnical Services, Inc., October 23, 2003. "Fault-Rupture Assessment in the Alquist-Priolo Hazard Zone Proposed MTA Transportation Center," UltraSystems Environmental Inc., March 2004.*

[28] *"Report of Phase I Environmental Site Assessment MTA Div. 6 Maintenance Facility & Bus Yard," MACTEC Engineering and Consulting, Inc., March 5, 2004.*

[29] *"Soil Assessment Report Former McKesson Products Site 3475 South La Cienga Blvd Los Angeles, California," Environmental Support Technologies, Inc., July 22, 2003.*

[30] *"Soil Assessment Report Former McKesson Products Site 3475 South La Cienga Blvd Los Angeles, California," Environmental Support Technologies, Inc., July 22, 2003.*

contamination sources have been identified. Asbestos containing materials and lead based paints may be found within on-site buildings as indicated by their age.

SURFACE WATER QUALITY

West Los Angeles Transportation Facility. This area is located within the Santa Monica Bay Watershed Management Area of the Los Angeles Basin. This Watershed includes coastal plains, which are predominately lowland areas bounded on the west and south by the Santa Monica Bay and on the north and east by several discontinuous ranges of mountains and hills. Coastal ranges rise in elevation from sea level to a varying elevation averaging about 500 feet at the base of the mountains.[31] Natural drainage for the West Adams-Baldwin Hills-Leimert community flows towards the Ballona Channel. This waterway has been modified from its natural condition to its current use as the major flood control channel for the Los Angeles Basin. The area in the vicinity of the West Los Angles Transportation Facility is relatively level with slight rise in elevation due to the Baldwin Hills south of the site. This area has compliance issues for the Ballona Channel's water quality despite storm water infrastructure to divert direct drainage to the waterway. Groundwater is also impaired in the Santa Monica Bay Watershed Management Area due to reduced levels, contamination plumes and seawater intrusion.

Sunset Avenue Project. Location of this project site is also within the Santa Monica Bay Watershed Management Area of the Los Angles Basin. Similarly this area has the coastal plains topography described above with the addition of coastal sand dunes and a lower elevation range of about 30 feet. This area is adjacent to the Santa Monica Bay and natural drainage flows south toward the Ballona Channel.[32] This portion of the Ballona Channel meets with the Ballona Wetlands and as such the area has strict water quality regulations. Storm water infrastructure for this area collects runoff to avoid direct drainage to natural waterways. Groundwater impairment as described previously for the Santa Monica Bay Watershed Management District also includes this area.

LAND USE

West Los Angeles Transportation Facility. The project site is located within a relatively large concentration of mixed light industrial and commercial land uses that extends

[31] *City of Los Angeles, Dept. of Public Works, Bureau of Engineering, Wastewater Facilities Plan Update, June 1989.*

[32] *Report of Phase I Environmental Site Assessment MTA Div. 6 Maintenance Facility & Bus Yard," MACTEC Engineering and Consulting, Inc., March 5, 2004.*

easterly to La Cienega in the City of Los Angeles and across the Ballona Channel into the City of Culver City. Residential uses in single-family and multiple-family neighborhoods are situated around the periphery of the industrial/commercial area in both cities. Land use in the immediate locale, including the project site, within the City of Los Angeles is regulated by the West Adams-Baldwin Hills-Leimert Community Plan, one of 35 local area plans that collectively comprise the Land Use Element of the City of Los Angeles General Plan. The Community Plan prescribes a system of goals, objectives, and policies intended to guide land use and development over time. The project site and immediately adjoining properties to the north, northeast, and south are designated for industrial uses while property to the southeast is designated for commercial purposes. Consistent with this Community Plan designation, the project site is zoned Restricted Industrial (MR-1) by the Los Angeles Municipal Code (LAMC).

Sunset Avenue Project. This site is located in the western part of the Venice Community within the City of Los Angeles. Land development in this area began in the earliest part of the twentieth century with rail lines and property interests collaborating to create tourist destinations and speculative real estate ventures, particularly in those areas closest to the beach. The resulting land use pattern extending westerly from Main Street is one of mixed-density, small lot residential development, most of which predated the advent of land use regulation via such instruments as general plans or zoning. The site, itself, first developed in transportation infrastructure as, or even before the surrounding community was emerging, but at a time when greater tolerance between juxtaposed but differing uses may have been extant. Today, the site is subject to the guidance of the Venice Community Plan which is part of the Land Use Element of the City of Los Angeles General Plan, and to the Venice Coastal Specific Plan which implements the goals and policies of the California Coastal Act since this property is within the Coastal Zone. While it is designated for industrial purposes by the Community Plan consistent with historic use there, the Specific Plan designated the site Commercial Manufacturing (CM) which designation incorporates multi-family residential provisions associated with the R3 zoning district.

NOISE

West Los Angeles Transportation Facility. The primary source of noise in the vicinity of the project site is traffic and local roadways, where sound level varies directly with traffic volumes. Noise from local manufacturing activities would be intermittent since most such activities are fully enclosed within buildings designed for that purpose. No noise is produced at the vacant project site at this time. The nearest sensitive noise receptors such as residential uses, schools, or hospitals are located beyond the concentration of industrial property of which the site is a part. Residential uses do, however, exist within proximity of the major roadways serving the project area.

Sunset Avenue Project. Traffic on local streets, in particular Main Street and Pacific Avenue, is also the primary source of noise in Venice near the project site. Many residences located close to these thoroughfares have little to buffer this traffic noise. The existing Division 6 bus maintenance facility also generates intermittent noise until 11:00 P.M. on weeknights which is audible at nearby residences. Also, intermittent noise associated with general aviation overflights from Santa Monica Airport located 2.5 miles northeast of the site is also prevalent in the project locale.

TRANSPORTATION AND PARKING

West Los Angeles Transportation Facility. The project site is located within a complex urban area in which the demand for mobility is also very intense and will only increase as forecasted population and economic growth across the region continues to occur. Although the private automobile has been the foremost and predominant modal choice for many decades, the capacity limitations and attendant environmental consequences of over-reliance on this mode are already apparent. Congestion along La Cienega Boulevard east of the site and its intersections with Jefferson and Rodeo Boulevards is indicative of this circumstance. At the same time, demand for alternative modes of travel is growing, indicating that expanded and improved bus service throughout the Westside of Los Angeles will be increasingly necessary. Metro's proposed Mid-City/Exposition Light Rail Transit Project, which will provide rail connections from the Venice/Robertson area to Downtown Los Angeles through the project area, is also in response to the growing need for more comprehensive transit options. The Rodeo/Jefferson corridor to the south, the National/Jefferson corridor to the north, and the adjoining segment of Jefferson Boulevard between these two corridors all carry heavy traffic volumes. Nonetheless, due to rather expansive surface parking resources serving nearby land uses, on-street parking demand in the immediate site vicinity is comparatively light.

Sunset Avenue Project. The coastal areas of the Venice community are somewhat access constrained by virtue of a land use pattern that predates the development of circulation infrastructure intended to accommodate the region's current reliance on the private automobile. Mid-week peak hour congestion occurs along Main Street and Pacific Avenue northerly from Venice Boulevard into the Ocean Park community in Santa Monica. During the warmer season, weekend holiday influx of visitors to nearby beaches also generates weekend congestion. However, inadequate parking capacity to address the complex of residential, commercial, and recreational parking demand is, perhaps, the most aggravating circulation deficiency in this project area.

UTILITIES

West Los Angeles Transportation Facility. The City of Los Angeles Department of Water and Power (DWP) is the water service provider for the entire City. DWP ensures potable water meets applicable state health standards. Water for the semi-arid region of the Los Angeles Basin comes from local groundwater resources and also from the Owens Valley and the Colorado River.[33] The existing capacity of this site's water service is sufficient for both domestic and fire flow requirements via two nearby water mains.[34] Wastewater generated in the City of Los Angeles is collected and treated by the Department of Public Works, Bureau of Sanitation. There are two treatment facilities and two reclamation facilities serving the City and other unincorporated areas through contractual agreements for specific quantities of discharge. The Bureau of Engineering provides design and construction engineering capabilities for the City's wastewater system. Existing wastewater infrastructure on-site includes an 8-inch sewer lateral that has capacity for an operational light industrial use; however, the site is currently vacant with no wastewater discharged into the system.

Sunset Avenue Project. Location of the Sunset Avenue Project is also within the City limits of Los Angeles and as such is provided with water service from the Department of Water and Power with wastewater collection provided by the Department of Public Works, Bureau of Sanitation. Current water service is provided to the site from four nearby water mains and is sufficient for both domestic and fire flow requirements. Existing wastewater infrastructure on-site includes two 6-inch sewer mains that accommodate the site's current capacity needs.[35]

[33] *Los Angeles Department of Water and Power website, "Major Aqueduct Systems Serving Southern California," www.ladwp.com/ladwp/cms/ladwp001372.jsp.*

[34] *Mollenhauer Group, Utility Study for Division 6 – Bus Facility, April 30, 2004.*

[35] *Mollenhauer Group, Utility Study for Sunset Avenue, April 30, 2004.*

III. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING
B. RELATED PROJECTS

The California Environmental Quality Act (CEQA) requires that Environmental Impact Reports (EIRs) analyze cumulative impacts. CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." In addition, CEQA Guidelines Section 15130 (b) indicates that the analysis of cumulative impacts need not be as in-depth as what is provided relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness."

Cumulative impacts are anticipated impacts of the project along with reasonably foreseeable growth. According to CEQA Guidelines Section 15130(b)(1), reasonably foreseeable growth may be based on either of the following:

- A list of past, present, and probable future projects producing related or cumulative impacts including, if appropriate, those projects outside the control of the agency; or

- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Due to the fully developed character of the subregions surrounding both the West Los Angeles Transportation Facility site and the Sunset Avenue Project site, the former approach listing known, past, present, and probable future projects has been employed in this Draft Environmental Impact Report. Cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary. For example, a cumulative visual impact generally could only affect the area within the view of the project site, while a cumulative air quality impact could affect the entire South Coast Air Basin. The cumulative study area of each environmental issue is identified in the applicable environmental issue section in Chapter IV, Environmental Impact Analysis, of this EIR.

West Los Angeles Transportation Facility. In order to identify specific development projects with the potential to cumulatively effect the same environment as the proposed project, development databases maintained by the City of Los Angeles Department of Transportation and the City of Culver City were consulted. Eleven such projects representing an array of project

types, including residential, commercial, industrial, institutional and infrastructural uses and facilities, were identified in both cities as listed in Table III-1 on page 90 and located relative to the project site in Figure III-1 on page 91.

One of the related projects, Related Project 11, is being implemented by the Metropolitan Transportation Authority. The Exposition Light Rail Transit (LRT) Project is a proposed 9.6-mile-long line extending along the MTA-owned Exposition right-of-way from the existing Metro Rail station at 7th/Metro Center in downtown Los Angeles to Venice Boulevard and Washington Boulevard in Culver City. Groundbreaking is to occur in 2007, with completion to Culver City by year 2012. One of the LRT stations is located at La Cienega Boulevard and Jefferson Boulevard in the vicinity of the proposed project. The LRT will use an elevated bridge structure to cross over La Cienega Boulevard, and the Station will be located atop an elevated structure. The station will include approximately 530 parking spaces that will be provided in a parking structure located in the southeast quadrant of the intersection of La Cienega Boulevard and Jefferson Boulevard.

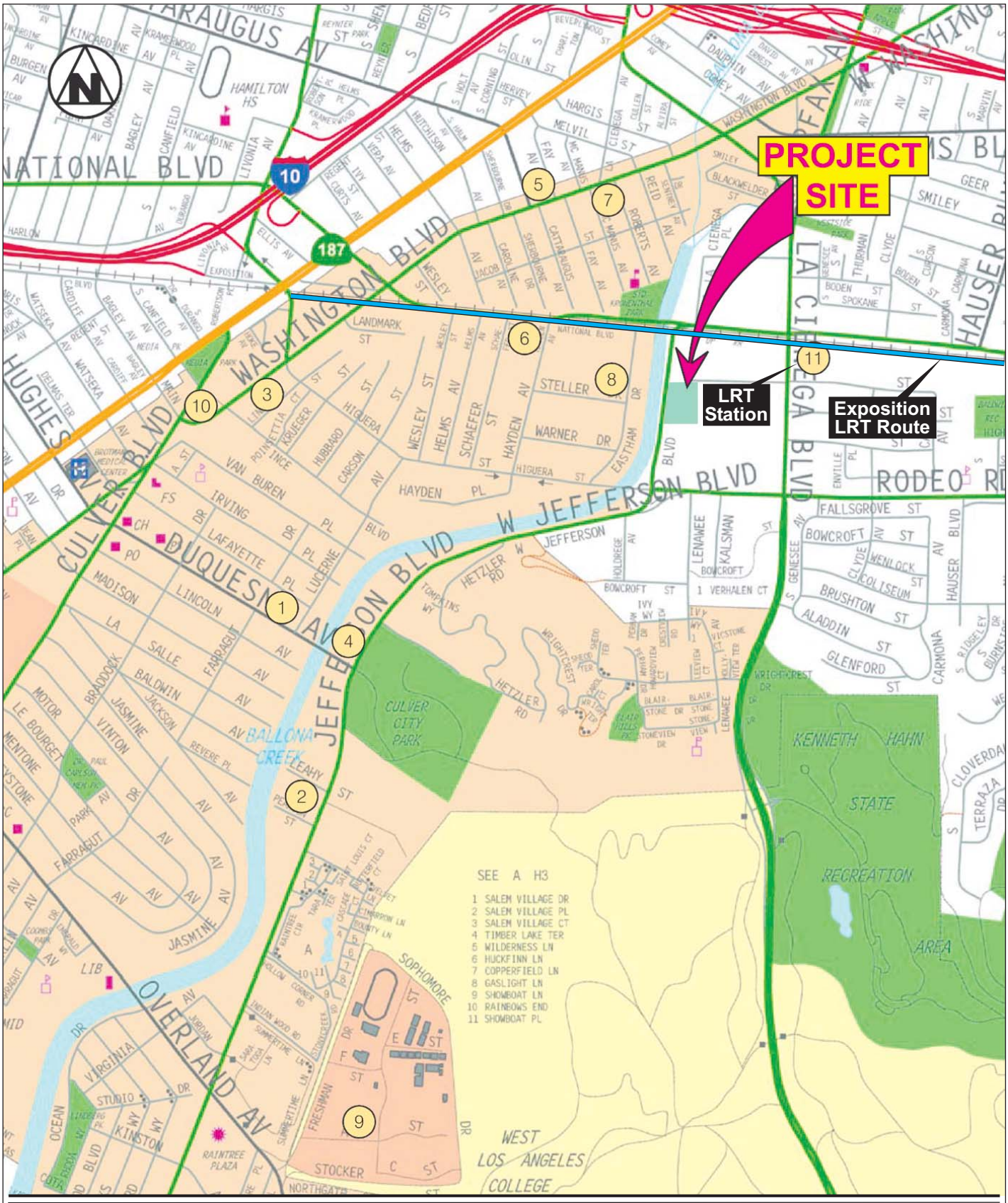
Sunset Avenue Project. In the case of the Sunset Avenue site, the City of Los Angeles Department of Transportation database was again consulted, as was the comparable database maintained by the City of Santa Monica. These inquiries revealed twenty-one projects in the coastal areas of both cities across a wide spectrum of project types, including residential, commercial, industrial and civic uses, as listed in Table III-2 on page 92 and located in Figure III-2 on page 94.

Table III-1

WEST LOS ANGELES TRANSPORTATION FACILITY
RELATED PROJECTS DESCRIPTIONS

No.	Proposed Use	Size	Location
1.	Apartment	8 units	4210 Duquesne Avenue
2.	Industrial	250,000 s.f.	10100 Jefferson Boulevard
3.	Office	27,000 s.f.	9050 Washington Boulevard
4.	Office/Condo	28 units	599 Jefferson Boulevard
5.	Office/Apts.	25,969 s.f.	8601 Washington Boulevard
6.	Office	151,000 s.f.	3505 Hayden Avenue
7.	Live/Work	25' lot	8500 Washington Boulevard
8.	Live/work	11,000 s.f.	3525 Eastham Drive
9.	College	Phase I	West L.A. College
10.	Mixed Use	—	9300 Culver Boulevard
11.	Exposition Light Rail Project (LRT)/LRT La Cienega Station	530 spaces	SEC Jefferson/La Cienega

Source: Overland Traffic Consultants, Inc., April 2004.



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Not To Scale

Figure III-1
West Los Angeles Transportation Facility Related Project Locations

Source: Overland Traffic Consultants, Inc.

Table III-2

SUNSET AVENUE PROJECT
RELATED PROJECTS DESCRIPTIONS

No.	Proposed Use	Size	Location
1.	Mixed-Use	111 townhomes and 6,000 sf office less 86,563 sf office	SWC Washington Boulevard & Via Dolce
2.	Mixed-Use Second Generation	531 Apartments 288 Room Hotel 125 Boat Slips 2 Acre Park	E/S Via Marina S/O Marquesas Way
3.	Mixed-Use Second Generation	960 Apartments 241 Senior Apts. 4,000 s.f. retail 439 boat slips	E/S Via Marina S/O Panay Way
4.	Mixed-Use	100 Apartments 6,885 s.f. commercial	Parcel 20 Panay Way
5.	Mixed-Use	80 lofts 40,000 s.f. storage less 32,000 s.f. storage	1046 Princeton Street
6.	Apartments	300 dwelling units	Princeton Street and Carter Avenue
7.	Retail/Restaurant	42,270 s.f. retail 9,200 s.f. restaurant	4141 Lincoln Boulevard
8.	Office	15,180 s.f.	2100 Abbot Kinney Boulevard
9.	Gas Station	6 pumps and 720 sf mini mart	2005 Lincoln Boulevard
10.	Mixed-Use	197,000 s.f. retail 280 unit apartments	1430 Lincoln Boulevard
11.	Condominiums	35 units	s/o 615 Hampton Drive
12.	Art Lofts	51 dwelling units	615 Hampton Drive
13.	Mixed-Use	9,000 s.f. retail 24 condominiums	212 Marine Street
14.	Apartments	44 units	2209 Main Street
15.	Mixed-Use	6,553 s.f. retail 26 apartments	2021 - 29 Main Street
16.	Mixed-Use	11,549 s.f. retail 107 apartments	2012 - 24 Main Street
17.	Condominiums	9 units	125 Pacific Street
18.	Civic Center Garage	12,500 s.f. retail 885 parking spaces	1685 Main Street

Table III-2 (Continued)

SUNSET AVENUE PROJECT
RELATED PROJECTS DESCRIPTIONS

No.	Proposed Use	Size	Location
19.	RAND Headquarters	308,900 s.f. less existing 295,000 s.f.	1700 Main Street
20.	Playa Vista	Phase 1 3,246 units 3,241,950 s.f. office 35,000 s.f. retail 120,000 s.f. public/civic Phase 2 – Village at Playa Vista 2,600 units 175,000 s.f. office 150,000 s.f. retail 40,000 s.f. community serving	Jefferson & Lincoln Boulevards
21	Pioneer Bakery	70 condominiums 3,953 s.f. restaurant 1,726 s.f. bakery/retail	512 Rose Avenue

Source: Overland Traffic Consultants, Inc., April 2004.

PCR

Not To Scale

Figure III-2
Sunset Avenue Project
Related Project Locations

Source: Overland Traffic Consultants, Inc., 2004

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
A. AESTHETICS

1. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) West Los Angeles Transportation Facility

Site Characteristics. The West Los Angeles Transportation Facility site is a vacant parcel with abandoned buildings surrounded by a chain link fence. There is no ornamental landscaping and the site's asphalt pavement is cracked and overgrown with weeds and other volunteer vegetation. There is currently no night lighting on the project site. The site is illustrated relative to surrounding land uses and locations of several photographic views in Figure IV.A-1 on page 96. Photographs of the site, itself, are shown on Figure IV.A-2 on page 97.

Visual Characteristics of the Surrounding Community. The project site is located in an area of West Los Angeles, the visual character of which is established with long city blocks of industrial buildings adjoined by small and large retail developments with store frontages behind surface parking lots. Representative photographic views of surrounding areas are shown on Figure IV.A-3 on page 98. These uses are surrounded by residential neighborhoods to the east in the City of Los Angeles and to the north, northwest and west in the City of Culver City and the Baldwin Hills to the south. The industrial uses are delineated by large, one- to two-story buildings with open parking lots. The small commercial centers are one-level buildings along arterial corridors, while the large commercial areas follow the industrial building design of one- to two-story buildings set back from the street across open parking.

Two of the more prominent visual features of this community are the Ballona Channel and the Baldwin Hills. The channel, which is the largest such flood control facility in West Los Angeles, is directly across Jefferson Boulevard from the project. While entirely comprised of concrete, it nonetheless creates a wide expanse of visual open space. The Baldwin Hills are an expansive natural landform, the nearest portions of which are northfacing hillsides. The raised and varied landforms within the Baldwin Hills provide visual contrast to and natural relief from the surrounding urban plain less than one mile to the south of the site. The Kenneth Hahn State Recreation Area, a public recreation and open space amenity with both developed and developing recreational uses, occupies some 600 acres along the upper parts of these hills. The

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Photograph Locations

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Not To Scale

Source: Landiscore, 2004

Figure IV.A-1
West Los Angeles Transportation Facility
Surrounding Land Uses
and View and Photo Locations

Photograph 1

Photograph 2

Photograph 3

NOTE: Photo Locations are shown on Figure IV.A-1

PCR

Figure IV.A-2
West Los Angeles Transportation Facility
Photos of the Project Site

Source: PCR Services Corporations, 2004

Photograph 4

Photograph 5

Photograph 6

Photograph 7

NOTE: Photo Locations are shown on Figure IV.A-1

PCR

Figure IV.A-3
West Los Angeles Transportation Facility
Photos of the Surrounding Area

Source: PCR Services Corporations, 2004

Blair Hills residential neighborhood is nestled into a northfacing cove in the Baldwin Hills, while several hundred acres further to the south remain in long-term open space disruption associated with an oil field. Much of this latter area is slated for acquisition over time and conversion to a combination of recreational open space and restored natural habitat by the newly formed Baldwin Hills Conservancy. Commercial and industrial uses adjacent and across the channel can view the project site with little obstruction. From the south and southeast, homes on north-facing hillsides have a low viewing angle of the site.

View Corridors and Resources. The project site is located within a large urbanized area without notable natural features or unique view resources in the immediate vicinity. The Baldwin Hills to the south of the project site provide an important scenic backdrop to large portions of the metropolitan Los Angeles area, inclusive of the project site, and are considered a valued view resource. The project site does not lie within the viewshed of any designated scenic highway, corridor, or parkway.

Views of the project site are limited due to the site's location within generally level surrounding terrain and relatively dense urban development which obstructs views of the site from most locations. The most accessible views of the site occur from the adjoining segment of Jefferson Boulevard, a public thoroughfare, and from across the Ballona Channel. Visitors to adjacent industrial/commercial properties can see the sides and rear of the site. More elevated views of the site are also available from varied locations across the Baldwin Hills, though at greater distances.

(2) Sunset Avenue Project

Site Characteristics. The Sunset Avenue Project site encompasses an entire city block with opaque fencing, solid walls, and, in places, screening vegetation enclosing the site. On-site are several buildings of non-descript, industrial appearance, with the majority of the property paved for use as a diesel bus maintenance yard and parking lot for employees. Much of the site is illuminated until 11:00 P.M. on weeknights in support of ongoing maintenance operations. This is illustrated relative to surrounding uses and views. The locations of several photographic views of the site and its surroundings are presented in Figure IV.A-4 on page 100. Photographs of the site are presented in Figure IV.A-5 on page 101.

Characteristics of the Surrounding Community. The project site is located in the older part of the Venice Community, a block and one half from Venice Beach and Santa Monica Bay. Representative photographic views of surrounding areas are presented in Figure IV.A-6 on page 102. Residential development to the north, west, and south of the site consists of a compact built environment organized along narrow streets, alleys, and walk streets. The resulting dense,

Photograph Locations

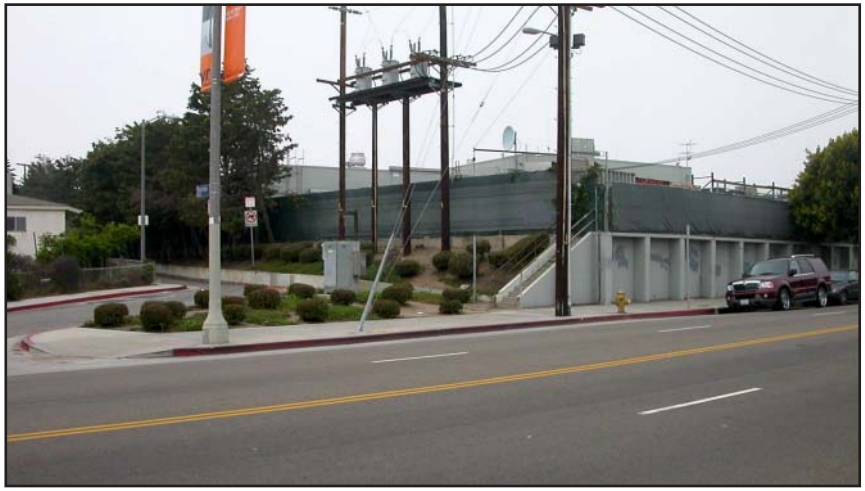
Not To Scale

Source: Landiscor, 2004

Figure IV.A-4
Sunset Avenue Project
Surrounding Land Uses
and View and Photo Locations

Photograph 8

Photograph 9



Photograph 10

Photograph 11

NOTE: Photo Locations are shown on Figure IV.A-4

PCR

Figure IV.A-5
Sunset Avenue Project
Photos of the Project Site

Source: PCR Services Corporation, 2004

Photograph 12

Photograph 13

Photograph 14

Photograph 15

Photograph 16

Photograph 17

Photograph 18

NOTE: Photo Locations are shown on Figure IV.A-4

Figure IV.A-6
Sunset Avenue Project
Photos of the Surrounding Area

Source: PCR Services Corporation, 2004

small-lot residential land use pattern and associated improvements create a complex composite of varied building sizes, forms, and design styles, which in large part derive from earlier eras. Main Street, located along the eastern edge of the project site, demarcates a change between development characteristics to the east and west. Development across Main Street to the east, which was formerly developed with industrial facilities postdating the beach-oriented residential neighborhoods to the west, has, in recent years, been redeveloping with a mix of commercial and residential uses on much larger properties than exist west of Main Street. In contrast to the highly varied composition of views to and within the residential areas west of Main Street, developed properties along the east side of Main Street present large blocks of more integrated, unified forms.

Visible open space in this part of Venice is rare, and observable vegetation is limited to occasional street trees and what grows above fenced yards. Despite gently varied terrain due to underlying sand dunes, variations in ground elevations are not predominant shapers of the appearance of the project locale. Rather, the appearance is more attributable to the highly varied built form in the surrounding locale.

View Corridors and Resources. The project site is part of a highly urbanized area. The most notable view resource in the vicinity is the coastline along Santa Monica Bay with its beach, shoreline, and boardwalk located several blocks to the west of the project site. The coastline is located out-of-view beyond intervening residential neighborhoods and is not a component of the project site's specific view setting. The project site does not lie within the viewshed of any designated scenic highway, corridor, or parkway. One notable feature of the site, the "You Are Not Forgotten" mural located along Pacific Avenue, contributes to the view conditions along Pacific Avenue. The relevance of this feature is addressed in Section IV.C, Cultural Resources, of this Draft EIR, where it is recognized for commemorative value.

Views toward and over the project site are limited due to the developed nature of the project area, with intervening development obstructing views from most areas. Views into the site, itself, are largely obstructed by perimeter screening. The most accessible public views of the project site are from Main Street and Pacific Avenue. Direct views of portions of the site are also available from pedestrian ways and residences across Sunset and Pacific Avenues and Thornton Place. More distant, private views over the project site may also be available from some limited locations in taller buildings in the larger neighborhood.

b. Regulatory Framework

West Los Angeles Transportation Facility. The West Adams-Baldwin Hills-Leimert Community Plan provides objectives for community development and for industrial development in particular. Objective 1-1.2 addresses the design of industrial developments.

Objective 1-1.2. Require that projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with existing uses.

This objective is tied to design standards for industrial development in Chapter V, Urban Design, of the Community Plan, which is implemented through the West Adams-Baldwin Hills-Leimert Community Design Overlay District. The overlay district, presented as an Appendix to the Community Plan, includes standards for industrial development. However, the standards are only applicable to such uses in M-zoned lots that abut or are directly across an alley or public street from residentially zoned property. The proposed project is located within an industrial zoned area and is some 700 feet from the nearest residential property. Therefore, this project site is not subject to those specific design guidelines.

The City regulations that most affect the appearance of the development of the project site are those associated with the zoning restrictions that affect the use, size, and location of buildings. The Restricted Industrial Zone (MR1), Section 12.17.5 (Subsection B.5.g) of the LAMC, allows for the parking of trucks or buses provided the use is "within a completely enclosed building or within an area enclosed on all sides with a solid wall or solid fence not less than six feet in height." Subsection D.1 of the same Section requires 15-foot front yard setbacks on lots in excess of 100 feet in depth, specifying that: "All front yards shall be suitably landscaped and maintained except for necessary driveways and walkways." Building bulk and height are controlled by the site's 1VL height district designation, which establishes a maximum FAR of 1.5:1 for M zones and a 45-foot height limit for non-residential structures. However, as described further in Section IV.G, Land Use, under Section 53090 et seq. of the California Government Code, Metro is not required to comply with City of Los Angeles zoning regulations for the development of property located in the City of Los Angeles, as the proposed project is a rapid transit facility.

The City has also incorporated into the Los Angeles Municipal Code (LAMC) several requirements pertaining to lighting within development projects. In addition, the City relies on mitigation measures cited in environmental documentation prepared pursuant to the California Environmental Quality Act for additional lighting provisions in instances necessitated by potential project impacts. Sections of the Municipal Code which are relevant to the project site include the following:

Chapter 1, Article 2, Sec. 12.21 A5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and any adjacent premises.

Chapter 1, Article 7, Sec. 17.08C. Plans for street lighting systems shall be submitted to and approved by the Bureau of Street Lighting.

Sunset Avenue Project. The Venice Community Plan (Community Plan), Venice Local Coastal Program Land Use Plan (Coastal Land Use Plan) and Venice Coastal Zone Specific Plan (Specific Plan) provide guidelines related to aesthetics that apply to the Sunset Avenue Project site.[36]

The Community Plan includes policies and design guidelines to address the quality of the environment. These policies and guidelines are intended to be utilized by decision-makers when reviewing individual projects. They are also a basis for preparing regulations that may be applied to individual projects.

Goal 2 of Chapter III includes guidelines for commercial development and contains the following policies:

> 2-2.3. Require that mixed-use projects and development in pedestrian-oriented areas are developed according to specific design guidelines to achieve a distinctive character and compatibility with surrounding uses.
>
> 2-3.2. Preserve community character, scale and architectural diversity.
>
> 2-3.4. Establish street identity and character of commercial areas through appropriate sign control, landscaping and streetscape improvements.

Chapter V, Design Guidelines, of the Community Plan specifically addresses urban design. It includes one guideline specific to mixed-use developments, which states: "Maximize commercial uses on the ground floor by requiring 10 percent of commercial development to serve needs of the residential portion of the building." Other Community Plan design guidelines are expressed for commercial and multiple-family residential developments. Commercial policies require that structures shall be oriented toward the commercial street, as well as avoid pedestrian/vehicular conflicts. Pedestrian safety is accomplished through appropriate location of parking, driveways, and business entrances. This policy also requires landscaping, speed bumps and the screening of mechanical equipment to avoid pedestrian/vehicular conflicts. The policies for commercial uses require that buildings be designed to a pedestrian scale and integrate parking structures to complement the building design. Commercial policies also require that surface parking be landscaped and that light be oriented away from residential uses and toward walkways.

[36] *The Community Plan was updated September 29, 2000. The Coastal Land Use Plan was adopted October 29, 1999. The Specific Plan became effective January 19, 2004.*

The Community Plan also provides design guidelines for multiple-family residential uses including site planning and design. To the extent feasible, all multiple-family residential uses with five or more units should be designed around a landscaped focal point or courtyard. Buildings should also be designed to "avoid excessive variety or monotonous repetition." This is accomplished through building articulation, materials selection, and design features. Community design and landscaping guidelines are also included in the Community Plan to address the appearance of entryways, streetscapes, street trees, street furniture, street lighting, sidewalks/ paving, and public open space and plazas.

The Venice Local Coastal Program Land Use Plan has been prepared to protect coastal resources. As such, it includes local policies to address Coastal Act Policies established in Chapter 3 of the California Coastal Act. Section 30251 of Chapter 3 pertains to aesthetic issues:

> "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas."

Policies in the Coastal Land Use Plan address building density and heights, and design guidelines regarding commercial development address landscaping, lighting, and signage. Policies in this Plan are consistent with those in the Community Plan. Both Plans are implemented through the Venice Coastal Zone Specific Plan.

The Venice Coastal Zone Specific Plan is the implementation mechanism for the Community and Coastal Land Use Plans and, therefore, establishes regulations that are intended to affect the massing of new buildings and building modifications, one of the primary determinants of the aesthetic impacts such buildings may have. Land Use and Development Regulations for the North Venice Neighborhood in which the project is located are presented in Section 10.F, and Section 11.B. The height and setback regulations are as follows:

> 10.F.2.b. Density in Commercial Zones. No residential Venice Coastal Development Project on a commercially-zone lot shall exceed the density permitted in the R3 Zone.
>
> 10.F.3.a. Venice Coastal Development Projects with a Flat Roof shall not exceed a maximum height of 30 feet; or 35 feet for Venice Coastal Development Projects with Varied Rooflines, provided that any portion of the roof that exceeds 30 feet is set back from the required front yard at least one foot in depth for every foot in height above 30 feet. (Sections 9.B and 9.C provide guidance on height measurements and roof structures.)

10.F.4.a The front yard setback for all residential Venice Coastal Development Projects shall be consistent with LAMC requirements, but shall not be less than five feet. Ground level patios, decks, landscaping and railings, walls, and fences that do not exceed six feet in height may encroach into this setback, provide they observe a setback at the building line.

11.B.3. Commercial Development – Floor Area Ratio. In all commercial zones, floor area ratio (FAR) shall be limited to: … 1.5 to 1 for retail and/or office and residential.

2. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of aesthetics includes evaluation of four types of potential impact associated with the physical characteristics of the proposed projects. These include potential impacts on aesthetic character, views, illumination, and shading.

The evaluation of impacts on aesthetic character is based upon the potential for the proposed projects to result in detrimental changes to visual resources or general aesthetic character, and the relationship of these site characteristics to the surrounding environment. The project locales were evaluated to identify valued visual resources or visual qualities, including natural and built features in the area and the surrounding viewshed. This was done through field surveys, photographic interpretation, topographic analysis, and analysis of historic development patterns.

The evaluation of potential impacts on view access is based upon the project's potential to result in changes to views within and near the project site as perceived by the public (e.g., motorists and pedestrians on nearby streets and public rights-of-way) and private citizens (e.g., residents and property owners in the vicinity). This analysis addresses the degree to which proposed development may obstruct or detract from existing views from representative viewing locations. The identification of views within the project site and surrounding area was accomplished through field surveys, photographic documentation, and topographic analysis.

The assessment of potential illumination impacts was based on an evaluation of potential changes to on-site land uses, building materials with regard to potential glare, and nighttime lighting sources and the resulting effects on identified sensitive receptors.

The assessment of potential shading impacts was based on an evaluation of potential shading on nearby sensitive uses. Diagrams were prepared that simulate the amount of shading that would occur to adjacent sites at various times of the year.

b. Thresholds of Significance

Aesthetic Character. The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide" for consideration on a case-by-case basis in making a determination of significance regarding aesthetic character:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community or localized area, which would be removed, altered, or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which a proposed zone change would result in building that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

Under significance thresholds that are based on these factors, a project would have a significant impact on aesthetics, if:

- ☐ The project would substantially and permanently detract from the valued visual character of a community, neighborhood or localized area by conversion of large areas of visible natural open space, or valued visual resources; or
- ☐ The project introduces substantial contrast between proposed project elements and existing features that embody the area's valued aesthetic image; or

- ☐ The project represents substantial inconsistencies with the aesthetic goals and policies of the plans and regulations applicable to the project site..

Views. The following factors are set forth in the City of Los Angeles' "L.A CEQA Thresholds Guide," for consideration on a case-by-case basis in making a determination of significance regarding views:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);
- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

Under significance thresholds that are based on these factors, a project would have a significant impact on views, if:

- ☐ The project would obstruct any part of valued views available from a designated scenic highway, corridor or parkway; or
- ☐ The project would substantially alter views of valued viewsheds.

Illumination. The following factors are set forth in the City of Los Angeles' "L.A CEQA Thresholds Guide," for consideration on a case-by-case basis in making a determination of significance regarding illumination:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas

Under a significance threshold that is based on these factors, a project would have a significant illumination impact if:

- The project introduces new sources of light that would substantially affect nighttime views or substantially illuminate adjacent, off-site, light-sensitive uses.

Shading. The following threshold is set forth in the City of Los Angeles "L.A CEQA Thresholds Guide":

- "A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early April and late October)."

c. Analysis of Project Impacts

(1) West Los Angeles Transportation Facility

Analysis of Impacts on Aesthetic Character. The proposed project would result in the conversion of the currently vacant site into a new Transportation Facility. As seen from the interior of the project, the central part of the complex would be paved and reserved for bus parking while maintenance, supply storage, fueling, and administrative functions would be housed in low-rise structures one to three stories in height below or adjoining a parking deck for up to 240 employee vehicles. As seen from the primary public vantages along Jefferson Boulevard, the structural and functional elements, including parked buses, of the Transportation Facility would be screened by a decorative wall with a minimum height of eight feet, behind a landscaped buffer between the wall and Jefferson Boulevard that would soften the project appearance. This wall would continue around the remainder of the southern, eastern, and northern property lines, except where structures are to be located there, so that views of the Transportation Facility's interior will also be partially screened from adjoining private properties.

The proposed West Los Angeles Transportation Facility would convert the degraded, neglected character of the project site to the orderly, designed appearance of new improvements. A conceptual illustration of the project appearance is presented in Figure II-3 on page 70 of Section II, Project Description, of this Draft EIR, along with a site plan presented in Figure II-2 on page 69. The functional and efficient structures and related facilities will be consistent with, though more contemporary than, surrounding industrial and commercial improvements. Although the tallest proposed on-site structure may be somewhat taller than most nearby buildings, it would not substantially exceed the height character of the area, or maximum heights allowed in the area under zoning designations in the project vicinity. The proposed building masses will be on the order of one-fourth of the allowable floor area ratio of similarly zoned land

in the project area. While utilitarian in function and design, the facility will be well screened by a decorative perimeter wall with landscaping that will serve to soften the visual characteristics of structures and pavement that typifies the visual locale.

The project site is a formerly used, vacant pocket within a larger light-industrial district. It contains abandoned buildings, cracked pavement and weedy overgrowth. Therefore, the project would not detract from the valued visual character of the community, neighborhood or localized area by conversion of large areas of visible natural open space, or valued visual resources. Further, the proposed uses and general massing of site structures is typical of that found within the surrounding area. Building heights and lot coverage would not be greater than those found elsewhere in the area, and the general site appearance would have a similar light-industrial look. Project development would convert the site appearance from its degraded state to one with newly constructed, landscaped features. Therefore, the project would not introduce inappropriate contrast between project elements and existing features that embody the area's valued aesthetic image. Finally, the project would be consistent with aesthetic goals and policies of plans and regulations that are applicable to the project site. For these reasons, the West Los Angeles Transportation Facility would not have significant impacts regarding aesthetic character.

Impacts on Views. Views of the project site are limited and occur mainly from the adjoining segment of Jefferson Boulevard, from across the Ballona Channel in Culver City, and from some locations in the Baldwin Hills. Jefferson Boulevard is not a designated scenic roadway, and no existing views along Jefferson Boulevard would be obstructed by the project development. Views of the improved project site from the Baldwin Hills would be at distant, low viewing angles such that the Transportation Facility would blend into the surrounding urban plain. Therefore, views of and through the project site are limited. Further, as described above the project site does not comprise a valued viewshed, nor would project development cause obstruction of views to such a resource. Therefore, the proposed project would not substantially alter views of any valued viewsheds.

As noted above, Jefferson Boulevard is not a designated scenic roadway. Because of this fact, and the project's limited value as a view resource, the Transportation Facility would not obstruct any part of a valued view available from a designated scenic highway, corridor or parkway. Transportation Facility impacts on views would be less than significant.

Impacts on Illumination. The proposed project is surrounded by compatible light-industrial and commercial land uses that are not sensitive to nighttime illumination. The project site, itself, is currently unlit.

The project would be a 24-hour operation that would include exterior illumination for on-site visibility and security. Placement of wall and/or pole mounted lighting, foot candle levels,

and use of hoods or shields (to avoid light backwash) would comply with applicable City regulatory provisions to ensure that adjoining properties are not adversely affected. These regulations address lighting intensity, and the avoidance of off-site glare from direct lighting sources, where sensitive uses may be affected. Exact locations of the pole and/or wall-mounted lighting would be approved by the City of Los Angeles during plan review.

Implementation of the proposed project would increase the amount of site lighting from the existing unlit conditions with its nighttime illumination. Site lighting would be directed on-site and would not cause glare for traffic on Jefferson Boulevard nor into any adjacent uses. The project's general site illumination may be visible from specific locations in the Baldwin Hills to the south. However, such lighting would be typical of lighting in the area, and would not stand out against the greater city lights backdrop due to scale or illumination intensity. Therefore, the Transportation Facility would not substantially affect nighttime views or substantially illuminate adjacent, off-site, light-sensitive uses. In addition, the project would use standard, non-highly reflective building materials, typical of those used throughout the surrounding areas. Therefore, the project would not cause notable off-site glare during daylight hours, and would not adversely affect sensitive off-site activities. Impacts associated with site illumination would be less than significant.

Impacts on Shading. The proposed structures within the West Los Angeles Transportation Facility, including those housing maintenance, storage, and fueling functions, as well as the employee parking deck, are for the majority of the project site one level in height, and less than 20 feet tall. The tallest structure on the project site, and greatest potential source of shading would be the approximately 40 foot high, three-level administration building, located at the northeast corner of the project site. As no shadow-sensitive uses are located nearby and since project-related shadows would be minimal, shading impacts attributable to this project would be less than significant.

(2) Sunset Avenue Project

Impacts on Aesthetic Character. The proposed Sunset Avenue Project would replace the vacated Division 6 operation with a mix of residential and commercial uses supported by two levels of subterranean parking. Residential uses would occupy several individual structures that would each contain a varying number of dwelling units, with varied heights and shapes. One such structure would be aligned along Main Street, while three others are arranged more or less parallel to Sunset Avenue and Thornton Place in southern, central, and northern positions, respectively. Six smaller structures are interspersed between these larger buildings. This site plan is intended to extend part of the character provided by the streets with openings between rows of small residential properties north and south of the site and west of Pacific Avenue. Space between the individual structures would allow for communal walkways, common space

for recreation or garden areas, water features, and landscaping. A conceptual site plan and conceptual renderings are presented in Figure II-4 through Figure II-8 on pages 73 through 77 in Section II, Project Description, in this Draft EIR. An illustration of the project placed into an aerial photograph is presented in Figure IV.A-7 on page 114. Project sections are presented in Figure IV.A-8 on page 115.

The structure to be sited along Main Street would contain approximately 10,000 square feet of commercial space on the ground floor on the Thornton Place side of the property, while residential uses would occupy the balance of the ground floor and all of the upper floors. This building is to be set back approximately five feet from the Main Street property line, and the commercial uses are to be designed with direct pedestrian access from the street. The Main Street portion of this structure would include three residential levels and would not exceed 35 feet above the site's determined datum level. To the rear, the interior portion of the structure would contain variously three, four, and five residential levels with maximum height along its Thornton Place and Sunset Avenue frontages of approximately 31 feet and 45 feet, respectively, and with maximum height in the highest portion of the structure, oriented toward the interior of the project site, of approximately 56 feet. The remaining residential structures will mostly have four levels, though they step down to two and three levels at the Pacific Avenue frontage, where maximum height would not exceed 35 feet.

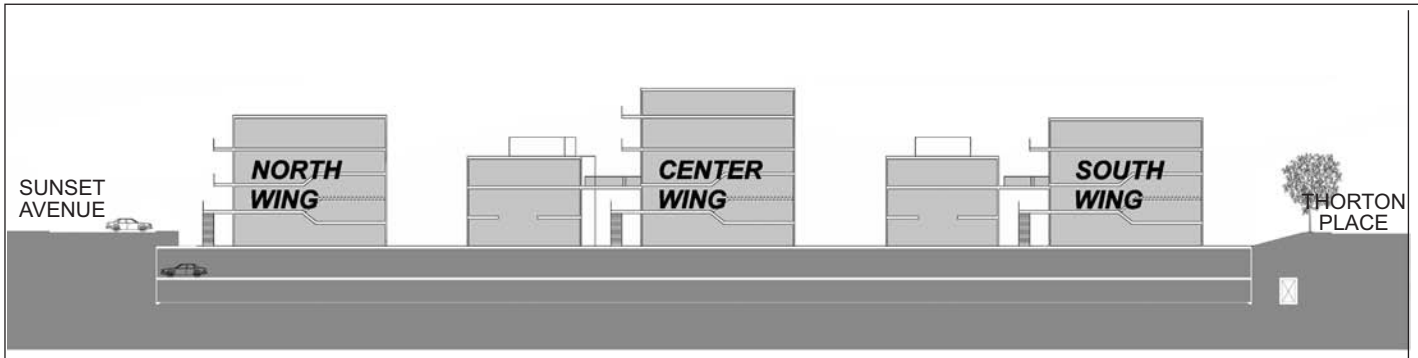
Setbacks would be five feet on Main Street and seven feet (from the relocated property line) along Pacific Avenue after a 17.5-foot right-of way dedication. Setbacks along Thornton Place and Sunset Avenue would be varied, ranging from a minimum of 5 feet to approximately 50 feet. Open spaces between structures along Main Street and Thornton Place would be utilized for outdoor café seating. Parking for business patrons, as well as residents and their visitors, would be located within the subterranean parking facility. Behind a wall of intermediate height, the site's residential perimeter would be landscaped with a variety of shrubs and trees to soften the structural presence and to create privacy and interest. The commercial space along Main Street would also see landscaping around the street, though in more open form in order to promote pedestrian accessibility.

This project would rather dramatically convert the site's current appearance from that of a somewhat isolated and degraded automotive maintenance facility to a new mixed-use development with interplay between building volumes and open spaces for indoor and outdoor use and with a modern palette of building materials, finishes, and landscape. Subject to personal preferences, such a change could be perceived as a major enhancement or as a loss of underdeveloped, albeit industrial, space amidst the urban setting.

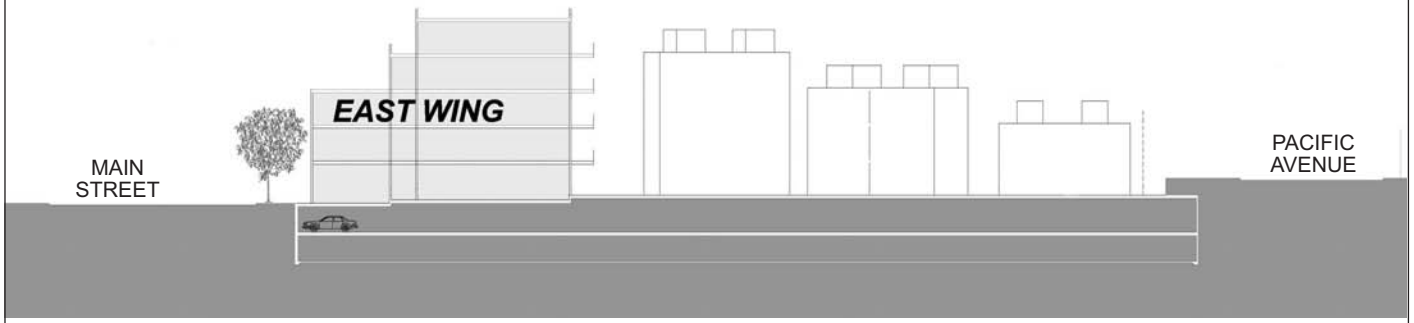
Changes in on-site visual character due to the Sunset Avenue Project and the resulting visual relationship with surrounding public rights-of-way and private properties would vary, as

Source: KoningEizenberg Architecture

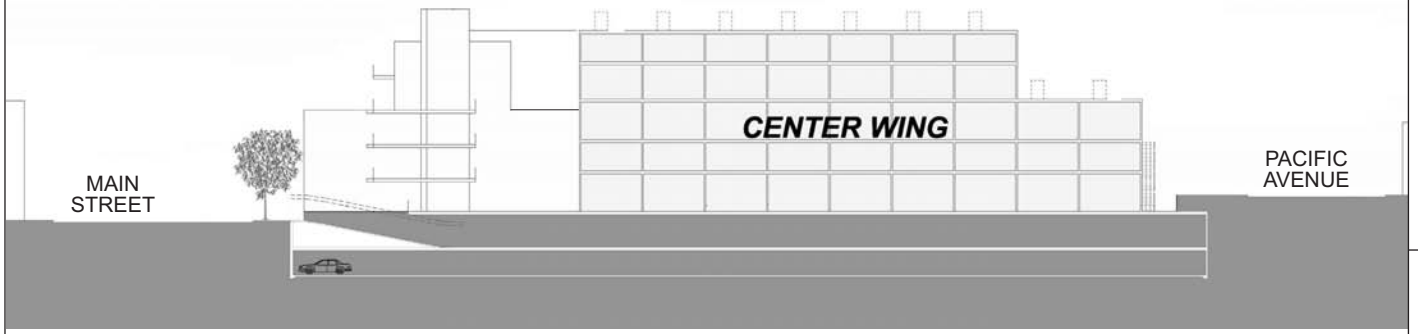
Figure IV.A-7
Sunset Avenue Project
Conceptual Design Concept and Venice Setting



SECTION A



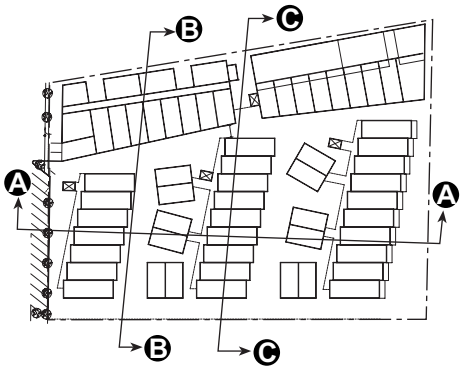
SECTION B



SECTION C

LEGEND

Section Key



Not to scale

Figure IV.A-8
Sunset Avenue Project
Project Sections

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Source: KoningEizenberg Architects

seen from each side of the project. Main Street is wide and offers easy, open views of the site to passing motorists and pedestrians. It also affords more separation between the site and emerging, new, multi-family residential uses across the street. The project is designed to address Main Street as a commercial street with all proposed commercial uses located on this frontage at street level or behind shallow terraces, readily affording pedestrian access. The buildings along Main Street will provide a limited, urban setback of five feet, and building height will not exceed 35 feet, as established by the Specific Plan. (The setback is five feet greater than the 0-foot commercial setback requirement established in the Specific Plan.) Higher building heights deeper into the site are proposed and would be visible from Main Street. This is normally expected along mixed commercial streets and is not without precedent on Main Street. The current character of Main Street as it extends from north of Rose Avenue to locations south of the project site and Abbot Kinney Boulevard is highly eclectic with a wide mix of building uses, sizes, and styles, and in which newer and older structure are well represented. The project would effectively contribute to this mix and would not be out of place by use or general appearance. The commercial uses would be pedestrian friendly and would contribute to a continuity of uses along Main Street The project would also cause the beneficial conversion of isolated, and no longer appropriately located transportation infrastructure facilities to appropriate urban improvements and form.

Visual character along Pacific Avenue is appreciably different than along Main Street. The street is narrower with vehicle traffic of higher speeds, serving primarily as a transportation corridor. Adjoining structures are almost all residential in character and uses. Virtually all of these are oriented to the walk streets perpendicular to Pacific Avenue on which they are addressed, presenting unadorned sideyard appearances to the street. Structures with frontage on and near Pacific Avenue house single-family and multi-family residential uses and vary widely in height from 15 to 30 feet. A few taller, older buildings exist along the beach further west. The project will implement a natural orientation across Pacific Avenue toward the beach. After dedication of right-of way with which to widen Pacific Avenue, each of five proposed residential structures with frontage on this street will be set back approximately 7 feet. Building heights would terrace down to two and three stories, respecting the 35-foot building height limitation and heights of nearby residential units. With the proposed landscape, this edge of the proposed project is expected to offer some welcome visual relief from the narrow, confused and hard-edged visual character currently presented by the existing facilities on the project site and which typify this busy street.

The project site's visual relationship with Sunset Avenue and Thornton Place is tighter and more confined than in the instance of either Main Street or Pacific Avenue, due to the narrow widths of these streets. All uses and improvements along both streets are residential, and many of these improvements approach the respective property lines quite closely. These buildings are variously 15 to 30 feet in height on very narrow lots, some not wider than 25 feet. The project proposes a dedication of approximately 16 feet to widen Sunset Avenue and

landscaped setbacks of 5 to 15 feet along both streets to open the appearance of these narrow streets and create separation from the respective structures across them. Upon completion, project buildings will be 50 to 60 feet away from existing structures opposite Sunset Avenue and 25 to 50 feet from existing residences along Thornton Place. The proposed structures will be architecturally articulated, employ attractive materials and finishes, and effectively landscaped. However, with four residential levels, they are proposed at heights ranging from 40 to 50 feet, significantly higher than existing structures across Sunset Avenue or Thornton Place and appreciatively higher than the 35-foot height limitation recommended by the Specific Plan.

Implementation of the project would require Specific Plan Exceptions to regulations regarding building height and floor area ratio (FAR). Approvals of such exceptions are being sought as project actions. The exceptions would allow the project's taller buildings, up to approximately 56 feet in height, to exceed the 35-foot height limit currently in place on the project site and the project's overall FAR of 2.05:1 to exceed the Specific Plan limit of 1.5:1. The implication of these increases in building density and intensity from a land use perspective is analyzed in Section IV.G, Land Use, of this Draft EIR. That analysis concludes that the increases are consistent with plans and regulations for the project site, as the increases are consistent with policies and guidelines that encourage the provision of affordable housing through density bonuses.

Notwithstanding, for purposes of aesthetics it should be noted that the height and FAR regulations presented in the Specific Plan were placed in the Plan, in part, to limit potential aesthetic impacts. Allowing the greater heights and FAR would exercise a trade-off that is anticipated in the Plan, but would none-the-less facilitate the massing impacts cited above.

The thresholds section above identifies three significance thresholds regarding aesthetic character. They relate to impacts on natural open space or valued view resources, impacts on an area's valued aesthetic image, and impacts regarding inconsistencies with aesthetic regulations. The Sunset Avenue project would not exceed the significance threshold regarding the conversion of large areas of visible natural open space or valued visual resources, as the project site is a currently used, urbanized site with the existing transit uses and buildings.

However, the project would exceed the significance threshold related to the existing features that embody an area's valued aesthetic image. As described in the setting section above, the aesthetic image of the project area is mostly shaped by: (1) small-lot residential land use patterns organized along narrow streets, alleys, and walk streets in some of the areas immediately adjacent to the project site; and (2) by a complex composite of varied building sizes, forms and design styles in the larger vicinity. While the project's design would contribute to some sense of eclecticism in the larger area, and would include design and edge treatments to minimize impacts, the project would contrast with the surrounding areas; particularly the neighborhoods to

the south, west and north, primarily due to the greater building heights proposed. Most notably, the project would cause a contrasting transition in building heights across Sunset Avenue and Thornton Place. As such, the project would contrast with the existing features that embody the area's valued aesthetic image. Further, these impacts would occur due to project heights that exceed the limitations expressed in the Specific Plan. Therefore, impacts regarding aesthetic character would be significant.

Impacts on Views. As noted above, views of the project site from public vantages occur mainly from the public thoroughfares adjacent to the project site: Main Street and Pacific Avenue. Neither of these roadways is designated as a scenic highway, corridor or parkway. Existing views along both of these roadways is of the built, urban environment. The project site is neither a large natural area nor a valued view resource in its own right. In fact, as an aging transportation infrastructure facility, it may be characterized as quite the opposite. Further, as infill development, the project would continue the built development pattern between these roadways and would not affect views or viewsheds for travelers. Therefore, the project would not exceed the significance threshold regarding obstruction of valued views from a designated scenic highway, corridors or parkway.

Other views over the project site from private vantages are limited due to level terrain, intervening development, and low elevations of surrounding buildings from which views may be accessible. A few private locations that are elevated can see over the site to the urban setting beyond. Project impacts on views from private locations as may occur would be limited to a few locations and would be of a type that regularly occurs with infill development in an urban setting where one private party's "view" is through the buildable space of another private party's property.

In summary, the project site is not a notable view resource, and views over and through the site are limited. Therefore, the proposed project would not substantially alter views of a valued viewshed, the significance threshold. Impacts on views would be less than significant.

Further, the project's potential impact on views of coastal resources, per policies of the California Coastal Act, would not be adverse. The proposed project would exceed height limits described in the Venice Coastal Zone Specific Plan. However, it may be noted that view impacts associated with the Sunset Avenue Project would result from development of the first three levels, below the 35-foot height limit described in that Plan. No nearby dwelling units that can see over the project site enjoy viewing vantages with elevations exceeding 35 feet above the site's elevation datum point. The one view resource within the larger project vicinity is the Pacific Ocean. That resource lies outside of the project's viewshed, and the project would not obstruct existing views thereto from public thoroughfares or nearby uses. Therefore, the project

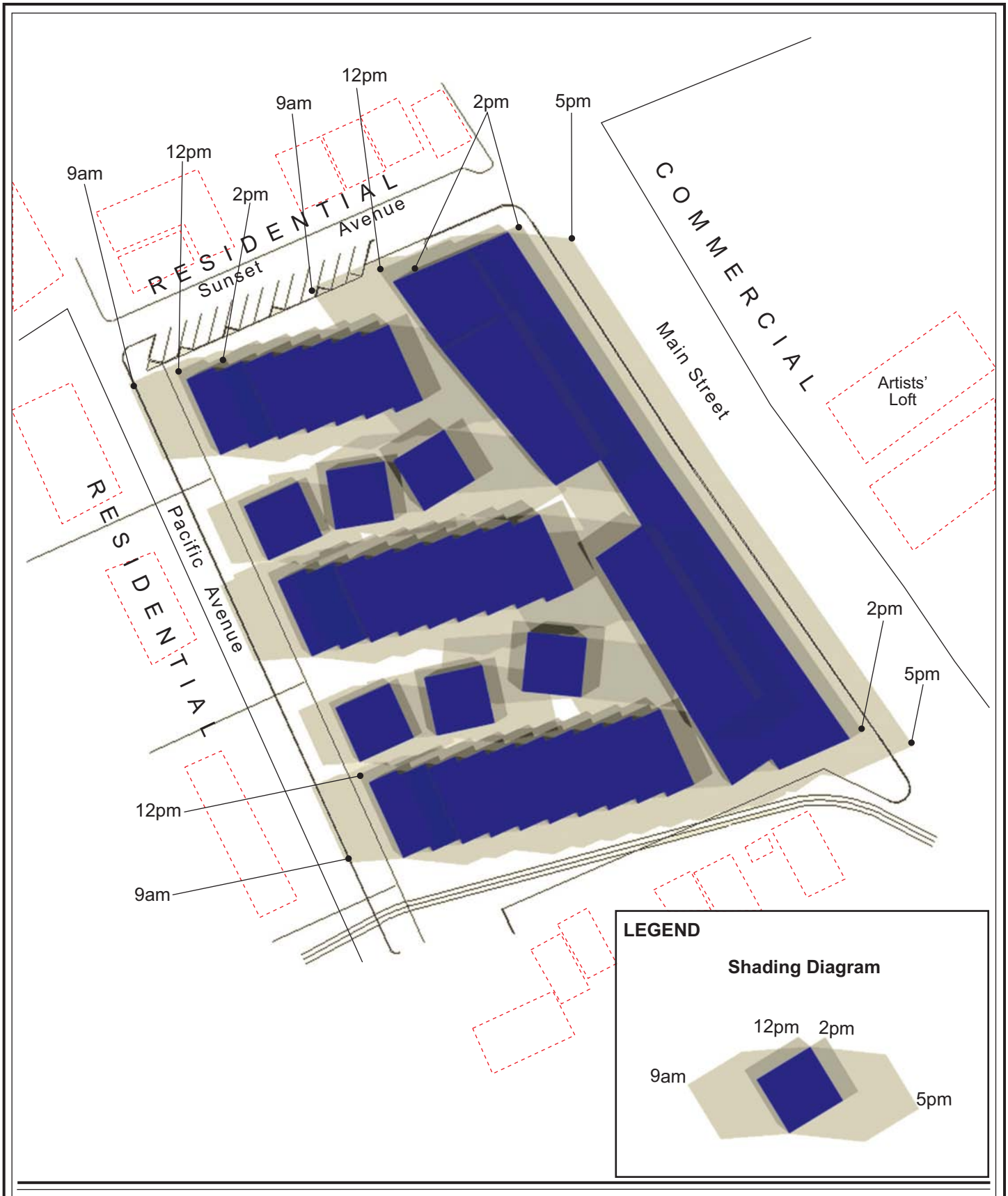
would be consistent with Section 30251 of the California Coastal Act that protects the scenic and visual qualities of the coastal zone.

Impacts on Illumination. The project site is currently illuminated during evening hours by relatively bright pole-mounted fixtures arrayed in toward the site's interior from locations near the periphery to support the existing bus parking and maintenance activities. The proposed project would have lighting that is similar to other residential and commercial uses in the vicinity. Project lighting would be directed on-site, broken up by multiple building masses, and illumination levels would be less than what currently exists on the project site. Lighting would conform to Municipal Code requirements regarding illumination impacts. The project's lighting would not substantially affect nighttime views, nor substantially illuminate adjacent, off-site, light-sensitive uses. The project would not use highly reflective materials that would cause unusual glare, and buildings would be fronted with landscaping that would further reduce potential glare. Illumination impacts would be less than significant.

Impacts on Shading. Shading is a common and expected quality in urban areas and it is often considered a beneficial feature of the environment when it provides cover from excess sunlight and heat. However, it can have an adverse impact if the blockage of direct sunlight substantially affects adjacent properties or when it interferes with the performance of sun related activities. While some incidental shading on sun-sensitive uses is commonly acceptable, shading impacts are typically considered substantial when they occur for large portions of the main daylight hours. The residential units surrounding the project site would be considered potentially shade-sensitive depending on their design and utilization of sun-light. No other shade-sensitive uses are located adjacent to the project site.

The shading analysis is based on an evaluation of the extent of shading from project structures on nearby sun-sensitive uses during the hours when daylight/sun-intensity is most prominent: the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time between late October and early April, and the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time between early April and late October. The extent of project shading for the summer solstice, fall equinox, winter solstice and spring equinox for the applicable time durations is shown in Figure IV.A-9 through Figure IV.A-12 on pages 120 through 123.

As indicated in Figure IV.A-9 through Figure IV.A-12, the proposed project would not cause any shading on residential uses along Pacific Avenue or Thornton Place during any of the times analyzed. Potential shading on the artists lofts units on Main Street would be limited. The greatest shading during the hours analyzed would occur on the winter solstice when shading would fall along the foot of the buildings for less than an hour. The greatest potential for shading would occur on the residential units along Sunset Avenue. Shading at the summer solstice and equinoxes would be non-existent and/or negligible. The greatest shading would



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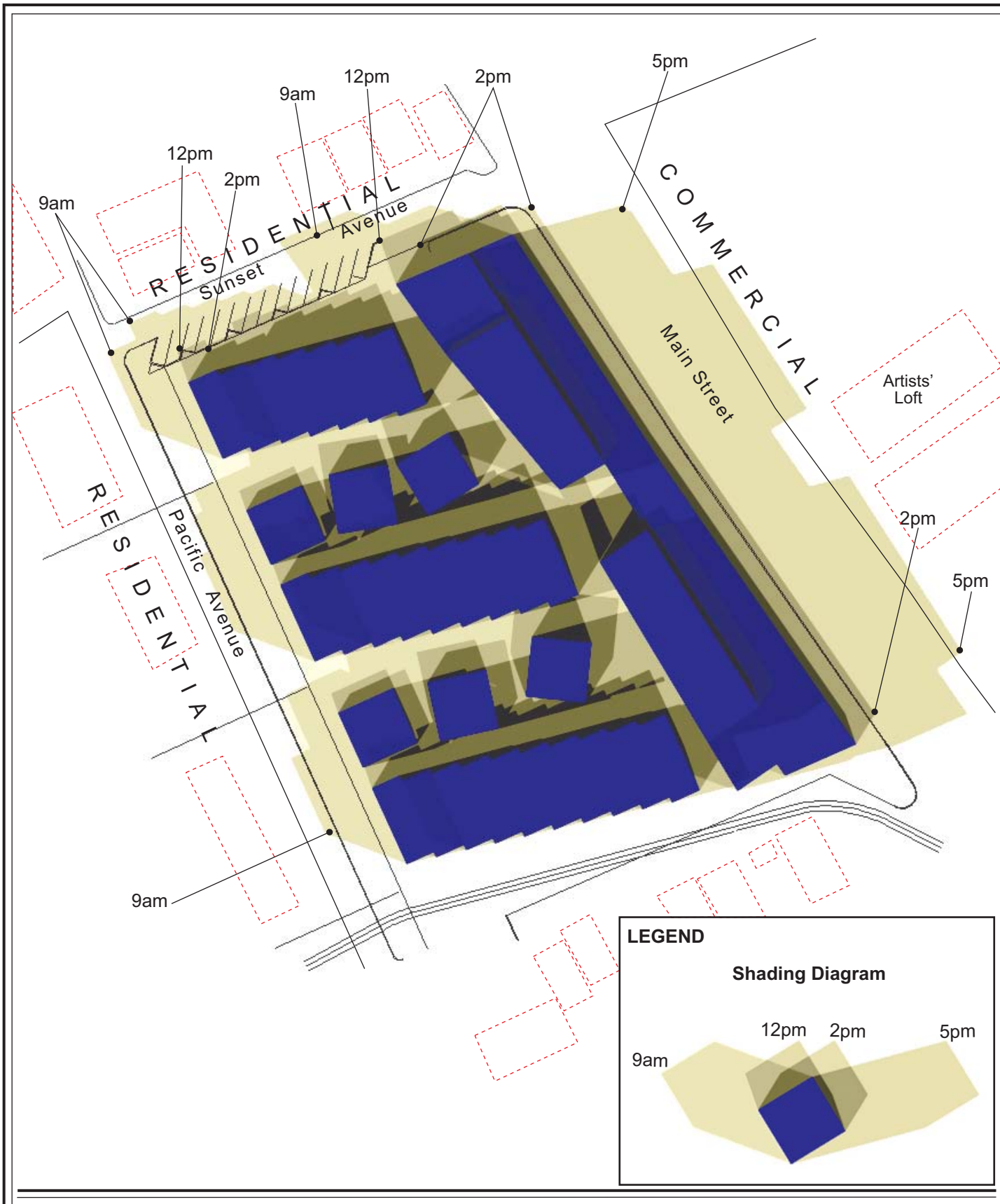
0 50 100 FEET

Source: PCR Services Corp., 2004

Figure IV.A-9
Sunset Avenue Project
Summer Shadows - June 21



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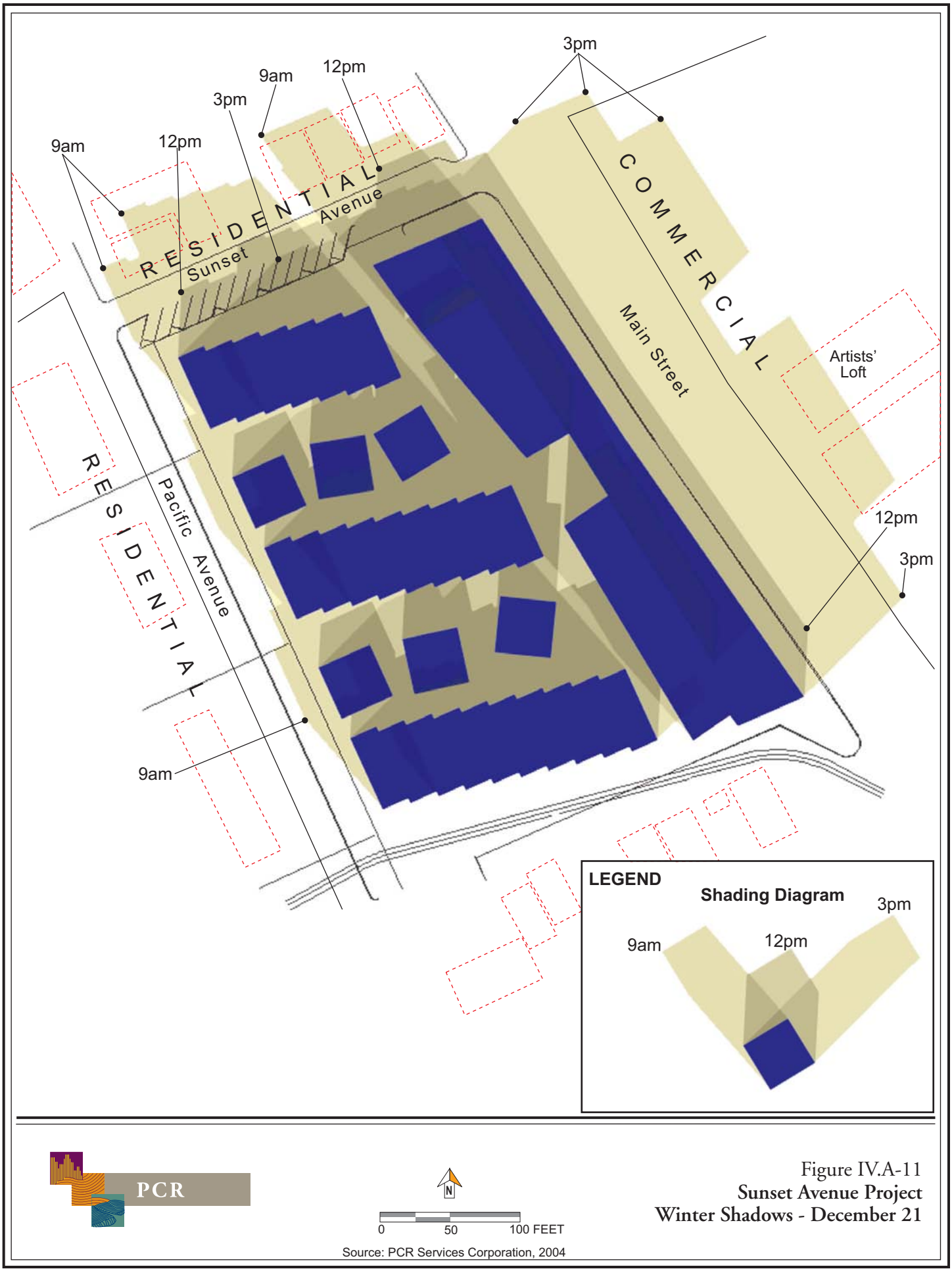
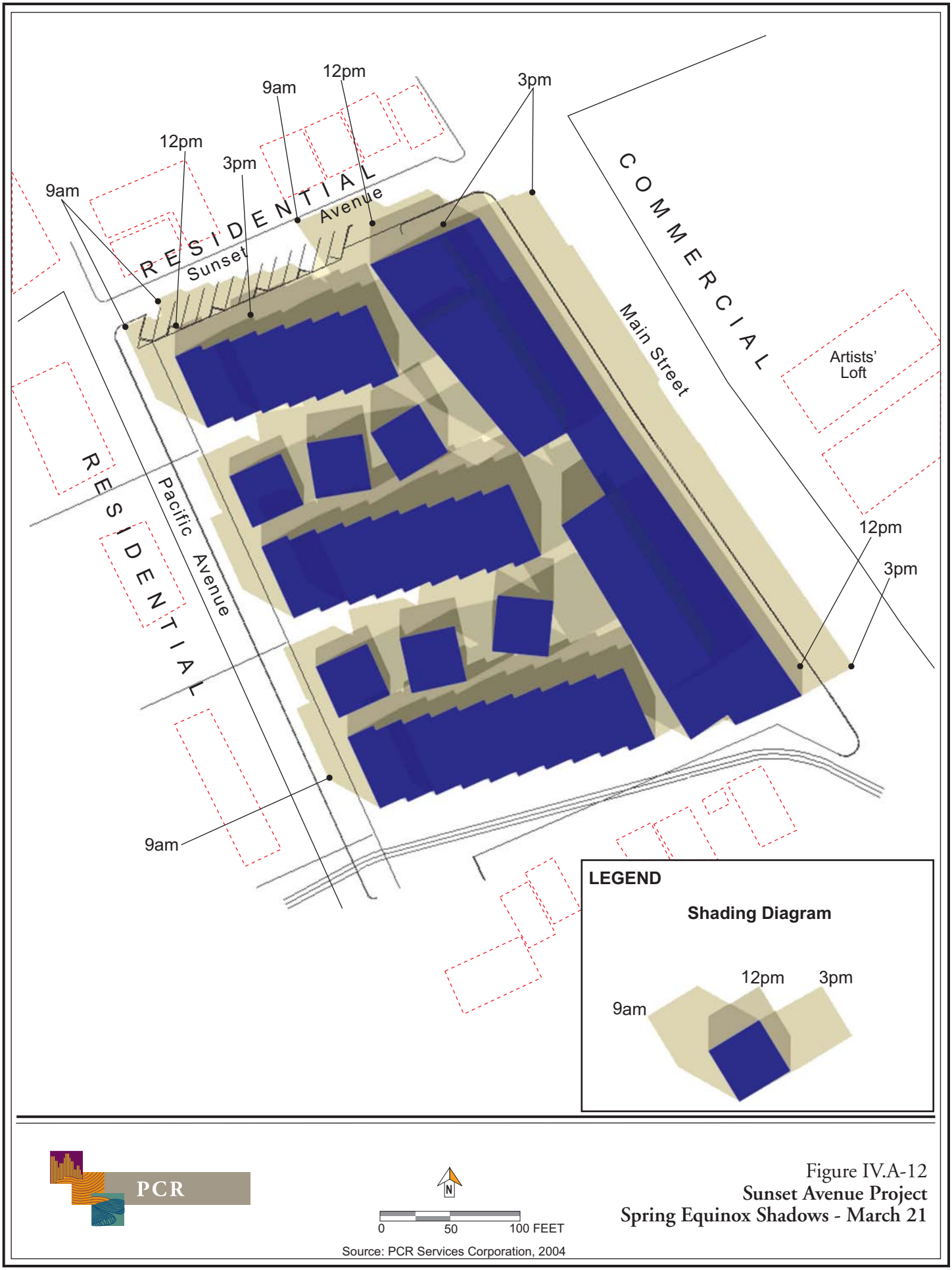
Source: PCR Services Corporation, 2004

Figure IV.A-10
Sunset Avenue Project
Fall Equinox Shadows - September 23



Source: PCR Services Corporation, 2004

Figure IV.A-11
Sunset Avenue Project
Winter Shadows - December 21



Source: PCR Services Corporation, 2004

Figure IV.A-12
Sunset Avenue Project
Spring Equinox Shadows - March 21

occur on the winter solstice. However, such shading would not occur on shade-sensitive receptors for more than three hours, which is the significance threshold for the period falling between late October and early April. It may be noted that the units along Sunset Avenue currently receive some shading from the tall trees located along Sunset Avenue, which are located closer to the units than the taller project buildings would be. Project impacts from shading would be less than significant.

(3) Combined Impacts

Each of the proposed projects is located in a different community within different viewsheds. Therefore, the two projects would have the effects reported for each individually, and would not contribute to a combined impact.

3. CUMULATIVE IMPACTS

None of the related projects is located in the immediate vicinity of the Transportation Facility site. The nearest are the small live/work building that would be an added in-fill to the light-industrial/commercial district on the western side of the Ballona Channel and the transit station that would be located at Jefferson Boulevard and La Cienega Avenue. Therefore, none of the related projects would contribute to a cumulative impact on aesthetics character, illumination, or shading. Further, none of the related projects would be within the viewshed from areas surrounding the project site; e.g., from along Jefferson Boulevard. To the extent that viewers in the Baldwin Hills have views over that portion of the urban basin in which the project is located, the related projects would blend into their disparate locations as in-fill projects and would not cause noticeable effects on those views. As impacts on aesthetics would be less than significant for the project, and related projects would not noticeably contribute to cumulative impacts, cumulative impacts on local aesthetics would be less than significant.

Only two of the related projects are located within the same viewshed as the Sunset Avenue Project. One of these projects, the Venice Artist Lofts, is opposite the proposed project across Main Street. The second project, a 35-unit condominium project is to be located immediately south of the Venice Artists Lofts. These related projects are in keeping with the uses and eclectic character of the area along and east of Main Street, as described in the analysis above. They contribute to the continuation of that character. The two projects would combine with the proposed project in shaping the general development character along Main Street as viewed by travelers along that thoroughfare, particularly as regards the appearance of new multi-family developments. The analysis of project impacts determined that a significant aesthetic impact, due to a substantial change in local visual character associated with proposed building heights, would occur. The conclusion was based on the proposed massing of project buildings

and their relationship to the surrounding community. The addition of the related projects does not contribute to the conclusion regarding project impacts alone, nor would they exacerbate those impacts. Nonetheless, since the project's impact is significant and the project is a component of the cumulative condition, the cumulative impact of the project, in conjunction with related projects, must be considered significant.

None of the related projects to either the West Los Angeles Transportation Facility or the Sunset Avenue Project would contribute to cumulative impacts on aesthetic resources, views, illumination, or shading.

4. MITIGATION MEASURES

West Los Angeles Transportation Facility.

This project has no significant adverse aesthetic impacts; therefore, no mitigation is required.

Sunset Avenue Project.

Mitigation Measure Sunset A-1: This project's significant adverse aesthetic impact due to substantially abrupt transition in building heights across Sunset Avenue and Thornton Place may be mitigated by reducing on-site building heights along these streets to conform to the 35-foot height limit prescribed by the Specific Plan. In considering the feasibility of this measure, the benefits of such mitigation should be weighed against this project's potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking. (This measure addresses impacts regarding building heights along Sunset Avenue and Thorton Place as discussed beginning on page 116 of this Section of the Draft EIR.)

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

West Los Angeles Transportation Facility.

This project would not cause adverse aesthetic impacts upon aesthetic resources, views, illumination, or shading.

Sunset Avenue Project.

This project would not cause significant view, illumination, or shading impacts upon surrounding properties. In addition, the identified significant impact upon aesthetic resources

associated with a portion of the project's building heights relative to adjoining properties can only be mitigated by reducing the height of the particular structures that cause this impact.

Combined Impacts

Each of the proposed projects is located in a different community within different viewsheds. Therefore, the two projects would have the effects reported for each individually, and would not contribute to a combined impact.

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
B. AIR QUALITY

1. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Regional Air Quality

Both project sites are located within the South Coast Air Basin (Basin), an approximately 6,600-square mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. Its terrain and geographical location determine this distinctive climate of the Basin, as the Basin is a coastal plain with connecting broad valleys and low hills.

The southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall and topography all affect the accumulation and/or dispersion of pollutants throughout the Basin making it an area of high pollution potential.

The greatest air pollution impacts throughout the Basin occur from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season and time of day. Ozone (O_3) concentrations, for example, tend to be lower along the coast, higher in the near inland valleys and lower in the far inland areas of the Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in southern California.

The SCAQMD has also published a Basin-wide air toxics study (MATES II, *Multiple Air Toxics Exposure Study*, March 2000). The MATES II study represents one of the most

comprehensive air toxics studies ever conducted in an urban environment. The study was aimed at determining the cancer risk from toxic air emissions throughout the Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to fully characterize health risks for those living in the Basin. The study concluded that the average carcinogenic risk in the Basin is approximately 1,400 in one million. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 70 percent of all risk is attributed to diesel particulate emissions, approximately 20 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde), and approximately 10 percent of all carcinogenic risk is attributed to stationary sources (which include industries and other certain businesses such as dry cleaners and chrome plating operations).

(2) Local Air Quality

(a) Existing Pollutant Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Basin and has divided the Basin into air monitoring areas or source receptor areas (SRA). Both project sites are located in the Northwest Los Angeles County Coastal Monitoring Area. The monitoring station for this area is the West Los Angeles Monitoring Station, which is located along Wilshire Boulevard at the Veteran's Hospital Complex, which is approximately 4 miles north-northeast of the Sunset Avenue site location, and approximately 5 miles west-northwest of the Jefferson Boulevard site location. Criteria pollutants monitored at the West Los Angeles Monitoring Station include O_3, carbon monoxide (CO), and nitrogen dioxide (NO_2). The closest monitoring station that monitors particulate matter less than ten microns in diameter (PM_{10}) and sulfur dioxide (SO_2) is the Hawthorne Monitoring Station, located at 2534 West 120th Street in the City of Hawthorne. It is located approximately 10 miles southeast of the Sunset Avenue project site location and 8 miles south-southeast of the Jefferson Boulevard project site location. The most recent data available from these monitoring stations encompassed the years 1999 to 2003. The monitoring data, provided in Table IV.B-1 on page 129, shows the following pollutant trends:

Ozone (O_3) – The maximum one-hour ozone concentration recorded during the reporting period was 0.13 ppm (2003). During this reporting period, the California standard of 0.09 ppm was exceeded between one and eleven times annually. The National standard of 0.12 ppm was exceeded between zero and one time during the five-year reporting period, with the only exceedance in 2003. The maximum eight-hour ozone concentration recorded during the reporting period was 0.10 ppm in 2003. During this reporting period, the National standard of 0.08 ppm was exceeded one time in 2003.

Table IV.B-1

POLLUTANT STANDARDS AND AMBIENT AIR QUALITY DATA FROM THE WEST LOS ANGELES AND CENTRAL LOS ANGELES MONITORING STATIONS

Pollutant/Standard	1999	2000	2001	2002	2003
Ozone (O_3)					
O_3 (1-hour)					
Maximum Concentration (ppm)	0.12	0.10	0.10	0.12	0.13
Days > CAAQS (0.09 ppm)	4	2	1	1	11
Days > NAAQS (0.12 ppm)	0	0	0	0	1
O_3 (8-hour)					
Maximum Concentration (ppm)	0.08	0.08	0.08	0.08	0.10
Days > NAAQS (0.08 ppm)	0	0	0	0	1
Particulate Matter (PM_{10})					
PM_{10} (24-hour)					
Maximum Concentration	88	80	97	65	81
Calculated Days > CAAQS (50 $\mu g/m^3$)	19	15	20	8	4
Calculated Days > NAAQS (150 $\mu g/m^3$)	0	0	0	0	0
PM_{10} (Annual Average)					
Annual Arithmetic Mean (50 $\mu g/m^3$)	45	40	44	39	N/A
Annual Geometric Mean (20 $\mu g/m^3$)	42	37	40	38	N/A
Particulate Matter ($PM_{2.5}$) [a]					
$PM_{2.5}$ (24-hour)					
Maximum Concentration ($\mu g/m^3$)	69	88	73	66	70
Calculated Days > NAAQS (65 $\mu g/m^3$)	2	11	4	1	2
$PM_{2.5}$ (Annual)					
Annual Arithmetic Mean (15 $\mu g/m^3$)	23	22	23	22	N/A
Carbon Monoxide (CO)					
CO (1-hour)					
Maximum Concentration (ppm)	6	6	4	5	N/A
Days > CAAQS (20 ppm)	0	0	0	0	N/A
Days > NAAQS (35 ppm)	0	0	0	0	N/A
CO (8-hour)					
Maximum Concentration (ppm)	3.8	4.3	3.0	2.7	2.8
Days > CAAQS (9.0 ppm)	0	0	0	0	0
Days > NAAQS (9 ppm)	0	0	0	0	0

Table IV.B-1 (Continued)

POLLUTANT STANDARDS AND AMBIENT AIR QUALITY DATA FROM THE WEST LOS ANGELES AND CENTRAL LOS ANGELES MONITORING STATIONS

Pollutant/Standard	1999	2000	2001	2002	2003
Nitrogen Dioxide (NO_2)					
NO_2 (1-hour)					
Maximum Concentration (ppm)	0.13	0.16	0.11	0.11	0.12
Days > CAAQS (0.25 ppm)	0	0	0	0	0
Annual Arithmetic Mean (0.05 ppm)	0.03	0.04	0.03	0.02	0.02
Sulfur Dioxide (SO_2)					
SO_2 (1-hour)					
Maximum Concentration (ppm)	0.05	0.08	0.08	0.08	0.06
Days > CAAQS (0.25 ppm)	0	0	0	0	0
SO_2 (24-hour)					
Maximum Concentration (ppm)	0.01	0.01	0.01	0.02	N/A
Days > CAAQS (0.04 ppm)	0	0	0	0	N/A
Days > NAAQS (0.14 ppm)	0	0	0	0	N/A
SO_2 (Annual)					
Annual Arithmetic Mean (0.03 ppm)	0.002	0.001	N/A	N/A	N/A

Ambient data for airborne lead is not included in this table since the Basin is currently in compliance with state and national standards for lead.

ppm = parts per million *AAM = Annual Arithmetic Mean*
$\mu g/m^3$ = micrograms per cubic meter *N/A = not available*

[a] *Data for this pollutant is not monitored at neither the West Los Angeles stations and is, therefore, recorded from the nearest, most representative Station (Los Angeles North Main).*

Sources: South Coast Air Quality Management District, Air Quality Data 1999-2003; California Air Resources Board, Air Quality Data 1999-2003.

Carbon Monoxide (CO) – The highest 1-hour CO concentration was 6 ppm, recorded in 1999 and 2000. The highest recorded eight-hour CO concentration was 4.3 ppm, recorded in 2000. The California standard of 9.0 ppm and the national standard of 9 ppm were not exceeded during the reporting period.

Nitrogen Dioxide (NO_2) – The highest recorded 1-hour concentration of NO_2 during the reporting period was 0.16 ppm (2000) and the highest recorded annual arithmetic mean during the reporting period was 0.04 ppm (2000). Neither the California nor National NO_2 standard was exceeded during the reporting period.

Sulfur Dioxide (SO_2) – The highest 1-hour concentration was 0.08 ppm from 2000 to 2002. The highest recorded 24-hour concentration was 0.02 ppm in 2002. No violations of the California or National SO_2 standards were recorded during this reporting period. The highest annual arithmetic mean recorded was 0.002 ppm in 1999.

Particulate Matter (PM_{10}) – The highest recorded 24-hour concentration during the reporting period was 97 micrograms per cubic meter ($\mu g/m^3$) of air particulates (2001). During this reporting period, the California PM_{10} standard was calculated to exceed the standard between 4 and 20 times annually, with the highest number of exceedances in 2001. No exceedances of the National standard occurred between 1999 and 2003. The highest annual arithmetic mean recorded was 45 $\mu g/m^3$ in 1999.

Fine Particulates ($PM_{2.5}$) – The highest recorded 24-hour concentration during the reporting period was 88 micrograms per cubic meter ($\mu g/m^3$) of $PM_{2.5}$ (2000). During these four years the National standard was exceeded between one and eleven times annually. The highest annual arithmetic mean recorded was 23 $\mu g/m^3$ in 1999 and 2001.

(b) Existing Health Risk in the Surrounding Area

According to the SCAQMD's MATES-II study, the project areas are within a cancer risk zone of approximately 600 to 1,000 in one million, which is largely due to diesel particulate generated from mobile sources. In comparison, the average cancer risk in the Basin as a whole is approximately 1,400 per million.

(c) Sensitive Receptor Locations

Some population groups, such as children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases, are considered more sensitive to air pollution than others. A description of such sensitive receptors within the vicinity of each of the project sites is provided below.

West Los Angeles Transportation Facility Site. With respect to the West Los Angeles Transportation Facility (Transportation Facility) site location, there are no land uses within the immediate vicinity that are considered sensitive to air pollution. The site is surrounded by commercial and light industrial uses to the north, south, and east; and Jefferson Boulevard, Ballona Creek and additional industrial development to the west. The nearest park in the vicinity of the Transportation Facility site is located approximately 750 feet to the north/northwest. The nearest residential uses within the vicinity of the Transportation Facility site include the Cameo Woods Condominium property located at the south east corner of Rodeo Road and Lenawee

Avenue approximately 800 feet to the south/south east of the site and the Blair Hills residential community located south of Rodeo Road approximately 2,500 feet from the site. There are also residential uses located over 1,000 feet east of the Transportation Facility site, across La Cienega Boulevard. Sensitive receptor locations in the vicinity of the Transportation Facility site are shown in Figure IV.B-1 on page 133.

Sunset Avenue Site. The Sunset Avenue site is generally surrounded by residential uses with the exception of a commercial parking lot across Main Street to the east. Residences are currently located immediately north of Sunset Avenue, south of Thornton Place, and west of Pacific Avenue. There is also a new residential development currently under construction located approximately 150 feet east of the project site across Main Street and along Hampton Drive. Sensitive receptor locations present in the vicinity of the Sunset Avenue site are shown in Figure IV.B-2 on page 134.

b. Regulatory Framework

In response to longstanding concerns about air pollution, federal, state, and local authorities have adopted various rules and regulations requiring evaluation of the potential air quality impacts of a proposed project and appropriate mitigation to reduce air emissions. A number of plans and policies have been adopted by various agencies that address air quality concerns. Those plans and policies that are relevant to the project are discussed below.

(1) Federal Clean Air Act

The Federal Clean Air Act (CAA) is a comprehensive Federal law that regulates air emissions from area, stationary, and mobile sources. This law authorizes the United States Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and the environment. The CAA was passed in 1963, and has since undergone five major amendment cycles. The latest major amendment cycle was completed in 1990, with prior major amendment cycles having occurred in 1965, 1967, 1970, and 1977.

The USEPA utilizes six "criteria pollutants" as indicators of air quality, and has established for each of them a maximum concentration (i.e., NAAQS) above which adverse effects on human health may occur. These six criteria pollutants are CO, O_3, SO_2, NO_2, particulates (PM_{10} and $PM_{2.5}$), and lead (Pb). The CAA specifies future dates for achieving compliance with the NAAQS and mandates that states submit and implement a State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met.

LEGEND

Sensitive Receptor Location

Project Site

PCR

Figure IV.B-1
West Los Angeles Transportation Facility
Sensitive Receptor Locations

Source: Landiscor, 2004

LEGEND

Sensitive Receptor Location

Project Site

PCR

Figure IV.B-2
Sunset Avenue Project
Sensitive Receptor Locations

Source: Landiscor, 2004

Both project sites are located within the Basin, which is currently designated as a "non-attainment" area for three criteria pollutants: CO, O_3, and PM_{10}.[37] Non-attainment designations are categorized into seven levels of severity based on projected attainment date and level of concentration above the standard including: basic, marginal, moderate, serious, severe-15, severe-17, and extreme. The Basin is classified as "extreme" for the 1-hour O_3 standard, "severe-17" for the 8-hour O_3 standard, and "serious" for PM_{10}. No official determination has been made regarding the attainment status of the new ozone and $PM_{2.5}$ standards.[38] However, selected monitoring stations have already begun analyzing air samples for $PM_{2.5}$.

(2) California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS incorporate additional standards for most of the criteria pollutants and has set standards for other pollutants recognized by the State. In general, the California standards are more health protective than NAAQS. California has also set standards for $PM_{2.5}$, sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The Basin does meet the California standards for sulfates, hydrogen sulfide and vinyl chloride, but does not meet the California standard for visibility. Table IV.B-2 on pages 136 through 137 details the NAAQS and CAAQS that currently in effect for each air pollutants list, while Table IV.B-3 on page 138 provides the Basin's attainment status with respect to federal and State standards.

(3) South Coast Air Quality Management District (SCAQMD)

The SCAQMD has been established as the local air pollution control agency in the Basin. The SCAQMD has jurisdiction over an area of approximately 10,743 square miles, consisting of the four-county Basin which includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and the Riverside County portions of the Salton Sea Air Basin and Mojave Desert Air Basin. While air quality in this area has improved, the Basin requires continued diligence to meet air quality standards.

The SCAQMD has adopted a series of Air Quality Management Plans (AQMP) to meet the CAAQS and NAAQS. These plans require, among other emissions-reducing activities,

[37] *The Basin technically met the CO standards for attainment in 2002, but the Basin's official attainment status has not been reclassified by the USEPA.*

[38] *These standards were promulgated in July 1997, but enforcement measures have been postponed due to significant technical difficulties in calculating emissions of $PM_{2.5}$ and related precursors.*

Table IV.B-2

AMBIENT AIR QUALITY STANDARDS[a]

Pollutant	Averaging Time	California Standard[b]	Federal Primary Standard[b]	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone (O_3)[c]	1 hour	0.09 ppm	0.12 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Motor vehicles.
	8 hours	—	0.08 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, CO interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	—	0.05 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.25 ppm			
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	—	0.03 ppm	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm			
	24 hours	0.04 ppm	0.14 ppm		
Particulate Matter (PM_{10})	Annual Geometric Mean	20 $\mu g/m^3$	—	May irritate eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 Hours	50 $\mu g/m^3$	150 $\mu g/m^3$		
	Annual Arithmetic Mean	—	50 $\mu g/m^3$		
Particulate Matter ($PM_{2.5}$)[d]	Annual Geometric Mean	12 $\mu g/m^3$	15 $\mu g/m^3$	Increases respiratory disease, lung damage, cancer, premature death; reduced visibility; surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, NO_X, SO_X, organics).
	24 Hours	—	65 $\mu g/m^3$		

Table IV.B-2 (Continued)

AMBIENT AIR QUALITY STANDARDS[a]

Pollutant	Averaging Time	California Standard[b]	Federal Primary Standard[b]	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Lead	Monthly	1.5 μg/m^3	—	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurologic dysfunction (in severe cases).	Lead smelters, battery manufacturing & recycling facilities.
	Quarterly	—	1.5 μg/m^3		
Sulfates (SO_4)	24 hours	25 μg/m^3	—	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Coal or oil burning power plants and industries, refineries, diesel engines.

[a] *Ambient air quality standards are set at levels which provide a reasonable margin of safety and protect the health of the most sensitive individual in the population.*

[b] *ppm = parts per million and μg/m^3 = micrograms per cubic meter.*

[c] *Ozone is formed when NO_X and ROC react in the presence of sunlight. There are no air quality standards for ROC. However, ROC is recognized as a pollutant of concern as it is a precursor to the formation of ozone.*

[d] *A Federal air quality standard for $PM_{2.5}$ was adopted in 1997. Presently, no methodologies for determining impacts relating to $PM_{2.5}$ have been developed. In addition, no strategies or mitigation programs for this pollutant have been developed or adopted by federal, state, or regional agencies.*

Source: California Air Resources Board, Ambient Air Quality Standards, 2004; and the USEPA, 2004.

control technology for existing sources; control programs for area sources and indirect sources; a SCAQMD permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions; transportation control measures; sufficient control strategies to achieve a 5 percent or more annual reduction in emissions (or 15 percent or more in a three-year period) for Reactive Organic Compounds (ROC), NO_X, CO, and PM_{10}; and demonstration of compliance with the California Air Resources Board's established reporting periods for compliance with air quality goals.

The SCAQMD adopted a comprehensive AQMP update, the 2003 Air Quality Management Plan for the South Coast Air Basin, on August 1, 2003 (2003 AQMP).[39] The 2003 AQMP outlines the air pollution control measures needed to meet federal health-based standards

[39] *South Coast Air Quality Management District, AQMD web site, www.aqmd.gov/news1/aqmp_adopt.htm.*

Table IV.B-3

SOUTH COAST AIR BASIN ATTAINMENT STATUS

Pollutant	National Standards	California Standards
Ozone (O_3) (1-hour standard)	Extreme	Non-attainment
Ozone (O_3) (8-hour standard)	Severe-17	N/A
Carbon Monoxide (CO)	Serious [a]	Non-attainment [a]
Sulfur Dioxide (SO_2)	Attainment [b]	Attainment [b]
Nitrogen Dioxide (NO_2)	Attainment [b]	Attainment [b]
PM_{10}	Serious	Non-attainment
$PM_{2.5}$	Pending [c]	N/A
Lead (Pb)	Attainment [b]	Attainment [b]

[a] *The Basin has technically met the CO standards for attainment since 2002, but the official status has not been reclassified by the USEPA..*

[b] *An air basin is designated as being in attainment for a pollutant if the standard for that pollutant was not violated at any site in that air basin during a three year period.*

[c] *Attainment status with the $PM_{2.5}$ standard has not yet been determined.*

Source: USEPA Region 9 and California Air Resources Board, 2004.

for O_3 by 2010, and for PM_{10} by 2006. It also demonstrates how the federal standard for CO, achieved for the first time at the end of 2002, will be maintained.[40] This revision to the AQMP also addresses several state and federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes and new air quality modeling tools. The 2003 AQMP is consistent with and builds upon the approaches taken in the 1997 AQMP and the 1999 Amendments to the Ozone SIP for the South Coast Air Basin for the attainment of the federal ozone air quality standard.[41] Lastly, the plan takes a preliminary look at what will be needed to achieve new and more stringent health standards for O_3 and $PM_{2.5}$.

The SCAQMD adopts rules and regulations to implement portions of the AQMP. Several of these rules may apply to construction or operation of the project. For example, Rule 403 requires the implementation of best available fugitive dust control measures during active operations capable of generating fugitive dust emissions from onsite earth-moving activities, construction/ demolition activities, and construction equipment travel on paved and unpaved roads. Specific control requirements set forth within Rule 403 are included in Appendix B-1 to this EIR.

[40] *The Basin technically met the CO standards for attainment in 2002, but the Basin's official attainment status has not been reclassified by the USEPA.*

[41] *Until the 2003 AQMP is officially approved by the USEPA, the 1997 AQMP and the 1999 Amendments to the Ozone SIP will remain in effect.*

The SCAQMD has published a handbook (*CEQA Air Quality Handbook*, November 1993) (SCAQMD *CEQA Handbook*) that is intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. This handbook provides standards, methodologies and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. In addition, the SCAQMD has published a guidance document (*Localized Significance Threshold Methodology for CEQA Evaluations*, June 2003) (SCAQMD LST Guidance Document) that is intended to provide guidance in evaluating localized effects from mass emissions during construction. This document was also used in the preparation of this analysis.

(4) Regional Comprehensive Plan and Guide

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated metropolitan planning organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. With respect to air quality planning, SCAG has prepared the *Regional Comprehensive Plan and Guide* (*RCPG*) for the SCAG region, which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation components of the AQMP and are utilized in the preparation of air quality forecasts and the consistency analysis that is included in the AQMP.

2. ENVIRONMENTAL IMPACTS

a. Methodology

Construction. Mass daily emissions during construction were compiled using URBEMIS 2002, which is an emissions estimation/evaluation model developed by the CARB that is based, in part, on SCAQMD CEQA Air Quality Handbook guidelines and methodologies. The URBEMIS 2002 model separates the construction process into three phases. The first phase is building demolition with emissions resulting from demolition dust, debris haul truck trips, equipment exhaust, and worker commute exhaust. The second phase of construction is site grading with emissions resulting from fugitive dust, soil haul truck trips, equipment exhaust, and worker commute exhaust. The third phase is subdivided into building equipment, architectural coating, asphalt, and worker commute. Emissions from the third phase of construction include equipment exhaust from building construction and asphalt paving, ROC emissions from architectural coating and asphalt paving, and worker commute exhaust. The localized effects from the on-site portion of mass daily emissions were evaluated using procedures outlined in the

SCAQMD LST Guidance Document. A complete listing of the construction equipment by phase and construction phase duration assumptions used in this analysis is included within the URBEMIS 2002 printout sheets that are provided in Appendix B (Air Quality) of this EIR.

Operation. The URBEMIS 2002 software was also used to compile the mass daily emissions estimates from mobile- and area-sources that would occur during long-term project operations. In calculating mobile-source emissions, the URBEMIS 2002 default trip length assumptions were applied to the average daily trip (ADT) estimates provided by the project traffic consultant to arrive at vehicle miles traveled (VMT). Stationary-source emissions were compiled using procedures outlined in the SCAQMD CEQA Handbook. Localized CO concentrations were evaluated using the CALINE4 microscale dispersion model, developed by Caltrans, in combination with EMFAC 2002 emission factors. All emissions calculation worksheets and air quality modeling output files are provided in Appendix B of this EIR.

b. Thresholds of Significance

(1) Construction Emissions

The following factors are set forth in the City of Los Angeles *L.A. CEQA Thresholds Guide*, for consideration on a case-by-case basis for evaluation of significance:

Combustion Emissions from Construction Equipment

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

Fugitive Dust

Grading, Excavation and Hauling:

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation and hauling activities;

- Type and number of pieces of equipment to be used; and
- Projected haul route.

Heavy-Duty Equipment Travel on Unpaved Roads:

- Length and type of road;
- Type, number of pieces, weight and usage of equipment; and
- Type of soil.

Other Mobile Source Emissions

- Number and average length of construction worker trips to project site, per day; and
- Duration of construction activities.

While these factors are important inputs in determining the amounts and nature of air pollution emissions generated by a project during construction, they do not constitute a threshold to which the resultant emissions may be compared for purposes of determining significance. Therefore, the following thresholds from the SCAQMD will be utilized. The project would have a significant impact from construction activities if:

- ☐ Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for ROC; (2) 100 pounds per day for NO_X; (3) 550 pounds per day for CO; and (4) 150 pounds per day for PM_{10} or SO_X.[42]
- ☐ Project-related fugitive dust and construction equipment combustion emissions cause an incremental increase in localized PM_{10} concentrations of 10.4 $\mu g/m^3$ at a sensitive receptor location or cause NO_2 or CO concentrations to exceed their respective AAQS at a sensitive receptor location.[43]

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[42] *South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), 1993.*

[43] *While the SCAQMD CEQA Air Quality Handbook (1993), does not provide any localized thresholds, the SCAQMD currently recommends localized significance thresholds (LST) for PM_{10}, NO_2, and CO in its draft document titled "SCAQMD Localized Significance Threshold Methodology for CEQA Evaluations (SCAQMD LST Guidelines)," June 19, 2003. Although recommended by the SCAQMD, currently, the use of LSTs for purposes of impact evaluation is voluntary.*

- The Project creates objectionable odors.

(2) Operational Emissions

Thresholds of significance regarding operational emissions are set forth in the City of Los Angeles' *L.A. CEQA Thresholds Guide*, which states that a project would normally have a significant impact on air quality from project operations if any of the following would occur:

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the daily thresholds presented below:[44]

Pollutant	Significance Threshold (lbs./day)
ROG	55
NO_X	55
CO	550
PM_{10}	150
SO_X	150

- Either of the following conditions would occur at an intersection or roadway within 0.25 mile of a sensitive receptor:

  – The project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or

  – The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

- The project creates an objectionable odor at the nearest sensitive receptor.

These thresholds will be applied to the project.

In addition to the above thresholds established by the City, the SCAQMD has established the following thresholds by which to determine whether a project would have a significant operational air quality impact:

[44] *South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), 1993.*

- ☐ The project would not be compatible with SCAQMD and SCAG air quality policies if it:
  - causes an increase in the frequency or severity of existing air quality violations;
  - causes or contributes to new air quality violations;
  - delays timely attainment of air quality standards or the interim emission reductions specified in the AQMP; or
  - exceeds the assumptions (e.g., population, housing and employment growth) utilized in the SCAQMD's AQMP.

(3) Toxic Air Contaminants

The following factors are set forth in the City of Los Angeles' *L.A. CEQA Thresholds Guide*, for consideration on a case-by-case basis in making a determination of significance:

- The regulatory framework for the toxic material(s) and process(es) involved;
- The proximity of the toxic air contaminants to sensitive receptors;
- The quantity, volume and toxicity of the contaminants expected to be emitted;
- The likelihood and potential level of exposure; and
- The degree to which project design will reduce the risk of exposure.

Under significance thresholds that are based on these factors, the project would have a significant toxic air contaminant impact, if:

- ☐ On-site stationary sources emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million or an acute or chronic hazard index of 1.0.[45]
- ☐ Hazardous materials associated with on-site stationary sources result in an accidental release of air toxic emissions or acutely hazardous materials posing a threat to public health and safety.

[45] *SCAQMD Risk Assessment Procedures for Rules 1401 and 212, November 1998.*

The Project would be occupied primarily by sensitive individuals within a quarter mile of any existing facility that emits air toxic contaminants which could result in a health risk for pollutants identified in District Rule 1401.[46]

c. Analysis of Project Impacts

(1) West Los Angeles Transportation Facility

Construction Period

Regional Mass Emissions. With regard to the Transportation Facility site, the three structures that currently occupy the site, which total approximately 9,000 sq.ft., would be demolished and replaced with a new fleet transportation facility for up to 175 buses. Construction activities are anticipated to begin in March of 2005 and conclude by June 2006. Emissions would vary from day to day, depending on the level of activity, the specific type of construction activity occurring and, for fugitive dust, the prevailing weather conditions. For example, fugitive dust emissions would occur primarily during the demolition of existing structures and soil disturbance (e.g., finish grading and equipment travel over unpaved surfaces) activities. Mobile emissions, especially NO_X, would occur primarily during heavy-use periods of diesel powered equipment such as bulldozers, graders, and haul trucks. Mobile source emissions would also result from vehicle trips by construction workers to and from the project site. ROC emissions would be released primarily during the application of architectural coatings (e.g., paints) and asphalt paving.

A conservative estimate of the project's construction-period mass regional emissions is presented in Table IV.B-4 on page 145. As shown therein, the estimate of worst-case maximum emissions during construction would exceed the SCAQMD daily significance threshold for NO_X while mass daily emissions for ROC, CO, SO_X, and PM_{10} would remain below their respective significance thresholds. As such, impacts related to construction-period NO_X mass daily regional emissions would be significant without incorporation of mitigation.

[46] *SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), April 1993.*

Table IV.B-4

WEST LOS ANGELES TRANSPORTATION CENTER FACILITY
ESTIMATE OF WORST-CASE EMISSIONS DURING CONSTRUCTION
(pounds per day)

	ROC [a]	NO_X	CO	SO_X	PM_{10} [b]
Demolition					
On-Site	33	44	36	0	6
Off-Site	2	41	8	1	1
Total	35	85	44	1	7
Site Preparation					
On-Site	34	39	44	0	12
Off-Site	3	62	13	1	2
Total	37	101	57	1	14
Building Erection/Finishing					
On-Site	45	58	58	0	3
Off-Site	0	0	3	0	0
Total	45	58	61	0	3
Worst-Case On-Site Total	**45**	**58**	**58**	**0**	**12**
Localized Significance Threshold [c]	—	249	3,502	—	181
Over (Under) Threshold	**—**	**(191)**	**(3,444)**	**—**	**(169)**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**
Worst-Case Emissions Total	**45**	**101**	**61**	**1**	**14**
Regional Significance Threshold	75	100	550	150	150
Over (Under) Threshold	**(30)**	**1**	**(489)**	**(149)**	**(136)**
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**

[a] *The on-site ROC emissions estimates for demolition and site preparation have been increased by 28 pounds per day to account for potential soils-release ROC emissions that may occur during these activities (EPA, Estimating Air Emissions from Petroleum UST Cleanups, 1989).*

[b] *PM_{10} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the site boundaries. A copy of SCAQMD Rule 403 is included in the Air Quality Appendix.*

[c] *The project site is located in SCAQMD Source Receptor Area (SRA) No. 2. These LSTs are based on the site location SRA, distance to nearest sensitive receptor location from the project site (200 meters), and project area that could be under construction on any given day (five acres). Although recommended by the SCAQMD, currently, the use of LSTs for purposes of impact evaluation is voluntary.*

Source: PCR Services Corporation, 2004. Construction emission calculation worksheets are included in Appendix B-2 to this EIR.

Local Area Concentrations. The SCAQMD has developed a set of mass emissions rate look-up tables that can be used to evaluate localized impacts that may result from construction-period emissions. If the on-site emissions from proposed construction activities are below the Localized Significance Thresholds (LST) emission levels found in the LST mass rate look-up

tables for the project site's Source Receptor Area (SRA), then project emissions would not have potential to cause a significant localized air quality impact.

As discussed previously, mass daily emissions during construction were compiled using the URBEMIS 2002 emissions inventory model. However, only on-site construction emissions were considered for purposes of comparison with the LST mass rate look-up tables (i.e., consistent with SCAQMD LST Guidelines off-site delivery/haul truck activity and employee trips were not considered in the evaluation of localized impacts. A conservative estimate of the project's construction-period on-site mass emissions is presented in Table IV.B-4. As shown therein, the worst-case maximum emissions for all criteria pollutants would remain below their respective SCAQMD LST significance threshold. As such, localized impacts that may result from construction-period air pollutant emissions would be less than significant.

Air Toxic Impacts. As discussed in Section IV.E. (Hazardous Materials) of this EIR, the proposed Transportation Facility site has been used for light industrial purposes since 1952, and as such, results of the soil samples revealed that the site showed evidence of contamination from acetone, total recoverable petroleum hydrocarbon (TRPHs), gasoline-range total recoverable petroleum hydrocarbon, and fuel oxygenates. Therefore, during site grading activities and the removal of building foundations and asphalt pavement, there is a potential for small amounts of ROC and related toxic air contaminants (TAC) emissions to be released into the environment. As such, any remediation activities would be subject to SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) requirements. Among other requirements, up-wind and down-wind monitors would be used to ensure that potential toxic air concentrations remain within SCAQMD permitted levels. Complete Rule 1166 requirements are provided in Appendix B-1 to this EIR.

The greatest potential TAC emissions at the Transportation Facility site would be related to diesel particulate emissions associated with heavy equipment operations during grading activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively short-term construction schedule of 13 months, the project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions and corresponding individual cancer risk and, therefore, project-related toxic emission impacts during construction would not be significant.

Operations Period

Regional Mass Emissions. The relocation of the Division 6 operations and maintenance facility in Venice to the West Los Angeles Transportation Facility site, in and of itself, would

have no effect on existing bus routes or scheduling, the number of Metro employees, or Metro's on-going bus fleet transition from diesel-fueled to compressed natural gas (CNG)-fueled buses. As such, project development would not result in an increase, nor decrease, in: (1) mobile emissions related to actual transit bus revenue miles traveled;[47] (2) mobile emissions related to phase-in of new CNG buses (since no new buses would be purchased as part of the project); or (3) mobile emissions related to new Metro employee trips (since no new employees would be hired). The project would however result in (1) a redistribution of the physical location where buses from existing routes are currently parked and maintained, (2) a redistribution of the physical location where existing employees work to accommodate such changes, and (3) a change in the local bus fleet mix that currently serves the Westside and Central routes from diesel-fueled to CNG-fueled.

With respect to project-related long-term air pollutant emissions, project operations would have an effect on: (1) mobile emissions related to the change in non-revenue miles as a result of the physical location where buses from existing routes are currently parked and maintained; (2) mobile emissions related to changes in existing worker commute trip lengths due to changes in workplace facility locations; and (3) net new area- and stationary-source emissions related to the enlarged (although relocated from Venice) bus maintenance facility. The net effect on mass daily regional emissions due to long-term project operation would be as follows:

- **Revenue Miles.** The routes to be served from the new Transportation Facility are already being served by Metro. The number of routes, their lengths, and the frequency of service is not proposed to be changed. Since the Division 6 operations and maintenance facility in Venice does not have sufficient capacity to serve all of the Westside and Central routes, buses operating from other divisions are presently assigned to do so. Thus, the revenue miles associated with buses on-route is not expected to change substantially.

- **Non-Revenue Miles.**[48] Net non-revenue miles would decrease, since the bus maintenance facility would be moved from Venice (which is situated at the westernmost boundary of the service area) to an area that is more central to the overall service area. At this time, a quantitative, non-revenue miles analysis has not been conducted since it is unknown exactly how bus maintenance and overnight parking assignments would change; however, it is conservatively estimated that non-revenue miles would be reduced by an average of 2.5 miles per trip, for each bus that would be parked and maintained at the new Transportation Facility location.

[47] *Revenue miles are on-route miles, but exclude travel between the route and the operations facility.*

[48] *Also known as "deadhead" miles, non-revenue miles are travel miles which are incidental to the transit route (revenue) miles (e.g., the "out of service" travel between a service route and maintenance facility).*

- **Employee Commute-Trip VMT.** Since Metro employees reside all over the region, it is conservatively assumed that commute miles would increase for some employees and decrease for others, to result in a negligible change in overall commute trip VMT and related air pollutant emissions.

- **Area- and Stationary-Source Emissions.** Since the new Transportation Facility would occupy a larger site and more building space than the existing Venice facility, long-term project operations would result in a marginal increase in area- and stationary-source air pollutant emissions.

The project's net effect on mass daily regional emissions is summarized in Table IV.B-5 on page 149. As shown therein, the project would result in a net decrease in long-term regional mass daily emissions. This would be a beneficial effect.

Local Area CO Concentrations. During the operational phase of the project, mobile-source air pollutant emissions would have a potential to create new, or worsen existing, localized air quality impacts. The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when volume-to-capacity (V/C) ratios are increased by 2 percent at intersections with a level of service (LOS) of D or worse. As detailed in the Traffic Impact Analysis prepared by Overland Traffic Consultants, a comparison of critical vehicular movements for without project and with project scenarios indicates that the maximum V/C increase associated with project traffic at intersections with LOS D or worse would be less than 2 percent. Nevertheless, localized CO impacts were evaluated at each of the three roadway intersections that were evaluated in the Traffic Impact Analysis.

Curbside CO concentrations were estimated using the CALINE4 dispersion model developed by the California Department of Transportation, using peak-hour traffic volumes and worst-case meteorological assumptions. Worst-case meteorological conditions include low wind speed, stable atmospheric conditions, and the wind angle producing the highest CO concentrations for each case. CO concentrations were modeled under the future (2006) no project and with project conditions. As shown in Table IV.B-6 on page 150, project-generated traffic volumes would have no substantial effect on localized CO concentrations. As such, impacts related to mobile-source CO emissions would be less than significant.

Air Toxic Impacts. A bus depot would generally be the type of facility that would require a health risk assessment as a result of diesel particulate emissions. However, diesel buses are being phased out of the Metropolitan Transportation Authority bus fleet in favor of cleaner alternatively fueled vehicles. It is anticipated that buses using the project site would be fueled with CNG or another alternative fuel rather than diesel. The only diesel buses using the facility would be for occasional maintenance purposes (e.g., engine tune-ups, brake jobs, tire

Table IV.B-5

WEST LOS ANGELES TRANSPORTATION FACILITY
PROJECT BUILDOUT OPERATIONAL EMISSIONS
(Pounds per Day)

	CO	NO_X	PM_{10}	ROC	SO_X
Future with Proposed Development					
Revenue Miles	—	—	—	—	—
Non-Revenue Miles VMT Reduction	(128)	(15)	(<1)	(2)	(<1)
Worker Commute VMT	—	—	—	—	—
Area and Stationary Source	1	2	<1	<1	<1
Net Emissions	**(127)**	**(13)**	**—**	**(2)**	**—**
SCAQMD Significance Threshold	550	55	150	55	150
Over (Under)	**(677)**	**(68)**	**(150)**	**(57)**	**(150)**
Significant?	**No**	**No**	**No**	**No**	**No**

Worksheets are included in Appendix B-3 of this Draft EIR.

Source: PCR Services Corporation, 2004.

replacements, etc.). However, the project would comply with all SCAQMD rules governing the use of CNG fuel (i.e., vapor control technology and nuisance avoidance) which would limit the potential of emissions that could impact sensitive receptors in the project area. Therefore, no health risk assessment is required and no health risk impacts would be anticipated to occur as a result of the project. Project-related air toxic impacts would be less than significant.

Odor Impacts. Compressed natural gas is not odorous in its initial state. However, a compound from the mercaptan chemical group is often artificially added to CNG to assist in the ability to detect gas leaks. The refueling area on the project site would have the potential to emit odiferous emissions from the chemical compounds added to the CNG. However, the project would comply with all SCAQMD rules governing the use of CNG fuel (i.e., vapor control technology and nuisance avoidance) which would limit the potential of any odiferous emissions that could potentially impact any sensitive receptors in the project area. As such, the project would result in a less-than-significant odor impact.

(2) Sunset Avenue Project

Construction Period

Regional Mass Emissions. The existing structures that currently occupy the project site, which total approximately 15,300 sq.ft., would be demolished and replaced by a new mixed use development that would contain as many as 225 residential dwelling units and 10,000 sq.ft. of

Table IV.B-6

WEST LOS ANGELES TRANSPORTATION FACILITY
LOCAL AREA CARBON MONOXIDE DISPERSION ANALYSIS

Intersection	Peak Period[a]	Maximum 1-Hour 2006 Base Concentration [b] (ppm)	Maximum 1-Hour 2006 w/ Project Concentration [c] (ppm)	Significant 1-Hour Impact [d]	Maximum 8-Hour 2006 Base Concentration [e] (ppm)	Maximum 8-Hour 2006 w/ Project Concentration [f] (ppm)	Significant 8-Hour Impact [d]
Jefferson Blvd and National Blvd	A.M.	8.1	8.2	No	4.8	4.9	No
Jefferson Blvd and National Blvd	P.M.	8.3	8.5	No	4.9	5.0	No
Jefferson Blvd and La Cienega Blvd	A.M.	9.9	10.0	No	5.7	5.8	No
Jefferson Blvd and La Cienega Blvd	P.M.	10.2	10.2	No	5.7	5.7	No
Jefferson Blvd and Rodeo Rd	A.M.	9.2	9.2	No	5.1	5.1	No
Jefferson Blvd and Rodeo Rd	P.M.	7.5	7.5	No	4.5	4.5	No

ppm = parts per million

[a] *Peak-hour traffic volumes are based on the Traffic Impact Study prepared for the Project by Overland Traffic Consultants, April 2004.*
[b] *SCAQMD 2006 1-hour ambient background concentration (4.96 ppm) + 2006 Base traffic CO 1-hour contribution.*
[c] *SCAQMD 2006 1-hour ambient background concentration (4.96 ppm) + 2006 w/ Project traffic CO 1-hour contribution.*
[d] *The most restrictive standard for 1-hour CO concentrations is 20 ppm and for 8-hour concentrations is 9.0 ppm.*
[e] *SCAQMD 2006 8-hour ambient background concentration (3.12 ppm) + 2006 Base traffic CO 8-hour contribution.*
[f] *SCAQMD 2006 8-hour ambient background concentration (3.12 ppm) + 2006 w/ Project traffic CO 8-hour contribution.*

Source: PCR Services Corporation, 2004.

commercial space. Excavation for the subterranean parking facility would require the removal of an estimated 125,000 cubic yards of fill. Construction activities are anticipated to begin in June of 2006 and conclude by June 2008.[49] Emissions would vary from day to day, depending on the level of activity, the specific type of construction activity occurring and, for fugitive dust, the prevailing weather conditions. For example, fugitive dust emissions would occur primarily during the removal of the existing structures/tarmac and soil disturbance (e.g., site grading,

[49] *Construction activities are anticipated to occur over 24 months, in which demolition would require one month, site preparation (grading and soil export) would require 5 months, and building construction would require 18 months.*

excavation, and equipment travel over unpaved surfaces) activities. Mobile emissions, especially NO_X, would occur primarily during heavy-use periods of diesel powered equipment such as bulldozers, excavators, and haul trucks. Mobile source emissions would also result from vehicle trips by construction workers to and from the project site. ROC emissions would be released primarily during the removal of building foundations and tarmac, periods of soil excavation (due to potentially contaminated soils), asphalt paving, and architectural coatings application (i.e., paints).

A conservative estimate of the project's construction-period mass regional emissions is presented in Table IV.B-7 on page 152. As shown therein, the worst-case maximum emissions would exceed the SCAQMD daily significance threshold for NO_X while mass daily emissions for ROC, CO, SO_X, and PM_{10} would remain below their respective significance thresholds. As such, impacts related to construction-period NO_X mass daily regional emissions would be significant without incorporation of mitigation.

Local Area Concentrations. The SCAQMD has developed a set of mass emissions rate look-up tables that can be used to evaluate localized impacts that may result from construction-period emissions. If the on-site emissions from proposed construction activities are below the LST emission levels found in the LST mass rate look-up tables for the project site's Source Receptor Area (SRA), then project emissions would not have potential to cause a significant localized air quality impact.

A conservative estimate of the project's construction-period on-site mass emissions is presented in Table IV.B-7. As shown therein, the worst-case estimate of maximum on-site emissions for all criteria pollutants would remain below their respective SCAQMD LST significance threshold. As such, localized impacts that may result from construction-period air pollutant emissions would be less than significant.

Air Toxic Impacts. As discussed in Section IV.E. (Hazardous Materials) of this EIR, the proposed Sunset site has been operated as a bus facility since 1951. The site includes existing clarifiers, underground storage tanks, inspection/repair pits, the fuel pump island area, and a recently used chemical/hazardous material storage area. Results of soil samples revealed that the site showed evidence of contamination from TRPHs. Therefore, during site grading activities and the removal of building foundations and asphalt pavement there is a potential for small amounts of ROC and related TAC emissions to be released into the environment. As such, any remediation activities would be subject to SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) requirements. Among other requirements, up-wind and down-wind monitors would be used to ensure that potential toxic air concentrations remain within SCAQMD permitted levels. Complete Rule 1166 requirements are provided in Appendix B-1 of this EIR.

Table IV.B-7

SUNSET AVENUE PROJECT
ESTIMATE OF WORST-CASE EMISSIONS DURING CONSTRUCTION
(pounds per day)

	ROC [a]	NO_X	CO	SO_X	PM_{10} [b]
Demolition					
On-Site	35	52	51	0	9
Off-Site	4	63	16	1	2
Total	39	115	67	1	11
Site Preparation					
On-Site	35	45	56	0	9
Off-Site	8	172	29	2	4
Total	43	217	85	2	13
Building Erection/Finishing					
On-Site	64	49	59	0	2
Off-Site	1	1	11	0	0
Total	65	50	70	0	2
Worst-Case On-Site Total	**64**	**52**	**59**	**0**	**9**
Localized Significance Threshold [c]	—	214	1,017	—	12
Over (Under) Threshold	**—**	**(162)**	**(958)**	**—**	**(3)**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**
Worst-Case Emissions Total	**65**	**217**	**85**	**2**	**13**
Regional Significance Threshold	75	100	550	150	150
Over (Under) Threshold	**(10)**	**117**	**(465)**	**(148)**	**(137)**
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**

Construction emission calculation worksheets are included in the Air Quality Appendix.

[a] *The on-site ROC emissions estimates for demolition and site preparation have been increased by 28 pounds per day to account for potential soils-release ROC emissions that may occur during these activities. (EPA, Estimating Air Emissions from Petroleum UST Cleanups, 1989).*

[b] *PM_{10} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the site boundaries. A copy of SCAQMD Rule 403 is included in the Air Quality Appendix.*

[c] *The project site is located in SCAQMD Source Receptor Area (SRA) No. 2. These LSTs are based the site location SRA, distance to nearest sensitive receptor location from the project site (25 meters), and project area that could be under construction on any given day (five acres). Although recommended by the SCAQMD, currently, the use of LSTs for purposes of impact evaluation is voluntary.*

Source: PCR Services Corporation, 2004.

The greatest potential for TAC emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard

risk-assessment methodology. Given the relatively short-term construction schedule of 24 months, the project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions and corresponding individual cancer risk and, therefore, project-related toxic emission impacts during construction would not be significant.

Operations Period

Regional Mass Emissions. Project development would generate long-term criteria pollutant emissions from mobile, area, and stationary sources. According to the Traffic Impact Analysis prepared by Overland Traffic Consultants, the project would generate 2,243 average daily trips, which would generate mobile-source emissions; the new dwelling unit occupants would generate area-source emissions (namely ROC) due to use of certain consumer products e.g., hair spray, cleaning compounds, etc.); and stationary-source emissions would be generated because of increased energy demand (i.e., electricity and natural gas) due to new building space. Project emissions were calculated and are presented in Table IV.B-8 on page 154. As shown therein, the project's long-term mass emissions are not expected to exceed SCAQMD daily significance thresholds. As such, impacts would be less than significant.

Local Area CO Concentrations. During the operational phase of the project, mobile-source air pollutant emissions would have a potential to create new, or worsen existing, localized air quality impacts. The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when volume to capacity (V/C) ratios are increased by 2 percent at intersections with a level of service (LOS) of D or worse. As detailed in the Traffic Impact Analysis prepared by Overland Traffic Consultants, a comparison of critical vehicular movements for without project and with project scenarios indicates that the maximum V/C increase associated with project traffic at intersections with LOS D or worse would be 2 percent during the P.M. peak hour at the intersection of Rose Avenue and Lincoln Boulevard. Thus, this intersection was evaluated. In addition, to provide for a conservative analysis localized CO impacts were evaluated at all roadway intersections predicted to operate at LOS of C or worse during the A.M. or P.M. peak hour. Curbside CO concentrations were estimated using the CALINE4 dispersion model developed by the California Department of Transportation, using peak-hour traffic volumes and worst-case meteorological assumptions. Worst-case meteorological conditions include low wind speed, stable atmospheric conditions, and the wind angle producing the highest CO concentrations for each case.

CO concentrations were modeled under the future (2009) no project and with project conditions. As shown in Table IV.B-9 on page 155, project-generated traffic volumes would have no material effect on localized CO concentrations. As such, impacts related to mobile-source CO emissions would be less than significant.

Table IV.B-8

SUNSET AVENUE PROJECT
PROJECT BUILDOUT OPERATIONAL EMISSIONS
(Pounds per Day)

	CO	NO_X	PM_{10}	ROC	SO_X
Future with Proposed Development					
Mobile Source	154	19	19	15	<1
Area and Stationary Source	6	5	<1	11	<1
Net Emissions	**160**	**24**	**19**	**26**	**<1**
SCAQMD Significance Threshold	550	55	150	55	150
Over (Under) Significance Threshold	**(390)**	**(31)**	**(131)**	**(29)**	**(150)**
Significant?	**No**	**No**	**No**	**No**	**No**

Worksheets are included in the Air Quality Appendix.

Sources: PCR Services Corporation, 2004.

Air Toxic Impacts. According to the SCAQMD *CEQA Handbook*, land uses associated with toxic emissions include industrial, manufacturing, and commercial land uses such as gas stations and dry cleaning processing facilities (i.e., use of Perchloroethylene on-site). The project does not include any of these potential toxic emitting land uses. While no stationary sources of the type that could emit significant amounts of air toxics are anticipated to be located within the project site, any new stationary sources would be required to comply with SCAQMD Rule XIV (New Source Review of Air Toxics) and through air dispersion modeling, if necessary, demonstrate that the source would not exceed the maximum individual cancer risk of ten in one million. Potential sources of air toxic emissions associated with project development include, but may not be limited to small amounts of toxics from consumer household products (e.g., detergents, cleaning compounds, glues, polishes, floor finishes, cosmetics, perfume, antiperspirants, rubbing alcohol, room fresheners, car wax, paint and lawn care products). These sources are typical within the urban environment and would contribute small amounts of toxic air pollutants to the project vicinity, and would be well below any levels that would result in a significant impact on human health. Also, the project would result in removal of the existing bus depot, and thus, result in a reduction of diesel particulate emissions in the project area. As mentioned previously, approximately 70 percent of all cancer risk within the Basin is attributed to diesel particulate emissions.

(3) Combined Impacts

Construction Period. There would be no construction activity overlap between the two project sites. The Transportation Facility site would be fully completed and operational prior to the demolition and redevelopment of the Sunset Avenue site. However, there would be overlap with the Transportation Facility site operations-period emissions and the Sunset Avenue site

Table IV.B-9

SUNSET AVENUE PROJECT
LOCAL AREA CARBON MONOXIDE DISPERSION ANALYSIS

Intersection	Peak Period[a]	Maximum 1-Hour 2009 Base Concentration [b] (ppm)	Maximum 1-Hour 2009 w/ Project Concentration [c] (ppm)	Significant 1-Hour Impact [d]	Maximum 8-Hour 2009 Base Concentration [e] (ppm)	Maximum 8-Hour 2009 w/ Project Concentration [f] (ppm)	Significant 8-Hour Impact [d]
Rose Ave. and Lincoln Blvd.	A.M.	6.9	6.9	No	4.1	4.1	No
Rose Ave. and Lincoln Blvd.	P.M.	7.2	7.2	No	4.3	4.3	No
Main St. and Rose Ave.	A.M.	5.9	5.9	No	3.6	3.6	No
Main St. and Rose Ave.	P.M.	6.1	6.2	No	3.7	3.7	No
Pacific Ave. and North Venice Blvd	A.M.	6.1	6.2	No	3.6	3.7	No
Pacific Ave. and North Venice Blvd	P.M.	6.5	6.5	No	3.7	3.7	No
Pacific Ave. and South Venice Blvd	A.M.	6.6	6.6	No	3.8	3.8	No
Pacific Ave. and South Venice Blvd	P.M.	6.7	6.7	No	3.9	3.9	No

ppm = parts per million

[a] *Peak-hour traffic volumes are based on the Traffic Impact Study prepared for the Project by Overland Traffic Consultants, April 2004.*
[b] *SCAQMD 2009 1-hour ambient background concentration (4.54 ppm) + 2009 Base traffic CO 1-hour contribution.*
[c] *SCAQMD 2009 1-hour ambient background concentration (4.54 ppm) + 2009 w/ Project traffic CO 1-hour contribution.*
[d] *The most restrictive standard for 1-hour CO concentrations is 20 ppm and for 8-hour concentrations is 9.0 ppm.*
[e] *SCAQMD 2009 8-hour ambient background concentration (2.88 ppm) + 2009 Base traffic CO 8-hour contribution.*
[f] *SCAQMD 2009 8-hour ambient background concentration (2.88 ppm) + 2009 w/ Project traffic CO 8-hour contribution.*

Source: PCR Services Corporation, 2004.

construction-period emissions. As shown in Table IV.B-10 on page 156, composite emissions would exceed the SCAQMD daily construction significance threshold for NO_X while mass daily emissions for ROC, CO, SO_X, and PM_{10} would remain below their respective significance thresholds. Composite emissions would exceed the SCAQMD daily operations significance threshold for NO_X and ROC while mass daily emissions for CO, SO_X, and PM_{10} would remain below their respective significance thresholds. Nevertheless, composite mass daily emissions during Transportation Facility operations and Sunset Avenue site construction would be significant without incorporation of mitigation.

Table IV.B-10

COMPOSITE TRANSPORTATION FACILITY OPERATIONS-PERIOD AND SUNSET AVENUE CONSTRUCTION-PERIOD EMISSIONS (Pounds per Day)

	CO	NO_X	PM_{10}	ROC	SO_X
Combined Project Site Emissions					
Transportation Facility Operations-Period	(127)	(13)	—	(2)	—
Sunset Avenue Construction-Period	85	217	13	65	2
Net Emissions	(42)	204	13	63	2
SCAQMD Construction Significance Threshold	550	100	150	75	150
Over (Under)	(592)	104	(137)	(12)	(148)
Significant?	**No**	**Yes**	**No**	**No**	**No**
Net Emissions	(42)	204	13	63	2
SCAQMD Operational Significance Threshold	550	55	150	55	150
Over (Under)	(592)	149	(137)	8	(148)
Significant?	**No**	**Yes**	**No**	**Yes**	**No**

Worksheets are included in the Air Quality Appendix.

Sources: PCR Services Corporation, 2004.

Operations Period. Following the completion and occupancy of the Sunset Avenue site location, there would be overlap with respect to the Transportation Facility and Sunset Avenue site operations-period emissions. The Sunset Avenue development would result in increased regional air emissions, while the new Transit Facility development would lead to a reduction in regional air emissions due to the reduction in non-revenue mile VMT. The combined operations-period emissions analyses were conducted to show the project's net effect on regional air emissions. As shown in Table IV.B-11 on page 157, composite mass emissions would remain below SCAQMD daily significance thresholds. As such, impacts would be less than significant.

(4) AQMP Consistency

In accordance with the procedures established in the SCAQMD *CEQA Handbook*, the following criteria are required to be addressed in order to determine the project's consistency with the regional AQMP:

1. Will the project result in any of the following:

- An increase in the frequency or severity of existing air quality violations; or
- Cause or substantially contribute to new air quality violations; or

Table IV.B-11

COMPOSITE TRANSPORTATION FACILITY AND SUNSET AVENUE OPERATIONS-PERIOD EMISSIONS (Pounds per Day)

	CO	NO_X	PM_{10}	ROC	SO_X
Combined Project Site Emissions					
Transportation Facility Site Emissions	(127)	(13)	—	(2)	—
Sunset Avenue Site Emissions	160	24	19	26	<1
Net Emissions	**33**	**11**	**19**	**24**	**<1**
SCAQMD Significance Threshold	550	55	150	55	150
Over (Under)	**(517)**	**(44)**	**(131)**	**(31)**	**(150)**
Significant?	**No**	**No**	**No**	**No**	**No**

Worksheets are included in the Air Quality Appendix.

Sources: PCR Services Corporation, 2004.

- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2. Will the project exceed the growth assumptions utilized in preparing the AQMP?

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for projects include forecasts of project-related emissions in a regional context during construction and long-term operations. These forecasts are provided earlier in this section. Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of the project's pollutant emissions on localized pollutant concentrations is used as the basis for evaluating project consistency. As discussed in the preceding sections, localized concentrations for PM_{10}, CO, and NO_2 have been analyzed for the project site locations.

The analysis of on-site emissions demonstrated that PM_{10}, CO, and NO_X emissions during construction at both the Transportation Facility and Sunset Avenue site locations would not exceed SCAQMD LST significance thresholds, and therefore, would not have potential to cause a significant localized air quality impact (i.e., cause pollutant concentrations to exceed AAQS).

Based on methodologies set forth by the SCAQMD, one measure of local area air quality impacts which can indicate whether the project will cause or affect a violation of an air quality standard will be based on the estimated CO concentrations at selected receptor locations located in close proximity to the project site. As indicated earlier, CO emissions were analyzed using the

CALINE4 model. No violations of the state and federal carbon monoxide standards are projected to occur at either of the project sites.

The SCAQMD's second criterion for determining project consistency focuses on whether or not the project will exceed the growth assumptions utilized in preparing the AQMP. Determining whether or not a project exceeds growth assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with the population, housing and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis of each of these three criteria.

- Is the project consistent with the population, housing and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP if it is consistent with the population, housing and employment assumptions which were used in the development of the AQMP. The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by SCAG.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[50] With regard to air quality planning, SCAG has prepared the RCPG, which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation control portions of the AQMP, and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RCPG and AQMP are based, in part, on projections originating with County and City General Plans.

In the City of Los Angeles, each community plan implements the policies of the City of Los Angeles General Plan Framework and General Plan Elements. Therefore, if the project is consistent with the land use designations of the applicable Community Plan, pursuant to SCAQMD guidelines, it would also be considered consistent with the region's AQMP. With respect to the Transportation Facility site location, no General Plan Amendment would be required to proceed with project development, as such, regional growth related to project

[50] *SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.*

buildout at the Transportation Facility location would be consistent with baseline growth assumptions used in preparing the AQMP.

With respect to the Sunset Avenue site location, the project would not require a General Plan Amendment to accommodate residential uses at the project site. However, given the change in land use further analysis has been conducted to determine project consistency with the SCAQMD's AQMP. A comparison analysis was conducted to determine if operational emissions from the project as proposed (i.e., up to 225 dwelling units and 10,000 sq.ft. of commercial space) would be similar or less than the maximum allowable commercial/industrial development that could be developed "by right" under the existing land use designation.[51] The analysis has been provided in Appendix B-3 and is summarized in Table IV.B-12 on page 160. As shown in Table IV.B-12, emissions for all pollutants under the project as proposed, with the exception of CO and ROC, would be less than or similar to emissions from a commercial/industrial project that would also be allowed under the existing land use designation.

As shown in Table IV.B-12, CO emissions from the project as compared to a commercial/industrial project also allowed under existing zoning results in a marginal increase. In addition, the primary concern regarding project-related CO emissions is whether a project causes an exceedance of the State and federal CO standards. As indicated earlier, CO emissions were analyzed using the CALINE4 model. No violations of the State and federal carbon monoxide standards were projected to occur as a result of the project and as such this marginal increase in CO emissions as a result of project development would not result in an inconsistency with the SCAQMD's AQMP.

ROC emissions associated with the project as proposed would result in a marginal increase of 13 pounds per day of ROC in comparison to commercial/industrial development also allowed under existing zoning. The increase in emissions is due to consumer product emissions (e.g., paint, hair care products, cleaning products, etc.) from proposed residential uses. Since the SCAQMD addresses consumer product emissions in the attainment strategy of the AQMP and does so on a regional basis (i.e., limits the ROC content in products sold in the region) the project would not conflict with implementation of the goals or policies of the AQMP. In addition, it is important to note that project-related ROC emissions are substantially less than the SCAQMD daily emissions threshold of 55 pounds per day of ROC or approximately 47 percent of the threshold. Therefore, the project would be consistent with the SCAQMD's AQMP.

[51] *Based on the site's current M1-1 zoning designation, a C2-permitted use at a 1.5 to 1 FAR would be allowed, in accordance with certain limitations, per the City of Los Angeles Planning and Zoning Code. As such, a 136,000 sq.ft. general office building could be developed on the project site.*

Table IV.B-12

COMPARISON OF PROJECT EMISSIONS WITH POTENTIAL EMISSIONS THAT COULD OCCUR UNDER THE EXISTING LAND USE DESIGNATION

	ROC	NO_X	CO	SO_X	PM_{10}
Project Allowed under Existing Zoning					
Mobile	12	18	146	<1	18
Stationary	<1	7	2	1	<1
Total Existing	**13**	**25**	**148**	**1**	**18**
Project as Proposed					
Mobile	15	19	154	<1	19
Stationary	11	5	6	<1	<1
Total Project	**26**	**24**	**160**	**1**	**19**
Marginal Difference Over/(Under)	**13**	**(1)**	**12**	**—**	**1**

Emission calculation worksheets are included in the Air Quality Appendix.

Source: PCR Services Corporation, 2004.

- Does the project implement all feasible air quality mitigation measures?

As discussed below in Sub-section 3. (Mitigation Measures) to this Air Quality section, development of the Sunset Avenue project site would result in significant short-term impacts to air quality and, thus, all feasible mitigation measures are prescribed to reduce significant air quality impacts to the extent feasible. Impacts related to development of the Transportation Facility project site would be less than significant. In addition, the proposed project will incorporate a wide array of key air pollution control measures (e.g., implementation of Rule 403 requirements) identified by the SCAQMD.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

The project will serve to implement a number of City of Los Angeles and SCAG land use policies with respect to proposed development at the Transportation Facility and Sunset Avenue site locations, as discussed in Section IV.G., Land Use, of this EIR. Furthermore, the project will be required to comply with air quality regulations set forth by the SCAQMD and will include mitigation measures to reduce air quality emissions.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the project on air quality in the Basin. While development at the Sunset Avenue site would result in a short-term regional NO_X air quality impact, development of the

Transportation Facility site would result in a long-term net reduction of criteria pollutant emissions during project operations. Project development will not have a long-term impact on the regions ability to meet State and Federal air quality standards. In addition, the project will comply with SCAQMD Rule 403 and will implement all feasible mitigation measures for control of PM_{10}. Also, the project will be consistent with the goals and policies of the AQMP for control of fugitive dust. As discussed above, the project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

3. CUMULATIVE IMPACTS

There are 11 related projects identified within the Transportation Facility project study area and 21 related projects identified within the Sunset Avenue project study area in Section III.B, Related Projects, on page 88. As discussed above, the two project sites would not result in concurrent construction and since the applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be entirely speculative. A portion of the Mid-City/Exposition Light Rail Transit (LRT) alignment is located within the Transportation Facility project study area. However, construction of the LRT alignment is not anticipated to start until year 2007, which is well after the scheduled development of the Transportation Facility project site.

With respect to construction-period air quality emissions and the Basin-wide cumulative air quality condition, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal Clean Air Act mandates. As demonstrated earlier, the project would comply with SCAQMD Rule 403 requirements, and would implement all feasible mitigation measures. In addition, the project would comply with adopted AQMP emissions control measures and these same requirements would be imposed on related projects. However, the project would contribute to a significant cumulative construction air quality impact given that the Basin is non-attainment for ozone and PM_{10} and that both project sites result in short-term regional construction impacts for ozone precursors (ROC and NO_X).

With respect to long-term project operations, the SCAQMD's methodology to assess a project's cumulative impact differs from the cumulative impacts methodology employed elsewhere in this EIR, in which foreseeable future development within a given service boundary or geographical area is predicted and associated impacts measured. The SCAQMD's approach for assessing cumulative impacts is based on the SCAQMD's AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. This forecast also takes into account SCAG's forecasted future regional growth. As

such, the analysis of cumulative impacts focuses on determining whether the project is consistent with forecasted future regional growth. If a project is consistent with the regional population, housing and employment growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of ambient air quality standards and a significant cumulative air quality impact would not occur. As discussed above (AQMP Consistency discussion), the Transportation Facility project would be consistent with the underlying growth assumptions on which the AQMP is based; and the marginal increase in ROC and CO emissions that would occur as a result of development of the Sunset Avenue site would not be cumulatively considerable.

With regard to cumulative localized effects, the localized CO impact analysis evaluated the mobile CO emissions related to project, related project, and ambient growth traffic volumes. As demonstrated above, increases in localized CO concentrations would not exceed SCAQMD significance thresholds. As such, localized air quality impacts would be less than cumulatively considerable.

4. MITIGATION MEASURES

a. West Los Angeles Transportation Facility

Mitigation Measures WLA-B.1 through WLA-B.4 implement recommended mitigation measures provided in SCAQMD's *CEQA Air Quality Handbook*, Chapter 11.

Mitigation Measure WLA-B.1: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. (This measure addresses impacts regarding short-term construction-period regional mass NO_X emissions as discussed beginning on page 144 of this Section of the Draft EIR.)

Mitigation Measure WLA-B.2: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. (This measure addresses impacts regarding short-term construction-period regional mass NO_X emissions as discussed beginning on page 144 of this Section of the Draft EIR.)

Mitigation Measure WLA-B.3: Use electricity from power poles, rather than temporary diesel or gasoline powered generators if or where feasible. (This measure addresses impacts

regarding short-term construction-period regional mass NO_X emissions as discussed beginning on page 144 of this Section of the Draft EIR.)

Mitigation Measure WLA-B.4: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible. (This measure addresses impacts regarding short-term construction-period regional mass NO_X emissions as discussed beginning on page 144 of this Section of the Draft EIR.)

b. Sunset Avenue Project

Mitigation Measures Sunset-B.1 through Sunset-B.4 implement recommended mitigation measures provided in SCAQMD's *CEQA Air Quality Handbook*, Chapter 11.

Mitigation Measure Sunset-B.1: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. (This measure addresses impacts regarding construction-period regional mass NO_X emissions as discussed beginning on page 149 of this Section of the Draft EIR.)

Mitigation Measure Sunset-B.2: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. (This measure addresses impacts regarding construction-period regional mass NO_X emissions as discussed beginning on page 149 of this Section of the Draft EIR.)

Mitigation Measure Sunset-B.3: Use electricity from power poles, rather than temporary diesel or gasoline powered generators if or where feasible. (This measure addresses impacts regarding construction-period regional mass NO_X emissions as discussed beginning on page 149 of this Section of the Draft EIR.)

Mitigation Measure Sunset-B.4: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible. (This measure addresses impacts regarding construction-period regional mass NO_X emissions as discussed beginning on page 149 of this Section of the Draft EIR.)

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. West Los Angeles Transportation Facility

Construction of the Transportation Facility would result in regional emissions that exceed SCAQMD regional significance thresholds for NO_X. Mitigation measures would reduce regional construction-related NO_X emissions, inclusive of on- and off-site emission, from on-site heavy-duty construction equipment by 2 percent, which reduces overall NO_X emissions from 101 pounds per day to 99 pounds per day as provided in the Air Quality Appendix. As a result, mass daily NO_X emissions would fall below the SCAQMD significance threshold of 100 pounds per day and potential impacts would be less than significant.

b. Sunset Avenue Project

Construction of the Sunset Avenue Project would result in regional emissions that exceed SCAQMD regional significance thresholds for NO_X during the demolition and site preparation/excavation phase of construction activity when worst-case NO_X daily emissions are estimated to be 115 pounds per day and 217 pounds per day, respectively. According to URBEMIS 2002, keeping engines properly tuned and maintained in accordance with manufacturer's specifications (Mitigation Measure Sunset-B.1) will reduce NO_X emissions (as well as other pollutant emissions) by 5 percent. Mitigation Measures Sunset B.2 through B.4 would also reduce NO_X and other criteria pollutant emissions from construction equipment, but reductions are not easily quantifiable. It is important to note however that these emissions reductions would apply only to pollutant emissions attributed to on-site construction equipment, which constitutes 45 percent (52 pounds per day) and 21 percent (45 pounds per day) of NO_X emissions during the demolition and site preparation/excavation phases of construction activity, respectively.

Mitigation measures would reduce overall NO_X daily emissions during demolition activities from 115 pounds per day to 112 pounds per day; and from 217 pounds per day to 215 pounds per day during site preparation/excavation activities. However, the project would still result in regional construction emissions during demolition and site preparation/excavation that exceed the SCAQMDNO_X significance threshold of 100 pounds per day. Therefore, construction of the project would result in a significant and unavoidable impact on regional air quality.

c. Combined Impacts of Transportation Facility and Sunset Avenue Projects

During the period of concurrent ongoing operations-period activity at the Transportation Facility site location and construction activity at the Sunset Avenue site location, composite NO_X

mass daily regional emissions would exceed SCAQMD operations-period and construction-period significance thresholds, despite the above-mentioned reductions in NO_X emissions from on-site heavy-duty construction equipment operating at the Sunset Avenue site location. As such, due to composite NO_X emissions during this period of concurrent activity, impacts to air quality would be significant and unavoidable.

There would be no significant impacts to air quality attributable to concurrent air pollutant emissions during long-term operations at the Transportation Facility and Sunset Avenue site locations.

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
C. HISTORIC RESOURCES

This section identifies and evaluates historic resources that may be affected by implementation of the Sunset Avenue Project, assesses any potential impacts of the project on historic resources, and recommends mitigation. In the Initial Study regarding the West Los Angeles Transportation Facility, it was determined that that project would not have adverse impacts upon historic resources. However, precautionary mitigation recommended in the Initial Studies for both projects regarding accidental discovery of human remains from recent, historic or pre-historic periods, or of vertebrate fossil resources, during construction have been incorporated into the Mitigation Measures discussion (subsection IV.C.2.c.(2)) of this Section of the Draft EIR.

1. ENVIRONMENTAL SETTING

a. Historic Context

(1) Los Angeles

Prior to the arrival of the Spanish in California, the Los Angeles area was inhabited by the Gabrielino Indians. The earliest explorers to the region arrived in 1769, with the Gaspar de Portola Expedition. In 1781, Mexican settlers under the direction of Spanish Governor Felipe de Neve founded El Pueblo de La Reina de Los Angeles. Land to the west of the pueblo comprised four large ranchos. The largest of these was Rancho San Vicente y Santa Monica, encompassing most of the Santa Monica Mountains, Brentwood, West Los Angeles, and the City of Santa Monica. Rancho Boca de Santa Monica comprised the Pacific Palisades and Santa Monica Canyon. The present-day Palms area was situated within Rancho Rincon de los Bueyes while Rancho San Jose de Buenos Ayres encompassed present-day Westwood, land near Bel Air, Beverly Hills, and land to the north of Pico Boulevard. During the 1800s, many of these rancho lands were sold to several individuals and families.

In 1850, California was admitted as the 31st state in the Union. Many Americans flocked to California in hopes of finding gold. During the 1860s and 1870s, land to the west and north of the present-day Harbor Freeway was settled as Los Angeles began to expand. In the 1870s and 1880s, immigrants established Chinatown, to the north of Los Angeles. By the 1880s, southern California began attracting Midwesterners and Easterners with its new railroad lines. Streetcars

also made possible development of residential neighborhoods further west during the late 1880s and early 1890s.

(2) Venice Community

Venice of America, the name of the Santa Monica Bay beach resort created out of reclaimed marshland located south of the City of Santa Monica, was the result of the visionary efforts of a single entrepreneur, Abbot Kinney. In the early 1890s, Abbot Kinney formed a partnership with Francis Ryan to purchase and develop over one mile of unincorporated land south of Fremont Avenue (now Pico Boulevard) along the Pacific Ocean. Recognizing that a rail link to Los Angeles would be the key to development of the area, in 1893 Kinney donated land for the right of way and a depot to the Santa Fe railroad. Upon completion of the rail line, the partners began subdividing and selling small parcels. The community was given the name Ocean Park in 1895. With new business partners, Kinney formed the Ocean Park Improvement Company in 1902. Due to disagreements with his associates, however, Abbot Kinney quit the partnership in January 1904, taking the swampy southern portion of the Company's land for his imagined and soon to be conceived Venice project. Prior to relocating his business interests further south, however, Kinney had set in motion the incorporation of the partnership's property south of Marine Avenue (now Marine Street). On February 12, 1904 a successful vote created a new 6th class city called Ocean Park.[52] This is the area in which the project site is located.

One of the driving factors behind the area's growth and development as a beach community were the large piers, bathhouses, boardwalks, plunges, and various pier amusements that were constructed along the Santa Monica Bay and into the Pacific Ocean in the first few decades of the twentieth century. Kinney's Venice of America opened on July 4, 1905, and was considered the "Coney Island of the Pacific" during its first decades of existence. It was primarily a resort town built to resemble Venice, Italy with its network of canals and a business district designed in a Venice-inspired architectural style. The one- and two-story residences constructed along its waterways, however, tended to be inspired not by Venice, but by the Craftsman architectural style popular at the time. Abbot Kinney Pier in Venice opened in 1908 and was the crowning attraction of Kinney's ambitious beach resort. In 1911, Kinney orchestrated the change of the city's name from Ocean Park to Venice to differentiate the town

[52] *Much confusion arose from naming the new municipality located south of Marine Avenue "Ocean Park" due to the existing Ocean Park area of the City of Santa Monica that was situated north of Marine Avenue to the arroyo. The City of Ocean Park (not the Ocean Park area of Santa Monica) was renamed Venice in 1911 and eventually annexed by the City of Los Angeles in the 1920s.*

from the adjacent Ocean Park neighborhood of Santa Monica and to further promote his resort enterprises.[53]

By the 1920s and 1930s, however, the discovery and extraction of oil in the Venice area dramatically changed the ambiance of the community. Further, following Kinney's death in 1920, the canals became increasingly desirable as potential automobile roadways. The combination of numerous oil rigs erected in the beach areas along with continuing traffic congestion resulted in the filling-in of most of Venice's canals during this time period and the loss of the area's earlier quaintness and charm.

(3) Ocean Park Car House/Metro Division 6 – Venice

Convenient access to Venice from Los Angeles, Santa Monica, and other southern California cities via the Los Angeles Pacific Railway and its successor the Pacific Electric Railway soon became a key element of the resort's success in these early decades. Many of the community's new residents came from the mid-west or the east coast for retirement or to begin lives anew. With the economic and population growth of Venice and other beach areas in the early decades of the twentieth century came more intensive residential and commercial development. Main Street, which runs along the east boundary of the project site, became the primary commercial artery, servicing permanent residents and visitors. Running along the project site's west boundary is an important north-south thoroughfare, Pacific Avenue, which was originally an electric trolley right-of-way that brought passengers directly to Venice and its amusements. It was to service the electric trolley cars traveling along this route that the Ocean Park Car House (located on the project site) was constructed in 1901.

The interurban electric railways were a significant transportation element in the overall economic and population growth of Southern California in the first half of the twentieth century. A vast network of independent interurban trolley lines with names such as the Los Angeles Pacific Railway, Los Angeles and Redondo Railway, and the Pasadena and Los Angeles Railway brought passengers to the far reaches of Southern California where land was available for development. It was the convenience, speed, and low cost of transportation afforded by the electric trolleys that resulted in the horizontal expansion of the region versus the vertical concentration of settlements seen in other parts of the country. By the mid-1910s, most of the independent interurban electric railway lines had been consolidated into the Pacific Electric Railway, including the Los Angeles Pacific Railway, which was the interurban line that had made Santa Monica, Ocean Park, and Venice easily accessible to settlers and visitors.

[53] *Jeffrey Stanton, http://naid.sppsr.ucla.edu/venice/, 1996.*

In 1901, on a large parcel (the project site) located on the east side of its new trolley right-of-way, the Los Angeles Pacific Railway Company erected the Ocean Park Car House and Power House, laid multiple service yard tracks, and installed a trolley car turnaround. The right-of-way, later known as "The Trolleyway," (now Pacific Avenue) ran from Santa Monica through Ocean Park to Venice for convenient service from Los Angeles. Upon completion in 1901, the route was named the Venice Short Line. The function of the Car House, actually a pair of elongated wood and steel-framed gabled structures, was to provide service areas for the Venice Short Line trolley cars. The Power House, a large two-story masonry structure that was converted into an electrical Substation in 1904, provided the electricity that powered the electric trolleys. In 1911, the Pacific Electric Railway took over the Los Angeles Pacific Railway's operations. For the next 39 years under the Pacific Electric banner, the Ocean Park Car House, Substation, and service yard supported the electric railway. On September 17, 1950, following the accelerated post-World War II decline of electric rail travel regionally and locally due to overwhelming competition from automobile and bus transportation, Pacific Electric's Venice Short Line ceased operations. In late 1950, while still under Pacific Electric Railway management, the Ocean Park Car House was razed and the rail tracks removed so that the property could be prepared for conversion into a bus maintenance facility. All traces of the property's history as a Pacific Electric Railway service operation were lost when the masonry electrical Substation structure was demolished in 1954.

Following the removal of the Car House and rail tracks, a new Pacific Electric Railway Company bus service facility was constructed in 1951 on the site. The facility consisted of an operations building and garage, a bus washer, a service station, and newly paved parking areas for buses. In 1954, Pacific Electric Railway Company's bus passenger service was sold to Metropolitan Coach Lines which, in turn, transferred ownership of the property to the Metropolitan Transit Authority (the first Metro) in 1958. At that time the facility was named by Metro as Division 6 – Ocean Park. From 1958 until today (2004) the project site and associated buildings have experienced various alterations and upgrades under the successive ownership of the Metropolitan Transit Authority, Southern California Rapid Transit District, and the Los Angeles County Metropolitan Transportation Authority (the current owner). In 1992, while still under the auspices of the Southern California Rapid Transit District, a mural entitled "You Are Not Forgotten" was painted on the west-facing (Pacific Avenue) side of the bus washer wall by self-taught artist Peter Stewart. Figure IV.C-1 on page 170 illustrates the mural in its existing condition.

The Metro bus operation Division 6 – Venice (the name changed from Division 6 – Ocean Park in the 1960s) is one of 11 Metro bus operations divisions that are located throughout Los Angeles County. The bus operations and service facilities associated with Metro's other divisions are functionally equivalent to the Division 6 – Venice property, differing only in the arrangement of the various structures.

Figure IV.C-1
Sunset Avenue Project
Vietnam POW/MIA Memorial Mural

Source: PCR Services Corporation, 2004

b. Existing Conditions

The project site is located at 100 East Sunset Avenue and occupies an entire city block in the Venice Community of the City of Los Angeles and is located 0.3 mile south of the City of Los Angeles/City of Santa Monica boundary and 0.25 mile east of the Pacific Ocean. The site consists of a large one- and two-story office and bus maintenance building, a bus washing structure, a service station, a steam cleaning shed, and bus and automobile parking areas. A concrete wall surrounds most of the site.

(1) Survey Study Area Defined

The historic resources study area was identified based on the anticipated direct and indirect effects of the proposed project on potential historic resources. The study area was defined as the project site, which is bounded by Pacific Avenue on the west, Main Street on the east, Sunset Avenue to the north, and Thornton Place to the south. The 3.13 acre site consists of the Metropolitan Transportation Authority's Division 6 – Venice operations and service facility. All existing structures on the site are currently being utilized.

(2) Historic Resources within Study Area

The California Historical Resources Information system indicated that there are no properties listed in the California Historic Resources Inventory database maintained by the Office of Historic Preservation (OHP) within the project site. In addition, a review of literature data indicated that no previously recorded prehistoric sites exist within the study area.

The current survey process was conducted per OHP instructions, which gives a 45-year threshold for surveying properties for significance. During the current survey, two properties were identified within the study area. Summarized findings of the properties are noted in Table IV.C-1 on page 172.

Metro Division 6 – Venice Site and Associated Buildings. Completed in 1951 at a cost of approximately $315,000, a new bus service facility was commissioned by the Pacific Electric Railway's bus division on the site of the company's recently demolished Ocean Park Car House and rail yard. With the masonry shell of the railway's obsolete electric substation still occupying the site's northeast corner (which wasn't demolished until 1954) the B&B Construction Company erected a new operations building and garage, a bus washer, and a service station on the south half of the property. Following rail track removal, newly paved concrete parking areas for accommodating up to 120 buses were poured on the site. A concrete retaining wall paralleling Main Street and a five foot wire fence surrounding the remainder of the property were also erected in 1951. Entrances were located at the corner of Main Street and Sunset Avenue and

Table IV.C-1

PROPERTIES SURVEYED WITHIN THE STUDY AREA

Address	Description	Year Built	Rating
1. 100 East Sunset Ave.	Metro Division 6 – Venice site and associated buildings	1951	6Z1
2. 100 East Sunset Ave.	Vietnam POW/MIA Memorial Mural	1992	5S3

6Z1 Property found ineligible for federal, state, and local designation.
5S3 Property found ineligible for the National Register, California Register, or for local designation but eligible for special consideration in the local planning process.

Source: PCR Services Corporation, 2004.

near the south end of the parcel that paralleled the defunct Trolleyway (which was not paved for automobile use as Pacific Avenue until later in the 1950s).

The combination operations building and garage, the main building on the site, was designed in an unadorned, utilitarian vernacular modern style. The first story of the approximately 17,000-sq.ft. building originally housed bus repair and inspection operations, a repair shop, a Trainmen's Room, an office, and a store room. Designed in an "L"-shaped plan, two perpendicular one-story garage wings, one for inspection and servicing, the other for general repairs, meet at the building's elbow where a two-story operations section is located. For easy bus maneuvering, the design eliminated most supporting columns at the garage entrances. Wood truss roofs cap each of the three sections of the reinforced concrete building. The facility's second floor originally contained locker rooms, rest rooms, and business offices. An automatic bus washer costing approximately $16,500 was erected in 1951 and sited along the west property line of the parcel near the northwest corner of the main building. The utilitarian bus washing structure features steel posts supporting a metal shed roof with a concrete block wall located on the structure's west side. A service station was constructed east of the main building to supply diesel fuel, gasoline, and lubricating oil.

The property and associated buildings have experienced various alterations and upgrades under the successive ownership of the Metropolitan Transit Authority, Southern California Rapid Transit District, and the Los Angeles County Metropolitan Transportation Authority (the current owner). Upgrades include replacing the parcel's remaining chain link fencing with concrete walls, resurfacing of the bus yard, installing new bus washing equipment, and erecting new yard lighting. On the main building, new garage doors have been installed and original first and second story fenestration has been replaced with metal sliders.

Since the demolition of the Ocean Park Car House, electric Substation, and removal of rail tracks in the 1950s, any association with the history of the Pacific Electric Railway has been

lost. Additionally, the site's association with public bus transportation since 1951 is not considered historically significant because Metro's Division 6 – Venice operations and bus service facility is one of 11 such facilities located throughout Los Angeles County that are functionally equivalent to the project site, differing only in the arrangement of the various structures. Architecturally, the main operations building and garage, which has been significantly modified over the years with new fenestration, is a fairly typical example of utilitarian, vernacular modern design as applied to an operations and service facility in the 1950s. Other structures located on the site, including the bus washer and fuel station, have been upgraded or replaced with new equipment since construction in 1951. Therefore, neither the site nor the associated buildings appear eligible for listing in the National Register, California Register, or as a City of Los Angeles Historic-Cultural Monument under any criteria. Further, in accordance with CEQA Guidelines Section 15064.5(a)(2)-(3), the property is not considered a historic resource.

Vietnam POW/MIA Memorial Mural. The west-facing (Pacific Avenue) side of the concrete block bus washer wall is now covered with a mural entitled "You Are Not Forgotten" that was completed in 1992. It measures approximately 90 feet wide by 15 feet high and is situated approximately halfway between Sunset and Thornton Avenues. The mural was designed and painted by Peter Stewart, a self-taught artist who is credited with this and other murals (National Veterans Mural on Bonsall Bridge at the West Los Angeles Veterans Administration Facility) around the city. The mural is a memorial to the soldiers of the Vietnam War who were classified as Missing in Action (MIA) or Prisoners of War (POW). Included on the wall are 2,273 names of the soldiers unaccounted for in Southeast Asia. The project was done in part to raise funds for the Vietnam Veterans Aid Foundation.

Murals are an integral component of cultural expression within the City of Los Angeles. The Deputy Historic Preservation Officer of the Planning Department oversees the extensive Mural Program that includes the permitting, preservation, and conservation of murals throughout the city. The Department also maintains a database of all permitted murals. The Vietnam POW/MIA Memorial Mural located on the west-facing wall of the bus washing structure is a permitted mural in the City of Los Angeles. The United States Congress and California legislature have enacted laws (Visual Artists Rights Act, 17 USC Sections 101 et seq. and the California Art Preservation Act, Civil Code Sections 987 et seq. respectfully) which provide limited protections to murals that fall within their provisions. In certain circumstances, these laws require that property owners provide appropriate notice to artists of the intent to alter, remove, or destroy murals. As a relatively recent work of art, the mural appears ineligible for listing in the National Register, California Register, or as a City of Los Angeles Historic-Cultural Monument under any criteria, although the mural should be given special consideration in the local planning process. However, in light of relevant federal, state and local laws and regulations concerning murals, the Vietnam POW/MIA Memorial Mural can be looked upon as a historic resource pursuant to Section 15064.5(a)(2) of the CEQA Guidelines.

c. Regulatory Framework

Numerous laws and regulations require federal, State, and local agencies to consider the effects of a proposed project on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies (e.g. State Historic Preservation Office and the Advisory Council on Historic Preservation). Relevant to this project, the National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); and the California Register of Historical Resources, Public Resources Code (PRC) 5024, are the primary federal and State laws governing and affecting preservation of historic resources of national, State, regional, and local significance. Additional regulations pertinent to the project include the U.S. Secretary of the Interior's Standards for Rehabilitation of Historic Buildings, the Americans With Disabilities Act, the State Historical Building Code, and the City of Los Angeles Cultural Heritage Ordinance.

(1) Federal Level

National Register of Historic Places. First authorized by the Historic Sites Act of 1935, the National Register of Historic Places (National Register) was established by the National Historic Preservation Act of 1966, as "an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."[54] The National Register recognizes properties that are significant at the national, State and local levels.

Secretary of the Interior's Standards. The Secretary of the Interior has promulgated Standards for Rehabilitation of Historic Buildings (Standards).[55] These Standards may be used by the United States Department of the Interior, National Park Service (NPS) and other federal, State, and local agencies in reviewing and approving work to be performed on historic buildings. The Standards were written to "assist the long-term preservation of a property's significance through the preservation of historic materials and features. The Standards pertain to historic properties of all materials, construction types, sizes, and occupancy and encompass the exterior

[54] *Code of Federal Regulations (CFR), 36 Section 60.2.*

[55] *The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, U.S. Department of the Interior, National Park Service, Preservation Assistance Division, 1990. Also see 36 CFR § 67.7.*

and interior of the buildings. They also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction."[56]

Americans with Disabilities Act. The Americans with Disabilities Act (ADA) was signed into law in July 1990.[57] This civil rights statute applies to employment, as well as access to public structures and services or "public accommodations" owned or operated by private entities. In general, alterations to buildings subject to ADA must provide for disabled access. However, there are special rules and minimum access requirements where an alteration "would threaten or destroy the historic significance" of a historic building. Historic buildings include those eligible for listing in the National Register of Historic Places or designated under State or local law.[58] To use the minimum requirements, consultation is required with the State Office of Historic Preservation and, in the case of projects subject to Section 106, with the Advisory Council on Historic Preservation (ACHP).[59]

(2) State Level

The State implements the NHPA through its statewide comprehensive resource surveys and preservation programs. The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also maintains the California Historic Resources Inventory. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State's jurisdictions.

California Environmental Quality Act. Under CEQA, a "project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment."[60] This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historical resource. If so, then the second part involves determining whether the project may involve a "substantial adverse change in the significance" of the historical resource. To address these issues, guidelines that implement the 1992 statutory amendments relating to historical resources were adopted in final form on October 26, 1998 with the addition of CEQA Guideline Section 15064.5. The new

[56] *Secretary of Interior's Standards, page 5.*

[57] *42 U.S.C. §§ 12101, et seq.*

[58] *See 28 CFR § 36.405.*

[59] *See § 4.1.7 of Appendix A of the 36 CFR Part 800 Regulations.*

[60] *California Public Resources Code Section 21084.1. Added in 1992 by AB 2881.*

CEQA Guidelines provide that for the purposes of CEQA compliance, the term "historical resources" shall include the following:[61]

- "A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.

- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements in section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources, including the following:

  a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

  b. Is associated with the lives of persons important in our past;

  c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

  d. Has yielded, or may be likely to yield, information important in prehistory or history.

- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that

[61] *State CEQA Guidelines, 14 CCR Section 15064.5(a).*

the resource may be a historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1."

California Register of Historical Resources. Created by Assembly Bill 2881 which was signed into law on September 27, 1992, the California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[62] The criteria for eligibility for the California Register are based upon National Register criteria.[63] Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register of Historic Places.[64]

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

- California properties listed on the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places.
- California Registered Historical Landmarks from No. 770 onward.
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources which may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5.
- Individual historical resources.
- Historical resources contributing to historic districts.
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

[62] *California Public Resources Code Section 5024.1(a).*

[63] *California Public Resources Code § 5024.1(b).*

(3) Local Level – Los Angeles

City of Los Angeles Historic-Cultural Monuments. The City of Los Angeles enacted a Cultural Heritage Ordinance in April 1962, which defines Los Angeles Historic-Cultural Monuments (LAHCMs) for the City. According to the ordinance, LAHCMs are sites, buildings, or structures of particular historic or cultural significance to the City of Los Angeles in which the broad cultural, political, or social history of the nation, state, or City is reflected or exemplified, including sites and buildings associated with important personages or which embody certain distinguishing architectural characteristics and are associated with a notable architect. These LAHCMs are regulated by the City's Cultural Heritage Commission, which reviews permits to alter, relocate, or demolish these landmarks.

2. PROJECT IMPACTS

a. Methodology

In order to identify and evaluate historic resources, a multi-step methodology was utilized. Record searches to identify previously documented historic resources were conducted. This search included a review of the National Register of Historic Places and its annual updates, determinations of eligibility for National Register listings, and California Historical Resources Inventory database maintained by the State Office of Historic Preservation (OHP), and the City of Los Angeles Historic-Cultural Monuments list. Site inspections were made to assess existing conditions, define the historic resources study area, document potentially significant properties, and identify character-defining features of those properties evaluated as significant. A reconnaissance survey of the study area, including photography and background research, was then made. Additional background and site-specific research was conducted in order to evaluate historic resources within their historic context. National Register of Historic Places, California Register of Historical Resources, and the local city criteria were employed to assess the significance of properties.

A records search was conducted by the South Central Coastal Information Center at California State University, Fullerton to identify previously documented prehistoric and historic archaeological resources in and around the project site. Further, a paleontological resources records search of the project area was conducted by the Natural History Museum of Los Angeles County.

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[64] *California Public Resources Code § 5024.1(d).*

b. Thresholds of Significance

(1) CEQA Guidelines

The current CEQA Guidelines state that a project involves a "substantial adverse change" when one or more of the following occurs:

- Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[65]
- The significance of a historical resource is materially impaired when a project:[66]

  a. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

  b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

  c. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The Secretary of the Interior's Standards for Rehabilitation (Standards) are codified at 36 Code of Federal Regulations (CFR) Section 67.7. The Standards are designed to ensure that rehabilitation does not impair the significance of a historic property. In most circumstances, the Standards are relevant in assessing whether there is a substantial adverse change under CEQA. Section 15064.5b(3) of the CEQA Guidelines states in part that "…a project that follows the

[65] *State CEQA Guidelines, 14 CCR Section 15064.5(b)(1).*

[66] *State CEQA Guidelines, 14 CCR Section 15064.5(b)(2).*

Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historic resource."

(2) City of Los Angeles Thresholds of Significance

The following thresholds of significance are applied to the subject project as set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Under significance thresholds that are based on these factors, a project would have a significant impact on historic resources, if:

- ☐ The project would demolish, destruct, relocate, or alter a historical resource such that the significance of the historical resource would be materially impaired; or
- ☐ The project would reduce the integrity or significance of important resources on the site or in the vicinity.

c. Analysis of Project Impacts

(1) Impacts

Metro Division 6 – Venice Site and Associated Buildings. Under the proposed project, all of the buildings associated with the project site are scheduled for demolition and the site

cleared for new construction. The Metro Division 6 – Venice site and associated buildings appear ineligible for listing in the National Register, California Register, and for local designation. A final determination of eligibility will be the responsibility of the State Historic Preservation Officer with the Office of Historic Preservation. In addition, the property does not meet the criteria for consideration as a historic resource for the purposes of CEQA compliance. Therefore, the project would not result in a significant impact to historic or cultural resources.

Vietnam POW/MIA Memorial Mural. Under the proposed project, the concrete block west wall of the bus washing structure upon which the Vietnam POW/MIA Memorial Mural is painted is to be removed. Its retention in place and unaltered is infeasible since its size, location and content would not be compatible with residential development of this site. Although the mural appears ineligible for the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument, it is eligible for special consideration in the local planning process. Further, in light of relevant federal, state and local laws and regulations related to murals, the Vietnam POW/MIA Memorial Mural can be looked upon as a historic resource for the purposes of CEQA. Under this project, direct impacts would occur to the mural that would pose a significant impact on what may be considered to be a historic or cultural resource. Therefore, mitigation measures are recommended to reduce impacts to a less than significant level.

3. CUMULATIVE IMPACT ANALYSIS

None of the related projects identified in Section III.B, Related Projects, of this Draft EIR is known to adversely effect cultural resources of any sort. Although murals are a well-represented form of public art in the surrounding Venice and Santa Monica area with specialized maintenance challenges, none is known to be threatened with removal. Therefore, cumulative impacts considered in conjunction with the Sunset Avenue Project's proposed removal of the on-site MIA/POW Mural would not expand the assessment of this project impact to a significant adverse level. However, demolition of the Vietnam POW/MIA Memorial Mural would result in an adverse impact.

4. MITIGATION MEASURES

a. Metro Division 6 – Venice Site and Associated Buildings

No mitigation measures regarding the buildings and structures located on this property are required to implement the proposed project because the property is not considered a historic resource for the purposes of CEQA.

b. Vietnam POW/MIA Memorial Mural

The following mitigation measures address the proposed project and its potential to significantly impact the Vietnam POW/MIA Memorial Mural identified as a historic resource.

Mitigation Measure Sunset-C.1: Relocation. The feasibility of relocating the mural to an off-site location should be explored to mitigate project impacts on this historic resource. A determination of a reasonable and acceptable cost for the mural's relocation will be established between the Applicant, Metro, and a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. Relocation of the mural in whole to another publicly accessible location within the project area, if conducted in accordance with the guidelines recommended by the National Park Service that are outlined in the booklet "Moving Historic Buildings" by John Obed Curtis (1979), would fully mitigate the impact associated with this historic resource and the proposed project. Additionally, relocation of the mural off-site to a location with similar or compatible historical context (i.e. along a public roadway) would also fully mitigate the impact. However, prior to any relocation efforts the physical condition of the mural should be considered, assessed, and documented by a qualified historic architect and structural engineer. Additionally, the cost of relocation versus the overall historical and artistic value of the mural should be quantified in that assessment, to further evaluate relocation feasibility. The relocation plan shall also be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional. Additionally, the plan shall be reviewed and approved by the Deputy Historic Preservation Officer of the City of Los Angeles' Planning Department.[67] Because this mitigation, with the recommended cost to Applicant limitation, would not directly or indirectly affect the objectives of the proposed project, it appears feasible. (This measure addresses impacts regarding the Vietnam POW/MIA Memorial Mural as discussed beginning on page 181 of this Section of the Draft EIR.)

Mitigation Measure Sunset-C.2: Photography and Recordation. Prior to alteration, relocation, or demolition of the mural, a photographic documentation report shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. This report shall document the significance of the mural and its physical conditions, both historic and current through photographs and text. Photographic documentation should be taken utilizing 35-mm black and white film. The photographer should be familiar with the recordation of historic resources.

[67] *Effective July 1, 2004, the City Planning Department has taken over functions previously performed by the Cultural Affairs Department.*

Photographs should be prepared in a format consistent with the Historic American Buildings Survey (HABS) standards for field photography. Copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los Angeles Planning Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy. (This measure addresses impacts regarding the Vietnam POW/MIA Memorial Mural as discussed beginning on page 181 of this Section of the Draft EIR.)

c. Accidental Discovery of Human Remains or Vertebrate Fossil Resources

(1) West Los Angeles Transportation Facility Site

Mitigation Measure WLA-C.1: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-than-significant levels. (This measure addresses impacts regarding the accidental discovery of fossil resources as discussed in Appendix A, Initial Study, of this Draft EIR.)

Mitigation Measure WLA-C.2: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels. (This measure addresses impacts regarding the accidental discovery of archaeological resources as discussed in Appendix A, Initial Study, of this Draft EIR.)

(2) Sunset Avenue Site

Mitigation Measure Sunset-C.3: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-

than-significant levels. (This measure addresses impacts regarding the accidental discovery of fossil resources as discussed in Appendix A, Initial Study, of this Draft EIR.)

Mitigation Measure Sunset-C.4: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels. (This measure addresses impacts regarding the accidental discovery of archaeological resources as discussed in Appendix A, Initial Study, of this Draft EIR.)

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Under CEQA, the recommended mitigation measures would reduce the potential adverse impacts of both projects on a recognized cultural resource (the MIA/POW Mural) and on accidental discovery of the unknown, unanticipated vertebrate, fossil or traditional burial resources to less-than-significant levels.

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
D. GEOLOGY/SEISMIC HAZARDS

For purposes of this EIR section, two geotechnical studies were analyzed: Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed Metro Transportation Center, October 23, 2003, and Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed Multi-Family Residential, February 13, 2004.

1. ENVIRONMENTAL SETTING

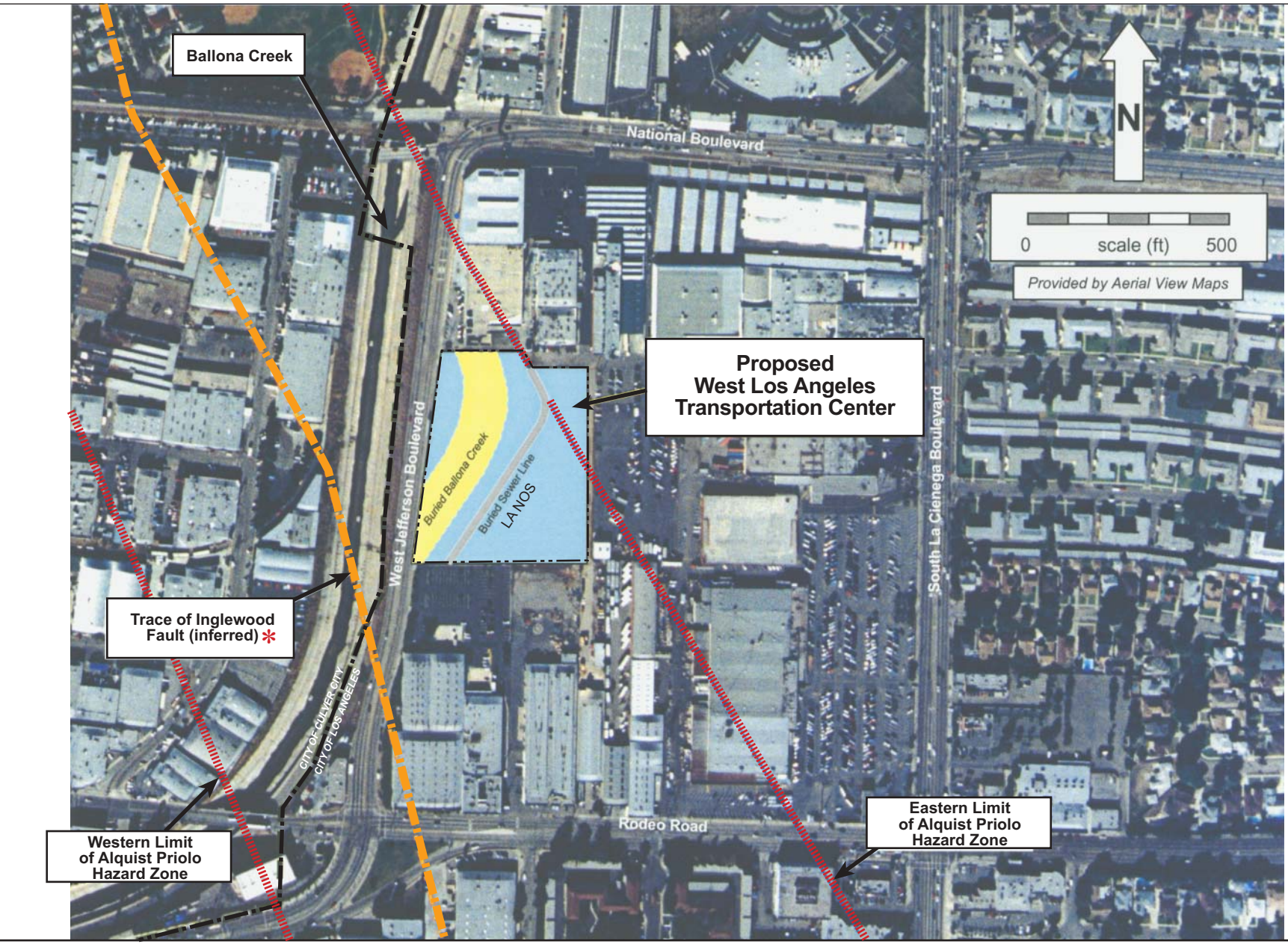
a. Existing Conditions

West Los Angeles Transportation Facility. The project site is situated in the Los Angeles Basin and is located approximately 6.2 miles north-northeast of the Pacific Ocean and nearly adjoining the Ballona Channel, which approximates the ancient drainage course of Ballona Creek. Topographically, the site and the surrounding area are relatively level with an elevation of approximately 79 feet above sea level.[68] No prominent or distinct geologic features, such as hillsides, canyons, rock outcrops or ravines exist on the site. However, located 0.5 mile south of the project site, the Baldwin Hills rise from a base height of 79 feet to a peak elevation of 511 feet above sea level.

Subsurface conditions beneath the site consist of a top layer of unconsolidated non-compacted fill underlain by alluvium.[69] The fill is associated with the historic backfilling of the former Ballona Creek and the cut and cover construction method used to install the Los Angeles North Outfall Sewer that runs through the site. Figure IV.D-1 on page 186 illustrates the locations of the creek and the outfall sewer in relation to the project site. Borings were conducted at various locations on-site at depths of 4 to 26 feet. Fill materials encountered in these borings consisted of silty to silty clayey sands, clayey silt, and sandy to silty clay gravels. At depths of zero to three feet the soils were dark brown silty sand with gravel that transitioned to olive brown silty sand with clay from three to five feet. Additionally, fill depths of up to 46 feet are reported to exist along the sewer easement. At a maximum exploration depth of

[68] *United States Geologic Survey, Beverly Hills and Hollywood Quadrangles, 1961.*

[69] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center October 23, 2003.*



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* **NOTE:**
Depiction of the Trace Inglewood Fault is inferred based on Alquist Priolo Hazard Zone maps.

Source: UltraSystems Environmental Inc.

Figure IV.D-1
West Los Angeles Transportation Facility Location of the Former Ballona Creek and the LA NOS

51 feet, alluvium was encountered underlying the fill and its materials ranged from sand to silty sand, sandy and clayey silt, and silty clay.

Sunset Avenue Project. The existing Metro Division 6 Bus Depot is situated near the coastal western edge of the Los Angeles Basin. The site is located 0.25 mile east of the Pacific Ocean and 0.3 mile south of the boundary between the Cities of Los Angeles and Santa Monica. The area surrounding the site is relatively level and is situated at an elevation between 20 and 30 feet above sea level.

The site's subsurface conditions consist of alluvium, which was consistently encountered in exploratory borings to a maximum depth of 51.5 feet.[70] This material ranged from silty sand, sand, clay, sandy clay and clayey sand with gravel. Alluvial material extracted from a depth of zero to 2.5 feet, were described as brown sand. At a depth of 15 feet, the alluvium was dark yellowish-brown and consisted of silty sand to silty sand with gravel.

(1) Tectonic Setting and Seismicity

(a) Faulting and Ground Shaking

West Los Angeles Transportation Facility. The southern California landscape has numerous faults designated as active, potentially active, or inactive. Figure IV.D-2 on page 188 illustrates the major regional faults in southern California. Active faults show evidence of one or more movements within the Holocene period, which is defined as the last 10,000 years.[71] Potentially active faults are known to have had movements prior to the Holocene period and inactive faults show no reportable movement. Three active faults are within the vicinity of the West Los Angeles Transportation Facility; the Newport-Inglewood Fault is 680 feet southwest, the Malibu Coast Fault is 8.2 miles west, and the Hollywood Fault is 5.0 miles northeast. The Santa Monica Fault is 4.0 miles north and is classified as a potentially active fault. Approximate distances between the site and these faults, as well as the associated maximum earthquake magnitude for each fault are summarized in Table IV.D-1 on page 189.

Ground rupture is defined as surface displacement caused by an earthquake. Due to the risks associated with ground rupture, the Alquist-Priolo Earthquake Fault Zoning Act was established in 1972.[72] As part of the Act, the Department of Conservation was required to map

[70] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed Multi-Family Residential, February 13, 2004.*

[71] *United States Geologic Survey, http://earthquake.usgs.gov/image_glossary/active_fault.html, 2004.*

[72] *State of California-California Geologic Survey, www.consrv.ca.gov/cgs/rghm/ap/index.htm, 2004.*

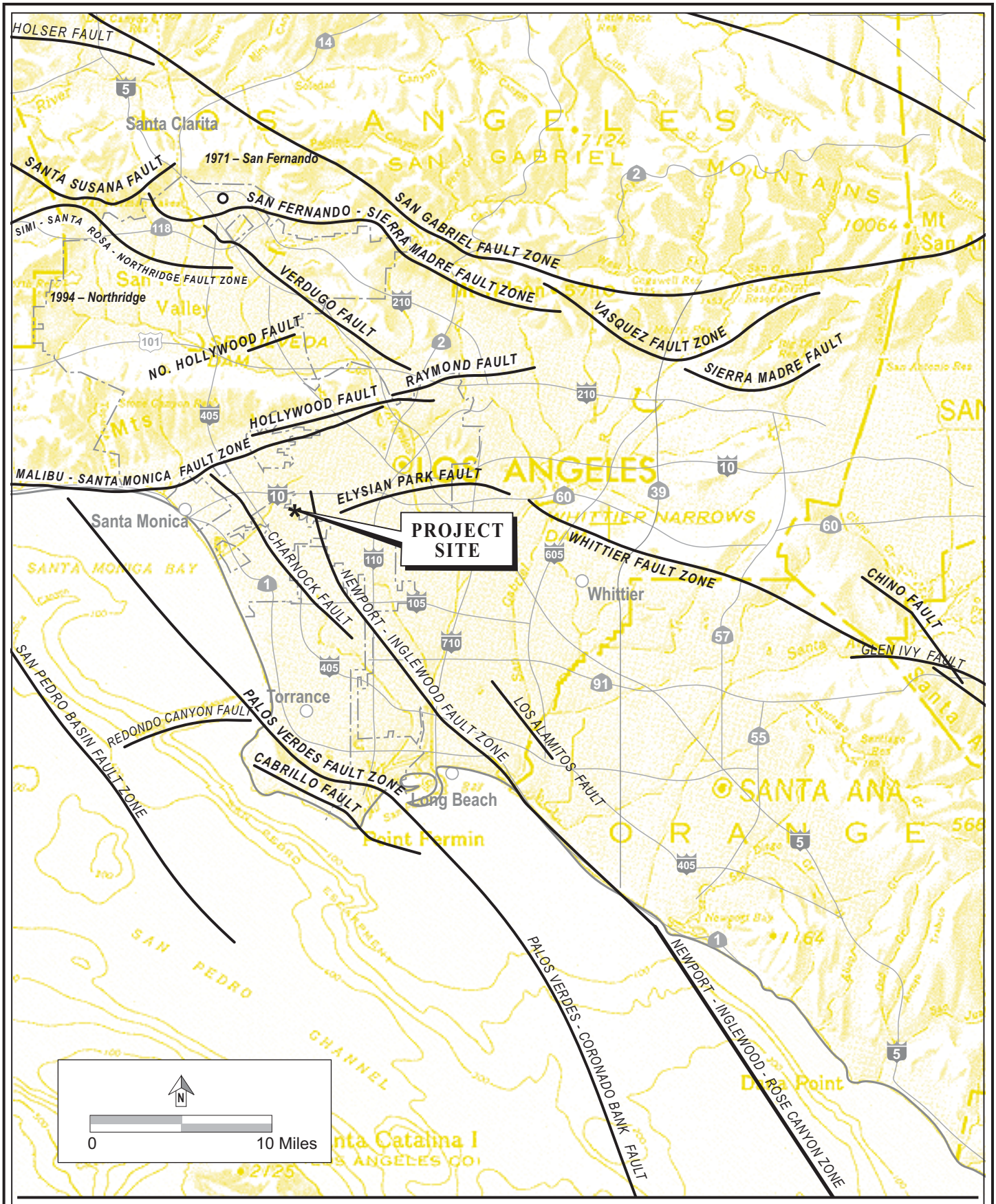

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Figure IV.D-2
West Los Angeles Transportation Facility
Major Regional Faults

Source: U.S.G.S 1999 Data 1994 Fault Activity DMG Open-File Report by C. Jennings and PCR Services Corporation, July 2003

Table IV.D-1

WEST LOS ANGELES TRANSPORTATION FACILITY
CHARACTERIZATION OF FAULTS IN THE PROJECT VICINITY

Fault	Distance from the Site	Maximum Earthquake Magnitude [a]
Newport-Inglewood Fault	0.0 mile	6.0 to 7.4
Santa Monica Fault	4.0 miles	6.0 to 7.0
Hollywood Fault	5.0 miles	5.8 to 6.5
Malibu Coast Fault	8.2 miles	N/A

[a] *The Maximum Earthquake Magnitude is measured at the most probable location for the center of the fault. As such, the Maximum Earthquake Magnitude at the portion of the faults that are nearest to the project site would be decreased.*

Source: Southern California Earthquake Data Center, 2004.

all known rupture zones throughout the state and produce maps, known as Alquist-Priolo Maps, to be available to the public and other state and local agencies. According to the Alquist-Priolo Map series, the project site is located within a delineated fault rupture zone.[73] Surface traces of the Newport-Inglewood fault have been mapped just south of the site's southern boundary, with the limit of the Alquist-Priolo Hazard Zone extending through the northeast corner of the project site. Figure IV.D-3 on page 190 illustrates the site and its relationship to the delineated Alquist-Priolo Fault Hazard Zone. Hence, the project would need to abide by policies and criteria established by the Act, which is discussed below under the Regulatory Framework section.

Sunset Avenue Project. Located within the same seismically active region as the Transportation Facility site, the Sunset Avenue site would also be susceptible to earthquake-induced ground shaking from several active faults within the project vicinity. In proximity to the project site, the Newport-Inglewood fault is 4.9 miles east, the apex of the Malibu Coast and Santa Monica faults is 4.0 miles north-northwest, and the Hollywood fault is 7.3 miles northeast.[74] Approximate distances between the site and these faults and the associated Maximum Earthquake Magnitude of each fault are summarized in Table IV.D-2 on page 191.

(b) Liquefaction

The shear strength of soil is governed by the total stresses on those soils minus the pore water pressures within the soil column. In saturated, cohesionless soils – such as sands – pore

[73] *California Department of Conservation, Division of Mines and Geology, Digital Images of Official Maps of Alquist-Priolo Earthquake Fault Zones of California, Southern Region, 2000.*

[74] *The Malibu Coast and the Santa Monica faults meet southeast of the Pacific Palisades at the Pacific Ocean coastline, www.data.scec.org/fault_index/malibuco.html, 2004.*

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Figure IV.D-3
West Los Angeles Transportation Facility
Alquist-Priolo Fault Hazard Zone

Source: California Department of Conservation, 2000.

Table IV.D-2

SUNSET AVENUE PROJECT
CHARACTERIZATION OF FAULTS IN THE PROJECT VICINITY

Fault	Distance from the Site	Maximum Earthquake Magnitude [a]
Newport-Inglewood Fault	4.9 miles	6.0 to 7.4
Santa Monica/ Malibu Coast Faults	4.0 miles	6.0 to 7.0
Hollywood Fault	7.3 miles	5.8 to 6.5

[a] *The Maximum Earthquake Magnitude is measured at the most probable location for the center of the fault. As such, the Maximum Earthquake Magnitude at the portion of the faults that are nearest to the project site would be decreased.*

Source: Southern California Earthquake Data Center, 2004.

water pressures tend to increase with the intensity of ground shaking caused by earthquakes. Liquefaction is a phenomenon where earthquake-generated ground shaking causes excessive pore water pressure in cohesionless soils, which results in near zero shear strength in the soil causing the soils to act as a viscous fluid. As a general rule, a site is susceptible to liquefaction if it satisfies the following four conditions: (1) It is subject to potential seismic activity; (2) It has soils that are cohesionless and contain less than 15 percent of clay-sized particles; including sand, silt, silty sand, and sandy silt; (3) It has groundwater present within 50 feet below ground surface (bgs) or it has the potential to rise to 50 bgs; and (4) It has soils that have relative densities of less than 70 percent.[75]

West Los Angeles Transportation Facility. According to field exploration and laboratory testing, the project site meets all four criteria for liquefaction. Additionally, the project site is designated as a liquefaction hazard zone as identified on the Beverly Hills Quadrangle of the CGS Seismic Hazard Zone map series.[76]

Sunset Avenue Project. Exploration and laboratory tests have also revealed that the soils underlying this site meet all four liquefaction criteria. Further, the Venice Quadrangle of the CGS Seismic Hazard Zones map series delineates the project site as a liquefaction hazard zone.[77]

[75] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center, October 23, 2003.*

[76] *State of California, California Geologic Survey Seismic Hazard Mapping Program – Beverly Hills Quadrangle, 1999.*

[77] *State of California, California Geologic Survey Seismic Hazard Mapping Program – Venice Quadrangle, 1999.*

(c) Lateral Spreading and Settlement

West Los Angeles Transportation Facility. The Transportation Facility site was also evaluated for its potential susceptibility to lateral spreading. Lateral spreading refers to an earthquake-induced phenomenon which results in a rapid fluid-like flow movement of the soil surface, like water. Based on the results of the analysis, a magnitude 6.9 earthquake could result in lateral spreading that would result in a displacement of 3.5 inches on the western boundary of the project site. This displacement potential decreases when moving from the western to the eastern boundary.

Settlement due to seismically induced ground shaking is also a potential risk on the site. Granular soils, such as those present on the project site, are susceptible to settlement, whether they liquefy or not. Analyses show that the site has the potential for 1.2 inches of vertical settlement.

Sunset Avenue Project. Lateral spreading on the Sunset Avenue site was determined to be unlikely. However, seismically induced settlement has the potential to occur at a rate of 0.1 inch above groundwater level and approximately 0.2 below groundwater level.[78]

b. Regulatory Framework

Both the West Los Angeles Transportation Facility and the Sunset Avenue sites are subject to the standards and guidelines established by the following regulatory framework. The information regarding the Alquist-Priolo Earthquake Fault Zoning Act is included for discussion of geologic/seismic conditions on the West Los Angeles Transportation Facility site, only.

(1) State of California

Alquist-Priolo Earthquake Fault Zoning Act. The Alquist-Priolo Earthquake Fault Zoning Act was a direct result of the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged numerous homes, commercial buildings, and other structures. Article 3, Section 3600 declares the Act's purpose is to set forth policies and criteria of the CGS Board governing the exercise of city, county, and state agency responsibilities to prohibit the location of developments and structures for human occupancy across the trace of active faults.[79] A structure for human occupancy is defined by the Act as any structure used or

[78] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed Multi-Family Residential, February 13, 2004.*

[79] *State of California, California Geologic Survey, www.consrv.ca.gov/cgs/rghm/ap/chp_7_5.htm, 2004.*

intended for supporting or sheltering a use or occupancy, which is expected to have a human occupancy rate of more than 2,000 person-hours per year. Pursuant to Article 3, the following specific criteria apply:

- No structure for human occupancy, identified as a project shall be permitted to be placed across the trace of an active fault. Furthermore, as the area within fifty (50) feet of such active faults shall be presumed to be underlain by active branches of that fault unless proven otherwise by an appropriate geologic investigation and report.

- Affected lead agencies, upon receipt of official earthquake fault zone maps, shall provide for disclosure of delineated earthquake fault zones to the public. Such disclosure may be by reference in the general plan, specific plans, property maps, or other appropriate local maps.

- Application for a development permit for any project within a delineated earthquake fault zone shall be accompanied by a geologic report prepared by a geologist registered in the State of California, which is directed to the problem of potential surface fault displacement through the project site, unless such report is waived pursuant to the approval of a project by a city or county in accordance with the Board and the findings of the State Geologist. The required report shall be based on a geologic investigation designed to identify the location, recency, and nature of faulting that may have affected the project site in the future. The report may be combined with other geological or geotechnical reports.

- A geologist registered in the State of California, within or retained by each lead agency, shall evaluate the geologic reports required herein and advise the agency.

- One (1) copy of all such geologic reports shall be filed with the State Geologist by the lead agency within thirty (30) days following the reports acceptance. The State Geologist shall place such reports on open file.

Further, Article 3 requires the preparation of a geological and/or geotechnical report to be submitted along with an application for a Development Permit.[80]

California Geologic Survey Seismic Hazards Mapping Act. The CGS provides guidance with regard to seismic hazards. Under the CGS's Seismic Hazards Mapping Act, seismic hazard zones are to be identified and mapped to assist local governments in planning and

[80] *Alquist-Priolo Earthquake Fault Zoning Act, Article 3. Policies and Criteria of the State Mining and Geology Board. Updated November 14, 2003.*

developing. Publication of the Seismic Hazards maps is intended to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and other hazards caused by earthquakes. In addition, the CGS's *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* provides guidance for evaluation and mitigation of earthquake-related hazards for projects within designated liquefaction and landslide zones.

Uniform Building Code. Uniform Building Code (UBC) standards and requirements are used by the City of Los Angeles and Metro to implement seismically-resistant structural design. For the southern California area, UBC requirements are based on design values for southern California Seismic Zone IV. The primary goal of the standards and requirements is to protect life. Standards have not been developed to a level to avoid all damage, since such design may be economically prohibitive.

(2) City of Los Angeles

Grading requirements and regulations are governed by the Los Angeles Municipal Code (LAMC). Specifically, Section 91.106.1.1 identifies the requirements for a grading permit, whereas Section 91.7006 establishes guidelines and requirements limiting the export and import of fill. In addition, Section 91.106.4.1 and Section 91.7006.2 details information regarding issuance of permits and required reports as they pertain to an Alquist-Priolo designated area.

2. ENVIRONMENTAL IMPACTS

a. Methodology

This analysis will be based on a literature review of State and local regulations, guidelines, and standards and the geologic and soils explorations and investigations performed and reported in the geotechnical studies for both locations. Additionally, as the Transportation Facility site is located within an Alquist-Priolo Fault Hazard Zone, a Fault-Rupture Assessment and its findings are incorporated into the geology discussion for the Transportation Facility.

b. Thresholds of Significance

The following thresholds of significance will be applied to the proposed project as set forth in the City of Los Angeles' *L.A. CEQA Thresholds Guide*, which states that a project would normally have a significant geologic hazard impact if:

(1) Landform Alteration

- ☐ One or more distinct and prominent geologic or topographic features would be destroyed, permanently covered, or materially and adversely modified as a result of the project. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, and wetlands.

(2) Geologic Hazards

- ☐ The project would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

c. Analysis of Project Impacts

(1) West Los Angeles Transportation Facility.

Grading and Site Design. Clearing of the project site would require the demolition of three dilapidated structures and the removal of the existing asphalt and concrete still present on-site. Once these materials are removed, a minimal amount of remedial grading would occur, sufficient to remove root systems of established fallow vegetation and the organic topsoil. The site would be carefully searched for subsurface trash, abandoned masonry, abandoned tanks and septic systems, and other debris during grading. All such materials, which are not acceptable fill material, shall be removed. Further, due to the unconsolidated nature of the fill on-site, fill materials would be removed and recompacted before construction begins. Additionally, all grading activities would comply with Los Angeles Municipal Code (LAMC) requirements and guidelines.

Implementation of the proposed grading and site design would remove the existing remnants of the site's previous industrial uses. In its current state, the site does not have distinct and prominent geologic or topographic features. Therefore, grading activities would not disturb or remove such features resulting in any adverse landform alterations.

Geologic Hazards. Due to the location of the project site within the delineated Alquist-Priolo Fault Hazard Zone, a Fault-Rupture Assessment was prepared for the Transportation Facility project. In response to the requirements and guidelines of the Alquist-Priolo Earthquake Fault Zoning Act, the report's purpose was to assess the following: (1) Determine whether surface fault ruptures occur on the portion of the site within the Alquist-Priolo Hazard Zone; and

(2) Demonstrate that proposed structures for human occupancy would not be placed over or within 50 feet of an active trace fault in the Alquist-Priolo Fault Hazard Zone.

The analysis included information from 15 exploratory borings performed by UltraSystems Environmental Inc. (UltraSystems).[81] UltraSystems utilized additional boring information from J. Byer Inc. and Advanced Geotechnical Services (AGS) which had previously performed geotechnical studies on the project site. Based on the findings of the borings and the geotechnical investigations, the following stratigraphy has been identified beneath the site:

- Artificial fill was encountered to a maximum depth of approximately 25 feet bgs;
- Holocene gravel (50-foot gravel),[82] sand, silt, and sandy clay was encountered to a depth of 50 feet bgs; and
- Late Pleistocene sand was encountered at depths of greater than 50 feet bgs.

UltraSystems and AGS both reported unconsolidated and non-compacted fill over the former Ballona Creek drainage, the existing City of Los Angeles North Outfall Sewer, and throughout most of the property that lies within the Alquist-Priolo Zone.

To assess the presence of fault-rupture areas on the site, the Fault-Rupture Assessment incorporated a trenching analysis. However, as a result of the depth of artificial fill on the project site, cut slopes in the fill would be very unstable. Excavation of deep trenches within the fill to assess fault rupture directly beneath the proposed structures would be of limited technical value and potentially unsafe. As an alternative, available data from two trenches excavated on the adjoining property to the south at 5871 Rodeo Road were used to assess the potential for fault-rupture areas to exist under the project site.[83] The trenches were approximately 75 to 90 feet in length and approximately 15 feet in depth and were excavated within the delineated Alquist-Priolo Hazard Zone area that encompassed a majority of the project site. Figure IV.D-4 on page 197 shows the locations of the analyzed trenches in relation to the project site and the Alquist-Priolo Fault Hazard Zone. Based on the findings of the 1985 trenching activity, no faulting of the 50-foot gravel or surface-fault rupture were observed. The 1985 Fault-Rupture Assessment concluded that Holocene faulting had not occurred within the property adjacent to the proposed project's southern boundary. In addition to the study used above for trenching

[81] *UltraSystems Environmental Inc., Fault-Rupture Assessment in the Alquist-Priolo Hazard Zone, March 2004.*

[82] *The area is underlain by a Holocene era deposit called 50-foot gravel; so named because it reaches a thickness of 50 feet.*

[83] *Jeffrey and Johnson, Inc., Preliminary Geologic Exploration Alquist-Priolo Special Study Zone for 5871 Rodeo Road, 1985.*

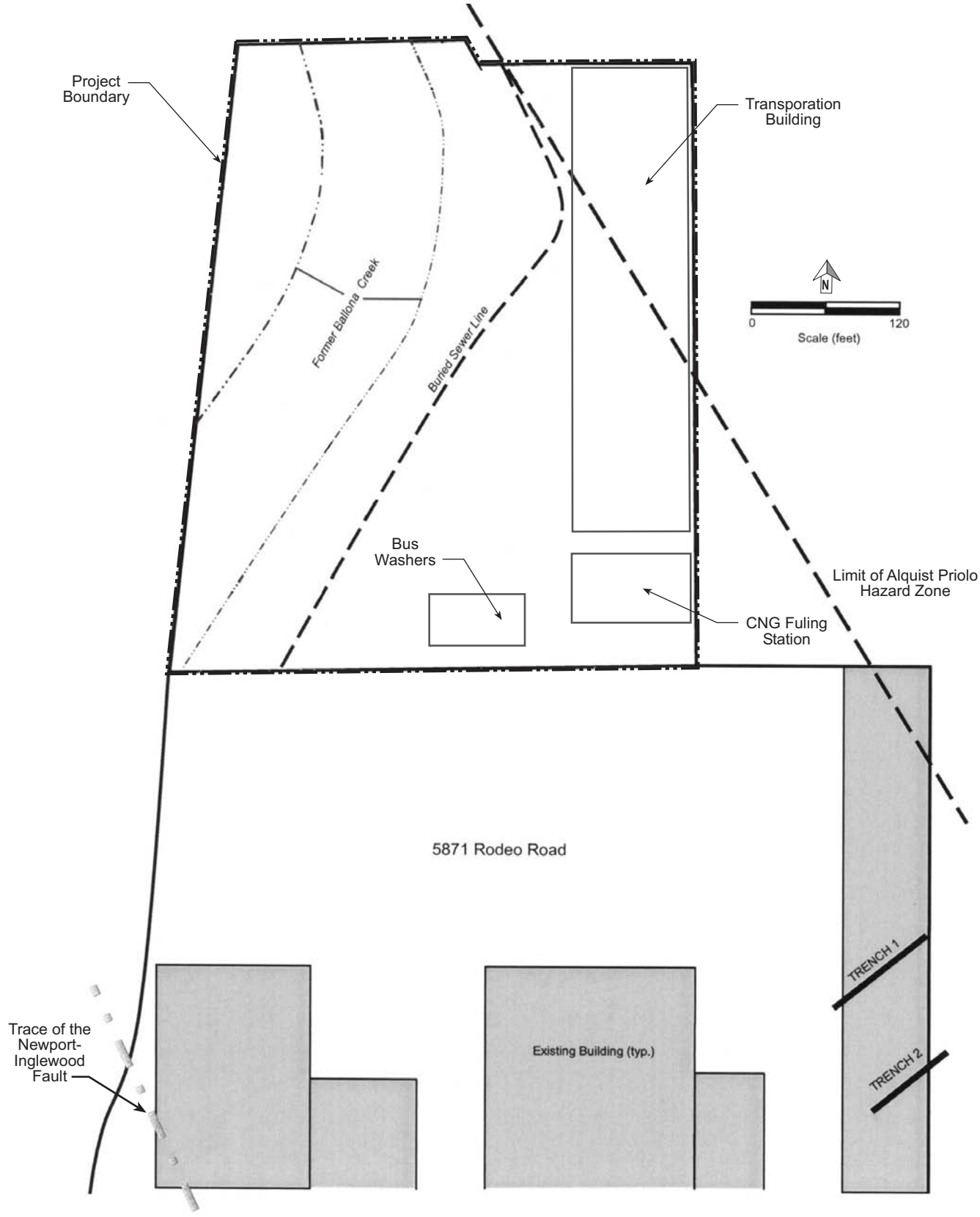

Figure IV.D-4
West Los Angeles Transportation Facility
1985 Fault-Rupture Assessment
Trenching Locations

Source: UltraSystems Environmental Inc.

analyses, UtraSystems' 2004 Fault-Rupture Assessment also included review of five other Alquist-Priolo fault studies conducted within one-half mile of the project site, prepared between 1977 and 1989. All five reports concluded that no surface fault-ruptures were identified within the Alquist-Priolo Fault Hazard Zone.

Although the site has been determined not to have fault ruptures, the project would still be subject to seismically induced ground shaking. Hence, as set forth by the Geotechnical Study, buildings to be located within the western portion of the site would be founded on deep pile foundations below the existing fill with structural slabs. Due to the depth of the fill in this area, piles may need to be as deep as 60 to 70 feet. To reduce the risk of foundation movements, it is all footings would be either supported on structural fill or on deepened piles embedded into structurally capable alluvium, but not both. The choice between these two geotechnical solutions should be based on the fill characteristics and whether structurally capable alluvium can be reached. Further, pursuant to the Uniform Building Code (UBC), the project would be designed to meet structural requirements as defined by the southern California Seismic Zone IV standards. Design standards for Seismic Zone IV include dynamic lateral-force procedures that are to be implemented to address horizontal ground acceleration.[84] As the Newport-Inglewood Fault is classified as a right-lateral fault type, this design standard would be specific to the type of ground movement that this fault could generate.[85] As the site has been determined to have potential for 1 to 2 inches of vertical settlement, structural design would also need to take these impacts into consideration. Thus, there is the potential for significant effects due to settlement.

Liquefaction. Site preparation is critical to the stabilization of the project's underlying soils for the development of a structurally sound facility that can withstand seismic-related forces. Liquefaction, which is a seismically related phenomenon, has been identified as a potential hazard for the project site. Site preparation and development of the foundation would incorporate structural design factors that would anticipate the following: (1) the live and dead loads of the structure; (2) the settlement potential of the fill and underlying soils due to the weight of the fill; and (3) swell or hydroconsolidation (collapse) if moisture changes occur within the supporting soils.[86] In order to achieve the design goals, the geotechnical study has identified several site preparation requirements for the site, of which, development of a proper drainage system is specific to reducing the potential for liquefaction. The drainage system must include gutters and roof drains that discharge directly into subsurface piping that would be

[84] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center, October 23, 2003.*

[85] *Southern California Earthquake Data Center, www.data.scec.org/fault_index/newping.html, 2004.*

[86] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center, October 23, 2003.*

directed into the local storm water drainage system. Underground plumbing and utility lines would also need to be leak free.

Although the project site would be predominately impervious, some portions of the site would have landscaping. Irrigation of these landscaped areas could allow for percolation/ saturation of the underlying soils in addition to promoting the development of root systems; both of which could cause differential movements and soil instability in the structural design. Thus, where landscaping would be adjacent to pavements, a cut-off wall would be provided that extends a minimum of 12 inches below the subgrade or it would be necessary for vegetated areas to be lined with a ten millimeter-thick plastic moisture barrier. If landscaping planters are used, they would be required to have irrigation drains or solid bottoms with drainage pipes that remove the excess irrigation waters away from structures or paved surfaces. Landscape design and the choices of trees, shrubs, and other vegetation would be planned with consideration of these design guidelines. Implementation of these drainage criteria in conjunction with the UBC provisions and site preparation requirements would reduce the potential for the project to expose people to risk of injury, or result in substantial structural or infrastructure damage from liquefaction to acceptable, less-than-significant levels.

(2) Sunset Avenue Project

Due to the historic and existing use of the site as a transportation maintenance yard, the site is known to have low-level concentrations of contaminated soils and groundwater. Therefore, the site would be completely cleared before any project related construction would take place. As this activity is related to contamination and hazardous materials, this discussion is addressed in detail under Section IV.E., Hazardous Materials, of this Draft EIR. After site preparation efforts are completed, the project site would undergo excavation for the two-level subterranean parking facility with an estimated 125,000 cubic yards of soil to be exported from the project site. All grading and soil exportation would comply with LAMC guidelines established for these activities.

These site preparation and excavation activities would be performed on a site that has been used as a transportation center since 1901. Since that time, the site has been altered several times to accommodate its changes in use. Hence, grading activities during the site design process would not result in adverse landform alterations, as no distinct and/or prominent geologic or topographic features currently exist on-site.

No known active faults pass through the project site. However, as the site is located within a seismically active region and is in proximity to several active faults, earthquake resistant structural design would be incorporated. Structural design would be based on the 1997 UBC static-force procedure along with standards established for southern California Seismic Zone

IV.[87] Use of the UBC standards are intended to protect life and may not provide an acceptable level of protection against significant cosmetic damage and serious economic loss. Therefore, a significantly higher than code lateral design parameter is required to further reduce potential economic loss during a major seismic event. These structural designs will also include features to resist settlement that may also occur on-site as a result of seismic activity.

Liquefaction. Liquefaction has also been identified as a potential risk on the Sunset Avenue site, where potential local seismic activity, soil type, groundwater levels, and soil density contribute to this potential. Analysis of the site indicates that there are several thin layers (about six inches to one foot in width) of soils susceptible to liquefaction. These layers are located at depths of 21.5 to 22.5 and 30 to 30.5 feet bgs. In the case of this project, 125,000 cubic yards of soil would be excavated to a depth of 25 feet bgs to provide for a two-level subterranean parking facility. By excavating these soils, the liquefiable layers present between 21.5- to 22.5-foot depths would be permanently removed. However, layers at 30 to 30.5 feet bgs would remain underneath the parking facility.[88] Therefore, implementation of the site preparation requirements is critical to establishing a structural foundation that would resist seismic activity. Compliance with specific drainage requirements would further reduce the potential risks related to liquefaction. Similar to the West Los Angeles Transportation Facility, minimizing the percolation/saturation of the underlying soils would reduce the potential for differential movements and soil instability in the structural design. However, in the case of this site, the subterranean parking facility would create an impervious surface underneath the entire project site. Hence, the provision of landscaping would be facilitated through the use of fully enclosed, solid bottom planter boxes. Excess irrigation waters from the planters would be removed via drainage pipes that would connect to the project's storm drain system. Therefore, compliance with applicable provision in the UBC and site preparation requirements in the geotechnical study would reduce the potential for the project to expose people to risk of injury, or result in substantial structural or infrastructure damage from liquefaction to acceptable, less-than-significant levels.

(3) Combined Impacts

Due to the geographic distance between the two projects and their distinct set of related projects, it is determined that there are no combined impacts from either construction or operation of the two sites in relation to geologic or seismic hazards.

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[87] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center, October 23, 2003.*

[88] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center, October 23, 2003.*

3. CUMULATIVE IMPACTS

Numerous related projects have been identified related to both the West Los Angeles Transportation Facility and the Sunset Avenue Project. To assess cumulative impacts of related project development and their potential affects upon distinct and prominent geologic or topographic features, aerial photographs of each project were studied in relation to the related projects maps provided in Section IV.I., Transportation and Circulation. Related projects to be developed near the West Los Angeles Transportation Facility are all located on currently developed land. The aerial shows that the related project sites are currently developed as industrial, commercial/office, or residential uses. None of the sites are currently vacant or in an undeveloped state. Similarly, related projects for the Sunset Avenue site are also to be located in developed areas. The aerial shows that urban development is continuous from the City of Santa Monica through to Los Angeles County's Marina del Rey Small Craft Harbor. A few areas that did not have structures were developed as at-grade parking lots, parks, or golf courses. This analysis has determined that the related projects and the proposed projects of this EIR would all be located on sites that have been altered by urban development. If any of these locations had distinct and prominent geologic or topographic features in the past, then they have been long removed. Therefore, the proposed and related projects analyzed in this EIR would not result in landform alterations that would have adverse cumulative impacts.

With regard to geologic hazards, one related project to the West Los Angeles Transportation Facility located at 3525 Eastham Drive would also be developed within a delineated Alquist-Priolo Fault Hazard Zone. Similar to West Los Angeles Transportation Facility, this related project would need to prepare a Fault-Rupture Assessment to determine if the site is located on a Holocene fault-rupture and have the assessment approved by the State Geologist with the California Geologic Survey. Additionally, all related projects for both the West Los Angeles Transportation Facility and the Sunset Avenue Project would need to comply with Uniform Building Code design standards for southern California Seismic Zone IV. Implementation of applicable provisions of the UBC, as well as all mitigation measures that are required pursuant to the geotechnical studies prepared for each related project, would reduce potential cumulative impacts that could result in risk of injury to people to acceptable, less-than-significant levels.

4. MITIGATION MEASURES

a. West Los Angeles Transportation Facility

With regard to seismic hazards, numerous mitigation measures for preparation of the West Los Angeles Transportation Facility site are recommended as follows:

Mitigation Measure WLA-D.1: Remove all loose soil and other deleterious materials, including old foundations, prior to fill placement. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.2: A minimum of three feet of soil should be removed and recompacted as structural fill before support footings and slab-on-grade construction begins. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.3: The exposed bottom of removal areas should be scarified, mixed, and moisture conditioned to a minimum depth of eight inches. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.4: To reduce risk of foundation movement, it is recommended that footings be supported on structural fill or on deepened piles embedded into competent alluvium, not both. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.5: If the excavation to remove existing subsurface structures, pipelines, and loose fill soils extends below the minimum depth of over-excavation, it is recommended that all subsurface structures, utility lines, and uncontrolled fill extending below the over-excavation depth be removed to expose undisturbed, native soils across the entire building pad. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.6: All fill material should be placed in controlled, horizontal layers with optimum depth and moisture. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.7: Excavated soils, cleaned of deleterious materials (including rocks), can be re-used for fill. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.8: Each layer of fill under the building area within the upper 48 inches of the finished pad grade should be of similar composition to provide a relatively uniform expansion index beneath the building. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.9: Materials to be used as compacted fill should be analyzed by the Geotechnical Engineer to determine the physical properties of the materials. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.10: An evaluation of the consequences related to lateral settlement of the project's proposed structure is recommended. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

Mitigation Measure WLA-D.11: Prior to the start of the site preparation and/or construction. It is recommended that there be a meeting with the selected contractor and Advanced Geotechnical Services, Inc., to further discuss tasks related to the backfill of utility trenches, temporary excavations, foundation types and their installation, slab-on-grade, retaining wall design, drainage, structural pavement sections, and corrosive protection.[89] (This measure addresses impacts regarding seismic hazards as discussed beginning on page 198 of this Section of the Draft EIR.)

b. Sunset Avenue Project

Mitigation Measure Sunset-D.1: Remove all loose soil and other deleterious materials, including old foundations, prior to fill placement. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.2: In areas to receive fill or to support slab-on-grade construction, a minimum of eight feet of the existing soils should be removed and recompacted as the structural fill in the proposed construction areas. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.3: The exposed bottom of removal areas should be scarified, mixed, and moisture conditioned to a minimum depth of eight inches. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.4: If the excavation to remove existing subsurface structures, pipelines, and loose fill soils extends below the minimum depth of over-excavation, it is recommended that all subsurface structures, utility lines, and uncontrolled fill extending below

[89] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center, October 23, 2003.*

the over-excavation depth be removed to expose undisturbed, native soils across the entire building pad. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.5: All fill material should be placed in controlled, horizontal layers with optimum depth and moisture. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.6: To reduce risk of foundation movement, it is recommended that footings be supported on structural fill, and that the thickness of structural fill beneath the footings and the slab area be relatively uniform. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.7: Due to the high moisture content, shallow groundwater, and high compressibility of the on-site native soil, additional stabilization methods may be required. Acceptable stabilization methods include: (1) float rock worked into the soft soils and covered with a filter fabric; (2) geofabric with a 24-inch-wide overlap between sheets; or (3) a combination of both. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.8: If construction delays or the weather result in the drying of the fill surface, the surface should be scarified and moisture conditioned before the next layer of fill is added. Each new layer of fill should be placed on a rough surface so planes of weakness are not created in the fill. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.9: Excavated soils, cleaned of deleterious materials (including rocks), can be re-used for fill. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.10: Each layer of fill under the building area within the upper 24 inches of the finished pad grade should be of similar composition to provide a relatively uniform expansion index beneath the building. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.11: Materials to be used as compacted fill should be analyzed by the Geotechnical Engineer to determine the physical properties of the materials. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.12: An evaluation of the consequences related to the potential for 0.1 to 0.2 inches of lateral settlement of the project's proposed structure is recommended. (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

Mitigation Measure Sunset-D.13: Prior to the start of the site preparation and/or construction. It is recommended that there be a meeting with the selected contractor and Advanced Geotechnical Services, Inc., to further discuss tasks related to the backfill of utility trenches, temporary excavations, shallow foundations, slab-on-grade, retaining wall design, and drainage.[90] (This measure addresses impacts regarding seismic hazards as discussed beginning on page 199 of this Section of the Draft EIR.)

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

After implementation of recommended mitigation measures for site preparation and seismic hazards, the Transportation Facility and the Sunset Avenue Project would reduce the potential for geologic hazards to result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury to acceptable, less-than-significant levels.

Due to the geographic distances between the two sites it is determined that there would be no combined impacts after mitigation measures are implemented on each site. Hence, the level of significance after mitigation at both locations would reduce the potential for geologic hazards to acceptable, less-than-significant levels.

[90] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed Multi-Family Residential, February 13, 2004.*

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
E. HAZARDOUS MATERIALS

For purposes of this Hazardous Materials analysis, several documents were reviewed and their information incorporated below. Documents for the West Los Angeles Transportation Facility were prepared by Environmental Support Technologies, Inc., (EST) and included a Phase I Environmental Site Assessment Addendum, two Soil Assessment Reports, and Further Phase II Site Assessment Reports. Documents for the Sunset Avenue Project were prepared by MACTEC and included a Phase I Environmental Site Assessment, a Phase II Environmental Site Assessment, and a Final Streamlined Risk Assessment.[91]

1. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) West Los Angeles Transportation Facility

The proposed Transportation Facility site has been used for light industrial purposes since 1952. Carnation Creamery used the site as a distribution center and constructed three structures, totaling approximately 9,000 sq.ft., which are still present on-site. Ownership of the property changed over to the Sparkletts Drinking Water Company (currently McKesson Water Products) in 1972. McKesson operated a water, food, and coffee distribution center from this location until 2001.

In the Phase I Environmental Site Assessment (Phase I) prepared for the Transportation Facility site, several areas of potential environmental concern were identified. These areas include the former clarifiers, a former chemical storage shed, hydraulic lifts, surface drains, and the sanitary sewer system. In response to the identification of these potential hazard areas, EST's findings are discussed below.

[91] *Final Report – Streamlined Risk Assessment, August 17, 2004.*

(a) Hazardous Substances

As part of the first Soil Assessment Report (soil assessment), a total of six soil borings were performed on the project site.[92] Specifically, for each of the areas of potential concern (i.e., the former clarifier, the hydraulic vehicle lifts inside the garage, and the former chemical storage shed/storm water inlet), two soil borings were conducted. Results of the soil samples revealed that the site showed evidence of contamination from acetone, total recoverable petroleum hydrocarbon (TRPHs), gasoline-range total recoverable petroleum hydrocarbon (TRPHg), and fuel oxygenates. A second, site-specific, Soil Assessment was performed in the area of the sewer line that runs through the property.[93] This site specific analysis was performed to address the presence of MTBE found in the soil samples in this area. This additional investigation proved that the sewer was not the source of MTBE, thus its presence is from an unidentified source, unrelated to the project site. Additionally, a Further Phase II Site Assessment Report (Phase II) was prepared which addressed the findings of nine groundwater borings performed on-site.[94] As part of the Further Phase II, groundwater samples were analyzed for TRPHs, total volatile petroleum hydrocarbons (TVPHs), aromatic gasoline compounds, MTBE, and TAME. Each of the detected constituents and their affects on soil or groundwater are discussed below. Figure IV.E-1 on page 208 shows the locations of the six soil samples and the nine groundwater boring locations.

Acetone

Soils. Acetone, a colorless liquid with a distinct smell and taste, evaporates easily, is flammable, and dissolves in water. It is used to make plastic, fibers, drugs, and other chemicals and can also be used to dissolve other substances.[95] Concentrations of acetone were found at a range of 13 micrograms per kilogram (µg/Kg) to 81 µg/Kg.[96] EST has concluded that these detected concentrations of acetone are low and pose little threat to the environment as the chemical is very water soluble and biodegradable.

Groundwater. Groundwater samples were not analyzed for acetone. However, as stated above, acetone found in low concentrations in the soil samples was determined to pose little

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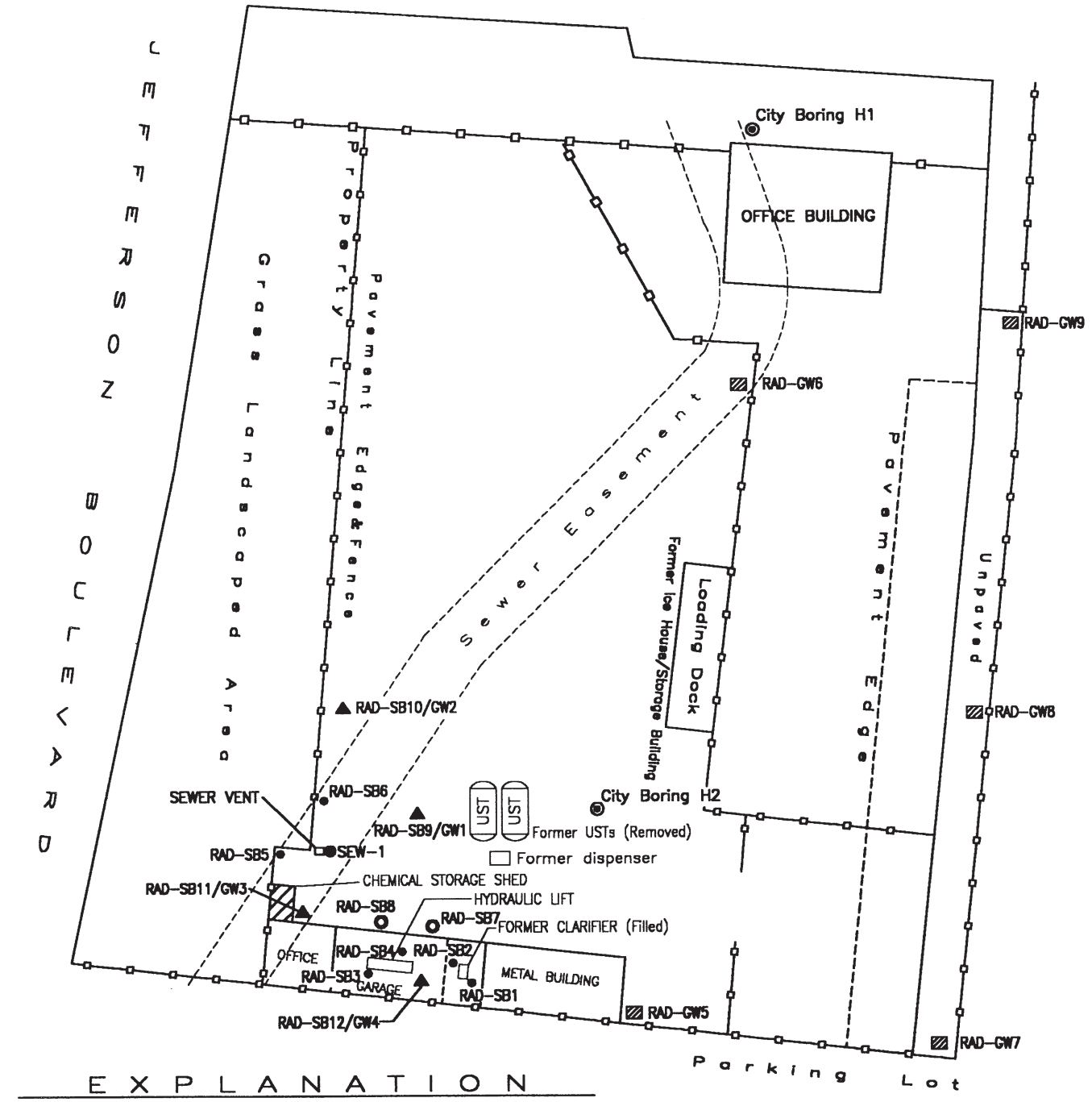
[92] *Environmental Support Technologies, Inc., Soil Assessment Report, July 22, 2003.*

[93] *Environmental Support Technologies, Inc., Soil Assessment – Vicinity of Sewer Line/Sewer Vent, June 2, 2004.*

[94] *Environmental Support Technologies, Inc., Further Phase II Site Assessment, November 18, 2003.*

[95] *Agency for Toxic Substances and Disease Registry, www.atsdr.cdc.gov/tfacts21.html, 2004.*

[96] *Detection limit: the analytical test method for acetone does not register on soil samples with concentrations below 10 µg/Kg.*



EXPLANATION

- APPROXIMATE LOCATION OF PREVIOUS SOIL BORING (City of Los Angeles, ~~Date?~~)
- APPROXIMATE LOCATION OF A PREVIOUS SOIL BORING (EST, July 2003)
- APPROXIMATE LOCATION OF A PREVIOUS SOIL BORING (EST, October 2003) (Soil samples @ 2, 5, and 10 feet below grade)
- APPROXIMATE LOCATION OF A PREVIOUS SOIL BORING (EST, October 2003) (Soil samples @ 2,5, and 10 feet below grade and groundwater)
- APPROXIMATE LOCATION OF A PREVIOUS BORING TO GROUNDWATER (EST, October 2003) (Groundwater samples only)
- APPROXIMATE LOCATION OF A HAND-AUGER SOIL BORING (EST, May 2004) (Sewer line investigation)

PCR

N

0 75 Feet

Scale in approximate feet

Source: Environmental Support Technologies, 2004

Figure IV.E-1
West Los Angeles Transportation Facility
Boring Location Map

threat to the environment. Further, as acetone is very water soluble and biodegradable, it can be concluded that the chemical also poses little or no threat to groundwater.

Total Recoverable Petroleum Hydrocarbons (TRPHs) and Total Volatile Petroleum Hydrocarbons (TVPHs)

Soils. Five of the six borings showed evidence of TRPHs, one with minimal concentrations of 11 milligrams per Kilogram (mg/Kg) and another with a maximum of 61,000 mg/Kg. Maximum concentrations were discovered two feet below grade in the central portion of the former maintenance garage and in the general location of the underground outfall sewer. EST's analysis determined that the concentrations of TRPHs decreased with increasing depth in each soil sample. Therefore, EST concluded that TRPHs were confined to shallow soils in both lateral and vertical extent and thus poses little threat to human health or the environment due to its typically low mobility due to low water solubility and viscosity. However, those soils impacted with TRPH concentrations of 1,000 mg/Kg or greater would need to be removed or treated on-site for TRPHs.

Groundwater. Of the nine groundwater samples collected during the Further Phase II Assessment, one sample showed evidence of TVPHs.[97] The sample contained a TVPH concentration of 110 micrograms per liter (µg/L) in addition to the following aromatic gasoline compounds: 8.1 µg/L of toluene, 3.2 µg/L of ethylbenzene, and 27.4 µg/L of total xylene. Toluene is a clear, colorless liquid with a distinctive smell that occurs naturally in crude oil and is added to gasoline.[98] Ethylbenzene is a colorless, flammable liquid that smells like gasoline. It is found in natural products such as coal tar and petroleum and is used as a solvent, in fuels, and to make other chemicals.[99] Xylene is a colorless, sweet-smelling liquid that catches on fire easily and occurs naturally in petroleum.[100] The source of the TVPHs and aromatic gasoline components is unknown, but does not pose a significant environmental threat.

Fuel Oxygenates

Soils. Fuel oxygenates are associated with gasoline and have been used since the 1980s as an additive to achieve more efficient burning.[101] Two oxygenates, methyl tert butyl ether (MTBE) and tert amyl methyl ether (TAME) were detected in soil samples at low

[97] *Environmental Support Technologies, Inc., Further Phase II Site Assessment, November 18, 2003.*

[98] *Agency for Toxic Substances and Disease Registry, www.atsdr.cdc.gov/tfacts56.html, 2004.*

[99] *Agency for Toxic Substances and Disease Registry, www.atsdr.cdc.gov/tfacts110.html, 2004.*

[100] *Agency for Toxic Substances and Disease Registry, www.atsdr.cdc.gov/tfacts71.html, 2004.*

[101] *Agency for Toxic Substances and Disease Registry, www.atsdr.cdc.gov/tfacts91.html, 2004.*

concentrations. MTBE and TAME are flammable liquids with a distinctive, disagreeable odor. Both substances are extremely persistent in the environment and are highly dissolvable in water. According to the Phase I Environmental Site Assessment Addendum, the source of the oxygenates is not known. The second Soil Assessment, performed specifically to address the previous finding of MTBE in the vicinity of the sewer line has determined that samples did not contain detectable concentrations of fuel oxygenates. Hence, it has been determined that the sewer line is not the source of the MTBE.[102]

Groundwater. Two of the nine groundwater samples had detectable levels of MTBE at concentrations of 2.6 µg/L and 72 µg/L, respectively. The source of these low concentrations of MTBE is unknown, though the potential for the contaminants to be related to a gasoline plume, originating from a location southeast of the project site, cannot be dismissed. EST determined that the concentration levels did not pose a significant environmental threat.

Underground and Aboveground Storage Tanks

According to the Phase I Environmental Site Assessment and the Addendum, the site is documented as having had two underground storage tanks (USTs). Both of the former USTs were 12,000-gallon diesel tanks and were removed from the site in September 1988 and March 1999. Residual concentrations of petroleum hydrocarbons detected in soil and groundwater samples collected from the UST area were acceptable to leave in place and the Los Angeles Regional Water Quality Control Board (LARWQCB) granted case closure for both USTs.[103] Additionally, five groundwater monitoring wells used as part of the UST monitoring system, existed on-site. All five wells have been officially abandoned, but only three have been removed. EST found that the two remaining wells have been back-filled to approximately five feet below ground surface (bgs).

Asbestos and Lead

The Phase I Environmental Site Assessment Addendum identified that there were no detected levels of asbestos or lead found on-site. No further analysis was required.

[102] *Environmental Support Technologies, Inc., Soil Assessment – Vicinity of Sewer Line/Sewer Vent, June 2, 2004.*

[103] *Environmental Support Technologies, Inc., Phase I Environmental Site Assessment Addendum, October 30, 2003.*

(2) Sunset Avenue Project

Developed as a rail yard in 1901 by the Los Angeles Pacific Electric (LAP), the Sunset Avenue site continued to operate as a rail facility until 1950. LAP converted the site to a motor coach operation that opened for service in 1951. As a motor coach facility, the site has been owned and operated by Metropolitan Coach Lines and the Metropolitan Transportation Authority (Metro) of which the latter is the current owner. Properties surrounding the site were generally developed with residential neighborhoods by the early 1900s and have not significantly changed since that time. However, a manufactured gas plant and a lumber yard were historically located east and northeast, respectively, of the site.[104] These properties are now occupied by residential and commercial uses.

A Phase I Environmental Site Assessment (Phase I) was prepared to assess the existing recognized environmental conditions (RECs) and historically recognized environmental conditions (HRECs) that may be of potential concern. Identification of the RECs and HRECs was based on readily available documentation and site reconnaissance.[105] REC areas include the existing clarifiers, USTs, inspection/repair pits, the fuel pump island area, and a recently used chemical/hazardous material storage area. HREC areas include the following past uses: railroad tracks, electrical substation, wooden crude oil tank, gas storage building, off-site manufactured gas plant facility, abandoned clarifiers, and the former UST locations.

(a) Hazardous Substances

RECs and HRECs – Phase I Environmental Site Assessment

According to the Phase I, four clarifers and two sumps are located on-site. A clarifier's purpose is to remove sand, grit, and gross solids from waste and storm waters via gravity.[106] A clarifier and an interceptor are located on the south side of the existing fuel pump island. The structures receive spills and runoff from the linear grates that surround the island. Two additional clarifiers are located adjacent to the bus-washing bay; one receives runoff from the steam cleaning process and the other receives runoff from bus washing. Additionally, two sumps are also located near the bus-washing bay and are used to recycle excess water. All of the clarifiers and sumps are serviced regularly by a private contractor, while the City of Los Angeles Bureau of Sanitation monitors the discharge from these structures three times per year. Both the clarifiers and the sumps were installed in 1998.

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[104] *MACTEC Phase I Environmental Site Assessment, March 5, 2004.*

[105] *MACTEC, Phase I Environmental Site Assessment, March 5, 2004.*

[106] *U.S. Filter, http://usfilter.com, 2004.*

During removal of seven USTs in 1998, soil samples were collected by Tyree Organization Ltd. ("Tyree report") from beneath the excavated tanks.[107] Detectable concentrations of TVPHg, TVPHd (diesel), and TRPH were found in soils beneath four tanks removed from the east side of the site at concentrations of 1,390 milligrams per Kilogram (mg/Kg), 5,000 mg/Kg, and 23,600 mg/Kg, respectively.[108] Soil samples taken from beneath two USTs, also previously located on the east side of the site did not contain suspect constituent concentrations above the laboratory limits. Finally, the seventh UST, removed from the site's south side, showed detectable TRPH at concentrations of 145 mg/Kg. The Tyree report documented that the contaminated soils generated during the excavation process were transported from the site to a soil recycling facility. Remaining soils were used as "clean" backfill or were transported off-site to a landfill or a soil recycling facility. A subsurface soil and groundwater investigation was requested by Metro that led to the installation of four groundwater monitoring wells in 1999.[109] These wells were installed on the east side of the site around the existing USTs associated with the fuel island. Two additional wells were installed in February 2002; one is located in the northeast quadrant of the site, while the sixth well is located within a parking lot on the east side of Main Street. Groundwater from these wells is sampled quarterly with reports filed with the LARWQCB. Data collected from these groundwater samples determined that the USTs in the fuel island area of the site were the source of petroleum impacts to groundwater.

As a bus maintenance facility, several types of hazardous materials are used and properly stored on-site. Based on the Phase I site reconnaissance, the former corrosive chemical storage area was observed to have a 2-by-15-foot area of etched concrete on the slab floor. The cause of the etching may have been from previous spills of battery acid or solvents. The potential for hazardous chemicals to migrate through the concrete or travel through the joint between the floor slab and the block wall cannot be discounted. Additionally, Table IV.E-1 on page 213 documents the observed hazardous and petroleum products and their locations within the facility. These items represent the identified RECs present on the project site.

In addition to the existing conditions, the Phase I reviewed historic records, Sanborn maps, topographic maps, and aerial photographs to assess the presence of HRECs on the site.[110] These former uses and areas include the railroad tracks, the electrical substation building, a wooden crude oil tank, a gas Storage building, a nearby manufactured gas plant facility, Inspection/repair pits, and the former UST location.

[107] *MACTEC, Phase I Environmental Site Assessment, March 5, 2004.*

[108] *Tyree Organization Limited, Report on Underground Storage Tank Removal, May 21, 1999.*

[109] *MACTEC, Final Report of Phase II Environmental Site Assessment, April 15, 2004.*

[110] *MACTEC, Phase I Environmental Site Assessment, March 5, 2004.*

Table IV.E-1

SUNSET AVENUE PROJECT
HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS

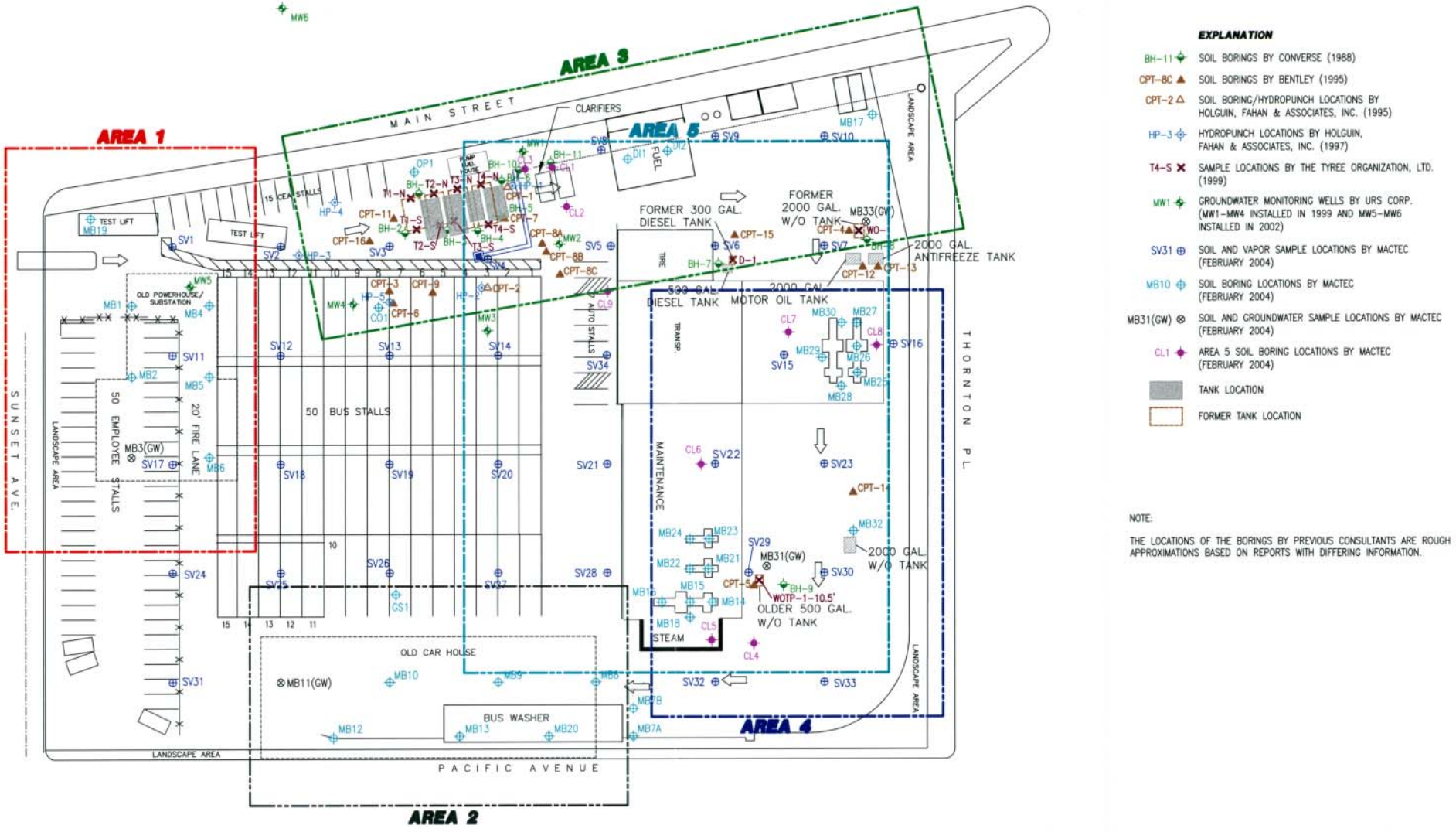
Material	Location/Comment
"Non-RCRA Hazardous Waste-Liguide Ethylene Glycol Solution	Fuel pump island area. Container is located on a secondary containment basin and contains waste coolant/anti-freeze.
55-gallon drums of oil and lubricants	Flammable materials steel storage container at the southeast corner of the site. Storage container has a steel grate floor with containment areas for spills.
55-gallon containers of vehicle detergents	Fenced storage area at the southeastern corner of the site. No obvious spills or stains observed on the underlying concrete slab.
55-gallon drums of transmission fluid, gear lubricant, and motor oil	Most of the drums are stored upon secondary containment platforms. Concrete floor slab appears moderately stained.
Vehicle batteries	"Lead Acid Battery Storage" room on west side of the bus maintenance area. Some minor staining on the concrete slab was observed.
Seven 55-gallon drums labeled "Drained Used Oil Filters"	Bus maintenance area. Drums are stored on secondary containment platforms. Some very minor staining was observed on the adjacent concrete slab.
Miscellaneous cleaning compounds inside flammable storage cabinet	South end of bus wash rack.
One 250-gallon (estimated) container labeled "Power Wash Concentrated Biodegradable Non-Hazardous Non-Flammable Industrial and Institutional Degreaser."	East side of the bus wash rack.
One 275-gallon and two 55-gallon containers labeled "Degreaser" and one 275-gallon container of power wash	Steam cleaning rack area.
55-gallon drums containing transmission fluid and lubricant	Throughout the bus maintenance area
Spray paint and other maintenance chemicals inside flammable materials storage cabinets	Central portion of the bus maintenance area

Source: MACTEC Phase I Environmental Site Assessment, March 5, 2004.

2004 Phase II Environmental Site Assessment (Phase II)

Based on the Phase I assessment, the Phase II established five geographic areas related to the current and past uses that may have resulted in adverse affects on soils or groundwater. Figure IV.E-2 on page 214 shows the locations of these five geographic areas. These five areas are also listed and defined in Table IV.E-2 on page 215.

Between January 28, 2004, and February 13, 2004, MACTEC performed a total of 34 soil and soil vapor probes, 43 soil borings, and 4 soil and groundwater borings in five areas on the project site, as listed in Table IV.E-2 on page 215. Soil and groundwater samples were analyzed



PCR

0 50 Feet

Scale In Approximate Feet

Source: Mactec, 2004

Figure IV.E-2
Sunset Avenue Project
Soil & Groundwater
Boring Locations by Area of Concern

Table IV.E-2

SUNSET AVENUE PROJECT
SOIL AND GROUNDWATER BORING LOCATIONS BY AREA OF CONCERN
BASED ON PHASE II ASSESSMENT

Area of Concern	Location
Area 1	Former rail yard powerhouse and substation previously located on the northern portion of the site.
Area 2	Former rail yard car house and current Metro bus washer; includes the former gas storage building location.
Area 3	Former and current gasoline and diesel USTs And dispenser island on eastern side of site. This area also includes the former crude oil tank and fuel pump house.
Area 4	Existing Metro bus maintenance trenches and former waste oil tanks.
Area 5	Existing/former clarifiers, oil water separators, and sumps.

Source: MACTEC, Final Report of Phase II Environmental Site Assessment, April 15, 2004.

for several contaminants including volatile organic compounds (VOCs), Title 22 Metals,[111] polynuclear aromatic hydrocarbons (PAHs), total cyanide and herbicides, TRPHs (both gasoline and diesel), polychlorinated biphenyl (PCBs), and fuel oxygenates.

Volatile Organic Compounds – VOCs

Soil. VOCs is a generalized term for several chemical compounds with carbon as a main constituent. VOCs evaporate readily at room temperature and have a high vapor pressure.[112] VOCs were detected in soil samples in Areas 2, 3, and 5. In Area 2, VOCs 1,3,5-trimethylbenzene and 1,2,4-trimethylbenzene were each detected at levels of 13 µg/Kg at a depth of 1 foot bgs.[113] One sample in both Areas 3 and 5 contained VOC concentrations of 1,736 µg/Kg at a depth of 10 feet bgs and 18.3 µg/Kg at a depth of 1 foot bgs, respectively. As discussed in detail below, these constituents were analyzed in the Streamlined Risk Assessment, which determined that the detections of VOCs found during the Phase II investigation are not chemicals of potential concern (COPCs).

Groundwater. Due to the near surface impacts of VOCs and their low level concentrations found in Areas 2, 3, and 5, these constituents do not pose a threat to groundwater and no further analysis is required.

[111] *Title 22 Metals include antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, selenium, silver, thallium, vanadium, and zinc.*

[112] *California State University-Bakersfield, www.csubak.edu/~mevans/stowe/acronym.htm, 2004.*

[113] *MACTEC, Final Report of Phase II Environmental Site Assessment, April 15, 2004.*

Title 22 Metals

Results of the soil analyses indicate that of the 17 metals in the Title 22 search, low level detections of antimony, beryllium, cadmium, mercury, molybdenum, selenium, silver, and thallium were found. However, each of these metals were detected below their respective reporting limits (i.e., practical quantitation limits). For purposes of the Phase II, the initial evaluation of all metals resulted in a not detected (ND) result. Further, Title 22 metals were not detected in the groundwater samples. Therefore, as verified in the Streamlined Risk Assessment described below, no further analysis of metals in soils on the project site is required.

Polynuclear Aromatic Hydrocarbons – PAHs

Soils. In one soil sample from Area 1, results indicate the presence of PAHs at concentrations of 0.43 mg/Kg and 0.44 mg/Kg at depths of one foot bgs. Area 2 results indicate PAH impacts at depths of 1.5 feet bgs mostly related to oil and grease. PAH concentrations in Area 5 were detected at 7.78 mg/Kg at a depth of 14.5 feet bgs. Overall, results of the PAH analyses are spatially scattered and are not representative of the entire site. As discussed below, the Streamlined Risk Assessment confirmed that PAHs do not appear to be significant contributors to risk/hazard for the project site.

Groundwater. Due to the low concentrations of PAHs in the soil samples, and their absence in the groundwater samples, it is determined that PAHs detected in Areas 1, 2, and 5 pose no threat to groundwater. No further analysis is required.

Total Cyanide and Herbicides

No detectible concentrations of cyanide or herbicides were found in either soil or groundwater samples from any of the five areas on the project site. No further analysis is required.

Total Recoverable Petroleum Hydrocarbon (TRPHs) and Total Petroleum Hydrocarbons – Gasoline or Diesel (TPHg or TPHd)

Soils. In Area 1, TRPH was detected in two soil samples. In the first sample, TRPH concentrations of 6,300 mg/Kg and 5,000 mg/Kg were found at depths of 1 and 5 feet bgs, respectively.[114] The second sample showed concentrations of 5,600 mg/Kg and 21 mg/Kg at depths of 1 to 15 feet bgs, respectively. Within Area 2, four borings were taken; two in the area

[114] *MACTEC, Final Report of Phase II Environmental Site Assessment, April 15, 2004.*

of the fuel island, one in the former area of the crude oil tank, and one in the area of the former pump house. Of the two borings taken by the fuel island, one soil sample at 10 feet bgs had TPHg concentrations of 4.5 mg/Kg. Concentrations of 290 mg/Kg TRPH from a depth of 5.5 feet bgs were encountered in the former crude oil tank area, while two samples from the old pump house area had concentrations of 230 mg/Kg and 220 mg/Kg at depths of 5.5 and 10.5 feet bgs, respectively. In Area 3, two samples indicated concentrations at 10 mg/Kg and 327 mg/Kg, respectively, at soil depths of 5.5 feet bgs. Concentrations decreased rapidly in the same locations where soil samples were drawn from depths of 10.5 feet bgs and indicated concentrations of 1 mg/Kg and 17 mg/Kg, respectively. These samples also indicate that PAHs are present in the soil's near-surface and are also related to oil and grease. Area 4 had a maximum TRPH concentration of 340 mg/Kg from a depth of 5.5 feet bgs. Area 5, which contains the existing USTs and the fuel island, reported 14 samples that showed concentrations of TRPH in a range of 16 mg/Kg to 1,200 mg/Kg found at depths of 1.5 to 15.5 feet bgs. The maximum level of 1,200 mg/Kg was detected between the fuel island canopy and the USTs. As described below, based on the Streamlined Risk Assessment, the concentrations of TRPH on-site require no remedial action.

Groundwater. According to the Phase II, TRPH concentrations found in Areas 1, 2, 4, and 5 do not indicate a threat to groundwater. However, in Area 3, fuel USTs are known to have been the source of petroleum impacts to groundwater. Since 1999, groundwater sampled from the fuel island area shows concentrations of petroleum hydrocarbons have been steadily decreasing indicating that the contamination mass is decreasing and is not adversely affecting the groundwater. No further analysis is required.

Fuel Oxygenates

Soil. Two samples within the project site showed concentrations of MTBE, one was within Area 3 and the second within Area 5. MTBE was detected at respective concentrations of 71 µg/Kg and 5.1 µg/Kg. As described below, based on the Streamlined Risk Assessment, the detections of MTBE on-site found during the Phase II investigation are not COPCs of significance.

Groundwater. According to the Phase II, due to the low concentrations of MTBE found in the soil samples, MTBE does not pose a significant threat to groundwater.[115] No further analysis is required.

[115] *MACTEC, Final Report of Phase II Environmental Site Assessment, April 15, 2004.*

Other Constituents

Groundwater. During the Phase II analysis, chloroform and 1,4-dioxane were found in isolated samples at low concentrations. These constituents are addressed by the Streamlined Risk Assessment, which is summarized below.

2004 Streamlined Risk Assessment

A Final Streamlined Risk Assessment was prepared for the Sunset Avenue project site in August 2004. The Streamlined Risk Assessment states that the USTs and potential groundwater impacts have been assigned case file number 902910151 by the LARWQCB. In discussions with the LARWCQB on March 8, 2004, several items were agreed upon: (1) the site is low priority based on LARWQCB review; (2) the LARWQCB wants to close the site and is to consider for complete closure, the groundwater monitoring data, the Phase II site assessment data, and the Streamlined Risk Assessment; and (3) the LARWQCB UST section would grant case closure if the COPCs are related to petroleum hydrocarbons. Based on the Phase II investigation and as summarized below in the analysis of environmental impacts, the Streamlined Risk Assessment has concluded that the site is deemed to be consistent with protective conditions for human health and the environment and a no-further-action (NFA) letter can be submitted for case number 902910151.[116]

(b) Underground and Aboveground Storage Tanks

Review of the Tyree report, as discussed in the Phase I, indicated that in February 1998, four single-wall steel USTs, including two 10,000-gallon diesel tanks, one 8,000-gallon motor oil tank, and one 6,000-gallon gasoline tank, were removed from the Division 6 bus facility.[117] These four USTs were removed from the area on the northwest side of the existing fuel station island on the east side of the site. In March of 1998, a 300-gallon diesel UST and a 2,000-gallon used oil UST were removed from the east side of the maintenance bay area. Similarly, in June 1998, a 500-gallon used oil UST was removed from the area located south of the maintenance bay area. These USTs were replaced with eight new, double-walled fiberglass USTs, consisting of two 10,000-gallon diesel tanks, one 8,000-gallon gasoline tank, two 5,000-gallon waste fuel/waste oil tanks, two 2,000-gallon motor oil and antifreeze/coolant tanks, and one 500-gallon diesel tank.

[116] *MACTEC, Final Report – Streamlined Risk Assessment. August 17, 2004.*

[117] *MACTEC, Phase I Environmental Site Assessment, March 5, 2004.*

(c) Asbestos and Lead

The Phase I Environmental Site Assessment identified that there were no detected levels of asbestos or lead found on-site. No further analysis was required.

b. Regulatory Framework

(1) Hazardous Substances

(a) Handling, Storage, and Transport

The handling and storage of hazardous materials is subject to Federal, State, and local regulations. At the local level, the LAFD monitors the storage of hazardous materials for compliance with the local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the appropriate fire department, which contains information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. In addition, employees and employees of contractors that handle hazardous wastes, or are potentially exposed to hazardous wastes, are required under Federal Occupational Safety and Health Administration (OSHA) (29 C.F.R. § 1910.120) and Cal/OSHA regulations to be trained and certified to handle hazardous waste and materials.

(2) Underground Storage Tanks

The storage of hazardous materials in underground storage tanks is regulated by the State Water Resources Control Board (SWRCB), which has delegated authority to the Los Angeles Regional Water Quality Control Board (LARWQCB) and typically on the local level to the Fire Department.

2. ENVIRONMENTAL IMPACTS

a. Methodology

Projects under CEQA review are evaluated by either the Department of Toxic Substance Control or the appropriate Regional Water Quality Control Board on a case-by-case basis to determine the risk associated with each constituent. The agency with project oversight determines the proper method for addressing any occurrence of contamination on a project site,

as necessary. Therefore, the analysis of the constituents that have been identified in the Phase I and Phase II reports on both the West Los Angeles Transportation Facility site and the Sunset Avenue site do not have specific regulatory thresholds.[118] However, should a project site require a Risk Assessment, then the constituents are compared to EPA Preliminary Remediation Goals (PRGs). This comparison ultimately determines whether there is a human health risk.

West Los Angeles Transportation Facility

Five documents were prepared for the Transportation Facility site regarding the potential for hazardous materials to occur on the project site. These documents include a Phase I Environmental Assessment, a Phase I Environmental Assessment Addendum, a Soil Assessment Report, a Phase II Site Assessment Report, and a Further Phase II Site Assessment Report. All five documents were prepared by Environmental Support Technologies, Inc., (EST) between June 12, 2003, and November 18, 2003. These documents, the contents of which are described in more detail below, were used to evaluate potential impacts associated with hazardous materials for both project sites.

Phase I and Phase I Environmental Site Assessment Addendum. For purposes of investigating the presence of potential environmental impacts on the project site, EST prepared the Phase I and Phase I Environmental Site Assessment Addendum based on the following information:

- Review of historical site records, maps, and photographs;
- Site reconnaissance;
- Review of recent documentation of local environmental degradation, focusing on soil and groundwater quality; and
- A search of regulatory databases.

Soil Assessment Report and Further Phase II Site Assessment. These documents were prepared pursuant to the findings of the Phase I Environmental Site Assessment and Addendum. EST conducted the investigations to assess the possible presence and extent of soil and groundwater contamination resulting from suspected on-site sources and from an apparent up-gradient ARCO gasoline service station gasoline groundwater plume. The Phase II and Further Phase II Site Assessment included the following field sampling program and methods:

[118] *Personal telephone conversation with Rebecca Chou, Los Angeles Regional Water Quality Control Board, July 21, 2004.*

- **Direct-Push Soil and Groundwater Sampling**: EST performed 11 direct-push soil borings. Two borings were advanced to total depths of 10 feet bgs to target oil in the hydraulic lift area. Four borings were advanced to total depth of 20 to 25 feet bgs to target oil and gasoline in the soil and gasoline hydrocarbons and fuel oxygenates in the groundwater. The remaining five borings were advanced to total depths of 20 to 25 feet bgs to target gasoline hydrocarbons and fuel oxygenates in the groundwater only.

- **Laboratory Analysis of Soil and Groundwater Samples**: Soil and groundwater samples were transported, under chain-of-custody, to a California-certified environmental laboratory for chemical analysis.

Soil Assessment Report. This document was also prepared in response to the findings of the Phase I Environmental Site Assessment. EST conducted the investigations to assess the potential impact of site usage on soils at selected suspect locations. The Soil Assessment Report included the following field sampling program and methods:

- **Direct-Push Soil Sampling**: Two borings were advanced to total depths of 10 feet bgs in the vicinity of the hydraulic lift area inside the garage. Two borings were advanced to total depths of 10 feet bgs in the vicinity of the former clarifier and two borings were advanced to total depths of 20 feet bgs in the area of the former chemical storage shed/storm drain inlet.

- **Laboratory Analysis of Soil Samples**: Soil samples were transported to a California-certified environmental laboratory for chemical analysis.

Sunset Avenue Project

Phase I Environmental Site Assessment. A Phase I Environmental Site Assessment ("Phase I") was undertaken for the project site. The purpose of the Phase I is to identify areas of environmental concern based on readily ascertainable information and subject property observations. The Phase I included the following assessments:

- **Geology, Surface Drainage, and Groundwater Flow Assessment:** Review of available information regarding geology, surface drainage, and groundwater flow within the project site area to identify possible pathways along which contaminants, if present, may migrate.

- **Site and Area Reconnaissance:** Documentation of observations of conditions on and near the site based on a site and area reconnaissance, which focuses on obvious

indications of activities that may have contaminated, or have the potential to contaminate, the site's soil or groundwater.

- **Historical Review:** Review of past activities that occurred on or near the project site to assess whether these past activities may have contaminated the site's soil or groundwater.

- **Regulatory Agency Lists Review:** Review of site-specific excerpts from lists published by environmental regulatory agencies for listed information on the project site or nearby properties that indicate known or suspected environmental concerns.

Phase II Final Report of Environmental Site Assessment. The Phase II investigation was designed to characterize subsurface environmental conditions in Areas 1 to 5 based on the historical use of the site and information discussed in MACTEC's Phase I Environmental Site Assessment. The Phase II included the following assessment:

- **Site History:** Prior to implementing the site assessment, MACTEC reviewed available documents from prior environmental investigations conducted on-site.

- **Field Activities:** Investigations conducted in the five predetermined areas of concern and their subsurface conditions were logged by the field geologist.

- **Analytical Results:** Analytical results from the soil vapor, soil, and groundwater samples collected during the on-site investigations.

- **Report Discussion:** Discussion and rendered opinions on the significance of the assessment results.

Streamlined Risk Assessment. In this Streamlined Risk Assessment, a variation of the National Research Council's paradigm that is used as an integral part of the Environmental Protection Agency (EPA) Superfund decision-making process has been used as the methodology. The methodology includes the elements of the site-specific data collection, exposure assessment, and toxicity assessment, which are then used to develop a risk characterization. The risk characterization includes an estimate of increased lifetime cancer risk (ILCR), with one in one million (1E-6 ILCR) as the acceptable limit for exposure and health hazard (as a hazard index, HI) along with a narrative description that includes an assessment of uncertainties to ensure that the process has been conducted conservatively for the protection of the public health.

This risk assessment's variation on that methodology includes comparing representative site concentrations (based on site-specific data collection) to risk-based concentrations (RBCs) that have been calculated for a particular type of land use using exposure assessment and toxicity

assessment, coupled with standard risk characterization. The EPA Region IX has published equations and descriptions for RBCs, called PRGs and has established standard PRG tables. A risk-based evaluation for chemicals of potential concern (COPCs) is used in place of PRGs where there is no published regulatory criteria.[119]

b. Thresholds of Significance

The following factors are set forth in the City of Los Angeles' *L.A. CEQA Thresholds Guide*, for consideration on a case-by-case basis in making a determination of significance:

(1) Risk of Upset/Emergency Preparedness

- Compliance with the regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design would reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

(2) Human Health Hazards

- Compliance with the regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Under a significant threshold that is based on these factors, the project would be considered to have a significant risk of upset/emergency preparedness or human health hazards impact if:

[119] *MACTEC, Final Report – Streamlined Risk Assessment, August 17, 2004.*

- It does not comply with applicable regulations regarding the handling and storage of hazardous materials or if it would consistently increase interference with existing emergency response capacity to the project area over existing conditions.

c. Analysis of Project Impacts

(1) West Los Angeles Transportation Facility

(a) Hazardous Substances

Based on the results of the site's exploration and laboratory analyses, EST has concluded that shallow soil impact by TRPH appears to be limited in lateral and vertical extent and can be removed or treated on-site and do not require remediation. Low detections of acetone in soil samples do not require further investigations as the existing constituents would naturally degrade.[120] Low isolated areas of soil and groundwater detections of TVPHg, aromatic hydrocarbons, and fuel oxygenates (i.e., MTBE and TAME) were detected in the general area of the municipal sewer line. Based on results from a site-specific soil assessment, it was determined that the sewer line is not the origin of the contaminants.[121] Hence, the origin of these contaminants is from an unknown source. Low concentrations of TVPHg, aromatic hydrocarbons, and fuel oxygenates in the soil or groundwater do not pose a significant risk to human health or the environment and do not warrant further assessment or remediation.

Although on-site uses have not resulted in significant impacts to soils or groundwater resources, the gasoline plume may result in an adverse impact on groundwater resources beneath the project site.[122] Remediation of the gasoline plume is on-going, but due to the northwest trending movement of the plume, groundwater beneath the site could be adversely affected by TRPH, MTBE, and aromatic hydrocarbons. As the plume is not related to the construction or operation of the site, and construction activities would not require deep excavation that would encounter the underlying groundwater, no adverse impacts from hazardous materials would result from development of the project. No impacts would occur.

[120] *Environmental Support Technologies, Inc., Soil Assessment Report, July 22, 2003.*

[121] *Environmental Support Technologies, Inc., Soil Assessment-Sewer Line/Sewer Vent, June 2, 2004.*

[122] *Telephone communication with Kirk Thompson, Registered Hydrogeologist and Environmental Assessor for Environmental Support Technologies, Inc., May 11, 2004.*

(b) Underground and Aboveground Storage Tanks

Development of the site would require the placement of several USTs and above-ground storage tanks in two general locations on the site. These would include the CNG fueling area and the maintenance bay area. Tank(s) to be placed in the CNG fueling area would be above-ground and specifically designed to hold the compressed gas at 3,000 or 3,600 pounds per square inch.[123] Tanks to be placed in the proximity of the maintenance bays would consist of new, double-walled fiberglass USTs for waste oil, new motor oil, new antifreeze/coolant, and waste antifreeze/coolant liquids. The number, size, and location of the tanks would be determined during the project's final design development.

Installation and maintenance of the USTs would comply with LARWQCB and LAFD regulations and guidelines established for the storage of hazardous material in underground storage tanks. Compliance with these regulations would reduce the probable frequency and severity of potential accidental release or explosion of a hazardous substance to a less-than-significant level.

(c) Human Health Risk of Upset

The project site would require the treatment of shallow soil impacts from TRPHs that are limited in lateral and vertical extent and can be removed or treated on-site. Should soils be removed or treated on-site, these efforts would comply with Federal Occupational Safety and Health Administration (OSHA) (29 C.F.R. § 1910.120) and Cal/OSHA regulations that require employees to be trained and certified to handle hazardous waste and materials. Compliance with OSHA and Cal/OSHA regulations would reduce the probable frequency and severity of consequences to people from exposure to these contaminated soils to less-than-significant levels.

(d) Emergency Response and Evacuation

As a Transportation Facility, the site would have higher than threshold quantities of hazardous materials as defined by Chapter 6.95 of the California Health and Safety Code. As a result of these levels of hazardous materials, the Transportation Facility would be required to file an Accidental Risk Prevention Program with LAFD, which would contain information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. In addition, employees and employees of contractors are required under OSHA and Cal/OSHA to be trained and certified to handle hazardous waste and materials. Compliance with these Federal and State regulations would reduce the probable

[123] *Alternative Fuels Data Center, www.afdc.doe.gov/altfuel/natural_gas.html, 2004.*

frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance to less-than-significant levels. Further, the Transportation Facility would develop and implement an Accidental Risk Prevention Program with LAFD, which would also reduce the project's potential to interfere with an existing response or evacuation plan to a less-than-significant level.

(2) Sunset Avenue Project

(a) Hazardous Substances and Human Health Risk of Upset

The COPCs tested for and identified in the Phase II investigation described above were analyzed in the Streamlined Risk Assessment. The risk assessment analyzed the potential health hazards related to human exposure to soil dust and vapors during construction of the project and during future operation of the site with residential and commercial uses. With regard to construction activities, the adult was assumed by the Streamlined Risk Assessment to work on the site for a short time (weeks to months) with an incidental soil ingestion rate of 480 mg/day. Residential PRGs were used to calculate the risk/hazard in construction worker exposure scenario. With regard to future use of the site, the Streamlined Risk Assessment assumed that adults and children would both be present. RBCs based on age-adjusted individual receptor information included a child exposure of 0 to 6 years and an adult exposure of 24 years.

The Streamlined Risk Assessment indicates that the detections of COPCs are predominantly related to petroleum hydrocarbons and the isolated detections of chlorinated hydrocarbons are insignificant by virtue of their concentration, low frequency of detection, and lack of connection to activities that have occurred on the site over the years. A summary of the findings of the Streamlined Risk Assessment with regard to the COPCs is provided below.

Soils

Volatile Organic Compounds (VOCs)

As stated in the Phase II discussion above, soil samples from Areas 2, 3, and 5 contained VOC concentrations that were further analyzed in the risk assessment. Table IV.E-3 on page 227 provides an example of how the detected soil concentrations from the Phase II were compared with residential soil PRGs as part of the Streamlined Risk Assessment. As concluded in the Streamlined Risk Assessment, the detections of VOCs found in soil over the site during the Phase II investigation do not support a residential exposure because they are scattered and isolated over the site and are much less than RBCs corresponding to acceptable limits for acceptable exposure of 1E-6 ILCR and 1.0 HI, which is the upper threshold criterion of acceptable exposure. Thus, based on the determination of the Final Streamlined Risk

Table IV.E-3

SUNSET AVENUE PROJECT
VOLATILE ORGANIC COMPOUNDS DETECTED IN AREA 3

COPC/VOCs	Detected Concentration in Soil (ug/kg)	Residential Soil PRG (ug/kg)
Ethylbenzene	13	8,900
M,p-xylenes	31	270,000
O-xylene	7.7	270,000
Isopropylbenzene	6.4	570,000
N-propylbenezene	24	240,000
1,3,5-trimethylbenzene	300	21,000
1,2,4-trimethylbenzene	800	52,000
Sec-butylbenzene	22	220,000
P-isopropyltoluene	28	Not listed
n-butylbenzene	84	240,000
Naphthalene	290	56,000
Tertiary-butyl alcohol	130	Not listed

Source: . MACTEC, Final Report - Streamlined Risk Assessment.

Assessment for VOCs in soil, there are no COPCs of significance and impacts would be less than significant

Polynuclear Aromatic Hydrocarbons – PAHs

According to the Phase II assessment, soil sample concentrations for PAHs, mostly related to oil and grease, in Areas 1, 2, and 5 were detected. The risk assessment summarized the individual detections obtained from 95 samples representing each of the five areas of the site. Table IV.E-4 on page 228 lists those results.

As shown in Table IV.E-4, detections of pyrene and fluoranthene in Areas 1, 2, and 5 are insignificant in comparison to PRGs. Similarly, the potential health hazard (HI) of 0.0002 is insignificant as it is much less than 1.0, the upper threshold criterion of acceptable exposure. In addition, soil samples from boring site CL8 are associated with single detections of Benzo(a)anthracene, Chrysene, Benzo(k)fluoranthene, and Benzo(a)pyrene, which are less than significant as their associated ILCR risk levels are less than the established 1E-6 ILCR.

Located 40 feet west of soil boring MB11, soil boring SV31 appears to be significant based on its detection concentration of 350 mg/kg. However, when compared to the risk-based concentration of 460 mg/kg for direct exposure, the HI of 0.8 indicates an acceptable exposure of less than 1.0 HI. Therefore, based on these analyses, PAHs do not contribute a significant risk/hazard and impacts would be less than significant.

Table IV.E-4

SUNSET AVENUE PROJECT
RISK-BASED SCREENING OF PAH RESULTS

Soil Boring #	Area	Sample Depth (bgs)	COPC/PAH	Concentration (mg/kg)	Residential PRG [d] (mg/kg)	Potential Contribution to Risk/Hazard: Risk (ILCR) [a]	Potential Contribution to Risk/Hazard: Hazard (HI) [b]
MB4	1	1	Pyrene	0.47	2,300	NA [c]	0.0002
MB6	1	1	Pyrene	0.44	2,300	NA	0.0002
MB6	1	1	Fluoranthene	0.43	2,300	NA	0.0002
MB10	2	1.5	Pyrene	0.47	2,300	NA	0.0002
MB11	2	1.5	Pyrene	0.46	2,300	NA	0.0002
MB11	2	1.5	Fluoranthene	0.42	2,300	NA	0.0002
CL8	5	14.5	Pyrene	1.4	2,300	NA	0.0006
CL8	5	14.5	Benzo(a)anthracene	1.3	0.62	2E-6	NA
CL8	5	14.5	Chrysene	1.5	62	2E-8	NA
CL8	5	14.5	Benzo(k)fluoranthene	1.3	6.2	2E-7	NA
CL8	5	14.5	Benzo(k)fluoranthene	1.4	0.62	2E-6	NA
CL8	5	14.5	Benzo(a)pyrene	0.88	0.062	1E-5	NA
SV31	Outside project boundary	4.5	Benzo(g,h,I)perylene	350	460[e]	NA	0.8

[a] *ILCR = increased lifetime cancer risk; HI = multiple-chemical or multiple hazard index (1.0 is the upper threshold of acceptable exposure)*
[b] *NA = not applicable for this data screening*
[c] *ILCR = increased lifetime cancer risk; HI = multiple-chemical or multiple hazard index*
[d] *PRGS = Preliminary Remediation Goals from EPA Region IX are used here for the streamlined risk-based evaluation*
[e] *California Regional Water Quality Control Board document, Application of Risk-Based Screening Levels and Decision Making to Sites with Impacted Soil and Groundwater, Volume 1: Summary Tier 1 Lookup Tables.*

Note: The CL8 sample at 14.5 feet bgs, exceeded the de minimis *exposure criteria of 1E-6 ILCR and 1.0 HI, thus it is not part of a surface soil (0-10 feet bgs) exposure scenario. Even so, the risk/hazard for sample CL8 at 14.5 feet bgs does not exceed the* de maximus *standards of the National Contingency Plan (EPA, 1990) for acceptable exposure of 1E-6 ILCR and 1.0 HI.*
Source: PCR Services Corporation.

Total Recoverable Petroleum Hydrocarbon (TRPHs) and Total Petroleum Hydrocarbons – Gasoline or Diesel (TPHg or TPHd)

According to the Phase II assessment, TRPH concentrations were found in all five areas of the site. Based on a maximum screening value of 8,000 mg/kg (see Table 2 of the Technical Appendix D-9: Draft Final Report Streamlined Risk Assessment), all Phase II detections of TRPHs or TPHs are well below this maximum threshold. No remedial action is indicated on a risk basis and no significant impacts would result.

Fuel Oxygenates

The Streamlined Risk Assessment reviewed the results of the Phase II and compared the detected levels of MTBE against the residential PRGs. MTBE at concentrations of 71 µg/Kg and 5.1 µg/Kg was detected in the Phase II soil samples at 15 feet bgs in Areas 3 and 5, respectively. These concentrations are well below the PRG of 17,000 µg/Kg corresponding to the 1E-6 ILCR. The Streamlined Risk Assessment further indicates that these small concentrations compared to the PRGs indicate that the detections are not significant for calculated risk/hazards. Thus, significant impacts associated with these detections would not occur.

Groundwater

Groundwater. As indicated above, selected data from the first quarter of 2004 from the groundwater monitoring wells and four additional grab groundwater samples were conducted for the Phase II.[124] Groundwater samples were analyzed for PAHs, herbicides, total cyanides, PCBs, and 1,4-dioxane. Chloroform was detected in Area 2 and Area 5. Chloroform is a colorless liquid with a pleasant, nonirritating odor and a slightly sweet taste that burns only when it reaches very high temperatures.[125] Also, at one location, in one groundwater sample, 1,4-dioxane was detected in Area 1. 1,4-dioxane is a colorless liquid with a faint, pleasant odor that is typically used as a degreasing agent.[126] PCBs were not detected in either the first quarter data or the four groundwater samples.[127]

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[124] *MACTEC, Final Report of Phase II Environmental Site Assessment, April 15, 2004.*

[125] *Agency for Toxic Substances and Disease Registry, www.atsdr.cdc.gov/tfacts6.html, 2004.*

[126] *State of California Office of Environmental Health Hazard Assessment, www.oehha.ca.gov/air/chronic_rels/pdf/123911.pdf, 2004.*

[127] *PCBs were widely used in transformer oil until it was discovered to be a potent carcinogen. California State University, Bakersfield, www.csubak.edu/~mevans/stowe/acronym.htm, 2004.*

According to the Streamlined Risk Assessment, the presence of the chloroform and 1,4-dioxane had no associated source(s) detected in the soil or soil vapor investigation. Chloroform sources cited in the United States Public Health Service Web Page (www.eco-usa.net/toxics/chcl3.shtml) indicates that usual sources of chloroform releases are chemical companies, paper mills, and wastewater from sewage treatment plants. None of those land uses are associated with the Metro Division 6 property. Thus, the Streamlined Risk Assessment concluded that based on current groundwater monitoring data and grab groundwater samples, there are no COPCs for organics in groundwater. In addition, the analysis within the Streamlined Risk Assessment indicates that none of the metals are COPCs for risk assessment of metals in groundwater. Therefore, significant impacts associated with COPCs in groundwater would not occur.

Summary of Potential Human Health Risk Impacts

Based on the above and as determined by the Streamlined Risk Assessment, potential receptors (i.e., adult workers, adults, and children) would not be subject to health hazards related to exposure from soil dust and vapors because there were no significant concentrations of COPCs to support a conclusion of an exposure scenario. As compared to the residential PRGs, significant concentrations of VOCs, PAHs, TPHs/TRPHs, or fuel oxygenates in the soils or groundwater resources were determined to not be present, or were at depths below California exposure thresholds. Thus, no significant human health risk impacts associated with construction or operation of the project site would occur.

(b) Underground and Aboveground Storage Tanks

Remediation of the Sunset Avenue site would require the removal of the eight existing USTs on-site in addition to the storage containers identified above in Table IV.E-1 on page 213. As discussed above, removal of the USTs would comply with LARWQCB and LAFD regulations. Further, the LARWQCB has granted case closure on all eight USTs on-site. The LARWQCB finds that Case No. 902910152 is in compliance with the requirements of subdivisions (a) and (b) of section 25296.10 of the Health and Safety Code and with corrective action regulations adopted pursuant to section 25299.3 of the Health and Safety Code and that no further action is required.[128] (See Appendix D-10 for a complete copy of the agency letter.)

[128] *California Regional Water Quality Control Board-Los Angeles Region, Underground Storage Tank Program Case Closure Division 6 100 Sunset Avenue, Venice (ID# 902910152), August 10, 2004.*

(c) Emergency Response and Evacuation

Once the site is cleared of existing USTs, hazardous materials, and contaminated soils and/or groundwater, the Sunset Avenue site would no longer have the potential for accidental release or explosion of a hazardous substance. Hence, preparation of the site and its redevelopment as a mixed residential and commercial project would no longer require the site to have an emergency response or evacuation plan and would not increase interference with existing emergency response capacity to the project area over existing conditions. No impacts would occur.

(3) Combined Impacts

Both the West Los Angeles Transportation Facility and the Sunset Avenue project sites have been determined to be candidates for case closure by the Los Angeles Regional Water Quality Control Board. Additionally, Sunset Avenue has officially received case closure as of August 10, 2004.[129] Neither site has significant levels of hazardous materials in either the soils or groundwater, thus, they would have no significant combined impacts.

3. CUMULATIVE IMPACTS

As EST has determined that the existing contaminated soils on the West Los Angeles Transportation Facility can be treated through removal or on-site treatment, development of this site would not contribute a cumulative impact related to exposure of people to a health hazard. However, operation of the project would require the daily use and storage of hazardous materials, which may, in connection to related projects, have the potential to contribute to a cumulative risk to people or property as a result of a potential accidental release or explosion of a hazardous substance. Of the 11 sites identified as related projects (see Section III.B, Table III-1, Related Projects, and Section IV.I., Transportation and Circulation) to the Transportation Facility, one other location has the potential to contribute to cumulative impacts related to hazardous materials. A 250,000-sq.ft. industrial project is planned within the City of Culver City to be located at 10100 Jefferson Boulevard. As an industrial use, there is potential for this related project to have hazardous materials on-site. Should this related project store higher than threshold quantities of hazardous materials as defined by Chapter 6.95 of the California Health and Safety Code, then this project would be required to file an Accidental Risk Prevention Program with the City of Culver City Fire Department, which would contain information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous

[129] *Ibid.*

materials handling and storage locations. Further, employees and contracted service providers who would potentially be exposed to hazardous waste would be required under OSHA and Cal/OSHA to be trained and certified to handle hazardous waste and materials. As this related project and the Transportation Facility would comply with these Federal and State regulations, the probable frequency and severity of cumulative consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance would be reduced to a less-than-significant level. Further, this related project and the Transportation Facility would develop and implement Accidental Risk Prevention Programs with the City of Culver City Fire Department and LAFD, respectively. Implementation of these Federal, State, and local requirements would also reduce the potential for the related project and the Transportation Facility to result in cumulative impacts that would interfere with existing response or evacuation plans to a less-than-significant level.

The Streamlined Risk Assessment has determined that TRPHs in the soils and chloroform and 1,4 dioxane in the groundwater are not present at significant levels, thus, there is no significant impact to human health or the environment. Further, the risk assessment has deemed the site a good candidate for case closure by the LARWQCB. Consequently, the LARWQCB has granted case closure on the Sunset Avenue site as of August 10, 2004. Redevelopment of the Sunset Avenue site would require the removal of the existing USTs and the stored hazardous materials (e.g., brake fluids, cleaning solvents, etc.) that exist on-site. Removal of these structures and hazardous materials could result in consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance. Additionally, related projects that may be developed during a similar timeframe, could result in the potential for a cumulative impact related to hazardous substances. Of the 21 identified related projects in proximity to the Sunset Avenue site (see Section III.B, Table III-2, and Section IV.I, Transportation and Circulation), one project has the potential to contribute to a cumulative impact. Within the City of Los Angeles, a gasoline station and mini-mart is proposed to be developed at 2005 Lincoln Boulevard. If developed concurrently, each site would potentially be handling and transporting hazardous materials and USTs. However, each site would comply with OSHA and Cal/OSHA regulations that require employees and contracted service providers to be trained and certified to handle hazardous waste and materials. Further, this related project would be required to develop and implement an Accidental Risk Prevention Program pursuant to Chapter 6.95 of the California Health and Safety Code and file with LAFD. The Accidental Risk Prevention Program would contain information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. Implementation of these Federal, State, and local requirements would reduce the potential for the related project and the Sunset Avenue Project from resulting in cumulative impacts that would result in an accidental release or explosion of a hazardous substance or interfere with existing response or evacuation plans to a less-than-significant level.

4. MITIGATION MEASURES

a. West Los Angeles Transportation Facility

Mitigation Measure WLA-E.1: Soils impacted with TRPH concentrations of 1,000 mg/Kg or greater shall be excavated during the grading for the proposed project. (This measure addresses impacts regarding soil contamination as discussed beginning on page 224 of this Section of the Draft EIR.)

b. Sunset Avenue Project

Although no significant impacts associated with emergency response and evacuation would occur, the following mitigation measure is proposed to ensure emergency response and excavation is not significantly impacted during construction of the project:

Mitigation Measure Sunset-E.1: A Transportation Plan shall be developed for the hauling of soils and debris from the project site.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

West Los Angeles Transportation Facility. Implementation of the mitigation measures identified above would clear the Transportation Facility site of the existing contaminated soils. Once removed, the project would reduce the frequency of exposure or severity of consequences to people of exposure to health hazards to a less-than-significant level.

Sunset Avenue Project. As described above, no significant impacts associated with hazards would result from construction or operation of the proposed Sunset Avenue project.

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
F. WATER QUALITY

The analysis of water quality presented in this EIR regards the West Los Angeles Transportation Facility only as it was determined in the Initial Study that redevelopment of the Sunset Avenue project would have beneficial surface and groundwater quality effects.

1. ENVIRONMENTAL SETTING

a. Existing Conditions

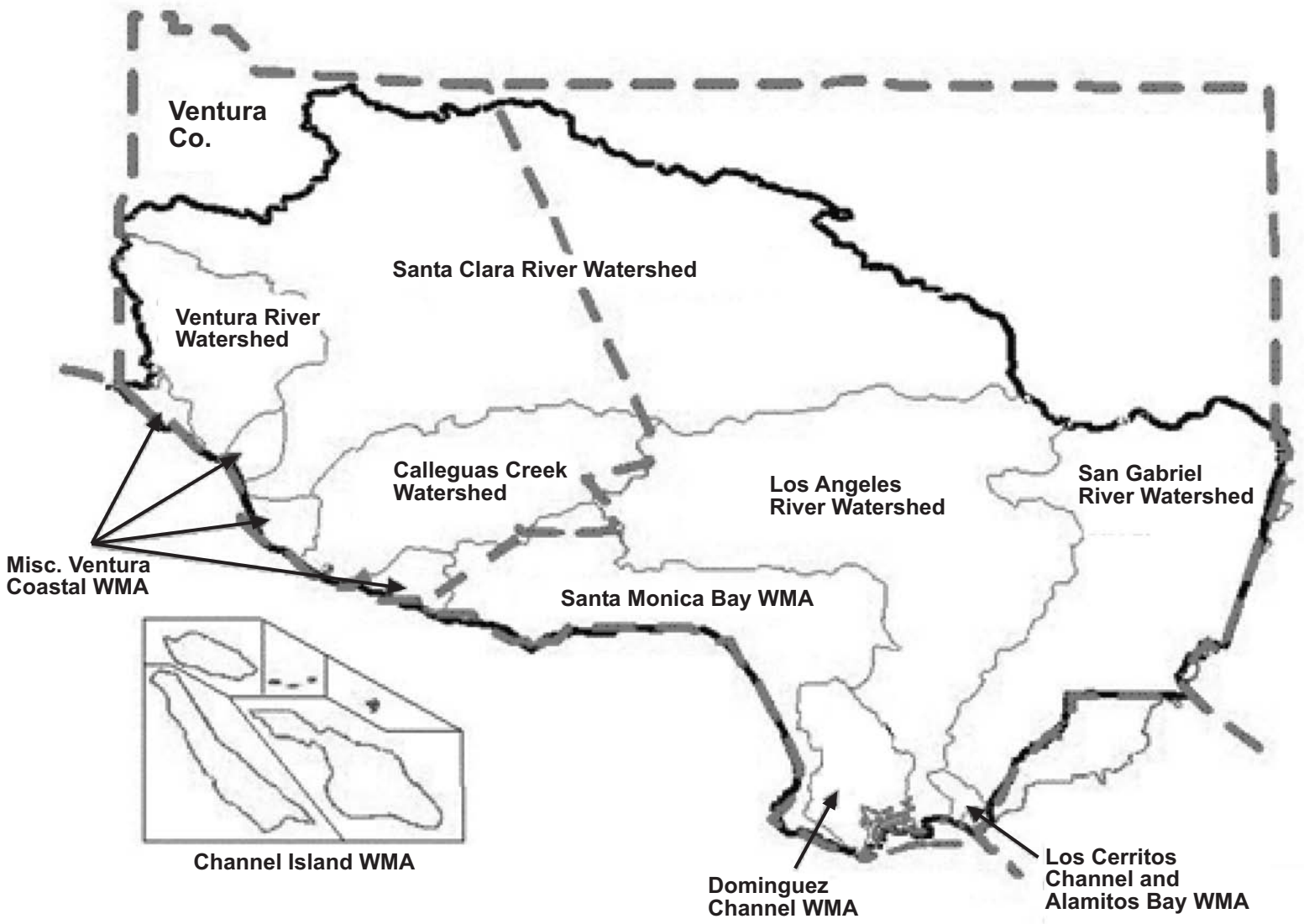
The project site is located in an industrial area within the West Adams-Baldwin Hill-Leimert Community of the City of Los Angeles, just east of the City's border with the City of Culver City. Vacant since approximately October 2001, the majority of the site is impervious with a few deteriorated structures remaining on-site from former light industrial uses. Ballona Creek, a large flood control channel which is one of two major surface water drainages in the Santa Monica Bay watershed, is located approximately 120 feet to the west of the project site. Runoff from the site discharges to Ballona Creek.

(1) Existing Surface Water Quality

The project site is located in the Santa Monica Bay Watershed Management Area (WMA).[130] As shown on Figure IV.F-1 on page 235 the Santa Monica Bay WMA covers the coastal areas of Los Angeles County, the Santa Monica Mountains, Downtown Los Angeles, and small portions of eastern Ventura County. Several major drainages are located within the Santa Monica WMA; one of the largest, the Ballona Creek, is located within the project area. In addition to Ballona Creek, other major and minor tributaries within the Santa Monica WMA drain the watershed's 414 square miles of undeveloped mountain areas, large acreage residential properties, and dense urban areas.[131]

[130] *State of California – California Environmental Protection Agency Los Angeles Regional Water Quality Control Board,* Santa Monica Bay Watershed Management Area, *December 2001.*

[131] *Los Angeles Regional Water Quality Control Board, Santa Monica Bay Watershed Management Area, December 2001.*



PCR

N

0 10 20 Miles

Scale in approximate miles

Source: Los Angeles Regional Water Quality Control Board, 2004

Figure IV-F-1
Los Angeles Region Watershed Management Areas

Management of the water resources within the Santa Monica Bay WMA is the responsibility of the Los Angeles Regional Water Quality Control Board (LARWQCB). The LARWQCB identifies the beneficial uses of the Santa Monica Bay WMA (WMA)'s resources, which are the foundation of the water quality protection measures under the Basin Plan.[132] Within this WMA, 19 of the 20 beneficial uses defined in the Basin Plan for the Region occur at some location in this watershed. The extensive list of beneficial uses is a reflection of the national significance of the Santa Monica Bay. Many organizations, both local and federal, have developed programs to help maintain the Santa Monica Bay's water quality. However, the quality of the Santa Monica Bay and its adjacent watersheds are under significant pressure to absorb over 575 permitted point source[133] dischargers and thousands of non-point source discharges.[134]

Point and non-point discharges from the Santa Monica WMA have collectively contributed to the contamination of the Santa Monica Bay, its watersheds, and its tributaries. Many of the surface waters in the Santa Monica Bay WMA do not meet the water quality standards established for the water's defined beneficial uses. Section 305(b) of the Clean Water Act requires preparation of a 303(d) list that defines what water bodies are impaired and for what pollutants. Once a water body is identified as impaired, the Clean Water Act requires that a Total Maximum Daily Load (TMDL) schedule be completed for each identified pollutant.

The TMDL is a number that represents the capacity a receiving water must absorb of various pollutants from the sum of all point and non-point sources and still meet water quality standards. The United States Environmental Protection Agency (USEPA) oversees the 303(d) program and either the USEPA or the State Water Resource Control Board (SWRCB) establishes the TMDL schedule for individual constituents. Once the existing individual constituent levels have been identified, a specific numeric waste load allocation (WLA) for point source discharges and Best Management Practices (BMPs) for non-point source discharges will be developed.[135]

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[132] *Los Angeles Regional Water Quality Control Board, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, 1994.*

[133] *Point Source: Storm water and waste water discharges from industrial or municipal operations such as chemical plants, wastewater treatment facilities, and power generating plants.*

[134] *Non-Point Source: Storm water or urban runoff that picks up and carries away natural and human-made pollutants, such as excess fertilizers from agricultural lands and residential areas; oil, grease, and toxic chemicals from urban roadways and finally depositing them into lakes, rivers, wetlands, coastal waters, and even our underground sources of drinking water.*

[135] *State of California – California Environmental Protection Agency Los Angeles Regional Water Quality Control Board, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, 1994.*

Finally, the Basin Plan will be amended and National Pollutant Discharge Elimination System (NPDES) permits will be revised to implement the WLAs and BMPs.[136]

The Ballona Creek just west of the project site is a 303(d) listed water body and would be the receiving water for storm water discharged from the West Los Angeles Transportation Facility site. According to the SWRCB's Water Quality Assessment Report, the creek is impaired due to coliform; trash, PCBs, and legacy pollutants, such as dichlorodiphenyltrichloroethane (DDT), chlordane, and dieldrin; and metals, such as lead, cadmium, copper, silver, arsenic, and tributyltin.

(2) Existing Groundwater Level

The Los Angeles Coastal Plain is divided into four groundwater subbasins: the Santa Monica, the West Coast, the Hollywood, and the Central. According to the Basin Plan, groundwater in the region has degraded significantly from its historic levels and quality.[137] However, according to the State of California Department of Water Resources (DWR), the West Coast Subbasin (Subbasin) within which the project site is located experienced a rise in groundwater levels of approximately 30 feet between 1961 and 1999.[138] Greater rises in groundwater levels have occurred in the El Segundo and Dominquez Gap areas of the West Coast Subbasin as a result of receiving approximately 19,665 acre-feet of annual recharge via injection wells for seawater intrusion abatement. Additionally, the West Coast Subbasin receives approximately 68,473 acre-feet of artificial recharge annually, primarily from subsurface inflows from the Central Basin.[139] Annually, approximately 51,673 acre-feet are extracted from the Subbasin for urban and agricultural uses.[140] Groundwater recharge and extractions from the West Coast Subbasin are operated and controlled by several water right holders, including DWR, the cities of Los Angeles and Santa Monica, and the California Water Company.

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[136] *Ibid.*

[137] *State Water Resources Control Board, Draft Strategy for Developing TMDLs and Attaining Water Quality Standards in the Los Angeles Region, December 2002.*

[138] *State of California Department o f Water Resources, www.groundwater.water.ca.gov/bulletin118/basin_desc/ index.cfm, 2004.*

[139] *Ibid.*

[140] *Ibid.*

In the project area, groundwater elevations are typically at depths of 30 feet bgs, but these levels vary depending on seasonal precipitation, irrigation, land use, and climatic conditions.[141]

(3) Existing Groundwater Quality

Agriculture, unsewered areas, and leaking underground storage tanks (LUSTs) have introduced inorganic compounds, nitrogens, pathogenic bacteria, and hazardous constituents into the region's groundwater basins. Additionally, seawater intrusion had also been a source of degradation to the coastal basins. Seawater intrusion has been brought under control over many years through the implementation of artificial recharge and injection barriers along the coast. Generally, groundwater is of good quality, but large plumes of saline water have been trapped behind the barriers created by the injection barriers. Further, due to the alluvial characteristics of the individual basins, there is potential for these saline plumes, and other pollutants, to migrate from one basin to another.[142]

The project site is located over the West Coast Subbasin of the Los Angeles Coastal Plain Groundwater Basin. The Subbasin is formed by fault zones that have created partial to major structural barriers to the Subbasin's groundwater movement. The Newport-Inglewood fault marks the subbasin's eastern boundary, which creates a seepage zone for groundwater movement between the Central Basin and the West Coast Subbasins. The quality of the water in the West Coast Subbasin varies both geographically and annually. Case in point, in the 2001 to 2002 fiscal year, the City of Los Angeles Department of Water and Power did not extract groundwater from the West Coast Subbasin due to poor water quality.[143] However, the water from the active groundwater wells is typically of good quality.

As part of an industrial area, the groundwater resources within the area are threatened by the industrial activities that have occurred in the past or by those present in the area today. LUSTs are known to have impacted the local groundwater in the past and those currently in active use pose the greatest potential to degrade groundwater in the project area.[144] Consequently, a gasoline hydrocarbon plume has been identified south of the project site, which has potential to migrate northward and contaminate groundwater beneath the project area.[145] The

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[141] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center, October 23, 2003.*

[142] *State of California – California Environmental Protection Agency and Los Angeles Regional Water Quality Control Board,, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, 1994.*

[143] *City of Los Angeles Department of Water and Power Urban Water Management Plan Fiscal Year 2001-2002.*

[144] *Environmental Support Technologies, Inc., Soil Assessment Report, July 22, 2003.*

[145] *Environmental Support technologies Inc., Phase I Environmental site Assessment Addendum, October 2003.*

plume could contaminate the groundwater beneath the project site with petroleum hydrocarbons and fuel oxygenates, such as methyl tert butyl ether (MTBE). The plume is currently being remediated per requirements of the LARWQCB.[146] For a more detailed discussion of groundwater contamination that has resulted from LUSTs and hazardous materials, please refer to Section IV.E., Hazardous Materials of this EIR.

b. Regulatory Framework

(1) Clean Water Act

Regulatory and permitting processes have been established to control the quality of water runoff from urban areas. In 1972, the Federal Water Pollution Control Act, also referred to as the Clean Water Act, was amended to state that the discharge of pollutants to waters of the United States from any point source is unlawful, unless an NPDES permit authorizes the discharge. The Clean Water Act was amended in 1987 requiring the United States Environmental Protection Agency (USEPA) to create specific requirements for storm water discharges. In response to the 1987 amendments to the Clean Water Act, the USEPA program required NPDES permits for: (1) Municipal Separate Storm Sewer System (referred to as a MS4s Permit) generally serving, or located in, incorporated cities with 100,000 or more people; (2) eleven specific categories of industrial activity (including landfills); and (3) construction activity that disturbs more than five acres or greater of land. As of March 2003, Phase II of the NPDES Program extends the requirements for NPDES permits to numerous small municipal separate storm sewer systems, construction sites of one to five acres, and industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from storm water permitting.

Section 402(p) of the Clean Water Act mandates that the MS4 permits must: (1) effectively prohibit the discharges of non-storm water to the MS4 except under certain provisions; and (2) require controls to reduce pollutants in discharges from MS4 to the maximum extent practicable (MEP), including Best Management Practices (BMPs), control techniques, system design, and engineering methods.

A MS4 Permit was issued to the County of Los Angeles and incorporated cities (with the exception of the City of Long Beach) by the LARWQCB in December 2001. To meet the MS4 Permit requirements, municipalities are required to implement the Storm Water Quality Management Program (SQMP) that was prepared as part of the Report of Waste Discharge

[146] *Telephone communication with Kirk Thompson, Registered Hydrogeologist and Environmental Assessor for Environmental Support Technologies, Inc., May 11, 2004.*

(ROWD) filed as part of the NPDES approval process. Pursuant to the SQMP, municipalities, including the City of Los Angeles, are required to conduct a variety of activities including, but not limited to, the following:

- Control discharges at commercial/industrial facilities through tracking, inspecting, and ensuring compliance at facilities that are critical sources of pollutants;
- Implement a development planning program for specified development projects;
- Implement a program to control construction runoff from construction activity at all construction sites within its jurisdiction; and
- Implement a public agency activities program.

In accordance with the MS4 Permit requirements, the City of Los Angeles has implemented several programs and activities, including the adoption of ordinances relating to storm water regulation and completion of a *Development Best Management Practices Handbook* regarding both construction (Part A) and planning (Part B) activities.

(2) Porter-Cologne Water Quality Control Act

California's primary statute governing water quality and water pollution issues is the Porter-Cologne Water Quality Control Act of 1970. The Porter-Cologne Act grants the State Water Resource Control Board (SWRCB) and RWQCBs broad powers to protect water quality and is the primary vehicle for implementation of California's responsibilities under the federal Clean Water Act. The Porter-Cologne Act further authorizes responsibility to the SWRCB and the RWQCBs to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites and to require cleanup of discharges of hazardous wastes and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil/petroleum products.

(3) Statewide General Construction Activity Permit

The NPDES General Construction Activity Permit (Order No. 99-08-DWQ), adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of equal or greater than one acre and less than five acres of total land area. This General Permit authorizes the discharge of storm water to surface waters from construction activities. It prohibits the discharge of materials other than storm water and authorized non-storm water discharges and all discharges that contain a hazardous substance in

excess of reportable quantities established at 40 Code of Federal Regulations (CFR) 117.3 or 40 CFR 302.4 unless a separate NPDES Permit has been issued to regulate those discharges.

Pursuant to the NPDES General Construction Activity Permit, all developers of land where construction activities will occur over one or more acres are required to:

- Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the U.S.;
- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP), which specifies BMPs that will reduce pollution in storm water discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards; and
- Perform inspections and maintenance of all BMPs.

In order to obtain coverage under the NPDES General Construction Permit, a project applicant must submit a Notice of Intent (NOI) to the SWRCB and prepare a SWPPP. BMPs from six categories must be covered within the SWPPP; they include: Erosion Control, Sediment Control, Tracking Control, Vehicle and Equipment Management, Material Management, and Waste Management. The SWPPP also must include a discussion of a program to inspect and maintain all BMPs.

(4) Industrial Storm Water Permit

The State Water Resources Control Board requires implementation of a NPDES Industrial Activities Storm Water Discharge permit (Order No. 97-03-DWQ) for addressing storm water pollution and prepare, retain on-site, and implement a SWPPP for use during the operational phase of the project. The General Industrial Permit requires the implementation of management measures that will achieve the performance standard of best available technology economically achievable and best conventional pollutant control technology and requires that an annual report be submitted each July 1.

(5) Standard Urban Storm Water Mitigation Plan

As part of the MS4 permit, the City of Los Angeles requires a permanent Standard Urban Storm Water Mitigation Plan (SUSMP) for the operation of the industrial development to ensure that storm water pollution is addressed through implementation of appropriate BMPs. The City of Los Angeles has incorporated these requirements into its *Development Best Management Practices Handbook* (*BMP Handbook*), *Part B Planning Activities*, Second Edition, adopted by

the City of Los Angeles Board of Public Works on August 26, 2002. Compliance with the requirements of this Manual is required by the City of Los Angeles' Ordinance No. 173,494.

The SUSMP requirements for an industrial development include: (1) reduction of peak storm water runoff discharge rates; (2) conservation of natural areas; (3) minimization of storm water pollutants of concern; (4) protection of slopes and channels; (5) provision of storm drain stenciling and signage; (6) properly designed outdoor material storage and trash storage areas; (7) provision of proof of ongoing BMP maintenance; and (8) designing standards for structural or treatment control BMPs. In addition, project applicants for these projects will be required to select source control and, in most cases, treatment control BMP(s) from the list approved by the RWQCB and included in the SUSMP. In combination, these treatment control BMPs must be sufficiently designed and constructed to treat, infiltrate, or filter storm water runoff from either:

- the 85th percentile 24-hour runoff event determined as the maximized capture storm water volume for the area, from the formula recommended in *Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998),* or
- the volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in *California Storm Water Best Management Practices Handbook – Industrial/ Commercial, (1993),* or
- the volume of runoff produced from a 0.75-inch storm event, prior to its discharge to a storm water conveyance system, or
- the volume of runoff produced from a historical-record based reference 24-hour rainfall criterion for "treatment" (0.75-inch average for the Los Angeles County area) that achieves approximately the same reduction in pollutant loads achieved by the 85th percentile 24-hour runoff event.

2. ENVIRONMENTAL IMPACTS

a. Methodology

(1) Surface Water Quality

A literature review of applicable State, regional, and local surface water quality publications and documentation was completed to determine the potential for the proposed

project to result in an impact to receiving water bodies. Impacts were determined based on a comparison of the existing conditions of the project site with the proposed use of the site and design of the project. Other factors considered in this evaluation include the size of the project site as a percentage of the entire watershed, the predominant land uses in that watershed, and the percentage of impervious surfaces that would generate urban runoff from the site subsequent to implementation of the proposed improvements. Literature references employed in this assessment are in Section VIII., References and Acronyms, of this EIR

(2) Groundwater Level and Quality

To assess the potential impacts to groundwater level and quality, current and relevant State, regional, and local documents and publications were reviewed. Based on the proposed changes between existing and future conditions, determinations were made concerning the project's potential to result in impacts to groundwater resources. Factors considered in making these determinations included the historic and existing groundwater levels and the rate at which groundwater recharge (active and passive) and extraction effect current levels. Also considered were the effects that contaminants generated from various land use can have on groundwater quality. Please refer to Section VIII., References and Acronyms, for a list of the literature sources employed in this assessment of groundwater level and quality. These analytical methodologies were used in conjunction with the following threshold criteria to determine if the project would result in adverse impacts to drainage or water quality.

b. Thresholds of Significance

Based on the City of Los Angeles' *L.A. CEQA Thresholds Guide*, an impact would result if any of the following thresholds were met:

(1) Surface Water Quality

- A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES storm water permit or Water Quality Control Plan for the receiving water body.

(2) Groundwater Level

- Change potable water levels sufficiently to:

- Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought;
- Reduce yields of adjacent wells or well fields (public or private); or
- Adversely change the rate or direction of flow of groundwater; or

☐ Result in demonstrable and sustainable reduction of groundwater recharge capacity.

(3) Groundwater Quality

☐ Affect the rate or change the direction of movement of existing contaminants;

☐ Expand the area affected by contaminants;

☐ Result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion); or

☐ Cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations (CCR), Title 22, Division 4, Chapter 15 and in the Safe Drinking Water Act.

c. Analysis of Project Impacts

(1) Construction

Surface Water Quality. Construction of the project would first require the demolition and the clearing of the entire 4.66-acre site. Clearing of the site would expose all underlying soils to potential erosion or transportation via storm water into nearby storm drains. Additionally, construction activities and exposure of construction materials can lead to storm water pollution. According to the City of Los Angeles' *BMP Handbook*, several BMPs would be implemented to ensure the prevention of water pollution. BMPs that may be utilized on the project site include, but are not limited to, proper scheduling to avoid the rainy season, proper storing and covering of paving materials, stabilizing entrance areas with aggregate, and utilizing off-site fueling of construction vehicles. Adherence to the BMPs required by the NPDES General Construction Activity Permit and those identified in the SWPPP associated with the permit, would reduce the potential for construction materials and soils exposed during the grading and construction process from being transported off-site and into nearby storm water drainage infrastructure. Hence, through construction scheduling, proper use and maintenance of BMPs, and compliance with SWPPP guidelines, the project would not violate regulatory

standards as identified in the NPDES permit or the Basin Plan for storm water discharges to receiving waters.

Groundwater Level. During the construction phase of the Transportation Facility project, no groundwater resources would be used for the site's development, nor is the site designated as an active groundwater recharge area by either the City of Los Angeles or the State of California Department of Water Resources. Further, preparation of the site would include a minimal amount of remedial grading sufficient to remove root systems of established fallow vegetation and the organic topsoil, while some portions of the site would require recompaction of existing soils.[147] However, as groundwater levels are typically at 30 feet bgs, grading and site preparation would be performed well above existing groundwater levels. Therefore, construction of the project would not adversely affect yields of adjacent wells or interfere with a water utility provider from recharging or accessing groundwater resources used for public supply. Additionally, as the project would not have subterranean structures (e.g., parking facilities), the project would have no potential to interfere with groundwater direction or flow. Albeit, the project would include several underground storage tanks for petrochemicals and other fluids, these tanks are neither large enough nor situated deep enough to interfere with groundwater movement beneath the project site. Therefore, construction of the project would have no adverse impacts on groundwater levels within the West Coast Subbasin.

Groundwater Quality. Construction activities for the project would generally consist of at-grade or above-grade construction. However, site preparation for either portions of the site or the entire site would require excavation and recompaction of soils at a depth of 10 to 25 feet.[148] As groundwater levels below the site are generally 30 feet below ground surface (bgs), it is not anticipated that groundwater would be exposed to the surface during the construction phase. Hence, groundwater would not be susceptible to contamination from construction activities or materials. Additionally, implementation of required BMPs – such as covering of stockpiled materials, proper cleanup of accidental spills, and proper containment and storage of hazardous materials – would ensure that groundwater resources would not be adversely affected by construction activities or materials that have the potential to percolate through the soils into the groundwater resources. Therefore, construction activities would not expand or change the movement of existing groundwater contaminants nor would it result in increased groundwater levels. Further, the site does not have existing or proposed water production wells on-site and the project would have no direct adverse impact on water quality as defined by the California Code of Regulations (CCR), Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Hence, construction of the project would not result in significant impacts to groundwater quality.

[147] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Center, October 23, 2003.*

[148] *Ibid.*

(2) Operation

Surface Water Quality. Under the NPDES General Industrial Activities Permit, its associated SWPPP, and the City of Los Angeles' SUSMP would focus on the major task of eliminating unauthorized non-storm water discharges to the facility's storm drain system. In the case of this project, waters from rinsing and washing vehicles in the proposed bus and chassis wash bay would be considered unauthorized storm water discharges by the RWQCB. As wash waters tend to be conveyed through floor drains, the project's design needs to eliminate direct connections between the conveyance systems and the storm drains. As required by the permit, either these unauthorized discharges are to be treated on-site or the operator must obtain a separate NPDES permit for their discharge. In addition to bus and chassis washing on-site, the project proposes to have a CNG fueling station, bus maintenance bays, trash and vacuum containers, and open surface parking for both buses and employee vehicles. The City of Los Angeles *BMP Handbook, Part B,* has identified specific BMPs that have been developed by the Los Angeles RWQCB and the Los Angeles Stormwater Program to reduce the impacts on storm water from these specific uses. BMPs that may be incorporated into the SUSMP to address each of the project features identified above include: clarifiers for wash areas, elevated concrete pads for fueling stations, covered repair/maintenance bays to prevent storm water run-on, properly designed outdoor trash storage areas, and vortex separators for oil and grease runoff from parking lots. Additionally, the project would incorporate a reclamation area adjacent to the two bus washers that would recycle bus-washing waters to be reused on-site. Implementation of required BMPs as defined by the NPDES Industrial Permit/SWPPP and specific BMPs to satisfy SUSMP requirements would reduce the potential for project related operational activities from creating sources of pollution that could contaminate storm water runoff.

A final requirement of the Industrial Permit is the development of a Monitoring Program for the project. The Monitoring Program will meet three objectives: (1) assess the operator's compliance with the General Industrial Activities Permit; (2) aid in the implementation of the SWPPP; and (3) measure the effectiveness of the BMPs that have been developed for purposes of storm water pollution prevention. Further, the site's operators are required to perform visual observations of authorized storm water discharges and collect samples of these discharges to be analyze. These storm water analyses must include pH, total suspended solids (TSS), total organic carbon (TOC), specific conductance, toxic chemicals, and other pollutants, which are likely to be present in storm waters discharged from a bus maintenance and service center. Should the analyses of the waters identify that pollutants exceed established water quality thresholds, all BMPs associated with treatment of each identified pollutant would be evaluated. Should it be determined that the existing BMPs are inadequate to treat storm water or nuisance water runoff for their specific pollutant, the operator would be required to replace the BMPs and update the SWPPP.

Compliance with the requirements of the State NPDES Industrial Activities Permit and SWPPP, along with the City of Los Angeles' SUSMP would ensure that the project's operational activities, the type and placement of BMPs, and monitoring of the site's storm water runoff would result in no significant impact on water quality.

Groundwater Level. During the operational phase of the project, the majority of the 4.66-acre site would be covered by impervious surfaces. This would act as an effective barrier between storm water and other nuisance waters from percolating into the soils. By barring percolation, the potential for waters from the site to reach groundwater resources would be eliminated. As this is not a significant change in relation to the site's existing impervious conditions, impeding percolation of storm and/or nuisance waters would not result in an adverse effect on groundwater recharge. Additionally, water to be used on-site would be delivered via water utility lines provided by the City of Los Angeles Department of Water and Power. No direct use of groundwater resources would occur on the project site. Therefore, the project would have no adverse impacts on groundwater levels.

Groundwater Quality. Once the project is operational, the site would consist of three dominate features, the Administrative and Maintenance building, the auxiliary facilities and the paved parking areas for the buses and employees. Hence, the site would be predominately impervious and would allow little or no percolation of storm or nuisance waters from the project site. Therefore, the potential for waters from the site to percolate into the soils and migrate down to the underlying groundwater would be eliminated. Further, BMPs that would be installed on-site, in compliance with the State SWPPP and the City of Los Angeles' SUSMP, would capture and treat potentially contaminated runoff from the site before it is discharged to the storm water system. Therefore, the project would have no significant impact on groundwater quality.

However, the project does propose to install underground storage tanks (USTs) that would hold oils (both new and used) and other potentially hazardous materials. Maintenance and monitoring of the project's USTs to prevent leaks or spills that have the potential to adversely affect groundwater resources is discussed in Section IV. E., Hazardous Materials.

3. CUMULATIVE IMPACTS

Section IV.I, Transportation and Circulation, identifies eleven related projects within proximity of the proposed West Los Angeles Transportation Facility site. The eleven projects fall into one of four categories: industrial, transportation, office, or residential. These urban development projects could potentially contribute point and non-point source pollutants to the surface or groundwater resources, resulting in a cumulative impact to water quality. However, all of the related projects would also be subject to State NPDES permit requirements for both

construction and operation, including developing SWPPPs. Development of SUSMPs is dependant on a project's location within the City of Los Angeles. Regardless of location, each project would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to surface and groundwater quality. Thus, cumulative impacts to water quality would be less than significant.

4. MITIGATION MEASURES

The proposed project would comply with all standards, guidelines, and requirements of the State NPDES Construction Activities and Industrial Permits, and City of Los Angeles requirements as part of these regulations. The SWPPP and a SUSMP would be developed specifically for the project site to address the individual characteristics of the site's needs to treat potential storm water contamination. Compliance with these requirements is mandated by law to ensure that impacts to surface and groundwater quality are reduced to less than significant levels. As such, these permits, plans, and BMPs are not considered to be mitigation measure, but integral parts of the project design and operation. Therefore, no mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with regulatory requirements would ensure that significant impacts to water quality would not occur as a result of the project, and no mitigation measures are required.

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
G. LAND USE

1. ENVIRONMENTAL SETTING

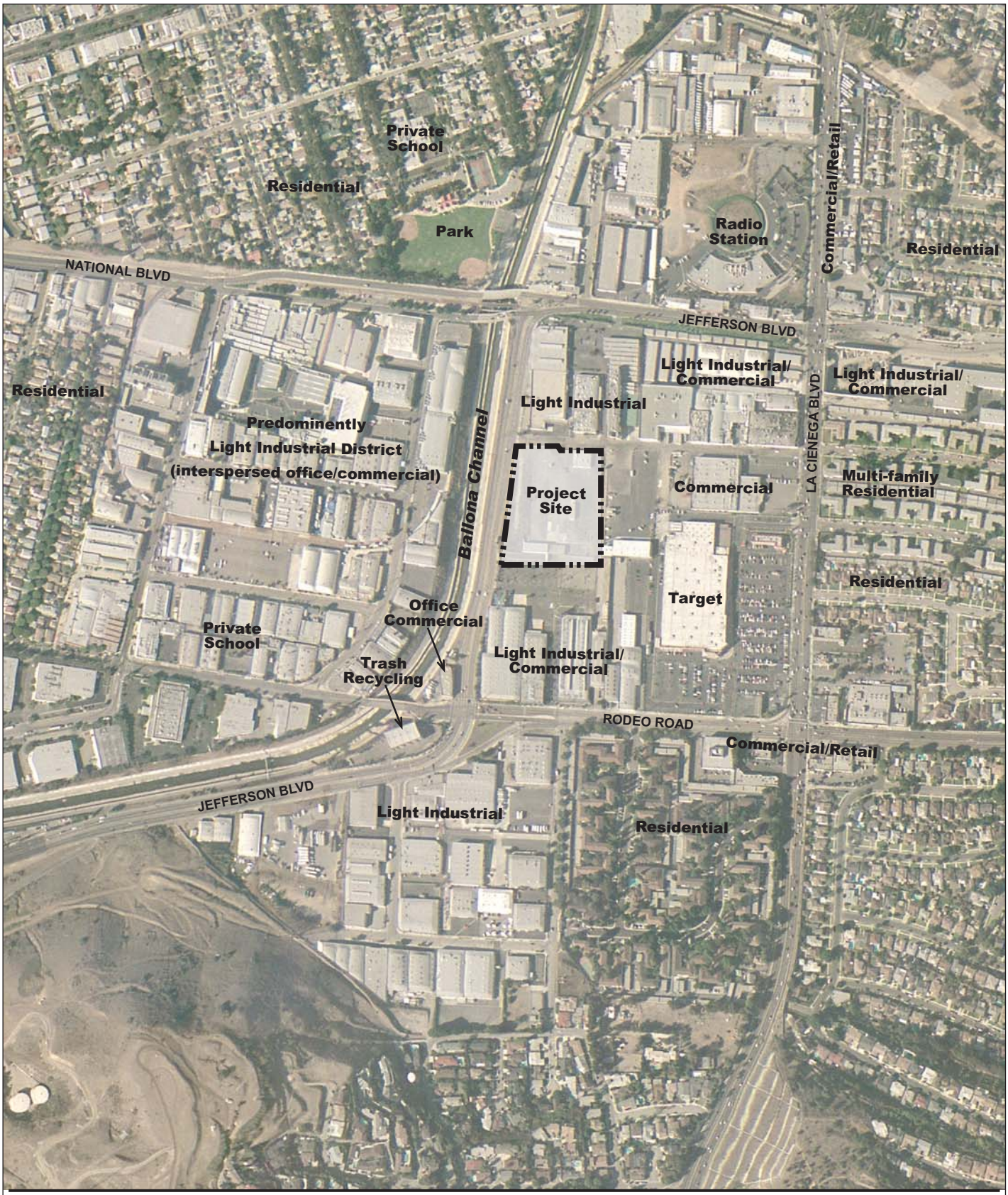
a. Existing Conditions

West Los Angeles Transportation Facility. The project site is located within an industrial area in the West Adams-Baldwin Hills-Leimert Community of the City of Los Angeles. While actually addressed on La Cienega Boulevard, this 4.66-acre property's primary street frontage is on Jefferson Boulevard, approximately 120 feet east of the Ballona Creek Flood Control Channel that flows through this area. The Channel demarcates the boundary between the City of Los Angeles and the City of Culver City on the west side of the Channel.

This property is presently vacant and was previously used for light industrial purposes from which a few deteriorated structures remain. Surrounding land uses are identified on Figure IV.G-1 on page 250. The site is surrounded by light industrial and commercial land uses to the north, south, and east. Light industrial uses are also present on the west side of Ballona Creek in the City of Culver City. The industrial uses in this area are delineated by large, one- to two-story buildings with open parking lots. Small commercial centers, with single-level buildings are interspersed along arterial corridors, and large commercial facilities east of the project site follow the industrial building design of one- to two-story buildings with open parking lots and varying exterior façades.

Residential uses are located around the periphery of this industrial area, with the closest residences situated 700 feet south in the Cameo Woods development in the City of Los Angeles. Other nearby residential uses include the Blair Hills neighborhood in the City of Culver City, located approximately 1,900 feet south and the Baldwin Hills neighborhoods, located 1,800 feet south-southeast of the project site within the City of Los Angeles. Also in the City of Culver City, the Rancho Higuera neighborhood is located approximately 1,800 feet to the west of the project site, and the McManus Park (Syd Kronenthal Park) Neighborhood is located approximately 1,200 feet to the northwest.

Sunset Avenue Project. This 3.13-acre project site is located in the western part of the Venice Community of the City of Los Angeles. The site encompasses an entire City block bordered by Pacific Avenue to the west, Main Street to the east, Sunset Avenue to the north, and Thornton Place to the south. On-site there are a few administration buildings with the majority



PCR

Not to scale

Source: Landiscore, 2004

Figure IV.G-1
West Los Angeles Transportation Facility Surrounding Land Uses

of the site paved for use as a bus maintenance and operations yard and parking lot for employees. The perimeter is enclosed with opaque fencing and, in places, screening vegetation.

Surrounding land uses are identified on Figure IV.G-2 on page 252. Main Street, on the eastern side of the project, demarcates a change in the use characteristics of the area. Development west of Main Street, uses located to the north, south, and west of the project site, contains small-lot single- and multi-family residential properties. Residential development extends westward toward the boardwalk and beach, creating a beach-oriented residential neighborhood with relatively high density.

Across Main Street, to the east, properties are in transition. Between Rose Avenue, to the north, and Abbot Kinney Boulevard, to the south, properties formerly in light industrial usage are being absorbed in new residential and commercial development. A new multi-family development is currently under construction on one site and another entitled for subsequent development on the other are directly across the street from the project site, as is a commercial parking lot. The Main Street commercial/retail corridor, with restaurants, shops, etc., is located approximately 900 feet north of the project site. Abbot Kinney Boulevard, located approximately 500 feet south of the project site, contains many community-serving commercial uses.

The existing land uses reflect the area's history and on-going transition. Development patterns, particularly west of Main Street, date back to the turn of the last century when the project site served as the end-stop of the trolley-line that extended from the then Los Angeles development (centered in the downtown area) to the beach. Development included small subdivisions, often serving as second homes that supported the boardwalk, piers, and beach activities to the west. Somewhat dense development on small lots reflects a design that precedes the automobile as a shaper of urban form. Pedestrian-ways are emphasized and parking is limited.

Development east of Main Street reflects a later period of initial development with the establishment of distinct districts, light-industrial, residential, etc., and more of an orientation toward automobile use. Over the years, varied economic conditions and development interests have seen variations in the initial development patterns on a more parcel-by-parcel, use-conversion basis. This resulted in the current use mix that reflects different styles and eras.

Current development activities reflect an emergence of the area from somewhat depressed conditions occurring during the mid-to-later part of the last century. New development in the area includes the addition of new higher density residential projects, with-onsite parking, and the emergence of Main Street and Abbot Kinney Boulevard, as desirable locations for community-serving (especially retail) services.

PCR

Not to scale

Figure IV.G-2
Sunset Avenue Project
Surrounding Land Uses

Source: Landiscor, 2004

b. Regulatory Framework

(1) Regional

The two projects are both located within the boundaries of the South Coast Air Quality Management District (SCAQMD), the Southern California Association of Governments (SCAG), and the area served by the Metropolitan Transportation Authority's Congestion Management Program, 2001 Long Range Transportation Plan for Los Angeles County, and 2003 Short Range Transportation Plan for Los Angeles County.

(a) Air Quality Management Plan

The two project sites are located within the South Coast Air Basin (the Basin), subjecting both to policies set forth by the SCAQMD. The SCAQMD, in conjunction with SCAG, is responsible for establishing and implementing air pollution control programs throughout the Basin. The SCAQMD's AQMP, last amended in 1999, presents strategies for achieving the air quality planning goals set forth in the Federal and California Clean Air Acts (CCAA), including a comprehensive list of pollution control measures aimed at reducing emissions. Specifically, the AQMP proposes a comprehensive list of pollution control measures aimed at reducing emissions and achieving ambient air quality standards. Further discussion of the AQMP can be found in Section IV.B Air Quality, of this EIR.

(b) Regional Comprehensive Plan and Guide

The project sites are also located within the six-county region that comprises the SCAG planning area. SCAG is a Joint Powers Agency with numerous roles and responsibilities relative to regional issues that cross jurisdictional boundaries. SCAG's responsibilities have included preparation of the Regional Comprehensive Plan and Guide (RCPG) in conjunction with its constituent members and other regional planning agencies.[149] The RCPG is intended to serve as a framework for decision-making with respect to the growth and changes that can be anticipated by the year 2015 and beyond. It provides a general overview of the plans of the various regional agencies that will affect local governments, or that respond to the significant issues facing Southern California, including growth management, and regional mobility. In addition, the RCPG proposes a voluntary strategy for local governments to use in addressing issues related to future growth and in assessing the potential impacts of proposed development projects within the

[149] *Major portions of the Plan (e.g., the Growth Management Section) were originally approved in 1994 and reprinted in the 1996 version.*

regional context. For planning purposes, this area is divided into 14 subregions. The project sites are both located within the City of Los Angeles subregion.

The RCPG includes five core chapters (Growth Management, Regional Mobility, Air Quality, Water Quality, and Hazardous Waste Management) that respond directly to the federal and state requirements placed on SCAG and form the basis for certification of local plans. Ancillary chapters within the RCPG (Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Waste Management) reflect other regional plans but do not contain actions or policies required of local governments.

Adopted policies related to land use are contained primarily in Chapter 2, Growth Management, of the RCPG. Related policies are also included in the Regional Mobility Element. The purpose of the Growth Management chapter is to present forecasts that establish the socio-economic parameters for the development of the Regional Mobility and Air Quality chapters of the RCPG and to address issues related to growth and land consumption. These parameters encourage local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, protect natural resources, and enhance the quality of life in the region.

In its response to the Notice of Preparation regarding the Sunset Avenue Project, SCAG indicated that the Sunset Avenue Project would not be a regionally significant project. Nonetheless, the following policies included in the Growth Management chapter, and Subgoals listed in the Regional Mobility Chapter are relevant to both proposed projects.

From the Growth Management Chapter:

- Support local jurisdiction efforts to minimize cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services;
- Encourage local jurisdiction plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.
- Support local jurisdiction strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors;
- Support and encourage settlement patterns which contain a range of urban densities;

- Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.

From the Regional Mobility Element:

- Actively support development and deployment of clean fuel/alternative fuel technologies for the region's vehicles.
- Actively support conversion of existing vehicles to clean fuel/alternative fuel.
- Encourage land-use development patterns that complement transportation investments.

(c) Congestion Management Program

The Los Angeles County Metropolitan Transportation Authority (Metro) administers the Congestion Management Program (CMP), a state-mandated program designed to address the impact urban congestion has on local communities and the region as a whole. The CMP, revised in 2002, includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model to evaluate traffic congestion and recommend relief strategies and actions. The primary goal of the CMP is to reduce traffic congestion in order to enhance the economic vitality and quality of life for affected communities. CMP guidelines specify that those freeway segments, where a project could add 150 or more trips in each direction during the peak hours, be evaluated. The guidelines also require evaluation of all designated CMP roadway intersections where a project could add 50 or more trips during either peak hour. The CMP is discussed further in Section IV.I, Transportation and Circulation.

In addition, Metro prepares long- and short-range plans for the future provision of transit services. The 2001 Long Range Transportation Plan for Los Angeles County and the 2003 Short Range Transportation Plan for Los Angeles County are the most recently approved plans. These plans identify needed bus service improvements, including facility modification to meet the transit needs of the County.

(2) Local Level – City of Los Angeles

Both of the proposed projects are located within the City of Los Angeles and are subject to regulation under the City's General Plan and related implementation ordinances and zoning regulations. The City's General Plan includes the General Plan Framework Element, and 35 Community Plans that address the application of City-wide policies to the local level. The City has also adopted Land Use Policies/Plans for areas located within the California Coastal zone that address coastal issues pursuant to the California Coastal Act.

The City of Los Angeles General Plan Framework (Framework), adopted in December 1996 and readopted in August 2001, provides general guidance regarding land use issues for the entire City of Los Angeles. The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines citywide polices regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services.

As part of the City of Los Angeles General Plan, the Community Plans are intended to provide an official guide for future development and propose approximate locations and densities of land use. The Community Plans provide standards and criteria for the development of housing, and commercial and industrial uses, as well as circulation and service systems. The plans consist of text and an accompanying generalized land use map. The Community Plan text expresses goals, objectives, policies, and programs. The Community Plan map outlines an arrangement of land uses with respective intensities, the street system and the locations and characteristics of public service facilities.

The City implements its plan policies through a variety of mechanisms including Specific Plans that provide regulations for certain local areas, and through regulations in the City's Municipal Code that address areas and issues not otherwise addressed in Specific Plans. The following discussion addresses the City Plans and regulations that are applicable to each of the proposed project sites.

(a) West Los Angeles Transportation Facility

Framework Element. The City's Framework element generally addresses the types and location of development within the City. However, it also includes policies regarding the provision of transportation services and infrastructure. To the extent the proposed Transportation Facility supports improved bus circulation services, the center would be an indirect means for facilitating the large range of policies regarding enhancement of bus service; e.g., increasing bus service along high-demand routes and corridors and in corridors not served

by the funded rail system. Policies in Chapter 8 of the Framework that are more directly related to the proposed Transportation Facility Project include the following:

8.1.5 Actively pursue demonstration projects to test the implementability and effectiveness of new, innovative transit services.

8.1.6 Seek maximum opportunities for entrepreneurial services and other private-sector initiatives when developing community-level accessibility plans.

8.1.7 Provide improved transportation services to support Citywide economic development activities and related economic revitalization initiatives.

8.2.18 Continue transit restructuring studies and other inter-agency efforts to reduce the cost and enhance the effectiveness of transit service.

8.6.8 Work with regional agencies to reduce the cost of bus operations and increase operating revenues.

8.6.9 Implement procedures to achieve fair-share participation of the private sector in financing transportation improvements.

West Adams-Baldwin Hills-Leimert Community Plan. The Transportation Facility is located within the boundaries of the West Adams-Baldwin Hills-Leimert Community Plan. Land use designations for the project site and surrounding areas are shown on Figure IV.G-3 on page 258. As indicated, the site and areas to the north and south are designated for industrial use, and the area behind the project site to the east is designated for commercial use.

The Community Plan includes two objectives regarding industrial land:

1-1 To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the Community.

1-2 To retain industrial plan designations to maintain the industrial employment base for Community residents and to increase it whenever possible.

City of Los Angeles Municipal Code. The Transportation Facility is not located within the boundaries of a Specific Plan. Land use regulations are provided in the City's zoning ordinance and in the Municipal Code. The site is zoned MR1-1VL. MR1 is a designation for restricted industrial use. 1VL is a density/height designation indicating a maximum floor area ratio (FAR) of 1.5:1 and maximum height of three stories or 45 feet for non-residential uses.

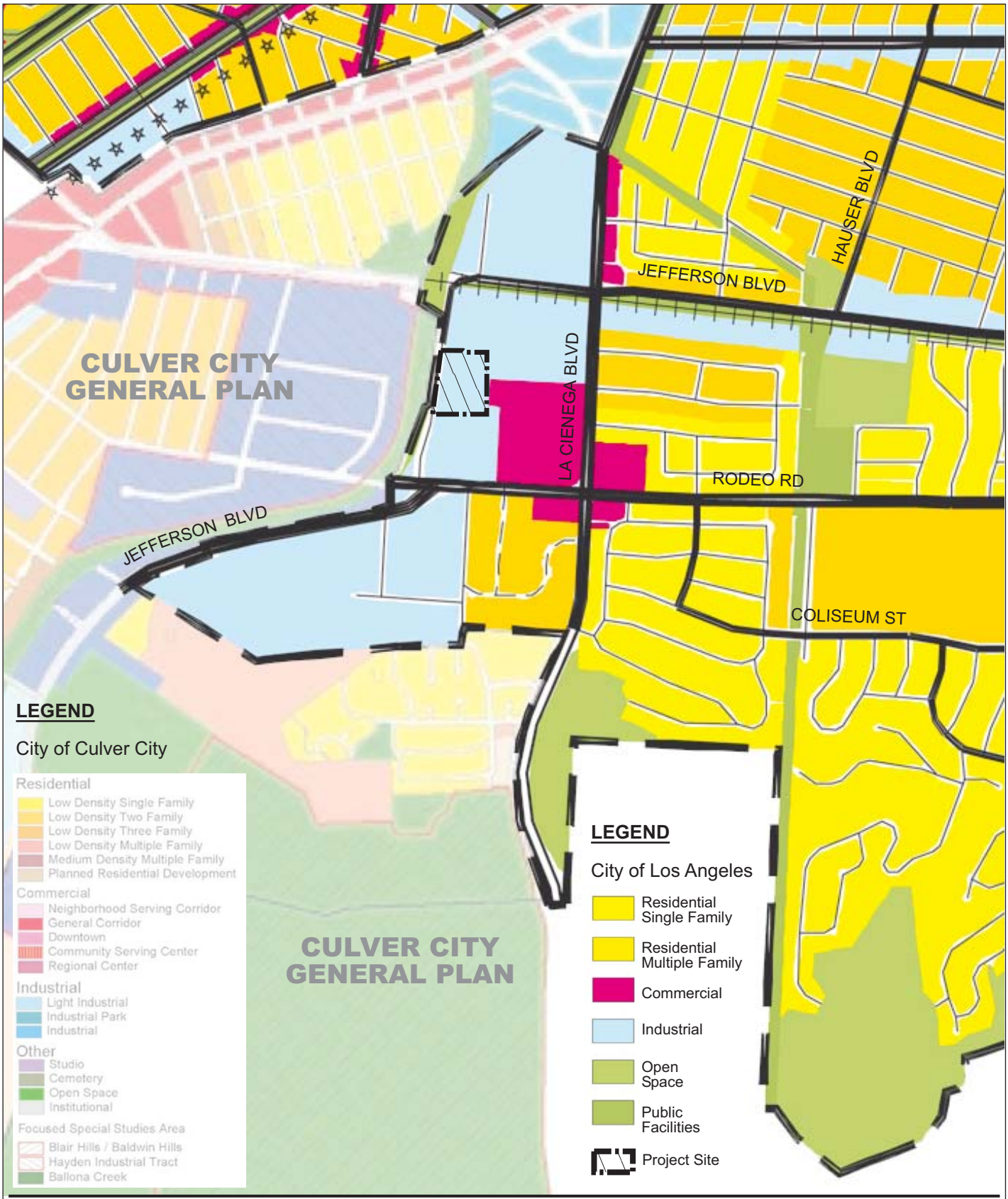


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Figure IV.G-3
West Los Angeles Transportation Facility Community Plan-Land Use Designations

Source: City of Los Angeles Department of City Planning, City of Culver City.

The MR1 zone requires a 15-foot front yard setback for industrial structures on lots greater than 100 feet in depth, and no required setback for side or rear yards. Also, Section 16.05 of the Los Angeles Municipal Code provides that projects containing 50,000 square feet or more of nonresidential floor area are subject to approval of Site Plan Review by the City.

However, Section 53090 et seq. of the California Government Code provides that a rapid transit district whose board of directors is appointed by public bodies or officers or elected from election districts within the area comprising the district is not required to comply with zoning ordinances of a city in which the rapid transit district is located. The Metro Board of Directors is composed of elected officials appointed by various jurisdictions within the area in which Metro operates. Metro is accordingly not required to comply with City of Los Angeles zoning regulations for the development of property located in the City of Los Angeles. Metro nevertheless intends that the development of the West Los Angeles Transportation Center will comply with City zoning regulations to the maximum extent feasible.

(b) Sunset Avenue Project

Framework Element. The Land Use chapter of the Framework Element identifies objectives and supporting policies relevant to the Sunset Avenue Project.

Policy 3.1.4 states: "Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram…."[150] The Long-Range Land Use Diagram for the West/Coastal Los Angeles area, includes the project site within and at the edge of a generally defined Community Center.[151]

Policy 3.2.1 elaborates on the varying density designations of the Long-Range Land Use Diagram. It states:

> "Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhood that are differentiated by their functional role,

[150] *Land use designations are generalized on the Long-Range Land Use Diagram. The precise (parcel) boundaries are to be determined in the community plans.*

[151] *As described on page 3-22 of the Framework Element: "Community centers are intended to be identifiable focal points and activity centers for surrounding groups of residential neighborhoods, serving a population of 25,000 to 100,000. They differ from neighborhood districts in their size and intensity of business and social activity. They contain a diversity of uses such as small offices, overnight accommodations, cultural and entertainment facilities, schools and libraries in addition to neighborhood-oriented uses. They include as an option, mixed use centers that encourage the development of housing in concert with the multi-use commercial uses…. Generally, community centers range from FAR 1.5:1 to 3:1, with precise designations to be determined in the community plan. Building heights generally range from two- to six-stories."*

scale, and character. This shall be accomplished by considering factors, such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations."

Other related Objectives include the following:

3.8 Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit.

3.9 Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.

Venice Community Plan. The Sunset Avenue Project is located within the boundaries of the Venice Community Plan. Land use designations for the project site and surrounding areas are shown on Figure IV.G-4 on page 261. The plan's generalized land use designation for the project site is industrial use. Zoning associated with this use is inclusive of commercial and residential uses. For the most part, the Venice Plan policies implement the Framework Element and provide a basis for the Venice Specific Plan and Venice Local Coastal Program Land Use Plan (LUP). Thus, implementation of the Community Plan is addressed further in the discussion of the Specific Plan and LUP below.

Policies of note within the Venice Community Plan include the following:

1-1.1 Designate specific lands to provide for adequate multi-family residential development.

1-1.3 Protect existing single-family residential neighborhoods from new out-of-scale development and other incompatible uses.

1-2.1 Locate higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development.

1-2.2 Encourage multiple-family residential development in commercial zones.

1-4.1 Promote greater individual choice in type, quality, price and location of housing.

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Figure IV.G-4
Sunset Avenue Project
Community Plan-Land Use Designations

Source: City of Los Angeles Department of City Planning.

2-1.2 Protect commercially planned and zoned areas from encroachment by residential-only development.

The Venice Community Plan also incorporates by reference the Venice Local Coastal Program Land Use Plan (LUP) as described below to address the protection of coastal resources.

Local Coastal Program – Land Use Plan. The Sunset Avenue Project is located within the California Coastal Zone, as established in the California Coastal Act of 1976. As such, the project is subject to review for consistency with coastal policies for the protection of local resources, as delineated in Chapter 3 of the Act. Pursuant to the Act, the City of Los Angeles has approved a Land Use Plan (LUP), the Venice Local Coastal Program Land Use Plan, and a Specific Plan, the Venice Coastal Zone Specific Plan to implement the LUP. The LUP was certified by the California Coastal Commission in 2001, and is incorporated by reference into the Venice Community Plan. As discussed below, the Coastal Commission has not certified the Specific Plan.

The LUP provides policies that further the attainment of the Chapter 3 Coastal Act Policies. Chapter II of the LUP contains Land Use Policies, organized into five Policy Groups, with policies that directly apply to the project site contained in Policy Group I – Locating and Planning New Development/Coastal Visual Resources and Special Communities. The remaining policy groups address broader issues regarding the protection of coastal resources. Policy Group I items that pertain to the project site include the following policies:

1.A.1 The Plan Maps. The Land Use Plan Map for the area surrounding the project site, Exhibit 10a, is shown on Figure IV.G-4. Land uses designations for the project site and surrounding areas are shown on Figure IV.G-5 on page 263. As indicated, the project site's designation is Limited Industry. Exhibit 14a identifies the project site as being located within Height District F, designating maximum heights of 30 feet for projects with a flat roof and 35 feet for projects with varied or setback rooflines.[152] It may also be noted that Exhibit 17a, identifies the project site as a location for a Potential New or Expanded Surface Parking Site or a Potential Public Parking Structure Site.

Other policies that are relevant to the project site include the following:

I.C.7 Bus Yard Redevelopment. Should the (proposed project) site become available, priority uses for its future redevelopment include affordable housing, which may

[152] *As described in the footnotes to Figure 14a: "All building heights shall be measured from the elevation of the fronting right-of-way, except in the Venice Canal Subarea (E) where all building heights shall be measured from the elevation of the adjacent alley."*

Figure IV.G-5
Sunset Avenue Project
Venice Local Coastal Program Land Use Plan-
Land Use Designations

Source: City of Los Angeles Department of City Planning.

be a mixed-use residential-commercial project, and a public parking structure as a measure to improve public access.

I.B.2. Mixed-Use Development. Mixed-use residential-commercial development shall be encouraged in all areas designated on the Land Use Policy Map for commercial use. Residential density in commercial land use designations shall not exceed one unit per 800 to 1,200 sq.ft. of lot area and shall comply with the Floor Area Ratio (FAR) limits set forth in Policy I.B.7.[153]

I.B.7. Commercial Development Standards. The following standards shall apply in all commercial land use designations, unless specified elsewhere within this Land Use Plan. Density/Intensity: Maximum Floor Area Ratio (FAR)… 1.5 to 1 for retail and/or office and residential uses.

I.A.13. Density Bonus Applications. "…In order to encourage the provision of affordable housing units in the areas designated as "Multiple Family Residential" and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915, provided that the affordable housing complies with the following:[154]

a. This is an incentive program that allows developers of any one of the types of residential projects described in Government Code Section 65195(b), and which complies with all standards set forth in Government Code Section 65195, to build up to 25 percent more residential units than a property's zoning would ordinarily allow. In exchange for this density bonus, the owners must make the units affordable for 30 years if an incentive is utilized in addition to a density bonus specified in Government Code Sections 65915(b) or for 10 years if a second incentive is not utilized.

b. If the City approves development with a density bonus, the City must find that the development, if it had been proposed without the 25 percent density increase, would have been fully consistent with the policies and development

[153] *The range specified, 800 to 1,200 sq.ft., is consistent with the R3 zone, as it occurred, at the time the Plan was adopted. Subsequently, Ordinance No. 174,994 was adopted that revises the density calculation for R3 zoning, and specifies a minimum lot site size of 800 sq.ft. per dwelling unit.*

[154] *Section 65195 of the California Government Code (the Mello Act) requires Cities and Counties to provide incentives or concessions for the production of affordable housing units. As described in Subsection (g) "…'density bonus' means a density increase of at least 25 percent, unless a lesser percentage is elected by the applicant over the otherwise maximum allowable residential density under the applicable zoning ordinance and land use element of the general plan…." The act specifies the criteria for the number of affordable units that must be provided, which varies depending upon the income level of the resident; e.g., 10 percent of the units must be affordable if the households qualify as very low income. The act also specifies criteria pertaining to household qualification, costs and duration of housing affordability.*

standards of the certified local coastal program. If the City determines that the means of accommodating the density increase proposed by the applicant do not have an adverse effect on coastal resources, the City shall require that the density increase be accommodated by those means. If, however, the City determines that the means for accommodating the density increase proposed by the applicant will have an adverse effect on coastal resources, before approving a 25 percent density increase, the City shall identify all feasible means of accommodating the 25 percent density increase and consider the effects of such means on coastal resources. The City shall require implementation of the means that are most protective of significant coastal resources.

c. The City may prepare an LCP amendment for certification by the Commission for specific areas or subregions within the planning area where density bonuses in excess of 25 percent may be permitted based on a finding that no adverse impacts on coastal resources would result.[155]

In addition to these policies, the LUP contains several provisions regarding parking to meet coastal needs. Of these, Policy II.A.2, and II.A.4 are intended to encourage the expansion of public beach parking supply. While Policy II.A.2 is a general provision encouraging such parking, it includes several implementation strategies, one of which applies to the proposed project site: "The site of the Los Angeles County Metropolitan Authority (MTA) bus maintenance yard located between Main Street and Pacific Avenue south of Sunset Avenue is a potential site for public parking. It is estimated that about 350 spaces could be provided on the approximately 3-acre site. This site affords good walking access to the beach, and good vehicular access via Main Street and Pacific Avenue." Policy II.A.4 establishes beach parking requirements or in-lieu fees for projects in the Beach Impact Zone.

Venice Coastal Zone Specific Plan. The Venice Coastal Zone Specific Plan specifies zoning and other land use regulations pursuant to the project's location within the North Venice Subarea. As such, the Specific Plan is a mechanism to implement the Community Plan and certified Coastal LUP. The Specific Plan has not been certified by the California Coastal Commissions but is relied upon by the City for issuing Coastal Development Permits.

[155] *It may be noted that the City's affordable housing provisions ordinance pursuant to California Government Code Section 65915(b), Municipal Code Section 12.22 A25 (e), grants density bonuses of 25 percent as a matter of right and an additional 10 percent as a matter of right, pursuant to Ordinance 174995, when a project is located within a 1,500-foot radius of certain transportation facilities, the boundaries of regional centers, the boundaries of economic activity centers or the boundaries of a college or university. The provision in the Venice Local Coastal Program Land Use Plan initially limits the amount to 25 percent, but allows additional units upon amendment to the LCP with a demonstration that no adverse impacts on coastal resources would result. The language of the Specific Plan says that whenever the Specific Plan contains provisions which differ from the provisions contained in the LAMC zoning code, the Specific Plan shall prevail and supercede the applicable provisions of the LAMC zoning code.*

The Specific Plan designates the site zoning as [T][Q]CM-1. Notwithstanding the zoning designation shown in the Specific Plan, the project site is zoned M1-1, limited industrial. Residential uses are generally prohibited in the M1 zone. The project approvals, therefore, include a zone change for the project site. (See Figure IV.G-6 on page 267.) The CM portion of the designation pertains to uses allowed and designates a commercial manufacturing zone that allows a range of commercial and limited manufacturing uses, as well as residential uses. The maximum intensity of commercial development allowed is that associated with the C2 zone. The maximum intensity of residential development is that associated with the R3 zone. Under City of Los Angeles Ordinance No. 174,994, the maximum density for R3 property is derived with a factor of 800 sq.ft. per dwelling unit. The "-1" portion of the designation refers to the City's Height District 1, which defines a maximum floor area ratio (FAR) of 3:1 for R zones and 1.5:1 for C and M zones.

Section 10.F of the Specific Plan provides additional requirements for the North Venice area in which the project is located. Height and setback requirements are as follows:

- The maximum height allowed is 30 feet; or 35 feet for projects with varied rooflines, provided that any portion that exceeds 30 feet is set back from the required front yard at least one foot in depth for every foot in height above 30 feet.

- All residential projects are required to have a front yard setback of not less than five feet. Ground level patios, decks, landscaping and railings, wall and fences which do not exceed six feet in height may encroach into this setback provided they observe a setback of one foot.

Section 13 of the Specific Plan (Parking), establishes parking requirements for development in the Specific Plan area. The requirements that would be applicable to the project's uses are discussed in Section IV.J, Parking, of this Draft EIR. Section 13, Subsection E, of the Specific Plan establishes Beach Impact Zone Parking Requirements. Subsection E requires provision of public parking for coastal related uses or in-lieu fees. To the extent parking is provided on a particular site, this requirement affects local land use arrangements.

Coastal Transportation Corridor Specific Plan. In addition, the Sunset Avenue Project is located within the boundaries of the Coastal Transportation Corridor Specific Plan. This Plan is solely focused on transportation issues and is, therefore, discussed further in Section IV.I, Transportation and Circulation, of this Draft EIR.

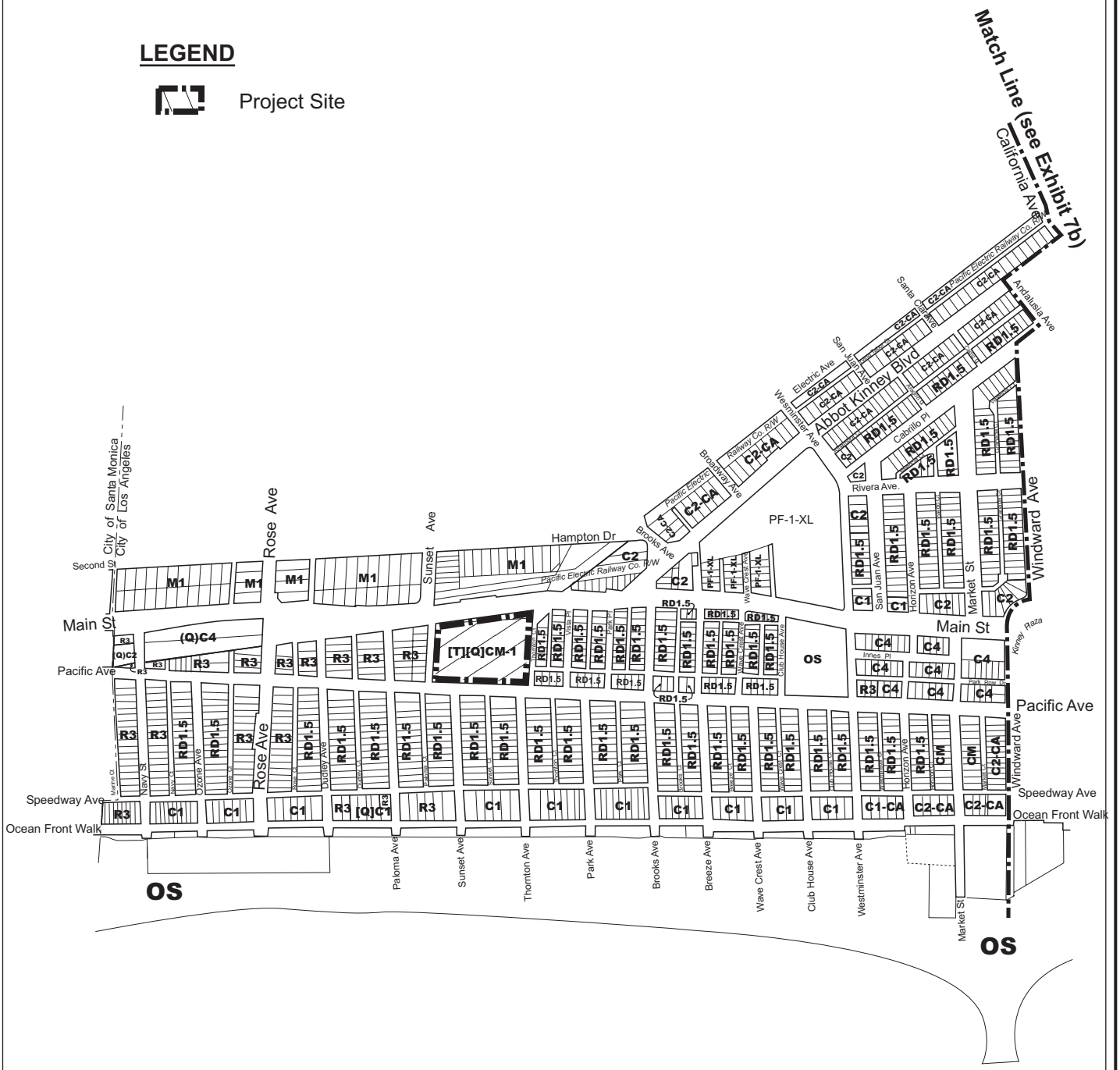

Figure IV.G-6
Sunset Avenue Project
Venice Coastal Zone
Specific Plan-Zoning Designations

Source: City of Los Angeles Department of City Planning.

2. ENVIRONMENTAL IMPACTS

a. Methodology

The Land Use analysis addresses the projects' relationship to the existing land use regulations that are applicable to the project sites, and the relationship between the projects and their surrounding uses. The analysis regarding the regulatory framework compares the proposed uses to the uses recommended, encouraged and/or facilitated in local and regional plans and policies. This analysis identifies applicable plans, policies and goals, delineates the pertinent sections, and discusses the relationship between the proposed uses and the regulatory guidelines. Evaluations are made as to whether the projects are consistent with the plan. Projects are considered consistent, if they are compatible with the general intent of the plans, and would not frustrate the attainment of their primary intent.

The analysis regarding each project's relationship to existing uses compares the proposed uses to the existing land uses surrounding the project sites to determine whether the project would disrupt, divide or isolate existing neighborhoods communities, or land uses. The existing land use information is based on aerial photography, land use maps, and field surveys in which surrounding uses were identified and characterized. As such the analysis addresses general land use relationships and urban form. The extent to which the resulting form would result in impacts on environmental topics such as traffic, noise, etc. is addressed independently in the analysis of applicable topics throughout Section IV, Environmental Impact Analysis, of this Draft EIR.

b. Thresholds of Significance

Thresholds regarding impacts on regulatory framework:

The *L.A. CEQA Thresholds Guide* states that the determination of significance on Land Use Consistency shall be made on a case-by-case basis, considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

These factors have been used directly as significance thresholds in the evaluation of land use impacts regarding the regulatory framework.

Thresholds regarding impacts on surrounding uses:

The *L.A. CEQA Thresholds Guide* states that the determination of significance on Land Use Compatibility shall be made on a case-by-case basis, considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

Under a significance threshold that is based on these factors, the proposed project would have a significant impact with regard to surrounding uses if:

- ☐ The Proposed Project would disrupt, divide or isolate existing neighborhoods, communities, or land uses.

c. Analysis of Project Impacts

(1) West Los Angeles Transportation Facility

(a) Impacts Regarding the Regulatory Framework

The Transportation Facility Project would provide the development of new uses on the project site that are consistent with the land use and zoning designations presented in the West Adams-Baldwin Hills-Leimert Community Plan and City Zoning Ordinance/Municipal Code. Section 12.17.5, "MR1" Restricted Industrial Zones, of the Municipal Code specifically provides for bus parking in subsection B.5.g. when such uses are within "…an area enclosed on all sides with a solid wall or solid fence not less than six feet in height, when no material or equipment is stored to a height greater than that of the enclosing wall or fence…." The ancillary uses including office, administration, maintenance, and fueling facilities would also be included under one or more of the provisions of the MR1 zone and/or lesser intensive included zones.The project's use and design complies with the use, and density prescribed for project site's MR1 zoning. The FAR, inclusive of auxiliary facilities would be 0.35:1, which is well less than the 1.5:1 prescribed. The proposed maximum building heights would be less than the 45 feet prescribed. Compliance with the full front yard setback requirement of this zone, 15 feet, would require Metro to reduce the proposed number of bus parking spaces, thereby decreasing Metro's

ability to effectively serve the central and western portions of its service area. However, as described in the Environmental Setting Sub-section, above, as the proposed project is a rapid transit facility, Metro is not required to comply with City of Los Angeles zoning regulations for the development of property located in the City of Los Angeles.[156] Metro nevertheless intends that the development of the West Los Angeles Transportation Center comply with City zoning regulations to the maximum extent feasible. Metro would provide the maximum feasible setback along Jefferson Boulevard consistent with Metro's ability to achieve project objectives.

Also, the project would not be subject to Site Plan Review by the City, under Section 16.05 of the Los Angeles Municipal Code that applies to projects that contain 50,000 square feet or more of nonresidential floor area. Site Plan Review is a procedural matter that does not establish, per-se, criteria for development that are not otherwise addressed in this EIR.

Implementation of the proposed project would support the Community Plan objectives pertaining to industrial uses and job opportunities, generally; and within existing areas so designated, more specifically. It would also support regional policies, including SCAG policies regarding cost minimization in the provision of infrastructure and provision of services, as well as support for conversion of vehicles to clean fuel/alternative fuel. It would support City of Los Angeles Framework Element policies regarding innovative transit services, transit services to support economic development, and effectiveness of services, and involvement of the private sector in developing community-level accessibility plans. Finally, the Transportation Facility would be consistent with, and a component of, plans for the enhancement of public transportation services as expressed in Metro's Long-Range Transportation Plan for Los Angeles County and Short-Range Transportation Plan for Los Angeles County.

The Transportation Facility Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site; nor would it be inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans. Impacts regarding the regulatory framework would be less than significant.

(b) Impacts Regarding Surrounding Uses

Implementation of the Transportation Facility Project would alter the project site from its current state, a vacant parcel with three small unused and neglected buildings, to an improved

[156] *Pursuant to Section 53090 et seq. of the California Government Code.*

state with the project's bus parking and related maintenance and administration facilities. The project is light-industrial in use, comparable to and consistent with the light-industrial uses surrounding the project site and located throughout this larger light-industrial/commercial district. The project would be buffered from existing residential uses by existing light-industrial and/or commercial uses.

The Transportation Facility Project is an in-fill project and would contribute to the over-all form of the light-industrial district. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide, or isolate any existing neighborhoods, communities, or land uses. Impacts of the Transportation Facility Project regarding surrounding uses would be less than significant.

(2) Sunset Avenue Project

(a) Impacts Regarding the Regulatory Framework

The following discussion regarding the regulatory framework focuses on three issues: (1) the type of uses proposed; (2) the density and heights of the proposed uses in regard to existing plans; and (3) the density and heights of the proposed uses in regard to policies associated with the California Coastal Act.

Proposed Uses. The existing plans and zoning designations reflect a combination of the site's past history, current uses, and prospective uses to replace the current Division 6 bus facility. The Community Plan and Coastal Land Use Plan reflect an Industrial use designation and the current zoning is M1. The most direct policy regarding future use of the site is indicated in Policy I.C.7 of the Local Coastal Program Land Use Plan: "…include affordable housing, which may be a mixed-use residential-commercial project, and public parking structure as a measure to improve public access." The proposed project is a mixed-use project that includes a maximum of 225 residential units, of which 17 units would be designated for very low income households, and 10,000 sq.ft. of commercial use, as well as 71 parking spaces for public use, in accordance with Beach Impact Zone provisions. The project also includes 44 additional parking spaces that could provide fee parking for adjacent residents. Therefore, by virtue of its mixed-use composition inclusive of an affordable housing component and public parking, the proposed project would be consistent with Policy I.C.7.

Provision of the 71 parking spaces would also contribute to the attainment of Policy II.A.2 regarding the expansion of public parking, in keeping with the related implementation requirements of Section 13.E of the Venice Coastal Zone Specific Plan. By placing the units on-site, these spaces contribute to the implementation strategy for Policy II.A that acknowledges the favorable location of the site for public parking. While the

implementation strategy notes that 350 spaces might fit on the lot, the provision of 71 spaces (plus additional excess parking) would meet the Specific Plan requirements, and would be consistent with the more direct Policy recommendation Policy I.C.7 for a mixed-use development.

The Specific Plan proposes a re-designation of the site's current M1 zoning to a zone of CM-1. This zone is conducive to implementation of the recommended uses in Policy I.C.7, and the proposed project. Accordingly, the project includes as a project component, the rezoning of the site per the designation in the Specific Plan, bringing the designations and proposed project into conformance.

Development of the proposed uses would also contribute to various regional policies. It would support SCAG Growth Management Plan policies and Framework Element policies that encourage land use patterns with a range of densities, mixed-use development, the development of community centers with a range of uses, and increases in housing availability at a variety of densities and costs. The project would contribute to the Framework Element designation of a community center in the project vicinity, albeit at less density than might occur in such a center. The project would replace an industrial site with residential and commercial activities that would contribute to the function of Main Street, extending from Santa Monica to Abbot Kinney Boulevard, as an activity center.

Based on the preceding paragraphs above, the proposed project uses would be consistent with the following applicable plans: the Community Plan, Coastal Land Use Plan, Specific Plan, SCAG Growth Management Plan, and City of Los Angeles Framework Element. Therefore, the proposed project uses would not cause a significant impact with regard to the regulatory framework.

Density Impacts Regarding Applicable Plans. The proposed project would construct a maximum of up to 225 units, of which 17 units would be designated for very low income persons pursuant to the Mello Act and policies of the Local Coastal Land Use Plan. With the inclusion of affordable housing, the project would be subject to review under Policy I.A.13 of the Local Coastal Land Use Plan that allows the City to grant additional densities and building heights to encourage the provision of affordable housing units. Policy I.A.13 offers specific density bonuses, but is non-specific on additional building heights, directly.

Under of the provisions of the proposed CM zone, 171 units of base density would be allowed in the proposed project.[157] Under the Mello Act, inclusion of 10 percent of the base density, or 17 affordable units, for very low income households would qualify the project for the density bonus of up to 25 percent of the base density or 43 bonus units. Therefore, a total of 214 units would be allowed for the proposed project with 17 of those units set aside for very low income families.

In 2003, the City adopted Ordinance No. 174995 (the "Ordinance") that amended the Los Angeles Municipal Code ("LAMC") Section 12.22. This Ordinance provides for an increase in the maximum density bonus otherwise permissible under the Mello Act. The Ordinance allows an additional density bonus of 10 percent of base density over and above a 25 percent bonus provided by the Mello Act if the proposed project is generally at or within 1,500 feet of certain transit facilities (e.g., a bus stop along a major bus route), the boundaries of regional centers, the boundaries of economic activity centers or the boundaries of a college or university. The minimum number of affordable units reserved under the Ordinance is the same as with the 25 percent density bonus. The proposed project meets qualifications for the additional bonus (e.g., location on a major bus route). Therefore, the proposed project could potentially be entitled with as many as 231 units inclusive of both density bonus provisions. However, the Applicant has limited the project application to a maximum of 225 dwelling units. Pursuant to Policy I.A.13, if total dwelling units exceed the 25 percent Mello Act bonus provision (214 units), the exceedance can only be allowed with an amendment to the Local Coastal Plan upon a demonstration that the additional density would not have an adverse impact on coastal resources.

The project would be consistent with setback requirements. The project proposes Specific Plan exceptions for height and FAR. While the limitations of height exceptions that can be granted to encourage affordable housing are not specified in the LCP, it is reasonable to expect that such exceptions would parallel the density bonus provisions. Given property dedications in order to expand adjoining street rights-of-way, required perimeter setbacks, the reservation of sufficient interior open space to ensure suitable spatial relationships between residential structures, and the provision of variable building heights, the primary remaining variable through which to accommodate additional density is additional height. Therefore, an increase in building heights commensurate with the increase in density should be expected and would be consistent with the intent of Policy I.A.13.

[157] *Densities would be based on those associated with R-3 zoning and would require a minimum of 800 sq.ft. per unit. The project includes as project action, an adjustment for yard area that addresses the calculation of allowable densities.*

Similarly, with regard to the FAR limitation of the proposed CM-1 zone and height district, an exception to the maximum floor area ratio (FAR) of 1.5:1 would parallel the density bonus provisions. With approximately 136,800 sq.ft. of land area, the FAR restriction of 1.5:1 would allow total floor area within the project of approximately 205,200 sq.ft. With an exception of 35 percent (the sum of the Mello Act provision of 25 percent and the Ordinance provision of 10 percent), total floor area could reach approximately 277,000 sq.ft., which is an FAR of 2.03:1. Thus, a FAR on the order of 2.0/1 would implement the spirit of the City's density bonus provisions.

The project's density provisions would be consistent with the applicable regulations, provided it satisfies applicable affordable housing regulations and provided that residential units in excess of 214 be authorized by an amendment to the LCP, pursuant to the implementation of mitigation measures addressing these two provisions. Therefore, the project would be consistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site, and would be consistent with the General Plan or adopted environmental goals or policies contained in other applicable plans. Impacts regarding the regulatory framework would be less than significant.

The above analysis concludes that the Sunset Avenue Project's density would be consistent with the general aims of the applicable plans and policies for the project site. Notwithstanding, the increase in site density would have certain affects on the physical environment regarding topics such as traffic, air quality, noise and aesthetics. Analyses pertaining to such direct affects on the environment are addressed in the applicable environmental topics in Section IV, Environmental Impact Analysis, of the Draft EIR. This increased density has been considered in and has contributed to the conclusions that the proposed project would not have significant impacts on any environmental subject which may be influenced by density, except the aesthetics subject due to project building heights. Potential impacts on coastal resources that would be associated with the density bonus for affordable housing and associated height and FAR exceptions is addressed in the following discussion of impacts on coastal resources.

Impacts Regarding Coastal Resources. The certified LUP includes policies pertaining to the protection of coastal resources. The LUP land use designations and policies are organized under five headings that directly relate to Coastal Act policies established in Chapter 3 of the Coastal Act. The five headings are: (I) Locating and Planning New Development/Coastal Visual Resources and Special Communities; (II) Shoreline Access; (III) Recreation and Visitor-Serving Facilities; (IV) Water and Marine Resources, Environmentally Sensitive Habitat Areas, and Hazards; and (V) Public Works.

Many of the policies are intended to control development uses that vary from those of the proposed project or environmental settings that are different than those of the proposed project site. Coastal zone impacts at the project site are somewhat limited due to the site's location. Specifically, the project is located on an urbanized in-fill site. In addition, while the project site is proximal to the coastline, it is located somewhat inland, east of Pacific Avenue. It is also not immediately adjacent to coastal recreation facilities, marine resources or environmentally sensitive habitat areas.

The proposed project may have affects relative to Policy Group I, II, and III. Sections 30222 and 30223 of the Coastal Act (as discussed under Policy Group III) address priority uses for the coastal zone.

> Section 30222: The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreational shall have priority over private residential, general industrial, or general commercial development….

> Section 30223: Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

At the same time, accommodation of non-priority uses is addressed in Section 30250 and 30253(5).

> Section 30250.a: New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources….

> Section 30253(5): New development shall: Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

Policies regarding the provision of parking to support shoreline access (Policy Group II) are addressed in Section 30252(4).

> Section 30252(4): The location and amount of new development should maintain and enhance public access to the coast by …(4) providing adequate parking facilities or providing substitute means of serving the development with public transportation.

The project's public parking and commercial uses would be directly responsive to the priority uses specified in Sections 30222 and 30223. The public parking would support access to the coastal zone and shoreline, in particular. The public parking would also be supportive of Section 30252(4) that seeks to enhance coastal access through the provision of adequate parking. (The project's provision of Beach Impact Zone parking is addressed further in Section IV.J, Parking.) The commercial uses would contribute to the development of Main Street as a visitor-destination.

The project's residential uses, while not priority uses, would satisfy Section 30250.a. The proposed residential uses would consist of infill development amidst existing residential neighborhoods on the north, west and south. The proposed residential units would be sited somewhat inland of the beach and associated attractions and would not interfere with existing coastal-dependent uses or activities. Further, the residential development would be consistent with the uses proposed in Policy I.C.7 of the certified Coastal LUP. Pursuant to that policy, the affordable housing would allow lower income households to live within the coastal zone and would absorb demand for housing on a site identified in the certified Plan for such uses.

As described above, the project is proposing residential densities that include bonuses for the inclusion of affordable housing. Again, these uses are consistent with Policy I.C.7 of the certified plan. Increasing the density of the project site would not pose any adverse effects with regard to Sections 30222, 30223, or 30250.a of the Coastal Act. In fact, the proposed project accommodates existing demand for residential uses in the coastal zone within existing residential areas providing some relief in demand upon other locations that may have more effect on priority uses.

Policy Group I in the LUP also addresses Section 30251 of the Coastal Act regarding scenic and visual qualities.

> Section 30251: The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

The proposed project would be located inland of the coast in an area that does not offer public or private views of the ocean, or any scenic coastal areas. The site is not located within or adjacent to any natural landforms that contribute to the visual quality of the area. As infill development, the project would be compatible with nearby land uses in the area. The development would replace an aging infrastructural facility that has long presented a visually degraded appearance with compatible new development. Therefore, the project would not adversely affect coastal scenic resources. (The project's impacts on visual resources are discussed further in Section IV.A, Aesthetics.)

The proposed project would be consistent with provisions of the certified LUP, would minimize potential impacts pursuant to its policies and would not have adverse affects on coastal resources. As described above, any project units in excess of 214 units would require an amendment to the LUP. The additional units, and their related densities, would not have noticeable effects on coastal resources that would not otherwise occur under a 214 unit project. The project would not interfere with access to the shoreline, would not have adverse affects on water and marine resources and environmentally sensitive habitat areas, nor would it have adverse affects with regard to the provision of public works. Therefore, the project would be consistent with plans and policies regarding coastal resources, and would not have a significant impact with regard to such regulations.

(b) Impacts Regarding Surrounding Uses

Implementation of the Sunset Avenue Project would convert the project site from its current use as a bus maintenance and operations facility to a developed site with up to 225 residential units and 10,000 sq.ft. of commercial uses, including a health club/spa, coffee shop, and retail. While site character and activity would change, the project would not alter the general land use relationships in the area. As the site is currently fenced and unavailable to the public, its development would not affect community travel patterns or accessibility except by virtue of enhanced local parking capability. Main Street and Pacific Avenues would maintain their current transportation functions and Sunset Avenue and Thornton Avenue would continue to allow neighborhood vehicular access as well as pedestrian access between Main Street and Pacific Avenue.

As infill development, the proposed project would continue existing development patterns in the immediate locale. The Main Street frontage would continue a pattern of mixed residential and commercial uses, and the Pacific Avenue frontage would see the extension of its residential land use pattern to the project site. Proposed new commercial uses on Main Street would support the extension of Main Street to Abbot Kinney Boulevard as a community activity corridor. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods,

communities, or land uses. Impacts of the Sunset Avenue Project regarding surrounding uses would be less than significant.

(3) Combined Impacts

Potential adverse land use impacts associated with each of the projects are based on local conditions and the specific development proposals at each of the development sites. Therefore, the impacts are as reported for the Transportation Facility and Sunset Avenue Projects, independently. Their relationship to applicable regulations occurs in different Community Plan areas, and the proposed developments are neither large enough, nor sufficiently proximate to combine in affecting the overall urban form.

At the same time, it may be noted that implementation of each of the projects is interrelated. The net effect is to allow relocation of an infrastructural type of use into an area that is more distant from residential areas, and outside of the coastal zone. In combining the two projects, an opportunity is created for Metro to meet its obligations for supporting public transit, without having to rely on eminent domain, relocation of existing uses, or seeking amendments to existing plans. Thus, the combined projects are supportive of policies that encourage innovative solutions, efficiency in the provision of public transit services and private/public partnerships in furthering land use goals and policies.

3. CUMULATIVE IMPACTS

Each of the proposed projects is located in a different community with impacts affected by a different set of related projects and local regulations. The changes in land use impacts and potential cumulative changes are localized in nature and would not involve alterations in the larger-scale regional form. Impacts of the two projects would not have combined effects with regard to land use.

None of the related projects is located in the immediate vicinity of the Transportation Facility site. The nearest related project is a small live/work building that would be an added in-fill to the light-industrial/commercial district on the western side of the Ballona Channel. The routing of the Exposition LRT line would pass north of the Transportation Facility site with a station located at the intersection of Jefferson Boulevard and La Cienega Boulevard. This project would include mitigation measures to address land use issues related to neighborhood effects and displacement and relocation; and would reduce potential impacts to less than

significant.[158] Other related projects would be in-fill projects at more distant locations. Other related projects would be required to comply with local regulations. Therefore, the proposed project would not combine with other projects in affecting the regulatory framework nor the patterns of local development.

Only two of the related projects are located within the immediate proximity of the Sunset Avenue Project. One of the projects, the Artist Lofts dwelling units, is opposite the proposed project site across Main Street. The second project, a 35-unit condominium project is to be located south of Artists Lofts. These related projects are in keeping with the uses and eclectic character of the area along and east of Main Street. Other related projects would be in-fill projects at more distant locations. Other related projects would be required to comply with local regulations. Therefore, the proposed project would not combine with other projects in affecting the regulatory framework nor the patterns of local development.

Therefore, the proposed projects would not contribute to a cumulative inconsistency with the adopted land use/density designation in the Community Plans, redevelopment plans or specific plan; nor would they contribute to a cumulative inconsistency with the General Plan or adopted environmental goals or policies contained in other applicable plans. The projects would not contribute to a cumulative affect that would cause the disruption, division or isolation of an existing neighborhood, community or land use. Cumulative impacts would be less than significant.

While none of the related projects in the immediate vicinity of the projects would contribute to cumulatively significant land use impacts in concert with the proposed projects, it should be noted that the development of the Sunset Avenue Project involves full use of the development densities permitted. In so doing, that would contribute to a pattern of increasing residential densities beyond typical residential development in the immediate project vicinity. The effects of density increases on environmental topics such as traffic, noise and air quality is addressed in the cumulative analyses for those topics.

4. MITIGATION MEASURES

West Los Angeles Transportation Facility. With implementation of the West Los Angeles Transportation Facility, land use impacts would be less than significant and no mitigation measures would be required.

[158] *Mid-City/Westside Transit Draft EIS/EIR, April 2001.*

Sunset Avenue Project. The following mitigation measures are recommended to ensure that the Sunset Avenue Project is consistent with the Local Coastal Land Use Plan.

Mitigation Measure Sunset-G.1: The total number of units and market/affordable mix shall be consistent with California Code Section 65915, as reflected in LUP Policy I.A.13(a). (This measure addresses impacts regarding consistency with the Local Coastal Land Use Plan as discussed beginning on page 272 of this Section of the Draft EIR).

Mitigation Measure Sunset-G.2: Any number of units in addition to 214 shall only be allowed upon a certified LCP amendment, based on a finding that no adverse impacts on coastal resources would result per LUP Policy 1.A.13 (d). (This measure addresses impacts regarding consistency with the Local Coastal Land Use Plan as discussed beginning on page 273 of this Section of the Draft EIR).

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

West Los Angeles Transportation Facility. The Transportation Facility Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site, nor would it be inconsistent with the General Plan or adopted goals or policies contained in other applicable plans. Therefore, impacts regarding the regulatory framework would be less than significant.

The Transportation Facility Project would be an in-fill project contributing to the over-all form of the light-industrial/commercial area in which it is proposed. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Transportation Facility Project regarding surrounding uses would be less than significant.

Sunset Avenue Project. The Sunset Avenue Project would be compatible with the overall aims of applicable plans and therefore considered not to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site, nor would it be inconsistent with the General Plan or adopted goals or policies contained in other applicable plans. Therefore, impacts of the Sunset Avenue Project regarding the regulatory framework would be less than significant.

The Sunset Avenue Project would be an in-fill project placing residential uses amidst existing and anticipated residential uses. It would not alter the activities along Main Street, contributing to its mixed-use character, or activities along Pacific Avenue. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Sunset Avenue Project regarding surrounding uses would be less than significant.

Combined Impacts. Potential adverse land use impacts associated with each of the projects are based on local conditions and the specific development proposals at each of the development sites. Therefore, the impacts are as reported for the Transportation Facility and Sunset Avenue Projects, independently. Their relationship to applicable regulations occurs in different Community Plan areas, and the proposed developments are neither large enough, nor sufficiently proximate to combine in affecting the overall urban form.

At the same time, it may be noted that implementation of each of the projects is interrelated. The net effect is to allow relocation of an infrastructural type of use into an area that is more distant from residential areas, and outside of the coastal zone. In combining the two projects, an opportunity is created for Metro to meet its obligations for supporting public transit, without having to rely on eminent domain, relocation of existing uses, or seeking amendments to existing plans. Thus, the combined projects are supportive of policies that encourage innovative solutions, efficiency in the provision of public transit services and private/public partnerships in furthering land use goals and policies.

IV. Environmental Impact Analysis

1. ENVIRONMENTAL SETTING

a. Noise and Vibration Basics

(1) Noise

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perceptibility of sound is subjective and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human, frequency-dependent response, the A-weighted filter system is used to adjust measured sound levels. The A-weighted sound level is expressed in “dBA.” This scale de-emphasizes low frequencies to which human hearing is less sensitive and focuses on mid- to high-range frequencies. Due to the physical characteristics of noise transmission and reception, an increase of 10 dBA is normally required to achieve a doubling of the “loudness,” as perceived by the human ear. In addition, a 3-dBA increase is recognizable to most people. A change in noise level will usually not be detectable unless the new noise source is at least as loud as the ambient conditions. Typical A-weighted sound levels measured for various sources, as well as people’s responses to these levels, are provided in Figure IV.H-1 on page 283.

Objects that obstruct the line-of-sight between a noise source and a receiver reduce the noise level if the receiver is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as “barrier insertion loss.” If a receiver is located behind the wall but still has a view of the source (i.e., line-of-sight not fully blocked), some barrier insertion loss would still occur, however to a lesser extent. Additionally, a receiver located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall reflects noise back to the receiver, thereby compounding the noise.

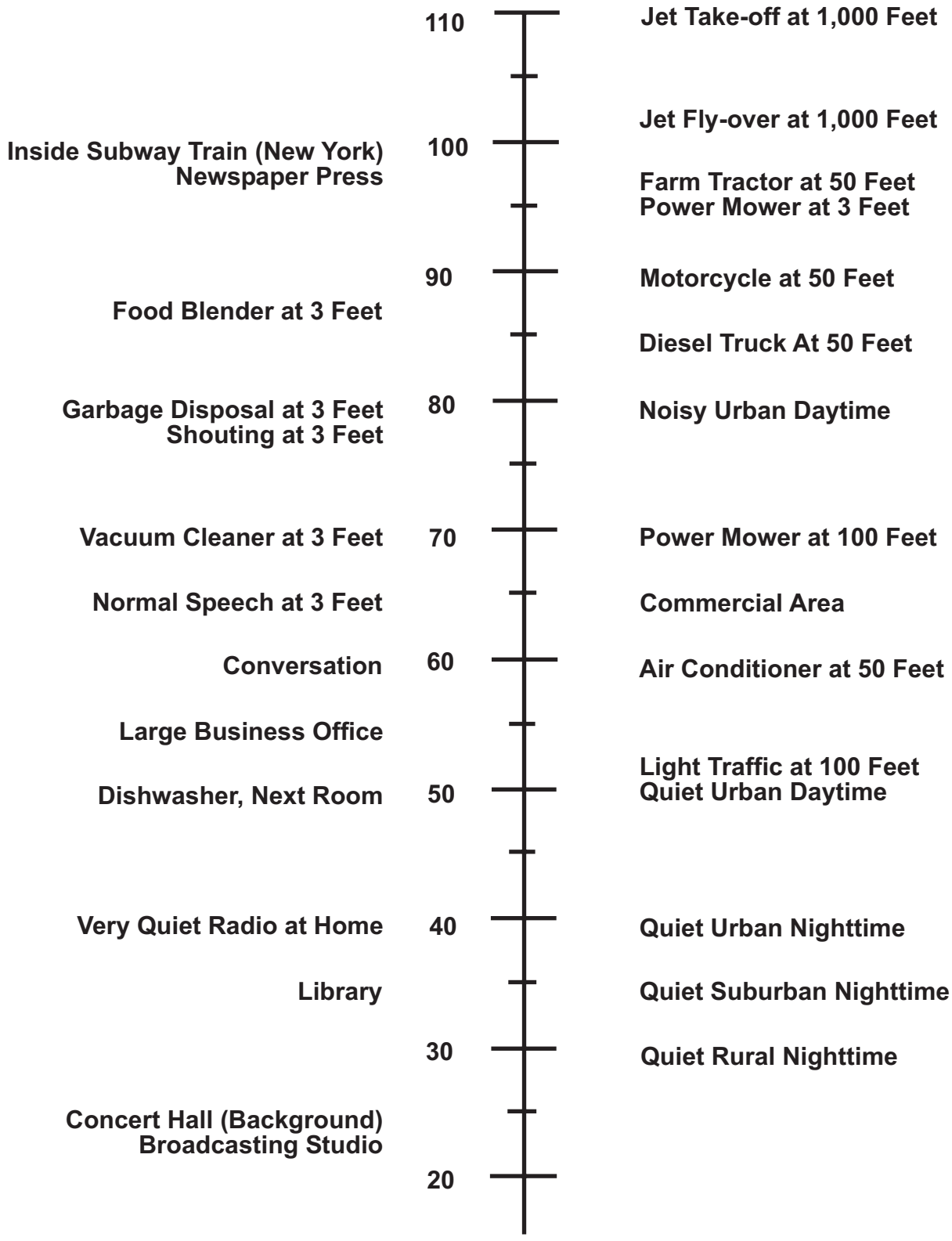

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Figure IV.H-1
A-Weighted Sound Levels

Source: Compiled by Hodges & Shutt from Various Sources (December 1993)

Time variation in noise exposure is typically expressed in terms of the average energy over time (L_{eq}), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given period of time. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L_8 and L_{25} represent the noise levels that are exceeded 8 and 25 percent of the time, respectively, or for 5 and 15 minutes during a 1-hour period, respectively.

Other values typically noted during a noise survey are the L_{min} and L_{max}. These values represent the minimum and maximum noise levels observed during a measurement period. Maximum and minimum noise levels, as compared to the L_{eq}, are a function of the characteristics of the noise source. For example, sources such as compressors, generators, and transformers have maximum and minimum noise levels that are similar to L_{eq} since noise levels for steady-state noise sources do not substantially fluctuate. However, as another example, vehicular noise levels along local roadways result in substantially different minimum and maximum noise levels when compared to the L_{eq} since noise levels fluctuate during pass by events.

Although the A-weighted scale accounts for the range of people's response, and therefore, is commonly used to quantify individual event or general community sound levels, the degree of annoyance or other response effects also depends on several other perceptibility factors. These factors include:

- Ambient (background) sound level;
- Magnitude of sound event with respect to the background noise level;
- Duration of the sound event;
- Number of event occurrences and their repetitiveness; and
- Time of day that the event occurs.

Several methods have been devised to relate noise exposure over time to human response. A commonly used noise metric for this type of study is the Community Noise Equivalent Level (CNEL). The CNEL, originally developed for use in the California Airport Noise Regulation, adds a 5 dBA penalty to noise occurring during evening hours from 7:00 P.M. to 10:00 P.M., and a 10 dBA penalty to sounds occurring between the hours of 10:00 P.M. to 7:00 A.M. to account for the increased sensitivity to noise events that occur during the quiet late evening and nighttime periods. Thus, the CNEL noise metric provides a 24-hour average of A-weighted noise levels at

a particular location, with an evening and a nighttime adjustment, which reflects increased sensitivity to noise during these times of the day.

(2) Ground-Borne Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration amplitudes. PPV is defined as the maximum instantaneous peak of the vibration signal, while RMS is defined as the square root of the average of the squared amplitude of the signal. PPV is typically used for evaluating potential building damage, whereas RMS is typically more suitable for evaluating human response. In general, PPV is a factor of 1.7 to 6 times greater than RMS vibration velocity and a factor of 4 is recommended by the Federal Transit Administration (FTA).[159] In addition, the FTA recommends protecting existing structures by limiting vibration levels to 0.2 inches per second PPV. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Man-made vibration issues are therefore usually confined to short distances (i.e., 500 feet or less) from the source.

Construction can generate varying degrees of ground-borne vibration, depending on the construction procedures and the construction equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach the levels that damage structures.

During percussive pile driving, ground-borne vibration levels near the source of activity depend mainly on the soil's penetration resistance. The resistance provided by the soils consists of friction along the sides of the pile as well as compressional resistance due to the transfer of energy of the pile tip to the soil. In soils such as sand and silt, this resistance is relatively low; and therefore, a large portion of the impact energy is used to advance the pile, which would leave less energy to generate ground-borne vibrations. In clay soils, however, the penetration resistance is higher and more energy is available for ground-borne vibrations. Figure IV.H-2 on page 286 shows typical pile driving vibrations with distance, for a 50,000 foot-pounds of force energy impact pile driver, for two different soils (clay and sandy with silt). Clay soils provide

[159] *Federal Transit Authority, Transit Noise and Vibration Impact Assessment, Final Report, April 1995.*

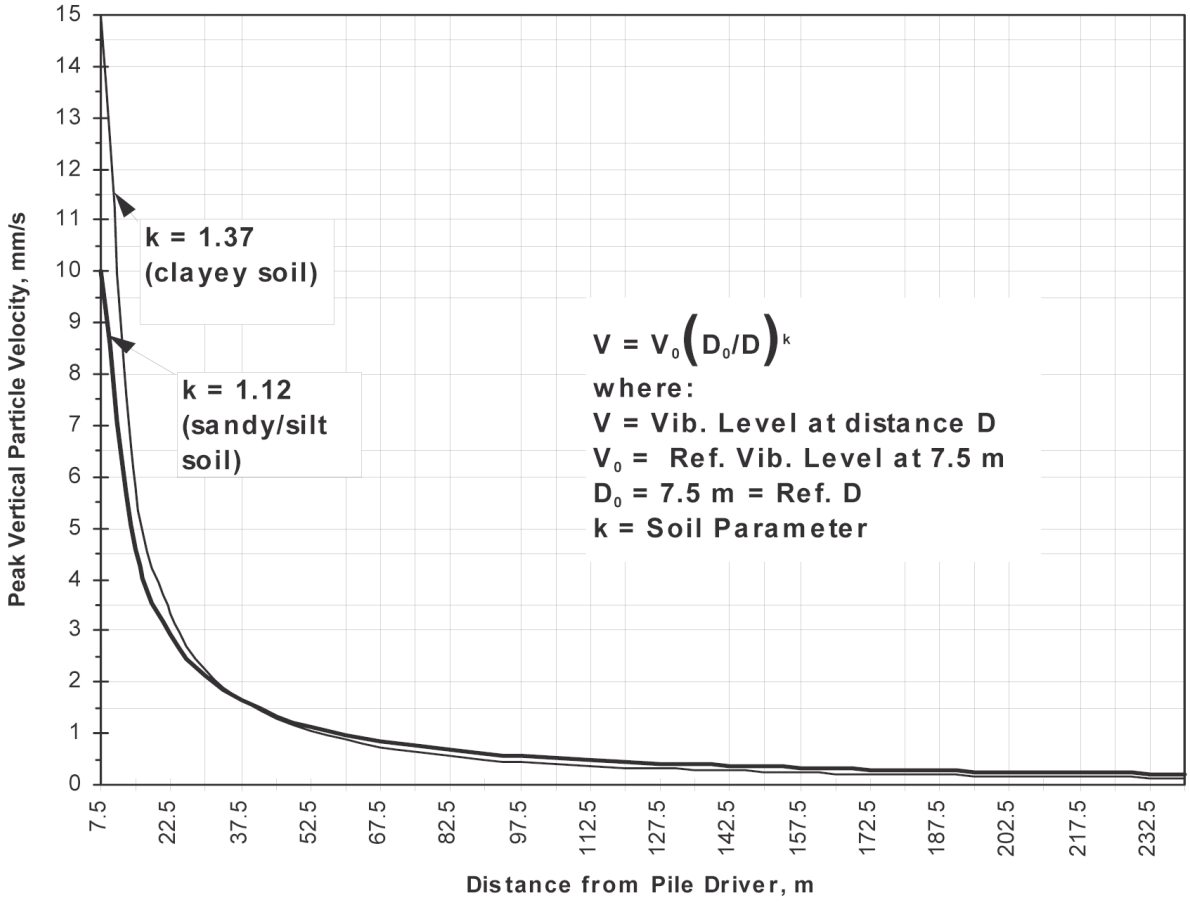

Figure IV.H-2
Expected Ground-Borne Vibration Generated by a 68,000 J (50,000 ft lbf) Impact Pile Driver

Source: Caltrans, Technical Advisory, Vibration, TAV-02-01-R9601, Feb. 2002

more resistance to advancing piles and therefore generate higher vibration levels near the source than those in sandy soils. Vibrations in clay soils, however, tend to drop off more rapidly with distance than those in sandy soils.

b. Existing Conditions

(1) West Los Angeles Transportation Facility

(a) Noise-Sensitive Receiver Locations

Certain land uses are particularly sensitive to noise including schools, residences, hospitals, rest homes, long-term medical and mental care facilities, parks, and recreation areas. Sensitive receivers near the project site are displayed in Figure IV.H-3 on page 288. As shown therein, the closest noise-sensitive uses within the project vicinity include the Syd Kronenthal Park, located approximately 750 feet northwest of the project site where National Boulevard crosses Ballona Creek, and the Cameo Woods Condominium property, located approximately 800 feet south of the project site at the intersection of Rodeo Road and Lenawee Avenue; however, neither of these properties have a direct "line-of-sight" to the project site due to existing development north of the project site and office frontage along the north side of Rodeo Road. The closest residential properties that have direct line of sight to the proposed development are the hillside properties, located approximately 2,500 feet south of project site's southern boundary, in the Blair Hills community of Culver City. In addition, residential uses are located east of La Cienega Boulevard and north/northwest of the Syd Kronenthal Park.

Along the proposed bus route, residential uses are also present behind commercial frontage on the east side of La Cienega Boulevard, north of Jefferson Boulevard.[160] These properties are set back approximately 100 feet from the La Cienega Boulevard right-of-way, separated by commercial lot frontage (currently used for parking) and a six-foot masonry block wall. The Syd Kronenthal Park is approximately 200 feet west of the proposed bus route, situated north of National Boulevard and west of the Ballona Creek channel.

(b) Existing Noise Environment

The primary noise source within the project vicinity is roadway traffic along local roadways, such as Jefferson, National, and La Cienega Boulevards. Secondary noise sources include general industrial-related activities, such as loading dock/delivery truck activities, trash compaction, refuse service activities, and distant aircraft flyovers. The project site is zoned MR1

[160] *From the general service area, inbound buses would access the West Los Angeles Transportation Facility by traveling south on La Cienega Boulevard to Jefferson Boulevard, turning right on Jefferson Boulevard, and proceeding to the site. This same route would be utilized for site egress, but in reverse order.*

LEGEND

- R# Noise Monitoring Location
- Sensitive Receiver Location
- Project Site

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Figure IV.H-3
West Los Angeles Transportation Facility
Noise Monitoring Positions and
Sensitive Receiver Locations

Source: Landiscor, 2004

(Restricted Industrial). Areas immediately surrounding the project site are also zoned MR1 with the exception of the Target retail store that is located at the northwest corner of La Cienega Boulevard and Rodeo Road that is zoned C4 (Commercial). These areas are not considered noise sensitive. The presumed ambient noise level for these areas as set forth in the City of Los Angeles Municipal Code (LAMC), Sections 111.02 and 112.05 is provided in Table IV.H-1 on page 290.

Long-term noise monitoring was conducted at three locations to determine the existing ambient sound level at the closest noise sensitive areas located within the project vicinity. These locations were selected based on their ability to provide a representative characterization of the noise conditions surrounding the project site. Off-site noise monitoring locations included the backyard of a Blair Hills residential property, located approximately 2,500 feet south of the project site, which has a direct line of sight to the proposed site location; and a location within the Syd Kronenthal Park, which is located approximately 750 feet north-northeast of the project site. In addition, a noise measurement was conducted on the project site. Each of the three monitoring positions is discussed below and is depicted in Figure IV.H-3 on page 288:

- Receiver Location 1 (R1): The sound level meter was placed in the rear yard of a Blair Hills residential hillside property that overlooks the project site and surrounding vicinity.

- Receiver Location 2 (R2): The sound level meter was placed on the project site, approximately 25 feet from the Jefferson Boulevard right-of-way. Roadway traffic along Jefferson Boulevard was the dominant noise source at this receiver location.

- Receiver Location 3 (R3): The sound level meter was placed within the Syd Kronenthal Park, approximately 25 feet from the National Boulevard right-of-way. Roadway traffic along National Boulevard and Jefferson Boulevard was the dominant noise source at this receiver location.

A summary of noise measurement data is provided in Table IV.H-2 on page 291. As shown in Table IV.H-2, ambient noise levels at the Blair Hills residence and Syd Kronenthal Park locations exceed the presumed ambient noise levels indicated earlier in Table IV.H-1.

The CNEL generated by existing traffic on local roadways was established using roadway noise equations provided in the Caltrans Technical Noise Supplement (TeNS) document and traffic data provided by the project traffic consultant.[161] The vehicle mix on the

[161] *The roadway noise calculation procedures provided in TeNS are consistent with Federal Highway Administration RD-77-108 "industry standard" roadway noise prediction methodologies.*

Table IV.H-1

PRESUMED AMBIENT NOISE LEVELS (dBA)

Zone	Day	Night
Residential	50	40
Commercial	60	55
Manufacturing	65	65
Heavy Manufacturing	70	70

Source: LAMC, Section 111.03.

surrounding roadways was based on Caltrans traffic counts for similar roadways such as Lincoln Boulevard and Venice Boulevard, and City of Los Angeles Department of Transportation traffic counts for La Cienega Boulevard and Jefferson Boulevard.

In accordance with TeNS, the peak hour traffic volume was assumed to be ten percent of the average daily traffic (ADT) volume. Consideration was given to the roadway configuration, percentage of 2- and 3-axle trucks, posted vehicle speed, and right-of-way distance (property line). Table IV.H-3 on page 292 provides the CNEL for the analyzed roadway segments in the project vicinity and along the bus route. As shown in Table IV.H-3, the calculated CNEL resulting from existing traffic ranged from 61.8 dBA to 66.1 dBA at a reference distance of 50 feet along the analyzed roadway segments.

(c) Vibration-Sensitive Receiver Locations

There are no residential uses located within the area of potential effect for perceptible vibration during project construction or operations. As described above and shown previously in Figure IV.H-3 on page 288, the nearest residential use is approximately 800 feet from the project site. With respect to structures, vibration-sensitive receivers generally include historic buildings, buildings in poor condition, and uses that require precision instruments (e.g., operating rooms or scientific laboratories). No vibration-sensitive structures or uses are present within the area that may be affected by the project.

(d) Existing Ground-Borne Vibration Environment

The only source of ground-borne vibration in the project vicinity is vehicular travel (refuse trucks, delivery trucks, school buses, and transit buses) on local roadways. These sources of existing ground-borne vibration levels are negligible.

Table IV.H-2

WEST LOS ANGELES TRANSPORTATION FACILITY
SUMMARY OF AMBIENT NOISE MEASUREMENT DATA (dBA) [a]

Measurement Location	Daytime Hourly Ambient L_{eq} [b]			Nighttime Hourly Ambient L_{eq} [b]			CNEL
	Avg.	Min.	Max.	Avg.	Min.	Max.	
R1 – Blair Hills Residence	51.8	49.0	58.0	47.7	43.8	50.3	55.1
R2 – Proposed Project Site	55.9	53.7	57.0	52.9	51.7	54.1	60.2
R3 – Syd Kronenthal Park	57.0	54.7	59.3	51.6	47.8	56.2	60.3

[a] *Based on ambient sound measurements conducted using a Larson-Davis 820 Type 1 Integrating Sound Level Meter. Noise measurement data is provided in Appendix E.*
[b] Daytime hours are from 7:00 A.M. to 10:00 P.M. and Nighttime hours are from 10:00 P.M. to 7:00 A.M.

Source: PCR Services Corporation, 2004.

(2) Sunset Avenue Project

(a) Noise-Sensitive Receiver Locations

Certain land uses are particularly sensitive to noise including schools, residences, hospitals, rest homes, long-term medical and mental care facilities and parks and recreation areas. Sensitive receivers near the project site are displayed in Figure IV.H-4 on page 293. As shown therein, residential uses generally surround the project site. Residences are currently located immediately north of Sunset Avenue, south of Thornton Place, and west of Pacific Avenue, from the project site. Each of the first row residences along these adjacent streets has a direct line of sight to the project site. There is also a new residential development that is currently under construction east of the project site across Main Street.

(b) Existing Noise Environment

The primary noise sources within the project vicinity are roadway traffic along local roadways such as Pacific Avenue and Main Street and the on-going operational activities that currently occur at the Metro facility such as engine starts, engine revs, bus idling, backup alarm beeps, air compressor machines, and the bus wash operation. Secondary noise sources include residential use activities (e.g., passenger vehicles, pets, and landscape maintenance), distant aircraft flyovers (the Santa Monica Airport is located approximately 1.5 miles northeast of the current Metro facility), and general commercial use-related activities east along Main Street such as delivery truck circulation and refuse collection.

To determine the existing ambient sound level within the area that may be affected by project construction and long-term operations, long-term noise monitoring was conducted at four positions, located immediately north, south, east, and west of the project site. These locations were selected based on their ability to provide a representative characterization of the noise

Table IV.H-3

WEST LOS ANGELES TRANSPORTATION FACILITY
CALCULATED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Roadway Segment	Adjacent Land Use	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way [a]		
		Adjacent	50 Feet	100 Feet
La Cienega, North of Jefferson Boulevard	Commercial Frontage/Residential	72.8	61.8	59.6
Jefferson Boulevard, South of National Boulevard	Industrial	70.9	66.1	63.9
Jefferson Boulevard, West of La Cienega Boulevard	Industrial/Park	70.9	66.1	63.9

[a] *Calculated using roadway noise equations provided in the TeNS document and traffic data provided by the Project traffic consultant.*

Source: PCR Services Corporation, 2004.

conditions surrounding the project site. Each of the four monitoring positions are discussed below and depicted in Figure IV.H-4 on page 293:

- Receiver Location 1 (R1): The sound level meter was placed on the eastern boundary of the project site (twelve feet from the Main Street curb), approximately 200 feet south of Sunset Avenue. Roadway traffic along Main Street was the dominant noise source at this receiver location. In addition, the high volume of transit buses that enter and leave the Metro maintenance facility during the late night and pre-dawn hours has a measurable effect on the CNEL reading at this measurement location.

- Receiver Location 2 (R2): The sound level meter was placed west of the project site across Pacific Avenue (five feet from the curb), approximately 220 feet south of Sunset Avenue. Roadway traffic along Pacific Avenue was the dominant noise source at this receiver location. In addition, as this receiver location is directly across from the VA Memorial Mural, the overall noise level may have been marginally affected due to sound reflection.

- Receiver Location 3 (R3): The sound level meter was placed north of the project site across Sunset Avenue (21 feet from the curb), approximately 50 feet west of Main Street. Roadway traffic along Main Street, although reduced by distance attenuation and barrier insertion loss attenuation, was the dominant noise source at this receiver location. In addition, the high volume of transit buses that enter and leave the Metro maintenance facility during the late night and pre-dawn hours would have a measurable effect on the CNEL reading at this measurement location.

LEGEND

R# Noise Monitoring Location

Sensitive Receiver Location

Project Site

Source: Landiscor, 2004

PCR

Figure IV.H-4
Sunset Avenue Project
Noise Monitoring Positions and Sensitive Receiver Locations

- Receiver Location 4 (R4): The sound level meter was placed south of the project site across Thornton Place (five feet from the curb), approximately 220 feet west of Main Street. Roadway traffic along Main Street, although reduced by distance attenuation and barrier insertion loss attenuation, was the dominant noise source at this receiver location.

These locations were selected based on their ability to provide a representative characterization of the noise conditions surrounding the project site. A summary of noise measurement data is provided in Table IV.H-4 on page 295. As shown in Table IV.H-4, ambient noise levels at all residential land use locations, as characterized by noise measurement data, exceed the presumed ambient noise levels indicated earlier in Table IV.H-1 on page 290.

The CNEL generated by existing traffic on local roadways was established using roadway noise equations provided in the TeNS document and traffic data provided by the project traffic consultant. In accordance with TeNS, the peak hour traffic volume was assumed to be ten percent of the ADT volume. Consideration was given to the roadway configuration, percentage of 2-axle and 3-axle trucks, posted vehicle speed, and right-of-way distance (property line) to calculate traffic noise levels. Table IV.H-5 on page 296 provides the CNEL for the analyzed roadway segments in the project vicinity and along the bus route. As shown in Table IV.H-5, the calculated CNEL resulting from existing traffic ranged from 53.6 dBA to 67.2 dBA at a reference distance of 50 feet along the analyzed roadway segments. Note that the modeled roadway noise level for the roadway segments of Main Street between Sunset Avenue and Thornton Place and Pacific Avenue between Sunset Avenue and Windward Avenue, are a few decibels lower than the monitored noise levels disclosed earlier in Table IV.H-4. This is because the ambient noise environment is affected by roadway, as well as other noise sources, and these modeled noise levels only consider the mobile-source noise component.

(c) Vibration-Sensitive Receiver Locations

Residential uses immediately north of Sunset Avenue, east of Main Street, south of Thornton Place, and west Pacific Avenue are within the area of potential effect for perceptible vibration during project construction. With respect to structures, vibration-sensitive receivers generally include historic buildings, buildings in poor condition, and uses that require precision instruments (e.g., operating rooms or scientific laboratories). No vibration-sensitive structures or uses are present within the area that may be affected by the project.

(d) Existing Ground-Borne Vibration Environment

The only source of ground-borne vibration in the project vicinity is vehicular travel (refuse trucks, delivery trucks, school buses, and transit buses) on local roadways. These sources of existing ground-borne vibration levels within the project vicinity are negligible.

Table IV.H-4

SUNSET AVENUE PROJECT
SUMMARY OF AMBIENT NOISE MEASUREMENT DATA (dBA) [a]

Measurement Location	Daytime Hourly Ambient L_{eq} [b]			Nighttime Hourly Ambient L_{eq} [b]			
	Avg.	Min.	Max.	Avg.	Min.	Max.	CNEL
R1 – Adjacent to Main Street, Immediately East of Project Site [c]	70.9	68.1	76.8	65.1	53.7	71.5	74.5
R2 – Adjacent to Pacific Avenue, Immediately West of Project Site [c]	71.4	67.9	72.8	64.5	55.7	70.1	73.1
R3 – Adjacent to Sunset Avenue, Immediately North of Project Site [d]	63.1	59.6	65.7	57.4	48.1	62.8	66.1
R4 – Adjacent to Thornton Place, Immediately South of Project Site [d]	61.6	55.8	64.8	54.2	45.8	60.3	63.9

[a] *Based on ambient sound measurements conducted using a Larson-Davis 820 Type 1 Integrating Sound Level Meter. Noise measurement data is provided in Appendix E.*
[b] *Daytime hours are from 7 A.M. to 10 P.M., and nighttime hours are from 10 P.M. to 7 A.M.*
[c] *Measurement period (April 28 to May 3, 2004).*
[d] *Measurement period (April 26-28, 2004).*

Source: PCR Services Corporation, 2004.

c. Regulatory Framework

Many government agencies have established noise standards and guidelines to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise. Standards and guidelines that may be applicable to this project are discussed below.

(1) Applicable Federal Policies

(a) Noise

The United States Department of Housing and Urban Development (HUD) has set a goal of 45 dBA L_{dn} as a desirable maximum interior noise standard for HUD-assisted residential units. This same noise level is also generally accepted within the State of California. While HUD does not specify acceptable exterior noise levels, standard construction of residential dwellings constructed under Title 24 standards typically provide 20 dBA of attenuation with the windows closed. Based on this attenuation, the exterior L_{dn} should not exceed 65 dBA.[162]

[162] *The day-night average level (L_{dn}) is the average equivalent A-weighted sound level during a 24-hour day, obtained after addition of ten decibels to sound levels during the night time from 10 P.M. to 7 A.M. The 10 decibel penalty is applied to account for increased noise sensitivity during the nighttime hours. The L_{dn} represents the daily energy noise exposure averaged on an annual basis.*

Table IV.H-5

SUNSET AVENUE PROJECT
CALCULATED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Roadway Segment	Adjacent Land Use	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way [a, b]		
		Adjacent	50 Feet	100 Feet
Sunset Avenue, Between Main Street and Pacific Avenue	Residential	58.9	53.6	51.2
Main Street, between Sunset Avenue and Thornton Place	Residential/industrial	68.8	64.8	62.8
Main Street, between Thornton Place and Abbot Kinney Boulevard	Residential/commercial	69.5	65.5	63.5
Abbot Kinney Boulevard, between Main Street and Venice Boulevard	Residential/commercial	68.0	63.3	61.1
Pacific Avenue, between Sunset Avenue and Windward Avenue	Residential	71.0	65.9	63.6
Pacific Avenue, between Windward Avenue and Venice Boulevard (North)	Residential/commercial	68.5	63.8	61.6
Venice Boulevard (North), between Abbot Kinney Boulevard and Pacific Avenue	Residential	62.9	58.2	56.0
Venice Boulevard (South) between Abbot Kinney Boulevard and Pacific Avenue	Residential	64.0	59.3	57.1
Pacific Avenue, between Rose Avenue and Sunset Avenue	Residential	72.1	67.0	64.7
Main Street, between Ocean Park Boulevard and Rose Avenue	Commercial/industrial	68.7	64.7	62.7
Main Street, between Rose Avenue and Sunset Avenue	Residential/open space	68.7	64.7	62.7
Nielson Way/Pacific Avenue, between Ocean Park Boulevard and Rose Avenue	Residential/commercial	72.3	67.2	64.9
Rose Avenue, between Main Street and Lincoln Boulevard	Residential/commercial/ industrial	66.8	62.1	59.9

[a] *Calculated using roadway noise equations provided in the TeNS document and traffic data provided by the Project traffic consultant.*
[b] *Does not account for non-transportation noise sources.*

Source: PCR Services Corporation, 2004.

(b) Ground-Borne Vibration

There are no federal standards for ground-borne vibration; however, the FTA has established a PPV threshold of 0.2 inch per second for vibration in proximity to fragile buildings.

(2) Applicable State Policies

(a) Noise

The California Department of Health Services (CDHS) has studied the correlation of noise levels and their effects on various land uses. As a result, the CDHS has established four categories for judging the severity of noise intrusion on specified land uses: normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable. An exterior noise level up to 60 dBA CNEL is "normally acceptable" for low-density residential uses, without special noise insulation requirements. A noise level between 60 CNEL and 70 CNEL is considered "conditionally acceptable" for low-density residential uses, while a noise level of 75 dBA CNEL or more is identified as "clearly unacceptable" for all residential uses.

(b) Ground-Borne Vibration

There are no adopted State policies or standards for ground-borne vibration. The traditional view has been that common vibrations related to roadway traffic and construction activities pose no threat to buildings or structures. However, Caltrans does recommend that extreme care be taken when sustained pile driving occurs within 7.5 meters (25 feet) of any building, and 15-30 meters (50-100 feet) of a historic building or a building in poor condition.

(3) Applicable City of Los Angeles Policies and Regulations

(a) Noise

General Plan Noise Element. As required under Section 65302(f) of the California Government Code, each community shall prepare and adopt a comprehensive long-range General Plan for its physical development containing seven mandatory elements, including a Noise Element. The Noise Element shall: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels. City of Los Angeles Noise Element policies that relate to the proposed project include the following:[163]

[163] *Noise Element of the Los Angeles City General Plan, Adopted February 3, 1999.*

- Policy 2.2 – Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise, and alleviate noise that is deemed a public nuisance.

- Policy 3.1 – Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

In addition, the Noise Element establishes a set of community noise exposure/land use compatibility guidelines (refer to Table IV.H-6 on page 299) which characterizes the exterior noise level as "normally acceptable," "conditionally acceptable," "normally unacceptable," or "clearly unacceptable," depending on each particular land use's sensitivity to community noise.

Los Angeles Municipal Code. The City of Los Angeles Noise Regulation is provided in Chapter 11 of the LAMC. Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. These procedures recognize and account for perceived differences in the nuisance level of different types of noise and/or noise sources. Specifically, the procedures provide for a penalty of 5 dBA for steady high-pitched noise or repeated impulsive noises. Conversely, the procedures provide a credit of 5 dBA for noise occurring less than 15 minutes in a period of 60 consecutive minutes during the day, as short-term noise events are typically less of a nuisance than sustained noise levels. A noise-event duration of 15 minutes during a one-hour period would be equivalent to L_{25}, while a noise event duration of 5 minutes during a one-hour period would be equivalent to L_8.

The LAMC indicates that in cases where the actual measured ambient conditions are not known or are less than 50 dBA, the presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels defined in Section 111.02 of the LAMC should be used. For residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 40 dBA during the nighttime.

Section 112.05 of the LAMC sets a maximum noise level for powered equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is only required where "technically feasible."[164] Section 41.40 of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. In general, the City of Los Angeles Department of Building and Safety enforces noise ordinance provisions relative to

[164] *In accordance with the City of Los Angeles Noise Ordinances, "technically feasible" means that the established noise limitations cannot be complied with at a project site, despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.*

Table IV.H-6

CITY OF LOS ANGELES LAND USE COMPATIBILITY FOR COMMUNITY NOISE

	Community Noise Exposure CNEL, dBA			
Land Use	**Normally Acceptable**	**Conditionally Acceptable**	**Normally Unacceptable**	**Clearly Unacceptable**
Single Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	Above 70
Multi-Family Homes	50 – 65	60 – 70	70 – 75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	Above 80
Transient Lodging – Motels, Hotels	50 – 65	60 – 70	70 – 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 – 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 – 75	—	Above 70
Playgrounds, Neighborhood Parks	50 – 70	—	67 – 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 75	—	70 – 80	Above 80
Office Buildings, Business and Professional Commercial	50 – 70	67 – 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	Above 75	—

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: L.A. CEQA Thresholds Guide, adopted August 2001.

equipment and the Los Angeles Police Department enforces provisions relative to noise generated by people.

In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to: (1) radios, television sets, and similar devices defined in LAMC Section 112.01; (2) air conditioning, refrigeration, heating, pumping, filtering equipment defined in LAMC

Section 112.02; (3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices defined in LAMC Section 112.04; and (4) on-site motor driven as defined in LAMC Section 114.02.

(b) Ground-Borne Vibration

There are no adopted City of Los Angeles policies or standards for ground-borne vibration.

(4) Applicable City of Culver City Policies and Regulations[165]

(a) Noise

(i) General Plan Noise Element

The Culver City General Plan Noise Element does not identify neighborhood parks as a noise sensitive use; however, the Noise Element does indicate a design standard of 65 dBA CNEL for parks/open space. With regard to community noise exposure and land use compatibility for parks/open space, the Noise Element categorizes noise exposure of less than 65 dBA CNEL to be "clearly compatible," noise exposure of 65 dBA CNEL to 70 dBA CNEL to be "compatible with mitigation," noise exposure of 70 dBA CNEL to 75 dBA CNEL to be "normally incompatible," and noise exposure greater than 75 dBA CNEL to be "clearly incompatible" (refer to Table IV.H-7 on page 301).

2. ENVIRONMENTAL IMPACTS

a. Methodology

(1) On-Site Construction Noise

Construction noise impacts were evaluated by determining the noise levels generated by construction activity, calculating the construction-related noise level at surrounding residential property locations, and comparing construction-related noise to ambient noise levels (i.e., noise levels without construction noise) to determine significance.

[165] *The Syd Kronenthal Park is the only Culver City land use that has potential to experience significant project-generated noise impacts. As such, relevant language from the City's General Plan Noise Element is included herein. All other Culver City land use designations are located outside of project's area of potential effect to cause significant noise impacts.*

Table IV.H-7

CULVER CITY LAND USE/NOISE COMPATIBILITY MATRIX

Proposed Land Use Categories		Compatibility Land Use Zones, CNEL, dBA						
Categories	**Uses**	**<55**	**55-60**	**60-65**	**65-70**	**70-75**	**75-80**	**>80**
Residential	Single-Family, Duplex, Multiple-Family	A	A	B	B	C	D	D
Residential	Mobile Homes	A	A	B	C	C	D	D
Residential	Hotel, Motel, Transient Lodging	A	A	B	B	C	C	D
Commercial	Commercial retail, Bank, Restaurant, Movie Theaters	A	A	A	A	B	B	C
Commercial Industrial Institutional	Office Buildings, Research and Development, Professional Offices, City Office Buildings	A	A	A	B	B	C	D
Commercial Institutional	Amphitheaters, Concert Halls, Auditoriums, Meeting Hall	B	B	C	C	D	D	D
Commercial	Children's Amusement Park, Miniature Golf Course, Go-Cart Track, Equestrian Center, Sport Club	A	A	A	B	B	D	D
Commercial Industrial Institutional	Automobile Service Station, Auto Dealership, manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B
Institutional	Hospitals, Churches, Libraries, Schools, Day Care	A	A	B	C	C	D	D
Open Space	Parks	A	A	A	B	C	D	D
Open Space	Golf Courses, Cemeteries, Nature Centers, Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C
Agriculture	Agriculture	A	A	A	A	A	A	A

Zone A – Clearly Compatible: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Zone B – Compatible with Mitigation: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Zone C – Normally Incompatible: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Zone D – Clearly Incompatible: New construction or development should generally not be undertaken.

Source: Culver City General Plan, Noise Element, 1996.

(2) Off-Site Roadway Noise

Roadway noise impacts were evaluated using TeNS methodology. This methodology allows the user to define roadway configurations, barrier information (if any), and receiver locations. Roadway-noise attributable to project development was calculated and compared to baseline noise levels that would occur under the "no project" condition to determine significance.

(3) Stationary Point-Source Noise

Stationary point-source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources such as rooftop mechanical equipment, outdoor recreational areas, etc., calculating the hourly L_{eq} noise level from each noise source at surrounding residential property locations, and comparing such noise levels to ambient noise levels to determine significance.

(4) Ground-Borne Vibration

Ground-borne vibration impacts were evaluated by identifying potential vibration sources, measuring the distance between vibration sources and surrounding structure locations, and making a significance determination.

b. Thresholds of Significance

(1) Construction Noise

The following thresholds of significance are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on noise levels from construction if: [166]

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at anytime on Sunday.

[166] *www.lacity.org/ead/EADWeb-AQD/Thresholds_PDF/noise.pdf, page I.1-3.*

Since the project construction period would have a duration of more than 10 days and would not occur between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at anytime on Sunday (consistent with provisions of the LAMC), noise during construction would have a significant impact if:

- Project construction activities cause the exterior ambient noise level to increase by 5 dBA or more at a noise sensitive use, which in the case of the subject project is the property line of any residence.

(2) General Noise from Project Operations

The following thresholds of significance will be applied to the proposed project as set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a significant impact related to operational noise would result if:

- The project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (refer to Table IV.H-6 on page 299 for descriptions of these categories); or

- The project causes any 5 dBA or greater noise increase.

With respect to land uses that are located within the City of Culver City, a significant impact related to operational noise would result if:

- The project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "compatible with mitigation," "normally incompatible" or "clearly incompatible" community noise exposure/land use compatibility category (refer to Table IV.H-7 on page 301 for descriptions of these categories); or

- The project causes any 5 dBA or greater noise increase.

(3) Ground-Borne Vibration

The City of Los Angeles does not have a specific significance threshold to assess vibration impacts. However, the FTA ground-borne vibration standard can be used to evaluate potential impacts related to project construction and operation. Therefore, impacts relative to ground-borne vibration would be considered significant if the following future event were to occur:

- Project construction or operations activities cause PPV ground-borne vibration levels to exceed 0.2 inch/second at any off-site structure.

c. Analysis of Project Impacts

(1) West Los Angeles Transportation Facility

(a) Construction-Period

(i) Noise

Noise impacts from construction activities occurring within the project site would be a function of the noise generated by construction equipment, the equipment location, and the timing and duration of the noise-generating activities. Construction activities are anticipated to begin in March of 2005 and conclude in June of 2006, and include six stages: (1) demolition; (2) site clearing and grading; (3) foundation construction; (4) building construction; and (5) finishing and cleanup. Each stage involves the use of different kinds of construction equipment and, therefore, has its own distinct noise characteristics. Demolition would involve the use of backhoes, front-end loaders, and heavy-duty trucks. Site clearing will typically require the use of earth moving equipment, such as scrapers, backhoes, front-end loaders, and heavy-duty trucks. Foundation construction generally requires the use of concrete trucks, cranes, pneumatic tools, and possibly, use of an impact pile driver. Building construction typically involves the use of hammers, generators, compressors, and delivery trucks. Finishing and site cleanup activities generally require the use of trucks, landscape rollers, and compactors.

Project construction would require the use of mobile heavy equipment with high noise level characteristics. Individual pieces of construction equipment that would be used for project construction produce maximum noise levels of 74 dBA to 91 dBA at a reference distance of 50 feet from the noise source, as shown in Table IV.H-8 on page 305. In the event that pile driving is required, noise could reach a level as high as 101 dBA at the 50-foot reference distance. These maximum noise levels would occur when equipment is operating under full power conditions or during "impact" activities such as percussive pile driving. However, equipment used on construction sites often operates under less than full power condition, or part power. Actual measurements performed while equipment is performing work indicate that shift-long equivalent L_{eq} sound levels are typically 2 dBA to 15 dBA less than the maximum noise levels identified in Table IV.H-8.[167]

[167] *Beranek and Ver, Noise and Vibration Control Engineering, Principles and Applications, p. 652, 1992.*

Table IV.H-8

MAXIMUM NOISE LEVELS GENERATED BY TYPICAL CONSTRUCTION EQUIPMENT

	Sound Levels at Maximum Engine Power with Mufflers at Indicated Distance (dBA)			
Type of Equipment	**25 feet**	**50 feet**	**100 feet**	**200 feet**
Air Compressor	87	81	75	69
Backhoe	91	85	79	73
Backup Beep	91	85	79	73
Concrete Mixer	91	85	79	73
Crane, Mobile	89	83	77	71
Dozer	86	80	74	68
Grader	91	85	79	73
Jack Hammer	94	88	82	76
Loader	85	79	73	67
Paver	95	89	83	77
Pneumatic Tool	91	85	79	73
Pump	82	76	70	64
Roller	80	74	68	62
Saw	84	78	72	66
Scraper	94	88	82	76
Truck	97	91	85	79
Impact Pile Driver (peak)	107	101	95	89
Minimum Sound Level	80	74	68	62
Maximum Sound Level	107	101	95	89

Assumes a drop-off rate of 6-dB per doubling of distance, which is appropriate for use in characterizing point-source (such as construction equipment) sound attenuation over a hard surface propagation path.

Source: USEPA, Bolt, Beranek, and Newman, Noise Control for Buildings and Manufacturing Plants, 1987; and PCR Services Corporation, 2004.

To more accurately characterize construction-period noise levels, the average (L_{eq}) noise level associated with each construction stage is provided in Table IV.H-9 on page 306. These average noise levels are based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage, and is typically attributable to multiple pieces of equipment operating simultaneously. As shown in Table IV.H-9, the average construction-period noise level is expected to range from 77 dBA to 86 dBA at a reference distance of 50 feet. For project-long (i.e., total duration of construction activity) L_{eq} noise levels, these conservative worst-case noise values would be reduced to account for the percentage of time that equipment actually operate on the construction site.[168]

[168] *Ibid.*

Table IV.H-9

CONSTRUCTION AVERAGE L_{eq} NOISE LEVELS BY DISTANCE AND CONSTRUCTION STAGE

	Sound Level in dBA (L_{eq}) at Indicated Distance				
Construction Stage	**25 Feet**	**50 Feet**	**100 Feet**	**150 Feet**	**200 Feet**
Ground Clearing	88	82	76	72	70
Grading/Excavation	92	86	80	76	74
Foundations	83	77	71	67	65
Structural	89	83	77	73	71
Finishing	92	86	80	76	74

Assumes a hard surface propagation path drop-off rate of 6-dB per doubling of distance, which is appropriate for use in characterizing point-source (such as construction equipment) sound attenuation.

Source: EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971; and PCR Services Corporation, 2004.

Using the conservative industry standard sound attenuation rate of 6 dB per doubling of distance for point sources (e.g., construction equipment), the worst-case construction-period noise level of 86 dBA at a distance of 50 feet (cited previously) would be approximately 80 dBA at 100 feet, and 74 dBA at 200 feet. As such, when construction activities occur along or near the project site perimeter, the worst-case noise level would be reduced to approximately 62 dBA L_{eq} (1-hour) during periods of site grading and building construction/finishing at areas within the Syd Kronenthal Park based on sound-distance attenuation alone. Due to intervening structures that are present between the project site the Syd Kronenthal Park, construction noise levels would be reduced by an additional 5 dBA or more due to barrier insertion loss, to a level of 57 dBA L_{eq} or less. When added to the existing daytime ambient noise level of 60 dBA, this would result in a marginal noise level increase of 2 dBA L_{eq}. With respect to the level of noise increase when compared to baseline ambient conditions, the Blair Hills residences that have a direct line of sight to the project site would experience the worst-case noise impact, where the ambient noise level would increase by a maximum of 3 dBA during periods of site grading and building construction/finishing, from 52 dBA to 55 dBA. A summary of noise level increases by receiver location and phase of construction activity is provided in Table IV.H-10 on page 307. As shown therein, noise from construction would not cause the ambient noise level to increase by the 5-dBA significance criterion at any sensitive receiver location. As such, construction-period noise impacts would be less than significant and no mitigation measures are required.

(ii) Ground-Borne Vibration

Project construction can generate varying degrees of ground-borne vibration, depending on the construction procedures and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site

Table IV.H-10

WEST LOS ANGELES TRANSPORTATION FACILITY ESTIMATE OF NOISE IMPACTS DURING CONSTRUCTION

		Construction-Period Noise Level (L_{eq}) by Construction Phase									
		Ground Clearing		Grading/ Excavation		Foundations		Structural		Finishing	
Receiver Location	Daytime Ambient Sound Level L_{eq}	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient
Syd Kronenthal Park	60	61	1	62	2	60	—	61	1	62	2
Cameo Woods Condominium Property	60	60	—	61	1	60	—	60	—	61	1
Residential East of La Cienega	60	60	—	60	—	60	—	60	—	60	—
Residential Adjacent to Syd Kronenthal Park	60	60	—	60	—	60	—	60	—	60	—
Residential Northeast of La Cienega/Jefferson	60	60	—	60	—	60	—	60	—	60	—
Blair Hills Community	52	53	1	55	3	53	1	54	2	55	3

Source: PCR Services Corporation, 2004; Calculation worksheets provided in Appendix E.

often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach the levels that damage structures. The FTA has published standard vibration velocities for construction equipment operations. The peak particle velocities for construction equipment pieces expected to be used during project construction are listed in Table IV.H-11 on page 309.

In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inch/second) appears to be conservative even for sustained pile driving. Pile driving levels often exceed 0.2 inch/second at distances of 50 feet, and 0.5 inch/second at 25 feet without any apparent damage to buildings.[169] Based on the ground-borne vibration data provided in Table IV.H-11, vibration velocities from the operation of construction equipment would range from approximately 0.003 to 0.644 inch/sec PPV at 25 feet from the source of activity. At 75 feet from the source of activity, vibration velocities range from approximately 0.001 to 0.131 inch/sec PPV. With regard to the proposed Transportation Facility, ground-borne vibration would be generated primarily during site clearing and grading activities on-site and by off-site haul-truck travel. In addition, project construction may require pile driving during the foundation phase. The PPV from bulldozer and heavy truck operations is shown to be 0.089 PPV and 0.076 PPV, respectively, at a distance of 25 feet. With respect to impact pile driving, no structures are present within 75 feet of potential pile driving activity, and the PPV from impact pile driving at 75 feet would be approximately 0.124 inch/sec. As each of these values is below the 0.2 inch/sec PPV significance threshold, and no vibration-sensitive receivers are located within 25 feet of major construction activity or within 75 feet of potential pile driving activity, vibration impacts associated with construction would be less than significant and no mitigation measures are required.

(b) Operations-Period

(i) Noise

This section considers all potential noise and ground-borne vibration impacts related to the long-term operations of the proposed Transportation Facility, following completion of construction, to neighboring noise-sensitive areas. Specific noise sources considered herein include bus traffic volumes, idling buses, backup alarm beeps, a bus wash operation, and air compressor machines.

[169] *Caltrans Technical Advisory Number TAV-02-01-R9601, Transportation Related Earthborne Vibrations, February 20, 2002.*

Table IV.H-11

TYPICAL VIBRATION VELOCITIES FOR POTENTIAL PROJECT CONSTRUCTION EQUIPMENT

Equipment	Approximate Peak Particle Velocity at 25 ft, inch/second	Approximate Peak Particle Velocity at 75 ft, inch/second
Impact pile driver	0.644	0.124
Sonic pile driver	0.170	0.033
Large bulldozer	0.089	0.017
Caisson drilling	0.089	0.017
Loaded trucks	0.076	0.015
Jackhammer	0.035	0.007
Small bulldozer	0.003	0.001

Source: USDOT Federal Transit Administration, 1995.

According to the traffic study, the project is expected to generate an additional 1,247 daily trips with 79 and 67 trips occurring during the morning and evening commute hours, respectively. To ascertain the roadway noise impact that would result due to these additional traffic volumes, two analyses were conducted: (1) to determine potential noise impacts in terms of CNEL; and (2) to identify the maximum noise increase in terms of L_{eq} (1-hour) noise levels.

Table IV.H-12 on page 310 provides the worst-case noise impacts for the analyzed roadway segments in the City of Los Angeles in terms of CNEL. The noise levels are provided for the following conditions: existing conditions, year 2006 "without project," and year 2006 "with project." Also included in Table IV.H-12 is the roadway noise level increase attributable to project-generated and cumulative traffic volumes. As shown, the largest roadway noise impact from the Transportation Facility is anticipated to occur along the segments of Jefferson Boulevard, west of La Cienega Boulevard and south of National Boulevard, where project-related traffic volumes would cause overall roadway noise to increase by 3.2 dBA, from 66.1 dBA to 69.3 dBA CNEL at a distance of 50 feet from the right-of-way. The only land uses that are located within this 69.3 dBA CNEL noise contour are the light-industrial uses along Jefferson Boulevard and the Ballona Creek channel, which are located within the Los Angeles city limits.

Per City of Los Angeles land use compatibility guidelines (refer to Table IV.H-6 on page 299), the "normally acceptable" CNEL exposure for industrial uses is 50 dBA to 75 dBA CNEL. Since 69.3 dBA CNEL is considered a normally acceptable noise exposure for light-industrial uses, and noise level increases would not exceed the 5-dBA significance criterion that applies when noise exposure would remain within a level considered normally acceptable, impacts are considered less than significant and no mitigation measures are required.

Table IV.H-12

WEST LOS ANGELES TRANSPORTATION FACILITY
ROADWAY NOISE IMPACTS AT 50 FEET FROM RIGHT-OF-WAY [a]

Roadway Segment	Existing dBA CNEL	Future No-Project dBA CNEL	Future with Project dBA CNEL	Project Increment [b]	Cumulative Increment [c]
La Cienega Boulevard, North of Jefferson Boulevard	61.8	62.3	63.4	1.1	1.6
Jefferson Boulevard, South of National Boulevard	66.0	66.1	69.3	3.2	3.3
Jefferson Boulevard, West of La Cienega Boulevard	66.0	66.1	69.3	3.2	3.3

[a] *Exterior CNEL noise levels related to transportation-source noise only.*
[b] *Increase relative to traffic noise levels comparing future pre-project conditions to future with development of the proposed project.*
[c] *Increase relative to traffic noise levels comparing existing conditions to future with development of the proposed project, which includes ambient growth and related project traffic volumes.*

Source: PCR Services Corporation, 2004.

The Syd Kronenthal Park is also located along the proposed transit bus route, across the Ballona Creek channel approximately 200 feet north-northwest of the Jefferson Boulevard right-of-way in the City of Culver City. This receiver location was also evaluated for roadway noise impacts, during which the CNEL noise exposure was calculated based on existing, future no project, and future with project traffic volume conditions to ascertain the roadway noise impact attributable to project and cumulative project traffic volumes. Based on modeled traffic data, the roadway noise contribution to CNEL exposure at the Syd Kronenthal Park was established to be 58.5 dBA CNEL, which is consistent with the noise measurement data presented earlier in Table IV.H-2 on page 291.[170] The future no project and future with project roadway noise levels were established to be 58.7 dBA CNEL and 61.8 dBA CNEL, respectively. As such, the roadway noise level increase attributable to project and cumulative project traffic volumes would be 3.1 dBA and 3.3 dBA, respectively.

Per City of Culver City land use compatibility guidelines, a noise level exposure as high as 65 dBA CNEL is considered "clearly compatible" for park uses. Since 61.8 dBA CNEL is considered a clearly compatible noise exposure for park uses, and noise level increases would not exceed the 5-dBA significance criterion that applies when noise exposure would remain

[170] *The measured noise level of 60.3 dBA CNEL accounted for roadway noise, as well as other noise sources such recreation activity, lawn maintenance, etc. The 58.5 dBA CNEL presented here accounts for roadway noise only.*

within a level considered clearly compatible, impacts are considered less than significant and no mitigation measures are required.

To determine impacts with respect to worst-case hourly L_{eq}, the condition where project-related traffic volumes (in terms of equivalent vehicles) would comprise the highest percentage of total roadway traffic volumes was compared to the "no project" condition. This condition would occur during the 4:00 A.M. hour along the proposed bus route (i.e., Jefferson Boulevard north of the project site and west of La Cienega Boulevard, and La Cienega Boulevard north of Jefferson Boulevard). The closest noise-sensitive receiver location to the proposed bus route is the Syd Kronenthal Park; however, the park would not be in use during the 4:00 A.M. hour. Therefore, the residential uses situated immediately north and west of the park, as well as the residential uses situated behind the commercial frontage on the east side of La Cienega Boulevard (north of Jefferson Boulevard), are the closest noise-sensitive uses that have the potential to experience noise impacts from bus route traffic volumes during the 4:00 A.M. hour.

When added to the nighttime average ambient noise levels of 51.6 dBA (residential uses adjacent to the park) and 52.9 dBA (residential uses east of La Cienega Boulevard, north of Jefferson Boulevard), Project-related traffic volumes during the 4:00 A.M. hour would result in an increase of 2.9 dBA and 4.9 dBA to the nighttime noise environment, respectively, at these sensitive receiver locations. Potential noise increases in all of the remaining hours would be substantially less. As these noise level increases would not exceed the 5-dB significance criterion, worst-case hourly L_{eq} roadway noise impacts would be less than significant. No mitigation measures are required.

Stationary-Source Noise. On-site operational noise sources would include noise from employees and cars that enter and leave the parking deck during the late night and early morning hours, idling buses, backup alarm beeps, a bus wash operation, and air compressor machines. Parking deck-related noise, although intermittent and short-term in nature, may be intermittently audible to nearby sensitive land uses. A summary of maximum noise levels related to typical parking facility-related noise events is provided in Table IV.H-13 on page 312. As shown therein, the composite noise level from all individual noise sources, when averaged over a one-hour time period would be approximately 60 dBA L_{eq} (1-hour) at a reference distance of 50 feet. However, this noise level would be reduced by two to three dBA due to barrier insertion loss provided by the approximately 3-foot perimeter parapet wall.

Noise levels from maintenance yard operations sources were provided by the Metro, which were derived from actual sound measurements conducted at the Division 6 Maintenance Facility.[171] The noisiest of these activities was determined to be an idling bus in reverse with

[171] *MTA, Noise Impact Evaluation and Sound Wall Design, MTA Division 6 Bus Maintenance Facility, April 2002.*

Table IV.H-13

TYPICAL MAXIMUM NOISE LEVEL FROM INDIVIDUAL PARKING STRUCTURE-RELATED NOISE EVENTS

Source	Reference Sound Level [a]	Reference Distance	Maximum Sound Level at 50 Feet [b]	Frequency of Occurrence	1-Hour L_{eq} Noise Level at 50 Feet
Automobile at 14 mph	65 dBA	25 feet	59 dBA	50 percent	56 dBA
Car Alarm	75 dBA	25 feet	69 dBA	1 percent	49 dBA
Car Horn	75 dBA	25 feet	69 dBA	0.5 percent	46 dBA
Door Slam	70 dBA	25 feet	64 dBA	5 percent	51 dBA
Tire Squeal	80 dBA	10 feet	70 dBA	10 percent	56 dBA
Composite L_{eq} (1-hour)					**60 dBA**

[a] *Reference noise levels are based on actual measurement data.*
[b] *Since parking structure-related noise is more akin to a point-source, rather than a line-source, the 6-dBA per doubling of distance attenuation factor was used to distance-adjust all reference noise levels.*

Source: PCR Services Corporation, 2004.

backup alarm engaged, which registered a sound volume of 78 dBA at a reference distance of 25 feet. As such, simultaneous noise from four idling buses with backup alarm systems engaged would register a sound level of approximately 84 dBA at a reference distance of 25 feet. This 84-dBA noise level at a reference distance of 25 feet was used below in performing the worst-case point-source (facility) noise analysis.

Based on the standard sound-distance attenuation rate of 6 dBA per doubling of distance, the 84 dBA sound level characterized above at a reference distance of 25 feet would be approximately 54 dBA at 750 feet, which is the distance to the closest noise-sensitive use (i.e., the Syd Kronenthal Park) to the proposed site location. When barrier insertion loss is considered, to account for the presence of intervening structures, on-site noise sources would attenuate to approximately 49 dBA at the Syd Kronenthal Park, which when combined with the daytime and nighttime ambient noise levels of 60.4 dBA and 51.6 dBA, respectively, would result in marginal increases of 0.3 dBA and 1.9 dBA to the daytime and nighttime ambient sound levels, respectively.

The nearest Blair Hills residence location that has a direct line-of-sight to the project site is also the noise-sensitive location that recorded the lowest average ambient noise levels of 51.8 dBA L_{eq} (daytime) and 47.7 dBA L_{eq} (nighttime). The reference noise level characterized above (i.e., 84 dBA at 25 feet) would be approximately 44 dBA at the above-mentioned Blair Hills residence. When added to the baseline daytime and nighttime ambient noise levels of 51.8 dBA and 47.7 dBA, respectively, this would result in a marginal increase of 0.7 dBA and 1.5 dBA to the daytime and nighttime ambient sound level, respectively. Noise level increases

will be less at all other noise-sensitive receiver locations due to greater sound-distance attenuation benefit and/or higher baseline ambient sound conditions. As noise level increases would not exceed the 5-dB significance criterion, impacts related to on-site facility noise levels would be less than significant. No mitigation would be necessary.

(ii) Ground-Borne Vibration

Future ground-borne vibration in the project vicinity will continue to be generated by vehicular travel on the local roadways. Project operation would not result in any additional long-term ground-borne vibration sources, and therefore would not cause ground-borne vibration levels to exceed the 0.2 inch per second PPV significance threshold at any receiver location. Rubber-tire vehicles, such as transit buses, rarely create ground-borne vibration problems unless there is a discontinuity or bump in the road that causes the vibration.[172] As such, impacts would be less than significant and no mitigation measures are required.

(2) Sunset Avenue Project

(a) Construction-Period

(i) Noise

Noise impacts from construction activities occurring within the project site would be a function of the noise generated by construction equipment, the equipment location, and the timing and duration of the noise-generating activities. Construction activities are anticipated to begin in June of 2006 and conclude in June of 2008, and include five stages: (1) demolition; (2) site clearing, grading, and excavation; (3) foundation and subterranean parking facility construction; (4) building construction; and (5) finishing and cleanup. Each stage involves the use of different kinds of construction equipment and, therefore, has its own distinct noise characteristics. Demolition would involve the use of backhoes, front-end loaders, and heavy-duty trucks. Site clearing, grading, and excavation will typically require the use of earth moving equipment, such as excavators, backhoes, front-end loaders, and heavy-duty trucks. Foundation and subterranean parking facility construction will likely require the use of concrete trucks, cranes, pneumatic tools, and possible use of driven piles. Building construction typically involves the use of hammers, generators, compressors, and delivery trucks. Finishing and site cleanup activities generally require the use of trucks, landscape rollers, and compactors.

Project construction would require the use of mobile heavy equipment with high noise level characteristics. Individual pieces of construction equipment that would be used for project

[172] *FTA, Transit Noise and Vibration Impact Assessment, 1995.*

construction produce maximum noise levels of 74 dBA to 91 dBA at a reference distance of 50 feet from the noise source, as previously shown in Table IV.H-8 on page 305. In the event that pile driving is required, noise could reach a level as high as 101 dBA at the 50-foot reference distance. These maximum noise levels would occur when equipment is operating under full power conditions or during "impact" activities such as pile driving. However, equipment used on construction sites often operates under less than full power condition, or part power. Actual measurements performed while equipment is performing work indicate that shift-long equivalent L_{eq} sound levels are typically 2 dBA to 15 dBA less than maximum noise levels presented in Table IV.H-8.[173]

As previously shown in Table IV.H-9 on page 306, the average (L_{eq}) noise level associated with each construction stage was provided to more accurately characterize construction-period noise levels. These average noise levels are based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage, and is typically attributable to multiple pieces of equipment operating simultaneously. As shown in Table IV.H-9, the average construction-period noise level is expected to range from 77 dBA to 86 dBA at a reference distance of 50 feet. For project-long (i.e., total duration of construction activity) L_{eq} noise levels, these conservative worst-case noise levels would be reduced to account for the percentage of time that equipment actually operates on the construction site.[174]

Using the conservative industry standard sound attenuation rate of 6 dB per doubling of distance for point sources (e.g., construction equipment), the worst-case construction-period noise level of 86 dBA at a distance of 50 feet (cited previously) during periods of site excavation and building construction/finishing would be about 80 dBA at 100 feet, and 74 dBA at 200 feet. As such, when construction activities occur along or near the project site perimeter, the worst-case noise level would be reduced to approximately 80 dBA L_{eq} (1-hour) at the residential properties that are located immediately north of the project site across Sunset Avenue, immediately east of the project site across Main Street, immediately south of the project site across Thornton Place; and immediately west of the project site across Pacific Avenue. When added to the existing daytime ambient noise levels that surround the project site (i.e., 62 dBA to 71 dBA L_{eq}), this would result in a noise level increase that ranges from 6 dBA to 18 dBA above baseline ambient noise level conditions. Areas farther away from the project site, such as the properties south of the project site along Royal Court, would receive a greater sound-distance attenuation benefit, as well as benefit from barrier insertion loss due to the presence of intervening structures, but noise level increases during periods of site excavation and building construction/finishing in these areas may still exceed the 5-dBA significance threshold. A summary of noise level increases by receiver location and phase of construction activity is

[173] *Beranek and Ver, Noise and Vibration Control Engineering, Principles and Applications, p. 652, 1992.*

[174] *Ibid.*

provided in Table IV.H-14 on page 316. As shown therein, noise during construction would cause the ambient noise level to increase by more than the 5-dB significance threshold in each of the above-mentioned areas. As such, noise impacts during construction would be significant.

(ii) Ground-Borne Vibration

Project construction can generate varying degrees of ground-borne vibration, depending on the construction procedures and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach the levels that damage structures. The FTA has published standard vibration velocities for construction equipment operations. The PPV for construction equipment pieces expected to be used during project construction were previously listed in Table IV.H-11 on page 309.

In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inch/second) appears to be conservative even for sustained pile driving. Pile driving levels often exceed 0.2 inch/second at distances of 50 feet, and 0.5 inch/second at 25 feet without any apparent damage to buildings.[175] Based on the ground-borne vibration data provided in Table IV.H-11, vibration velocities from the operation of construction equipment would range from approximately 0.003 to 0.644 inch/sec PPV at 25 feet from the source of activity. At 75 feet from the source of activity, vibration velocities range from approximately 0.001 to 0.131 inch/sec PPV. With regard to the proposed project, ground-borne vibration would be generated primarily during site clearing and grading activities on-site and by off-site haul-truck travel. In addition, project construction may require pile driving during the foundation phase. The PPV from bulldozer and heavy truck operations is shown to be 0.089 PPV and 0.076 PPV, respectively, at a distance of 25 feet. With respect to impact pile driving, the residential structures that are immediately south of Thornton Place, within approximately 250 feet of Main Street, are located approximately 50 to 65 feet of potential pile driving activity, where the PPV from impact pile driving could potentially exceed the 0.2 inch/sec significance threshold without incorporation of mitigation measures. All other structures that surround the project site are located outside the area of potential effect (i.e., more than 75 feet away) for ground-borne vibration impacts.

[175] *Caltrans Technical Advisory Number TAV-02-01-R9601, Transportation Related Earthborne Vibrations, February 20, 2002.*

Table IV.H-14

SUNSET AVENUE PROJECT ESTIMATE OF NOISE IMPACTS DURING CONSTRUCTION

Receiver Location	Daytime Ambient Sound Level L_{eq}	Construction-Period Noise Level (L_{eq}) by Construction Phase									
		Ground Clearing		Grading/Excavation		Foundations		Structural		Finishing	
		dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient
North of Project Site across Sunset Avenue	63	76	13	80	17	72	9	77	14	80	17
East of Project Site across Main Street	71	77	6	80	9	74	3	78	7	80	9
South of Project Site across Thornton Place	62	76	14	80	18	71	9	77	15	80	18
West of Project Site across Pacific Avenue	71	77	6	80	9	74	3	78	7	80	9
South of Project Site along Royal Court	57	61	4	63	6	58	1	61	4	63	6

Source: PCR Services Corporation, 2004; Calculation worksheets provided in Appendix E.

(b) Operations-Period

(i) Noise

This section evaluates potential impacts to neighboring noise-sensitive properties that may result from project-generated noise sources associated with the long term operation of the project. However, the noise environment that currently exists surrounding the project site would also impact the proposed project development. As indicated by the noise measurement data presented earlier in Table IV.H-4 on page 295, the project site is currently exposed to noise levels that range from 63.9 dBA to 74.5 dBA CNEL, due primarily to roadway traffic volumes along Pacific Avenue and Main Street, that currently exceed the City-recommended noise standard (i.e., 65 dBA CNEL) for the siting of multi-family residential dwelling units. With respect to land use compatibility and the existing community noise environment, the siting of residential uses on the project site could result in a significant impact without incorporation of mitigation measures.

Roadway Noise. According to the traffic study, the project is expected to generate an additional 1,168 daily trips with 107 and 174 trips occurring during the A.M. and P.M. peak hours, respectively. Access would be provided by a driveway on Sunset Avenue to serve the residential project component; and by a driveway on Main Street to serve the non-residential project component. The roadway noise impacts analysis included an evaluation of roadway noise related to existing conditions, year 2008 "without project" conditions, and year 2008 "with project" conditions. Based on these analyses, the roadway noise level increase attributable to project-generated and cumulative traffic volumes was ascertained.

Table IV.H-15 on page 318 provides a summary of worst-case noise impacts. As shown therein, the largest roadway noise impact attributable to project-related traffic volumes would occur along multiple roadway segments, where project-related traffic volumes would cause the overall roadway noise level to increase by 0.2 dBA CNEL. The largest roadway noise increase attributable to cumulative traffic volumes (i.e., traffic from the project, related projects, and ambient growth) would be 0.6 dBA, which would also occur along multiple roadway segments. As such, the roadway noise level would not increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category of the City's Noise/Land Use Compatibility Matrix along any roadway segment. Roadway noise impacts during long-term project operations would be considered less than significant, and no mitigation measures would be required.

With regard to roadway noise impacts in terms of hourly L_{eq}, there is no potential for a project, or cumulative project impact along any roadway segment. This is because a doubling of sound energy (i.e., doubling of roadway traffic volumes) is required to achieve a 3-dB noise level

Table IV.H-15

SUNSET AVENUE PROJECT
ROADWAY NOISE IMPACTS AT 50 FEET FROM RIGHT-OF-WAY [a]

Roadway Segment	Existing dBA CNEL	Future No-Project dBA CNEL	Future with Project dBA CNEL	Project Increment [b]	Cumulative Increment [c]
Sunset Avenue, between Main Street and Pacific Avenue	53.6	53.6	53.6	0.0	0.0
Main Street, between Sunset Avenue and Thornton Pl	64.8	65.2	65.4	0.2	0.6
Main Street, between Thornton Place and Abbot Kinney Blvd	65.5	65.8	66.0	0.2	0.5
Abbot Kinney Blvd, between Main Street and Venice Blvd	63.3	63.5	63.7	0.2	0.4
Pacific Avenue, between Sunset Avenue and Windward Avenue	65.9	66.1	66.2	0.1	0.3
Pacific Avenue, between Windward Avenue and Venice Blvd (North)	63.8	64.0	64.1	0.1	0.3
Venice Blvd (North), between Abbot Kinney Blvd and Pacific Avenue	58.2	58.6	58.6	0.0	0.4
Venice Blvd (South) between Abbot Kinney Blvd and Pacific Avenue	59.3	59.7	59.7	0.0	0.4
Pacific Avenue, between Rose Avenue and Sunset Avenue	67.0	67.3	67.3	0.0	0.3
Main Street, between Ocean Park Blvd and Rose Avenue	64.7	65.2	65.3	0.1	0.6
Main Street, between Rose Avenue and Sunset Avenue	64.7	65.2	65.4	0.2	0.7
Nielson Wy/Pacific Avenue, between Ocean Park Blvd and Rose Avenue	67.2	67.5	67.6	0.1	0.4
Rose Avenue, between Main Street and Lincoln Blvd	62.0	62.5	62.7	0.2	0.7

[a] *Exterior CNEL noise levels related to transportation-source noise only.*
[b] *Increase relative to traffic noise levels comparing future pre-Project conditions to future with development of the proposed Project.*
[c] *Increase relative to traffic noise levels comparing existing conditions to future with development of the proposed Project, which includes ambient growth and related project traffic volumes.*

Source: PCR Services Corporation, 2004.

increase, and neither project nor cumulative traffic volumes would cause traffic to double along any roadway segment during any hour. In fact, L_{eq} (1-hour) noise levels would be reduced along many roadway segments, Main Street in particular, due to removal of transit bus trips from the project vicinity, which would be a beneficial effect.

The project proposes to remove the VA Memorial Mural that is currently located on the west boundary of the project site. The mural is an approximately 15-foot-tall solid face surface constructed at the Pacific Avenue right-of-way, which effectively reflects noise from traffic volumes along Pacific Avenue back toward the residential uses that are located on the west side of Pacific Avenue. As such, the removal of this reflective surface may marginally reduce the ambient noise level at some residential properties that are located on the west side of Pacific Avenue, across from the mural, which would be a beneficial effect.

Stationary-Source Noise. The project site would be principally developed with up to 10,000 square feet of commercial uses and 225 multi-family residential units, complete with roof-top deck areas and ground-level courtyard spaces and pedestrian pathways. Parking demand for the project's residential component would be met via a subterranean parking facility, with ingress/egress facilitated by a driveway that would connect to Sunset Avenue. This development would replace the largely above-ground transit bus parking and circulation area that currently exists on the project site. Noise from engine starts, engine revs, bus idling, backup alarm beeps, air compressor machines, and the bus wash operation, would be replaced by noise from residential-use sources such as lawn maintenance activities and congregation areas (e.g., courtyard, pedestrian path, and roof-top deck areas). The swapping of these two noise sources will likely result in reduced ambient noise levels on and immediately surrounding the project site. In terms of community noise exposure and land use compatibility, the proposed residential development, with commercial frontage along Main Street, would be much more compatible with surrounding residential uses than the current industrial use that emanates noise from engine starts, engine revs, bus idling, backup alarm beeps, air compressor machines, and the bus wash operation into the surrounding residential neighborhood. As a result, potential noise impacts that may result due the project's residential component would be less than significant and no mitigation measures would be required.

Commercial activity associated with the project would be confined to the southeast portion of the project site along Main Street, immediately north of Thornton Place. The project's commercial-related noise sources would include truck traffic associated with commercial deliveries and refuse collection, the outdoor dining/seating areas that are oriented towards Main Street, and the subterranean commercial parking facility access point. In addition, a rooftop pool and deck would be located atop the southernmost portion of the mixed-use commercial structure, immediately adjacent to Thornton Place. Since transit bus circulation and refueling activities currently occur at the southeast portion of the project site, no material change in ambient noise levels would be anticipated by swapping the two noise sources. Traffic volumes along Main Street are currently, and would continue to be, the dominant noise source along the southeast portion of the project site. As a result, potential noise impacts that may result due to the project's commercial component would be less than significant and no mitigation measures would be required.

Stationary equipment (parking structure air vents and commercial/residential HVAC equipment) would be confined to the rooftop of the residential and commercial buildings. While these types of equipment are currently used on-site and the proposed equipment is not anticipated to result in a noticeable change in ambient noise levels, noise control measures will be included in the design of the project, as needed, to comply with the provisions of the City of Los Angeles Noise Ordinance (Section 112) for on-site stationary sources. Therefore, operation of mechanical equipment within these areas would not result in increased noise levels. No significant impact would occur and no mitigation measures would be required.

(ii) Ground-Borne Vibration

Future ground-borne vibration in the project vicinity will continue to be generated by vehicular travel on the local roadways. Project operation would not result in any additional long-term ground-borne vibration sources, and therefore would not cause ground-borne vibration levels exceed the 0.2 inch per second PPV significance threshold at any receiver location. As such, impacts would be less than significant and no mitigation measures are required.

(3) Combined Impacts

(a) Construction-Period

There would be no construction activity overlap occurring at the Transportation Facility and Sunset Avenue project site locations. In addition, the project sites are located approximately six miles apart. Noise events that occur at one site location would thus have no effect on the noise environment that surrounds the other site location. As such, impacts would be less than significant.

(b) Operations-Period

The project sites are located approximately six miles apart. Noise events that occur at one site location would thus have no effect on the noise environment that surrounds the other site location. In addition, there is sufficient distance between the two project site locations such that the "areas of potential effect" for roadway noise impacts are mutually exclusive. As such, impacts would be less than significant

3. CUMULATIVE IMPACTS

All of the identified related projects have been considered for the purposes of assessing cumulative noise impacts. The potential for noise impacts to occur are specific to the location of

each related project as well as the cumulative traffic on the surrounding roadway network. Each of the 11 related projects that have been identified within the Transportation Facility site general project vicinity and the 21 related projects that have been identified within the Sunset Avenue site general project vicinity would generate stationary-source and mobile-source noise due to ongoing day-to-day operations. The related projects are of a residential, retail, commercial, and institutional nature and are not typically associated with excessive exterior noise; however, each project would produce traffic volumes that are capable of generating a roadway noise impact.

As discussed previously, traffic volumes from the proposed project and 32 related projects (i.e., 11 related projects in the area surrounding the Transportation Facility site location and 21 related projects in the area surrounding the Sunset Avenue site location), combined with ambient growth traffic, were evaluated and presented previously in Table IV.H-12 on page 310 and Table IV.H-15 on page 318. Cumulative traffic volumes would result in a maximum increase of 0.7 dBA CNEL in areas subject to noise exposure deemed "conditionally unacceptable" or "normally unacceptable," and result in a maximum increase of 3.3 dBA CNEL in areas subject to noise exposure deemed "normally acceptable."

Long-term operation of the Mid-City/Exposition Light Rail Transit (LRT) alignment (which is anticipated to be operational in year 2012) would also add to cumulative noise exposure along Jefferson Boulevard near the Transportation Facility site location. Based on the noise analysis published in the Mid-City/Westside Transit Draft EIS/EIR and using FHWA RD-77-108 calculation procedures to adjust for distance, noise exposure from long-term LRT operation would be approximately 56 dBA CNEL at the closest noise-sensitive location (Syd Kronenthal Park) and 66 dBA CNEL at the industrial uses that are immediately adjacent to the LRT alignment. When added to estimated future cumulative noise levels, this would result in a 1.0 dBA CNEL and 1.7 dBA CNEL increase at the Syd Kronenthal Park and adjacent industrial use locations, respectively. The overall cumulative impact (i.e., noise from project, related projects, and ambient growth traffic volumes, and noise from the LRT alignment) would be 4.3 dBA CNEL and 4.7 dBA CNEL at the Syd Kronenthal Park and adjacent industrial use locations, respectively.[176] Thus, the cumulative noise increase would not exceed the 5 dBA significance threshold and cumulative noise impacts (roadway and LRT) would be less than significant

Due to City of Los Angeles Municipal Code provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project. It is unlikely for on-site noise produced by any related project to be additive to project-related noise levels.

[176] *Refer to Appendix E (Noise) for supporting calculations.*

4. MITIGATION MEASURES

a. West Los Angeles Transportation Facility

Although no significant impacts were identified, the following mitigation measures are prescribed to implement measures requested in the Motion by Supervisor Yvonne B. Burke on Agenda Item No. 26, dated September 25, 2003: (The Motion is included in this Draft EIR as Appendix H-1.)

Mitigation Measure WLA-H.1: The composite noise level emanating from the Transit Facility shall not exceed 84 dBA when measured at a distance of 25 feet from the site perimeter between the hours of 9:00 P.M. and 7:00 A.M. (This measure implements requirements as discussed beginning on page 311 of this Section of the Draft EIR.)

Mitigation Measure WLA-H.2: Employees shall not congregate in the roof-top parking area between the hours of 9:00 P.M. and 7:00 A.M. Signs stating such a message shall be posted conspicuously throughout the roof-top parking deck area. (This measure implements requirements as discussed beginning on page 311 of this Section of the Draft EIR.)

Mitigation Measure WLA-H.3: Employees shall not activate car alarms in the roof-top parking area between the hours of 9:00 P.M. and 7:00 A.M. Signs stating such a message shall be posted conspicuously throughout the roof-top parking facility area. (This measure implements requirements as discussed beginning on page 311 of this Section of the Draft EIR.)

b. Sunset Project

Mitigation Measure Sunset-H.1. Prior to the issuance of any grading, excavation, foundation, or building permits, the Applicant shall ensure that all construction documents require contractors to comply with Los Angeles Municipal Code Section 41.40 which requires all construction and demolition activity located within 500 feet of a residence to occur between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday. (This measure implements LAMC 41.40 requirements as discussed beginning on page 298 of this Section of the Draft EIR.)

Mitigation Measure Sunset-H.2: In the event pile driving is required, pile drivers shall be equipped with noise control having a minimum quieting factor of 10 dBA. (This measure addresses impacts regarding construction noise as discussed beginning on page 313 of this Section of the Draft EIR.)

Mitigation Measure Sunset-H.3: To the extent feasible, loading and staging areas must be located on site and away from noise-sensitive uses surrounding the project site. (This measure addresses impacts regarding construction noise as discussed beginning on page 313 of this Section of the Draft EIR.)

Mitigation Measure Sunset-H.4: Heavy-duty trucks shall utilize a City-approved haul route that avoids noise-sensitive land uses to the maximum extent feasible. (This measure addresses impacts regarding construction noise as discussed beginning on page 313 of this Section of the Draft EIR.)

Mitigation Measure Sunset-H.5: During periods of active construction activity, an eight-foot temporary sound barrier (e.g., wood fence) shall be erected around the site perimeter such that the "line of sight" between construction activity and adjacent residential properties is obstructed. (This measure addresses impacts regarding construction noise as discussed beginning on page 313 of this Section of the Draft EIR.)

Mitigation Measure Sunset-H.6: All pile driving within 75 feet of any off-site adjacent structure shall be conducted with equipment such as sonic pile driver, or similar type of equipment, which generates a level of ground-borne that is less than 0.2-inch per second of peak particle velocity at a reference distance of 50 feet. (This measure addresses impacts regarding construction noise as discussed beginning on page 315 of this Section of the Draft EIR.).

Mitigation Measure Sunset-H.7: All exterior walls, floor-ceiling assemblies (unless within a unit) and windows having a line of sight (30 degrees measured from the horizontal plane) of Pacific Avenue or Main Street shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the UBC Standard No. 35-1, 1982 edition. City of Los Angeles sign-off shall be required prior to obtaining a building permit. The Applicant, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the City of Los Angeles which achieves a maximum interior noise of CNEL 45 (Residential). (This measure addresses potential impacts regarding land use compatibility as discussed beginning on page 317 of this Section of the Draft EIR.)

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. West Los Angeles Transportation Facility

No significant impacts associated with construction or operation of the Transportation Facility were identified.

b. Sunset Project

Mitigation Measures Sunset-H.1 through Sunset-H.5 would reduce noise impacts during construction by 3 to 10 dBA at areas immediately adjacent to the project site. However, noise levels would continue to exceed the 5-dB significance criterion at residential properties that are located immediately north of the project site across Sunset Avenue, east of the project site across Main Street, south of the project site across Thornton Place, and west of the project site across Pacific Avenue.

Mitigation Measure Sunset-H.6, identified above, would reduce potential impacts from ground-borne vibration during construction to a level that is less than significant.

Mitigation Measure Sunset-H.7, identified above, would ensure that interior noise within residential dwelling meet adopted City standards. As such, potential impacts with respect to community noise exposure/land use compatibility would be less than significant.

c. Combined Impacts of Transportation Facility and Sunset Avenue Projects

The project sites are located approximately six miles apart. Noise events that occur at one site location would, thus, have no effect on the noise environment that surrounds the other site location. In addition, there is sufficient distance between the two project site locations such that the "areas of potential effect" for roadway noise impacts are mutually exclusive. As such, during the period of concurrent operations-period activity at the Transportation Facility site location and construction activity at the Sunset Avenue site location, noise impacts to areas surrounding the Transportation Facility site location and situated along the proposed bus route would remain less than significant. During that same time period, noise impacts during construction at areas that surround the Sunset Avenue site location would remain significant, and would not be exacerbated by distant noise events occurring at and around the Transportation Facility site location.

There would be no significant noise impacts attributable to concurrent long-term operations at neither the Transportation Facility nor Sunset Avenue site locations.

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. TRANSPORTATION AND CIRCULATION

The traffic analysis is based on the *Traffic Impact Analysis for a Proposed Bus Maintenance Facility* (July 2004) and *Traffic Impact Analysis for a Mixed-Use Residential & Commercial Development* (July 2004) reports prepared by Overland Traffic Consultants, Inc. (2004) located in Appendix F1 and Appendix F2, respectively, of this Draft EIR.

1. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) West Los Angeles Transportation Facility

The West Los Angeles Transportation Facility site is located on Jefferson Boulevard south of National Boulevard in the City of Los Angeles. Access to the site is primarily provided by the Santa Monica Freeway, Jefferson Boulevard, La Cienega Boulevard and Rodeo Road.

(a) Freeway and Street Characteristics

Santa Monica Freeway (Interstate 10) is located north of the project site. This east/west freeway provides four mixed-flow lanes plus auxiliary lanes between ramp connections in each direction in the vicinity of study area. Freeway access is provided from Washington Boulevard, Fairfax Avenue, Venice Boulevard, and La Cienega Boulevard. Average daily traffic volume on the 10 Freeway at La Cienega Boulevard is approximately 280,000 vehicles per day (ADT). Freeway capacities are typically 2,000 vehicles per hour (VPH) per lane under free flow conditions. Using this capacity value, the 10 Freeway provides a theoretical free flow capacity of approximately 16,000 to 20,000 VPH. Current nondirectional peak-hour traffic volume on the Santa Monica Freeway is 18,000 to 19,000 VPH per Caltrans.

Jefferson Boulevard is a north/south secondary highway providing two lanes in each direction plus a median left-turn lane adjacent to the project site. The roadway is developed to a 60-foot width curb to curb on 70 feet of right-of-way. On-street parking is not permitted on the west side of Jefferson Boulevard. Daily traffic volume on Jefferson Boulevard south of National Boulevard is approximately 17,500 ADT with directional peak-hour flows between 600 to 900 VPH. The current designation of Jefferson Boulevard is a Secondary Highway which may require additional highway dedication (eight feet) and street widening (five feet) to bring it up to

its standard. Except where environmental issues and planning practices warrant alternate standards consistent with capacity requirements, street dedications shall be developed in accordance with standards and criteria contained in the Circulation Element of the General Plan and the City's Standard Street Dimensions. It should be noted that the added dedication and street widening would not provide for any additional traffic lanes or roadway capacity on Jefferson Boulevard.

La Cienega Boulevard is a north/south Class II major highway. Three lanes in each direction plus left-turn lanes are provided. The roadway carries approximately 67,500 vehicles per day with peak-hour flows of 4,400 to 4,800 VPH. The street is constructed with 80 feet of roadway curb to curb on 100 feet of right-of-way. South of Rodeo Road, the right-of-way on La Cienega Boulevard increases to 120 feet in width to provide for a raised median and dual left-turn lanes. On-street parking is not permitted on La Cienega Boulevard.

Rodeo Road/Higuera Street is an east/west Class II major highway between the City limits and Martin Luther King Jr. Boulevard. Three lanes in each direction plus left-turn lanes are provided. The street is constructed with 78 feet curb to curb on 100 feet of right-of-way between Jefferson Boulevard and La Cienega Boulevard.

(b) Existing Traffic Volumes

An analysis of current traffic conditions was conducted for the intersections serving the project site. Figure IV.I-1 on page 327, illustrates the study locations, type of intersection traffic control and lane configurations.[177] Detailed traffic analyses of existing traffic flow were performed at the following three intersections:

- Jefferson Boulevard and National Boulevard
- Jefferson Boulevard and La Cienega Boulevard
- Jefferson Boulevard and Rodeo Road/Higuera Street

Existing traffic volume data were based on actual traffic counts conducted by an independent traffic data collection company. The A.M. and P.M. peak-period counts were conducted manually from 7:00 A.M. to 10:00 A.M. and 4:00 P.M. to 7:00 P.M. in August 2003. All traffic counts were conducted by counting the number of vehicles at each of the three study

[177] *The traffic analysis methodology and selection of intersections was reviewed by LADOT during review of an August 2003 draft of the Traffic Report. LADOT comments have been addressed in the current traffic study.*

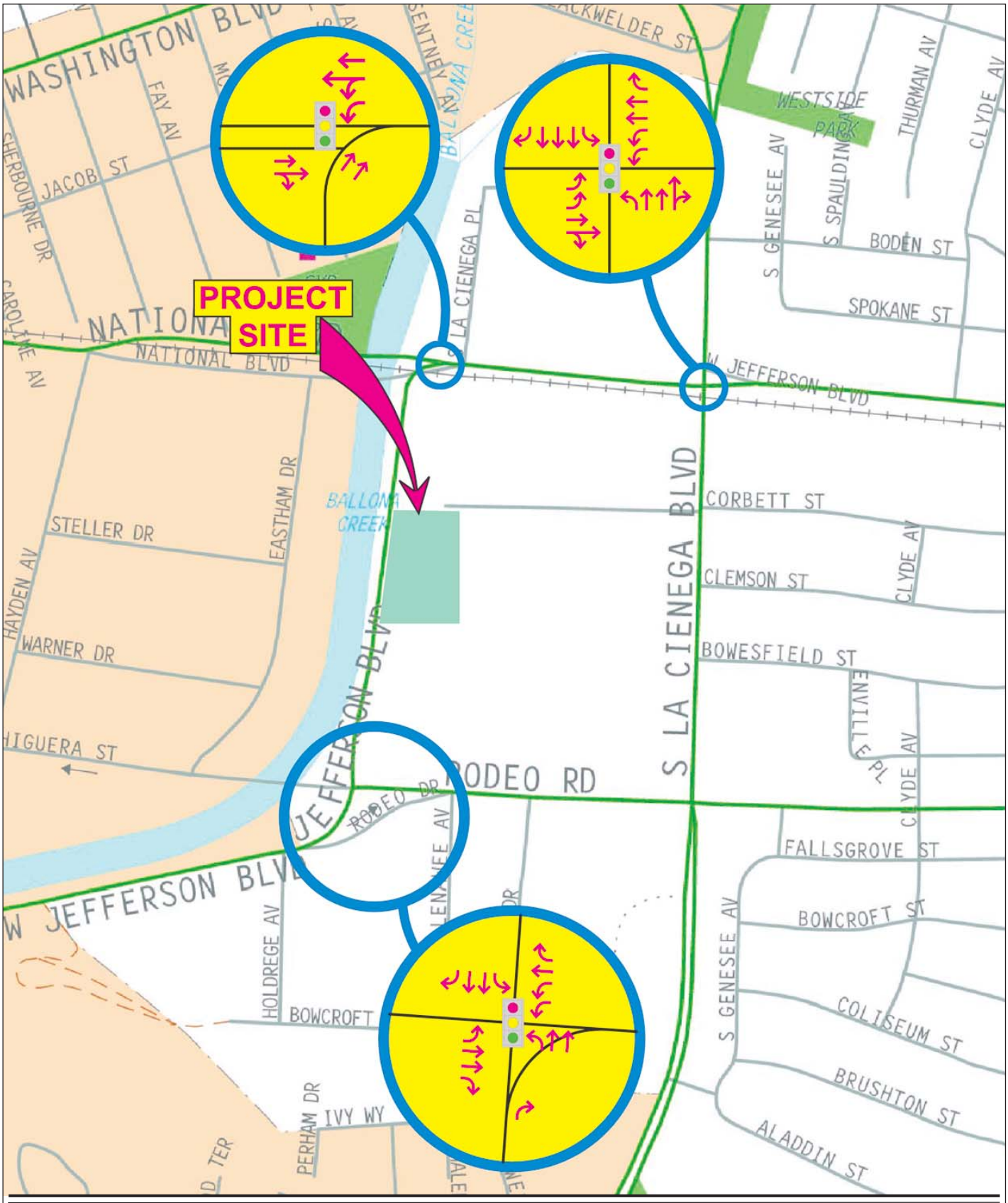

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Figure IV.I-1
West Los Angeles Transportation Facility Study Intersection Characteristics

Source: Overland Traffic Consultants, Inc.

intersections making each movement. The peak-hour volume for each intersection was then determined by finding the four highest consecutive 15-minute volumes for all movements.

(c) Analysis of Existing Conditions

An analysis of existing traffic conditions was performed to determine existing service levels at the study intersections. The traffic conditions analysis was conducted using the Critical Movement Analysis (CMA) method. All study intersections were evaluated using this methodology pursuant to the criteria established by the City of Los Angeles Department of Transportation (LADOT). The peak-hour traffic counts were used along with current intersection geometrics and traffic controls to determine the intersection's operating condition. The highest combinations of conflicting traffic volume (V) at an intersection were divided by the intersection capacity value. Intersection capacity (C) represents the maximum volume of vehicles that have a reasonable expectation of passing through an intersection in one hour under typical traffic flow conditions.

The CMA procedure uses a ratio of the traffic volume to the capacity of an intersection. This volume-to-capacity (V/C) ratio defines the proportion of an hour necessary to accommodate all the traffic moving through the intersection assuming all approaches are operating at full capacity. CMA ratios provide an ideal means for quantifying intersection operating characteristics. For example, if an intersection has a CMA value of 0.70, the intersection is operating at 70 percent capacity with 30 percent of the capacity unused.

Once the volume-to-capacity ratio (i.e., CMA value) was calculated, operating characteristics were assigned a level of service grade (A through F) to estimate the level of congestion and stability of the traffic flow. The term "Level of Service" (LOS) is used by traffic engineers to describe the quality of traffic flow. Definitions of the LOS grades are shown in Table IV.I-1 on page 329. By applying the CMA procedures to the intersection data, the capacity values and the corresponding LOS for existing traffic conditions were determined. The results of the analysis are provided in Table IV.I-2 on page 330. The LOS for Jefferson Boulevard and La Cienega Boulevard is F in both the A.M. and P.M. The LOS for Jefferson and Rodeo Road is E in the A.M. and D in the P.M., whereas the LOS for Jefferson and National Boulevard is A in the A.M. and B in the P.M.

(2) Sunset Avenue Project

The project site is located in the northern area of the Venice Community and occupies the entire block bounded by Sunset Avenue to the north, Pacific Avenue on the west, Thornton Place on the south, and Main Street on the east. The nearest regional transportation facility serving the Sunset Avenue site is the Marina Freeway (State Highway 90) which is located east of Marina del Rey and approximately 1.25 miles east of the project site. This east/west freeway/

Table IV.I-1

LEVEL OF SERVICE DEFINITIONS

Level of Service	Volume/Capacity Ratio	Definition
A	00.00 to 0.60	EXCELLENT: Free flow conditions with low traffic density.
B	0.61 to 0.70	VERY GOOD: A stable flow of traffic
C	0.71 to 0.80	GOOD: Light congestion but stable, occasional backups behind left-turning vehicles.
D	0.81 to 0.90	FAIR: Approaching capacity, drivers are restricted in freely changing lanes. Vehicles may be required to wait more than one light cycle.
E	0.91 to 1.0	POOR: At or near capacity with some long lines for left-turning vehicles. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.
F	>1.00	FAILURE: Jammed conditions with stoppages of long duration

Source: Overland Traffic Consultants, Inc., July 2004.

expressway provides direct access between Lincoln Boulevard and the San Diego Freeway (I-405) and is improved with two to three lanes in each direction. Located approximately 1.5 miles to the north is the Santa Monica Freeway (Interstate 10). A brief description of the primary roadways, which provide access to and from this property, is presented below.

(a) Freeway and Street Characteristics

Main Street is a designated secondary highway. The roadway is constructed to a width of 56 feet curb to curb on 90 feet of right-of-way. Two lanes in each direction are provided on Main Street with on-street metered parking. The standards for a Secondary Highway are a 70-foot roadway and 10-foot sidewalks on each side on 90 feet of right-of-way. However, the roadway centerline is off-set with a 40-foot right-of-way on the west side with a 28-foot half roadway. Therefore, the City could ask for a 2-foot widening along the Main Street frontage of the Sunset Avenue site. Peak-hour traffic is approximately 900 VPH northbound in the morning and southbound in the afternoon.

Sunset Avenue is a one-way westbound local street. However, at the intersection of Main Street and Sunset Avenue, the Metro bus maintenance driveway is situated so that traffic does exit onto Main Street. The roadway is approximately 24 feet in width with parking on the north

Table IV.I-2

WEST LOS ANGELES TRANSPORTATION FACILITY
LEVEL OF SERVICE FOR EXISTING CONDITIONS

		A.M. Peak Hour		P.M. Peak Hour	
No.	**Intersection**	**CMA**	**LOS**	**CMA**	**LOS**
1.	Jefferson Blvd. & La Cienega Blvd.	1.050	F	1.089	F
2.	Jefferson Blvd. & Rodeo Road	0.958	E	0.893	D
3.	Jefferson Blvd. & National Blvd.	0.427	A	0.661	B

Source: Overland Traffic Consultants, Inc., July 2004.

side. A sidewalk of approximately six feet exists on the north side, but no sidewalk exists on the south side of Sunset Avenue.

Pacific Avenue is designated a modified secondary highway. The roadway is constructed to a width of 44 feet curb to curb on 55 feet of right-of-way. Two lanes in each direction are provided on Pacific Avenue between 8 A.M. and 8 P.M. After 8 P.M., street parking is provided until 8 A.M., and only one lane in each direction is provided for traffic flow. Peak-hour traffic is approximately 1,300 VPH northbound in the morning and southbound in the afternoon.

Thornton Place is designated a local street but is unimproved. The roadway functions as a local alley connecting to another alley, Royal Court, and serves the residential block to the south. Thornton Place is not constructed through to Pacific Avenue. The roadway is approximately 16 to 20 feet in width.

(b) Existing Traffic Volumes

The LADOT selected 13 intersections to analyze in the Sunset Avenue Project traffic study. The study intersections include those expected to be most directly impacted by the project.[178] The study intersections are identified by location, type of intersection traffic control, and lane configuration in Figure IV.I-2 and Figure IV.I-3 on pages 331 and 332, respectively.

Detailed traffic analyses of existing conditions were performed at the following 13 intersections:

[178] *LADOT did not identify the intersection of Lincoln Boulevard and California Avenue as a study intersection because of the low estimated volume of project traffic traveling through this intersection. Project traffic on Lincoln Boulevard to and from the north will likely use Rose Avenue to access the project site. Likewise, project traffic on Lincoln Boulevard to and from the south will likely use Venice Boulevard/Abbot Kinney to access the site. Therefore, the small amount of local project traffic on California Avenue at Lincoln Boulevard will not create any significant traffic impacts.*

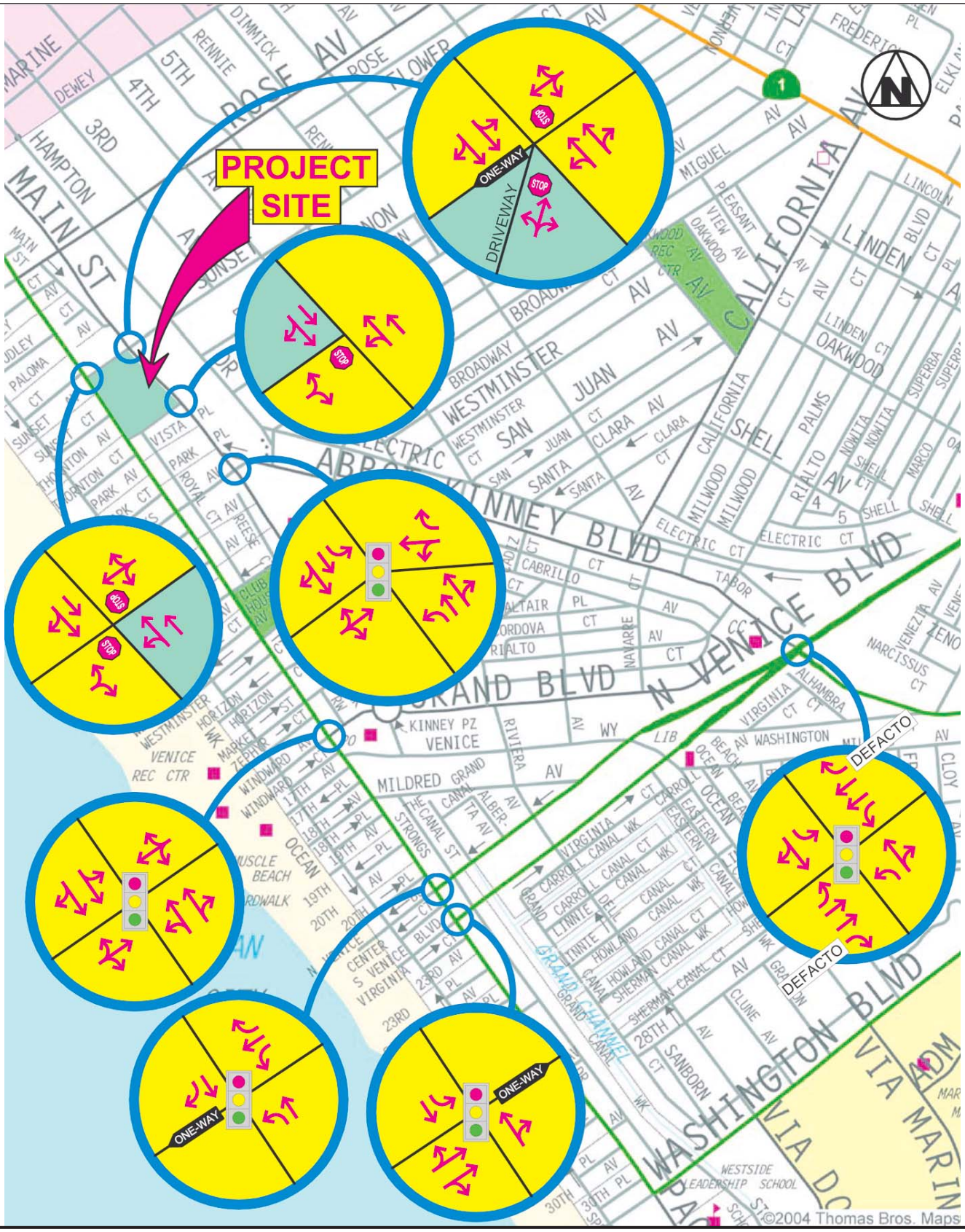

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Figure IV.I-2
Sunset Avenue Project
Study Intersection Characteristics
South of Project Site

Source: Overland Traffic Consultants, Inc.

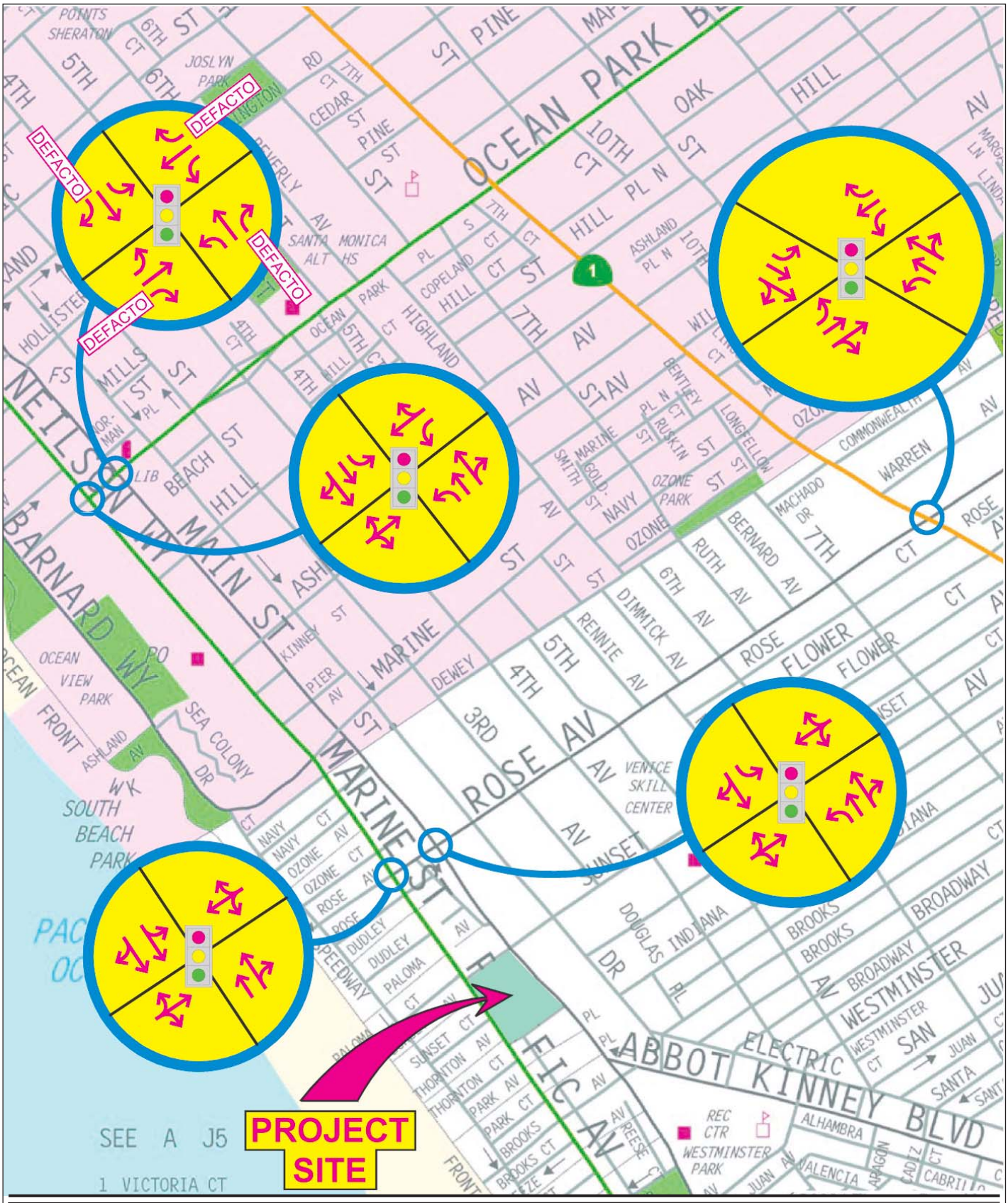

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Figure IV.I-3
Sunset Avenue Project
Study Intersection Characteristics
North of Project Site

Source: Overland Traffic Consultants, Inc.

1. Main Street and Ocean Park Boulevard (City of Santa Monica);
2. Main Street and Rose Boulevard;
3. Main Street and Sunset Avenue;
4. Main Street and Thornton Place;
5. Main Street and Abbot Kinney Boulevard;
6. Abbot Kinney Boulevard and Venice Boulevard;
7. Neilson Way and Ocean Park Boulevard (City of Santa Monica);
8. Pacific Avenue and Rose Avenue;
9. Pacific Avenue and Sunset Avenue;
10. Pacific Avenue and Windward Avenue;
11. Pacific Avenue and Venice Boulevard (N);
12. Pacific Avenue and Venice Boulevard (S); and
13. Rose Avenue and Lincoln Boulevard.

Existing traffic volume data at each of these intersections were also based on traffic counts conducted by an independent traffic data collection company. Traffic counts were conducted by counting the number of vehicles at each of the 13 study intersections making each movement. The peak-hour volume for each intersection was then determined by finding the four highest consecutive 15-minute volumes for all movements.

(c) Analysis of Existing Conditions – Weekdays

As with the West Los Angeles Transportation Facility, the traffic conditions analysis for those intersections located in the City of Los Angeles used the CMA method with the same definitions of the LOS grades as previously summarized in Table IV.I-1 on page 329.

For the two intersections located in the City of Santa Monica, the Highway Capacity Manual (HCM) procedures were used to analyze traffic conditions. New peak-hour traffic counts were used, along with current intersection geometrics and traffic controls, to determine the intersection's typical weekday peak-hour operating condition. Using this procedure, the LOS

is evaluated on the basis of total delay per vehicle (in seconds per vehicle) as shown in Table IV.I-3 on page 335.

With one exception, all study intersections presently operate at LOS C or better during the weekday peak hours, as shown in Table IV.I-4 on page 335. The intersection of Pacific Avenue and Venice Boulevard is currently at LOS D during the weekday P.M. peak hour.

(d) Analysis of Existing Conditions – Summer Weekends

Due to residents' concerns regarding increased traffic during summer weekends, a traffic analysis for the proposed project was also calculated for the project's peak hour on a typical Saturday. Saturday traffic rates were selected for the project weekend analysis because they are slightly higher than traffic rates for a typical Sunday. The existing operating conditions are also shown in Table IV.I-4.

b. Regulatory Framework

(1) West Los Angeles Transportation Facility

The West Adams-Baldwin Hills-Leimert Community Plan sets forth goals and policies related to traffic. The Community Plan states that circulation and accessibility within the Plan Area are relatively easy, because the general north/south, east/west grid pattern. Nonetheless, the Plan specifies that no increase to density shall be allowed by zone change unless the transportation infrastructure serving the project can accommodate the traffic associated therewith.[179]

(2) Sunset Avenue Project

The Venice Community Plan also identifies goals and polices related to traffic. The Community Plan states that major street intersections in the plan area are consistent with the City's objective to maintain a traffic level of service (LOS) of "E."[180] The Coastal Corridor Transportation Specific Plan requires a Transportation Impact Assessment (TIA) Fee for commercial uses to be paid to the Coastal Transportation Corridor Fund for the purposes of funding transportation improvements.[181] The Coastal Corridor Specific Plan also provides

[179] *City of Los Angeles, West Adams-Baldwin Hills-Leimert Community Plan, May 6, 1998, page III-26.*

[180] *City of Los Angeles, Venice Community Plan, September 29, 2000, page III-23.*

[181] *Pursuant to the Coastal Transportation Corridor Specific Plan, Section 2, page 1, residential uses are exempt from the Impact Assessment Fee.*

Table IV.I-3

HIGHWAY CAPACITY MANUAL DEFINITIONS

LOS	Control Delay per Vehicle (s/veh)
A	≤10
B	> 10 – 20
C	> 20 – 35
D	> 35 – 55
E	> 55 – 80
F	> 80

Source: Overland Traffic Consultants, Inc., July 2004.

Table IV.I-4

SUNSET AVENUE PROJECT
LEVEL OF SERVICE FOR EXISTING CONDITIONS

		Weekday A.M. Peak Hour		Weekday P.M. Peak Hour		Saturday Peak Hour	
No.	**Intersection**	**V/C**	**LOS**	**V/C**	**LOS**	**V/C**	**LOS**
2.	Main Street & Rose Ave.	0.441	A	0.688	B	0.591	A
3.	Main Street & Sunset Ave.	0.450	A	0.436	A	0.374	A
4.	Main Street & Thornton Pl.	0.348	A	0.394	A	0.299	A
5.	Main Street & Abbot Kinney Blvd.	0.482	A	0.395	A	0.507	A
6.	Abbot Kinney Blvd. & Venice Blvd.	0.510	A	0.625	B	0.709	C
8.	Pacific Ave. & Rose Ave.	0.506	A	0.510	A	0.514	A
9.	Pacific Ave. & Sunset Ave.	0.546	A	0.572	A	0.421	A
10.	Pacific Ave. & Windward Ave.	0.361	A	0.472	A	0.467	A
11.	Pacific Ave. & Venice Blvd. (N)	0.552	A	0.803	D	0.766	C
12.	Pacific Ave. & Venice Blvd. (S)	0.736	C	0.730	C	0.731	C
13.	Rose Ave. & Lincoln Blvd.	0.784	C	0.763	C	0.850	D
	Santa Monica Intersections	**Delay (sec.)**	**LOS**	**Delay (sec.)**	**LOS**	**Delay (sec.)**	**LOS**
1.	Main Street & Ocean Park Blvd.	14.1	B	14.1	B	12.7	B
7.	Neilson Way & Ocean Park Blvd.	7.3	A	9.4	A	9.6	A

Source: Overland Traffic Consultants, Inc., July 2004.

requirements for mitigation measures and trip generation data to be used for projects located within the Specific Plan area.[182]

2. ENVIRONMENTAL IMPACTS

a. Methodology

Impacts on traffic from construction activities were evaluated by describing the construction programs at the two project sites and identifying potential conflicts between site activities and traffic in the project vicinity.

Traffic impacts from project operations were determined based on the following steps: (1) analyze future traffic conditions (existing conditions plus growth); (2) determine trip generation based on the project components; (3) assign these new trips to local roadways; and (4) apply a Critical Movement Analysis to evaluate the service condition with the addition of other projects. The future conditions with the project were compared to future conditions without the project to indicate the change in service levels caused by the project. These changes were compared to the thresholds of significance to determine if they were significant. Given the varying components of each project, site-specific methodologies, as described below, were applied.

b. Thresholds of Significance

(1) Construction

Neither the Los Angeles Department of Transportation nor the L.A. *CEQA Thresholds Guide* has established a significance threshold for traffic impacts resulting from construction activity. For purposes of this analysis, a short-term significant impact on traffic due to construction is conservatively identified if:

- Haul trucks and staging activities associated with excavation would cause substantial inconvenience to travelers, residents, and commercial interests in the project area for a period of at least several months;
- The trips generated due to construction activities would exceed the thresholds established for project operations, as may be adjusted by LADOT to account for the

[182] *City of Los Angeles, Coastal Transportation Corridor Specific Plan, September 22, 1993.*

relative short-term nature of construction activities as compared to the long-term impacts associated with indefinite project operations.

(2) Intersection Capacity

The City of Los Angeles, "L.A. CEQA Thresholds Guide" (1998, p. F.1-3) incorporates significance thresholds developed by the Department of Transportation and states:

- A proposed project would normally have a significant impact on intersection capacity if the project traffic causes an increase in the V/C ratio on the intersection operating condition after the addition of project traffic of one of the following:
  - V/C ratio increase ≥ 0.040 if final LOS* is C[183]
  - V/C ratio increase ≥ 0.020 if final LOS* is D
  - V/C ratio increase ≥ 0.010 if final LOS* is E or F

  * Final LOS is defined as projected future conditions including project, ambient, and related growth but without project traffic mitigation.

Therefore, these thresholds will be used to determine whether project intersection impacts at intersections located in the City of Los Angeles would be significant.

For the two intersections located in the City of Santa Monica analyzed for the Sunset Avenue Project, the threshold of significance is based on the amount of change in average vehicular delay incurred by vehicles through the intersection (as opposed to the change in the V/C ratio used by the City of Los Angeles) to quantify the level of service of an intersection. The City of Santa Monica evaluates the traffic impact based on the increase in average vehicle delay using the Highway Capacity Manual operational analysis methodology. The significance criterion for arterial intersection impacts employed by the City of Santa Monica is summarized in Table IV.I-5 on page 338.

(3) Bus Routing Impacts (Transportation Facility)

Neither the Los Angeles Department of Transportation nor the L.A. *CEQA Thresholds Guide* has established a significance threshold for traffic impacts resulting from bus routing and

[183] *While so stated in the Thresholds Guide, this significance ratio applies for intersection capacity of C or better, i.e. LOS A, B or C.*

Table IV.I-5

SUNSET AVENUE PROJECT
CITY OF SANTA MONICA SIGNIFICANT TRAFFIC IMPACT CRITERION

Future Base Scenario	Future Plus Project Scenario
If LOS = A, B, or C and is an arterial intersection	Significant Impact if: Average vehicle delay is ≥ 15 seconds or LOS becomes D, E, or F
If LOS = D and is an arterial intersection	Significant Impact if: Average vehicle delay is ≥ 15 seconds or LOS becomes E or F
If LOS = E and is an arterial intersection	Significant Impact if: Any net increase in average seconds of delay per vehicle
If LOS = F and is an arterial intersection	Significant Impact if: HCM V/C ratio net increase is ≥ 0.005

Source: Overland Traffic Consultants, Inc., July 2004.

bus operations in regard to intersection configurations. For purposes of this analysis, a short-term significant impact on traffic due to bus routing is conservatively identified if:

- Bus operations at a studied intersection would encroach into adjacent traffic in a manner that could substantially interfere with traffic flow.

c. Analysis of Project Impacts

(1) West Los Angeles Transportation Facility

(a) Construction Impacts

Construction of the Transportation Facility would require environmental clean up, demolition, grading, and construction of the new facility. Construction equipment, crew vehicles, haul trucks and vehicles delivering building materials would generate traffic during construction activities. The number of construction workers and construction equipment would vary throughout the construction process in order to maintain a reasonable schedule of completion. In general, construction hours and days are planned to occur from 7 A.M. to 3 P.M., Monday through Friday with occasional overtime hours and some weekends. Since construction workers' trips would occur outside of the morning and afternoon peak hours, construction impacts from this particular type of traffic activity would be less than significant.

The site preparation work is estimated to take approximately one month, with site grading/excavation lasting an additional month in duration. The construction of the bus facility would take approximately 12 months to complete.

The amount of export/import at the site is estimated at less than 20,000 cubic yards. During the early stages of the grading operation it is estimated that moving this amount would generate up to approximately 50 truckloads per day, or 100 directional daily trips. Assuming each haul truck would have a capacity of 12 cubic yards, grading would occur for 33 working days, or 1.5 months.[184] This level of truck activity would generate approximately six peak-hour truckloads, an equivalent of 12 truck trips during each hour of an eight-hour work day, or 96 daily truck trips. Based on current plans, the haul route identified for the site excavation and soil movement would direct traffic to travel north and east on Jefferson Boulevard, north on La Cienega Boulevard to the I-10 Interstate Freeway. Return trips will travel the same route. No detours around the construction site are expected, however, flagmen would be used to control traffic movement during the ingress and egress of trucks and heavy equipment.

Excavation activity at the project site would be limited. Further, site conditions, including site accessibility and the nature of surrounding uses, do not pose unusual or difficult conditions for removing excavated materials from the project site. Therefore, construction impacts would be less than significant. Nonetheless, Work Area Traffic Control Plans are typically advised in construction projects to minimize non-significant adverse impacts and to assure that significant impacts do not occur. Therefore, mitigation measures are proposed for construction activities.

As indicated above, truck traffic during construction would be light (12 trips during each peak hour). Further, the construction workers would normally arrive at the project site and depart during non-peak hours, and therefore would not add substantially to the truck trips occurring during the peak hours. Total trip generation and related impacts would be considerably less than the impacts that would occur during project operations. Impacts from construction vehicle traffic would be less than significant.

(b) Operational Impacts

Analysis of Future Traffic Conditions. Future traffic volume projections were developed to analyze the traffic conditions after completion of other planned land developments including the proposed project. Pursuant to the City of Los Angeles traffic impact guidelines, the following steps were taken to develop the future traffic volume estimate:

a. Existing traffic plus ambient growth (4 percent) to 2006 study year;

b. Traffic in (a) plus related projects (without project scenario);

[184] *Based on 22 work days in a month.*

c. Traffic in (b) with the proposed project traffic (with project scenario);

d. Traffic in (c) plus the proposed traffic mitigation, if necessary.

The future cumulative analysis included other development projects located within the study area that are either under construction or planned. As part of this analysis, a development list was obtained from the LADOT and the City of Culver City. These projects were checked in the field to identify those projects that could produce additional traffic at the study intersection for the study year 2006. The eleven related projects identified for the cumulative analysis of the Transportation Facility are provided in Section III, Environmental Setting, of this Draft EIR. Estimates of the peak-hour trips generated by the other developments were calculated by applying ITE trip-generation rates to evaluate future traffic conditions with the related projects. The potential traffic impact of traffic growth was calculated by adding the existing traffic volume, an ambient growth factor (an average of CMP and DOT growth rates resulting in a 1.04 growth rate), and traffic from the related projects. A comparison of the conditions including the columns labeled "Existing," "Future Without Project," and "Future with Project (PCE Adjusted)" are provided in Table IV.I-6 on page 341.

Trip Generation. A trip-generation analysis was performed to determine the number of trips created by the proposed project. The database normally used to estimate traffic generation of a new land use is the ITE *Trip Generation Handbook*. Traffic-generating characteristics of the proposed bus maintenance facility, however, have not been surveyed by the Institute of Transportation Engineers (ITE). Therefore, site specific traffic generation studies were conducted at a similar Metro bus maintenance facility and used as the basis for the traffic estimates of the proposed Jefferson Boulevard facility. The traffic generation surveys were conducted at the Division 10 bus maintenance facility located at 742 North Mission Road in the City of Los Angeles. Traffic data was collected for three days between the hours of 4 A.M. and 9 P.M. Directional employee trips and bus trips to and from the site were counted to determine the hourly traffic characteristics by trip type. The Division 10 survey data was then adjusted based on the number of buses serviced at the Division 10 facility and that proposed at the new West Los Angeles Transportation Facility (adjustment factor 175/271).

The traffic volume assessment for the proposed project used an adjustment factor to account for the effect of buses, or heavy vehicles, on the capacity of the streets and intersections. Heavy vehicles are those with more than four tires touching pavement. Adjustments for heavy vehicles are necessary to account for the additional space occupied by these vehicles and for the difference in operating capabilities compared to passenger cars. To account for these effects, each bus is converted to an equivalent number of passenger cars (PCE). The recommended

Table IV.I-6

WEST LOS ANGELES TRANSPORTATION FACILITY
INTERSECTION OPERATING CONDITIONS

No.	Intersection	Peak Hour	Existing		Future Without Project			Future with Project (PCE Adjusted)			
			CMA	LOS	CMA	LOS	Growth	CMA	LOS	Impact	Significant?
1.	Jefferson Blvd. &	A.M.	1.050	F	1.143	F	+0.093	1.151	F	+0.008	No
	La Cienega	P.M.	1.089	F	1.170	F	+0.081	1.170	F	+0.000	No
2.	Jefferson Blvd &	A.M.	0.958	E	1.070	F	+0.112	1.072	F	+0.002	No
	Rodeo Rd.	P.M.	0.893	D	0.970	E	+0.077	0.977	E	+0.007	No
3.	Jefferson Blvd. &	A.M.	0.427	A	0.523	A	+0.096	0.535	A	+0.012	No
	National Blvd.	P.M.	0.661	B	0.743	C	+0.082	0.747	C	+0.004	No

[a] *The impact analysis does not consider any changes to the existing intersection configuration (i.e., future roadway improvements).*

Source: Overland Traffic Consultants, Inc., July 2004.

average PCE value for converting heavy vehicles is 2.0.[185] Therefore, the estimated traffic volume generated by buses was adjusted by the PCE value for the intersection traffic impact assessment.

It is estimated that the project would generate an average of 1,247 vehicle trips per day with 79 morning trips and 67 afternoon trips at the project driveways as shown in Table IV.I-7 on page 343. As stated above, adjustments for heavy vehicles are necessary to account for the additional space occupied by these vehicles and for the difference in operating capabilities compared to passenger cars. To account for these effects, each bus (i.e., heavy vehicle) is converted to an equivalent number of passenger cars (PCE). With the PCE, the project would generate an average of 1,666 vehicle trips per day with 107 morning trips and 103 afternoon trips at the project driveways. Figure IV.I-4 on page 344 depicts the total traffic volume with the bus volume multiplied by the PCE factor of 2.

Trip Distribution. The proposed route for the bus traffic was provided by Metro. Using the traffic volumes shown in Table IV.I-7, trip assignments to the study intersections were developed separately for the employee and bus (PCE) trip types. The estimated assignment of project traffic provides the necessary level of detail to analyze the potential peak-hour traffic impacts generated by the project at the study locations. The trip distribution for the study intersections includes the following: 76 morning peak-hour trips and 85 afternoon peak-hour trips at Jefferson Boulevard and La Cienega; 29 morning peak-hour trips and 18 afternoon peak-hour trips at Jefferson Boulevard and Rodeo Road; and 78 morning peak-hour trips and 86 afternoon peak-hour trips at Jefferson Boulevard and National.

Critical Movement Analysis. Comparing the changes in the traffic conditions between the different traffic growth scenarios provides the necessary information to determine if project traffic increases create a significant impact on the respective study intersections. Existing operating conditions, the future without project, and the future with the proposed project are all analyzed in Table IV.I-6 on page 341. None of the study intersections are impacted by project traffic volume using the significant impact criteria established by the LADOT. Since none of the project impacts exceed the significance thresholds, less-than-significant traffic impacts would occur.

(c) Routing Impacts

The analysis of operations at the studied intersections identified a potential project impact with regard to the routing of buses through the intersection of Jefferson Boulevard and La Cienega Boulevard, due to the physical roadway constraints at this intersection. Inbound

[185] *Highway Capacity Manual, Transportation Research Board, 2000 Edition.*

Table IV.I-7

WEST LOS ANGELES TRANSPORTATION FACILITY
ESTIMATED PROJECT TRAFFIC GENERATION

		A.M. Peak Hour			P.M. Peak Hour		
Trip Type	**Daily Traffic**	**Total**	**In**	**Out**	**Total**	**In**	**Out**
Employee Trips	828	51	23	28	31	9	22
Bus Trips	419	28	22	6	36	34	2
Bus PCE Trips	838	56	44	12	72	68	4
Total Non-Adjusted Trips	1,247	79	45	34	67	43	24
Total PCE Adjusted Trips	1,666	107	67	40	103	77	26

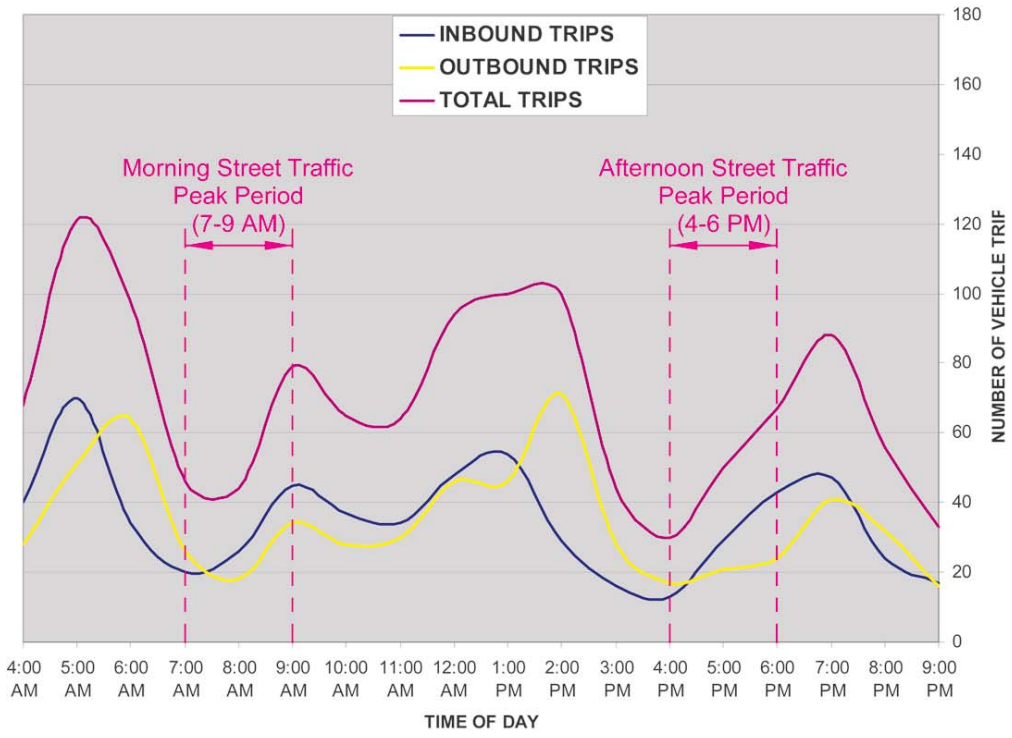
Source: Overland Traffic Consultants, Inc., July 2004.

buses traveling southbound on La Cienega Boulevard would have a difficult right-turn maneuver to westbound Jefferson Boulevard. The travel path of the southbound bus would need to encroach into the adjacent through lane to negotiate this southbound right turn.

Test runs have been made by the MTA, and it has been determined that buses can negotiate the turn, but it is tight. At peak times this intersection is congested and a right-turning bus could encroach into adjacent traffic. In addition, longer articulated buses will also be using the maintenance facility and traveling on the routes to and from the site. Such potential encroachment is conservatively estimated to pose a potential for substantially affecting traffic flow at the intersection. This impact is considered significant, prior to mitigation. A mitigation measure is proposed below to reduce such impacts to less than significant.

The analysis of impacts at the intersection of Jefferson Boulevard and La Cienega also identified potential encroachment into traffic from eastbound buses queuing on Jefferson Boulevard to turn northbound onto La Cienega Boulevard. Due to the large volume of vehicles currently turning left from Jefferson Boulevard to La Cienega Boulevard, the left-turn vehicle queue may at time exceed the left-turn storage capacity provided at the intersection, which is approximately 600 feet of storage. However, the eastbound left-turn storage area can be increased to accommodate the added project traffic as part of the Jefferson Boulevard intersection modifications discussed. The proposed street widening on Jefferson Boulevard would allow for the implementation of longer eastbound left-turn lanes, pursuant to the mitigation measures below, that would avoid a substantial interference with traffic flow, and fully mitigate these potential queuing impacts from added project traffic.

Total Trip Generation not adjusted for bus traffic



Total Trip Generation adjusted for bus traffic

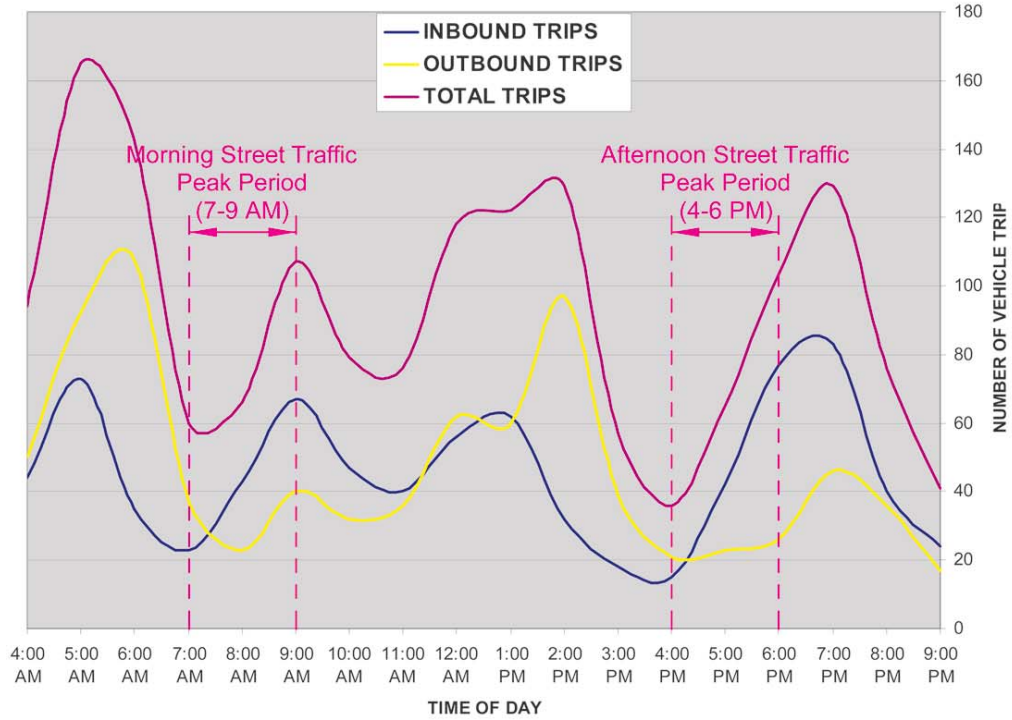


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Figure IV.I-4
West Los Angeles Transportation Facility
Hourly Trend Line of Total Project Traffic Flow
(With & Without PCE Adjustment)

Source: Overland Traffic Consultants, Inc.

(2) Sunset Avenue Project

(a) Construction Impacts

As with the Transportation Facility, construction equipment, crew vehicles, haul trucks and vehicles delivering building materials would generate traffic during construction activities. The number of construction workers and construction equipment would vary throughout the construction process in order to maintain a reasonable schedule. Construction hours and days are planned to occur from 7 A.M. to 3 P.M., Monday through Friday, with overtime hours and some weekends. Since construction workers' trips to and from this site would also occur outside of the morning and afternoon peak hours, construction impacts from this particular type of traffic activity would be less than significant. No detours around the construction site are expected, however, flagmen would be used to control traffic movement during the ingress and egress of trucks and heavy equipment.

Construction of the Sunset Avenue Project is estimated to take approximately 24 months. The site preparation work is estimated to take approximately 2 months, with site grading/ excavation lasting 3 months in duration. The construction of the parking garage would take approximately 4 months to complete. The construction of the residential and commercial uses would take approximately 15 months to complete.

The amount of export material at the project site is estimated at 125,000 cubic yards. During the early stages of the grading operation it is estimated that moving this amount of material will generate up to approximately 100 truckloads per day, or 200 directional daily trips. This level of truck activity would generate approximately 13 peak-hour truckloads an equivalent of 26 truck trips during each hour of an eight-hour work day. Assuming each truck would have a capacity of 12 cubic yards, this operation would occur for 104 days, or approximately five months.[186] The haul route for the site excavation and soil movement would direct traffic to travel north on Main Street, east on Rose Avenue and south on Lincoln Boulevard to the Marina Freeway. Return trips would travel the same route.

During excavation, conflicts between truck-haul activities and street traffic and pedestrian travel could occur, due to site constraints related to the project's location, with nearby neighborhoods and certain roadway limitations. Because potential conflicts would occur for an estimated 100 truckloads (200 trips) per day and related conflicts would occur over a period estimated at three to five months, a substantial inconvenience may occur for travelers, residents, and commercial uses in the area unless measures are taken to control such activity. Therefore, the project's construction impacts on traffic due to excavation on traffic are considered a

[186] *Assuming 22 work days per month.*

potentially significant short-term impact, prior to mitigation. Mitigation measures are proposed to reduce the potential impact to less-than-significant levels.

As indicated above, truck traffic during construction would be limited to approximately 26 trips during each peak hour. Further, the construction workers would normally arrive at the project site and depart during non-peak hours and, therefore, would not add substantially to the truck trips occurring during the peak hours. Total trip generation and related impacts would be considerably less than the impacts that would occur during project operations. Impacts from construction vehicle traffic would be less than significant.

(b) Operational Impacts

Analysis of Future Traffic Conditions – Weekdays. Similar to the West Los Angeles Transportation Facility, future traffic volumes were developed based on the City of Los Angeles traffic impact guidelines. In addition, the future cumulative analysis included development lists obtained from the LADOT and the City of Santa Monica Planning Department website. The lists of related projects used for the future traffic conditions are shown in Table III-2 in Section III, Environmental Setting, of this Draft EIR.

Trip Generation. Traffic-generating characteristics of residential and non-residential land uses are continually studied by the Institute of Transportation Engineers (ITE). The most recent results of their traffic-generation studies have been published in *Trip Generation*, 6th Edition.[187] This publication of traffic-generation data has become the industry standard for estimating traffic generation for different land uses. The Coastal Corridor Specific Plan also provides trip-generation data to be used for projects located within the Specific Plan area. This analysis utilizes both the ITE and Coastal Transportation Corridor Specific Plan trip-generation rates for estimating the traffic generated by the existing and proposed development on the project site.

These trip-generation studies indicate that the uses associated with the proposed project generally exhibit the trip-making characteristics per 1,000 square feet of floor area for non-residential uses and per dwelling unit for residential uses.[188] On the basis of these traffic-generation rates, estimates of the project's driveway traffic were calculated. The proposed project would generate an average of 2,326 vehicle trips per weekday with 185 morning peak-hour trips and 203 afternoon peak-hour trips as shown in Table IV.I-8 on page 347.

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[187] *Institute of Transportation Engineers, Trip Generation, 6th Edition, 1997.*

[188] *Project trip generation rates are provided in the Traffic Impact Study for the Sunset Site Project, Overland Traffic Consultants, Inc., July 2004, page 11, which is included in Appendix F2 of this EIR.*

Table IV.I-8

SUNSET AVENUE PROJECT
ESTIMATED PROJECT TRAFFIC GENERATION – WEEKDAYS

Proposed Land Use	Daily Traffic	A.M. Peak Hour			P.M. Peak Hour		
		Total	In	Out	Total	In	Out
225 Units	1,319	99	16	83	158	106	52
2,000 s.f. retail	81	2	1	1	10	4	6
1,000 s.f. coffee shop	716	44	26	18	10	5	5
7,000 s.f. spa	210	40	24	16	25	15	10
Driveway Traffic	**2,326**	**185**	**67**	**118**	**203**	**130**	**73**
Less Pass-By							
Retail (10 percent)	- 8	—	—	—	- 1	—	- 1
Coffee Shop (50 percent)	-358	- 22	-13	- 9	- 5	- 3	- 2
Health Club (20 percent)	-42	- 8	- 5	- 3	- 5	- 3	- 2
With Pass-By	**1,918**	**155**	**49**	**106**	**192**	**124**	**68**
Less Metro Bus Facility	750 est.	48	15	33	18	11	7
Net New Traffic	**1,168**	**107**	**34**	**73**	**174**	**113**	**61**

This is a conservative analysis that is no longer part of the project; therefore, the trip generation is overstated.

Source: Overland Traffic Consultants, Inc., July 2004.

For traffic impact purposes, project traffic generation has been reduced, according to LADOT guidelines, to account for the removal of trip making associated with the existing use and for pass-by traffic. A pass-by trip is a trip that is already on local streets and takes advantage of a new commercial establishment. This circumstance does not generate a new trip added to the street by the new commercial use and, therefore, is not considered as part of the project traffic impact. After these traffic adjustments, it has been estimated that the net new traffic added to the local streets by the Sunset Avenue Project is 1,168 daily trips with 107 morning trips and 174 afternoon trips, as shown in Table IV.I-8.

With regard to Saturday operations, the proposed project generates slightly less weekend peak traffic than the weekday afternoon peak hour. As indicated in Table IV.I-9 on page 348, the project would be expected to generate an average of 169 peak-hour Saturday trips, as compared to the estimated weekday 185 A.M. peak-hour trips and 203 P.M. peak-hour trips during the week. With reductions to the project traffic generation to account for the removal of the existing use and for pass-by traffic, according to LADOT guidelines, the net traffic added to the streets on a Saturday peak hour would be 147 trips. This number of trips is greater than the 107 A.M. peak-hour trips, but 27 trips less than the 174 trips during the weekday P.M. peak hour, which is the time when project impacts have the greatest effect.

Table IV.I-9

SUNSET AVENUE PROJECT
ESTIMATED PROJECT TRAFFIC GENERATION – SATURDAYS

		Saturday Peak Hour		
Proposed Land Use	**Saturday Traffic**	**Total**	**In**	**Out**
225 Units	1,276	106	56	50
2,000 s.f. retail	84	8	4	4
1,000 s.f. coffee shop	696	37	16	21
7,000 s.f. foot spa	146	18	11	7
Driveway Traffic	**2,202**	**169**	**87**	**82**
Less Pass-By				
Retail (10 percent)	-8	—	—	—
Coffee Shop (50 percent)	-348	-18	-8	-10
Health Club (20 percent)	-29	-4	-2	-2
With Pass-By	**1,817**	**147**	**77**	**70**
Less Metro Bus Facility	-400 (est.)	(gates closed)	(gates closed)	(gates closed)
Net New Traffic	**1,417**	**147**	**77**	**70**

Source: Overland Traffic Consultants, Inc., July 2004

Trip Distribution. A primary factor affecting trip direction is the spatial distribution of population and employment centers which produce trip origins and destinations. The estimated project directional traffic distribution is also based on the study area roadway network, existing traffic flow and site access. The LADOT approved the traffic distribution percentages for the project site as illustrated in Figure IV.I-5 on page 349. The assignment of project traffic to the study intersections was calculated by multiplying the traffic estimates by intersection percentages for each project component. This assignment of project traffic at each intersection provides the level of detail necessary to analyze potential traffic impacts at each study location.[189]

Critical Movement Analysis. Traffic conditions after completion of the project were calculated by adding the project volume for each access scenario to the traffic volume estimates without the project. Comparing the changes in the traffic conditions between the future without project and future with project scenarios, identified in Table IV.I-10 on page 350, provides the necessary information to determine if the project creates a significant impact on the study intersections during the weekday A.M. and P.M. peak hours.

As shown in Table IV.I-10 on page 350, on weekdays the project would significantly impact two intersections located in the City of Los Angeles. Those intersections are:

[189] *The variations in traffic distribution that would occur under the weekend conditions analyzed are presented in Appendix D of the Traffic Report, Appendix F2 of this EIR.*

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Not To Scale

Source: Overland Traffic Consultants, Inc.

Figure IV.I-5
Sunset Avenue Project
Project Traffic Distribution

Table IV.I-10

SUNSET AVENUE PROJECT (WEEKDAY)
INTERSECTION OPERATING CONDITIONS

No.	Intersection	Peak Hour	Existing		Future Without Project		Future with Project			Future with Project + Mitigation		
			V/C	LOS	V/C	LOS	V/C	LOS	Impact	V/C	Impact	LOS
2.	Main Street &	A.M.	0.441	A	0.493	A	0.508	A	+0.015	0.477	-0.016	A
	Rose Ave.	P.M.	0.688	B	0.767	C	0.807	D	+0.040*	0.773	+0.006	C
3.	Main Street &	A.M.	0.450	A	0.495	A	0.524	A	+0.029	0.501	+0.006	A
	Sunset Ave.	P.M.	0.436	A	0.477	A	0.573	A	+0.096*	0.514	+0.037	A
4.	Main Street &	A.M.	0.348	A	0.372	A	0.374	A	+0.002	N/A	N/A	N/A
	Thornton Place	P.M.	0.394	A	0.427	A	0.440	A	+0.013	N/A	N/A	N/A
5.	Main Street &	A.M.	0.482	A	0.529	A	0.549	A	+0.020	N/A	N/A	N/A
	Abbot Kinney Blvd.	P.M.	0.395	A	0.425	A	0.438	A	+0.013	N/A	N/A	N/A
6.	Abbot Kinney Blvd. &	A.M.	0.510	A	0.541	A	0.547	A	+0.006	N/A	N/A	N/A
	Venice Blvd.	P.M.	0.625	B	0.662	B	0.666	B	+0.004	N/A	N/A	N/A
8.	Pacific Ave. &	A.M.	0.506	A	0.548	A	0.558	A	+0.010	N/A	N/A	N/A
	Rose Ave.	P.M.	0.510	A	0.555	A	0.559	A	+0.004	N/A	N/A	N/A
9.	Pacific Ave. &	A.M.	0.546	A	0.582	A	0.588	A	+0.006	N/A	N/A	N/A
	Sunset Ave.	P.M.	0.572	A	0.611	B	0.616	B	+0.005	N/A	N/A	N/A
10.	Pacific Ave. &	A.M.	0.361	A	0.384	A	0.385	A	+0.001	N/A	N/A	N/A
	Windward Ave.	P.M.	0.472	A	0.501	A	0.502	A	+0.001	N/A	N/A	N/A
11.	Pacific Ave. &	A.M.	0.552	A	0.599	A	0.601	B	+0.002	N/A	N/A	N/A
	Venice Blvd. (N)	P.M.	0.803	D	0.867	D	0.870	D	+0.003	N/A	N/A	N/A
12.	Pacific Ave. &	A.M.	0.736	C	0.797	C	0.799	C	+0.002	N/A	N/A	N/A
	Venice Blvd. (S)	P.M.	0.730	C	0.791	C	0.794	C	+0.003	N/A	N/A	N/A
13.	Rose Ave. &	A.M.	0.784	C	0.890	D	0.894	D	+0.004	N/A	N/A	N/A
	Lincoln Blvd.	P.M.	0.763	C	0.893	D	0.891	D	+0.018	N/A	N/A	N/A
Santa Monica Delay Procedures			**Delay**	**LOS**	**Delay**	**LOS**	**Delay**	**LOS**	**Impact**	**Delay**	**Impact**	**Impact**
1.	Main Street &	A.M.	14.1	B	16.9	B	17.5	B	+0.6	N/A	N/A	N/A
	Ocean Park Blvd.	P.M.	14.1	B	16.7	B	18.2	B	+1.5	N/A	N/A	N/A
7.	Neilson Way &	A.M.	7.3	A	7.7	A	7.8	A	+0.1	N/A	N/A	N/A
	Ocean Park Blvd.	P.M.	9.4	A	10.0	B	10.1	B	+0.1	N/A	N/A	N/A

**Denotes a significant impact.* *N/A = Not Applicable*

Source: Overland Traffic Consultants, Inc., July 2004.

- Main Street and Rose Avenue (P.M. only); and
- Main Street and Sunset Avenue (P.M. only).

Analysis of Future Conditions – Summer Weekends

As indicated above, due to residents' concerns regarding increased traffic during summer weekends, the impact analysis was also performed for a Saturday peak hour. The results are presented in Table IV.I-11 on page 352. The proposed project would significantly impact one intersection in the City of Los Angeles. That intersection is Rose Avenue and Lincoln Boulevard.

Vehicular access to the site for the residents is via a driveway located on Sunset Avenue approximately 100 feet west of Main Street. This driveway will provide an entrance and exit to Main Street and an exit to Pacific Avenue. Traffic flow will remain one-way westbound to Pacific Avenue west of the proposed Sunset Avenue residential driveway. A second entrance/exit for the non-residential traffic (commercial and visitors) will be provided on Main Street located approximately mid-block. The Main Street access will be a right-turn ingress/egress only driveway; no left-turns would be permitted at this location.

Combined Impacts. The two projects are located within different analysis areas. The future cumulative analysis included related projects, either under construction or planned, located within each project's study area. The lists of related projects for the Transportation Facility and Sunset Avenue do not share any projects. Therefore, the two projects would not have impacts other than those reported for each project individually.

3. CUMULATIVE IMPACTS

Cumulative effects of traffic have been incorporated into the above analysis for the Transportation Facility and Sunset Avenue Projects. Consequently, impacts of cumulative growth are already incorporated in the traffic models for each project and are equivalent to those indicated for the "Future Without Project" conditions column in Table IV.I-10 and Table IV.I-11 on pages 350 and 352, respectively.

The cumulative impact analysis includes a Congestion Management Program (CMP) LOS analysis. The CMP was adopted to track regional traffic growth, building permits and transportation improvements. The CMP designated a transportation network, including all state highways and some arterials within the County, to be monitored by local jurisdictions. If the LOS standard deteriorates on the CMP network, then local jurisdictions must prepare a

Table IV.I-11

SUNSET AVENUE PROJECT
INTERSECTION OPERATING CONDITIONS – (SATURDAY)

No.	Intersection	Peak Hour	Future Without Project		Future with Project		
			V/C	LOS	V/C	LOS	Impact
2.	Main Street & Rose Ave.	P.M.	0.661	B	0.689	B	+0.028
3.	Main Street & Sunset Ave.	P.M.	0.411	A	0.448	A	+0.037
4.	Main Street & Thornton Place	P.M.	0.329	A	0.337	A	+0.008
5.	Main Street & Abbot Kinney Blvd.	P.M.	0.573	A	0.601	B	+0.028
6.	Abbot Kinney Blvd. & Venice Blvd.	P.M.	0.774	C	0.777	C	+0.003
8.	Pacific Ave. & Rose Ave.	P.M.	0.563	A	0.574	A	+0.011
9.	Pacific Ave. & Sunset Ave.	P.M.	0.454	A	0.466	A	+0.012
10.	Pacific Ave. & Windward Ave.	P.M.	0.511	A	0.513	A	+0.002
11.	Pacific Ave. & Venice Blvd. (N)	P.M.	0.843	D	0.845	D	+0.002
12.	Pacific Ave. & Venice Blvd. (S)	P.M.	0.800	C	0.803	D	+0.003
13.	Rose Ave. & Lincoln Blvd.	P.M.	0.952	E	0.963	E	+0.011*
Santa Monica Delay Procedures			**Delay**	**LOS**	**Delay**	**LOS**	**Impact**
1.	Main Street & Ocean Park Blvd.	P.M.	13.7	B	14.1	B	+0.4
7.	Neilson Way & Ocean Park Blvd.	P.M.	10.2	B	10.2	B	+0.0

* *Denotes a significant impact.*

Source: Overland Traffic Consultants, Inc., July 2004.

deficiency plan to be in conformance. A CMP analysis of monitoring locations is required if the proposed project will add 50 or more trips during either the morning or afternoon peak hours or 150 peak-hours trips on the mainline freeways. A substantial change in freeway segments is defined as an increase or decrease of 0.10 in the demand to capacity ratio and a change in LOS.[190]

Based on the 2002 Congestion Management Program, the nearest CMP monitoring location to the West Los Angeles Transportation Facility is La Cienega Boulevard and Jefferson Boulevard. This intersection would not be significantly impacted by the proposed project, as shown in Table IV.I-6 on page 341. No other locations would require a CMP analysis.

In the absence of the Transportation Facility, future traffic conditions at the three study intersections are expected to worsen over existing conditions during both A.M. and P.M. peak hours. Although the project would contribute to a decline in service at each study intersection, the contribution would be less than significant, as it would not exceed the thresholds established

[190] *2002 Congestion Management Program for Los Angeles County, 2002.*

by LADOT. Therefore, no specific off-site mitigation measures are required for the Transportation Facility site.

The intersection of Lincoln Boulevard and Venice Boulevard is the closest CMP location to the Sunset Avenue Project. The proposed project does not exceed these CMP traffic growth limits at this location. Therefore, no additional CMP analysis is necessary.

Future traffic conditions without the Sunset project would result in reduced service, compared to existing conditions, at the 13 study intersections during both A.M. and P.M. peak hours. The proposed project would contribute to significant impacts at two of the study intersections prior to mitigation. Mitigation measures for the Sunset Avenue Project have been recommended at each significantly impacted intersection. The recommended mitigation measures would alleviate the significantly impacted intersections at:

- Main Street and Rose Avenue;
- Main Street and Sunset Avenue; and
- Rose Avenue and Lincoln Boulevard.

4. MITIGATION MEASURES

a. West Los Angeles Transportation Facility

(1) Construction Mitigation

Mitigation Measure WLA-I.1: Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that at a minimum should include:

- Identification of a designated haul route to be used by construction trucks;
- Provide an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures, emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;
- Provide a schedule of construction activities;
- Limitations on any potential lane closures to off-peak travel periods;

- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;

- Coordinating deliveries to reduce the potential of trucks waiting to unload building materials;

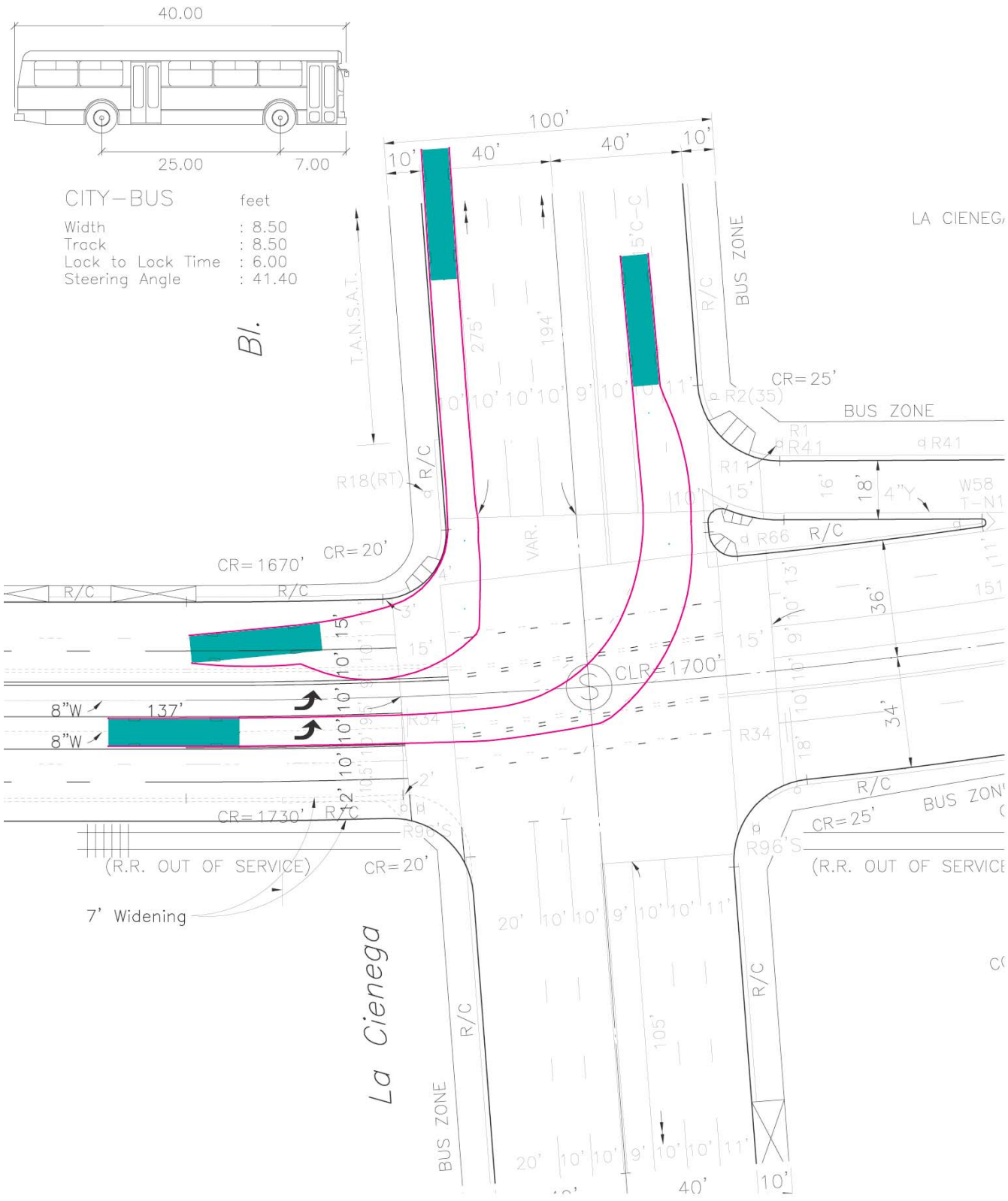
- Prohibiting parking by construction workers on neighborhood streets as determined in conjunction with city Staff.

(This measure addresses impacts regarding construction-related traffic as discussed on pages 338 through 339.)

(2) Operational Mitigation

Mitigation Measure WLA-I.2: Provide intersection modifications, such as street widening and restriping at the intersection of Jefferson and La Cienega Boulevards to alleviate the tight right-turn. Widen Jefferson Boulevard along the south side west of La Cienega Boulevard and shift the traffic lanes southerly providing a wider westbound curb lane for buses to turn into. This mitigation measure is shown in Figure IV.I-6 (showing bus turning with a standard bus) and Figure IV.I-7 (showing bus turning with an articulated bus) on pages 355 and 356, respectively. This street widening is within the proposed Exposition Light Rail Transit Project right-of-way and must be done in conjunction with any future Exposition transit project. The design of both projects shall be coordinated for compatibility.[191] Further, the improvements at this intersection shall include restriping of the left-turn queuing lane on Jefferson Boulevard to northbound La Cienega Boulevard to increase the storage capacity, pursuant to discussions with LADOT. (This measure addresses impacts regarding traffic at the Jefferson and La Cienega Boulevard intersection as discussed on page 343.)

[191] *This traffic analysis identified an alternative mitigation measure for this intersection. This measure would reroute the inbound buses to Rodeo Road and make the southbound right-turn at that intersection with another right turn from westbound Rodeo Road to northbound Jefferson Boulevard. The revised inbound route provides right-turn capacity that can accommodate the bus maneuvers but may create noise impact to nearby residential units. Supervisor Yvonne B. Burke's motion of September 25, 2003, Agenda Item No. 26, calls for avoiding this routing during peak periods, and the hours of 9:00 P.M. to 7:00 A.M. to avoid noise impact. Therefore, this alternative routing is not currently proposed. (The motion is included in this Draft EIR as Appendix H-1.)*

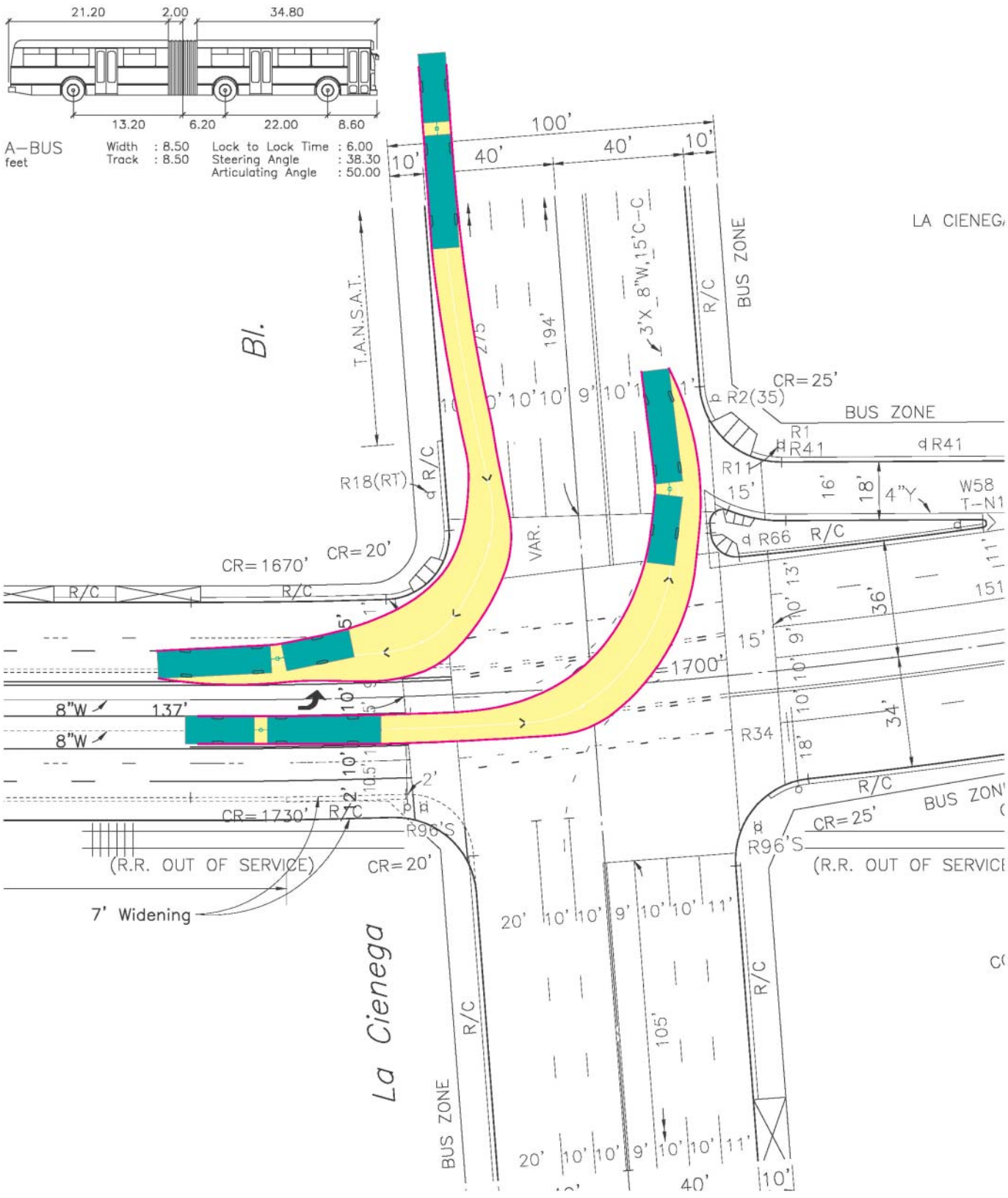


PCR

Not to scale

Figure IV.I-6
West Los Angeles Transportation Facility
Street Widening Mitigation

Source: Overland Traffic Consultation, Inc.



PCR

Not to scale

Figure IV.I-7
West Los Angeles Transportation Facility
Street Widening Mitigation
Articulated Bus

Source: Overland Traffic Consultation, Inc.

b. Sunset Avenue Project

(1) Construction Mitigation

Mitigation Measure Sunset-I.1: Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that should include:

- Identification of a designated haul route to be used by construction trucks;
- Provision of an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures (including, but not limited to, the use of a flagman during ingress and egress of trucks and heavy equipment), emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;
- Provision of a schedule of construction activities;
- Limitations on potential lane closures to off-peak travel periods;
- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordination of deliveries to reduce the potential of trucks waiting to unload building materials (delivery trucks shall be brought onto and stored within the project site);
- Prohibition of parking by construction workers on neighborhood streets as determined in conjunction with City;
- Identification of off-site staging procedures for haul trucks during excavation;
  - Haul truck staging shall occur on a designated major arterial street or off-street parking lot where the potential for residential parking and traffic impacts are less than significant. Off-site trucks shall then be called to the site for loading operations;
  - Staging on Main Street shall be avoided to the extent feasible. Any staging on Main Street shall be very limited and allowed only on special occasions and pre-approved by the City via a street use permit

- Provision of off-street parking capacity for construction workers with sufficient capacity for those who cannot park on-site during the demolition, grading, and parking structure construction phases, with shuttle services as necessary.

(This measure addresses impacts regarding construction-related traffic as discussed beginning on page 345 of this Section of the Draft EIR.)

(2) Operational Mitigation

Mitigation Measure Sunset-I.2: Right-Turn Restrictions – The proposed Main Street non-residential access shall be restricted to right-turns only (i.e., no left-turn ingress or egress will be permitted at this driveway). (This measure addresses impacts regarding traffic on Main Street as discussed beginning on page 346 of this Section of the Draft EIR.)

Mitigation Measure Sunset-I.3: Main Street and Rose Avenue – Implement the improvement listed for Main Street and Rose Avenue pursuant to the Venice Community Plan Transportation Program by restriping the east- and westbound Rose Avenue approaches to Main Street to provide an exclusive left-turn lane and on optional thru/right-turn lane. Implementation of this improvement would require the removal of approximately four on-street parking spaces on Rose Avenue east of Main Street. (This measure addresses impacts regarding traffic at Main Street and Rose Avenue as discussed beginning on page 346 of this Section of the Draft EIR.)

Mitigation Measure Sunset-I.4: Main Street and Sunset Avenue – Modify the southbound Main Street approach to Sunset Boulevard to provide an optional thru/left-turn lane, one through lane and a right-turn lane. Restripe the westbound Sunset Avenue approach to Main Street to provide an exclusive right-turn lane and one optional thru/left-turn lane. Construct and restripe the west leg of the intersection to include one exclusive right-turn lane and one through/left-turn lane. Implementation of this improvement would require the removal of approximately three on-street parking spaces on the west side of Main Street north of Sunset Avenue. (This measure addresses impacts regarding traffic at Main Street and Sunset Avenue as discussed beginning on page 346 of this Section of the Draft EIR.)

(The above required street improvements shall be guaranteed before the issuance of building permits through the B-permit process of the Bureau of Engineering.)

Mitigation Measure Sunset-I.5: Upgrade the existing pedestrian crossings located across Main Street at Sunset Avenue and across Pacific Avenue at Sunset Avenue with flashing markers/signage; i.e., "Smart Crosswalks." (This measure addresses impacts regarding traffic on Main Street as discussed beginning on page 346 of this Section of the Draft EIR.)

Mitigation Measure Sunset-I.6: Lincoln Boulevard and Rose Avenue – The proposed project shall provide a fair-share contribution to the planning and implementation of the rapid bus transit system on Lincoln Boulevard currently under study by the Lincoln Corridor Task Force (LCTF). (This measure addresses impacts regarding weekend traffic as discussed on page 351 of this Section of the Draft EIR.)

Mitigation Measure Sunset-I.7: Pursuant to Section 6 of the Coastal Transportation Corridor Specific Plan (CTCSP), the applicant, except as exempted, shall pay or guarantee payment of a Transportation Impact Assessment Fee (TIA) prior to issuance of any building permit, as applicable. (This measure addresses general impacts within the Specific Plan area as discussed beginning on page 346 of this Section of the Draft EIR.)

Mitigation Measure Sunset-I.8: The applicant shall consult with LADOT for driveway and internal circulation requirements. (This measure addresses impacts regarding site access as discussed on page 351 of this Section of the Draft EIR.)

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

West Los Angeles Transportation Facility. The traffic impacts associated with the construction activities are less than significant. (Mitigation measures were not required; however, pursuant to Standard Construction Practices, mitigation measures that reduce the non-significant impacts were proposed.) In addition, the Transportation Facility would not significantly impact any of the three study intersections analyzed; therefore, no mitigation measures were applied. Routing impacts would be less than significant with the proposed mitigation for Jefferson and La Cienega Boulevards.

Sunset Avenue Project. The proposed Work Area Traffic Control Plans that are recommended as project mitigation measures address specific adverse conditions that could arise due to conflicts between truck-haul activities and street traffic and pedestrian travel. These measures would reduce potential impacts to less-than-significant levels. Impacts associated with construction traffic are less than significant. Proposed mitigation measures for the three significantly impacted intersections would reduce operations impacts to less than significant.

Combined Impacts. The future cumulative analysis included related projects, either under construction or planned, located within each project's study area. The lists of related projects were developed pursuant to direction from the LADOT, Culver City and Santa Monica. The lists of related projects for the Transportation Facility and Sunset Avenue do not share any projects. Therefore, their study areas are distinct and their combined impacts would be less than significant.

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PARKING

1. ENVIRONMENTAL SETTING

a. Existing Conditions

West Los Angeles Transportation Facility. The project site is located within an industrial area and was previously used for light industrial purposes. The site is currently vacant, and therefore has no on-site parking. Unrestricted on-street parking is located adjacent to the project site on Jefferson Boulevard.

Sunset Avenue Project. The project site is located in a predominately residential neighborhood in close proximity to Venice Beach and to numerous retail venues along Main Street and Abbott Kinney Boulevard. Presently, 78 diesel buses and approximately 144 employees operate several shifts from the project site in its present use as Metro's Division 6 maintenance facility. The site includes 54 bus stalls and 65 employee parking spaces. On-street parking is available on Main Street, Pacific Avenue, and on the north side of Sunset Avenue. Daytime parking restrictions occur on Main and Pacific Avenue, though nighttime parking is now permitted on Pacific Avenue between the hours of 8 P.M. and 8 A.M. Unrestricted parking is provided on the north side of Sunset Avenue. No on-street parking is provided on the south side of Sunset Avenue, adjacent to the project site.

Residential parking is very limited in the project area as a result of historical development patterns in which the coastal area of Venice developed prior to extensive reliance on the automobile for personal mobility. The local land use pattern, which is founded upon very small lot subdivisions, was first developed primarily for resort and summer vacation use, rather than as a year round residential community. The area was well served by local trolley systems (of which the project site was historically a critical element), which were interconnected with the regional rail system. As a result of these circumstances, off-street parking is not nearly as prevalent in this part of Venice as it is in neighborhoods that were designed with recognized dependence on private automobiles. Moreover, the local land use pattern with many walk streets and alleys providing vehicular access to individual lots does not accommodate on-street parking except in relatively rare circumstances. As a result, there is a substantial local parking deficiency, and this is exacerbated during the summer beach season by a daily influx of visitors. Finding on-street parking today is a challenge to the residents of the neighborhood at almost anytime, but particularly during the peak tourist seasons.

b. Regulatory Framework

West Los Angeles Transportation Facility. Parking regulations that apply to the proposed project are included in the Los Angeles Municipal Code (LAMC) for the zone designation MR1, Restricted Industrial Zone. Pursuant to 12.21 A.4, at least one automobile parking space is required for each 500 sq.ft. of floor area for commercial or industrial buildings.

Sunset Avenue Project. Parking provisions set forth in the Venice Coastal Zone Specific Plan reflect extensive analysis based on recent community input for the Community Plan and Coastal Land Use Plan. The Specific Plan sets forth the parking requirements below.

Residential:	2.25 spaces for each dwelling unit: this is comprised of 2 spaces per dwelling unit and 0.25 guest parking space per unit
Health Club:	1 space for each 150 sq.ft. of floor area
General Retail:	1 space for each 225 sq.ft. of floor area
Cafe:	1 space for each 50 sq.ft. of Service Area

Subsection Section 12.22 A.25 of the LAMC sets forth parking requirements for affordable housing incentives and density bonuses. Based on the affordable housing production incentives, a project located within 1,500 feet of a mass transit station or major bus route shall be required to provide parking at the ratio below:[192]

Affordable housing:	1.0 parking space for each dwelling unit

The Venice Coastal Zone Specific Plan, Subsection E, of Section 13 establishes Beach Impact Zone (BIZ) Parking Requirements. The proposed project is located within the BIZ, and is therefore subject to additional parking requirements to ensure coastal access for visitors as well as sufficient parking for residents. The Plan states that projects must provide parking based on the following provisions:

1. One parking space for each 640 square feet of ground floor area for commercial and industrial Venice Coastal Development Projects. In lieu of physically providing the spaces, a fee of $18,000.00 per space may be paid for up to 50 percent of the total number of parking spaces required in this subdivision. Provided, however, that no payment shall be allowed in lieu of any parking space required by LAMC

[192] *Metro provides routes 33 and 333 from downtown Santa Monica, along Main Street and Venice Boulevard. A bus stop is provided at Main Street and Sunset Avenue adjacent to the project site. The City of Santa Monica provides Route 1 along Main Street and Route 2 along Pacific Avenue from downtown Santa Monica to Windward Avenue.*

Section 12.21 A4. All fees shall be paid into the Venice Coastal Parking Impact Trust Fund.

2. One parking space for each 1,000 square feet of the ground floor area for multiple dwelling Venice Coastal Development Projects of three units or more. In lieu of physically providing the space, a fee of $18,000.00 per space may be paid for up to 100 percent of the total number of parking spaces required in this subdivision. Provided, however, that no payment shall be allowed in lieu of any parking space required by the LAMC. All fees shall be paid into the Venice Coastal Parking Impact Trust Fund.

3. In no event shall the number of Beach Impact Zone parking spaces required for Venice Coastal Development Projects of three or more dwelling units, or commercial or industrial Venice Coastal Development Projects, be less than one parking space for residential Venice Coastal Development Projects and two parking spaces for commercial and industrial Venice Coastal Development Projects.

2. ENVIRONMENTAL IMPACTS

a. Methodology

This analysis calculates the number of parking spaces that the West Los Angeles Transportation Facility and the Sunset Avenue Project would be required to provide pursuant to the applicable regulations and projected requirements. This indicated demand was then compared to the capacity proposed by each project to determine whether each proposed project would provide adequate parking to meet the applicable requirements. In addition, this section analyzes the parking impacts during construction.

b. Threshold of Significance

(1) Construction

The City of Los Angeles "L.A. CEQA Thresholds Guide" does not provide a specific threshold for construction impacts on parking. For purposes of this analysis, a short-term significant impact on parking would occur if:

- The proposed project would cause a substantial temporary inconvenience to automobile parkers during construction due to restrictions on parking during times of construction.

The Los Angeles CEQA Thresholds Guide (p. F.7-1) states the following regarding project impacts on parking:

- A project would normally have a significant impact on parking if the project provides less parking than needed as determined through an analysis of demand from the project.

Under a significance threshold that is based on this guidance, the proposed project would have a significant impact on parking if:

- ☐ The number of spaces required to accommodate project activities exceeds the number of parking spaces provided.

c. Analysis of Project Impacts

West Los Angeles Transportation Facility. Construction of the proposed project would result in temporary demands for employee parking and equipment staging areas. The number of workers and equipment would vary throughout the construction process. Construction hours and days are planned to occur between 7 A.M. to 3 P.M., Monday through Friday, with overtime hours and some weekends, as required. Construction would occur during an approximately 14-month period and would consist of three general phases. The site preparation work is estimated to take approximately one month, with site grading and excavation lasting an additional month in duration. Construction of the bus facility would take approximately 12 months to complete. Construction equipment, with the exception of trucks, would generally be stored on the construction site. Delivery trucks would be brought onto the project site and unloaded within the perimeter fence.

The first and second construction phases (demolition and excavation) would require approximately 10 to 25 construction workers.[193] The third phase (construction) would generate a range of approximately 30 to 50 construction workers.[194] When on-site staging and parking is not available, a secondary staging area is planned to occur in the parking lane on the east side of Jefferson Boulevard, adjacent to the site. The project applicant would be required to submit formal construction staging and traffic control plans. Short-term on-street parking impacts may occur in the immediate area during the busiest construction phases (e.g., foundation, building shell and finish construction phases). However, due to the size of the project site and the relatively limited area of the proposed structural improvements, considerable on-site parking

[193] *R. S. Means Company, Inc., Heavy Construction Cost Data, 14th Edition, 2004.*

[194] *Ibid.*

capacity should be available during most of the construction period for construction workers. As a result, substantial off-site parking inconvenience would not occur and a less than significant parking impact would occur during construction. To further reduce the parking impact, the project applicant would be required to submit formal construction staging and traffic control plans that identify alternative crew parking locations and prohibit parking by construction workers on neighborhood streets pursuant to the traffic mitigation program.

Upon the completion of construction, the proposed project would provide surface parking for up to 175 buses. Based on the LAMC requirement for industrial uses of one parking space for every 500 sq.ft., the proposed project would be required to provide 144 parking spaces.[195] The project would provide a parking deck with 240 employee spaces serving the employees working on-site in maintenance and administrative functions as well as bus driving staff. These parking provisions exceed the parking requirements set forth in the LAMC, as shown in Table IV.J-1 on page 365. The project applicant has designed the proposed Transportation Facility on the basis of the work program and specific site activities associated with the maintenance and servicing of the 175 buses. The number of employees on-site would vary over the course of a day. The greatest number of employees would be on-site during the day shift. The number of employees during this shift is estimated to be 193 workers, a number well below the number of spaces provided. Construction of the Transportation Facility's driveway would result in the loss of approximately three parking spaces.[196] However, the demand for on-site parking, and LAMC requirements would be more than met by the proposed project. Therefore, the Transportation Facility's parking impact during operation would be less than significant.

Sunset Avenue Project. Parking demands would be generated by workers, equipment, haul trucks and delivery vehicles during construction. Construction hours and days are planned to occur from 7 A.M. to 3 P.M., Monday through Friday, with overtime hours and some weekends, as required. Construction equipment and worker cars would generally be contained on-site. In addition, delivery trucks would be unloaded on the project site within a perimeter fence. At times when on-site staging is not available, a street use permit would be required to stage larger construction equipment and trucks in the Main Street parking lane adjacent to the site, utilizing approximately 14 metered parking spaces.

Construction of the Sunset Avenue Project would be completed in approximately 24 months and would occur in three general phases, each phase generating its own combination of construction equipment. The number of construction workers and construction equipment

[195] *72,000 sq. feet/500 sq. ft. =144 parking spaces. The project includes approximately 72,000 sq.ft., inclucive of all auxiliary facilities.*

[196] *Based on an estimate of 20 feet per on-street parking space.*

Table IV.J-1

PARKING REQUIREMENTS – PROPOSED PROJECTS

Land Use	Size	Requirements	Required Spaces	Project Provided Spaces [a]	Difference
TRANSPORTATION FACILITY PROJECT					
Industrial	72,000 sq.ft.	1.0/500 sq.ft.	144	240	+96
Total			**144**	**240**	**+96**
SUNSET PROJECT					
Residential					
Multi-Family	208 market rate units	2.25/unit	468	468	Same
	17 affordable units	1.0/unit	17	17	Same
Commercial					
Health Club	7,000 sq.ft.	1.0/150 sq.ft.	47	47	Same
Retail	2,000 sq.ft.	1.0/225 sq.ft.	9	9	Same
Outdoor Cafe	1,000 sq.ft.	1.0/50 sq.ft.	20	20	Same
Beach Impact Zone					
Residential	55,300 sq.ft. [b]	1.0/1,000 sq.ft.	55	55	Same
Commercial	10,000 sq.ft.	1.0/640 sq.ft.	16	16	Same
Proposed Additional Parking			**0**	**44**	**+44**
Total			**632**	**676**	**+44**

[a] *Los Angeles Municipal Code required parking would represent the minimum number of parking spaces that the project would provide.*

[b] *Ground floor only.*

Source: PCR Services Corporation, May 2004.

would vary throughout the construction process in order to maintain a reasonable schedule of completion. The surrounding neighborhood would experience different impacts based on the phase, its duration and equipment mix. Site preparation would occur during the first phase, which is expected to last two months. This phase would generate approximately 20 employees and a mix of construction equipment generally including bulldozers, loaders, backhoes and tractors.[197] On-site employee parking during this phase could be limited, requiring employees to find parking elsewhere, which may impact parking in the surrounding neighborhood. The second phase, site grading, would generate approximately 35 employees during a three-month duration.[198] Some on-site employee parking would be available during the site grading phase as well as subsequent construction phases. However, due to the increase in the number of

[197] *R. S. Means Company, Inc., Heavy Construction Cost Data, 14th Edition, 2004.*

[198] *Ibid.*

employees in this phase, varying on-site parking, and potential construction equipment staging on Main Street, on-street parking could be further affected in the project area.

Construction of the parking garage would begin at the onset of phase three and be completed in approximately four months. Upon completion of the parking garage, on-site parking would be available in the parking garage for the remaining 15 months of construction. The building/construction phase would generate approximately 50 to 100 employees.[199] As with the second construction phase, on-street parking may be reduced. Furthermore, if construction work hours could occur during one or more summer weekends, parking throughout the neighborhood would be severely limited. As a result, the Sunset Avenue Project would cause a substantial temporary inconvenience to automobile parkers during construction and a significant parking impact could occur during construction. The traffic mitigation program (as described in Section IV.I, Transportation and Circulation) would require the approval of a Work Area Control Plan to minimize potential conflicts between construction activities, residents, street traffic, and pedestrians. In addition, parking mitigation measures are proposed to address temporary parking impacts in the community. Such mitigation measures would reduce potential short-term impacts to less-than-significant levels.

Following construction, the entire project would rely on the newly provided parking capacity in the two-level subterranean parking facility. Commercially available parking for beach visitors and business patrons would be located on-site within the subterranean parking facility. The project would provide 676 parking spaces. Of these, 561 spaces are intended to meet the needs of on-site uses in accord with City ordinances, 71 spaces are intended to meet parking needs pursuant to Beach Impact Zone regulations, and the remaining 44 units would be in excess of parking requirements and could be used to provide fee parking for surrounding residents. Based on a maximum of 225 dwelling units and the proposed commercial program, and the Beach Impact Zone requirements, 632 parking spaces would be required to comply with LAMC and the Venice Coastal Zone Specific Plan, as shown in Table IV.J-1 on page 365. The Specific Plan requirements are based on recent evaluations of parking needs in the area and reflect the expected demand that would be generated by the project's uses. The parking that is provided under Beach Impact Zone requirements would not be required to meet any demand generated by project activities nor would the additional 44 excess spaces proposed to supplement parking in the area, and that could be used to provide fee parking for surrounding residential uses. Therefore, project parking would meet all parking regulations and would exceed the amount of parking needed to meet demand generated by project activities by 115 spaces. The provision of 115 parking spaces is equal to the parking demand generated by 46 residential units.[200] Therefore, the proposed project would not only meet the parking demand, it would provide

[199] *Table A9-17 of SCAQMD, CEQA Air Quality Handbook, November 1993.*

[200] *One hundred fifteen spaces with 2.25 parking spaces/unit = 46 residential units.*

increased parking opportunities in a parking-deficient neighborhood. Parking impacts would be less than significant.

In addition to on-site parking, the project will dedicate 16 feet along the site's Sunset Avenue frontage to provide a 40-foot wide street with a 6-foot sidewalk easement along the south side for pedestrian access. The 40-foot street width would be sufficient to provide 14 diagonal parking spaces along the south side of Sunset Avenue west of the proposed project driveway on Sunset Avenue, which would be 14 more on-street parking spaces than exist along that side of Sunset Avenue today. Improvements for site access would require the removal of approximately four on-street parking spaces on Rose Avenue east of Main Street and approximately three on-street parking spaces on the west side of Main Street north of Sunset Avenue, a total of seven on-street spaces in the project locale, which would be seven spaces less than the 14 diagonal spaces proposed on a widened Sunset Avenue adjacent to the site. Therefore, street parking impacts would result in a net benefit of seven parking spaces and no adverse on-street parking impacts.

3. CUMULATIVE IMPACTS

The only two related projects in the immediate vicinity of the Transportation Facility are an 11,000 sq.ft. live/work development on Eastham Drive and the Exposition LRT project with its park and ride transit facilities proposed on La Cienega Boulevard. It is expected that all related projects would be required to provide parking capacity in compliance with the City of Los Angeles and Culver City requirements, respectively. The EIS/EIR for the LRT Project has identified potential parking impacts along the LRT corridor and recommended mitigation measures that would reduce such impacts to less-than-significant levels.[201] As the proposed project would meet all of its parking requirements on site, the project would not contribute to a cumulative significant impact on parking.

In regard to the Sunset Avenue Project, the two related projects in the immediate vicinity include the 51-unit Venice Art Lofts Project and a 35-unit condominium project, soon to start construction. Both related projects are located across Main Street. All related projects would be expected to provide parking capacity in compliance with the City of Los Angeles. Therefore, the cumulative impacts of related projects would be less than significant and would not dilute the beneficial parking effects of the proposed project.

[201] *Mid-City/Westside Transit Draft EIS/EIR, April 2001.*

4. MITIGATION MEASURES

West Los Angeles Transportation Facility Project. The Transportation Facility would have no adverse impacts on existing local parking resources and no mitigation measures are required.

Sunset Avenue Project. The Sunset Avenue Project would have no adverse impacts on existing local parking resources during operation and no mitigation measures are required. However, a short-term adverse parking impact would occur during construction. As such, the following mitigation measures are proposed.

Mitigation Measure Sunset-J.1: Off-site parking areas, with adequate capacity to serve existing demand and construction worker demand, such as the public parking lot located one block north of the site shall be used for construction worker parking when on-site parking capacity is insufficient. Such off-site parking areas shall be located within walking distance of the project site or shuttle service shall be provided by the contractor between the off-site parking areas and the project site. (This measure addresses impacts regarding construction-related parking as discussed beginning on page 364 of this Section of the Draft EIR.)

Mitigation Measure Sunset-J.2: With the implementation of Mitigation Measure Sunset-J.1, construction workers shall not be allowed to park on the residential neighborhood streets. (This measure addresses impacts regarding construction-related parking as discussed beginning on page 364 of this Section of the Draft EIR.)

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

West Los Angeles Transportation Facility. There would be no adverse significant impacts, and therefore, mitigation measures are not required. LAMC requirements would be met with on-site parking facilities.

Sunset Avenue Project. With implementation of the mitigation measures, parking impacts during construction would be reduced to less-than-significant levels. There would be no adverse significant impacts during operation of the proposed project and, therefore, mitigation measures are not required. Specific Plan requirements for residential uses as well as beach impact zone parking would be met with on-site parking facilities located in the subterranean parking structure. The Sunset Avenue Project would provide 71 parking spaces beyond project needs in compliance with the Specific Plan's Beach Impact Zone requirements, and it would provide an additional 44 spaces that could be used to provide fee parking for surrounding residents. Fourteen diagonal street parking spaces would be provided along the south side of

Sunset Avenue. As a result, the proposed project would have a net beneficial impact on parking in a parking-deficient neighborhood.

Combined Impacts. Parking impacts occur in a localized area, generally within 0.25 mile of a proposed project. The West Los Angeles Transportation Facility and the Sunset Avenue Project are approximately six miles apart, and therefore no combined impacts on local parking resources would be experienced in either project locale, nor in areas located between the respective project sites.

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
K. UTILITIES
1. WATER

1. ENVIRONMENTAL SETTING

a. Existing Conditions

West Los Angeles Transportation Facility. Within the City of Los Angeles, potable water is provided by the Los Angeles Department of Water and Power (DWP). DWP is responsible for supplying water that meets applicable California health standards and regulations for drinking water. DWP's water supply is collected from various sources in the western United States, including local groundwater and reclaimed water. In-state sources are located in the Owens Valley and the Sacramento-San Joaquin Delta via the Los Angeles Aqueduct (LAA) and California Aqueduct, respectively. Water is also supplied from the Colorado River. Local groundwater is collected primarily from wells in the San Fernando Valley and has provided up to 14 percent of the total supply for the last three years; this percentage is down due to water quality concerns with migration of contamination plumes. Two Owens Valley aqueducts owned by the City transport water from the eastern slopes of the High Sierras. Historically, the Owens Valley supplied a large majority of the City's water supply, but the amount of water that the City can divert from this source has been significantly reduced as a result of the settlement of environmental litigation. Reduction in LAA water delivery has been significant over the past 12 years; the decease in water delivery is down almost 44 percent to contribute 30 percent of the total supply for the City. The remainder of the water supply is purchased from the Metropolitan Water District (MWD) and delivered either from the Colorado River or from the Sacramento-San Joaquin Delta via the California Aqueduct. Water purchased from the MWD contributes over half of the City's yearly supply. In fiscal year 2002-2003, the DWP supplied 1,818 acre feet (AF) of water per day.[202]

[202] *City of Los Angeles Department of Water and Power, Urban Water Management Plan Fiscal Year 2002-2003 Annual Update.*

DWP has instituted significant water conservation measures that were particularly successful in reducing water demand during the drought of 1992. Current water reclamation facilities process 20 million gallons per day (mgd) to 67 mgd of reclaimed water, which is used primarily for irrigation.[203] Conservation programs have reduced demand by over 15 percent annually through extensive public education and outreach efforts including a toilet exchange and rebate program promoting use of ultra low flush toilets and free replacement of low flow showerheads.[204] In 1995, reclaimed water supplied about 3,000 to 4,000 AF of water (about 6 percent of the total demand), and the City expects to supply up to 12 percent (90,000 AF) of its total water demand with reclaimed water by the year 2015. DWP supplies water that meets or exceeds all health-related state and federal standards, accomplished in part by the following procedures: (1) filtration of the Los Angeles Aqueduct supply at a state-of-the-art filtration plant; (2) control of access to water supply and storage areas; (3) control of algae growth and/or covering of reservoirs; (4) continuous disinfection of water entering mains; (5) water quality testing, inspection, cross-control prevention, and older main replacement.[205]

Water supply infrastructure includes water storage facilities, transmission and distribution pipelines, booster-pumping stations, pressure reducing stations, chlorination stations and other related facilities. Water storage is essential for the conservation of water to supply daily peaks, meet high demand conditions, and provide for firefighting and emergencies. The City water system has 110 tanks and reservoirs ranging in size from 10 thousand to 60 billion gallons with a total capacity of 109 billion gallons. Water is distributed through a network of over 7,100 miles of water mains ranging from 4 inches to 120 inches in diameter. Because of the size and range in elevation (0 to 2,400 feet) the system has been divided into 102 pressure zones, with almost 90 booster pumping stations to provide water service at higher elevations.[206]

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[203] *City of Los Angeles DWP Bureau of Sanitation website, "Major Activities," www.ci.la.ca.us/SAN/santext/sanmact.htm.*

[204] *City of Los Angeles Department of Water and Power, Urban Water Management Plan Fiscal Year 2002-2003 Annual Update.*

[205] *Written communication from Juile M. Spacht, Manager of Water Distribution Engineering, City of Los Angeles Department of Water and Power, January 14, 2002, and telephone communication with Luis Nuno, City of Los Angeles Department of Water and Power, November 8, 2002.*

[206] *City of Los Angeles Department of Water & Power website, "Water Services," www.ladwp.com/ladwp/cms/ladwp001966.jsp.*

Water for domestic and fire purposes is supplied to the project site via an existing 6-inch service line which is connected to an 8-inch Los Angeles Department of Water and Power main which travels along the western property frontage on Jefferson Boulevard. Another water main line connecting to the 6-inch service line travels along a private road on the northern edge of the property. These two mains connect to form a loop with adjacent 8-inch and 12-inch mains along Rodeo Road and La Cienega Boulevard.[207] The 8-inch main line can provide public fire flow demand of approximately 2,500 gallons per minute (gpm) to the site. The vacant status of the site precludes it from generating water demand for domestic or fire flow consumption.

Sunset Avenue Project. The location of this site is also within the service area of the Los Angeles Department of Water and Power (DWP) delivers potable water through its water supply infrastructure to the site.[208,209,210] Water for domestic and fire purposes is supplied to the project site via two existing service lines along the Main Street frontage: a 4-inch line and a ¾-inch service line. There are four Los Angeles Department of Water and Power mains that are routed along three sides of the site. Those include an existing 8-inch main along Main Street and two mains along Sunset Avenue, 4-inches and 6-inches, respectively, and a 12-inch main located in Pacific Avenue. The 8-inch main line along Main Street can provide public fire flow demand of approximately 2,500 gallons per minute (gpm), the 4-inch and 6-inch lines along Sunset Avenue provide off-site fire flow of 600 gpm and 1,400 gpm. The on-site fire flow capacity is currently 600 gpm at 72 psi. This capacity allocates for on-site fire flow systems such as overhead sprinkler networks.[211]

[207] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 Bus Service Facility Located at Jefferson Boulevard and Rodeo Road, Los Angeles – Utility Study. April 30, 2004.*

[208] *City of Los Angeles Department of Water and Power, Urban Water Management Plan Fiscal Year 2002-2003 Annual Update.*

[209] *Written communication from Juile M. Spacht, Manager of Water Distribution Engineering, City of Los Angeles Department of Water and Power, January 14, 2002, and telephone communication with Luis Nuno, City of Los Angeles Department of Water and Power, November 8, 2002.*

[210] *City of Los Angeles Department of Water & Power website, "Water Services," www.ladwp.com/ladwp/cms/ ladwp001966.jsp.*

[211] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 "The Depot" Apartments Located at 100 Sunset Avenue, Los Angeles – Utility Study, April 30, 2004.*

b. Regulatory Framework

Ordinances in the City of Los Angeles pertaining to water supply, conservation and health are numerous and updated periodically. City of Los Angeles Ordinance Nos. 163,532 and 164,093 adopted in 1988, require new buildings to utilize low-flush toilets and urinals (1.5 gallons per flush) in order to obtain building permits. In addition, Title 20 of the California Administrative Code (CAC) Section 1604 establishes efficiency standards (i.e., maximum flow rates) for all new showerheads, lavatory faucets, and sink faucets and prohibits the sale of fixtures that do not comply with the regulations. City Ordinance No. 163,532 also contains provisions requiring xeriphytic (low water consumption) landscaping.

Under Senate Bill (SB) 901, Public Resources Code (PRC) and California Water Codes (CWC) Section 10910 when a lead agency prepares a Notice of Preparation (NOP) for an EIR for a project as defined by Water Code Section 10192, the water agency must assess whether the water demand anticipated for the project is covered by the water agency's master water management plan. Additional state legislation has been passed in recent years, including SB 221 and SB 610. SB 221 requires written verification from the water provider that sufficient water supplies are available to serve a proposed subdivision of 500 or more units or that the local agency make a specified finding that sufficient water supplies are or will be available prior to completion of the project. SB 610 requires that the water service provider prepare a water supply assessment requested by a city or county for "project" as defined by Section 10912 of the Water Code. According to Section 10912, a "project" is defined as: (1) a residential subdivision of more than 500 units; (2) a shopping center or business establishment employing more than 1,000 persons or having more than 500,000 sq.ft. of floor space; (3) a commercial office building employing more than 1,000 persons or having more than 250,000 sq.ft. of floor space; (4) a hotel, a motel, or both, having more than 500 rooms; (5) an industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sq. ft. of building area; (6) a mixed-use project that includes one or more of the elements mentioned herein; or (7) a project that would demand an amount of water equivalent to, or great than, the amount of water required by a 500-dwelling unit project.

DWP updates its Urban Water Management Plan every five years to account for changing conditions. Variations in environmental conditions such as precipitation, snowpack and other environmental factors affect the annual water supply for the City of Los Angeles. This Plan documents those yearly fluctuations in water supply availability and subsequent demands. The Urban Water Management Plan Update also projects water supply and distribution needs based on anticipated growth in population, housing and employment and identifies water supply

strategies to meet this demand.[212] DWP's most recent Urban Water Management Plan indicates that adequate water supplies will be available to serve planned growth and development in DWP's service territory.

2. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of potential water usage impacts was undertaken, first, by establishing the current capacity of the existing water supply and the existing water distribution system, deriving the additional increase in demand for usage attributable to both projects, and assessing whether the existing capacity is sufficient to accommodate the added demand for domestic water and emergency fire flows for the project.

b. Thresholds of Significance

The following factors are set forth in the City of Los Angeles' *CEQA Thresholds Guide*, for consideration on a case-by-case basis in making determinations of significance:

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

[212] *City of Los Angeles Department of Water and Power, Urban Water Management Plan Fiscal Year 2002-2003 Annual Update.*

Based on these factors, a project would have a significant water impact if:

9 The City's water supplies and water distribution capacity would be inadequate to serve the proposed use after appropriate infrastructural improvements have been installed.

c. Analysis of Project Impacts

West Los Angeles Transportation Facility. The Los Angeles DWP does not provide water demand data by land use. Therefore, to forecast water consumption from the proposed development, existing water infrastructure capacities and generation factors from the City of Los Angeles Department of Public Works were utilized to analyze the project's potential impact.

Water demand due to the West Los Angeles Transportation Facility under conditions of full use was calculated utilizing wastewater generation factors provided by the City of Los Angeles, Department of Public Works, Bureau of Engineering factored by 115 percent to provide a conservative assessment of actual water demand. As shown on Table IV.K.1-1 on page 376, the project would result in total domestic water demand of 6,624 gpd, all of which would be over existing conditions since no water is utilized on the project site presently. The water consumption factors used to calculate the project's water demand do not reflect potential beneficial impacts of compliance with water conservation measures in new construction and are, therefore, conservative estimates. The project will be required to comply with local and State regulations regarding water conservation. Thus, daily project water consumption would be 0.0011 percent of DWP's current daily water distribution. In addition, the West Los Angeles Transportation Facility falls below the floor area, employee or residential population thresholds that trigger preparation of a site-specific water supply assessment subject to the Senate Bill 610.

The DWP's needed water supply is projected using population projections from the 2000 Water Plan which bases its demand on the 1998 Southern California Association of Governments (SCAG) *Regional Transportation Plan*. Water Plan projections extend into the 2010 and 2020 horizon and indicate that known sources can accommodate forecasted regional growth through that time period. The employee population within the proposed project represents a very small fraction of those forecasted in the regional growth increments addressed in the Water Plan. The DWP prepares for fluctuations in supply from local and state water sources by purchasing additional water from the Metropolitan Water District to meet the demand of the DWP customers.[213] Therefore, based on the conservative project water demand estimates

[213] *City of Los Angeles Department of Water and Power, Urban Water Management Plan Fiscal Year 2002-2003 Annual Update.*

Table IV.K.1-1

WEST LOS ANGELES TRANSPORTATION FACILITY
EXISTING AND PROJECTED WATER DEMAND

Land Use	Building Area (sq.ft.)	Factor [a]	Total (gpd)
Existing Demand			
Vacant Property	0	0 gpd/ksf [b]	0
Total Existing Demand			**0**
Projected Demand			
Bus Transportation Facility	72,000 [c]	92 gpd/ksf [b]	6,624
Net Change			**6,624**

[a] *Water demand rates are equal to 115 percent of wastewater generation factors as provided by the City of Los Angeles, Department of Public Works, Bureau of Engineering, Development Services Division – Sewer Worksheet. June 6, 1996.*
[b] *ksf = 1,000 sq.ft.*
[c] *Approximate total area of all buildings and auxiliary facilities.*

Source: PCR Services Corporation, May 2004.

generated and the indicated ability by the DWP to accommodate demand in the future, the West Los Angeles Transportation Facility will have no adverse impact on the City's water supply and no mitigation is required.

The capacity of the existing 6-inch service line and the 8- and 6-inch water mains serving the project site will be sufficient to handle the new proposed use of the site.[214] No upgrade or expansion of the water delivery system is necessary in order to accommodate the new development. DWP will provide water service to the site from its existing supply. The site can accommodate fire service pressure of 600 gpm at 97 psi, which exceeds the proposed need of 475 gpm for on-site fire systems such as overhead sprinklers. As such, the fire flow to the project site is adequate to serve the project.[215] Therefore, the West Los Angeles Transportation Facility will have no adverse impact on the City's water distribution systems and no mitigation is required.

Sunset Avenue Project. Water demand attributable to the Sunset Avenue project was also calculated utilizing wastewater generation factors provided by the Bureau of Engineering, which were also factored by 115 percent to provide a conservative assessment of actual water

[214] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 Bus Service Facility Located at Jefferson Boulevard and Rodeo Road, Los Angeles – Utility Study, April 30, 2004.*

[215] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 Bus Service Facility Located at Jefferson Boulevard and Rodeo Road, Los Angeles – Utility Study, April 30, 2004.*

demand including landscape irrigation. As shown on Table IV.K.1-2 on page 378, the project would result in total domestic water demand of 39,986 gpd, an indicated increase in on-site water consumption of approximately 38,578 gpd over existing conditions or only 0.0065 percent of DWP's current daily water distribution. The water consumption factors used to calculate the project's water demand do not reflect potential beneficial impacts of compliance with water conservation measures in new construction and are therefore conservative estimates. Like the West Los Angeles Transportation Facility, this project will be required to comply with local and State regulations regarding water conservation. Since the resident and employee populations to be associated with the proposed project represent very small fractions of the regional growth increments addressed in the DWP's 2000 Water Plan, DWP's water supply is expected to be quite sufficient to satisfy this project's water demand.[216] Also, with a maximum of 225 dwelling units and 10,000 sq.ft. of commercial space, the Sunset Avenue Project falls well below the threshold of over 500 dwelling units or over 500,000 sq.ft. of commercial space that trigger required preparation of a formal water supply assessment described by SB221 and SB610. Although this site is currently used as a Metro bus maintenance facility, no upgrade or expansion of the water delivery system is necessary in order to accommodate the new mixed-use development. Capacity data provided by the Department of Public Works indicates that the existing water mains in Main Street and Sunset and Pacific Avenue will be sufficient to serve the proposed mixed residential and commercial development.[217] This infrastructure can provide fire service pressure of 600 gpm at 72 psi, which exceeds the proposed need of 475 gpm for on-site fire systems such as overhead sprinklers. As such, the fire flow to the project site would be adequate to serve the project.[218] The Sunset Avenue Project would not have adverse impacts on the City's water infrastructure and supply and no mitigation measures are required.

Combined Impacts. The combined water demand for the West Los Angeles Transportation Facility and the Sunset Avenue projects would result in a total increase in domestic water demand of 45,202 gpd. Thus, daily combined project water consumption would be less than 0.0076 percent of DWP's current daily water distribution. Therefore, the projects would have a less than significant impacts on water infrastructure or supply, thus there would be no significant combined impacts.

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[216] *City of Los Angeles Department of Water and Power, Urban Water Management Plan Fiscal Year 2002-2003 Annual Update.*

[217] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 "The Depot" Apartments Located at 100 Sunset Avenue, Los Angeles – Utility Study. April 30, 2004.*

[218] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 "The Depot" Apartments Located at 100 Sunset Avenue, Los Angeles – Utility Study, April 30, 2004.*

Table IV.K.1-2

SUNSET AVENUE PROJECT
EXISTING AND PROJECTED WATER DEMAND

Land Use	Building Area (sq.ft.)	Factor [a]	Total (gpd)
Existing Demand			
Bus Maintenance Facility	15,300	92 gpd/ksf [b]	1,408
Total Existing Demand			**1,408**
Projected Demand			
Dwelling Units	225 units	172.5 gpd/ [c]	38,813
Health Club/Spa	7,000	92 gpd/ksf	644
Retail	2,000	92 gpd/ksf	184
Coffee Shop	1,000	345 gpd/ksf	345
TOTAL			**39,986**
Net Change			**38,578**

[a] *Water demand rates are equal to 115 percent of wastewater generation factors as provided by the City of Los Angeles, Department of Public Works, Bureau of Engineering, Development Services Division – Sewer Worksheet. June 6, 1996.*
[b] *ksf = 1,000 sq.ft.*
[c] *115 percent of wastewater generation factor for a mix of one and two bedroom dwelling units with two-bedroom units representing 75 percent of the mix.*

PCR Services Corporation, May 2004.

3. CUMULATIVE IMPACTS

As identified in Section III.B, Related Projects, of this Draft EIR, 11 other projects in the vicinity are related to the proposed West Los Angeles Transportation Facility by virtue of proximity and timing for purposes of cumulative impact assessment. Table IV.K.1-3 on page 379 summarizes the increase in water demand attributable to these related projects, which is conservatively estimated at 110,300 gpd. When combined with water demand for the West Los Angeles Transportation Facility and its related projects, a cumulative total of 116,926 gpd is indicated in Table IV.K.1-3.

Similarly, 21 related projects have been identified in the greater vicinity of the Sunset Avenue Project. As summarized in Table IV.K.1-4 on page 380, these related projects are conservatively forecasted to generate increased water demand of 2,103,212 gpd. The total of the related projects and the proposed project is 2,141,790 gpd. The majority of this cumulative demand is due to the Playa Vista project, which accounts for almost 70 percent of the estimated total. As summarized in Table IV.K.1-5 on page 381, both projects and all of the respective

Table IV.K.1-3

WEST LOS ANGELES TRANSPORTATION FACILITY
WATER DEMAND FOR RELATED PROJECTS [a]

No.	Proposed Use	Size	Location	Generation Rate (gpd)	Generation (gpd)
1.	Apartments	8	4210 Duquesne Avenue	138 [c]	960
2.	Industrial	250,000	10100 Jefferson Boulevard	92 [b]	23,000
3.	Office	27,000	9050 Washington Boulevard	172.5 [b]	4,658
4.	Office/Condominiums	28	599 Jefferson Boulevard	184 [c]	5,152
5.	Office/Apartments	25,969	8601 Washington Boulevard	184 [b]	4,778
6.	Office	151,000	3505 Hayden Avenue	172.5 [b]	26,048
7.	Live/Work	2	8500 Washington Boulevard	207 [c]	414
8.	Live/Work	11,000	3525 Eastham Drive	184 [b]	2,024
9.	West LA College Phase I	175,000	West LA College	172.5 [b]	30,188
10.	Mixed Use	(estimates)	9300 Culver Boulevard		
	Commercial	26,400		172.5 [b]	4,554
	Retail	26,400		92 [b]	2,429
11.	Exposition LRT Project/LRT Jefferson Station	66,250	SEC Jefferson/La Cienega	92 [b]	6,095
				Subtotal	**110,300**
12.	West Los Angeles Transportation Facility	72,000	5853 Jefferson Boulevard	92 [b]	6,624
				Total	**116,926**

[a] *Water demand rates are equal to 115 percent of wastewater generation factors as provided by the City of Los Angeles, Department of Public Works, Bureau of Engineering, Development Services Division – Sewer Worksheet. June 6, 1996..*
[b] */1,000 sq.ft.*
[c] *Per residential unit.*

Source: Overland Traffic Consultants, Inc. April 2004

related projects would generate cumulative total demand for nearly 2,258,716 gpd or .38 percent of the DWP's current daily water delivery. Approximately 65 percent of this cumulative total is attributable to the Playa Vista project, which DWP has determined can be adequately served with available supplies.[219] These supplies are also sufficient for the remaining related projects, each of which will be evaluated on a project-by-project basis. No adverse cumulative water demand impacts would result directly due to the related projects identified in conjunction with the West Los Angeles Transportation Facility and the Sunset Avenue Project.

[219] *"Draft Environmental Impact Report: Village at Playa Vista," Volume 1, Book 3, Subsection IV.N.(1), Water Consumption, page 1092.*

Table IV.K.1-4

SUNSET AVENUE PROJECT
WATER DEMAND FOR RELATED PROJECTS [a]

No.	Proposed Use	Size	Location	Generation Rate (gpd)	Generation (gpd)
1.	Townhouses	111	SWC Washington Blvd. & Via Dolce	207 [c]	22,977
	Office	6,000		172.5 [b]	1,035
2.	Apartments	531	E/S Via Marina S/O Marquesas Way	184 [c]	97,704
	Hotel	288		138 [c]	39,744
3.	Apartments	1,201	E/S Via Marina S/O Panay Way	184 [c]	220,984
	Retail	4,000		92 [b]	368
	Commercial	6,000		172.5 [b]	1,035
4.	Apartments	100	Parcel 20 Panay Way	184 [c]	18,400
	Commercial	6,885		172.5 [b]	1,188
5.	Lofts	80	1046 Princeton Street	138 [c]	11,040
	Storage	8,000		23 [b]	184
6.	Apartments	300	Princeton Street and Carter Avenue	184 [c]	55,200
7.	Retail	42,270	4141 Lincoln Boulevard	92 [b]	3,889
	Restaurant	9,200		345 [b]	3,174
8.	Office	15,180	2100 Abbot Kinney Boulevard	172.5 [b]	2,619
9.	Gas Station	500	2005 Lincoln Boulevard	92 [b]	46
	Mini-Mart Retail	720		92 [b]	66
10.	Apartments	280	1430 Lincoln Boulevard	184 [c]	51,520
	Retail	197,000		92 [b]	18,124
11.	Condominiums	35	S/O 615 Hampton Drive	207 [c]	7,245
12.	Art lofts	51	615 Hampton Drive	138 [c]	7,038
13.	Condominiums	24	212 Marine Street	207 [c]	4,968
	Retail	9,000		92 [b]	828
14.	Apartments	44	2209 Main Street	184 [c]	8,096
15.	Apartments	26	2021-29 Main Street	184 [c]	4,784
	Retail	6,553		92 [b]	603
16.	Apartments	107	2012-24 Main Street	184 [c]	19,688
	Retail	11,549		92 [b]	1,063
17.	Condominiums	9	125 Pacific Street	207 [c]	1,863
18.	Civic Center Garage	110,625	1685 Main Street	92 [b]	10,178
	Retail	12,500		92 [b]	1,150
19.	RAND Headquarters	13,900	1700 Main Street	172.5 [b]	2,398
20.	Playa Vista	Phase 1	Jefferson & Lincoln Boulevards	[d]	965,000
		Phase 2		[d]	503,000
21	Condominiums	70	512 Rose Avenue	207 [c]	14,490
	Restaurant	3,953		345 [b]	1,364
	Bakery/Retail	1,726		92 [b]	159
				Subtotal	**2,103,212**
	Sunset Avenue Project	3.13 acres	100 Sunset Avenue		38,578
				Total	**2,141,790**

[a] *Water demand rates are equal to 115 percent of wastewater generation factors as provided by the City of Los Angeles, Department of Public Works, Bureau of Engineering, Development Services Division – Sewer Worksheet. June 6, 1996*
[b] */1,000 sq.ft.*
[c] *Per residential unit.*
[d] *Based on Playa Vista Draft EIRs: First Phase, September, 1992; Second Phase, August 2003.*

Table IV.K.1-5

WEST LOS ANGELES TRANSPORTATION FACILITY AND SUNSET AVENUE PROJECT TOTAL WATER DEMAND FOR RELATED PROJECTS

West Los Angeles Transportation Facility	
Related Projects	110,300 gpd
West Los Angeles Transportation Facility	6,624 gpd
Subtotal	**116,926 gpd**
Sunset Avenue Project	
Related Projects	2,103,212 gpd
Sunset Avenue Project	38,578 gpd
Subtotal	**2,141,790 gpd**
Total	**2,258,716 gpd**

Source: PCR Services Corporation, May 2004.

4. MITIGATION MEASURES

West Los Angeles Transportation Facility. Since this project would not result in significant adverse impacts to the City's water supply or conveyance systems as confirmed by the service provider, mitigation measures are not required.[220]

Sunset Avenue Project. This project also would not result in a significant adverse impact to the City's water supply or conveyance systems, as confirmed by the service provider. Therefore, mitigation measures are not required.[221]

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

West Los Angeles Transportation Facility and Sunset Avenue Project. No significant impacts to the City's water supply, infrastructure or related facilities would occur as a result of the West Los Angles Transportation Facility project or the Sunset Avenue Project.

[220] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 Bus Service Facility Located at Jefferson Boulevard and Rodeo Road, Los Angeles – Utility Study, April 30, 2004.*

[221] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 "The Depot" Apartments Located at 100 Sunset Avenue, Los Angeles – Utility Study, April 30, 2004.*

IV. Environmental Impact Analysis

1. ENVIRONMENTAL SETTING

a. Existing Conditions

West Los Angeles Transportation Facility. The City of Los Angeles operates wastewater treatment and reclamation facilities which serve approximately 600 square miles including most of the City of Los Angeles and 28 other cities and agencies in the region through contractual agreements. The Los Angeles Department of Public Works, Bureau of Sanitation, has expansive duties, which are specified by different bureaus. The Bureau of Sanitation operates the wastewater collection system, which includes two treatment plants, two water reclamation plants, biosolids management and other support programs such as monitoring and maintenance. The Bureau of Sanitation is also responsible for planning capital improvements, financial management of the Wastewater Program, and review and processing of water service charge adjustments.[222] The Bureau of Engineering provides design and construction engineering capabilities to the City's wastewater system.

Due to the wastewater collection system's dependence on gravity flow, wastewater service and planning areas are determined according to natural drainage patterns and, as such, do not typically conform to City boundaries. Municipalities that have contractual rights to discharge specific quantities of wastewater into the City of Los Angeles' wastewater system include the cities of Beverly Hills, Burbank, Culver City, El Segundo, Glendale, San Fernando, Santa Monica, and West Hollywood, in addition to portions of Inglewood, Alhambra, Pasadena, and South Pasadena. Other agreements contracting discharge into City wastewater collection and treatment facilities include County Sanitation Districts Nos. 5, 9, 11, 16, and 27, as well as the Los Virgenes Municipal Water District; several federal reserve and unincorporated areas, such as Marina del Rey; and the privately owned property known as Universal City.[223]

[222] *City of Los Angeles Dept. of Public Works. Bureau of Sanitation website. "Major Activities," www.ci.la.ca.us/SAN/santext/sanmact.htm.*

[223] *City of Los Angeles Dept. of Public Works Bureau of Engineering. Wastewater Facilities Plan Update. June 1989.*

Wastewater service requirements are related to the size and type of projects and geographic area served. New development projects may increase wastewater generation and affect wastewater collection and treatment systems. The City's Wastewater Capital Improvement Program (CIP) includes planned improvements to the City's major sewers, pumping plants and treatment/reclamations plants which are intended to provide capacity in the larger components for planned patterns of development. The current Wastewater Facilities Plan Update from June 1989 is going to be replaced by a comprehensive water management plan for all water resources and activities, including wastewater, for the Los Angles Basin. The Integrated Resources Plan (IRP) will detail future objectives for water, wastewater and runoff/storm water management throughout the City of Los Angeles.[224] The Hyperion Treatment Plant (HTP) is the primary sewage treatment facility for the City. Located southwest of the Los Angeles International Airport adjacent to the Santa Monica Bay, the HTP can process 450 mgd at full capacity for secondary treatment and dry weather flows averaged approximately 331 mgd, indicating available, unutilized dry weather capacity of 119 mgd.[225]

The project site is served by existing wastewater collection infrastructure consisting of an 8-inch sewer lateral, which joins the La Cienega Sanitary Sewer Trunk on-site via easement. There is no wastewater generated on-site due to its current vacant status.[226]

Sunset Avenue Project. Wastewater collection facilities serving the Sunset Avenue site are also maintained by the City's Bureau of Sanitation. The project site is currently connected to two existing 6-inch sewer mains, which provide adequate capacity for the operation of the on-site Bus Maintenance Facility, and which are also tributary to the Hyperion Treatment Plant. Based on factors provided by the City of Los Angeles, Department of Public Works, Bureau of Engineering, existing wastewater generation at the Sunset Avenue site is approximately 1,224 gpd. Please see Table IV.K.2-2 on page 386.

b. Regulatory Framework

Los Angeles City Ordinance No. 166,060 (Sewer Allocation) limits the yearly increase in total wastewater quantity discharged into the Hyperion Treatment Plant system to five million gallons per day. Additionally, Bureau of Engineering Special Order No. SO06-0691 reduced the design standard for peak dry weather flow in sanitary sewers from three-quarter depth to one-half

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[224] *Integrated Resources Plan website. "IRP Factsheet," http://online2.cdm.com/cityofla/IRP/IRP_Factsheets.asp.*

[225] *O'Hara, Kim, City of Los Angeles Department of Public Works, Bureau of Sanitation, May 17, 2002.*

[226] *Mollenhauer Group. Metropolitan Transit Authority, Division 6 Bus Service Facility Located at Jefferson Boulevard and Rodeo Road, Los Angeles. Utility Study. April 30, 2004.*

the sewer diameter to implement the City-adopted goal of no overflows or diversions from the wastewater collection system.

The current Wastewater Facilities Plan, which addresses the City's wastewater treatment and collection needs over a planning horizon through 2010, was adopted by the City Council on January 22, 1991. The Plan is currently being revised through an integrated resource planning effort to address demand and capacity through 2020 with new construction and expansion of facilities and operations, wastewater reclamation and conservation. The Integrated Resource Plan (IRP) will provide analysis of existing resources and evaluate future water and wastewater needs through various other planning and phasing documents such as Environmental Impact Reports, a Financial Plan, the Updated Wastewater Facilities Plan and Public Education. This document is expected to be complete in June 2005.[227]

2. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of potential wastewater collection and treatment impacts was based on a comparison of the increase in wastewater generation resulting from the West Los Angeles Transportation Facility and the Sunset Avenue Project relative to existing sewage collection capacity serving the site and treatment capacity at the Hyperion Treatment Plant.

b. Thresholds of Significance

The following thresholds of significance will be applied to the subject project as set forth in the City of Los Angeles' *CEQA Thresholds Guide* which states that a project would normally have a significant wastewater impact if:

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

[227] *Integrated Resources Plan web site, " IRP Fact Sheet," www.online2.cdm.com/cityofla/IRP.*

c. Analysis of Project Impacts

West Los Angeles Transportation Facility. Due to the unoccupied status of this site, no utility services are currently required or supplied. As such there is no wastewater generated on-site and no wastewater service is provided by the City. As shown in Table IV.K.2-1 on page 386, the West Los Angeles Transportation Facility is estimated to generate 5,760 gallons of wastewater per day. The existing 8-inch sewer lateral and the La Cienega Trunk Sewer have adequate unutilized collection capacity to serve this new increment of wastewater generation.[228] When comparing current available and unutilized wastewater capacity at the HTP, the West Los Angeles Transportation Facility's total wastewater generation is 0.005 percent of the 119 mgd of available dry weather wastewater capacity. Additionally the West Los Angeles Transportation Facility's total wastewater generation will be only 0.12 percent of the 5.0 mgd annual increase in total wastewater treated at HTP in accordance with Ordinance No. 166,060. As such, wastewater generation by the West Los Angeles Transportation Facility will be accommodated by the City's collection facilities and the Hyperion Treatment Plant.[229] Therefore, no adverse project impact on the City's wastewater infrastructure is expected.

Sunset Avenue Project. As shown in Table IV.K.2-2 on page 386, the proposed project would result in total annual wastewater generation of 34,770 gpd. This is an estimated increase of 33,546 gpd over existing on-site wastewater generation. The two existing 6-inch sewer lines will accommodate this increase in wastewater discharge by evenly distributing wastewater to both lines.[230] The Sunset Avenue Project's total wastewater generation will contribute less than 0.03 percent of the unutilized treatment capacity at the HTP. Also, its contribution to the delimited annual increase in wastewater to be treated at the HTP is less than 0.7 percent of the allocated 5.0 mgd. Development of this mixed-use project will not exceed existing sewage collection capacity servicing the site nor treatment capacity at the Hyperion Treatment Plant. Therefore, no adverse project impact on the City's wastewater infrastructure is expected.

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[228] *Mollenhauer Group, Metropolitan Transit Authority, Division 6 Bus Service Facility located at Jefferson Boulevard and Rodeo Road, Los Angeles – Utility Study. April 30, 2004.*

[229] *City of Los Angeles Dept. of Public Works, Bureau of Engineering. Development Services Division – Sewer Worksheet. May 6, 2004.*

[230] *Mollenhauer Group. "Sewer Availability Report" as completed by City of Los Angeles Dept. of Public Works, Bureau of Engineering an d Bureau of Sanitation. May 11, 2004.*

Table IV.K.2-1

WEST LOS ANGELES TRANSPORTATION FACILITY
EXISTING AND PROJECTED WASTEWATER GENERATION

Land Use	Building Area (sq.ft.)	Factor [a]	Total (gpd)
Existing Wastewater Generation			
Vacant Buildings		0 gpd/ksf [b]	0
Total Existing Wastewater Generation			**0**
Projected Wastewater Generation			
Bus Maintenance Facility	72,000	80 gpd/ksf [b]	5,760
Net Change			**5,760**

[a] *City of Los Angeles, Department of Public Works, Bureau of Engineering, Development Services Division – Sewer Worksheet. June 6, 1996.*
[b] *ksf = 1,000 square feet*

Source: PCR Services Corporation, May 2004.

Table IV.K.2-2

SUNSET AVENUE PROJECT
EXISTING AND PROJECTED WASTEWATER GENERATION

Land Use	Building Area	Factor [a]	Total (gpd)
Existing Wastewater Generation			
Bus Transportation Facility	15,300 sq.ft.	80 gpd/ksf [b]	1,224
Total Existing Wastewater Generation			**1,224**
Projected Wastewater Generation			
Dwelling Units	225 units	150 gpd [c]/ksf [b]	33,750
Health Club/Spa	7,000 sq.ft.	80 gpd/ksf [b]	560
Retail	2,000 sq.ft.	80 gpd/ksf [b]	160
Coffee Shop	1,000 sq.ft.	300 gpd/ksf [b]	300
TOTAL			**34,770**
Net Change			**33,546**

[a] *City of Los Angeles, Department of Public Works, Bureau of Engineering, Development Services Division – Sewer Worksheet. June 6, 1996.*
[b] *ksf = 1,000 square feet.*
[c] *One hundred fifteen percent of wastewater generation factor for a mix of one- and two-bedroom dwelling units, with two-bedroom units representing 75 percent of the mix.*

Source: PCR Services Corporation, May 2004.

Combined Impacts. The West Los Angeles Transportation Facility and the Sunset Avenue projects would result in a total annual combined wastewater generation of 39,306 gpd.

The combined project's total wastewater generation will contribute to less than 0.033 percent of the unutilized treatment capacity at the HTP's 119 mgd of available dry weather wastewater capacity. Therefore, the projects would have no impact on the City's wastewater infrastructure; thus, there would be no significant combined impacts.

3. CUMULATIVE IMPACTS

As identified in Section III.B., Related Projects, of this Draft EIR, 11 other projects in the vicinity are related to the proposed project by virtue of proximity and timing for purposes of the cumulative impact assessment. As shown on Table IV.K.2-3 on page 388, these related projects are conservatively forecasted to generate 96,037 gpd of wastewater. When combined with the proposed Transportation Facility, 101,797 gpd of wastewater would be cumulatively generated.

Similarly, 21 local projects have been identified as related projects in the vicinity of the Sunset Avenue Project. As shown in Table IV.K.2-4 on page 389, wastewater generation from these related projects is conservatively estimated to be 2,068,357 gpd. In combination with the West Los Angeles Transportation Facility, nearly 2,101,903 gpd of wastewater would be generated. As summarized in Table IV.K.2-5 on page 390, both projects and all of the respective related projects would generate a cumulative total of 2,203,700 gpd, over 68 percent of which will be associated with a single large, multi-phase, multi-year project, Playa Vista. This cumulative total represents approximately 1.9 percent of the unutilized dry weather capacity at HTP, indicating that the City's wastewater treatment capacity is more than adequate to accommodate the cumulative demand associated with the West Los Angeles Transportation Facility and Sunset Avenue Project. Also, considering that the Playa Vista project is to be implemented over a five-year period, cumulative wastewater generation would be well below the City's policy threshold of 5 mgd of increased wastewater per year.

It is anticipated that the City's wastewater collection system either has sufficient capacity to accommodate the identified related projects or that the respective projects will improve collection capacity as may be needed. Related projects' demand on the City's wastewater collection and treatment capacity will be evaluated on a project-by-project basis. Thus, no adverse cumulative wastewater impacts would result directly due to related projects identified in conjunction with the West Los Angeles Transportation Facility and the Sunset Avenue Project.

Table IV.K.2-3

WEST LOS ANGELES TRANSPORTATION FACILITY
WASTEWATER GENERATION FOR RELATED PROJECTS

No.	Proposed Use	Size	Location	Generation Rate (gpd) [a]	Generation (gpd)
1.	Apartments	8	4210 Duquesne Avenue	120 [c]	960
2.	Industrial	250,000	10100 Jefferson Blvd.	80 [b]	20,000
3.	Office	27,000	9050 Washington Blvd.	150 [b]	4,050
4.	Office/Condominiums	28	599 Jefferson Blvd.	160 [c]	4,480
5.	Office/Apartments	25,969	8601 Washington Blvd.	160 [b]	4,155
6.	Office	151,000	3505 Hayden Ave.	150 [b]	22,650
7.	Live/Work	2	8500 Washington Blvd.	180 [c]	360
8.	Live/Work	11,000	3525 Eastham Drive	160 [b]	1,760
9.	West LA College Phase I	175,000	West LA College	150 [b]	26,250
10.	Mixed Use		9300 Culver Blvd.		
	Commercial	26,400		150 [b]	3,960
	Retail	26,400		80 [b]	2,112
11.	Exposition LRT Project/LRT Jefferson Station	66,250	SEC Jefferson/La Cienega	80 [b]	5,300
				Subtotal	**96,037**
	West Los Angeles Transportation Facility	72,000	5852 Jefferson Blvd.	80 [b]	5,760
				Total	**101,797**

[a] *City of Los Angeles Department of Public Works Bureau of Engineering, Development Services Division – Sewer Worksheet, June 6, 1996.*
[b] *Per 1,000 square feet.*
[c] *Per residential unit.*

Source: Overland Traffic Consultants, Inc. April 2004

4. MITIGATION MEASURES

West Los Angeles Transportation Facility. Since the West Los Angeles Transportation Facility would not result in any significant environmental impacts upon the City's wastewater collection and treatment infrastructure, mitigation measures are not required.

Sunset Avenue Project. The increased wastewater generation attributable to the Sunset Avenue Project will not create an impact on existing wastewater collection and treatment infrastructure maintained by the City of Los Angeles. Therefore, no mitigation measures for the Sunset Avenue project are required.

Table IV.K.2-4

SUNSET AVENUE PROJECT
WASTEWATER GENERATION FOR RELATED PROJECTS

No.	Proposed Use	Size	Location	Generation Rate (gpd) [a]	Generation (gpd)
1.	Townhouses	111	SWC Washington Blvd. & Via Dolce	180 [c]	19,980
	Office	6,000		150	900
2.	Apartments	531	E/S Via Marina S/O Marquesas Way	160 [c]	84,960
	Hotel	288		120 [c]	34,560
3.	Apartments	1,201	E/S Via Marina S/O Panay Way	160 [c]	192,160
	Retail	4,000		80 [b]	320
	Commercial	6,000		150 [b]	900
4.	Apartments	100	Parcel 20 Panay Way	160 [c]	16,000
	Commercial	6,885		150 [b]	1,033
5.	Lofts	80	1046 Princeton Street	120 [c]	9,600
	Storage	8,000		20 [b]	160
6.	Apartments	300	Princeton St. and Carter Ave.	160 [c]	48,000
7.	Retail	42,270	4141 Lincoln Blvd.	80 [b]	3,382
	Restaurant	9,200		300 [b]	2,760
8.	Office	15,180	2100 Abbot Kinney Blvd.	150 [b]	2,277
9.	Gas Station	500	2005 Lincoln Blvd.	80 [b]	40
	Mini-Mart Retail	720		80 [b]	58
10.	Apartments	280	1430 Lincoln Blvd.	160 [c]	44,800
	Retail	197,000		80 [b]	15,760
11.	Condominiums	35	S/O 615 Hampton Dr.	180 [c]	6,300
12.	Art lofts	51	615 Hampton Dr.	120 [c]	6,120
13.	Condominiums	24	212 Marine St.	180 [c]	4,320
	Retail	9,000		80 [b]	720
14.	Apartments	44	2209 Main St.	160 [c]	7,040
15.	Apartments	26	2021-29 Main St.	160 [c]	4,160
	Retail	6,553		80 [b]	524
16.	Apartments	107	2012-24 Main St.	160 [c]	17,120
	Retail	11,549		80 [b]	924
17.	Condominiums	9	125 Pacific St.	180 [c]	1,620
18.	Garage	110,625	1685 Main St.	80 [b]	8,850
	Retail	12,500		80 [b]	1,000
19.	RAND Headquarters	13,900	1700 Main St.	150 [b]	2,085
20.	Playa Vista	Phase 1	Jefferson Blvd. & Lincoln Blvd.	[d]	1,059000
		Phase 2		[d]	457,000
21	Condominiums	70		180 [c]	12,600
	Restaurant	3,953		300 [b]	1,186
	Bakery/Retail	1,726		80 [b]	138
				Subtotal	**2,068,357**
	Sunset Avenue Project	3.13 acres	100 Sunset Ave.		33,546
				Total	**2,101,903**

[a] *City of Los Angeles Department of Public Works Bureau of Engineering, Development Services Division – Sewer Worksheet, June 6, 1996.*
[b] *Per 1,000 square feet.*
[c] *Per residential unit.*
[d] *Based on Playa Vista Draft EIRs: First Phase, September, 1992; Second Phase, August 2003.*

Table IV.K.2-5

WEST LOS ANGELES TRANSPORTATION FACILITY AND SUNSET AVENUE PROJECT TOTAL WASTEWATER GENERATION FOR RELATED PROJECTS

No.	Proposed Use West Los Angeles Transportation Facility	Generation (gpd)
1.	Related Project	96,037
2.	West Los Angeles Transportation Facility	5,760
	Subtotal	**101,797**

No.	Proposed Use Sunset Avenue Project	Generation (gpd)
1.	Related Projects	2,068,357
2.	Sunset Avenue Project	33,546
	Subtotal	**2,101,903**
	Overall Total	**2,203,700**

Source: PCR Services Corporation May 2004.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

West Los Angeles Transportation Facility and Sunset Avenue Project. No significant impacts to the City's wastewater collection and treatment infrastructure would occur as a result of the West Los Angles Transportation Facility project or the Sunset Avenue Project.

V. Alternatives to the Proposed Project

V. ALTERNATIVES TO THE PROPOSED PROJECT
A. INTRODUCTION

1. SUMMARY OF THE ALTERNATIVES

Under CEQA, the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process. Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, the purpose of an environmental impact report is to identify alternatives to the project.

Direction regarding the definition of project alternatives is provided in CEQA Guidelines Section 15126.6(a) as follows:

> "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[231] The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[232]

In selecting project alternatives for analysis, potential alternatives should be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations,

[231] *CEQA Guidelines Section 15126.6(b).*

[232] *CEQA Guidelines Section 15126.6(f).*

jurisdictional boundaries,… and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site . . . ."

CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.[233]

The Transportation Facility project would not result in significant impacts; and, therefore, alternatives to the project would not need to be identified to reduce such impacts. At the Sunset Avenue site, implementation of the proposed project would result in potentially significant impacts associated with aesthetic character as defined by a threshold of significance addressing the potential for a project to detract from the existing style or image of the area due to density, height, bulk, or setbacks; a short-term significant air quality impact associated with NOx emissions during construction; and a short-term significant noise impact during construction. In addition, there would be a short term significant impact associated with composite mass daily emissions during the overlapping time of Transportation Facility operations and Sunset Avenue Project construction. Based on these potentially significant environmental impacts and the objectives established for the project (refer to Section II, Project Description, Subsection B., Statement of Project Objectives, in this EIR), as well as consideration of the General Plan Designations and zoning applicable to the project site, the following alternatives to the proposed Transportation Facility and Sunset Avenue projects were evaluated:

West Los Angeles Transportation Facility

- Alternative A: No Project/No Build
- Alternative B: No Project/Community Plan
- Alternative C: Reduced Project
- Alternative D: Alternative Location

Sunset Avenue Project

- Alternative E: No Project/No Build
- Alternative F: Alternative Land Use

[233] *CEQA Guidelines Section 15126.6(e)(2).*

- Alternative G: Reduced Density
- Alternative H: Reduced Height

Selection of alternatives responds to the unique situation of the two projects and two development sites. Four alternatives were selected for each site, each of which includes a No Project/No Build alternative. The No Project/No Build alternatives assume that the two sites would continue their current uses and conditions. Two of the alternatives, one for each site, were based on alternative land uses reasonably expected to occur in the foreseeable future if the proposed project were not implemented. At the Transportation Facility site, the reasonably foreseeable development is primarily dictated by the land use that would be permitted by right in the existing zoning and would be accommodated by the size of the parcel and surrounding infrastructure. For the Sunset Avenue site, the Alternative Use alternative was based on General Plan Framework commercial land use designations in the site vicinity and commercial development trends in the area. Although a reasonable Alternative use alternative would have been a mixed residential/commercial use, an all-commercial use was selected since it was different from the project and could be contrasted with the project's impacts.

Reduced project alternatives for both development sites were selected on the basis of their representing the same land use as the project, but at reduced density or intensity. For the Transportation Facility site, a reduction from 175 to 150 buses was selected since this number is a minimum beyond which the project would not be able to function as proposed. For the Sunset Avenue site, the reduction from 225 to 171 units was selected as the reduced density alternative, since it represented the base number of units that would be allowed without affordable housing density bonuses. The floor area for the Sunset Avenue Reduced Density alternative was also constrained to represent an approximation of the 1.5:1 floor area limitations attributed to non-residential uses under the governing land use plans in the Venice Community.

The fourth alternative selected for the Transportation Facility project was an alternative location alternative. This alternative would be considered appropriate in relation to a public facility with a broad service area, since any suitable alternative location within the service area would meet the basic objectives of the applicant. A height reduction alternative was selected as the fourth alternative for the Sunset Avenue site since it specifically addressed an identified significant impact. No alternative location was considered for the Sunset Avenue project since the applicant is committed to a specific development opportunity that is associated with the Sunset Avenue site only. As such, the selection of an alternative location for the proposed mixed-use project would be considered inappropriate and infeasible.

2. ANALYSIS FORMAT

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description would be substantially attained by the alternative.[234] The evaluation of each of the Alternatives follows the process described below:

a. The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in the EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the project are compared for each environmental issue area. Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more adverse or less beneficial than the project, the comparative impact is said to be "greater." Where the impacts of the alternative and project would be roughly equivalent, the comparative impact is said to be "similar."

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are substantially attained by the alternative.

Table V-1 on page 395 provides a summary matrix that compares the impacts associated with the proposed projects to those of the alternatives selected for analysis.

[234] *CEQA Guidelines Section 15126.6(c).*

Table V-1

COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND IMPACTS OF THE PROPOSED PROJECT

	Proposed Projects	West Los Angeles Transportation Facility				Sunset Avenue Project			
	Project Impact	Alternative A: No Project/No Build	Alternative B: No Project/Community Plan	Alternative C: Reduced Project	Alternative D: Alternative Location [a]	Alternative E: No Project/No Build	Alternative F: Alternative Use/Commercial	Alternative G: Reduced Density	Alternative H: Reduced Height
Aesthetics									
Aesthetic Character	Less than Significant (Transportation Facility) Significant (Sunset Avenue)	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Significant)	Potentially not Necessarily Less (Potentially Less than Significant)	Less (Removes Impact)
Views	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Illumination	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Potentially Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Shading	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Potentially Less (Less than Significant)	Less (Less than Significant)
Air Quality	Less than Significant (Operations) Less than Significant (Construction Phase – Transportation Facility) Significant(Construction Phase Sunset Avenue)	Less (No Impact)	Similar (Less than Significant)	Greater (with shuttling) (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Significant during Construction)	Less (Significant during Construction)	Less (Significant during Construction)
Historic Resources	Less than Significant (Transportation Facility) Less than Significant (Sunset Avenue)	Less (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Geology/Seismic Hazard	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant) (Does not remove hazard)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Hazardous Materials	Less than Significant with Mitigation	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Greater (Impact source not removed)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Water Quality	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Land Use									
Regulatory Framework	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Relationship to Surrounding Uses	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Noise	Less than Significant (Transportation Facility) Significant & Unavoidable (Sunset Construction Phase)	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Significant during Construction)	Similar (Significant during Construction)	Less (Significant during Construction)

Table V-1 (Continued)

COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND IMPACTS OF THE PROPOSED PROJECT

	Proposed Projects	West Los Angeles Transportation Facility				Sunset Avenue Project			
	Project Impact	Alternative A: No Project/No Build	Alternative B: No Project/Community Plan	Alternative C: Reduced Project	Alternative D: Alternative Location [a]	Alternative E: No Project/No Build	Alternative F: Alternative Use/Commercial	Alternative G: Reduced Density	Alternative H: Reduced Height
Transportation	Construction: Less than Significant Operation: Less than Significant (Transportation Facility) Construction: Less than Significant with Mitigation Operation: Less than Significant with Mitigation (Sunset Avenue Project)	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Greater (Potentially Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Parking	Construction: Less than Significant Operation: Less than Significant (Transportation Facility) Construction: Less than Significant with Mitigation Operation: Less than Significant/Net Beneficial (Sunset Avenue Project)	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Utilities									
Water	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant
Wastewater	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant

[a] *It is anticipated that a Transportation Facility alternative site would be equivalent to the Project in land use designation and setting and would, therefore, have the same impacts.*

Source: PCR Service Company, May 2004.

V. ALTERNATIVES TO THE PROPOSED PROJECT
B. ALTERNATIVE A:
WEST LOS ANGELES TRANSPORTATION FACILITY SITE
NO PROJECT/NO BUILD ALTERNATIVE

1. DESCRIPTION OF THE ALTERNATIVE

CEQA Guidelines, Section 15126.6(e)(2) requires the evaluation of a No Project alternative, which discusses the continuation of existing conditions at the time the Notice of Preparation for the EIR is published. The continuation of the existing condition of a site is considered a No Project/No Build alternative. The intent of the Guidelines to determine if leaving a site in its current state would avoid or reduce environmental impacts associated with development. In accordance with the CEQA Guidelines, the No Project/No Build alternative assumes that the development of the West Los Angeles Transportation Facility would not be constructed and that the Jefferson Boulevard site would continue in its current condition. Under this scenario, the property would remain in its vacant condition. Existing structures are currently non-usable, so resumption of any industrial activity would not be anticipated. No development or alterations to the property would take place. This alternative was selected for evaluation as a requirement of the CEQA Guidelines.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics

Visual Character. Under the No Project/No Build alternative, no changes in the visual character of the Jefferson Boulevard site would occur. The property would remain vacant and visually degraded. The Aesthetics evaluation of the project (Section IV.A of this EIR) determined that the project would enhance the existing appearance of the site and would be consistent with surrounding uses. A decorative wall, with a minimum height of eight feet, and landscaping would soften the project appearance, and minimize street views of the on-site buses, and activities. Since the project site is currently in a degraded condition, this alternative would have less environmental benefit in relation to aesthetic character than the project, which would have an upgraded and more formal appearance in relation to the No Project/No Build alternative. Neither the proposed project nor the alternative would exceed thresholds of significance relative to aesthetic character and both would be less than significant.

Views. No valued viewsheds exist in association with the project site and no impacts on views would occur from either the No Project/No Build alternative or the project. Neither alternative would exceed thresholds of significance relative to views and both would be deemed less than significant.

Illumination. The No Project/No Build alternative would generate no new sources of light and glare. Since no environmental effects associated with light and glare would be generated by the No Project/No Build alternative, light and glare impacts would be less than under the project. The project would install on-site lighting in accordance with city code and lighting within the property boundary would be directed on-site. No adjacent sensitive receptors would be impacted by the project's light and glare and the project would not exceed light and glare significance thresholds. Although implementation of the No Project/No Build alternative would reduce the project's light and glare impacts, both alternatives would be less than significant in relation to light and glare.

Shading. The No Project/No Build alternative would generate no shading impacts. Shading impacts of the proposed project are negligible and would not affect any sensitive receptors. Neither the proposed project nor the alternative would exceed thresholds of significance relative to shading and both would be less than significant.

b. Air Quality

The No Project/No Build alternative would not generate the construction- or operations-period air pollutant emissions that would occur with the project. Air quality impacts under this alternative would not occur. As such, under the No Project/No Build alternative, the following less-than-significant impacts to air quality would also be avoided: (1) mass regional ROC, CO, NO_X, SO_X, and PM_{10} emissions during construction; (2) localized CO, NO_X, and PM_{10} concentrations during construction; (3) localized CO, NO_X, and PM_{10} concentrations during long-term operations; and (4) long-term air pollutant contributions to localized and regional cumulative impacts. And finally, the beneficial effect related to the net reduction in long-term ROC, NO_X, and CO mass regional emissions that would occur under the project, would not occur.

c. Historic Resources

This site does not contain historic resources and this topic was not evaluated for the Transportation Facility Project.

d. Geology/Seismic Hazards

The project site is located within the delineated Alquist-Priolo Fault Hazard Zone, although no Holocene (active) faulting within or adjacent to the property has been subsequently observed during geologic investigation. Although the site has been determined not to have fault ruptures, the development of the project at this site would still be subject to seismically induced ground shaking. New development would be required to adhere to UBC foundation design parameters. Compliance with site preparation guidelines outlined in the geotechnical study would reduce the potential for the project to expose people to risk of injury, or result in substantial structural or infrastructure damage to less-than-significant levels. Under the No Project/No Build alternative, however, no new construction would occur. Although existing derelict structures may not comply with seismic structural standards, these structures are unusable and are not expected to present a geologic hazard. Neither alternative would exceed thresholds of significance relative to geologic and seismic safety.

e. Hazardous Materials

Contamination of on-site soils associated with acetone, Total Recoverable Petroleum Hydrocarbon (TRPHs) and total volatile petroleum hydrocarbons (TVPHs), and fuel oxygenates, and minor contamination of groundwater associated with TVPHs and aromatic gasoline compounds have been discovered within the project site. According to the consulting environmental engineer, although the source of the TVPHs and aromatic gasoline components is unknown, it does not appear to pose a significant environmental threat at the project site.[235] Based on the results of the site's exploration and laboratory analyses, the consulting engineer has concluded that shallow soil impact by TRPH appears to be limited in lateral and vertical extent and can be removed or treated on-site. Low detections of acetone in soil samples do not require further investigation as existing constituents will naturally degrade. Low isolated areas of soil and groundwater detections of TVPH, aromatic hydrocarbons, and fuel oxygenates, in the general area of the sewer line, have been determined to not be originating from this sewer infrastructure. These isolated detections are associated with unknown sources. The low concentrations of TVPH, aromatic hydrocarbons, and fuel oxygenates in the soil or groundwater do not pose a significant risk to human health or the environment and do not warrant further assessment or remediation.[236] The development of the project would provide opportunity for treatment of low levels of TRPHs, thus resulting in a beneficial impact. Under the No Project/No Build alternative, such soil treatment, would be unlikely. As such, the No Project/No

[235] *Environmental Support Technologies, Inc., Phase I Environmental Site Assessment Addendum, October 30, 2003.*

[236] *Ibid.*

Build alternative would have a greater impact relative to hazardous materials. However neither alternative would exceed hazardous materials thresholds of significance.

f. Water Quality

The No Project/No Build alternative would not change the existing condition of the property. As such, the potential for water quality impacts from construction or operation of the proposed transportation facility would not occur. However, contaminated soils are known to exist on the project site. Without treatment associated with the project, potential migration of hazardous materials could occur. In relation to water quality, the No Project/No Build alternative would have greater impacts than the project, since the proposed project's potential water quality impacts associated with construction and operation would be reduced to less than significance with the implementation of state and local water quality regulations and BMPs. Neither alternative, however, would exceed thresholds of significance in relation to surface groundwater water quality.

g. Land Use

The No Project/No Build alternative anticipates the continuation of the existing vacant condition of the Jefferson Boulevard site. Policies of the Regional Comprehensive Plan and Guide (RCPG) support public transportation and infrastructure, and the conversion of existing vehicles to clean fuel/alternative fuel. The City's General Plan Framework policies encourage improved public transportation services and means by which the effectiveness of transportation services can be improved. Objectives of the West Adams-Baldwin Hills-Leimert Community Plan, relative to industrial land use, encourage the retention of existing industrial designated areas and employment opportunities supported by industrial uses The evaluation of the project's land use impacts (Section IV.G of this EIR) determined that the project conformed to the plans and policies that are applicable to the project site. As such, the project's land use impacts relative to governing plans and policies would be less than significant. By contrast, the vacant parcel would not support the ongoing use of the industrial parcel, employment opportunities, or transportation goals of the General Plan Framework and RCPG, and would have a greater impact relative to land use plans and policies than the project.

The EIR Land Use analysis also determined that, since the project would include light industrial uses, typical of the area, and would be buffered from surrounding residential land uses by existing intervening light-industrial and/or commercial uses, and would be an infill project on an existing site, it would not disrupt, divide, or isolate any existing neighborhoods, communities, or land uses. By comparison, the vacant site would also not disrupt existing neighborhoods since it generates no activity of any kind. Neither alternative would exceed the threshold of significance relative to neighborhood disruption.

h. Noise

The No Project/No Build alternative would not result in changes to local noise conditions occurring on or adjacent to the project site associated with short-term construction or long-term operations activities. Therefore, this alternative would avoid the project's less-than-significant impacts related to the following: (1) noise from short-term construction activities; and (2) noise from long-term operations activities such as employee and transit bus trips, and on-site activities such as bus idling, backup alarm beeps, bus wash operations, and air compressor machine operations. This alternative would also avoid the project's contribution to the less-than-significant cumulative noise impact.

i. Transportation and Circulation

Under the No Project/No Build alternative, no construction or construction traffic impacts would occur. Although implementation of the No Project/No Build alternative would reduce the project's transportation impacts, project impacts would be less than significant with the implementation of recommended mitigation measures and no further reduction would be required.

j. Parking

Under the No Project/No Build alternative, no development of the project site would occur. The No Project/No Build alternative would not require parking or result in any parking impacts. Neither the No Project/No Build alternative, nor the project, would exceed thresholds of significance relative to parking.

k. Utilities

(1) Water

The No Project/No Build alternative would not change the existing use of the vacant project site. Since the existing vacant property has no current water demand, this alternative would result in no new water demand and would have no effect on water supply and infrastructure. By comparison the project is expected to generate a net increase in water demand of approximately 6,624 gallons per day (gpd). Although implementation of the No Project/No Build alternative would reduce the project's water demand, neither the No Project/Alternative Use alternative, nor the proposed project, would exceed thresholds of significance relative to the City of Los Angeles water supplies and water distribution capacity, after appropriate infrastructure improvements have been installed. As such, impacts related to water supply would be less than significant under both alternatives.

(2) Wastewater

The No Project/No Build alternative would not change the existing use of the vacant project site. No sewage generation is anticipated and, as such, this alternative would have less impact relative to wastewater treatment, than under the project. As described in Section IV.K, of this EIR, the project would generate approximately 5,760 gallons per day (gpd) of wastewater. The project's estimated water demand would not exceed thresholds of significance relative to the City of Los Angeles wastewater collection and treatment infrastructure. Although the No Project/No Build alternative would generate no wastewater, neither alternative would exceed wastewater thresholds of significance. Both alternatives would be less than significant in relation to wastewater collection and treatment.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The No Project/No Build Alternative would not meet the primary objectives of the project to provide a modern facility and to expand service from a more centralized location in response to growing Westside and Central ridership. Under the No Project/No Build alternative, Metro would need to initiate a new search for another site, which would meet the criteria for a district-wide transportation center. Since the proposed development of the project site is the culmination of over 20 years of unsuccessful attempts to acquire an appropriate site for the construction of the new Westside Transportation Facility, the implementation of No Project/No Build alternative would possibly delay the project's objectives by several years.

Short-term and long-term objectives, which would also be delayed include Metro's ability to increase bus operating facility capacity system-wide, and to relieve overcrowding at Metro's divisions serving the Westside and Central areas, and to provide facilities capable of maintaining and operating alternative fuel vehicles. With delay caused by the re-initiation of a search for another development site, the project's objectives to improve transit service in all Westside and Central communities, reduce pressures at other already overburdened facilities, and reduce the need to operate Westside routes out of other sectors would be impeded. The project's objective to make the Westside and Central sector more responsive to routing, scheduling, and refueling service requests would not be met.

Since the project site meets the criteria to accommodate a larger facility within an industrial zone, it would be appropriate for the installation of CNG fueling infrastructure. The non-availability of this site under the No Project/No Build alternative would likely delay Metro's conversion to a 100 percent CNG fleet (new clean-fuel buses replacing older diesel buses), since the cost in time and mileage to shuttle buses to offsite locations for re-fueling would be a disincentive for conversion.

Finally, the loss of this site to a No Project/No Build alternative would also impede the project's objective to improve the efficiency of the transportation service delivery through state of the art facilities that reduce operating costs. Delay would also impede the objective of the project to improve the efficiency of transportation service delivery from a more centralized facility within which buses would be close to their routes, thereby reducing "deadhead"/non-revenue costs. Operating costs would increase due to buses needing to travel from further locations (e.g., San Fernando and San Gabriel Valleys) to meet increasing demands for transit in the Westside and Central areas.

V. ALTERNATIVES TO THE PROPOSED PROJECT
C. ALTERNATIVE B:
WEST LOS ANGELES TRANSPORTATION FACILITY SITE
NO PROJECT/COMMUNITY PLAN

1. DESCRIPTION OF THE ALTERNATIVE

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative may discuss "predictable actions by others, such as some other project if disapproval of the project under consideration were to occur." CEQA Guidelines, Section 15126.6(e)(2) further states that the No Project Alternative should project what would be reasonably expected to occur in the foreseeable future, if the project were not approved, based on current plans and consistent with available infrastructure and community services. For the purpose of this evaluation, this is considered a No Project/Community Plan Compliant alternative. If the Transportation Facility project were not developed, the project site would remain available for future development. A reasonably foreseeable project would likely be in keeping with the nature of surrounding uses and the governing land use plans, policies, and zoning designation. The site is located within a light industrial/manufacturing district with a range of uses such as warehousing and small-scale manufacturing. The community plan designation is industrial and the zoning is MR-1-1VL, a restricted light industrial use. As such, reasonably foreseeable development would be a light industrial use consisting of an industrial park with a mix of uses such as manufacturing, warehousing, and services.

This use would be consistent with the existing zoning and would be permitted by right. Within the MR zoning, a floor area ratio (FAR) of 0.6:1 (0.6 square foot of floor area per 1.0 square foot of land area) is typical of industrial park development and is anticipated under the No Project/Community Plan alternative scenario. For the 4.66-acre site (approximately 202,990 square feet), the 0.6:1 FAR would result in the development of approximately 121,800 square feet of light industrial/manufacturing floor area. This alternative was selected for analysis because it represents the No Project (reasonably foreseeable land use) analysis required by CEQA Guidelines, is based on existing infrastructure and the governing land use designation, and would provide a contrasting use to which the proposed project's impacts can be compared.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics

Visual Character. Under the No Project/Community Plan alternative, the project site would be developed with a modern industrial park. As this alternative would be built pursuant to the City Zoning regulations, it may have a larger setback than the proposed project. At the same time the alternative would have considerably more building mass (0.6:1 FAR versus the proposed project's 0.35:1), and could include taller buildings, and/or buildings closer to Jefferson Boulevard than the proposed project. Both the No Project/Community Plan alternative and the project would have an upgraded and more formal appearance in relation to existing conditions of the site. Both alternatives would involve the construction of modern structures; loading areas and other industrial uses would be primarily screened from public view. Relative to aesthetic character, the impacts of the No Project/Community Plan alternative and the project would be similar. Impacts of both would be less than significant.

Views. No valued viewsheds exist in association with the project site and no impacts on views would occur from either the No Project/Community Plan alternative or the project. Neither alternative would exceed visual quality thresholds of significance and both would be deemed less than significant relative to views and scenic resources.

Illumination. As with the project, the No Project/Community Plan alternative would generate new sources of light and glare. Lighting would be installed in accordance with city code and directed on-site. No adjacent sensitive receptors have been identified and no light and glare impacts are anticipated. The No Project/Community Plan alternative and the project would not exceed light and glare impact thresholds and no significant impacts would occur under either alternative.

Shading. The No Project/Community Plan alternative would generate greater shading impacts than the proposed project. Shading impacts would be negligible and would not affect any sensitive receptors. Neither the proposed project nor the alternative would exceed thresholds of significance relative to shading and both would be less than significant.

b. Air Quality

The No Project/Community Plan alternative would result in the development of the project site with a 121,800 square foot light industrial use, which would be a more intensive development than the facility proposed under the project (approximately 72,000 square feet, including auxiliary facilities). During construction, the No Project/Community Plan alternative would require similar amounts of site grading and excavation, but as a result of the 152 percent

increase in building square footage (i.e., 73,512 square feet), a corresponding increase in construction activities would be required. On days of intensive construction activities, both the number of construction workers and heavy-duty construction equipment would be similar to the project. Regional mass daily emissions under the No Project/Community Plan alternative would be similar to project emissions, because the duration (i.e., number of days) and not the intensity of construction activities would be increased. As a result, impacts relative to ROC, CO, NO_X, PM_{10}, and SO_X mass emissions, as well as localized CO, NO_X, and PM_{10} concentrations during construction would be less than significant.

The No Project/Community Plan alternative would also generate mobile- and stationary-source regional mass emissions during the long-term operations period. Although the change in development would actually reduce trip generation from 1,247 to 848 daily trips, this development alternative would result in a net increase in long-term mass regional criteria pollutant emissions because (1) all trips would be net new trips, rather than redistributed trips that would occur under the project, and (2) there would be no net reduction in transit bus non-revenue VMT, and related air pollutant emissions, that would occur under the project. Nevertheless, pollutant emissions would not exceed SCAQMD daily significance thresholds and impacts relative to mass regional emissions would be less than significant.

The decrease in traffic by 399 daily trip ends associated with the No Project/Community Plan alternative would contribute to a proportionate decrease in localized CO emissions. The reduced localized mobile source CO emissions associated with this alternative, as with the project, would result in a less-than-significant impact. Also similar to the project, impacts relative to localized NO_X and PM_{10} concentrations and long-term contributions to localized and regional cumulative impacts during the long-term operations period would be less than significant.

c. Historic Resources

This site does not contain historic resources and this topic was not evaluated for the Transportation Facility Project.

d. Geology/Seismic Hazards

The project site is located within the delineated Alquist-Priolo Fault Hazard Zone, although no Holocene (active) faulting within or adjacent to the property has been subsequently observed during geologic investigation. Although the site has been determined not to have fault ruptures, the development at this site would still be subject to seismically-induced ground shaking. New development would be required to adhere to UBC foundation design parameters. Compliance with site preparation guidelines outlined in the geotechnical study would reduce the

potential for the project to expose people to risk of injury, or result in substantial structural or infrastructure damage to less-than-significant levels. Since the No Project/Community Plan alternative would be subject to the same geologic impacts, structural design requirements, and site mitigation as the project, both alternatives would have the same level of risk. Neither alternative, however, would exceed thresholds of significance related to geological hazard and seismic risk.

e. Hazardous Materials

Contamination of on-site soils associated with acetone, Total Recoverable Petroleum Hydrocarbon (TRPHs) and total volatile petroleum hydrocarbons (TVPHs), and fuel oxygenates, and minor contamination of groundwater associated with TVPHs and aromatic gasoline compounds have been discovered within the project site. According to the consulting environmental engineer, although the source of the TVPHs and aromatic gasoline components is unknown, it does not appear to pose a significant environmental threat at the project site.[237] Based on the results of the site's exploration and laboratory analyses, the consulting engineer has concluded that shallow soil impact by TRPH appears to be limited in lateral and vertical extent and can be removed or treated on-site. Low detections of acetone in soil samples do not require further investigation as existing constituents will naturally degrade. Low isolated areas of soil and groundwater detections of TVPH, aromatic hydrocarbons, and fuel oxygenates, in the general area of the sewer line, have been determined to not be originating from this sewer infrastructure. These isolated detections are associated with unknown sources.[238] The low concentrations of TVPH, aromatic hydrocarbons, and fuel oxygenates in the soil or groundwater do not pose a significant risk to human health or the environment and do not warrant further assessment or remediation.[239] The development of the project under both the project and the No Project/Community Plan alternative would provide opportunity for treatment. As such, the No Build/Community Plan alternative and the project would have the same impact relative to hazardous materials, although neither alternative would exceed hazardous materials thresholds of significance.

f. Water Quality

Construction activities associated with the project have the potential to expose soils to potential erosion or transportation via storm water into nearby storm drains and to expose storm

[237] *Environmental Support Technologies, Inc., Phase I Environmental Site Assessment Addendum, October 30, 2003.*

[238] *Environmental Support Technologies, Inc., Soil Assessments – Sewer Line/Sewer Vent, June 2, 2004.*

[239] *Ibid*

water pollution to from construction materials. Implementation of Best Management Practices (BMP) as required by the National Pollutant Discharge Elimination System (NPDES) Construction Permit and an approved Storm Water Pollution Prevention Program (SWPPP) would reduce the potential for construction materials and soils exposed during the grading and construction process from being transported offsite and into nearby storm water drainage infrastructure. As with the project, light manufacturing and other industrial uses could include underground storage tanks, however, no groundwater contamination is anticipated from the installation of modern, monitored Underground Storage Tanks (USTs). During the operational phase of the No Project/Community Plan alternative, the potential for the generation of sources of pollution would be less than under the project since vehicle maintenance, including rinsing of buses, would be less than under the project. With the implementation of existing regulations, neither alternative is expected to exceed water quality standards. Neither alternative would exceed water quality thresholds of significance.

g. Land Use

The policies of the Regional Comprehensive Plan and Guide (RCPG) support public transportation and infrastructure, and the conversion of existing vehicles to clean fuel/alternative fuel. The City's General Plan Framework policies encourage improved public transportation services and means by which the effectiveness of transportation services can be improved. Objectives of the West Adams-Baldwin Hills-Leimert Community Plan relative to land use provide for the retention of existing industrial designated areas and employment opportunities supported by industrial uses. The No Project/Community Plan alternative would have a less-than-significant impact relative to the Community Plan policies. Also, this alternative would comply with the existing light industrial MR1 zone. Both projects, however, would be industrial in function and support employment, as required by the Community Plan. The No Project/Community Plan alternative, however, would not support the transportation goals of the RCPG and General Plan Framework, and would have a greater impact relative to land use plans and policies, than the project. Neither alternative, however, would exceed the thresholds of significance relative to applicable plans and policies.

The No Project/Community Plan alternative would also be similar to the Project in that it would be a light industrial land use buffered from surrounding residential land uses by existing intervening light-industrial and/or commercial uses and would not be expected to disrupt, divide, or isolate any existing neighborhoods, communities, or land uses. Neither the No Project/Community Plan alternative, nor the project would exceed thresholds of significance relative to neighborhood and community disruption, division, or isolation.

h. Noise

The No Project/Community Plan alternative would require similar amounts of site grading activity, but as a result of the 177 percent increase in building square footage (i.e., 77,800 square feet) a corresponding increase in construction activities would be required. On days of intensive construction activities, both the number of construction workers and heavy-duty construction equipment would be similar as the project. Therefore, the maximum noise level from this alternative would be similar to the project, but the duration of construction noise would be increased. As with the project as proposed, the No Project/Community Plan alternative would generate noise levels during construction that are well above the surrounding ambient levels, but impacts would be less than significant.

The No Project/Community Plan alternative would generate mobile-source and on-site/ stationary-source noise impacts, similar to the project. Noise from trash compaction devices, loading dock activities, truck idling, etc., would occur on-site instead of noise from bus idling, bus wash operations, air compressor machine operations, etc. that would occur on-site under the project. Nevertheless, similar to the project, noise attributable to on-site/stationary-noise would be less than significant. The decrease in traffic by 399 daily trip ends associated with the No Project/Community Plan alternative would result in a proportionate decrease in traffic related noise levels on surrounding roadways. Therefore, roadway noise impacts associated with this alternative, as with the project, would be less than significant. This alternative also would contribute to a less-than-significant cumulative impact to noise, similar to the project.

i. Transportation and Circulation

Short-term traffic impacts would occur during the construction phase for both the No Project/Community Plan alternative and the project, due to construction traffic and street widening. The duration of construction activities under the No Project/Community Plan alternative would be incrementally longer than under the project, due to the greater floor area associated with the alternative. Less public roadwork is anticipated, however, since the No Project/Community Plan alternative would not require the widening of the south side of Jefferson Boulevard at the Jefferson/La Cienega intersection to facilitate bus right-turns, as under the project. As required by the city, traffic control procedures would be implemented for any activity that would potentially interfere with through access, including pavement construction and haul trucks/equipment turning onto or from the public street under both alternatives. Short-term construction impacts would be similar under both alternatives, although neither the project nor the alternative is considered significant.

A business park with a floor area ratio (FAR) of 0.60:1 FAR (0.6 square foot of floor area per 1.0 square foot of land), as described for the No Project/Community Plan alternative, would

generate approximately 848 actual trips per day, including 100 morning peak-hour trips and 105 afternoon peak-hour trips.[240] These estimates do not account for heavy vehicles, such as delivery trucks, which would adjust the daily and peak-hour trips upward.

As described in the traffic analysis in Section IV.I, of this EIR, the project would generate approximately 1,247 actual trips per day, including approximately 79 morning peak-hour trips and 67 afternoon peak-hour trips. Of this total, bus trips would account for approximately 419 daily trips, including 28 morning peak-hour trips and 36 afternoon peak-hour trips. With adjustment for buses,[241] the project would generate 1,666 trips per day, including 107 morning peak-hour trips and 103 afternoon peak-hour trips. Of this total, buses would account for approximately 838 daily trips, including 56 morning peak-hour trips and 72 afternoon peak-hour trips. Under LADOT requirements, the determination of street capacity is based on peak-hour trips. Unadjusted (actual) peak-hour trips would be less under the project than under the No Project/Community Plan alternative.

The project's adjusted peak-hour trips would be similar to the unadjusted peak-hours trips of the No Project/Community Plan alternative, in that the project would generate 107 morning peak-hour trips, compared to the alternative's 100 trips; and the project would generate 103 afternoon peak-hour trips, compared with the No Project/Community Plan alternative's 105 afternoon trips. With adjustment for delivery trucks, the No Project/Community Plan alternative would have slightly higher peak-hour trips than under the project. Since peak-hour trips under both alternatives would be similar, neither alternative would exceed thresholds of significance relative to congestion and intersection capacity.

j. Parking

The No Project/Community Plan alternative would be required to provide parking in accordance with LAMC requirements. These requirements represent the needs of typical light-industrial projects and would likely meet site needs. Additional parking could be required for an atypical use. As with the project, no potentially significant parking impacts are anticipated.

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[240] *Trip-generation factors for the industrial park are 6.96 trip per day /1,000 square feet of floor area; 0.82 trip per A.M. peak hour /1,000 square feet of floor area; and 0.86 trip per P.M. peak hour /1,000 square feet of floor area (ITE Manual, Trip Generation 6th Edition, 1997).*

[241] *The traffic volume assessment for the project used an adjustment factor to account for the effect of buses or heavy vehicles on the capacity of the streets and intersections. Heavy vehicles are those with more than four tires touching pavement. Adjustments for heavy vehicles are necessary to account for the additional space occupied by these vehicles and for the difference in operating capabilities compared to passenger cars. To account for these effects, each bus is converted to an equivalent of 2.0 passenger cars (PCE).*

k. Utilities

(1) Water

The No Project/Community Plan alternative would result in the construction of approximately 121,800 square feet of industrial park floor area. Since the existing vacant property has no existing water demand, this development is expected to generate a net increase in wastewater generation of approximately 11,206 gallons per day (gpd).[242] This water demand would exceed the project's estimated water demand of 6,624 gpd. Although neither the No Project/Community Plan alternative, nor the proposed project, would exceed thresholds of significance relative to the City's water supplies and water distribution capacity, after appropriate infrastructure improvements have been installed, the No Project/Community Plan alternative would have an incrementally larger demand than estimated for the project. However, since neither the No Project/Community Plan alternative, nor the proposed project, would exceed thresholds of significance relative to the City's water supplies and water distribution capacity, both alternatives would be less than significant in relation to water supply.

(2) Wastewater

The No Project/Community Plan alternative would result in the construction of approximately 121,800 square feet of industrial park floor area. Since the existing vacant property generates no wastewater, this development is expected to generate a net increase in wastewater generation of approximately 9,744 gallons per day (gpd). [243] This wastewater generation would exceed the project's estimated wastewater generation of 5,760 gpd. The No Project/Community Plan alternative would have an incrementally larger generation of wastewater than estimated for the project. However, since neither the No Project/Community Plan alternative, nor the proposed project, would exceed thresholds of significance relative to the city's wastewater collection and treatment infrastructure, both alternatives would be less than significant in relation to wastewater generation.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The No Project/Community Plan alternative would involve the construction of an approximate 121,800-square-foot industrial park, including light manufacturing, warehousing,

[242] *Consumption is estimated to be 92 gpd/1,000 square feet of floor area, similar to industrial uses cited in Section IV of this EIR (92 gpd x 121,800/1,000=11,206 gpd).*

[243] *Wastewater generation is estimated to be 80 gpd/1,000 square feet of floor area, similar to industrial uses cited in Section IV of this EIR (80 gpd x 121,800/1,000=9,744 gpd).*

and services consistent with the existing MR-1-1VL zone. It is expected that buildings would be single-story and comprise approximately 60 percent of the project site land area.

The development of the site under this scenario would prevent the development of the Westside Transportation Facility in this location and, as such, the No Project/Community Plan alternative would not meet the primary objectives of the project to provide a modern facility that would enhance bus maintenance, servicing and hours of operation. Without the use of the project site, the objective of the project to expand service from a more centralized location in response to growing Westside and Central ridership would not be realized. Under the No Project/Community Plan alternative, Metro would need to initiate a new search for another site, which would meet the criteria for a district-wide transportation center. Since the search for the project site is the culmination of several years of unsuccessful attempts to acquire another site, the implementation of the No Project/Community Plan alternative would possibly delay the project's objectives by several years.

Short-term and long-term objectives, which would also be delayed, include Metro's ability to contribute to increased bus operating facility capacity system-wide, and to relieve overcrowding at Metro's divisions serving the Westside. With delay, Metro's objectives to improve transit service in all Westside communities, reduce pressures at other already overburdened facilities, and reduce the need to operate Westside and Central routes out of other sectors would be impeded. The project's objective to make the Westside and Central district more responsive to routing, scheduling, and refueling service requests would not be met.

Since the project site meets specific criteria for the installation and accommodation of CNG fueling infrastructure, the non-availability of this site under the No Project/Community Plan alternative would likely delay Metro's conversion to a 100 percent CNG fleet (new clean-fuel buses replacing older diesel buses), since the cost in time and mileage to shuttle buses to offsite locations for re-fueling would be a disincentive for conversion.

The loss of this site to a No Project/Community Plan alternative would also impede the project's objective to improve the efficiency of the transportation service delivery through state of the art facilities that reduce operating costs and to improve the efficiency of transportation service delivery through a more centralized facility within which buses are close to their routes, thereby reducing "deadhead"/non-revenue costs. Operating costs would increase due to buses needing to travel from further locations (e.g., San Fernando and San Gabriel Valleys) to meet increasing demands for transit in the Westside and Central areas.

Finally, the No Project/Community Plan alternative, as determined through the above analysis, would not avoid or substantially lessen any of the significant effects of the project and would not meet any of the basic objectives of the project. As such, it would be an unnecessary and inappropriate alternative development to be undertaken by a public agency.

V. ALTERNATIVES TO THE PROPOSED PROJECT
D. ALTERNATIVE C:
WEST LOS ANGELES TRANSPORTATION FACILITY SITE REDUCED PROJECT

1. DESCRIPTION OF THE ALTERNATIVE

The Reduced Project alternative assumes that the project site would be developed with a reduced version of the proposed West Los Angeles Transportation Facility. Under this alternative, 150 buses would be housed and serviced at the Transportation Facility. This represents a reduction of approximately 14 percent, or 25 buses from the 175 buses proposed under the project. The Reduced Project alternative would have facilities that are similar to those of the proposed project with approximately 53,120 square feet in an Administration/Maintenance building and approximately 19,000 square feet of auxiliary facilities. Since this floor area is an extremely low FAR (square foot of floor area per square foot of land) of 0.35:1, overall floor area is not considered as environmentally important as the number of buses serviced at the facility.

If this alternative were selected for development, alternative sites, including other district transit centers, would need to house and service the additional 25 buses needed for Metro's operation in West Los Angeles. As under existing conditions, daily shuttling from other district transit centers would be required. Although this alternative would not fully meet Metro's objectives, it was selected for analysis since it is considered a minimum beyond which the project would not be able to function as proposed. It would reduce total activity at the project site and would potentially reduce impacts associated with operation of the proposed West Los Angeles Transportation Facility in this location.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics

Visual Character. Under the Reduced Project alternative, the project site would be constructed similarly to the project's proposed development plans. Although greater capacity to service 175 buses would occur under the project, the structures and floor area associated with the 150-bus facility would be almost identical to the project. As such, impacts relative to visual quality would be similar. Both the Reduced Project alternative and the proposed project would have an upgraded and more formal appearance in relation to existing conditions of the site. Both

would have similar decorative walls and landscaping along Jefferson Boulevard. Relative to aesthetic character, the impacts of Reduced Project alternative and the project would be the same. Neither the proposed project nor the alternative would exceed thresholds of significance relative to aesthetic character and both would be less than significant.

Views. No valued viewsheds exist in association with the project site and no impacts on views would occur from either the Reduced Project alternative or the project. Neither alternative would exceed land use significance thresholds relative to views or scenic resources.

Illumination. As with the project, the Reduced Project alternative would generate new sources of light and glare. Lighting would be installed in accordance with city code and directed on-site. No sensitive receptors are located adjacent to the project site and no light and glare impacts relative to sensitive receptors are anticipated. Lighting for both alternatives would be similar and neither project would exceed light and glare impact thresholds.

Shading. The Reduced Project alternative would generate similar shading impacts to those of the proposed project. Shading impacts would be negligible and would not affect any sensitive receptors. Neither the proposed project nor the alternative would exceed thresholds of significance relative to shading and both would be less than significant.

b. Air Quality

The Reduced Project alternative would reduce the number of buses served from 175 to 150; but, the overall size and layout of the Transportation Facility would remain very similar to the project. The Reduced Project alternative would require the same amount of site grading, building square footage, and related construction activity, and as such, construction impacts would be the same as under the project. Impacts with respect to mass regional ROC, CO, NO_X, SO_X, and PM_{10} emissions, and localized CO, NO_X, and PM_{10} concentrations during construction would be less than significant.

The Reduced Project alternative would also generate mobile- and stationary-source regional mass emissions during the long-term operations period. Although the reduction in buses served would reduce trip generation from 1,247 to 1,188 daily trips, this development alternative may generate a net increase in long-term mass regional criteria pollutant emissions because: (1) trip reductions at the Transportation Facility site would simply be redistributed to other MTA maintenance facility sites; and (2) transit bus deadhead miles VMT, and related air pollutant emissions, would increase under the Reduced Project alternative when compared to the project. Nevertheless, similar to the project, this development alternative would still lead to a net reduction in long-term CO, ROC, and NO_X mass regional emissions, which would be a beneficial effect.

The decrease in traffic by 59 daily trip ends associated with the Reduced Project alternative would contribute to a proportionate decrease in localized CO emissions. The reduced localized mobile source CO emissions associated with this alternative, as with the project, would result in a less-than-significant impact. Also similar to the project, impacts relative to localized NO_X and PM_{10} concentrations, and long-term contributions to localized and regional cumulative impacts during the long-term operations period would be less than significant.

c. Historic Resources

This site does not contain historic resources and this topic was not evaluated for the Transportation Facility Project.

d. Geology/Seismic Hazards

The project site is located within the delineated Alquist-Priolo Fault Hazard Zone, although no Holocene (active) faulting within or adjacent to the property has been subsequently observed during geologic investigation. Although the site has been determined not to have fault ruptures, the development at this site would still be subject to seismically induced ground shaking. New development would be required to adhere to UBC foundation design parameters. Compliance with site preparation guidelines outlined in the geotechnical study would reduce the potential for the project to expose people to risk of injury, or result in substantial structural or infrastructure damage to less-than-significant levels. Since the Reduced Project alternative would be subject to the same geologic impacts, structural design requirements, and site mitigation as the project, both alternatives would have the same level of risk. Neither alternative, however, would exceed thresholds of significance related to geological hazard and seismic risk.

e. Hazardous Materials

Contamination of on-site soils associated with acetone, Total Recoverable Petroleum Hydrocarbon (TRPHs) and total volatile petroleum hydrocarbons (TVPHs), and fuel oxygenates, and minor contamination of groundwater associated with TVPHs and aromatic gasoline compounds have been discovered within the project site. According to the consulting environmental engineer, although the source of the TVPHs and aromatic gasoline components is unknown, it does not appear to pose a significant environmental threat at the project site.[244] Based on the results of the site's exploration and laboratory analyses, the consulting engineer has concluded that shallow soil impact by TRPH appears to be limited in lateral and vertical extent

[244] *Environmental Support Technologies, Inc., Phase I Environmental Site Assessment Addendum, October 30, 2003.*

and can be removed or treated on-site. Low detections of acetone in soil samples do not require further investigation as existing constituents will naturally degrade. Low isolated areas of soil and groundwater detections of TVPH, aromatic hydrocarbons, and fuel oxygenates in the general area of the sewer line have been determined to not be originating from this sewer infrastructure. These isolated detections are associated with unknown sources. The low concentrations of TVPH, aromatic hydrocarbons, and fuel oxygenates in the soil or groundwater do not appear to pose a significant risk to human health or the environment and do not warrant further assessment or remediation.[245] The development of the project under both the project and the Reduced Project alternative would provide opportunity for treatment of contaminated soils. As such, the Reduced Project alternative and the project would have the same impact relative to hazardous materials, although neither alternative would exceed hazardous materials thresholds of significance.

f. Water Quality

Construction activities associated with the project have the potential to expose soils to potential erosion or transportation via storm water into nearby storm drains and to expose storm water pollution to from construction materials. Implementation of Best Management Practices (BMP) as required by the NPDES Construction Permit and an approved SWPPP would reduce the potential for construction materials and soils exposed during the grading and construction process from being transported offsite and into nearby storm water drainage infrastructure. Both the Reduced Project alternative and the project would include several underground storage tanks for CNG and other fluids, although these tanks are neither large enough nor situated deep enough to interfere with groundwater movement beneath the project site. As groundwater levels below the site are generally 30 feet below ground surface, it is not anticipated that groundwater would be exposed to the surface during the construction phase and construction of the project would have no adverse impacts to groundwater quality or levels.

During project operations, waters from rinsing and washing vehicles in the proposed bus and chassis wash bay, would be considered unauthorized storm water discharges and must be treated on-site or the operator must obtain a separate NPDES permit for their discharge. In addition to bus and chassis washing on-site, the project proposes to have a CNG fueling station, bus maintenance bays, trash and vacuum containers, and open surface parking for both buses and employee vehicles. The City of Los Angeles BMP Handbook provides measures to reduce the impacts on storm water from these specific uses, including clarifiers for wash areas, elevated concrete pads for fueling stations, covered repair/maintenance bays to prevent storm water running onto the site, properly designed outdoor trash storage areas, and vortex separators for oil and grease runoff from parking lots. Implementation of required BMPs and monitoring program

[245] *Ibid.*

would reduce the potential for project related operational activities from creating sources of pollution that could contaminate storm water runoff. However, the project does propose to install underground storage tanks (USTs) that would hold CNG, oils (both new and used), and other potentially hazardous materials. Maintenance and monitoring of the project's USTs to prevent leaks or spills have the potential to adversely affect groundwater resources. The Reduced Project alternative would have similar potential impacts to the project during construction. During the operational phase of the Reduced Project alternative, the potential for the generation of sources of pollution would be incrementally less than under the project, since fewer buses would be washed and maintained. However, with the implementation of existing regulations, the project is not expected to exceed water quality standards, and the difference between the potential contamination derived from the Reduced Project alternative and the project would be negligible. As such, potential impacts related to water quality would be essentially the same under both development scenarios. Neither alternative would exceed water quality thresholds of significance.

g. Land Use

The policies of the Regional Comprehensive Plan and Guide (RCPG) support public transportation and infrastructure and the conversion of existing vehicles to clean fuel/alternative fuel. The City's General Plan Framework policies encourage improved public transportation services and means by which the effectiveness of transportation services can be improved and costs reduced. Objectives of the West Adams-Baldwin Hills-Leimert Community Plan relative to industrial land use provide for the retention of existing industrial designated areas and employment opportunities supported by industrial uses. The project was determined in the EIR Land Use analysis (Section IV.G of this EIR) to be in conformance with governing land use plans and policies and, therefore, less than significant. As with the project, the Reduced Project alternative would be consistent with the Community Plan, the RCPG, and the General Plan framework, since it would comply with the existing light industrial land use designation, support employment, and provide improved transportation services. The Reduced Project, however, would not meet Metro's fleet requirements for the Westside, and 25 buses would need to be stored in other divisions and shuttled to the Westside service routes. As such, the Reduced Project alternative would not be consistent with the city's General Plan Framework policy to improve the effectiveness of transportation services and reduce costs. Although neither alternative would exceed the thresholds of significance relative to applicable plans and policies, the Reduced Project alternative would have a greater environmental effect relative to governing plans and policies.

The Reduced Project alternative would also be similar to the project in that it would be a light industrial land use buffered from surrounding residential land uses by existing intervening light-industrial and/or commercial uses and would not be likely to disrupt, divide, or isolate any

existing neighborhoods, communities, or land uses. Since the project site would have 14 percent fewer buses, the Reduced Project alternative would be incrementally less disruptive to surrounding land uses since there would be fewer bus trips and less fueling activity. Neither of the alternatives, however, would exceed the thresholds of significance relative to land use compatibility, although the Reduced Project alternative would have slightly less effect relative to local activity. It should be noted, however, that due to shuttling, the Reduced Project alternative would generate greater overall activity than under the project.

h. Noise

The Reduced Project alternative would reduce the number of buses served from 175 to 150; but, the overall size and layout of the Transportation Facility would remain very similar to the project as proposed. This alternative would require the same amount of site grading, building square footage, and related construction activity, and as such, construction impacts would be the same as under the project. Therefore, the maximum noise level from this alternative would be similar to the project. The Reduced Project alternative would generate noise levels during construction that are well above the surrounding ambient levels, but impacts would be less than significant, similar to the project.

The Reduced Project alternative would generate mobile-source and on-site/stationary-source noise impacts that are very similar to the project. The same noise from bus idling, bus wash operations, air compressor machine operations, etc., that would occur on-site under the project would also occur under the Reduced Project alternative. As such, similar to the project, noise attributable to on-site/stationary-noise would be less than significant. The decrease in traffic by 59 daily trip ends associated with the Reduced Project alternative would result in a proportionate decrease in traffic related noise levels on surrounding roadways. Therefore, roadway noise impacts associated with this alternative, as with the project, would be less than significant. This alternative also would contribute to a less-than-significant cumulative impact to noise, similar to the project.

i. Transportation and Circulation

Short-term traffic impacts would occur during the construction of both the project and the Reduced Project alternative, due to construction traffic and street widening. The duration of construction activities under both alternatives would be similar since structures and infrastructure would be nearly the same. Both alternatives would require the widening of the south side of Jefferson Boulevard at the Jefferson/La Cienega intersection to facilitate right-turns. As required by the city, traffic control procedures would be implemented for any activity that would potentially interfere with through access, including pavement construction and haul

trucks/equipment turning onto or from the public street and no significant construction traffic impacts, under either alternative, are anticipated.

During operation, the Reduced Project alternative would generate approximately 14 percent fewer bus trips than the project (at the project site), reflecting the decrease in the Westside Transportation Facility's on-site fleet from 175 buses to 150 buses. The project would generate approximately 1,247 actual trips per day. Of this total, bus trips would account for approximately 419 daily trips, including 28 morning peak-hour trips and 36 afternoon peak-hour trips. With adjustment for buses,[246] the project would generate 1,666 trips per day, including 107 morning peak-hour trips and 103 afternoon peak-hour trips. Of this total, buses would account for approximately 838 daily trips, including 56 morning peak-hour trips and 72 afternoon peak-hour trips.

The Reduced Project alternative would generate approximately 1,155 actual trips per day. Of this total, bus trips would account for approximately 386 daily trips, including 27 morning peak-hour trips and 32 afternoon peak-hour trips. As such, the peak-hour bus trips would be reduced by 1 actual bus trip in the morning and 4 actual bus trips in the afternoon. Employee trips would be the same under both alternatives. Under LADOT requirements, the determination of street capacity is based on peak-hour trips, which would be similar under both alternatives. The Reduced Project alternative would not reduce any traffic impacts associated with the project or eliminate the need for the widening of Jefferson Boulevard to accommodate right turns onto La Cienega Boulevard. Neither the project, nor the Reduced Project alternative, would exceed thresholds of significance relative to congestion and intersection capacity.

While the trip generation would be slightly reduced under the Reduced Project alternative, it should be noted that trip reductions, would result in additional trips at an alternative site. As such, related impacts would be relocated as opposed to eliminated. Further, those trips would likely be accommodated at a more remote location relative to the service area. This could result in greater impacts regionally.

j. Parking

The Reduced Project alternative would provide parking stalls for up to 150 buses and 240 employee parking spaces, greatly exceeding parking required under the LAMC (97 spaces) and

[246] *The traffic volume assessment for the project used an adjustment factor to account for the effect of buses or heavy vehicles on the capacity of the streets and intersections. Heavy vehicles are those with more than four tires touching pavement. Adjustments for heavy vehicles are necessary to account for the additional space occupied by these vehicles and for the difference in operating capabilities compared to passenger cars. To account for these effects, each bus is converted to an equivalent of 2.0 passenger cars (PCE).*

meeting work-force requirements. As was the case with the proposed project, the parking would meet the needs of project employees, and impacts would be less than significant.

k. Utilities

(1) Water

The Reduced Project alternative would have nearly the same developed floor area as the project. Since floor area is the factor upon which water demand is estimated, the water demand would be similar under both alternatives. As described in the domestic water supply analysis in Section IV.K of this EIR, the project is estimated to require approximately 6,624 gallons per day (gpd). The water demand associated with either the Reduced Project alternative or the project would not exceed thresholds of significance relative to City of Los Angeles water supplies and water distribution capacity, after appropriate infrastructure improvements have been installed. Both alternatives would, therefore, be less than significant.

(2) Wastewater

The Reduced Project alternative would have approximately the same developed floor area as the project. Since floor area is the factor upon which wastewater generation is estimated, wastewater generation is expected to be similar under both alternatives. As described in the domestic water supply analysis in Section IV.K of this EIR, the project is estimated to generate approximately 5,760 gallons per day (gpd) of wastewater. Wastewater generation associated with the either the Reduced Project alternative or the project would not exceed thresholds of significance relative to the City of Los Angeles wastewater collection and treatment infrastructure. As such, both alternatives would be less than significant.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Reduced Project alternative assumes that the project site would be developed with a reduced version of the proposed West Los Angeles Transportation Facility. Under this alternative, 150 buses would be housed and serviced at the Transportation Facility and 25 would be housed, maintained, and fueled at other facilities and shuttled to the Westside for operation. As such, the Reduced Project alternative would only partially meet the project's objectives due to limitations on the extent of service that could be provided.

Specifically, the Reduced Project alternative would not meet the project's explicit objective to improve the efficiency of transportation service delivery from a more centralized facility, within which buses would be housed and maintained close to their routes to the same

extent as the proposed project. This alternative would also not meet the project's objective to reduce pressures at other already overburdened facilities, or reduce the need to operate Westside and Central routes out of other sectors. The inefficiency of shuttling a percentage of the fleet would also impede the project's objective of reducing operating costs, and increased costs from buses traveling from more distant locations may occur.

Because the Reduced Project alternative would be less than the project's required design capacity, it would not meet the project's objective to construct a new facility intended to relieve existing crowding and pressures on other Metro districts, so nearly as the proposed project. With the reduced capacity of the Reduced Project alternative, the inefficiency of the Westside Transportation Facility would be accelerated over time, as demand for public transportation increases, leading possibly to the untimely obsolescence of the new transportation center.

Finally, the Reduced Project alternative is shown through the above analysis to not avoid or substantially lessen any of the significant effects of the project. In light of the failure of this alternative to meet many of the basic objectives of the project and its failure to substantially lessen any of the significant effects of the project, it would be considered an ineffective alternative under CEQA Guidelines (Section 15126.6(a)), which requires that an alternative feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project.

V. ALTERNATIVES TO THE PROPOSED PROJECT
E. ALTERNATIVE D:
WEST LOS ANGELES TRANSPORTATION FACILITY SITE ALTERNATE SITE

1. DESCRIPTION OF THE ALTERNATIVE

In accordance with CEQA Guidelines Section 15126.6(f)(2), alternative locations for the proposed project have been considered. As stated in the Guidelines, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered in the EIR.[247] For purposes of this analysis, a specific alternate site was not selected. Rather, general areas were deemed to be viable for the development of the proposed project.[248]

The Alternative Location alternative assumes that the Jefferson Boulevard property would remain in its existing condition and the West Los Angeles Transportation Facility would be constructed at another site. If the project were developed in an alternative location, that site would need to meet specific criteria unique to a regional transportation center. The existing District 6 Sunset facility could not serve as an alternative location since it is in need of modernization and does not have the available utility infrastructure or appropriate location for CNG fueling operations. If buses continued to be housed at the Sunset Avenue site, they would need to be fueled at alternate locations, involving considerable shuttling of buses and increased operating costs.

Finding and acquiring development sites has been a difficult challenge for Metro since potential sites, which would meet the needs of a transportation center, are limited. In a continuous process of identifying and selecting sites for its various facilities, Metro has been attempting to find a new site for the relocation of Division 6 since 1976. The acquisition of the Jefferson Boulevard site represents the culmination of several years of searching for an alternative to the Sunset Avenue location. Several criteria must be met for site acquisition, including a central location within the West Los Angeles Transportation Facility service area and a location zoned for industrial uses. Another factor in site selection is the cost of land. In many instances, land has been priced too high for a public service, rendering purchase infeasible. In addition, when suitable sites are available, Metro must compete with the private development

[247] *CEQA Guidelines Section 15126.6(F)(2)(A).*

[248] *The Metropolitan Transportation Authority does not currently own property that could serve as an alternative site for the West Los Angeles Transportation Facility.*

community, which typically, moves more quickly than a governmental agency in property acquisition. As a public service, Metro is entitled to practice eminent domain, however, it chooses to avoid this avenue of acquisition, except where specifically warranted, due to community relations and Metro's standard practices.

The discussion of the concept of an alternative location is presented in this EIR to determine if an alternative location would reduce any environmental impacts unique to the Jefferson Boulevard property. Environmental impacts associated with the alternative location project can only be generally determined.

2. ENVIRONMENTAL IMPACTS

Within the Westside service area, the proposed Transportation Facility would be located in a developed area, since the entire Westside region is highly urbanized. Impacts associated with the operation of the Transportation Facility, as described in Section IV of this EIR, would occur in any alternative location, irrespective of adjacent and surrounding land use. The degree of impact can, however, be increased or reduced according to the proximity of certain land uses, such as sensitive receptor uses or, in the case of aesthetic impacts, the visual quality of the setting.

It is assumed that any suitable alternative location would be within an industrial zone and near high-capacity arterials, as is the project. The potential effects associated with the project or the project site, such as construction impacts, visual character, lighting, air quality, geologic hazards, existing hazardous materials, hydrology, land use, noise, traffic, parking, water use, and water quality are expected to be similar at any alternative industrial location in close proximity to high-capacity arterials.

For example, land use effects pertaining to compliance with governing land use plans and policies would be similar between two industrially-zoned sites since the development of the Transportation Facility at an alternative location would be consistent with the policies of the Regional Comprehensive Plan and Guide (RCPG), which support public transportation and infrastructure and the conversion of existing vehicles to clean fuel/alternative fuel; the City's General Plan Framework policies, which encourage improved public transportation services and means by which the effectiveness of transportation services can be improved and costs reduced; and community plans, which support retention of existing industrial land and the generation of employment supported by industrial uses. In relation to land use compatibility, the development of the project (an industrial use) within an established industrial zone adjacent to major arterials, would not meet a level of significance contributing to neighborhood and community disruption, division, or isolation. If the alternative location were similarly situated within a designated

industrial area, its land use effects would be similar, but not fewer. Therefore, the alternative location would not serve to reduce any land use impacts. If the alternative location were not situated within a designated industrial area, the alternative location would have greater land use impacts than the project and would certainly not reduce any land use effects associated with the project.

Other factors could also increase the impacts of the Alternative Location alternative, even if located within an industrial zone. For instance, if the alternative location were in a highly visible area, such as the crest of a hill or scenic corridor, the visual quality or lighting effects would be greater than under the project.

Construction of the either the project or the Alternative Location alternative would have the same potential to expose soils to potential erosion or to expose storm water runoff to potentially hazardous construction materials. Under either alternative, the implementation of Best Management Practices (BMP) would be required by the NPDES Construction Permit and other water quality regulations. Under either alternative, the washing and servicing of buses during project operations would be a potential source of contamination and the facility would require a CNG fueling station, bus maintenance bays, trash and vacuum containers, and open surface parking for both buses and employee vehicles. Under either alternative, potential contamination would be addressed and monitored in accordance with the City of Los Angeles BMP Handbook. As with land use impacts, the effects of the Alternative Location alternative would be similar to the project and would not be reduced due to the change of location.

The designation of an Alquist-Priolo zone in the project site proximity would indicate the potential presence of an active earthquake fault at that site. However, geologic studies, including trenching and borings, have indicated that no fault trace is located within or adjacent to the property. As such, the project site would have the same, or similar, propensity for groundshaking as any other alternative location in the Westside.

The traffic analysis contained in Section IV of this EIR, demonstrates that no significant traffic impacts would be caused by the project, under the threshold criteria established by the LADOT. However, at the intersection of Jefferson and La Cienega inbound buses traveling southbound on La Cienega Boulevard would have a difficult right-turn maneuver to westbound Jefferson Boulevard. Further, there would be potential impacts on queuing for eastbound Jefferson travelers turning left onto La Cienega Boulevard. These conditions are addressed in a mitigation measure, in which the south side of Jefferson Boulevard would be widened along the Exposition right-of-way. It is a reasonable assumption that any alternative location would be adjacent to similar major arterials and that similar roadway adjustments would be required to accommodate the wider turning radii of the buses. Total daily and peak-hour bus trips and employee trips would be the same for either alternative. However, if the Alternative Location

alternative were not located adjacent to high-volume arterials, the potential for transportation impacts could be greater if intrusion into local streets or neighborhoods were required for access.

The Air and Noise sections of this EIR also demonstrate that, under the project, no significant impacts would occur relative to adjacent land uses and sensitive receptors. This is primarily due to the location of the project within an industrial zone and the distance between the project site and sensitive receptors. The Hazardous Materials section of this EIR identifies minor levels of contamination within the project site's soils and groundwater, which would be treated with the development of the project. Water and soil contamination is typical of an industrial land use and would be anticipated at any location in proximity to underground storage tanks, such as gas station sites, or other sites which commonly handle or produce hazardous materials, such as auto repair shops, instrument manufacturing, cleaners, paint shops, printers, and similar uses. It is reasonable to assume that any appropriate alternative industrial location would have similar exposure. Water and wastewater demand and generation would be similar in either the project site or an alternative location.

Overall, due to the suitability of the Transportation Facility at the project site, the Alternative Location alternative would not reduce any environmental impacts associated with the project site. As such, there would be no environmental advantage in the development of the project in an alternative location.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The selection of the Jefferson Boulevard site is the culmination of several years of site search, in which Metro has unsuccessfully attempted to purchase other sites for the relocation of the Division 6's Sunset facility. The Jefferson Boulevard site meets Metro's criteria for acquisition including its centralized location in the Westside and Central service area, proximity to major arterials, size, zoning designation, availability, and cost. Although another location meeting these criteria would be acceptable, such alternative locations are not presently known.

The logistics of an additional site search would considerably delay Metro's ability to achieve its intended objectives. Short-term and long-term objectives, which would also be delayed include Metro's ability to increase bus operating facility capacity system-wide, and to relieve overcrowding at Metro's divisions serving the Westside and Central areas, and to provide facilities capable of operating and maintaining CNG-fueled buses. With delay caused by the re-initiation of a search for another development site, the project's objectives to improve transit service in all Westside communities, reduce pressures at other already overburdened facilities, and reduce the need to operate Westside routes out of other sectors would be impeded. The project's objective to make the Westside and Central district more responsive to routing,

scheduling, and refueling service requests would not be met. Operating costs would increase due to buses needing to travel from further, distant locations.

Further, it cannot be guaranteed that an alternative location would be as well sized, situated and located as the Jefferson Boulevard site. Acceptance of a lesser-suited site, as a matter of necessity, could cause a reduction in operations efficiency, and environmental impacts arising from constraints at the alternative site.

Due to the extent of Metro's search for a development site, the failure to find other appropriate sites over a many-year period, and the un-likelihood that any alternative location would reduce the environmental effects of the project, it is concluded that the Alternative Location alternative would not meet the Applicant's objectives, nor address any of the project's significant impacts, as intended by the CEQA Guidelines.

V. ALTERNATIVES TO THE PROPOSED PROJECT
F. ALTERNATIVE E:
SUNSET AVENUE SITE
NO PROJECT/NO BUILD ALTERNATIVE

1. DESCRIPTION OF THE ALTERNATIVE

CEQA Guidelines, Section 15126.6(e)(2) require the evaluation of a No Project alternative, which discusses the continuation of existing conditions at the time the Notice of Preparation for the EIR is published. The No Project/No Build alternative assumes that the residential project would not be developed, and that the Sunset Avenue site would continue in its current condition (condition at the time the EIR Notice of Preparation is published). No new development or alterations to the property would take place. Under this alternative, the West Los Angeles Transportation Facility would remain in its current location. The site would most likely continue its current uses for the near future, and perhaps for some time into the future. Metro would be expected to continue searching for an alternative site, as the existing facility, in need of modernization, lacks the infrastructure and appropriate location to provide CNG fueling. Other Metro facilities are overburdened and unable to take up overflow from this facility. In some cases buses serving the Westside are already being housed out-of-division, increasing the loads at those facilities, and increasing the amount of miles traveled by buses. At some point in the future, Metro would be in the position of housing buses at the Sunset Avenue site but fueling them at an alternate location. Due to the need for offsite CNG fueling during non-operating hours, buses would be shuttled to fueling locations during the night, resulting in increased nighttime traffic noise in the surrounding residential neighborhood. The shuttling of buses would also be inefficient, costing a considerable number of additional travel miles, and additional financial costs. Further, it would be necessary to increase the operating hours at the site causing additional nighttime activity, noise, etc.

Issues pertaining to relocation of the Metro facilities at an alternative site are addressed in alternatives analysis for the Transit Facility site. As indicated, if the proposed projects were not approved, Metro would have considerable reason to find an alternative site. However, in view of the difficulty Metro has experienced in the past in finding and acquiring appropriate development sites, immediate success would not be guaranteed. This alternative was selected for evaluation as a requirement of the CEQA Guidelines, Section 15126.6(e)(2).

2. ENVIRONMENTAL IMPACTS

a. Aesthetics

Visual Character. Under the No Project/No Build alternative, no changes in the visual character of the project site would occur. The existing Division 6 transportation facility would continue in its existing condition, though some intensification of operations there could occur as Metro pursues its mission. Since the existing uses are not aesthetically significant, the retention of such uses would not have any particular environmental benefit. Under this alternative, visual amenities associated with the project's architectural style and other architectural and landscape features would not be developed at the project site. Implementation of the No Project/No Build alternative, however, would eliminate aesthetic character impacts associated with the project's height. However, in relation to the No Project/No Build alternative, the project would generally improve the overall visual character of the project site, while the No Project alternative would avoid issues of height and scale associated with the project. Since the No Project/No Build alternative would not specifically address the project's height issue, however, it would not be considered an appropriate mitigation for the visual character impact.

Views. The project site is not a valued view resource and views over the site are limited due to the flat terrain and intervening development. Neither the No Project/No Build alternative or the project would exceed view and scenic resources thresholds of significance.

Illumination. Under the No Project/No Build alternative, no new lighting would be added to the Project Site. Lighting would continue to be used during the evening hours to support existing bus parking and maintenance activities. Lighting associated with the proposed residential/commercial project would be similar to the No Project/No Build alternative, and similar to existing lighting within surrounding commercial and residential areas. Illumination levels would not be greater under the project than under existing conditions. The evaluation of Light and Glare in Section IV.A, of this EIR determined that the project would not generate significant light and glare impacts. Since lighting associated with the No Project/No Build alternative would be similar to the project, neither alternative would exceed light and glare thresholds of significance.

Shading. Under the No Project/No Build alternative no new structures would be added to the project site and no shading impacts would occur. Impacts of the No Project/No Build alternative would be less when compared with the proposed project, which would result in less than significant shading impacts.

b. Air Quality

The No Project/No Build alternative would not result in any increase in emissions associated with construction activities or changes to existing operations at the MTA Venice facility. Therefore, the No Project/No Build alternative would not have potential to violate any air quality standards, contribute to an existing or projected air quality violation, expose sensitive receptors to substantial new pollutant concentrations or generate new odors that result in nuisance as defined by SCAQMD Rule 402.

Air quality impacts under this alternative would not occur. As such, under the No Project/No Build alternative, the short-term significant and unavoidable impact related to mass regional NO_X emissions would be avoided, as would the project's contribution to a short-term significant and unavoidable cumulative impact to regional air quality during construction. In addition, the following less-than-significant impacts to air quality would be avoided: (1) mass regional ROC, CO, NO_X, SO_X, and PM_{10} emissions during construction; (2) localized PM_{10}, NO_X and CO concentrations during construction; (3) mass regional ROC, NO_X, CO, SO_X, and PM_{10} emissions during long-term project operations; (4) localized CO, NO_X, and PM_{10} concentrations during long-term project operations; and (5) long-term air pollutant contributions to localized and regional cumulative impacts.

c. Historic Resources

The No Project/No Build Alternative would not involve excavation or grading activities or require the removal of the concrete block west wall of the bus washing structure upon which the Vietnam POW/MIA Memorial Mural is painted. This wall is considered an historical resource for the purposes of CEQA, and removal of such would be an adverse though not significant adverse impact relative to historical resources. As this Alternative would not modify the project site in any way, no impacts on historical resources would occur. Impacts to historic resources would be less under the No Project/No Build alternative than under the proposed project.

d. Geology/Seismic Hazards

As described in Section IV.D, of this EIR, the project site has been identified as having potential risk of ground shaking and liquefaction. New development would be required to adhere to a significantly higher-than-code lateral design parameter to reduce potential structural damage. With the development of the site, the subterranean parking facility would create an impervious surface below the entire project site and reduce liquefaction potential. Compliance with site preparation requirements outlined in the geotechnical study would reduce the potential for the project to expose people to risk of injury, or result in substantial structural or

infrastructure damage from liquefaction to less-than-significant levels. Under the No Project/No Build alternative, however, no new construction would occur. As such, older structures would not comply with the same safety standards associated with new construction and, without the impervious subterranean parking structure associated with the project, liquefaction potential would remain greater than under the project. The No Project/No Build Alternative would have greater geologic/seismic hazard impacts than the project and would not reduce any of the project's seismic-related impacts.

e. Hazardous Materials

The project site has been used as an industrial location for more than nine decades. Historical uses on-site included a former power plant, rail yard, and an unpaved vehicle maintenance yard. These historic uses indicated a potential for site contamination ranging from PCBs, petroleum derivatives, pesticides, and unidentified underground storage tanks (USTs). Recognized environmental conditions described in a Phase II assessment include the existing on-site use and storage of a range of hazardous substances and USTs including or containing oils, lubricants, gear lubricant, and motor oil. The Streamlined Risk Assessment prepared for the site has determined that there are no significant levels of contamination, either in the soils or groundwater that would have a significant impact on human health or the environment.

Under the No Project/No Build alternative, the site would remain in its current condition. Removal of low-level contaminated soils and existing USTs would not occur, since these are located below existing pavement and structures. Since these soils and USTs would not be removed under the No Project/No Build alternative, hazardous materials would remain on-site. As such, hazardous materials impacts under the No Project/No Build alternative would be greater than hazardous materials impacts associated with the project, since the project would be required to remove low-level contaminated soils, existing USTs, and other stored hazardous materials.

f. Water Quality

The EIR does not evaluate water quality for the Sunset site, since it was determined in the Initial Study that the proposed project would improve surface water quality associated with runoff therefrom.

g. Land Use

The No Project/No Build alternative anticipates the continuation of Metro's Division 6 facilities in their current location. Although this use would be consistent with the existing M (industrial/manufacturing) zoning, it would not be consistent with the intent of the Venice Community Plan and Venice Local Coastal Land Use Plan (LUP) to promote greater individual

choice in type, quality, price and location of housing (including very low income housing) and to encourage mixed residential/commercial uses in commercial zones. As such, the continuation of the existing zoning and land use would have a greater land use impact relative to governing plans and policies than the proposed mixed-use project. Nonetheless, as with the proposed project, impacts would be less than significant.

Metro anticipates the increased need for shuttling of buses to and from the Division 6 facility, due to the increased demand for buses and the future need for CNG fueling. Since shuttling for CNG fueling would occur at night, this activity would be potentially disruptive to existing residential neighborhoods located along the shuttle routes and adjacent to the project site. In relation to land use thresholds of significance pertaining to potential disruption of existing neighborhoods, the No Project/No Build alternative would have a greater land use impact than the proposed project. Nonetheless, as with the proposed project, impacts would be less than significant.

h. Noise

The No Project/No Development alternative would not result in changes to local noise conditions present on or adjacent to the project site. Since construction activity would not occur, the short-term significant and unavoidable noise impacts to residential receiver locations that surround the project site would be avoided. In addition, the long-term less-than-significant noise impacts at receiver locations surrounding the project site location due to changes in roadway traffic volumes and on-site residential-use noise sources such as lawn maintenance activities and congregation areas (e.g., courtyard, pedestrian path and roof-top deck areas) would be avoided. This alternative also would avoid the project's less-than-significant cumulative noise impact.

However, the beneficial effects related to reduced roadway noise that would result from (1) the absence of local transit bus traffic volumes occurring during pre-dawn and late night hours, and (2) removal of the VA Mural that amplifies roadway noise west of the project site along Pacific Avenue, would not occur. Further, increases in nighttime noise would occur with increases in operating hours.

i. Transportation and Circulation

Under the No Project/No Build alternative, no construction or construction traffic impacts would occur.

Under the No Project/No Build alternative, the District 6 transportation facility would continue operation, as under existing conditions. This facility is estimated to generate approximately 750 daily trips, including 48 morning peak-hour trips and 18 afternoon peak-hour

trips. As described in Section IV.I, of this EIR, the project would generate a net increase of approximately 1,168 daily trips, including 107 morning peak-hour trips and 174 afternoon peak-hour trips. Compared with the No Project/No Build alternative, the project's traffic increase would result in significantly more traffic and potentially significant intersection capacity impacts. These impacts, however, would be reduced to less-than-significant levels with the implementation of a range of street-improvement mitigation measures, including the re-striping of several street sections and the removal of approximately four on-street parking spaces on Rose Avenue and approximately three on-street parking spaces on the west side of Main Street. Since the No Project/No Build alternative would generate less traffic than under the project, it would eliminate the project's significant traffic impacts, the requirement for mitigation measures, and any secondary effects associated with mitigation.

j. Parking

Under the No Project/No Build alternative, existing structures and facilities would remain unchanged and no additional parking, including any Beach Impact Zone parking or fee parking for surrounding residents would be required or added. Although the No Project/No Build alternative would not generate a demand for additional parking, since it would not provide any Beach Impact Zone parking, it would not address public parking needs and have a less beneficial impact relative to parking than the project.

k. Utilities

(1) Water

The No Project/No Build Alternative would not result in the upgrading or change in the existing use of the project site as Metro's District 6 bus facility. Existing water demand of 1,408 gallons per day (gpd) would be maintained at the current rate. By comparison, the project would generate a net increase of 38,578 gpd of wastewater. The implementation of the No Project/No Build alternative would reduce the project's water demand. Although the No Project/No Build Alternative's water demand would be minor in relation to the project, neither alternative would exceed thresholds of significance related to City of Los Angeles water supply and water distribution capacity. As such, impacts related to water supply and infrastructure would be less than significant.

(2) Wastewater

The No Project/No Build alternative would not result in the upgrading or change in the existing use of the project site as Metro's District 6 bus facility. Existing wastewater generation of 1,224 gallons per day (gpd) would be maintained at the current rate. Compared with the

project, which would generate a net increase of 33,546 gallons per day (gpd), wastewater generation would be miniscule under the No Project/No Build alternative. The implementation of the No Project/No Build alternative would reduce the project's wastewater generation; however, neither alternative would exceed thresholds of significance related to City of Los Angeles wastewater collection and treatment infrastructure. As such, impacts related to wastewater generation would be less than significant.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The No Project/No Build alternative would not meet the primary purposes of the project to generate the land use and economic justification to relocate the existing Division 6 bus operations and maintenance facility and to develop a mixed residential and commercial project, inclusive of affordable housing and public parking. Since the project site would remain in its existing condition, the No Project/No Build Alternative would not meet the project's objective to transform an historically outdated land use to provide a mix of affordable and market rate housing in response to projected population growth rates and demand for housing identified in the Venice Community Plan. It also would not maximize new parking opportunities in compliance with Beach Impact Zone parking policies.

The existing use is identified as an obsolete and incongruously located transportation infrastructure facility. The continuation of this use under the No Project/No Build alternative would impede the project's objective to provide a modern residential/commercial uses that would be complimentary with the mix of existing and projected residential and commercial uses in the area.

The No Project/No Build alternative would not allow maximization of the value of the existing property through the replacement of an obsolete transportation infrastructure facility with the maximum amount of housing and neighborhood serving commercial uses that can be supported by the local environment. The No Project/No Build alternative would not meet the project's objective to improve the economic conditions of the area by developing appropriate levels of housing and supportive commercial uses on an underutilized parcel. Finally, the No Project/No Build alternative would also prevent the project's objective to promote the opportunity for people of varying socio-economic backgrounds to own quality housing in a dynamic, vibrant community.

V. ALTERNATIVES TO THE PROPOSED PROJECT
G. ALTERNATIVE F:
SUNSET AVENUE SITE
ALTERNATIVE USE/COMMERCIAL DEVELOPMENT

1. DESCRIPTION OF THE ALTERNATIVE

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative may discuss "predictable actions by others, such as some other project if disapproval of the project under consideration were to occur." CEQA Guidelines, Section 15126.6(e)(2) further states that the No Project Alternative should project what would be reasonably expected to occur in the foreseeable future, if the project were not approved, based on current plans and consistent with available infrastructure and community services. Accordingly, this Alternative Use alternative assumes that if Metro vacated the Sunset Avenue site and the proposed residential/commercial project were not approved, the project site would become an attractive location for future development. The site is located at a confluence of existing land uses, and interested parties could potentially pursue a variety of uses. The Sunset Avenue site is located adjacent to residential development on the east, south, and west. A variety of residential, light industrial (artists' lofts), and commercial uses front Main Street, north and south of the site. Abbot Kinney Boulevard to the east includes a range of community-serving commercial uses. Under the Venice Coastal Zone Specific Plan, the project site is designated as CM (Commercial/Limited Manufacturing), which allows a range of commercial and limited manufacturing uses, as well as residential uses. The intent of the zoning is for mixed commercial and residential uses, in accordance with the Venice Community Plan.

The City's General Plan Framework Element focuses on Abbot Kinney Boulevard and its extension (Main Street) as a community center. Since the General Plan Framework anticipates additional commercial development in the Main Street corridor and the current CM zoning of the site would support community commercial use, it is also reasonably expected that the site would be developed with a community commercial land use.

The Alternative Use alternative assumes that the site would be developed with a commercial project, consistent with the Specific Plan designation. The anticipated floor area would be approximately 102,250 square feet, reflecting a floor area ratio (FAR) of 0.75:1 (0.75 square foot of floor area per 1.00 square foot of land) on the 3.13-acre site. Although the property would be allowed an FAR of 1.5:1 under the designated CM zone, an all-commercial project in this area is expected to have less floor area than a mixed residential use, since commercial uses are seldom multiple level. This alternative was selected for analysis since it

reflects existing infrastructure, land use trends in the vicinity, and the existing land use designation of the site. Further, since it is dissimilar to the project, it can be contrasted with the project in order to determine if it would reduce the environmental effects of the project.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics

Visual Character. Under the Alternative Use alternative, the project site would be entirely committed to commercial land use. The visual character of development is expected to be typical of modern commercial uses. An FAR of 0.75:1 is anticipated for commercial development, resulting in approximately 102,250 square feet of floor area, less than half of the floor area associated with the project. Building heights, however, could be as high as 30 feet, reflecting the greater volume often associated with commercial uses. While such commercial development could be well designed, the nature of the uses for which it would be designed in relation to the existing composition of surrounding uses and improvements does not suggest harmony. Under the Aesthetics evaluation (Section IV.A, of this EIR) the project is described as having a potentially significant impact relative to height and scale in the proximity of residential uses along Sunset Avenue and Thornton Place. While the Alternative Use alternative would have less impact than the project relative to height and would, therefore, reduce aesthetic impacts associated with height, it may have other impacts associated with aesthetic character due to an inharmonious transition in character with properties across Sunset Avenue and Thornton Place. Impacts relative to visual character would be similar.

Views. The project site is not a valued view resource and views over the site are limited due to the flat terrain and intervening development. Neither of the alternatives would impact valued viewsheds nor exceed thresholds of significance relative to views and scenic resources.

Illumination. Under the Alternative Use alternative, lighting would be similar to nearby commercial uses and the existing facility, in which lighting would be used during the evening hours to support commercial uses and provide pedestrian security. Lighting impacts on adjacent residences would be greater than under the project along Sunset Avenue and Thornton Street, due to the potential proximity of business signage to existing residential uses. Commercial signage and illumination have the potential to substantially illuminate adjacent, off-site, light-sensitive uses and would, therefore, be considered potentially significant. As such, the light and glare impact under the Alternative Use would be greater than under the project.

Shading. The Alternative Use alternative would have lower building heights than the proposed project, and generate less off-site shading. Impacts with the proposed project fall at

limited locations and limited times of the year. The proposed project's extreme shadow conditions are less than significant, as would be the case with the lesser impacts of the Alternative Use alternative.

b. Air Quality

The Alternative Use alternative would result in the development of the project site with a 102,250-square foot commercial use, which would be a less intensive development than the 225 residential units and 10,000 square feet of commercial frontage proposed under the project. During construction, the Alternative Use alternative would require similar amounts of site grading and excavation, but as a result of the reduction in building area, there would also be a reduction in the overall amount of construction activity. However, on days of intensive construction activities, both the number of construction workers and heavy-duty construction equipment would be similar to the project. Regional mass daily emissions under the Alternative Use alternative would be similar to project emissions, because the duration (i.e., number of days) and not the intensity of construction activities would be reduced. As a result, impacts relative to NO_X regional mass emissions during site grading and excavation would be significant and unavoidable, as would this project alternative's contribution to a short-term significant and unavoidable cumulative impact to regional air quality during construction. Also similar to the project, impacts relative to ROC, CO, PM_{10}, and SO_X regional mass emissions, as well as localized PM_{10}. CO and NO_X concentrations during construction would be less than significant.

The Alternative Use alternative would also generate mobile- and stationary-source regional mass emissions during long-term operations. The change in development would increase trip generation from 2,326 to 4,840 daily trips, which would generate a net increase in long-term mass regional criteria pollutant emissions when compared to the project as proposed. Nevertheless, pollutant emissions would not exceed SCAQMD daily significance thresholds and impacts relative to mass regional emissions would be less than significant.

The increase in traffic by 2,514 daily trip ends associated with the Alternative Use alternative would contribute to a proportionate increase in localized CO emissions. However, the increase in localized mobile source CO emissions associated with this alternative, as with the project, would result in a less-than-significant impact. Also similar to the project, impacts relative to localized NO_X and PM_{10} concentrations, as would long-term contributions to localized and regional cumulative impacts, during the long-term operations period would be less than significant.

c. Historic Resources

The Alternative Use alternative would require the demolition of existing on-site structures, including the concrete block west wall of the bus washing structure, upon which the Vietnam POW/MIA Memorial Mural is painted. This mural is considered an historical resource for the purposes of CEQA and its removal would be an adverse but not significant impact relative to historical resources. As with the project, this alternative would be required to mitigate adverse impacts through photographic recordation of the mural and exploration of possible relocation. The impact of this alternative relative to historical resources would be similar to the project. Under both alternatives, impacts relative to an historical resource would be less than significant.

d. Geology/Seismic Hazards

As described in Section IV.D, of this EIR, the project site has been identified as having potential risk of ground shaking and liquefaction. New development would be required to adhere to a significantly higher-than-code lateral design parameter to reduce potential structural damage. With the development of the site, the subterranean parking facility would create an impervious surface below the entire project site and reduce liquefaction potential. Compliance with site preparation guidelines outlined in the geotechnical study would reduce the potential for the project to expose people to risk of injury, or result in substantial structural or infrastructure damage from liquefaction to less-than-significant levels. Since the Alternative Use alternative would consist of the construction of a subterranean parking structure and new commercial buildings, it would be subject to the same geologic impacts, structural design requirements, and site mitigation as the project. In relation to geologic hazards and seismic safety, both alternatives would have the same level of risk, although neither alternative would exceed thresholds of significance. Since the level of risk would be the same under both alternatives, the Alternative Use alternative would not reduce the project's impacts relative to geology and seismic hazards. Impacts associated with grading and excavation would be similar under Alternative Use alternative and the project, due to the need for both alternatives to provide a large, two-level subterranean garage.

e. Hazardous Materials

The project site has been used as an industrial location for more than nine decades. Historical uses, such as a former power plant, rail yard, and unpaved vehicle maintenance areas would have indicated a potential for site contamination ranging from PCBs, petroleum derivatives, pesticides, and unidentified underground storage tanks (USTs). However, the Phase II and subsequent Streamlined Risk Assessment have determined that there are no significant

levels of contamination, either in the soils or groundwater that would have a significant impact on human health or the environment.

Under the Alternative Use alternative, the site would be excavated for a two-level subterranean garage. As the site has officially received case closure as of August 10, 2004 by the Regional Water Quality Control Board, the appropriate removal and disposal of all soils and debris would have no significant impacts.[249] As such, this alternative would be similar to the project, where impacts relative to hazardous materials would be less than significant under both alternatives.

f. Water Quality

The EIR does not evaluate water quality for the Sunset site, since it was determined in the Initial Study that the proposed project would improve surface water quality associated with runoff therefrom.

g. Land Use

The Alternative Use alternative would be consistent with the proposed CM zoning and the Los Angeles General Plan Framework designation as a community-oriented center that would potentially serve adjacent neighborhoods. As an all-commercial use, however, this alternative would not meet the intent of the Venice Community Plan and Venice Local Coastal Land Use Plan (LUP) to locate higher residential densities near commercial centers and major bus routes, to encourage mixed multiple family and commercial uses in commercial zones, and to promote greater individual choice in type, quality, price and location of housing (including very-low- income housing). The Alternative Use would have a greater land use impact relative to governing plans and policies than the proposed mixed-use project.

The development of commercial structures along Sunset Avenue and Thornton Place would be less consistent, in relation to land use since they would be new commercial structures located adjacent to existing residential uses. As such, this use located directly across these narrow streets would cause potentially greater disruption of adjacent residential neighborhoods than multiple-family residential uses. As such, the Alternative Use alternative would have a greater impact than the project in relation to land use. Nonetheless, as with the proposed project, impacts would be less than significant.

[249] *California Regional Water Quality Control Board-Los Angeles Region, Underground Storage Tank Program Case Closure Division 6 100 Sunset Avenue, Venice (ID# 902910152), August 10, 2004*

h. Noise

The Alternative Use alternative would require similar amounts of site grading and excavation, but as a result of the reduction in building area, there would also be a decrease in the overall amount of construction activities that would occur on site. On days of intensive construction activities, both the number of construction workers and heavy-duty construction equipment would be similar as the project. Therefore, the maximum noise level from this alternative would be similar to the project, but the duration of construction noise would be reduced. As with the project, the Alternative Use alternative would generate noise levels during construction that are well above the surrounding ambient levels, and noise impacts during construction would be significant and unavoidable.

The Alternative Use alternative would generate mobile-source and on-site/stationary-source noise impacts, similar to the project. Noise from commercial-use sources such as trash compaction, loading dock activity, truck idling, etc., would occur on-site instead of noise from residential-use sources such as landscape maintenance and outdoor areas (e.g., pool and deck areas) that would occur on-site under the project. Nevertheless, similar to the project, noise attributable to on-site stationary-noise sources would be less than significant. The increase in traffic by 2,514 daily trip ends associated with the Alternative Use alternative would result in a proportionate increase in traffic related noise levels on surrounding roadways. However, roadway noise impacts associated with this alternative, as with the project, would be less than significant. This alternative also would also contribute to a less-than-significant cumulative impact to noise, similar to the project.

i. Transportation and Circulation

Short-term traffic impacts would occur during the construction phase for both the project and the Alternative Use alternative. The duration of construction activities under Alternative Use alternative is expected to be shorter, due to the reduction in floor area compared with the project. Construction impacts associated with grading and excavation for the subterranean parking structure would be similar to the project's grading and excavation impacts. The alternative and the project would exceed construction traffic significance thresholds; however, since construction impacts associated with above-ground structures would be incrementally less under the Alternative Use alternative, this alternative would reduce construction impacts associated with project construction. Traffic mitigation measures would reduce potential construction impacts to less than significant.

Although the reasonably foreseeable use of the project site is determined to be commercial development, the mix of uses on which a trip generation analysis would be based is unknown. It is reasonable to assume, however, that a large percentage of the development would

be retail and a smaller percentage would be committed to restaurants and miscellaneous uses. If the 102,250-square-foot commercial development were assumed to contain approximately 15,000 square feet of restaurant uses, 15,000 square feet of miscellaneous commercial uses, and 72,250 square feet of retail uses, the retail use alone would generate approximately 2,880 daily trips, 72 morning peak-hour trips, and 360 afternoon peak-hour trips. The restaurant component would generate approximately 1,950 daily trips, including 135 morning peak-hour trips and 220 afternoon peak-hour trips.[250] The total of these two components would be 4,830 daily trips (gross), 207 morning peak-hour trips, and 580 afternoon peak-hour trips. With the addition of miscellaneous uses, trips generation would be even higher. The Alternative Use alternative's gross daily trips would be considerably higher than the project's gross daily trips (2,326); the morning peak-hour trips would be similar to or higher than the project's morning peak-hour trips (185), and the afternoon peak hour would be much higher than the project's afternoon peak-hour trips (203). The Alternative Use is expected to have significant traffic impacts compared to adverse, but mitigable impacts attributable to the project. Mitigation measures, including street re-striping and potential removal of on-street parking spaces on Rose Avenue and Main Street being implemented by the proposed project, would be required as part of the alternative's traffic mitigation plan.

j. Parking

Under the Alternative Use alternative, existing transportation facilities would be replaced by approximately 102,250 square feet of commercial uses, which would be required to provide parking in accordance with the requirements of the LAMC and Venice Coastal Zone Specific Plan. Assuming a mix of 15,000 square feet of restaurant uses, 15,000 square feet of miscellaneous commercial uses, and 72,250 square feet of retail uses, the Alternative Use alternative would be required to provide approximately 449 spaces, in accordance with the LAMC.[251] Beach Impact Zone parking would also be required under the Venice Coastal Zone Specific Plan, based on ground-level floor area. A commercial land use (Alternative Use alternative) is expected to have greater lot coverage (building footprint) than a residential use, and could comprise up to 75 percent of the lot area. With a building footprint of 102,250 square feet, the Venice Coastal Zone Specific Plan would require as much as 160 Beach Impact Zone

[250] *As described in Section IV of this EIR, retail uses are expected to generate 40 trips per day/1,000 square feet of floor area; 1 trip per morning peak hour/1,000 square feet of floor area; and 5 trips per afternoon peak hour/1,000 square feet of floor area. Restaurant uses are expected to generate 130 trips per day/1,000 square feet of floor area; 9 morning peak-hour trips/1,000 square feet of floor area; and 11 afternoon peak-hour trips/1,000 square feet of floor area.*

[251] *LAMC parking for retail use would be 1 space/225 square feet of floor area (289 spaces); parking for restaurant use would be 1 space/150 square feet of floor area (100 spaces); and parking for miscellaneous commercial is estimated to be 1 space/250 square feet of floor area (60 spaces).*

parking spaces.[252] Total required parking under the LAMC and the Venice Coastal Zone Specific Plan would be approximately 609 spaces. This number, however, could increase or decrease, depending on the mix of commercial uses. For instance, if the percentage of restaurant uses increased, the number of parking spaces would increase at a rate of 1 space per 125 square feet of additional restaurant uses, twice the rate required for the retail and miscellaneous commercial uses.

It is reasonable to assume that the Alternative Use alternative would require approximately the same quantity of parking as under the project (a maximum of 676 spaces under the project), although more beach impact parking, relative to total parking, would be provided by the commercial alternative. More Beach Impact Zone parking (160 spaces under the Alternative Use alternative and 71 spaces under the project) would be provided under the Alternative Use alternative, but excess parking that could be used as fee parking for surrounding residents would not likely occur. However, on net, this alternative would have a slightly more beneficial impact relative to public parking than the project. Neither the project nor the Alternative Use alternative would exceed parking impact significance thresholds since all parking to meet the needs of the development would be provided.

As with the project, it is expected that the Alternative Use alternative would dedicate 16 feet along Sunset Avenue to provide for additional diagonal parking along the south side of Sunset Avenue. This dedication would provide public parking and offset any on-street parking spaces removed under street re-striping mitigation measures.

k. Utilities

(1) Water

The Alternative Use alternative would consist of approximately 102,250 square feet of commercial uses. Although the mix of commercial uses is unknown, for the purpose of analysis it can be reasonably assumed that the floor area would consist of approximately 72,250 square feet of retail uses, 15,000 square feet of restaurant uses, and 15,000 square feet of miscellaneous commercial uses. Using the same generation factors for equivalent commercial uses, as in the Water analysis in Section IV.K of this EIR, it is estimated that the Alternative Use alternative would generate a demand of 13,202 gallons per day (gpd).[253] With the deduction of the existing

[252] *The Venice Coastal Zone Specific Plan requires 1 beach impact parking space per 640 square feet of ground-level floor area (160 spaces).*

[253] *Retail use demand is estimated as 92 gpd/1,000 square feet (92 gpd x 72,250 sq.ft./1,000 = 6,647 gpd); restaurant use demand is estimated as 345 gpd/1,000 square feet (345 gpd x 15,000 sq.ft./1,000 = 5,175 gpd); and miscellaneous commercial demand is estimated as 92 gpd/1,000 square feet (92 gpd x 15,000 sq.ft./ 1,000 = 1,380 gpd).*

on-site water demand of 1,408 gallons per day (gpd), net water demand under the Alternative Use alternative would be approximately 11,794 gpd. This demand would be adjusted upward if the proportion of restaurant floor area were greater than estimated. Compared with the project's net water demand of 38,578 gpd, water demand would be less than one-third under the Alternative Use alternative. Although the implementation of the Alternative Use alternative would reduce the project's water demand, neither alternative would exceed thresholds of significance relative to the City's water supply and water distribution capacity. As such, both the project and the Alternative Use alternative impacts would be less than significant in relation to water supply. Mitigation through alternative development would not be required.

(2) Wastewater

The Alternative Use alternative would consist of approximately 102,250 square feet of commercial uses. Although the mix of commercial uses is unknown, for the purpose of analysis it can be reasonably assumed that the floor area would consist of approximately 72,250 square feet of retail uses, 15,000 square feet of restaurant uses, and 15,000 square feet of miscellaneous commercial uses. Using the same generation factors for equivalent commercial uses, as in the Wastewater analysis in Section IV.K of this EIR, it is estimated that the Alternative Use alternative would generate approximately 11,480 gallons per day (gpd).[254] With the deduction of the existing on-site wastewater generation of 1,224 gallons per day (gpd), net wastewater increase under the Alternative Use alternative would be approximately 10,256 gpd. This demand would be adjusted upward if the proportion of restaurant floor area were greater than estimated. Compared with the project's net wastewater increase of 33,546 gpd, wastewater generation would be less than one-third under the Alternative Use alternative. Although the implementation of the Alternative Use alternative would reduce the project's wastewater generation, neither alternative would exceed thresholds of significance relative to City of Los Angeles wastewater collection and treatment infrastructure. As such, both the project and the Alternative Use alternative impacts would be less than significant in relation to wastewater infrastructure. Mitigation through alternative development would not be required.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

While this alternative presumes the relocation of the existing Metro Division 6 operation, it cannot be determined whether it provides the land use and economic justification for doing so. In any case, the Alternative Use alternative would not meet the primary objective of the project

[254] *Retail wastewater generation is estimated as 80 gpd/1,000 square feet (80 gpd x 72,250 sq.ft./1,000 = 5,780 gpd); restaurant use demand is estimated as 300 gpd/1,000 square feet (300 gpd x 15,000 sq.ft./ 1,000 = 4,500 gpd); and miscellaneous commercial demand is estimated as 80 gpd/1,000 square feet (80 gpd x 15,000 sq.ft./1,000 = 1,200 gpd).*

to provide a mixed residential and commercial project, inclusive of affordable housing, or to provide a mix of market rate and affordable housing in response to projected population growth rates and demand for housing identified in the Venice Community Plan.

The Alternative Use alternative would also thwart the project's objective to promote the opportunity for people of varying socio-economic backgrounds to own quality housing in a dynamic, vibrant community.

In addition, the Alternative Use alternative would not avoid or substantially lessen the significant effects of the project as determined in the preceding analysis. Since the Alternative Use would not meet the project's basic objectives and would not reduce any identified significant impacts, this alternative would be an inappropriate development choice for the applicant, whose primary intent is to construct mixed multiple-family housing and community commercial space.

V. ALTERNATIVES TO THE PROPOSED PROJECT
H. ALTERNATIVE G:
SUNSET AVENUE SITE
REDUCED DENSITY PROJECT

1. DESCRIPTION OF THE ALTERNATIVE

The Reduced Density alternative assumes that the number of residential units would be reduced to 171 residential units. Under this alternative, the floor area of the residential component of the project would be reduced from approximately 270,000 square feet to approximately 204,500 square feet, a reduction of approximately 24 percent in residential floor area. The residential component of this alternative would have an FAR of approximately 1.5 in relation to the 3.13-acre site.[255] This alternative assumes that the commercial component of the project would remain at 10,000 square feet. Total floor combined floor area would be 214,500 square feet, a reduction in total floor area of approximately 23 percent. This alternative was selected for analysis in order to determine the extent to which project impacts would be reduced with a reduction in residential density. The proposed 171 residential units represent the number of units permitted under the designated CM zoning (1 unit/800 square feet of land area), exclusive of density bonuses. This alternative would include an affordable housing component, although the density bonus would not be implemented.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics

Visual Character. Under the Reduced Density alternative, the project floor area would be reduced to approximately 204,500 square feet of residential floor area, while commercial floor area would remain at 10,000 square feet. Total units would be reduced to 171. The visual character of the Reduced Density alternative would be consistent with visual character of the project, although opportunity for somewhat larger residential units exists. The aesthetic quality of the development is expected to typify modern residential design and would likely be architecturally interesting. Under the Aesthetics evaluation (Section IV.A of this EIR) the project is described as introducing substantial contrast relative to height and scale in the proximity of existing low-rise residential uses. The Reduced Density alternative, with the

[255] *FAR 1.5 x 136,343 square feet (3.13 acres) = approximately 204,500 square feet.*

development of 204,500 square feet instead of 270,000 square feet, could reduce the height of the residential structures in proximity to the adjacent residential streets, but would not necessarily do so. Thus, the Reduced Density alternative lessens impacts upon local aesthetic character, but would not necessarily avoid the project's significant impact on aesthetic character.

Views. The project site is not a valued view resource and views over the site are limited due to the flat terrain and intervening development. The project and the Reduced Density alternative would not impact valued viewsheds or exceed views and scenic resources thresholds of significance. In relation to views and scenic resources, both alternatives would be less than significant.

Illumination. Under the Reduced Density alternative, lighting would be similar to the project, in which lighting would be used to identify commercial uses along Main Street and to provide pedestrian security along the residential component of the project site. As with the project, exterior lighting would be directed on-site. Neither alternative would exceed light and glare impact thresholds, however, the Reduced Density alternative would likely have less visible illumination spilling from interior spaces, due to the potentially reduced height. Interior lighting would not be an environmental concern under either alternative. Both the project and the Reduced Density alternative would be less than significant in relation to light and glare.

Shading. The Reduced Density alternative could have lower building heights than the proposed project, and generate less off-site shading. Impacts with the proposed project fall at limited locations and limited times of the year. The proposed project's extreme shadow conditions are less than significant, as would be the case with the lesser impacts of the Reduced Density alternative.

b. Air Quality

The Reduced Density alternative would reduce the residential component of the project from 225 to 171 units. The 10,000 square feet of commercial floor area proposed under the project would be retained. During construction, the Reduced Density alternative would require similar amounts of site grading and excavation, but as a result of the reduction in building square footage, there would be a reduction in the overall amount of construction activity. However, on days of intensive construction activities, both the number of construction workers and heavy-duty construction equipment would be similar to the project. Regional mass daily emissions under the Reduced Density alternative would be similar to project emissions, because the duration (i.e., number of days) and not the intensity of construction activities would be reduced. As a result, impacts relative to NO_X regional mass emissions during site grading and excavation would be significant and unavoidable, as would this project alternative's contribution to a short-term significant and unavoidable cumulative impact to regional air quality during construction.

Also similar to the project, impacts relative to ROC, CO, PM_{10}, and SO_X regional mass emissions, as well as localized PM_{10}, CO, and NO_X concentrations during construction would be less than significant.

The Reduced Density alternative would also generate mobile- and stationary-source regional mass emissions during the long-term operations period. The change in development would reduce trip generation from 2,326 to 2,009 daily trips, which would result in a net decrease in long-term regional mass criteria pollutant emissions when compared to the project. Similar to the project, pollutant emissions would not exceed SCAQMD daily significance thresholds and impacts relative to mass regional emissions would be less than significant.

The decrease in traffic by 317 daily trip ends associated with the Reduced Density alternative would result in a proportionate decrease in localized CO emissions. As such, mobile source CO emissions associated with this alternative, as with the project, would result in a less-than-significant impact. Also similar to the project, impacts relative to localized NO_X and PM_{10} concentrations, as would long-term contributions to localized and regional cumulative impacts, during the long-term operations period would be less than significant.

c. Historic Resources

The Reduced Density alternative would require the demolition of existing on-site structures, including the concrete block west wall of the bus washing structure, upon which the Vietnam POW/MIA Memorial Mural is painted. This mural is considered an historical resource for the purposes of CEQA and its removal is considered an adverse, but not significant adverse impact relative to historical resources. As with the project, this alternative would be required to mitigate adverse impacts through photographic recordation of the mural and exploration of possible relocation of the wall. The impact of this alternative relative to historical resources would be similar to the project and would not reduce the impact on this historical resource. Neither the Reduced Density alternative nor the project would exceed a threshold of significance relative to historical resources.

d. Geology/Seismic Hazards

As described in Section IV.D, of this EIR, the project site has been identified as having potential risk of ground shaking and liquefaction. New development would be required to adhere to a significantly higher-than-code lateral design parameter to reduce potential structural damage. With the development of the site, the subterranean parking facility would create an impervious surface below the entire project site and reduce liquefaction potential. Compliance with site preparation requirements outlined in the geotechnical study would reduce the potential for the project to expose people to risk of injury, or result in substantial structural or

infrastructure damage from liquefaction to less-than-significant levels. Since the Reduced Density alternative would consist of the construction of a subterranean parking structure and new residential buildings, it would be subject to the same geologic impacts, structural design requirements, and site mitigation as the project. Since a two-level subterranean parking structure would be needed under this alternative, no substantial reduction in grading and excavation activities is anticipated. In relation to geologic hazards and seismic safety, both alternatives would have the same level of risk, although neither alternative would exceed thresholds of significance. Geotechnical impacts associated with excavation and grading would be similar under the Reduced Density alternative and the project, since both would require the construction of a large, two-level subterranean parking structure. Both the project and the Reduced Density alternative would be less than significant in relation to geologic and seismic hazards.

e. Hazardous Materials

The project site has been used as an industrial location for more than nine decades. Historical uses, such as a former power plant, rail yard, and unpaved vehicle maintenance indicate a strong potential for site contamination ranging from PCBs, petroleum derivatives, pesticides, and unidentified underground storage tanks (USTs). However, the Phase II and subsequent Streamlined Risk Assessment have determined that there are no significant levels of contamination, either in the soils or groundwater that would have a significant impact on human health or the environment.

Under the Reduced Density alternative, the site would be excavated for a two-level subterranean garage. As the site has officially received case closure as of August 10, 2004 by the Regional Water Quality Control Board, the appropriate removal and disposal of all soils and debris would have no significant impact. As such, this alternative would be similar to the project where impacts relative to hazardous materials would be less than significant under both alternatives.

f. Water Quality

The EIR does not evaluate water quality for the Sunset site, since it was determined in the Initial Study that the proposed project would improve surface water quality associated with runoff therefrom.

g. Land Use

In the EIR Land Use analysis (Section IV.G of this EIR), the density of the project was determined to be substantially consistent with governing land use plans and ordinances, which allow 25 percent density bonus for the inclusion of 10 percent very low income units within a

residential development. City of Los Angeles Ordinance No. 174995 (Mello Act) also allows an additional density bonus of 10 percent, subject to specific location criteria met by the project. Under the Reduced Density alternative, the alternative project would contain a maximum of 171 residential units and 10,000 square feet of commercial uses. Estimated residential floor area would be approximately 204,500 square feet, having an FAR of 1.5:1 (204,500 square feet/136,343 square feet) in relation to the entire project site. The total project floor area would have an FAR of approximately 1.57:1 (214,500 square feet/136,343 square feet). By comparison the residential component of the project would have an FAR of approximately 1.98:1 (270,000 square feet/136,343 square feet) and the entire project would have an FAR of 2.05 (280,000 square feet/136,343 square feet). The Reduced Density alternative would decrease the FAR of the residential component and the residential floor area by approximately 24 percent. Under the project, no significant land use impacts were attributed to floor area, since the increase is consistent with plan policies to encourage the provision of affordable housing. The floor area of the Reduced Project, however, is closer to the 1.5:1 FAR designated under the Venice Coastal Zone Specific Plan, and would, therefore, be closer to public perceptions of the intensity of development that is expected at the project site. If the project were a commercial or small manufacturing use, also permitted under the designated zoning, the 1.5:1 would be enforceable and appropriate in relation to the Specific Plan policy.

The Reduced Density alternative would be consistent with the CM zoning criteria for residential uses and would include very-low-income housing, fulfilling the existing land use plans and policies, including the Venice Coastal Zone Land Use Plan. Relative to land use policies, the land use impacts associated with the Reduced Density alternative would be less than the land use impacts of the project, and as with the proposed project, less than significant.

h. Noise

The Reduced Density alternative would require similar amounts of site grading and excavation, but as a result of the reduction in building square footage, there would be a decrease in the overall amount of construction activities that would occur on site. On days of intensive construction activities, both the number of construction workers and heavy-duty construction equipment would be similar to the project. Therefore, the maximum noise level from this alternative would be similar to the project, but the duration of construction noise would be reduced. As with the project, the Reduced Density alternative would generate noise levels during construction that are well above the surrounding ambient levels, and noise impacts during construction would be significant and unavoidable.

The Reduced Density alternative would generate mobile-source and on-site/stationary-source noise impacts, similar to the project. The same residential-use noise sources such as maintenance of landscape and outdoor areas (e.g., pool and deck areas) would be present on-site

under this alternative as well as the project. As such, similar to the project, noise attributable to on-site/stationary-noise sources would be less than significant. The decrease in traffic by 317 daily trip ends associated with the Reduced Project alternative would result in a proportionate decrease in traffic related noise levels on surrounding roadways. Therefore, roadway noise impacts associated with this alternative, as with the project, would be less than significant. This alternative also would contribute to a less-than-significant cumulative impact to noise, similar to the project.

i. Transportation and Circulation

Significant short-term traffic impacts, prior to mitigation, would occur during the construction phase for both the project and the Reduced Density alternative. The duration of construction activities under Reduced Density alternative would be incrementally shorter, since overall residential floor area would be reduced from 270,000 square feet to 204,500 square feet. Mitigation measures would include traffic control procedures be implemented for any activity that would potentially interfere with through access, including pavement construction and haul trucks/equipment turning onto or from the public street. With mitigation, impacts would be less than significant. Nonetheless, construction impacts would be incrementally less under the Reduced Density alternative.

As described in Section IV of this EIR, the project would generate a net increase of approximately 1,168 daily trips, 1,319 of which would be generated by the residential component of the project. Under the Reduced Density alternative, total residential trips would be reduced from 1,319 to 1,002, a decrease of 317 daily trips. In relation to project traffic, morning residential peak-hour trips would be reduced from 99 to 75, a decrease of 24 trips; and afternoon peak-hour trips would be reduced from 158 to 120, a decrease of 38 trips.[256] The commercial component of the project would remain the same under this alternative. The incremental decrease in daily and peak-hour trips under this alternative would reduce traffic impacts associated with the project. However, this incremental reduction would not eliminate significant pre-mitigation traffic impacts associated with the project. Mitigation measures, including the re-striping of several street sections and the removal of approximately four on-street parking spaces on Rose Avenue and approximately three on-street parking spaces on the west side of Main Street, would continue to be required. With the implementation of recommended mitigation measures, neither the project nor the Reduced Density alternative would exceed transportation thresholds of significance and both would be considered less than significant in relation to traffic impacts.

[256] *Average trip-generation factors for the residential component are 5.86 trips per unit/day, 0.44 trip per unit/morning peak hour, and 0.7 trip per unit/afternoon peak hour.*

j. Parking

The Reduced Density alternative would have a maximum residential component of 171 units. The commercial component would remain at 10,000 square feet, as under the project. Under the LAMC, the Reduced Density alternative would be required to provide 76 parking spaces for the proposed commercial component and to provide 385 parking spaces for the reduced residential component.[257] It is assumed that the building footprint would be similar under both alternatives, and that the Reduced Density Alternative would be required to provide approximately 68 parking spaces associated with the Beach Impact Zone, in accordance with the Venice Coastal Zone Specific Plan. Total required parking would be 529 spaces, 147 fewer spaces than under the project's maximum parking of 676 spaces. This alternative would not necessarily include the same provision for parking beyond the required spaces (44 spaces that could provide fee parking to surrounding residents). Although the construction of the subterranean structure could be modified to contain less parking than under the project, a two-level subterranean structure would still be required. Both alternatives would comply with total parking demand, and as such, would not exceed thresholds of significance relative to parking. As with the project, it is expected that the Reduced Density alternative would dedicate 16 feet along Sunset Avenue to provide for additional diagonal parking along the south side of Sunset Avenue. This dedication would provide public parking and offset any on-street parking spaces removed under street re-striping mitigation measures. Although parking demand for the project would be proportionately higher under the project, the impact of both alternatives would be similar in relation to CEQA significance thresholds. However, the proposed project includes the 44 excess spaces. Beach impact parking would be the same under both alternatives. Neither the project, nor the Reduced Density alternative, would exceed parking thresholds of significance and both would be considered less than significant in relation to parking impacts.

k. Utilities

(1) Water

The Reduced Density alternative would consist of 171 residential units and 10,000 square feet of commercial uses. Water demand associated with 171 residential units is estimated to be approximately 29,498 gallons per day (gpd).[258] The commercial component is estimated to generate a demand for 1,173 gpd of water. The project's 225 residential units are estimated to generate a demand for 38,813 gpd and the commercial component, the same for both projects, is estimated to generate a demand for 1,173 gpd. Due to the reduction in residential units, the

[257] *The LAMC requires 2.25 parking spaces per market-rate residential unit (171 x 2.25 = 385).*

[258] *Residential water demand is estimated to be 172.5 gpd/dwelling unit (172.5 gpd x 171 units = 29,498 gpd).*

Reduced Density alternative is estimated to require 9,315 gpd less water than under the project. The net water demand of the Reduced Density alternative is estimated to be 29,263 gpd (deducting existing on-site water use of 1,408 gpd) and net water demand of the project is estimated to be 38,578 gpd. Although the implementation of the Reduced Density alternative would reduce the project's water demand, neither alternative would exceed thresholds of significance relative to City of Los Angeles water supply and water distribution capacity. As such, both the project and the Reduced Density alternative would be less than significant in relation to water supply.

(2) Wastewater

The Reduced Density alternative would consist of 171 residential units and 10,000 square feet of commercial uses. Wastewater generation associated with 171 residential units is estimated to be approximately 25,650 gallons per day (gpd).[259] The commercial component is estimated to generate approximately 1,020 gpd of wastewater. The project's 225 residential units are estimated to generate approximately 33,750 gpd and the commercial component, the same for both projects, is estimated to generate approximately 1,020 gpd of wastewater. Due to the reduction in residential units, the Reduced Density alternative is estimated to generate 8,100 gpd less wastewater than under the project. Although the implementation of the Reduced Density alternative would reduce the project's wastewater generation, neither alternative would exceed thresholds of significance relative to City of Los Angeles wastewater collection and treatment infrastructure. As such, both the project and the Reduced Density alternative would be less than significant in relation to wastewater.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Reduced Density alternative would not meet the primary objectives of the project to generate the land use and economic justification to relocate the Metro Division 6 bus operations and maintenance facility and to provide a mixed residential and commercial project, inclusive of affordable housing. In addition it would not meet the project's objective of providing a mix of affordable and market rate housing in response to projected population growth rates and demand for housing identified in the Venice Community Plan.

As indicated through the comparative analysis presented previously, the Reduced Density alternative would not avoid or substantially lessen the significant effects of the project. The Reduced Density alternative, however, would result in a smaller floor area ratio (FAR) than under the project. Although the project's FAR ratio is not identified as significant, since the

[259] *Residential wastewater is estimated as 150 gpd/dwelling unit (150 gpd x 171 units = 25,650 gpd).*

permissibility of residential development is according to the total number of units, not the floor area of the units. The floor area of the Reduced Density alternative, however, is closer to the 1.5:1 FAR designated under the Venice Coastal Zone Specific Plan, and would, therefore, be closer to public perceptions of the intensity of development that is expected at the project site. If the project were a commercial or small manufacturing use, as also permitted under the designated zoning, the 1.5:1 would be enforceable and appropriate in relation to the Specific Plan policy.

Finally, this alternative would not maximize the value of the property as it would reduce the amount of residential development developable thereon, and value is all but directly variable with the number or residential dwelling units.

V. ALTERNATIVES TO THE PROPOSED PROJECT
I. ALTERNATIVE H:
SUNSET AVENUE SITE
REDUCED HEIGHT

1. DESCRIPTION OF THE ALTERNATIVE

The Reduced Height alternative assumes that the project's height would be reduced along the frontages of Thornton Place and Sunset Avenue, in relation to existing development plans. This reduction would be achieved by eliminating the first row of fourth-floor residential units facing those streets. Under this alternative, the building heights along the street frontages would be similar to the project's building heights along Pacific Avenue and Main Street. This height reduction would require the removal from the building plans of eight fourth-story units along Thornton Place and seven fourth-story units along Sunset Avenue. While some or all of the discussed units could be relocated in the site's interior, it is assumed that this does not occur in the following discussion. With the removal of these fifteen units, total development is expected to be 10,000 square feet of commercial uses and 210 residential units and approximately 254,000 square feet of residential floor area. The effect of the reduction in building heights along the street frontages would be the relegation of the project's fourth story components to the central portion of the property. In addition, the resulting height of the project along the street frontages would be three stories, similar to the height requirements of the Venice Coastal Specific Plan (30 feet for flat roofs, 35 feet for varied roofs). The height reduction would address mass and scale issues associated with the juxtaposition of the project with one-three-story residential uses across the narrow Thornton Place and Sunset Avenue. This alternative was selected for analysis to assess the reduction this design would have on aesthetic impacts associated with the project's substantial contrast with adjacent residential land uses.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics

Visual Character. As described in the Aesthetics evaluation (Section IV of this EIR), the project would create a substantial contrast between the four-story project and low-rise residential uses directly across narrow residential lanes separating the project from existing residential uses. The project was found to be significant in relation to aesthetic character, as defined by a threshold of significance addressing the potential for a project to detract from the existing style or image of the area due to density, height, bulk, or setbacks.

The Reduced Height alternative would eliminate the first tier of residential units at the fourth-story level along the Sunset Avenue and Thornton Place frontages. As such, the exterior facades of the Reduced Density alternative would be three stories adjacent to the street frontages, stepping back to four and five stories behind the first tier of development. Since this height reduction would occur along the narrow lanes separating the project from adjacent residential uses, the appearance of height and bulk from adjacent residences across these streets, as well as from the perspective of pedestrians, would be reduced. As such, the Reduced Height alternative would reduce the project's impact relative to aesthetic character to a less-than-significant level.

Views. The project site is not a valued view resource and views over the site are limited due to the flat terrain and intervening development. Neither of the alternatives would exceed thresholds of significance relative to valued viewsheds and both alternatives would be less than significant in relation to views and scenic resources.

Illumination. Under the Reduced Height alternative, lighting would be similar to the project, in which lighting would be used to identify commercial uses along Main Street and to provide pedestrian security along the residential component of the project site. As with the project, exterior lighting would be directed on-site. Neither alternative would exceed light and glare impact thresholds, however, the alternative would likely have less visible illumination of interior spaces, due to the setback of the fourth floor level from the street frontages. Interior lighting associated with the project is not considered an environmental concern, however, and this alternative would not serve to substantially reduce the lighting effects of the project. Neither alternative would exceed light and glare significance thresholds and both alternatives would be deemed less than significant in relation to light and glare impacts.

Shading. The Reduced Height alternative would have lower building heights than the proposed project, and generate less off-site shading. Impacts with the proposed project fall at limited locations and limited times of the year. The proposed project's extreme shadow conditions are less than significant, as would be the cases with the lesser impacts of the Reduced Height alternative.

b. Air Quality

The Reduced Height alternative would reduce the residential component of the project as proposed from 225 to 210 units. The 10,000 square feet of commercial frontage proposed under the project would be retained. During construction, the Reduced Height alternative would require similar amounts of site grading and excavation activities, but as a result of the reduction in building square footage, there would also be a reduction in the overall amount of construction activity. However, on days of intensive construction activities, both the number of construction workers and heavy-duty construction equipment would be similar to the project. Regional mass

daily emissions under the Reduced Height alternative would be similar to project emissions, because the duration (i.e., number of days) and not the intensity of construction activities would be reduced. As a result, impacts relative to NO_X regional mass emissions during site grading and excavation would be significant and unavoidable, as would this project alternative's contribution to a short-term significant and unavoidable cumulative impact to regional air quality during construction. Also similar to the project, impacts relative to ROC, CO, PM_{10}, and SO_X regional mass emissions, as well as localized PM_{10}, CO and NO_X concentrations during construction would be less than significant.

The Reduced Height alternative would also generate mobile-source and stationary-source regional mass emissions during the long-term operations period. The change in development would reduce gross trip generation from 2,326 to 2,237 daily trips, which would result in a net decrease in long-term mass regional criteria pollutant emissions when compared to the project. Similar to the project, pollutant emissions would not exceed SCAQMD daily significance thresholds and impacts relative to mass regional emissions would be less than significant.

The decrease in traffic by 89 daily trip ends associated with the Reduced Height alternative would result in a proportionate decrease in localized CO emissions. As such, mobile source CO emissions associated with this alternative, as with the project, would result in a less-than-significant impact. Also similar to the project, impacts relative to localized NO_X and PM_{10} concentrations, as would long-term contributions to localized and regional cumulative impacts, during the long-term operations period would be less than significant.

c. Historic Resources

The Reduced Height alternative would require the demolition of existing on-site structures, including the concrete block west wall of the bus washing structure, upon which the Vietnam POW/MIA Memorial Mural is painted. This mural is considered an historical resource for the purposes of CEQA and its removal is considered an adverse but not significant adverse impact relative to historical resources. As with the project, this alternative would be required to mitigate adverse impacts through photographic recordation and exploration of possible relocation of the mural. The impact of this alternative relative to historical resources would be similar to the project. Under both alternatives, impacts relative to an historical resource would be less than significant.

d. Geology/Seismic Hazards

As described in Section IV of this EIR, the project site been identified as having potential risk of ground shaking and liquefaction. New development would be required to adhere to a significantly higher-than-code lateral design parameter to reduce potential structural damage.

With the development of the site, the subterranean parking facility would create an impervious surface below the entire project site and reduce liquefaction potential. Compliance with site preparation guidelines outlined in the geotechnical study would reduce the potential for the project to expose people to risk of injury, or result in substantial structural or infrastructure damage from liquefaction to less-than-significant levels. Since the Reduced Height alternative would consist of the construction of a subterranean parking structure and new residential buildings, it would be subject to the same geologic impacts, structural design requirements, and site mitigation as the project. In relation to geologic hazards and seismic safety, both alternatives would have the same level of risk, although neither alternative would exceed thresholds of significance. Since the level of risk would be the same under both alternatives, the Reduced Height alternative would not reduce the project's impacts relative to geology and seismic hazards.

e. Hazardous Materials

The project site has been used as a transportation infrastructural facility for more than nine decades. Historical uses, such as a former power plant, rail yard, and unpaved vehicle maintenance indicate a strong potential for site contamination ranging from PCBs, petroleum derivatives, pesticides, and unidentified underground storage tanks (USTs). However, the Phase II and subsequent Streamlined Risk Assessment have determined that there are no significant levels of contamination, either in the soils or groundwater that would have a significant impact on human health or the environment.

Under the Reduced Height alternative, the site would be excavated for a two-story subterranean garage. As the site has officially received case closure as of August 10, 2004 by the Regional Water Quality Control Board, the appropriate removal and disposal of all soils and debris would have no significant impact. As such, this alternative would be similar to the project where impacts relative to hazardous materials would be less than significant under both alternatives.

f. Water Quality

The EIR does not evaluate water quality for the Sunset site, since it was determined in the Initial Study that the proposed project would improve surface water quality associated with runoff therefrom.

g. Land Use

The Reduced Height alternative would contain approximately 210 units, including very-low-income units and, as with the project, would be consistent with the governing land use plans

and policies. The Venice Local Coastal Program Land Use Plan (LUP) allows a 25 percent density bonus for the inclusion of 10 percent very low income units within a residential development and City of Los Angeles Ordinance No. 174995 (Mello Act) allows an additional density bonus of 10 percent, subject to specific location criteria met by the project. At 210 units, the Reduced Height alternative would be less than the 231 units allowed under the affordable housing density bonuses. Although height bonuses intended to encourage affordable housing are not specified, they are implied since additional affordable dwelling units must be accommodated within the same buildable area as the maximum number of units permitted by right in a development containing very-low-income units.

The Reduced Height alternative would eliminate the fourth floor units abutting the Thornton Place and Sunset Avenue frontages. The design effect is that the fourth-story component would be set-back from the frontages of Thornton Place and Sunset Avenue, and the exterior walls would rise to three stories, rather than four stories, along these frontages. Overall residential floor area would be reduced to approximately 254,000 square feet. Neither the project nor the Reduced Height alternative would exceed thresholds of significance relative to compliance with regulatory plans and policies.

The Land Use analysis (Section IV of this EIR), describes the project as an infill project which places primarily residential uses among existing and anticipated residential uses, and commercial uses along Main Street, a mixed commercial/residential corridor. The Draft EIR Land Use analysis notes that the project would exhibit greater density than the existing adjacent residential neighborhood. This alternative's general uses, and their relationship to their surroundings would not be substantially altered with this alternative. The reduction in heights would reduce potential impact on aesthetics as discussed above. Neither the project, nor the Reduced Height alternative, would exceed land use thresholds of significance relative to community and neighborhood disruption, division, or isolation.

h. Noise

The Reduced Height alternative would require similar amounts of site grading and excavation activity, but as a result of the reduction in building square footage, there would be a decrease in the overall amount of construction activities that would occur on site. On days of intensive construction activities, both the number of construction workers and heavy-duty construction equipment would be similar as the project. Therefore, the maximum noise level from this alternative would be similar to the project, but the duration of construction noise would be reduced. As with the project, the Reduced Height alternative would generate noise levels during construction that are well above the surrounding ambient levels, and noise impacts during construction would be significant and unavoidable.

The Reduced Height alternative would generate mobile-source and on-site/stationary-source noise impacts, similar to the project. The same residential-use noise sources such as lawn maintenance and outdoor gathering areas (e.g., pool and deck areas) would be present on-site under this alternative as well as the project. As such, similar to the project, noise attributable to on-site/stationary-noise would be less than significant. The decrease in traffic by 77 daily trip ends associated with the Reduced Height alternative would result in a proportionate decrease in traffic related noise levels on surrounding roadways. Therefore, roadway noise impacts associated with this alternative, as with the project, would be less than significant. This alternative also would contribute to a less-than-significant cumulative impact to noise, similar to the project.

i. Transportation and Circulation

Significant, short-term traffic impacts, prior to mitigation, would occur during the construction phase for both the project and the Reduced Height alternative. The duration of construction activities under Reduced Height alternative would be similar, since overall residential floor area would be only slightly reduced from 270,000 square feet to 254,000 square feet. Mitigation measures would require traffic control procedures be implemented for any activity that would potentially interfere with through access, including pavement construction and haul trucks/equipment turning onto or from the public street. With mitigation, neither alternative would exceed construction traffic significance thresholds. Construction impacts would be incrementally less under the Reduced Height alternative.

As described in Section IV of this EIR, the project would generate a gross increase of approximately 2,326 daily trips (1,168 net trips), 1,319 of which would be generated by the residential component of the project. Under the Reduced Project alternative, total residential trips would be reduced from 1,319 to 1,230, a decrease of 89 daily trips. Morning residential peak-hour trips would be reduced from 99 to 93 trips and afternoon peak-hour trips would be reduced from 158 to 148 trips.[260] The commercial component of the project would remain the same under this alternative. The incremental decrease in daily and peak-hour trips under this alternative would slightly reduce traffic impacts associated with the project. However, trip reduction would not eliminate significant traffic impacts. Traffic mitigation measures, including the re-striping of several street sections and the removal of approximately four on-street parking spaces on Rose Avenue and approximately three on-street parking spaces on the west side of Main Street, would continue to be required.

[260] *Average trip-generation factors for the residential component are 5.86 trips per unit/day, 0.44 trip per unit/morning peak hour, and 0.7 trip per unit/afternoon peak hour.*

j. Parking

The Reduced Height alternative would have a maximum residential component of 210 units, including 17 very-low-income units. The commercial component would remain at 10,000 square feet, as under the project. Under the LAMC, the Reduced Height alternative would be required to provide 76 parking spaces for the proposed commercial component and to provide 456 parking spaces for the reduced residential component.[261] It is assumed that the building footprint would be similar to the project's and that, as with the project, the Reduced Height Alternative would be required to provide approximately 71 Beach Impact Zone parking spaces, in accordance with the Venice Coastal Zone Specific Plan. Total maximum required parking would be 603 spaces, 73 fewer spaces than under the project's maximum parking of 676 spaces. Although the construction of the subterranean structure could be modified to contain less parking than under the project, a two-level subterranean structure would still be required, and some or all of the project's 44 parking spaces that are beyond code requirements could be included. Both alternatives would comply with total parking demand, and as such, would not exceed thresholds of significance relative to parking. As with the project, it is expected that the Reduced Height alternative would dedicate 16 feet along Sunset Avenue to provide for additional angled parking along the south side of Sunset Avenue. This dedication would provide public parking and offset any on-street parking spaces removed under street re-striping mitigation measures. Although parking demand for the project would be proportionately higher under the Reduced Height alternative, the impact of both alternatives would be similar in relation to CEQA significance thresholds. Beach impact parking would be similar under both alternatives.

k. Utilities

(1) Water

The Reduced Height alternative would consist of 210 residential units and 10,000 square feet of commercial uses. Water demand associated with 210 residential units is estimated to be approximately 36,225 gallons per day (gpd).[262] The commercial component is estimated to generate a demand for 1,173 gpd of water. The project's 225 residential units are estimated to generate a demand for 38,813 gpd and the commercial component, the same for both projects, is estimated to generate a demand for 1,173 gpd. Due to the reduction in residential units, the Reduced Height alternative is estimated require 2,588 gpd less water than under the project. The Reduced Height alternative's net water demand is estimated to be 35,990 gpd (deducting existing

[261] *The LAMC requires 2.25 parking spaces per market-rate residential unit (195 x 2.25 spaces = 439 spaces) and 1.0 space per very-low-income unit (17 x 1.00 = 17 spaces).*

[262] *Residential water demand is estimated as 172.5gpd/dwelling unit (172.5 gpd x 210 units = 36,225 gpd).*

on-site water use of 1,408 gpd) and the project's net water demand is estimated to be 38,578 gpd. Although the implementation of the Reduced Height alternative would reduce the project's water demand, neither alternative would exceed thresholds of significance relative to City of Los Angeles water supplies and water distribution capacity. As such, both the project and the Reduced Height would be less than significant in relation to water supply.

(2) Wastewater

The Reduced Height alternative would consist of 210 residential units and 10,000 square feet of commercial uses. Wastewater generation associated with 210 residential units is estimated to be approximately 31,500 gallons per day (gpd).[263] The commercial component is estimated to generate approximately 1,020 gpd of wastewater. The project's 225 residential units are estimated to generate approximately 33,750 gpd and the commercial component, the same for both projects, is estimated to generate approximately 1,020 gpd of wastewater. Due to the reduction in residential units, the Reduced Height alternative is estimated to generate approximately 2,250 gpd less wastewater than under the project. Although the implementation of the Reduced Height alternative would reduce the project's wastewater generation, neither alternative would exceed thresholds of significance relative to City of Los Angeles wastewater collection and treatment infrastructure. As such, both the project and the Reduced Height alternative would be less than significant in relation to wastewater.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Reduced Height alternative would meet most of the primary objectives of the project to provide a mixed residential and commercial project, inclusive of affordable housing, though to a lesser degree than the proposed project. The consequence of reducing the relative satisfaction of basic project objectives is unknown, and, in particular, it is not known whether this alternative would provide sufficient land use and economic justification to relocate Metro's existing Division 6 facility. Similarly, the Reduced Height alternative would, to a reduced extent, meet the project's objective to transform an unusually configured and inappropriately utilized parcel to provide a mix of market-rate and affordable housing in response to projected population growth rates and demand for housing identified in the Venice Community Plan, and to a lesser degree, would promote the opportunity for people of varying socio-economic backgrounds to own quality housing in a dynamic, vibrant community.

[263] *Residential wastewater generation is estimated to be 150 gpd/dwelling unit (150 gpd x210 units = 31,500 gpd).*

The Reduced Height alternative would provide a modern residential/commercial use that would be complimentary with the mix of existing and projected residential and commercial uses in the area. Since this alternative would not allow the maximum amount of housing that can be supported by the local environment, the Reduced Height alternative would not maximize the value of the existing property through the replacement of an obsolete industrial facility.

In addition, the project was found to be significant in relation to aesthetic character, as defined by a threshold of significance addressing the potential for a project to detract from the existing style or image of the area due to density, height, bulk, or setbacks. This aesthetic character impact would be reduced to a less-than-significant level under the Reduced Height alternative.

V. ALTERNATIVES TO THE PROPOSED PROJECT
J. OTHER ALTERNATIVES CONSIDERED

In accordance with CEQA Guidelines Section 15126.6(c), an EIR must identify any alternatives that were considered for analysis but rejected as infeasible, and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failure to meet most of the basic project objectives (outlined above), the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

West Los Angeles Transportation Facility. In accordance with CEQA Guidelines, numerous alternatives were considered for the Transportation Facility site, but rejected from further analysis. These alternatives involved use of the project site for alternate uses both developed and undeveloped. Use of the site for light industrial/manufacturing uses was evaluated as part of the No Project/Community Plan Compliant alternative presented above. Development of the site with residential and/or commercial development would be inconsistent with all of the applicant's basic objectives, which include the objective to improve transit service in all Central and Westside communities by relieving overcrowding at Metro divisions serving the Central and Westside, and with Metro's mission, which is the provision of public transportation. Further, the project site is located within an MR (Restricted Industrial) zone and surrounded by predominantly industrial uses with some commercial uses. Thus, development of residential uses within the site would not be consistent with the zoning for the site and would not be compatible with surrounding uses. Furthermore, development of the site with commercial/retail uses would be expected to result in greater environmental impacts (e.g., impacts associated with peak-hour traffic) when compared with the proposed use of the site as a Transportation Facility. In addition, use of the site for residential or commercial/retail uses would not be consistent with Community Plan policies to support the continued use of industrial sites. Finally, one of the primary purposes of an alternatives analysis is to identify whether an alternative can reduce the significant and unavoidable impacts of a proposed project. The only potentially significant and unavoidable impact associated with the West Los Angeles Transportation Facility is associated with air quality emissions during construction activities. Such short-term impacts would likely occur under any alternative development scenario for the site. Thus, development of the site with an alternative use was also rejected on this basis.

The use of the Transportation Facility site for active and/or passive open space activity was also considered. Again such use of the site would be inconsistent with Metro's objectives and mission. No known entities have expressed an interest in acquiring the site for public use,

and, in fact, efforts to improve park and open space uses in the area are currently being pursued by the Baldwin Hills Conservancy in the nearby Baldwin Hills area.

Sunset Avenue Project. Alternatives considered, but rejected, for the Sunset Avenue site include another mixed-use project as a reasonably foreseeable project under the existing land use designation. This alternative, however, was not selected for analysis since it would be too similar to the project to allow for meaningful comparison. As such, an alternative that would be both foreseeable under the existing land use designation and dissimilar to the project was selected. As described above, this Alternative assumed development of the site with neighborhood commercial/retail uses. Also presented above is a reduced intensity alternative with a reduction of residential uses. Although the site is currently zoned for industrial uses, development of the site with another industrial use was rejected based on incompatibility with surrounding residential uses and inconsistency with the intended direction set forth in the Venice Community Plan. Furthermore, with the exception of the potentially significant aesthetic impact associated with the project, all of the potentially significant and unavoidable impacts associated with the Sunset Avenue are associated with construction. Such short-term impacts would also be expected of most alternative development scenarios for the site. Thus, development of the site with an alternative use other than the uses set forth in the Reduced Intensity and Alternative Use Alternatives presented above was also rejected on this basis.

An active or passive open space alternative was also considered for this site. This alternative was rejected due to the long-term infrastructure use of the property and extensive remediation, which would be better accomplished through excavation for a proposed development. In addition, as with the Transportation Facility, no public or private entity has expressed interest in acquisition of this site for open space and, as such, an active or passive open space use would not be feasible.

V. ALTERNATIVES TO THE PROPOSED PROJECT
K. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Of the alternatives analyzed in this EIR, two must be selected as environmentally superior, due to the dual projects. In the case of both development sites, the Transportation Facility No Project/No Build Alternative and the Sunset Site No Project/No Build Alternative would be the environmentally superior alternatives, since they would avoid or reduce significant impacts associated with air quality, traffic, scale/height, density, and historic resources. For instance, if no development occurred at the Sunset Avenue site, the historical impact attributed to the demolition of the POW/MIA wall at the existing District 6 facility would not occur. At the same time, it should be noted that the No Project alternatives would contribute to some adverse impacts associated with maintaining the current site uses. The Sunset Avenue site would continue to operate as a transportation facility. It would be necessary to increase site operations and hours of activity and to increase the non-revenue miles of travel for buses that would be avoided with the implementation of the proposed project.

The No Project/No Build Alternatives, however, would not meet the underlying objectives of the projects since they would inhibit and delay the Metro's ability to meet its objectives to replace the existing, obsolete bus operations facility with a modern facility and to expand service from a more centralized location in response to growing Westside and Central ridership, reduce costs, reduce the need to operate Westside routes out of other sectors, and move forward with a CNG fueling facility and other goals. The No Project/No Build Alternative would also not meet the primary objective of the Sunset Avenue developer, to transform an unusually configured and historically outdated site use and to provide a mix of market-rate and affordable housing in response to projected population growth rates and demand for housing identified in the Venice Community Plan.

The CEQA Guidelines (Section 15126.6) require that, if a no project alternative is determined to be the environmentally superior alternative, an environmentally superior alternative must also be identified among the remaining alternatives.

At the Transportation Facility site, there are no significant impacts and therefore none of the alternatives are environmentally superior in that they eliminate a significant impact. Beyond this, the impacts of all the alternatives other than the No Project/No Build alternative would have over-all impact profiles that are somewhat similar to that of the proposed project. Impacts of the Community Plan/Light-Industrial Project alternative are similar to those of the proposed project without allowing the attainment of any project objectives. The Alternative Location alternative

would not be environmentally superior, as it is unlikely that a site could be found that would be as environmentally well-suited for the proposed use as the project site. Further, any site within the intended service area would have a similar set of urban conditions. The Reduced Project would reduce the amount of on-site activity and related number of buses utilizing the site, therefore reducing direct project impacts. However, the Reduced Project would not necessarily be environmentally superior to the proposed project since it would generate its own deleterious effect in relation to air quality. Specifically, the shuttling of 25 empty buses between districts for the purpose of housing, service, and refueling would potentially add hundreds of miles a day and contribute to composite air pollution. However, since the Reduced Project would lessen some direct project impacts, it has been identified as the environmentally superior alternative of the alternatives analyzed. However, the Transportation Facility project would be considered environmentally preferable to the environmentally superior alternative.

For the Sunset Avenue project, the Reduced Height alternative would reduce the project's significant aesthetic impact, as well as negligibly reduce other non-significant impacts associated with the number of units on site; (e.g., there would be slightly less traffic generation). The Reduced Density alternative would reduce impacts overall to a slightly greater extent than would the Reduced Height alternative. However, reducing density *per se* would not necessarily reduce project heights along Thornton Place and Sunset Avenue, and thus may not avoid the project's significant impact on aesthetic character. Further, as with the Reduced Height alternative, the Reduced Density alternative would not mitigate significant short-term construction impacts on air quality and noise. Therefore, for the Sunset Avenue project, the Reduced Height alternative is considered the environmentally superior alternative.

VI. Other Environmental Considerations

VI. OTHER ENVIRONMENTAL CONSIDERATIONS
A. SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. Following is a summary of the impacts associated with the Sunset Avenue Project that were concluded to be significant and unavoidable. Impacts and related mitigation measures associated with both project sites are described in detail in Chapter IV, Environmental Impact Analysis, of this EIR.

1. WEST LOS ANGELES TRANSPORTATION FACILITY

With the implementation of the proposed mitigation measures, no significant and unavoidable impacts are expected to occur.

2. SUNSET AVENUE PROJECT

a. Aesthetics

Should Mitigation Measure IV.A-1 not be feasible to implement, development of the residential component of the project, as currently proposed, would result in substantial change to the aesthetic character of the surrounding area. In particular, the proposed building height of 45 to 50 feet for those residential structures fronting Sunset Avenue and Thornton Place would create significant and unavoidable aesthetic impacts to existing residential uses on these streets that are located directly across from the proposed project. In considering the feasibility of the proposed mitigation measure, the benefits of such mitigation should be weighed against this project's potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking. Please also see Section IV.A, Aesthetics, for additional discussion of this topic.

b. Air Quality

Similar to the West Los Angeles Transportation site, although implementation of the mitigation measures described in Section IV.B, Air Quality, of this EIR would reduce construction air quality impacts, activities related to construction of the project would continue to

exceed the South Coast Air Quality Management District (SCAQMD) daily emission thresholds for regional NO_X. As such, construction of the Sunset Avenue Project would have a significant and unavoidable impact on regional air quality. This impact, however, would be relatively short-term.

In addition, during the period of concurrent construction activity at the Sunset Avenue site and ongoing operations at the West Los Angeles Transportation Facility, composite NO_X emissions would exceed SCAQMD daily emission thresholds for regional NO_X. These combined regional air quality impacts would be significant and unavoidable. These impacts would also be intermittent and short-term.

No significant increases in pollutant emissions are anticipated during the operational phase of the project. Please refer to Section IV.B., Air Quality, of this EIR for further discussion of this topic.

c. Noise

Noise impacts from construction would exceed the 5-dBA significance criterion at residential properties located immediately adjacent to the project site even with implementation of Mitigation Measures Sunset-H.1 through Sunset-H.5. As such, short-term noise impacts during project construction would be significant and unavoidable. Please refer to Section IV.H., Noise, of this EIR for further discussion of this topic.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS
B. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

In addition to identification of the project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines also requires that the reasons why the project is being proposed, notwithstanding these impacts, be described. The underlying purpose of the proposed projects is to provide two projects that would allow each of the project sites to be put to improved uses in a coordinated manner that would facilitate the success of both projects. Towards this end, the Transportation Facility site would be developed with transportation facilities that would serve regional public transportation needs, and the Sunset Avenue site would be developed with mixed residential and commercial development. The specific reasons for the individual components of the proposed projects are grounded in a comprehensive listing of project objectives for the West Los Angeles Transportation Facility and Sunset Avenue Project included in Chapter II, Project Description, of this EIR.

1. WEST LOS ANGELES TRANSPORTATION FACILITY

In general, the West Los Angeles Transportation Facility would replace an obsolete bus operations facility with a modernized new facility that better meets Metro's needs. The proposed location would help to relieve overcrowding at Metro's divisions serving the Westside and Central areas of Los Angeles, thus improving transit service in all Westside communities. The proposed project would also allow Metro to develop a modernized bus operations facility and expand service from a more centralized location to serve the central and western areas of Los Angeles County. This more centralized location would reduce the amount of overall travel time and distance between the bus operations facility and bus routes. The project site would also have utility infrastructure to support a clean-fuel compressed natural gas (CNG) fueling station, which would facilitate the conversion of older diesel buses to CNG buses. Other components of the proposed transportation center include expanded maintenance facilities, an administration building, fare retrieval vault houses, a tire shop, and bus and employee parking. The new location and improved facilities would result in reduced operating costs for the provision of public transportation. Furthermore, the light industrial and commercial development adjacent to the project site would be more compatible with uses associated with the transportation center when compared to the present location of this facility, which is surrounded by residential development.

In addition, a No Project/No Build Alternative, a No Project/Community Plan Alternative, Reduced Project Alternative, and Alternative Location Alternative were considered in Chapter V, Alternatives to the Proposed Project, of this EIR. None of the proposed alternatives would achieve the objectives of Metro to the extent of the proposed project. The No Project/No Build Alternative and No Project/Community Plan Alternative would preclude the development of modern facility at this location that would be more centrally located in response to growing Westside and Central ridership. The Reduced Project Alternative would reduce the number of buses from 175 to 150. This reduction in fleet size would not improve the efficiency of transportation service delivery, reduce pressures at other overburdened facilities, or reduce the need to operate the Westside and Central routes out of other sectors. The Alternative Location Alternative would delay the development of the West Los Angeles Transportation Facility, since the present location is the result of several years of site search and meets Metro's criteria for acquisition, including a centralized location and proximity to major arterials.

2. SUNSET AVENUE PROJECT

The Sunset Avenue Project would replace the existing bus operations facility with a mixed residential and commercial project that is more compatible with surrounding residential uses and would provide complimentary neighborhood serving uses. The residential component includes 225 dwelling units, a portion of which would be designated for affordable housing. In addition, approximately 10,000 square feet of retail space is proposed in a ground floor setting to be occupied by café, retail, and health club uses. The provision of affordable housing and mixed use would be consistent with policies of the Framework Element, Venice Local Coastal Program Land Use Plan, and the Venice Community Plan. Further, the project would provide 115 parking spaces beyond the project's needs that would serve the surrounding community: 71 parking spaces per Beach Impact Zone requirements, and 44 additional parking spaces that could provide fee parking for surrounding residents.

In addition, a No Project/No Build Alternative, an Alternative Use Alternative, Reduced Density Alternative, and Reduced Height Alternative were considered in Chapter V, Alternatives to the Proposed Project, of this EIR. Among those alternatives, the No Project/No Build Alternative would reduce the significant unavoidable air quality and noise impacts during construction, and aesthetic impacts compared to the proposed project. The Reduced Height Alternative and Alternative Use Alternative would reduce the significant unavoidable aesthetic impact identified for the proposed project (as summarized in Section VI.A., above). Additionally, the Reduced Height Alternative would achieve most of the objectives of the proposed project. The No Project/No Build Alternative would not provide a mixed residential and commercial project and the incongruously located industrial use would remain in its current location. The Alternative Use Alternative would develop the site as a commercial use. This

would also preclude the development of a mixed residential and commercial project to meet projected housing demand. The Reduced Project Alternative would reduce the number of dwelling units from 225 to 171 while retaining the 10,000 sq. ft. commercial use. This alternative would not so fully provide a mix of affordable and market rate housing to meet projected housing demand. This alternative could, but would not necessarily, eliminate the project's significant impact on aesthetic character. The Reduced Height Alternative would provide a mixed residential and commercial use, including affordable housing to more fully meet projected housing demand. The Reduced Height Alternative would reduce the identified significant impact associated with aesthetic character.

The significant unavoidable noise and air quality impacts that are anticipated to result from the proposed project, with the exception of the potential aesthetic impacts related to building height along Sunset Avenue and Thornton Place, are short-term construction effects.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS
C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines requires that significant irreversible environmental changes that would be caused by implementation of a proposed project be evaluated to ensure that such changes are justified. Irreversible changes include the use of nonrenewable resources during the construction and operation of a project to such a degree that the use of the resource thereafter becomes unlikely. A significant environmental change can result from a primary and secondary impact (such as a highway improvement that provides access to a previously inaccessible area) that generally commits future generations to similar uses. Finally, irreversible environmental change can also result from environmental accidents associated with the project. The following irreversible environmental changes are identified for the West Los Angeles Transportation Facility and Sunset Avenue Project.

1. WEST LOS ANGELES TRANSPORTATION FACILITY

The project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the project and would continue throughout its operational lifetime. The new development would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project site. Construction of the project would require the consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Note that some of the demolition debris may be suitable for reuse as building and foundation materials for the proposed project. Fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment.

The relocation of the Division 6 operations and maintenance facility in Venice to the West Los Angeles Transportation Facility site, in and of itself, would have no effect on existing bus routes or scheduling, the number of Metro employees, or the Metro's on-going bus fleet transition from diesel-fueled to compressed natural gas (CNG)-fueled buses. However, the project would result in a redistribution of the physical location where buses from existing routes are currently parked and maintained. Net non-revenue miles would decrease, since the bus maintenance facility would be moved from Venice (which is situated at the westernmost

boundary of the service area) to an area that is more central to the overall service area. At this time, a quantitative, non-revenue miles analysis has not been conducted since it is unknown exactly how bus maintenance and overnight parking assignments would change; however, it is conservatively estimated that deadhead miles would be reduced by an average of 2.5 miles per trip, for each bus that would be parked and maintained at the new Transportation Facility location. Fuel consumption and corresponding pollutant emissions related to the change in non-revenue miles would decrease. Therefore, the project would result in a beneficial net decrease in use of petroleum-based fuels and in long-term regional mass daily emissions. It would also reduce operating costs for the provision of public transportation.

Operation of the project would occur in accordance with Title 24, Part 6 of the California Code of Regulations, which sets forth conservation practices that would limit the amount of energy consumed by the project. Additionally, the project would be subject to energy efficient planning and construction guidelines as set forth by the City of Los Angeles. Further, the Transportation Facility would incorporate energy-saving design features to meet LEED Certification Standards. However, the energy requirements associated with the project would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

The proposed transportation center would result in the development of a vacant site to an industrial use. However, the site has been previously developed and is located in an urbanized area and surrounded by light industrial and commercial uses. Therefore, while the West Los Angeles Transportation Facility would commit the project site to a particular land use, it will not cause irreversible changes to previously undeveloped land.

Development of the West Los Angeles Transportation Facility would involve the removal or treatment of contaminated soils identified on some areas of the project site. These soils would be removed or treated on site in accordance with South Coast Air Quality Management District (SCAQMD), Department of Toxic Substances Control (DTSC), OSHA, and Cal-OSHA requirements. The proposed project would also include the placement of several underground storage tanks for waste oil, new motor oil, new antifreeze/coolant, and waste antifreeze/coolant liquids. Placement of these tanks during the construction phase would be done in compliance with the City of Los Angeles Fire Department (LAFD) and California Regional Water Quality Control Board, Los Angeles Region (LARWQCB) requirements. Operation of the West Los Angeles Transportation Facility would involve the storage and use of hazardous materials in a quantity that would require the preparation of an Accidental Risk Prevention Program. The development and implementation of this program would reduce the risk associated with the storage and handling of hazardous materials to a less than significant level. Compliance with applicable regulations would serve to protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials. See Section IV.E., Hazardous Materials for a complete discussion of this issue.

In sum, construction and operation of the West Los Angeles Transportation Facility would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during the life of the project. However, continued use of such resources would be of a relatively small scale and would be consistent with regional and local growth forecasts in the area. Furthermore, the loss of such resources would not be highly accelerated as compared to historical site uses. As such, although irreversible environmental changes would result from the project, such changes would not be considered significant.

2. SUNSET AVENUE PROJECT

Similar to the West Los Angeles Transportation Facility project, the Sunset Avenue Project would result in the consumption of limited, slowly renewable, and non-renewable resources during the construction and operation phases. Consumption of these resources during the construction phase would be the same as previously described for the West Los Angeles Transportation Facility. The resources that would be committed during operation of the project would be similar to those currently consumed by the existing transportation center operating on the project site and would include electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Overall, the rate of consumption of these resources would increase as the project would result in the relocation and the replacement of the Division 6 operations and maintenance facility in Venice to the West Los Angeles Transportation Facility site. It is noted that the increase in consumption that would be generated by the proposed project, would not be considered significant overall when compared with existing energy consumption levels citywide. Operation of residential and commercial uses associated with the proposed project would occur in accordance with energy conservation practices specified in Title 24, Part 6 of the California Code of Regulations. In addition, the project would be subject to energy efficient planning and construction guidelines as set forth by the City of Los Angeles. However, like the West Los Angeles Transportation Facility, the energy requirements associated with the project would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

The proposed Sunset Avenue Project would replace the existing transportation center with a mix of residential and commercial uses. However, the site is located in an urbanized area and surrounded by predominately residential uses. Therefore, while the Sunset Avenue Project would commit the site to a particular land use, it will not cause irreversible changes to previously undeveloped land.

As described in Section IV.E., Hazardous Materials, development of the Sunset Avenue Project would involve the removal of low-level contaminated soils and the removal of

underground storage tanks. . Any low-level contaminated soils would be removed and treated in accordance with relevant SCAQMD, DTSC, OSHA, and Cal-OSHA requirements. Similarly, compliance with regulations regarding underground storage tanks (USTs) would ensure that any USTs found on-site would be properly removed thereby avoiding any significant environmental change that could occur as a result of environmental accidents associated with USTs. Under the proposed project, there would also be a limited use of other potentially hazardous materials, including cleaning solvents and pesticides for landscaping. These materials would be contained, stored, and used in accordance with manufacturers' instructions and applicable standards and regulations. Compliance with such regulations would serve to protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials.

Similar to the conclusions presented for the West Los Angeles Transportation Facility, construction and operation of the Sunset Avenue Project would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during the life of the project. However, continued use of such resources would be of a relatively small scale and would be consistent with regional and local growth forecasts in the area. Furthermore, the loss of such resources would not be highly accelerated as compared to existing conditions. As such, although irreversible environmental changes would result from the project, such changes would not be considered significant.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS
D. GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that an EIR analyze growth-inducing impacts of a project. Growth-inducing impacts are characteristics of a project that could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the area surrounding a project site. Impacts associated with the removal of obstacles to growth as well as the development of facilities that encourage and facilitate growth are considered to be growth-inducing. However, as stated in the CEQA Guidelines, it is not to be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. Growth-inducing impacts associated with the West Los Angeles Transportation Facility and Sunset Avenue Project are described below.

1. WEST LOS ANGELES TRANSPORTATION FACILITY

The proposed project consists of the relocation and expansion of the existing operations at Venice to the project site. The West Los Angeles Transportation Facility would include expanded maintenance facilities, an administration building, CNG fueling facilities, fare retrieval vault houses, a tire shop, and bus and employee parking on 4.66 acres. The proposed project is discussed in more detail in Section II, Project Description. The relocation of the Division 6 operations and maintenance facility in Venice to the West Los Angeles Transportation Facility site, in and of itself, would have no effect on existing bus routes or scheduling, the number of Metro employees, or the Metro's on-going bus fleet transition from diesel-fueled to compressed natural gas (CNG)-fueled buses. The project would however result in a redistribution of the physical location where buses from existing routes are currently parked and maintained, as well as a redistribution of the physical location where existing employees work to accommodate such changes. The routes to be served from the new Transportation Facility are already being served by Metro. No change in the number of routes, their lengths, and the frequency of service is proposed. Since the Division 6 operations and maintenance facility in Venice does not have sufficient capacity to serve all of the Westside and Central routes, buses operating from other divisions are presently assigned to do so. Thus, the revenue miles associated with buses on-route is not expected to change substantially. Net non-revenue miles would decrease, since the bus maintenance facility would be moved from Venice (which is situated at the westernmost boundary of the service area) to an area that is more central to the overall service area. Since Metro employees reside all over the region, it is conservatively assumed that commute miles would increase for some employees and decrease for others, to result in a negligible change in overall commute trip.

Additionally, since the project site is located in an urbanized area and had been previously developed as an industrial use, operation of the project would not require the extension of infrastructure, such as roads or utilities that would be expected to accommodate substantive growth beyond the project. Implementation of the project would also not open up undeveloped areas to new development or induce growth that was previously restricted due to inadequate access or infrastructure capacity. Overall, no growth-inducing impacts would occur as a result of this project.

2. SUNSET AVENUE PROJECT

The Sunset Avenue Project would replace the relocated transportation center operations at Venice with a mix of residential and commercial uses supported by subterranean parking. The residential component includes 225 multi-family dwelling units, while the commercial component includes 10,000 sq. ft. of café, retail, and health club uses. Development of the project would result in increased population of the site from 144 employees to 457 residents and 27 employees[264]. The number of units proposed and corresponding increase in population are within SCAGs forecasts for the Venice area, as described in the Initial Study prepared for the Sunset Avenue Project and included as Appendix A. In addition, the proposed residential development would meet existing and projected housing demand. The additional employment is expected be provided from the existing labor force in the area. Furthermore, the projected increase in workers would not exceed SCAGs forecasts for the area. Since the project site is located in an urbanized area and is currently used as a bus transportation center, operation of the project would not require the extension of infrastructure, such as roads or utilities that would be expected to accommodate substantive growth beyond the project. Implementation of the project would also not open up undeveloped areas to new development or induce growth that was previously restricted due to inadequate access or infrastructure capacity. Overall, no growth-inducing impacts beyond the direct effects of additional housing and employment opportunities would occur as a result of this project.

[264] *144 existing employees, source: Bruce Buck, Metro Division 6 Assistant Maintenance Manager; 457 residents, source: 2.03 residents per unit at 225 units; and 27 future employees, source: Institute of Transportation Engineers, Trip Generation 6th Edition.*

VI. OTHER ENVIRONMENTAL CONSIDERATIONS
E. POTENTIAL SECONDARY EFFECTS

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires that, "If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the West Los Angeles Transportation Facility and the Sunset Avenue Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the measures by environmental issue for each project site.

1. WEST LOS ANGELES TRANSPORTATION FACILITY

a. Air Quality

All of the air quality mitigation measures would be implemented during the construction phase of the project and, thus, would be temporary in nature.

Mitigation Measures WLA-B.1 and WLA-B.2 address construction equipment inspection and maintenance, construction equipment tuning, and measures to limit exhaust emissions from construction vehicles. Because these measures represent procedural actions and would either result in no physical changes or beneficial changes to the environment, none would result in significant secondary impacts.

Mitigation Measure WLA-B.3 requires the use of electricity from power pole lines rather than temporary generators if or where feasible, and Mitigation Measure WLA-B.4 requires the use of on-site mobile equipment powered by alternative fuel if or where feasible. Neither of these measures would result in physical changes to the environment and, as such, would not result in secondary impacts.

b. Historic Resources

Mitigation Measures WLA-C.1 and WLA-C.2 include suspension of construction activities should unanticipated vertebrate fossil resources or archaeological resources be

encountered, evaluation of said resources by qualified personnel, and appropriate recovery and recordation. These measures would not result in physical changes to the environment, and, as such, their implementation would not cause potential secondary effects on the environment.

c. Geology/Seismic Hazards

Mitigation Measures WLA-D.1 through WLA-D.8, contained in the Geotechnical Engineering Study prepared for the project site, address site preparation activities, including soil removal; soil compaction; building foundation support; removal of other subsurface structures, utility lines, and uncontrolled fill, if necessary; and composition and placement of fill material. Potential secondary effects associated with the export of excavated foundation and soil materials, as referenced in Mitigation Measures WLA-D.1 and WLA-D.5, may include the generation of construction traffic and reduction in available landfill capacity. However, construction traffic trips were analyzed in Sections IV.B., Air Quality; IV.H., Noise; and IV.I., Transportation and Circulation, including trips that might be generated as a result of soil or foundation materials exported offsite. In addition, if the export of such materials offsite is necessary, these materials would be deposited at a site accepting import or one of several unclassified (or inert) landfills in the area, which do not have capacity constraints. Mitigation Measure WLA-D.4 may involve the use of pile drivers. However, this potential noise impact during construction has been analyzed in Section IV.H, Noise. Mitigation Measure WLA-D.5 may involve the removal of utility lines. However, such removal would be limited to onsite utilities and coordinated with the affected utility purveyors. Therefore, implementation of these measures would not result in significant secondary impacts.

Mitigation Measures WLA-D.9 through WLA-D.11 provide additional recommendations from the Geotechnical Engineering Study and include further geotechnical evaluation of compacted fill materials, lateral settlement, and other site preparation and/or construction activities. No secondary impact would result from the implementation of these measures, since they are designed to ensure that no impacts relating to grading or construction activities associated with the proposed project would occur.

d. Hazardous Materials

No significant impacts would result from implementation of the mitigation measures contained in the Section IV.E. Hazardous Materials (Mitigation Measure WLA-E.1). Implementation of this mitigation measure in conjunction with DTSC, OSHA, and Cal-OSHA regulatory requirements, would ensure that no significant impacts would result.

e. Noise

Mitigations Measures WLA-H.1 through WLA-H.2 apply to site activities, and limit the amount of noise that could be generated by the project. These measures would have no secondary effects.

f. Transportation and Circulation

Mitigation Measure WLA-I.1 requires the preparation of a Work Area Traffic Control Plan to minimize construction traffic impacts associated with the proposed project. The implementation of this measure would not result in any additional construction impacts beyond those identified in Section IV.I, Transportation and Circulation, and, as such, would not result in secondary impacts.

Mitigation Measure WLA-I.2 requires a roadway modification at the intersection of Jefferson Boulevard and La Cienega Boulevard. Potential secondary effects would be associated with right-of-way acquisition and construction activities and may include short-term air quality, traffic, and noise impacts. As this improvement is implemented, appropriate construction practices intended to minimize impacts would be required by the City of Los Angeles. Therefore, secondary effects would be less than significant.[265]

2. SUNSET AVENUE PROJECT

a. Aesthetics

Mitigation Measure Sunset-A.1 recommends reduced building heights for those residential structures facing Sunset Avenue and Thornton Place. Since this mitigation measure is limited to the project site and would result in a beneficial visual effect to offsite residents, implementation of this mitigation measure, if feasible, would not result in significant impacts.

[265] *The traffic analysis for the proposed project identified an alternative mitigation measure. This measure would reroute inbound buses to Rodeo Road and make the southbound right-turn at that intersection with another right turn from westbound Rodeo Road to northbound Jefferson Boulevard. This measure could have secondary impacts on traffic and noise. Noise impact may arise due to the close proximity of single family and multi-family residential uses to the effected roadways. Pursuant to Supervisor Yvonne B. Burke's motion of September 25, 2003, Agenda Item No. 26, this measure is not currently proposed, due to the potential secondary noise impacts.*

b. Air Quality

All of the air quality mitigation measures would be implemented during the construction phase of the project and, thus, would be temporary in nature.

Mitigation Measures Sunset-B.1 and Sunset-B.2 address construction equipment inspection and maintenance, traffic speeds, construction equipment tuning, and measures to limit exhaust emissions from construction vehicles. Because these measures represent procedural actions and would either result in no physical changes or beneficial changes to the environment, none would result in significant secondary impacts.

Mitigation Measure Sunset-B.3 requires the use of electricity from power pole lines rather than temporary generators if or where feasible, and Mitigation Measure Sunset-B.4 requires the use of on-site mobile equipment powered by alternative fuel if or where feasible. Neither of these measures would result in physical changes to the environment and, as such, would not result in secondary impacts.

c. Cultural Resources

Mitigation Measure Sunset-C.1 provides for the preparation of a photographic documentation report by a qualified architectural historian, historic architect, or historic preservation professional prior to the alteration, relocation demolition, or new construction associated with the Vietnam POW/MIA mural. This measure would not result in physical changes to the environment, and therefore implementation of this measure would not cause potential secondary effects on the environment. Mitigation Measure Sunset-C.2 would involve the potential relocation of the mural to an offsite location, if determined feasible by a qualified historic architect or structural engineer. If relocation were to occur, very short-term impacts on traffic, air quality, and noise would occur. Such impacts would be less than significant.

Mitigation Measures Sunset-C.3, Sunset-C.4, WLA-C.1, and WLA-C.2 include suspension of construction activities should unanticipated vertebrate fossil resources or archaeological resources be encountered, evaluation of said resources by qualified personnel, and appropriate recovery and recordation. These measures would not result in physical changes to the environment, and as such, their implementation would not cause potential secondary effects on the environment.

d. Geology/Seismic Hazards

Mitigation Measures Sunset-D.1 through Sunset-D.10, contained in the Geotechnical Engineering Study prepared for the project site, address site preparation activities including soil removal; soil compaction; building foundation support; removal of other subsurface structures, utility lines, and uncontrolled fill, if necessary; soil stabilization; and composition and placement of fill material. Potential secondary effects associated with the export of excavated foundation and soil materials, as referenced in Mitigation Measures Sunset-D.1 and Sunset-D.4, may include the generation of construction traffic and reduction in available landfill capacity. However, construction traffic trips were analyzed in Sections IV.B., Air Quality; IV.H., Noise; and IV.I., Transportation and Circulation. In addition, these materials would be deposited at one of several unclassified (or inert) landfills in the area, which do not have capacity constraints. Mitigation Measure Sunset-D.4 may involve the removal of utility lines. However, such removal would be limited to onsite utilities and coordinated with the affected utility purveyors. Therefore, implementation of these measures would not result in significant secondary impacts.

Mitigation Measures Sunset-D.11 through Sunset-D.13 provide additional recommendations from the Geotechnical Engineering Study and include further geotechnical evaluation of compacted fill materials, lateral settlement, and other site preparation and/or construction activities. No secondary impact would result from the implementation of these measures, since they are designed to ensure that no impacts relating to grading or construction activities associated with the proposed project would occur.

e. Hazardous Materials

Mitigation Measure Sunset-E.1 requires a plan for hauling of soils and debris. Such a plan would reduce potential impacts. Impacts of haul trips are analyzed in Sections IV.B., Air Quality; IV.H., Noise; and IV.I., Transportation and Circulation.

f. Land Use

No significant impacts would result from implementation of the mitigation measures contained in Section IV.G., Land Use (Mitigation Measures Sunset-G.1 and Sunset-G.2, as these measures ensure implementation of the project as analyzed in the EIR and ensure compliance with the City of Los Angeles Land Use Plan (i.e., the Venice Local Coastal Program Land Use Plan and the Venice Coastal Zone Specific Plan). These measures would not result in direct physical changes to the environment. As such, the environmental effects associated with the implementation of these measures have been considered in the impacts discussion in Section IV.G of this EIR; no additional impacts, including potential secondary effects, are anticipated.

g. Noise

Mitigation Measures Sunset-H.1 through Sunset-H.7 would be implemented as part of the proposed project. As such, the environmental effects associated with the implementation of these measures have been considered in the impacts discussion in Section IV.H, Noise, of this EIR; no additional impacts, including potential secondary effects, are anticipated. Mitigation Measures Sunset-H.1 through Sunset-H.6 would be implemented during construction of the project and would be temporary in nature. Mitigation Measures Sunset-H.1 through Sunset-H.4 and Sunset-H.6 limit hours of construction, limit noise and vibration from pile drivers, and address construction staging loading and staging. Implementation of these measures would not result in physical changes to the environment and, as such, would not result in secondary impacts. Mitigation Measure Sunset-H.4 requires that heavy-duty trucks use a City-approved haul route. Since this measure is designed to minimize impacts on noise-sensitive land uses and would be subject to City review and approval, no secondary impacts are anticipated. Mitigation Measure Sunset-H.4 requires that a temporary eight-foot sound barrier be erected around the site perimeter. As feasible, this wall would be placed to maximize the use of existing landscaping as visual buffers. Furthermore, as this wall would be erected for a short period of time, as necessary to break the line-of-sight between the noise sources and adjacent residences, no significant secondary impacts would result.

h. Transportation and Circulation

Mitigation Measure Sunset-I.1 requires the preparation of a Work Area Traffic Control Plan to minimize construction traffic impacts associated with the proposed project. The implementation of this measure would not result in any additional construction impacts beyond those identified in Section IV.I, Transportation and Circulation, and, as such, would not result in secondary impacts.

Mitigation Measure Sunset-I.2 constrains project access to limit traffic impacts. No additional impacts, including secondary impacts are anticipated. Implementation of Mitigation Measures Sunset-I.3 and Sunset-I.4 would result in the removal of seven on-street parking spaces. However, additional public parking would be provided as part of the proposed project. Therefore this secondary impact would be less than significant. Mitigation Measure Sunset-I.5 would upgrade two existing pedestrian crossings. The upgrade of these crossings would be implemented during construction and would be temporary in nature. Mitigation Measure Sunset I.6 would contribute to public transportation services. Mitigation Measure Sunset-I.7 would contribute to improved traffic operations, and Mitigation Measure Sunset-I.8 would limit impacts related to site access. Therefore, no significant secondary impacts would result.

i. Parking

Mitigation Measures Sunset-J.1 and Sunset-J.2 would limit areas where construction workers would be allowed to park (i.e., on public parking lots rather than residential streets). Since on-site employee parking would be available during most of the construction phase, off-site employee parking would be for a limited duration, and public parking lots are located nearby, no significant secondary impacts would result.

3. CONCLUSION

In conclusion, each of the mitigation measures contained in the EIR has been evaluated to determine if significant secondary effects would result from the implementation of those measures. As indicated above, the implementation of the proposed mitigation measures for the West Los Angeles Transportation Facility and Sunset Avenue Project would not result in significant secondary environmental effects. The traffic analysis in Section IV.I, above, identified an alternative traffic mitigation measure for impacts at the intersection of La Cienega Boulevard and Jefferson Boulevard that could potentially cause a significant impact on noise, because of the close proximity of single family and multi-family residential uses to the effected roadways. Pursuant to a motion presented by Supervisor Yvonne. B. Burke as Agenda Item No. 26 on September 25, 2003, this measure is not proposed due to the potential for such noise impact. (The Motion is included in this Draft EIR as Appendix H-1.)

VI. OTHER ENVIRONMENTAL CONSIDERATIONS
F. EFFECTS NOT FOUND TO BE SIGNIFICANT

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a statement briefly indicating the reasons that certain effects of the project were determined not to be significant and were therefore not discussed in detail in the EIR. Separate Initial Studies were prepared for the West Los Angeles Transportation Facility and the Sunset Avenue Project, which together comprise the proposed project. These Initial Studies are included as Appendix A1 and Appendix A2, respectively, of this EIR and provide a detailed discussion of the potential environmental impact areas and the reasons that each topical area was or was not going to be analyzed further in the EIR. In general, for both site locations effects were determined not to be significant for specified resources (agriculture, biological, or mineral resources) or certain conditions of the project site (landslides, floodplains, groundwater recharge, or drainage). Effects were also determined not to be significant for induced population and housing. Furthermore, the proposed project would also not be expected to interfere or affect certain public services (fire, police, schools, parks) or utilities and service systems (stormwater, solid waste).

VII. Persons and Organizations Consulted

VII. PERSONS AND ORGANIZATIONS CONSULTED

LEAD AGENCY – WEST LOS ANGELES TRANSPORTATION FACILITY

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CO-LEAD AGENCIES – SUNSET AVENUE PROJECT

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Department of City Planning

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PROJECT APPLICANT

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Los Angeles Regional Water Quality Control Board
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- Rebecca Chou, Section Chief – Site Cleanup I,

VIII. References and Acronyms

VIII. REFERENCES AND ACRONYMS

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B. LIST OF ACRONYMS

Acronym	Definition
AAQS	Ambient Air Quality Standards
AF	Acre Feet
BGS	Below Ground Surface
BIZ	Beach Impact Zone
BMPs	Best Management Practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAC	California Administrative Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CFR	Code of Federal Regulations
CIP	Wastewater Capital Improvement Plan
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CO	Carbon Monoxide
CWC	California Water Code
dB	Decibel
dBA	A-Weighted Decibel
DDT	Dichlor-Dyphenyl-Trichloroethane
DWP	Los Angeles Department of Water and Power
DWR	State of California Department of Water Resources
gpd	Gallons per Day
gpm	Gallons per Minute
HREC	Historically Recognized Environmental Conditions
HTP	Hyperion Treatment Plant
IRP	Integrated Resources Plan
ITE	Institute of Transportation Engineers
LADOT	Los Angeles Department of Transportation
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAP	Los Angeles Pacific Electric
LARWQCB	Los Angeles Regional Water Quality Control Board
Ldn	Day-Night Average Level
LOS	Level of Service
LUST	Leaking Underground Storage Tanks
MEP	Maximum Extent Practicable
mg/Kg	Milligrams Per Kilogram
mgd	Million Gallons per Day

Acronym	Definition
MS4	Municipal Separate Storm Sewer System
MTA	Metropolitan Transit Authority
MTBE	Methyl Tert Butyl Ether
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standards
NO_2	Nitrogen Dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
OSHA	Federal Occupational Safety and Health Administration
PAH	Polynuclear Aromatic Hydrocarbons
Pb	Lead
PCBs	Polychlorinated Biphenyls
PM_{10}	Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
PRC	Public Resources Code
psi	Pounds per Square Inch
RECs	Recognized Environmental Conditions
ROWD	Report of Waste Discharge
RWQCBs	Regional Water Quality Control Boards
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	State Implementation Plan
SO_2	Sulphur Dioxide
SQMP	Storm Water Quality Management Program
SUSMP	Standard Urban Strom Water Mitigation Plan
SWPPP	Storm Water Pollution Prevention Program
SWRCB	State Water Resource Control Board
TAME	Tert Amyl Methyl Either
TMDLs	Total Maximum Daily Loads
TRPH	Total Recoverable Petroleum Hydrocarbon
TSS	Total Suspended Solids
TVPH	Total Volatile Petroleum Hydrocarbons
UBC	Uniform Building Code
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tanks
VOC	Volatile Organic Compounds
WLA	Waste Load Allocation
WMA	Watershed Management Area
WMI	Watershed Management Initiative
µg/L	Micrograms Per Liter

Appendix A – Notice of Preparation, NOP Comments, Initial Study:

West Los Angeles Transportation Facility

A1 – West Los Angeles Transportation Facility

Sunset Avenue Project

A2 – Sunset Avenue Project

West Los Angeles Transportation Facility

A1 – West Los Angeles Transportation Facility

Notice of Preparation and
Notice of Public Scoping Meeting

TO: Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Preparation of an Environmental Impact Report (California Code of Regulations, Title 14, Section 15082).

The Los Angeles County Metropolitan Transportation Authority (MTA) is the Lead Agency under the California Environmental Quality Act (CEQA) for the West Los Angeles Transportation Center project. The MTA is preparing an Environmental Impact Report (EIR) for this project.

Agencies: The MTA requests your agency's views on the scope and content of environmental information, if any, relating to the proposed West Los Angeles Transportation Center that may be relevant to your agency's statutory responsibilities. The MTA makes this request in accordance with California Code of Regulations Title 14, Sections 15082, 15103, and 15375. Your agency may need to use the EIR when considering any permit or other approval that your agency must issue for the proposed project.

Organizations and Interested Parties: The MTA requests your comments and concerns regarding the proposed West Los Angeles Transportation Center.

Responses and Comments: The MTA will accept written responses and comments on this Notice of Preparation transmitted via mail, fax or email from the date of this notice through and including January 5, 2004. Please indicate a contact person for your agency or organization and send your responses and comments to:

Mr. Tim Lindholm, Project Manager – Facilities/Operations
Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop: 99-18-2
Los Angeles, CA 90012-2952

Tel: (213) 922-7297
Fax: (213) 922-7136
Email: wlactc@mta.net

PROJECT TITLE: West Los Angeles Transportation Center

PROJECT LOCATION: The project site is located on the east side of Jefferson Boulevard between Rodeo Boulevard and National Boulevard in the City of Los Angeles, just east of the City of Culver City.

PROJECT DESCRIPTION: The West Los Angeles Transportation Center is proposed as an operations and maintenance facility to support a fleet of as many as 175 clean compressed natural gas (CNG) coaches. Please refer to more descriptive information presented in Attachment A: Project Description.

PROBABLE ENVIRONMENTAL EFFECTS: An Initial Study will be completed following receipt of written public input during the Notice of Preparation circulation period and oral input provided during the Public Scoping Meeting to be held on December 16, 2003. Pending such input, it is preliminarily expected that the EIR will address environmental topics including traffic and circulation, air quality, environmental noise, land use and aesthetics. Should additional issues arise in response to the NOP or scoping meeting, the scope of the Draft EIR would be expanded, as necessary, to accommodate all areas of potential environmental effect. The Draft EIR will also analyze a range of reasonable alternatives, per CEQA Guidelines Section 15126.6.

PUBLIC SCOPING MEETING DATE AND LOCATION: Tuesday, December 16, 2003 from 6:30 P.M. to 9:00 P.M. at the Baha'i Center located at 5755 Rodeo Drive, Los Angeles, California 90016 in the MPR Room.

NOTIFICATION OF ACCESSIBLE FORMATS: Upon request, sign language interpretation, materials in alternative formats and other accommodations are available to the public for MTA-sponsored meetings and events. All requests for reasonable accommodation must be made at least three working days (72 hours) in advance of the scheduled meeting date. For additional information, please contact Ms. Jody Feerst Litvack at the following telephone and fax numbers or email address: **Telephone** (213) 922-1420; **Fax** (213) 922-1212; **Email** wlactc@mta.net

ATTACHMENT A: PROJECT DESCRIPTION

The Los Angeles County Metropolitan Transportation Authority (MTA), in collaboration with RAD Jefferson LLC (Project Developer), proposes to develop a new West Los Angeles Transportation Center for a fleet of clean-fuel compressed natural gas (CNG) coaches. The transportation center, once developed, will be owned and operated by the MTA. The 4.66-acre property is located on the east side of Jefferson Boulevard between Rodeo Boulevard and National Boulevard in the City of Los Angeles, as identified in the local and regional location map presented as Figure 1. This property is presently vacant and was previously used for light industrial purposes from which a few deteriorated structures remain.

The purpose of this facility is to provide improved public transit service in the central and western areas of Los Angeles County including large portions of the City of Los Angeles (including the communities of West Adams, Mid-City and South L.A., etc.) and the incorporated cities of Beverly Hills, Culver City, Malibu, Santa Monica and West Hollywood. The new transportation center will replace an existing antiquated maintenance facility inefficiently located in the Venice community on the extreme western edge of the service area. This new facility will allow the MTA to expand service from a centralized location in response to growing ridership and to do so with a new CNG fleet replacing older diesel coaches.

The facility to be developed includes coach parking, employee parking, maintenance facilities, coach maintenance and cleaning equipment, CNG fueling facilities, fare retrieval vault houses, a tire shop, and a administration building. The facility will be designed and constructed to maintain, service, and operate a maximum of 175 CNG coaches. The administration building is proposed with as much as 9,000 square feet of floor area in a three-story structure to house coach operator dispatch, training rooms, break areas, and administrative functions. The maintenance building will contain a maximum of 20 covered maintenance bays for coach repairs and inspection, a parts distribution and storage room, and offices for maintenance administration in approximately 35,000 square feet of improved space. A parking deck for up to 200 employee vehicles will be provided on top of the maintenance building. First and second level site plans of the new transportation center are presented in Figure 2 and Figure 3. All ingress and egress for the facility will be from Jefferson Boulevard.

Although the facility will operate 24 hours a day, seven days a week, most activity can be expected between 6:00 A.M. and 10:00 P.M., Monday through Friday, when ridership demand is greater and the service fleet returns for fueling and cleaning. Due to the need for the majority of MTA coaches to be in service throughout Los Angeles during peak travel periods, most buses will leave the facility well before morning rush hour and return after evening rush hour. Most employees will arrive to and leave the facility around these times. Employees will work in shifts out of this facility with approximately 300 total employees assigned to the site. These include bus operators, mechanics, service attendants, supervisors, and management personnel.

CITY OF LOS ANGELES
CALIFORNIA

JAMES K. HAHN
MAYOR

DEPARTMENT OF FIRE

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December 17, 2003

Mr. Tim Lindholm, Project Manager-Facilities/Operations
Metropolitan Transportation Authority
One Gateway Plaza
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Los Angeles, CA 90012-2952

WEST LOS ANGELES TRANSPORTATION CENTER

PROJECT LOCATION

East side of Jefferson Boulevard between Rodeo Boulevard and National Boulevard

PROJECT DESCRIPTION

Operations and maintenance facility on 4.66 acres comprised of parking, and fueling facilities, a 9,000 square foot 3-story administration building, a 35,000 square foot maintenance building with roof top parking.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 9,000 G.P.M. from 6 fire hydrants flowing simultaneously.

B. Response Distance, Apparatus, and Personnel

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 94
4470 Coliseum Street
Los Angeles, CA 90016
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Staff – 12
Miles – 2.05

Fire Station No. 43
10234 National Boulevard
Los Angeles, CA 90034
Single Engine Company
Paramedic Rescue Ambulance
Staff – 6
Miles – 2.16

Fire Station No. 68
5023 W. Washington Boulevard
Los Angeles, CA 90019
Single Engine Company
Paramedic Rescue Ambulance
Battalion 18 Headquarters
Staff – 7
Miles – 2.27

The above distances were computed to Jefferson, mid-block between National Boulevard and Rodeo Boulevard.

C. Firefighting Access

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

The Fire Department will require additional vehicular access where buildings exceed 28 feet in height.

Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.

No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

On-site hydrants may be required after review of plot plans.

In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems will be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07.

Submit plot plans for Fire Department approval of access and fire hydrants.

CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact Inspector Griffin of the Construction Services Unit at (213) 482-6506.

WILLIAM R. BAMATTRE
Fire Chief

Alfred B. Hernandez, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

ABH:RG:gm
c:w.l.a. transportation cntr

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
120 SO. SPRING ST.
LOS ANGELES, CA 90012
PHONE: (213) 897-4429
FAX: (213) 897-1337

Flex your power!
Be energy efficient!

IGR/CEQA No. 031230AL, NOP
West Los Angeles Transportation Plan
Vic. LA-10 / PM R6.31, LA-405 / PM 25.93
SCH #: 2003121036

December 16, 2003

Mr. Tim Linholm
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
MS 99-18-2
Los Angeles, CA 90012-2952

Dear Mr. Linholm:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

To assist us in our efforts to evaluate the impacts of this project on State transportation facilities, a traffic study in advance of the DEIR should be prepared. We wish to refer the project's traffic consultant to our traffic study guideline Website:

http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf

and we list here some elements of what we generally are expecting in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to State Route 10 and 405.

2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.

3. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.

4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include: existing + project + other projects + other growth.

5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:

    - Description of Transportation Infrastructure Improvements
    - Financial Costs, Funding Sources and Financing
    - Sequence and Scheduling Considerations
    - Implementation Responsibilities, Controls, and Monitoring

    Any mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.

6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). That ratio would be the project equitable share responsibility.

    We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-link travel forecast modeling might be used.

    The Department as commenting agency under CEQA has jurisdiction superceding that of MTA in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150 or more vehicle trips added before freeway analysis is needed. MTA's Congestion Management Program in acknowledging the Department's role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System. Therefore State Route(s) mentioned in item #1 and it's facilities must be analyzed per the Department's Traffic Impact Study Guidelines.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact me at (213) 897-4429 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 0312230AL.

Sincerely,

Edwin C. Kampmann
for Stephen J. Buswell

STEPHEN J. BUSWELL
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

9770 CULVER BOULEVARD CULVER CITY, CA 90232-0507 www.culvercity.org

January 2, 2004

Todd Lindholm, Project Manager – Facilities/Operations
Metropolitan Transportation Agency
One Gateway Plaza
Mail Stop 99-18-2
Los Angeles, CA 90012-2952

Culver CITY

Subject: Comments on the Notice of Preparation of an EIR/EIS for the West Los Angeles Transportation Center

Dear Mr. Lindholm:

Please consider the following requests and respond to the following questions during the design and EIR/EIS processes for the proposed West Los Angeles Transportation Center (WLATC):

1) Outreach

a. Contact and involve Culver City residents and businesses in the following areas: East Culver City, Hetzler Road, and Tompkins Way; Jefferson Boulevard between the proposed project site and Overland Avenue, and Blair Hills.
b. Culver City staff will provide contact information, if necessary.

2) Bus Routes

a. At the September 25, 2003 MTA Board Meeting, the Board passed a motion prohibiting non-revenue generating (out of service) buses from traveling on sections of Jefferson Boulevard and Rodeo Road. In the EIR/EIS please indicate the specific routing restrictions and provide a proposed route map for non-revenue generating buses. The route map should plainly state where and how Division 6 buses will be routed when not in service.
b. South Jefferson and National Boulevards should not become bus corridors.
c. Non-revenue generating bus traffic should not enter the Hayden Tract.

3) Site Access

a. Indicate how left turns in and out of the proposed facility will be accommodated.
b. Indicate what will become of the small street at the north end of the project property.

MARK T. WARDLAW PLANNING MANAGER
COMMUNITY DEVELOPMENT DEPARTMENT • PLANNING DIVISION
TEL 310.253.5710 FAX 310.253.5721 planning@culvercity.org

c. Indicate how one driveway will adequately support buses, employee vehicles, and day-to-day traffic patterns.
d. The City is concerned that 175 transit buses entering and existing of the WLATC onto Jefferson Boulevard will negatively impact traffic flow and safety in the surrounding area.
e. Indicate traffic impact mitigation measures.
f. Include a complete evaluation of an additional traffic signal at the facility's entrance.

4) Parking

a. Site parking should be sufficient to accommodate all employee and visitor parking needs.
b. Site parking should also include adequate loading/unloading zones for delivery vehicles.
c. Although the Project Description states that an on-site parking deck will provide parking for 200 employee vehicles, the plan in Figure 3 shows employee parking for only 160 vehicles.
d. Indicate how many vehicles will be on-site at any one time.
e. Should the MTA decide to include a customer service facility on-site, how much visitor parking will be provided?

5) Noise, Glare and View Impacts

a. Because the WLATC will be a twenty-four hour facility, the City of Culver City is concerned that late night and early morning operations will result in noise and light pollution in the adjacent neighborhoods.
b. Indicate how the MTA will mitigate noise and light pollution, specifically during late night and early morning hours.
c. Indicate how the MTA will protect nearby residents from noise impacts from the proposed project.
d. Indicate how the MTA will protect residents along the non-revenue generating bus routes from noise impacts as buses travel to and from their fare generating routes.
e. Indicate how the MTA will mitigate negative visual impacts to adjacent and hillside residents.

6) Emissions

a. Indicate how the MTA will mitigate emissions from buses and employee vehicles.
b. Indicate whether any diesel buses will use the WLATC, and if so, when they will be phased out of service.

7) Bus Service and Service Area

a. Indicate whether the facility will be transit accessible.
b. Indicate the facility's service area.

8) Road Capacity

a. Indicate any anticipated traffic impacts from both buses and employee trips.
b. Indicate how traffic impacts will be mitigated.

c. Indicate whether the MTA will make any improvements to the intersection at National and Jefferson Boulevards as a result of this project.
d. Indicate whether the MTA will improve the bridge at National and Jefferson Boulevards as a result of this project.

9) Joint Accommodation of Culver CityBus at the WLATC

a. The City of Culver City (City) is interested in pursuing a partnership with the Metropolitan Transportation Agency (MTA) to accommodate Culver CityBus vehicles at the WLATC, should the need arise.
b. Please indicate whether shared use of the WLATC is open to discussion.

10) CNG Fuel Line Capacity Impacts

a. Complete a thorough evaluation of the project's potential impact on the City's CNG fueling capabilities at the City's transportation facility. Culver City's fueling capabilities cannot be impacted by the project.
b. Provide an explanation of the potential CNG sources for the WLATC.

11) Water Service Capacity Impacts

a. Indicate if the proposed project will negatively impact existing water service in Culver City.
b. Indicate if the MTA will construct any water service capacity improvements.

12) Accommodation of a Customer Service Center at the WLATC

a. The City is hopeful that the WLATC benefit the local community; however, the NOP does not indicate whether a transit accessible customer service center will be provided either at the project location or in the vicinity.
b. Consider including a customer service center either at the facility or in the vicinity and analyze the impacts of a customer service center.

13) Interaction of the WLATC with the Proposed Exposition Light Rail Transit Line

a. Because the proposed project will be located in close proximity to the Exposition LRT line, the interaction of buses with Light Rail must be carefully considered.
b. Evaluate the intersections of La Cienega and Jefferson and National and Jefferson with the Exposition LRT line (and proposed grade crossing).

14) Aesthetics

a. Indicate whether and where the MTA will provide streetscape and/or landscape improvements at the project and in the project vicinity.
b. Indicate whether the MTA will use landscaping to mitigate negative visual impacts to adjacent and hillside residents.
c. Provide an attractive building design.
d. Orient the building toward the street.

15) Monitoring of Facility and Trip Generation Rates
Detail the mitigation monitoring program for the proposed project.

16) Benefits to Surrounding Neighborhoods
Indicate how the WLATC will benefit surrounding neighborhoods, both residential and commercial.

17) Construction Impacts
a. Indicate the anticipated construction schedule.
b. Indicate construction hours.
c. Indicate how the MTA will prevent construction run-off from entering Ballona Creek.
d. Indicate how the MTA will mitigate traffic impacts during construction.
e. Indicate how the MTA will mitigate noise impacts during construction.
f. Indicate how the MTA will mitigate glare impacts during construction.
g. Indicate construction haul routes.

If you have any questions regarding this letter, please contact me via email at alexandra.howard@culvercity.org or via telephone at (310) 253-5751.

Thank you,

Alexandra Howard
Planning Technician

cc: Steve Cunningham, Transportation Director
Jeff Eastman, Acting Fire Chief
Susan Evans, Community Development Director
Jerry Fulwood, Chief Administrative Officer
Pam Keyes, Public Works Director
Gary Martin, Acting Police Chief
Mark Wardlaw, Deputy Community Development Director

Palacios, Elizabeth

From: Lindholm, Timothy
Sent: Thursday, January 15, 2004 4:01 PM
To: Palacios, Elizabeth
Subject: FW: NOP Comments for WLA Transportation Center

-----Original Message-----
From: Susan Bok [mailto:sbok@dot.lacity.org]
Sent: Monday, January 12, 2004 3:33 PM
To: wlactc@mta.net
Cc: Haripal Vir; Jay Kim; James Okazaki; Sean Skehan
Subject: Re: NOP Comments for WLA Transportation Center

LADOT/Advanced Transportation Systems Management Division has reviewed the Notice of Preparation for an EIR for a new West Los Angeles Transportation Center to be located on Jefferson Boulevard between Rodeo Boulevard and National Boulevard in the City of Los Angeles and has the following comments on the scope and contents of the EIR:

Traffic & Circulation

The alignment of the proposed Exposition Light Rail Transit tracks at the intersection of National Boulevard and Exposition Boulevard, just north of the project site, has not been finalized yet. The MTA is currently proposing to place the LRT tracks at grade through this intersection but is considering an aerial grade separation at the City's' request. Since bus access to and from the new Transportation Center will run through this intersection, the EIR should analyze the project's traffic impacts (both bus and non-bus) on the intersection under two alternative scenarios: at-grade tracks and grade-separated tracks. It should include a detailed analysis of impacts on intersection operations with the addition of project-generated traffic and at-grade tracks.

The Exposition LRT will be aerially grade separated at the intersection of La Cienega Boulevard and Jefferson Boulevard. Bus access to and from the new Transportation Center is proposed to run through this intersection. Curb returns are narrow at this intersection and may impair bus turning movements, particularly at the northwest corner. Any proposed widening of curb returns or roadway at this intersection to accommodate bus turning movements should be anaylzed with respect to right-of-way acquisition and conflicts with future support pylons and other infrastructure for the LRT tracks and station.

Thank you for your consideration of these comments. Please keep me informed as you progress through the environmental review of this project.

Susan Bok, ATCP
Supervising Transportation Planner I
City of Los Angeles Department of Transportation
(213) 580-5425
(213) 580-5180 fax
sbok@dot.lacity.org

Sent: Wednesday, December 24, 2003 8:50 AM
To: O'Connell, Andy; Romo, Samuel; Howard, Alexandra
Subject: Subject: MTA West Los Angeles Transportation Center

From: Stefan Freeman

Subject: MTA West Los Angeles Transportation Center

Maintenance Facility

- How large is the facility?
- How many parking spaces?
- How many employees will be working in the facility?
- What are the facility operating hours
- Emissions
  - What is the fuel type?
  - What is the volume of Nox which will be generated?
  - How much noise will be generated by the facility?
- Safety
  - Will the facility be fenced?
  - What security will the facility have?
  - In the case of an explosion (propane) what would be the effect?
- Green Space
  - How much landscaping will be done?
- Effects on Traffic Congestion: and how is the transit Authority proposing to mitigate the additional congestion? Signalization, additional road construction? What?
  - How many buses will be using the facility?
  - How many buses will be stored at the facility?
  - What is the routing the busses will take into the facility?
  - How will the traffic congestion increase (have them put in real time: How may buses will be going in and out of the facility each hour)
- What will be the effect on Residential and Commercial Property Values?
- How will it affect the quality of life of those that reside in the area?

We were not notified by mail of this public meeting nor were our neighbors. This makes it difficult to voice concerns when we were left out of the loop. I'd appreciate any upcoming information on this matter.

Best Regards,

Stefan Freeman.
310-678-4367
Privily@aol.com

West Los Angeles Transportation Center Project
Scoping Meeting
Tuesday, December 16, 2003

Written Comment Form

The purpose of the public scoping meeting is to identify the range of actions, alternatives, and significant effects to be analyzed in the Draft EIR for the West Los Angeles Transportation Center Project. The West Los Angeles Transportation Center is proposed as an operations and maintenance facility to support a fleet of as many as 175 clean, compressed natural gas (CNG) coaches.

Comments can be provided verbally at the scoping meeting or in written form. The MTA should receive written comments by January 5, 2004. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed project. Your comments will then be considered during preparation of the Draft EIR.

Are you speaking tonight? ___ *Yes* X *No*

I STRONGLY REQUEST THAT THIS PROJECT BE CANCELED.
REASONS:
(1) ENVIRONMENTAL HAZZARD to SCHOOLS, PARK, AND RESIDENTS. ITS NOT practical to demonstrate the air quality from this installation.
(2) TRAFFIC IS ALREADY CONGESTED AND JUST A FEW BUSES CAN BE DISASTEROUS
(3) The center will provide NO ECONOMIC BENEFITS, to our community, nor will it enhance the value of our properties

PLEASE ADVISE ME OF DISPOSITION OF ABOVE,

Name: Samuel G. HART Vice-President, BALDWIN HILLS VILLAGE GARDENS, BOARD OF DIRECTORS
Address: 5719 Coliseum St
LA CA 90016
PH 323-249-8006
e-mail SGHARTE@COMCAST.NET

Please leave this form in the box provided or deliver, mail or fax it to Mr. Tim Lindholm, Project Manager – Facilities/Operations, Metropolitan Transportation Authority, One Gateway Plaza, Mail Stop: 99-18-2, Los Angeles, CA 90012-2952. Fax (213) 922-7136. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at wlactc@mta.net. When sending comments, please provide your address so that you may receive public notices regarding this project.

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Are you speaking tonight? __ *Yes* X *No*

I really would like to see alternative sites considered for the West los Angeles Transportation Center Project before making a final decision on the proposed site on Jefferson Blvd. This would insure that the health, safety, and general welfare of the community was taken into account and also the impact this project would have on the community.

If this project is built, it would have a significant impact on the community for years to come.

Thank you for your consideration of my comments concerning this proposed project.

Name: BRADLEY HARRIS
Address: 3410 S. COCHRAN AVENUE
LOS ANGELES, CA 90016

Please leave this form in the box provided or deliver, mail or fax it to Mr. Tim Lindholm, Project Manager – Facilities/Operations, Metropolitan Transportation Authority, One Gateway Plaza, Mail Stop: 99-18-2, Los Angeles, CA 90012-2952. Fax (213) 922-7136. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at wlactc@mta.net. When sending comments, please provide your address so that you may receive public notices regarding this project.

West Los Angeles Transportation Center Project
Scoping Meeting
Tuesday, December 16, 2003

Written Comment Form

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Comments can be provided verbally at the scoping meeting or in written form. The MTA should receive written comments by January 5, 2004. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed project. Your comments will then be considered during preparation of the Draft EIR.

Are you speaking tonight? ___ *Yes* ✓ *No*

CONCERNS:

1. INCREASE IN THE ALREADY HEAVY TRAFFIC IN OUR AREA ON LA CIENEGA, RODEO, AND JEFFERSON BLVDS. (LA CIENEGA IS AN I-405 ALTERNATIVE)
2. INCREASE IN THE UNHEALTHY FUMES AND EXHAUST GASES THAT ALREADY PERMEATE OUR AIR QUALITY.
3. THE SAFETY FACTOR OF BUSES PULLING OUT AND TURNING INTO THIS FACILITY ON A STREET WHERE THE CARS MOVE FAIRLY FAST
4. WILL THIS FACILITY BE AN "EYE SORE" IN OUR COMMUNITY OR SOMETHING PLEASANT TO VIEW?
5. HOW MUCH INCREASE IN THE NOISE OF THE BUSES IS ANTICIPATED AS WE ARE ALREADY BOMBARDED WITH TRAFFIC NOISE.
6. HOW WILL THIS FACILITY BENEFIT AND ENHANCE OUR COMMUNITY?

Name: CECIL A. WALKER
Address: 3482 CARNIONA AVENUE
LOS ANGELES, CA 90016-4659

Please leave this form in the box provided or deliver, mail or fax it to Mr. Tim Lindholm, Project Manager – Facilities/Operations, Metropolitan Transportation Authority, One Gateway Plaza, Mail Stop: 99-18-2, Los Angeles, CA 90012-2952. Fax (213) 922-7136. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at wlactc@mta.net. When sending comments, please provide your address so that you may receive public notices regarding this project.

ATTENTION: Jody

FROM: Michele Freeman

Jody,

This is the formal request from the Hetzler Road residents for a comparable noise study for our road comparable to the one done in Blair Hills. Please keep up notified of all of your progress in this project.

Thanks,

Michele Freeman

Michele Freeman

Palacios, Elizabeth

From: LIndholm, Timothy
Sent: Wednesday, December 24, 2003 10:24 AM
To: Palacios, Elizabeth
Subject: FW: Subject: MTA West Los Angeles Transportation Center

Liz - To be filed in the Div. 6 EIR/CEQA file as a public comment. Thanks. T
-----Original Message-----
From: Litvak, Jody Feerst
Sent: Wednesday, December 24, 2003 10:21 AM
To: 'gctec@aol.com'; 'g.broughton@pcrnet.com'
Cc: 'Howard, Alexandra'; 'jhance@earthlink.net'; 'cdbjorlin@aol.com'; LIndholm, Timothy
Subject: RE: Subject: MTA West Los Angeles Transportation Center

Adrienne:

See the exchange below. I've asked Alexandra at Culver City if she has an address for Mr. Freeman but why don't you contact him directly, add him to the database, and anyone else he suggests, and get him a copy of the NOP. Let him know that we have received his comments from Culver City and they are included as part of the public comment.

Thanks and Happy Holidays.

Jody

> -----Original Message-----
> **From:** Howard, Alexandra [mailto:alexandra.howard@culvercity.org]
> **Sent:** Wednesday, December 24, 2003 9:30 AM
> **To:** litvakj@mta.net
> **Subject:** FW: Subject: MTA West Los Angeles Transportation Center
>
> Jody,
>
> Would you please include the residents from Hetzler Road and Tompkins Way in Culver City in your outreach efforts for this project? Their homes are quite close to the proposed facility and they should be notified.
>
> I have forwarded an email that I received from a Hetzler Road resident. Please include it as part of the public comment on the NOP.
>
> Comments from Culver City staff will be provided prior to the close of the public comment period.
>
> Thank you,
> Alex Howard
> Planning Division
> (310) 253-5751
>
> -----Original Message-----
> **From:** Privily@aol.com [mailto:Privily@aol.com]

BASE architecture

PROJECT:	West Los Angeles Transportation Center
DATE OF MEETING:	Tuesday, June 17, 2003
LOCATION OF MEETING:	Ms. Mary Ann Greene Residence 5969 Wrightcrest Drive Culver City, CA

ATTENDEES: Blair Hills Residents Board is listed below:

Barbara Quave	(310) 839-0527
Joddy Boyer	(310) 839-4911
Joel Wiley	(310) 839-4755
Lee Philipson	(310) 838-3403
Bobbi Gold	
Elston/Bertha Burnley	(310) 836-4630
Genni Hogg	(310) 839-2738
Rose Martz	
Mary Ann Greene	

MTA Staff and Consultants:

Jodi Feerst Litvak	MTA
Denise L. Longley	MTA
Wilbur Babb	MTA
Michael H. Anderson	BASE Architecture

PURPOSE OF MEETING: Presentation on Planned Transportation Facility

1.0 JL: Thanked Mary Greene for allowing the meeting to take place in her residence and asked the attendees to introduce themselves.

1.1 JL: Described MTA's mission and operations of serving Los Angeles and purpose of the planned West Los Angeles Transportation Facility. The facility is a bus employee and yard facility. The maximum bus capacity will be approximately 150 buses. Similar MTA facilities are El Monte at approximately 300 buses and West Hollywood with approximately 250 buses. The facility will accommodate up to 300 employees during the 24 hour, seven day a week operation. All employees will not be at the facility at one time, most will be in the field or operating buses away from the facility. Most buses will leave the site before 6:00 am before rush hour. Buses are on streets transporting passengers during the rush hour. The bus travel path will enter and exit from Jefferson Boulevard going north and east to La Cienega Boulevard and to Freeway.

1.2 GH: Does the street need to be widened to accommodate the buses?

1.3 JL: No. MTA has already traveled the path with a bus and determined there is ample width on the existing street to maneuver the buses.

1.4 JB: What time will buses leave the site in the morning?

1.5 JL: 6:00 before rush hour travel.

DL: Presented that the project is currently in the very preliminary stage of MTA and the developer establishing an agreement as MTA just got MTA Board approval to exclusively negotiate with the Developer on May 22, 2003. Environmental studies will begin when the MTA Board approves the negotiated agreement between MTA and the developer which will be in approximately 3 or more months.

1.6 BQ: Is MTA going to produce an Environmental Impact Report (EIR)?

1.7 DL: Yes, the Environmental review process will begin once the MTA Board agrees to proceed to the next stage with the project after a negotiated agreement is in place.

1.8 BQ: Will the Blair Hills receive a copy of the EIR when it is finished?

1.9 JL: Yes.

1.10 JW: The traffic light is short on Jefferson Boulevard where traffic turns left onto La Cienega. How are you going to help resolve the traffic situation?

1.11 DL: Studies will be performed on the traffic flow before the project is built, during the environmental process.

1.12 RM: Why are they selecting this site?

1.13 JL: This location is attractive to MTA because it is surrounded by commercial buildings and it is centrally located for buses traveling to various points of service within the Western/Central Service Sector.

1.14 MG: Please follow the CEQA process in evaluating the facility and do not short cut the process. How many buses are we talking about and have you talked to East Central Interceptor Sewer (ECIS) people about them removing dirt from their project site. Their trucks leave the site in the morning; will they conflict with the buses?

1.15 DL: We are in the process of interfacing with the Bureau of Sanitation and the ECIS Project Manager. We will soon learn more about how the projects would interface, if this project goes forward.

1.16 JL: Up to 150 buses could be at the site. The range is approximately 110 buses and could increase to 150.

1.17 DL: We are not certain if site capacity will reach 150 buses as we have not begun design layouts of the site.

1.18 BQ: What type of buses are CNG Buses.

1.19 JL: CNG buses are compressed natural gas buses that do use natural gas instead of diesel or gasoline. It is a clean burning fuel with little or no pollution.

1.20 JB: The buses will generate noise up the hills, is MTA going to sound proof homes along the hills?

1.21 DL: There will be noise studies conducted once the project moves to the next stage, which will help us understand what needs to be mitigated.

1.22 MG: It has been studied that the shape of the hills direct noise up the hills is the MTA going to consider this?

1.23 JL: The planning of the facility will look at sound and the use of sound absorbing materials and design techniques. (The West Hollywood facility was shown with its proximity to residences in the hills above looking down.)

1.24 JB: I am not only concerned about the noise but also oil leakage from the buses when the oil is changed and when buses are going out onto the street.

1.25 JL: Looking at the Culver City transportation facility and the recycling facility what noise are you concerned about, trucks starting up, back-up beepers , people or traffic?

1.26 JB: All of the above.

1.27 DL: It is important to us that we get your input about these issues.

1.28 JL: MTA is trying to get people to use public transportation during heavy traffic periods and out of their cars, if the Board approves the project to precede these issues will be studied and addressed.

1.29 DL: It will be approximately 2-1/2 years before the project is completed.

1.30 JW: The traffic is heavy especially while construction is going on. The entrance and exiting of the buses will impact the area. How is this going to be dealt with?

1.31 Traffic in and out of the facility will occur on Jefferson Boulevard and this would be the only major street impacted by the buses.

1.32 JW: If four buses exit at the same time it will impact the traffic on Jefferson Boulevard.

1.33 MG: Are traffic engineers going to look at these concerns and the regional impact of traffic and the interruption of traffic flow somewhere else when the traffic flow here I backed up or interrupted.

1.34 LP: Would it be a problem if buses headed to the freeway at 6:00 am and do the buses use the freeway?

1.35 JL: The buses will head to the freeway from the transportation center.

1.36 Jefferson Boulevard to La Cienega to Fairfax to the freeway. I do not know if buses will use the freeway to reach their route, some buses may.

1.37 BB: What is the facility at Washington Boulevard and the 10-Freeway?

1.38 JL: This is a layover facility for drivers to rest and use the restroom. The facility we think it is also used by the Culver City.

1.39 MG: Asked is MTA closing the Venice facility?

1.40 JL: Yes, this facility is to replace that facility.

1.41 JW: Can the Venice facility be increased in size?

1.42 DL: The facility can not be increased and if it could the location will increase the dead head miles of bus operation. Dead head miles are hours when buses are running but not servicing passengers. It is time they travel to and from their route.

1.43 JB: How long does it take to warm buses up and how much noise does this generate?

1.44 JL: I am not sure at this moment; we will provide technical information to you.

1.45 MG: Are you meeting with the homeowners association near La Brea Avenue?

1.46 JL: We have not met with them on this information yet, we are meeting with your group first.

1.47 MG: We are concerned about the aesthetics of the facility; we do not want another ugly green building. Would there be opportunities for shared parking or other mixed uses?

1.48 JL: Are you asking about other commercial uses of the site?

1.49 MG: No, but could there be a shuttle service to transport visitors of the park to parking lots located at away from the park? The park's parking lot fills up and the homeowners do not have access to the parking lot. Shared parking with a shuttle could allow access by residents to the parks parking.

1.50 JL: MTA does provide shuttle services in some other Cities, but I am not sure about a shared parking lot at this time.

1.51 JW: Can MTA donate land for parking?

1.52 JL: (Showed the West Hollywood and Culver City Facility as an example of how well they are designed.)

1.53 MG: The Culver City facility is very good.

1.54 JL: We asked National Public Radio (NPR) about sounds from the Culver City Transportation Center and if it impacted their operation and they said it has no sound problems on their facility. We will go back to the MTA Board and if they approve the project, the EIR and other studies s will begin. This is our first opportunity to meet with you; there will be additional community meetings. MTA wants to become a part of the community and this is our goal.

1.55 MG: Why do we need this facility?

1.56 JL: Because the population growth and demand for transit transportation continues to increase. MTA has to find alternatives for people to get out of their cars and use public transportation. There is a Court Ordered Consent Decree to satisfy transit demand. 20 years of studies by MTA have been performed to seek sites for facilities. Culver City shared their studies with us when they sought land for their transportation center.

1.57 MG: This will be adding buses to the public?

1.58 JL: Yes, the Venice facility has approximately 70 buses; this will increase the number of buses.

1.59 RM: Will it go up to 200 buses?

1.60 JL: No

1.61 MG: Do you have interest in beautifying the Balona Creek into a bicycle path or something attractive as a path for people to circulate and ride to the beach?

1.62 JL: We call these Transportation Enhancement Act improvements.

1.63 MG: You would get a lot of support to have this as part of the project.

1.64 JB: It seems you would want to locate this in an area where land is cheaper.

1.65 JL: We have about a dozen facilities all over Los Angeles; it is the location to service area that is important.

1.66 MG: We do want something that is attractive. We want it to enhance the neighborhood. I have seen similar facilities such as the Greyhound Bus station in San Bernardino and it is very attractive.

1.67 JL: Thanked Mary Greene for letting us use her house for the meeting and the presentation ended.

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I. INTRODUCTION

This document is an Initial Study regarding the West Los Angeles Transportation Center proposed by the Los Angeles County Metropolitan Transportation Authority (MTA), and has been prepared pursuant to Section 15063 of the California Environmental Quality Act. Its purpose is to focus the scope of inquiry to be addressed in an Environmental Impact Report (EIR) that is being prepared regarding this project.

Valuable input regarding the scope of inquiry in the EIR was received from members of communities around the project site during the noticed public scoping meeting held on December 16, 2003, at the Baha'i Center located at 5755 Rodeo Drive, Los Angeles, California 90016. Additional input was received in written submittals in response to a Notice or Preparation that was circulated for public comment from December 16, 2003 through January 5, 2004. This input, in combination with technical knowledge regarding the proposed project and the project site, has contributed to the scope of inquiry recommended herein.

In addition to the West Los Angeles Transportation Center, the EIR will address the closure of MTA's existing Division 6 Bus Maintenance Facility and its redevelopment in the Venice Community of the City of Los Angeles. The scope of inquiry regarding the development of the Division 6 facility in Venice is being recommended in a separate Initial Study regarding that property. MTA is the Lead Agency regarding the West Los Angeles Transportation Facility. However, MTA and the City of Los Angeles are sharing Co-Lead Agency status regarding redevelopment of the Division 6 facility in Venice since, while MTA is the property owner, the City is the decisionmaker regarding all entitlement actions for subsequent use.

Draft Initial Study

Metropolitan Transportation Authority West Los Angeles Transportation Center

May 2004

PCR

II. PROJECT DESCRIPTION

The Los Angeles County Metropolitan Transportation Authority (Metro), in collaboration with RAD Jefferson LLC (Project Developer), proposes to develop a new West Los Angeles Transportation Center for a fleet of clean-fuel compressed natural gas (CNG) coaches. The transportation center, once developed, will be owned and operated by Metro. The 4.66-acre property is located on the east side of Jefferson Boulevard between Rodeo Road and National Boulevard in the City of Los Angeles, as identified in the local and regional location map presented as Figure 1. This property is presently vacant and was previously used for light industrial purposes from which a few deteriorated structures remain.

The purpose of this facility is to provide improved public transit service in the central and western areas of Los Angeles County including large portions of the City of Los Angeles (including the communities of West Adams, Mid-City and South L.A., etc.) and the incorporated cities of Beverly Hills, Culver City, Malibu, Santa Monica and West Hollywood. The new transportation center will replace an existing antiquated maintenance facility inefficiently located in the Venice community on the extreme western edge of the service area. This new facility will allow Metro to expand service from a centralized location in response to growing ridership and to do so with a new clean-fuel CNG fleet replacing older diesel coaches.

The facility to be developed includes coach parking, employee parking, maintenance facilities, coach maintenance and cleaning equipment, CNG fueling facilities, fare retrieval vault houses, a tire shop, and an administration building. The facility will be designed and constructed to maintain, service, and operate a maximum of 175 CNG coaches. The administration building is proposed with as much as 9,000 square feet of floor area in a three-story structure to house coach operator dispatch, training rooms, break areas, and administrative functions. The maintenance building will contain a maximum of 20 covered maintenance bays for coach repairs and inspection, a parts distribution and storage room, and offices for maintenance administration in approximately 35,000 square feet of improved space. A parking structure for up to 300 employee vehicles will be provided. Conceptual first and second level site plans of the new transportation center are presented in Figure 2 and Figure 3. All ingress and egress for the facility will be from Jefferson Boulevard.

The facility will operate 24 hours a day, seven days a week. However, on-site activity will be higher in the early morning when the greatest number of coach operators can be expected to arrive at the facility to begin their shifts and pull buses out of the facility to go into service well before rush hour. Activity again peaks in the evening after rush hour when buses return to the facility to be cleaned, fueled and readied for service the next day. Activity will be at its slowest during morning and evening rush hour times when the vast majority of buses are away from the facility providing transit service throughout the core of the westside and central section of Los Angeles. Employees will work in shifts out of this facility with approximately 300 total employees assigned to the site. These include bus operators, mechanics, service attendants, supervisors, and management personnel.

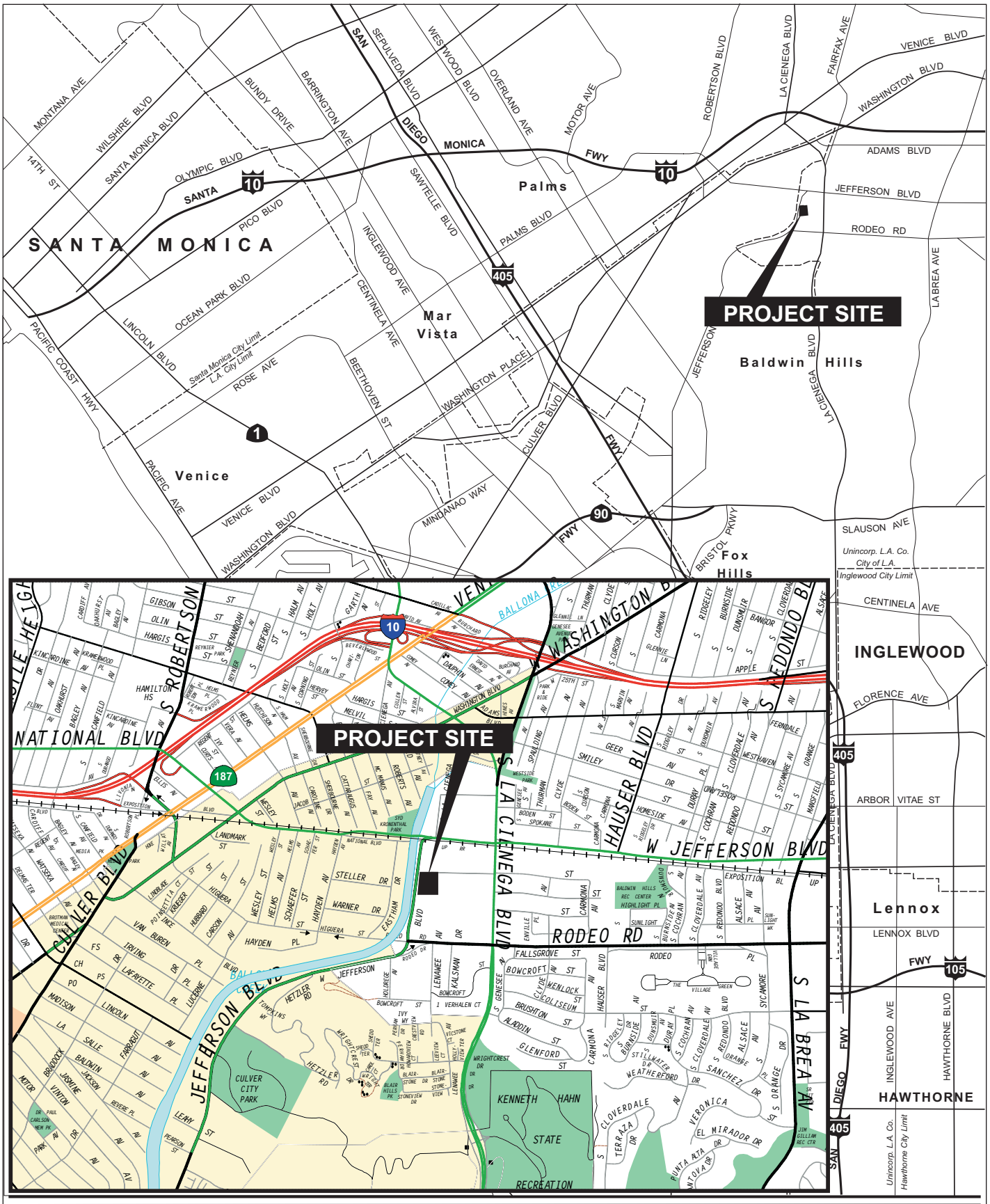

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Figure 1
Local and Regional Location Map

Source: PCR Services Corp., December 2003

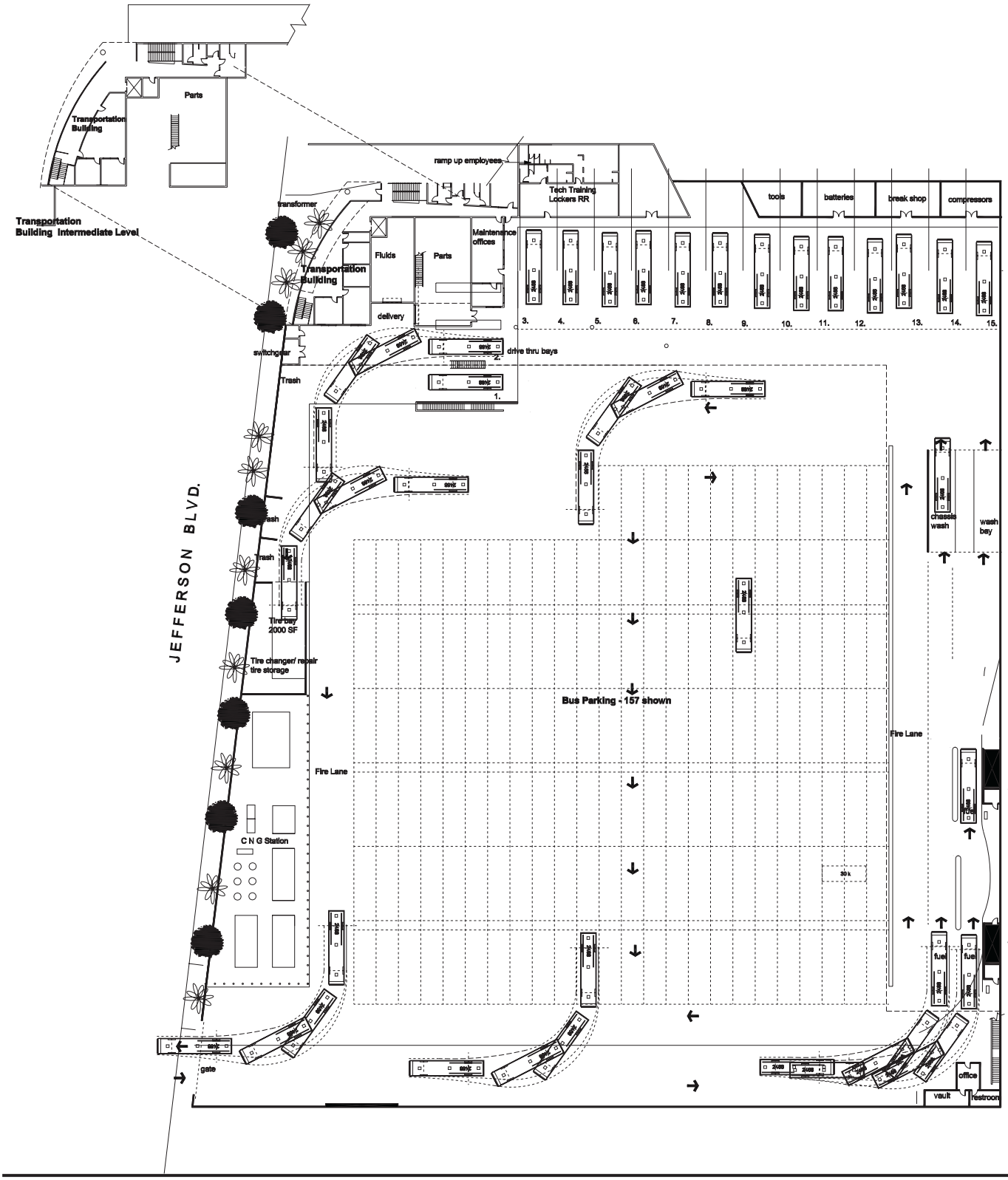

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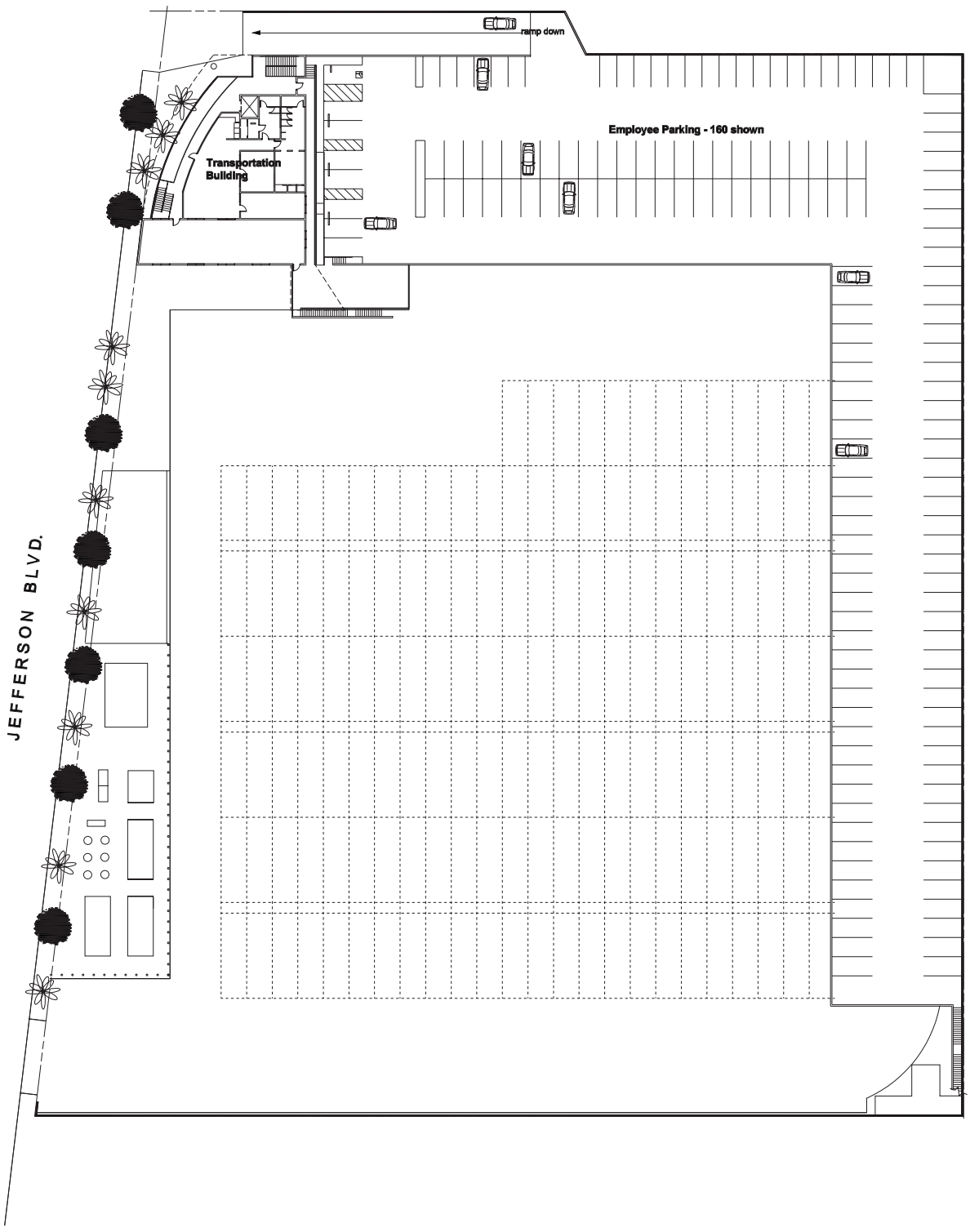
Figure 2
West Los Angeles Transportation Center
Conceptual Lower Level Plan

Source: Whitfield Associates, Inc., 2003



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Source: Whitfield Associates, Inc., 2003

Figure 3
West Los Angeles Transportation Center
Conceptual Upper Level Plan

III. ENVIRONMENTAL CHECKLIST FORM

1. **Project Title**: West Los Angeles Transportation Center

2. **Lead agency name and address:** Los Angeles County Metropolitan Transportation Authority (Metro)

3. **Contact person and phone number:** Tim Lindholm, Project Manager
   Facilities/Operations
   Telephone: (213) 922-7297

4. **Project location:** The Project site is located at 3475 South La Cienaga Boulevard in the Baldwin Hills Community of Los Angeles. The site is adjacent to Jefferson Boulevard to the west and is mid-block between National Boulevard to the north and Rodeo Road to the south.

5. **Project sponsor's name and address:** Metropolitan Transporation Authority

6. **General plan designation:** West Adams-Baldwin Hills-Leimert Community

7. **Zoning:** MR1 – Restricted Industrial Zone

8. **Description of project:** *(Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)*

   The West Los Angeles Transportation Center is proposed as an operations and maintenance facility to support a fleet of up to 175 clean-fuel compressed natural gas (CNG) coaches. The site will also include a three-story Administration Building that will house coach operator dispatch, training rooms, break areas, and administrative functions. The Maintenance Building will consist of 35,000 square feet and will contain a maximum of 20 covered maintenance bays for coach repairs and inspection, a parts distribution and storage room, and offices for maintenance administration. A parking structure will provide up to 300 employee parking spaces. All ingress and egress for the facility will be from Jefferson Boulevard. This new facility will allow the MTA to expand and improve service from a centralized location in response to growing ridership and will do so with a new clean fuel CNG fleet that will replace older diesel coaches.

9. **Surrounding land uses and setting:** *Briefly describe the project's surroundings:*

   The 4.66-acre site is located on the east side of Jefferson Boulevard between Rodeo Road and National Boulevard in a light industrial area in which the nearest residences are more than 770 feet away. Surrounding land uses are North & South – Industrial; East –

Commercial; and West – Transportation (i.e., Jefferson Boulevard).

10. **Other public agencies whose approval is required** *(e.g., permits, financing approval, or participation agreement.)*
California Department of Conservation, California Geoloigic Survey Division Development Permit.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

Preliminary assessment of all of the environmental factors listed in the Environmental Checklist herefollowing indicate that aspects of those broad categories checked below could result in a potentially significant impact and, therefore, should be analyzed in an Environmental Impact Report to determine if the project would result in a potentially significant impact.

• Aesthetics	☐ Agriculture Resources	• Air Quality
☐ Biological Resources	☐ Cultural Resources	• Geology/Soils
• Hazards/Hazardous Materials	• Hydrology/Water Quality	• Land Use/Planning
☐ Mineral Resources	• Noise	☐ Population/Housing
☐ Public Services	☐ Recreation	• Transportation/Traffic
• Utilities/Service Systems	• Mandatory Findings of Significance	

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Signature _____ Date _____

Printed Name _____ For _____

PRELIMINARY EVALUATION OF POTENTIAL ENVIRONMENTAL IMPACTS:

Issues:	**Potentially Significant Impact** [1]	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	•	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	•
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	• [1]	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	• [1]	☐	☐	☐

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	•
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	•
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	•
III. AIR QUALITY– Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	•	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	• [1]	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	• [1]	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	• [1]	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	•	☐

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	•	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	•
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	•
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	☐	☐	•	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	•
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	•
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	•
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	•
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	•	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	•	☐	☐

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	•	☐	☐
ii) Strong seismic ground shaking?	☐	•	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	•	☐	☐
iv) Landslides?	☐	☐	☐	•
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	•	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	•	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	•	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	•
VII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	• [1]	☐	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	• [1]	☐	☐	☐

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	• [1]	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	• [1]	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	•
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	•
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	•	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	•
VIII. HYDROLOGY AND WATER QUALITY– Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	•	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	•	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	•	☐

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	•	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainagesystems or provide substantial additional sources of polluted runoff?	☐	•	☐	☐
f) Otherwise substantially degrade water quality?	• [1]	☐	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	•
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	•
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	•
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	•
IX. LAND USE AND PLANNING– Would the project:				
a) Physically divide an established community?	☐	☐	☐	•
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	• [1]	☐	☐	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	•
X. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	•

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	•
XI. NOISE– Would the project result in:				
a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	• [1]	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	• [1]	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	• [1]	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	• [1]	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	•
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	•
XII. POPULATION AND HOUSING– Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	•
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	•
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	•

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	•	☐
Police protection?	☐	☐	•	☐
Schools?	☐	☐	•	☐
Parks?	☐	☐	•	☐
Other public facilities?	☐	☐	•	☐
XIV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	•
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	•
XV. TRANSPORTATION/TRAFFIC – Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	• [1]	☐	☐	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	• [1]	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	•

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	•	☐	☐
e) Result in inadequate emergency access?	☐	☐	☐	•
f) Result in inadequate parking capacity?	☐	☐	☐	•
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	•
XVI. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	•	☐	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	•	☐	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	•	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	•	☐	☐	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	•	☐	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	•	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	•

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

Issues:	Potentially Significant Impact [1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	•	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	• [1]	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	•	☐	☐

[1] *Boxes checked in this column indicate need for further analysis in an EIR. They do not indicate a conclusion.*

IV. EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS.

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The project is located in a predominately industrial corridor in the West Adams-Baldwin Hills-Leimert Community in the City of Los Angeles. The only scenic vistas in the project area are of the Santa Monica Mountains and Hollywood Hills, located northeast of the site. This vista is visible from the Baldwin Hills, located 0.5 miles south of the project site in the City of Culver City. Residents on the northeast-facing hillside of the Blair Hills neighborhood have views of the Hollywood Hills. However, these residents are at a sufficient distance and elevation from the Santa Monica Mountains and the project site that the project would have no adverse impact on their scenic vista. Therefore, no further analysis of this issue is required and no mitigation measures are recommended.

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

No Impact. According to the Caltrans Scenic Highway Program and the City of Los Angeles General Plan[1], neither Jefferson Boulevard, nor any of the roadways in the project vicinity are listed as a state scenic highway. Additionally, the project site does not have protected trees, rock outcroppings, or historic buildings. Hence, the project would have no impact on these scenic resources. Therefore, this issue requires no further investigation, nor is any mitigation recommended.

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

Potentially Significant Impact. The project site is currently vacant with a few dilapidated structures left by the site's previous occupant. The site is located within an industrial corridor, with industrial uses along both sides of Ballona Creek. The Ballona Creek flows

[1] *City of Los Angeles General Plan Transportation Element, Scenic Highways Map, June 1998.*

through this corridor but is fully channelized through this location with no original natural character. The proposed project site is visible from both sides of Ballona Creek in the immediate locale, from the Blair Hills neighborhood to the south and from the scenic overlook at Vista Pacifica, under development by the State Department of Parks and Recreation and the Baldwin Hills Conservancy. Due to the site's visibility, the potential for the project to result in a visual impact does exist. Therefore, further analysis of this issue is recommended in an environmental impact report and mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. The project will be in operation 24 hours per day, seven days per week and, therefore, will require on-site nighttime illumination sufficient for safety and security. A lighting plan has not been prepared at this time, though it may be presumed that it will generally comply with the community Design Overlay District Guidelines of the West Adams, Baldwin Hills, Leimert Community Plan. Nevertheless, evaluation of such lighting is recommended in an environmental impact report considering relative site visibility and community sensitivity. Mitigation should be considered, as appropriate.

II. AGRICULTURAL RESOURCES.

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

AND

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

AND

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No Impact (a, b, & c). The project site, and its surrounding parcels, are zoned industrial and commercial according to the City of Los Angeles' General Plan. Additionally, the Farmland Mapping Monitoring Program has designated the project site and its surrounding area as Outside

of the Survey Area. This designation means that such designated properties do not meet the criteria for Prime, Unique, or Farmland of Statewide Importance.[2] Hence, no further analysis of these issues is required and no mitigation is recommended.

III. AIR QUALITY.

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

Less Than Significant Impact. The State and Federal governments have set health standards for air pollutants, specifying levels beyond which the air is deemed unhealthful. The project site is located in the South Coast Air Basin (Basin) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is currently in non-attainment for ozone (O_3) and fine particulate matter (PM_{10}) based on Federal, and thus State, air quality standards, as the State standards for California are more stringent than the Federal standards. Together with the Southern California Association of Governments (SCAG), SCAQMD is responsible for formulating and implementing air pollution control strategies throughout the Basin. The Regional Air Quality Management Plan (AQMP) was adopted by SCAQMD in 2003 to establish a comprehensive air pollution control program that would lead to the attainment of State and Federal air quality standards.

As the project could result in increases in regional air emissions from construction, vehicle trips, and stationary sources, it could potentially affect implementation of the AQMP. In addition, as the project would add vehicle trips to the local roadways during construction and future operations, impacts relative to consistency with the Congestion Management Program (CMP) could occur. Therefore, it is recommended that these issues be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. The project site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and Federal air quality standards are often exceeded in many parts of the Basin, with Los Angeles County among the highest of the counties that compose the Basin in terms of non-attainment of the standards. The project proposes the use of clean fuel CNG coaches, to replace the diesel coaches currently used

[2] *State of California, Department of Conservation, Division of Land Resource Protection, http://www.consrv.ca.gov/DLRP/fmmp/overview/survey_area_map.htm, 2004.*

at the existing Venice Bus Depot. The use of a CNG fleet is anticipated to result in reductions in some overall criteria pollutants, specifically diesel particulates, However, the CNG fleet would be introduced to the project vicinity as a new use, hence, it is recommended that its potential effects on air quality be further analyzed. Therefore, as the project could result in increased air emissions associated with construction and operation, it is recommended that this issue be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. Since the project could result in a cumulative increase in air emissions from construction, vehicle trips, and stationary sources in a Basin that is currently in non-attainment for O_3 and PM_{10} based on Federal and State air quality standards, it is recommended that this issue be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Although the project site is located in a predominately industrial corridor, sensitive receptors are within one mile of the site. There is potential that construction operation of the project could increase pollutant concentrations. Therefore, it is recommended that this issue be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling materials used in manufacturing processes, as well as with kitchen smells associated with restaurants and commercial or institutional food preparation centers. Objectionable odors are also associated with such uses as sewage treatment facilities and landfills. Activities and materials associated with construction of the project would be typical of construction projects of similar type and size. Limited odors could be generated by on-site waste and storage, as well as the use of certain cleaning agents and landscaping activities. Odors that may be generated during construction or operation of the project would be localized and temporary in nature, and would not be expected to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Thus, impacts associated with the creation of

objectionable odors would be less than significant. Further analysis of this issue is not recommended and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES.

Would the project:

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

Less Than Significant Impact. According to a search of the California Department of Fish and Game's Natural Diversity Database (CNDDB), there are four species of endangered, sensitive, or candidate status present within a five-mile radius of the project site. However, due to the industrialized nature of the project site, and adjacent and surrounding land uses, the potential for endangered or candidate species to be present in the project area is remote. Additionally, the majority of the project site is highly disturbed from pervious industrial usage, is paved with asphalt and void of landscaping. The potential for use regular and productive use of the site by species of special protective status is also remote. Further analysis of this issue is not recommended and no mitigation measures are required.

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

No Impact. Ballona Creek is located approximately 120 feet west of the project site. The creek has been channelized for flood control purposes and all natural vegetation in or around the creek has been removed in favor of impervious surfaces. Additionally, the project site is located in a long-term industrial corridor along Jefferson Boulevard. No natural communities or riparian habitat is present on the project site nor are such resources present in the immediate project locale. Therefore, no further analysis of this issue is recommended and no mitigation is required.

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

No Impact. Ballona Creek was channelized by the Army Corps of Engineers in the late 1930's to reduce the risk of flooding. The channelization of the creek enabled development to fill in previously flood prone areas that formerly supported wetland habitats. The remaining wetland areas associated with the creek are located west of the San Diego Freeway in the City of Los Angeles Community of Playa del Rey. No wetlands are present on the project site. Hence, the project will not adversely effect federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no further analysis of this issue is required and no mitigation is recommended.

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

Less Than Significant Impact. The project site is not proximate to known wildlife corridors or nearby habitats that may be sought by wildlife in passage or migration. It is entirely fenced and is situated in an industrial area served by major arterial roadways, the combination of which is not conducive to wildlife movement. The potential for the project site to support any species identified as a candidate, sensitive, or special status species is remote. Therefore, further analysis of this issue is not recommended and no mitigation measures are required.

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

No Impact. The City of Los Angeles has established an Oak Tree Ordinance that regulates the removal and replacement of oak trees. However, no oak trees are present on the project site. Therefore, no further analysis of this issue is recommended and no mitigation is necessary.

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

No Impact. According to the City's General Plan and the West Adams-Baldwin Hills-Leimert Community Plan, there are no established habitat conservation or natural community

conservation plans for the project area. No further analysis of this issue is recommended and no mitigation is necessary.

V. CULTURAL RESOURCES.

Would the project:

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

No Impact. According to the City of Los Angeles' Cultural Monument list, one listed property is located within one half mile of the project site. The listed property is the Collins-Furthmann Mansion located at 3801 Lenawee Avenue, which was declared for listing in June of 1990.[3] There are no California Points of Historical Interest, California Historical Landmarks, or properties listed on the National Register of Historic Places or the California Register of Historical Resources located within a one half-mile radius of the project site. Also, the California Historic Resources Inventory lists no properties that have been evaluated for historical significance within a one half-mile radius of the project site. No historic resources are present on the project site, nor is the one historic resource, cited above, within proximity where the project could result in an adverse effect. Therefore, no further analysis of this issue is recommended and no mitigation is necessary.

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

No Impact. According to a records search conducted by the South Central Coastal Information Center, there are no archaeological sites located within the project site.[4] Although four archaeological sites have been identified within a one half-mile radius of the project site, these sites are not listed on the Archaeological Determination of Eligibility (DOE) list. Therefore, no further analysis of this issue is recommended and no mitigation is necessary.

[3] *South Central Coastal Information Center, California Historical Resources Information System, California State University – Fullerton, March 2004.*

[4] *Ibid.*

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

Less Than Significant With Mitigation Incorporated. The paleontological sensitivity of the proposed project area is considered to be of high potential.[5] The uppermost few feet of soil in the proposed project area are unlikely to contain significant fossil remains, especially if they have been disturbed by prior construction activities. At depth, however, there is potential to encounter significant vertebrate fossils, as nearby localities have produced such resources at depths as shallow as six feet. Given this understanding, which further research cannot advance, further investigation in an environmental impact report is not required. However, mitigation is considered necessary.

Mitigation V.c.1.: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less than significant levels.

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

Less Than Significant With Mitigation Incorporated. The discovery of human remains from recent, historic or prehistoric periods on any property not already identified in association with such remains is remote. The project site and the immediate surroundings are not already identified with previous accidental discoveries of human remains. Nevertheless, accidental discovery does occur. Therefore, while such discovery is highly unlikely, and further evaluation in an environmental impact report is inappropriate, precautionary mitigation is necessary.

Mitigation V.d.1: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources

[5] *South Central Coastal Information Center, California Historical Resources Information System, California State University – Fullerton, March 2004.*

would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e).

VI. GEOLOGY AND SOILS.

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant With Mitigation Incorporated. The project site is located on a delineated Alquist-Priolo Earthquake Fault Zoning Map.[6] The delineated rupture zone is divided between the Beverly Hills and Hollywood Quadrangles and is a result of earthquake activity on the Inglewood-Newport fault. According to the Alquist-Priolo Earthquake Fault Zoning Act of 1975, Article 3, the project would be required to prepare a geological and/or geotechnical report and to submit an application for a Development Permit.[7] Therefore, it is recommended that this issue be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

ii) Strong seismic ground shaking?

Less Than Significant With Mitigation Incorporated. The project site is located in a delineated Alquist-Priolo rupture zone. Due to southern California's documented history of seismic activity, strong ground shaking is expected to occur during the life of the project. Any of the active faults in southern California could produce seismic ground shaking that may affect the project site. Therefore, it is recommended that this issue be analyzed further in an EIR with feasible mitigation measures incorporated as necessary.

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[6] *California Department of Conservation, Division of Mines and Geology, Digital Images of Official Maps of Alquist-Priolo Earthquake Fault Zones of California, Southern Region, 2000.*

[7] *Alquist-Priolo Earthquake Fault Zoning Act, Article 3. Policies and Criteria of the State Mining and Geology Board. Updated November 14, 2003.*

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant With Mitigation Incorporated. According to the Seismic Hazard Zone Map for the Beverly Hills quadrangle, the project site is located over a delineated liquefaction hazard zone.[8] Locations susceptible to liquefaction generally exhibit four conditions: potential for seismic activity, cohesionless soils (e.g., sand and silt), groundwater within 50 feet of ground surface, and soil densities of less than 70 percent.[9] The Geotechnical Engineering Study prepared for the project indicates that the site's soils meet all four liquefaction conditions and is susceptible to liquefaction. Therefore, it is recommended that this issue be analyzed further in an EIR with feasible mitigation measures incorporated as necessary.

iv) Landslides?

No Impact. The project site is located on relatively flat parcel in the Los Angeles Basin. Although the Baldwin Hills are within the project vicinity, and are delineated as a landslide hazard area, they are approximately one-half mile to the south of the project site. Should a seismically induced landslide occur in the Baldwin Hills it is not anticipated that it would have an adverse impact on the site. Hence, no further analysis of this issue is recommended, nor is mitigation required.

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

Less Than Significant Impact. According to the Geotechnical Report, the soils on the project site are not highly erosive.[10] Additionally, a review of preliminary plans show that the site would be predominately covered in impervious surfaces, effectively reducing any of the underlying soils from contact with irrigation water or precipitation. Hence, no further analysis of this issue is recommended, nor is mitigation required.

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

Less Than Significant With Mitigation Incorporated. The project site has geologic conditions that exhibit potential for liquefaction. Additionally, the Geotechnical Study has

[8] *California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone Map Series, Beverly Hill Quadrangle, March 1999.*

[9] *Ibid.*

[10] *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study, July 2003.*

identified that the soils may also be susceptible to hydroconsolidation (collapse). Therefore, it is recommended that this issue be analyzed further and documented in an EIR with feasible mitigation measures incorporated, as necessary.

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

Less Than Significant Impact. The Geotechnical Study has concluded that the soils below the project site exhibit potential for hydroconsolidation, yet do not show potential for expansion. Therefore, it is not recommended that this issue be analyzed further and no mitigation measures are recommended.

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

No Impact. Wastewater services for the project would be provided by the City of Los Angeles' Bureau of Sanitation. These services are already located in the project area and are supported by the area's soils. Neither septic tanks nor alternative wastewater disposal systems would be utilized for this project. No further analysis of this issue is recommended and no mitigation measures are required.

VII. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

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

Potentially Significant Impact. According to the Phase I Addendum, the project site shows potential presence of contaminated soils and groundwater, which requires further Phase II investigation.[11] Remediation and disposal of contaminated materials would need to occur prior to project construction. These remediation efforts may require the transportation and disposal of contaminated soils removed from the site. Additionally, during the operational phase of the proposed project, the Transportation Center would be the destination of routine transport of

[11] *Phase I Environmental Site Assessment Addendum prepared by Environmental Support Technologies, Inc., October 2003.*

compressed natural gas, petrochemicals, and other potentially hazardous materials related to the maintenance of the coach fleet. Therefore, further investigation of this issue in an EIR is recommended with mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. The project site's existing and proposed conditions have the potential to release hazardous materials into the environment. Further investigation of this issue in an EIR is recommended with mitigation measures incorporated, as necessary.

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

Potentially Significant Impact: The Echo School, a private elementary school is located at 3430 McManus Avenue, approximately 1000 feet, or 0.20 miles northwest of the project site in the City of Culver City. Similarly, another private elementary school—The Willows Community School—is located at 8509 Higuera Street, approximately 1,500 feet southwest of the site.[12] Therefore, it is recommended that this issue be analyzed further in an EIR with mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. The project site is documented on the Cortese List (i.e., Government Code Section 65962.5) for an underground storage tank (UST) leak and the remedial actions related to that leak. Additionally, the site is known to be contaminated from the site's previous use that has affected the site's soils and groundwater. Additionally, a subsurface groundwater plume of gasoline contamination from an off-site source threatens the site's groundwater resources. Therefore, it is recommended that this issue be analyzed further in an EIR with mitigation measures incorporated, as necessary.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport,

[12] *Thomas Brothers Guide for Los Angeles and Orange Counties, 2004.*

would the project result in a safety hazard for people residing or working in the project area?

AND

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

No Impact (e & f). The project site is not located within two miles of a pubic or private airport; hence, it would not result in an aircraft or airport-related safety hazard for people residing or working in the project area. No further analysis of this issue is recommended and no mitigation measures are required.

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

Less Than Significant Impact. Ingress and egress from the project site would occur along Jefferson Boulevard. Jefferson Boulevard, along with Rodeo Road (to the south), are both designated as Selected Disaster Routes and would need to remain accessible during construction of the Project.[13] It is not anticipated that street closure would be necessitated by construction of the project, however, these roadways may experience an increase in large truck volumes and trips during site demolition, land clearing, and excavation/hauling of materials. Because the project would not result in any closures of designated emergency routes, it would be consistent with emergency response/evacuation plans developed by the City of Los Angeles. No further analysis of this issue is recommended and no mitigation measures are required.

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

No Impact. The project site is located in an industrial corridor in a heavily urbanized area within the City of Los Angeles. The Baldwin Hills, located in the City of Culver City, are to the south of the project site. These hills are punctuated by development with the remaining areas designated as parkland and open space. These open space areas are not classified as wildlands, hence, no wildlands are present in the project area. No further analysis of this issue is recommended and no mitigation measures are required.

[13] *City of Los Angeles General Plan Framework - Safety Element H – Critical Facilities and Lifeline Systems, April 1994.*

VIII. HYDROLOGY AND WATER QUALITY.

Would the project:

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

Less Than Significant With Mitigation Incorporated Project-related construction activities have the potential to affect surface water quality as the result of minor soil erosion (during grading and soil stockpiling), subsequent siltation, and conveyance of other pollutants into municipal storm drains during the project construction phase. Additionally, the proposed project's operational activities could have adverse impacts on water quality discharged from the site. The site would have fueling stations, coach and tire washing, maintenance bays, and parking for both the bus fleet and the employee vehicles. Residual petrochemicals, brake pad asbestos, and other toxic vehicle-related substances could leak or spill onto the site's impervious surface, resulting in the potential for these substances to contaminate storm waters that would be discharged from the site. Therefore, further analysis of this issue in an EIR is recommended with mitigation measures incorporated, as necessary.

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

Less Than Significant Impact. The project site is located on the west side of the City of Los Angeles and is not located over a regional groundwater basin nor a spreading ground for groundwater recharge.[14] Groundwater levels in the City of Los Angeles are maintained through an active process via spreading grounds and recharge basins. Although open spaces do allow for seepage of water into smaller unconfined aquifers, the larger groundwater sources within the City of Los Angeles are actively recharged and supply the City with approximately 11 percent of its water supply.[15] Additionally, groundwater use is regulated by the City of Los Angeles and no private wells are located on the project site.[16]

[14] *Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure WR-1, January 1995.*

[15] *City of Los Angeles Department of Water and Power, Urban Water Management Plan, 2001-2002.*

[16] *Geotechnical Engineering Study, prepared by Advanced Geotechnical Services, Inc., October 2003.*

Hence, although the project would result in a predominately impervious site, this would not result in a significant change from the existing conditions, nor would project-related changes substantially interfere with groundwater recharge in the City's active aquifers. Therefore, there would not be a net deficit in aquifer volumes or a substantial lowering of the local groundwater table. Therefore, impacts associated with groundwater supplies or groundwater recharge would be less than significant. Further analysis of this issue is not recommended and mitigation measures would not be required.

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

Less Than Significant Impact. Construction activities have the potential to result in limited soil erosion in the very early phases before site excavation has lowered site elevation below adjoining properties. However, project construction will comply with applicable provisions of the County's National Pollutant Discharge Elimination System (NPDES) permit. Therefore, the project is not expected to have significant soil erosion impacts. Further analysis of this issue in an EIR is not recommended and additional mitigation measures are not considered necessary.

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

Less Than Significant Impact. The project would result in predominately impervious surfaces covering the majority of the site, although the existing site is mostly impervious already. While an increase in imperviousness could contribute to a limited increase in the amount of surface runoff and possibly a limited increase in the rate of runoff from the site, such would not be expected to cause flooding either on-site or in the project locale. Hence, further analysis of this issue is not recommended and mitigation measures are not considered necessary, beyond normal engineering requirements.

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

Less Than Significant With Mitigation Incorporated. The project's site location immediately across Jefferson Boulevard form the Ballona Creek Channel, which is the major element of stormwater infrastructure in the West Los Angeles area, indicates that drainage

deficiencies in the project locale would not occur except in the most extreme storm events. The limited amount of additional runoff from the project site that the project could cause would not affect this conclusion. Further study of the project's hydrological effects in an environmental impact report is not recommended and additional mitigation beyond normal engineering provisions is not considered necessary.

The project would be supporting operating activities that could be sources of polluted runoff. The buses, although running on compressed natural gas (CNG), are still powered by internal combustion engines that require petrochemicals and coolants that have the potential to leak from the vehicles over time. Additionally, the project would include a CNG fueling station, storage containers for new and used oils, a bus washer, parking for up to 175 buses and 200 employees, trash storage units, and maintenance bays. These uses have potential to pollute runoff from the site if engineering precautions are not implemented. Further analysis of this issue in an EIR is recommended and mitigation measures incorporated, as necessary.

f) Otherwise substantially degrade water quality?

Less Than Significant With Mitigation Incorporated. The project has potential during construction and subsequent operations to result in an adverse impact on surface water quality. Further analysis of this issue in an EIR is recommended with mitigation measures incorporated, as necessary.

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

AND

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

No Impact (g & h). According to the Federal Emergency Management Agency's (FEMA) Federal Insurance Rate Map Number 0601370079D, the project site is delineated as Zone C[17]. Zone C is defined as an area of minimal flooding or outside of the 500-year flood plain, with an annual probability of flooding of less than 0.2 percent. Similarly, the City of Los Angeles Safety Element Exhibit F shows the same delineated flood plain areas. [18] Hence, the

[17] *Federal Emergency Management Agency FIRM Map Panel 060137007D, December 1980.*

[18] *City of Los Angeles General Plan Framework – Safety Element Exhibit G: Inundation & Tsunami Hazard Areas, March 1994.*

project would not place housing or other structures within a delineated 100-year flood hazard zone. Therefore, no further analysis of this issue is recommended and no mitigation measures are required.

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

AND

j) Inundation by seiche, tsunami, or mudflow?

No Impact (i & j). According to the City of Los Angeles General Plan Framework, the project site is mapped as an inundation zone.[19] Should Los Angeles experience an earthquake sufficient to cause the failure of reservoirs in the Santa Monica Mountains or Hollywood Hills, the project site could conceivably be inundated by waters from Hollywood, Stone Canyon, or Silver Lake Reservoirs. However, each of these reservoirs has been reinforced. Several large-scale earthquakes have occurred in the Los Angeles Basin in the last fifty years (e.g., the Northridge earthquake) and none of these dams have suffered major damage or failure. Therefore, development of the project is not anticipated to introduce a greater risk to people or structures associated with inundation or flooding from dam failure. Further analysis of this issue in and environmental impact report is not recommended nor is mitigation required.

The inundation map referenced above indicates that the project site is not delineated as a potential run-up zone from inundation by a seiche or tsunami. Additionally, due to the site's distance from the Baldwin Hills (i.e., one half mile), the risk of inundation from mudflows is considered extremely remote. No further analysis of this issue in an environmental impact report is recommended nor is mitigation required.

[19] *Ibid.*

IX. LAND USE AND PLANNING.

Would the project:

a) Physically divide an established community?

No Impact. The project site is located in an industrial corridor within the City of Los Angeles. The site is zoned for light industrial use and is surrounded by parcels zoned for, and in use with, light industrial and commercial uses. The nearest residential land uses are approximately 770 feet south of the project site, in the complex of Cameo Woods in the City of Los Angeles. No community would be physically divided by the project and no impacts would occur. Further analysis of this issue is not recommended nor is mitigation required.

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

Potentially Significant Impact. The project site is currently zoned MR-1 for light industrial use and the project would be consistent with the uses permitted under that zoning designation. However, as the site is currently vacant, the proposed project would intensify the use of the site in relation to its current land use. It is recommended that this issue be evaluated in an environmental impact report to inform the surrounding communities of the potential environmental effects from intensifying the land use of the project site and incorporate mitigation, as appropriate.

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

No Impact. Neither the Los Angeles General Plan nor the West Adams-Baldwin Hills-Leimert Community Plans have adopted habitat or natural community conservation plans for the project area. Hence, construction and operation of the proposed project would not conflict with biological conservation plans. Therefore, no impacts would result. No further analysis of this issue is recommended nor is mitigation required.

X. MINERAL RESOURCES.

Would the project:

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

No Impact. The project site is not listed as a potential or existing mineral resource extraction area for the State of California.[20] Additionally, the project site's land use, as defined by the City of Los Angeles General Plan and the West Adams-Baldwin Hills-Leimert Community Plan, is not designated for mineral extraction. As such, implementation of the project would not result in the loss or availability of a known mineral resource that would be of value to the region and the residents of the State and no impacts would occur. Further analysis of this issue is not recommended and no mitigation measures would be required

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

No Impact. The project site is not located within a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, implementation of the project would not result in a loss of any locally important mineral resources recovery sites and no impacts would occur. Further analysis of this issue is not recommended and no mitigation measures would be required.

XI. NOISE.

Would the project result in:

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

Potentially Significant Impact. The proposed project could result in an increase in noise levels associated with construction and subsequent operation of the project. It is

[20] *California Department of Conservation, Division of Mines and Geology/U.S. Geologic Survey, Minerals Yearbook: The Mineral Industry of California, 2001.*

recommended that this issue be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. Short-term groundborne noise and vibration could result from project-related construction activities and operation of the proposed project could result in the generation of excessive groundborne vibration or groundborne noise. Therefore, it is recommended that this issue be analyzed further in an EIR with mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. The project has the potential to increase the ambient noise levels in the project vicinity. Therefore, it is recommended that this issue be analyzed further in an EIR with mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. Construction related activities and equipment used during the project's construction phase could result in a temporary or periodic increase in ambient noise levels above those present without the project. Therefore, it is recommended that this issue be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

No Impact. The proposed project is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport to the project is the Los Angeles International Airport, located approximately 5.8 miles south of the project site. Therefore, the project would not expose people to excessive noise levels from airport operations and no impacts would occur. Further analysis of this issue is not recommended and no mitigation measures would be required.

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

No Impact. The project site is not located within the vicinity of a private airstrip. Therefore, the project would not expose people to excessive noise levels associated with the operation of a private airstrip and no impacts would occur. Further analysis of this issue in an EIR is not recommended and no mitigation measures should be required.

XII. POPULATION AND HOUSING.

Would the project:

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

No Impact. The project does not involve the construction of new residences. As such, its implementation would not generate a direct increase in the permanent population of the area or cumulatively exceed regional or local population projections. It is not anticipated that the proposed project would induce population growth in the local residential areas in proximity to the project site since MTA's overall employee roster is not expected to increase due to this project and MTA employees reside throughout the region. No impacts associated with induced population growth would occur. Further analysis of this issue is not recommended and no mitigation measures would be required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. There are no existing housing units within the project site. Therefore, implementation of the proposed project would not result in the displacement of any housing nor would it necessitate the construction of replacement housing. No impacts would occur. Further analysis of this issue is not recommended and no mitigation measures would be required.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. Since there are no existing housing units within the project site, the project would not result in the displacement of people, nor would it necessitate the construction of

replacement housing elsewhere. No impacts would occur. Further analysis of this issue is not recommended and no mitigation measures would be required.

XIII. PUBLIC SERVICES

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

i) Fire protection?

Less Than Significant Impact. Fire protection and emergency medical services are provided by the Los Angeles Fire Department (LAFD). Three LAFD fire stations would continue to provide fire protection to the project site and the project vicinity in an emergency situation. Stations No. 58, 68, and 94 are located at 1556 South Robertson Boulevard (1.9 miles northwest), 5023 Washington Boulevard (2.0 miles northeast), and 4470 Coliseum Street (1.8 miles southeast), respectively. Each station had a different array of equipment to address various types of emergency situations. The stations are equipped as follows: (1) Station No. 58 is a two-engine company with a fire truck and a rescue unit, (2) Station No. 68 is a single-engine company with two rescue units, and (3) Station No. 94 is a double-engine company with a fire truck, two rescue units and a brush unit.

LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis to determine if additional equipment, personnel, or facilities are warranted.[21] The project would not result in a substantial increase in employees within the immediate project area, therefore existing fire service levels in the area would not be significantly affected. The project would result in an increase of approximately 35,000 square feet of floor area. The new administrative and maintenance buildings would include fire sprinklers, fire alarm devices, and other approved fire safety technologies in compliance with local and State code requirements for "E" occupancies (including NFPA 101 – State Fire Code). In addition, project design would incorporate emergency access through the site, allowing LAFD to adequately respond to potential on-site emergencies. Based on this information, the proposed project would not necessitate the addition of a new fire station or alteration in equipment or personnel. Thus,

[21] *City of Los Angeles, Citywide General Plan Framework, December 1996.*

impacts on fire protection services would be less than significant. Further analysis of this issue is not recommended and no mitigation measures would be required.

ii) Police protection?

Less Than Significant Impact. The MTA contracts its police protection of its light rail lines and the bus lines/stops to the Los Angeles County Sheriff's Department (LASD). However, the new Transportation Center would be within the jurisdiction of the South Bureau of the Los Angeles Police Department (LAPD). The project site is located within the Southwest Area of the LAPD's South Bureau, which includes approximately 13.1 square miles. The Southwest Community Police Station is located at 1546 West Martin Luther King Boulevard, and would be responsible for patrolling the area around the project site and responding to on-site calls. Although the Transportation Center would have as many as 300 employees spread across shifts swerving a continuous 24-hour, seven-day schedule, such increases would not have a substantial impact on police protection services including the need for additional or altered LAPD facilities, equipment, or officers. Therefore, impacts to police protection services would be less than significant. Further analysis of this issue is not recommended and no mitigation measures would be required.

iii) Schools?

Less Than Significant Impact. Los Angeles Unified School District (LAUSD) and the Culver City Unified School District (CCUSD) provide public school services in the project area. The project does not involve the construction of new dwelling units. Therefore, a direct impact on the demand for additional classroom space within LAUSD or CCUSD would not occur. It is anticipated that employees that are currently employed at the Venice Division 6 Bus Depot would transfer over to the new facility without changing their individual residential locations. As such, the project would not result in a need for new or altered public school facilities and no significant impacts would occur. Further analysis of this issue is not recommended and no mitigation measures would be required

iv) Parks?

Less Than Significant Impact. Implementation of the project would not generate a demand for existing parks or require the development of new parks in the adjacent vicinity. No impact on parks within the project vicinity would occur. Further analysis of this issue is not recommended and no mitigation measures would be required.

v) Other public facilities?

Less Than Significant Impact With Mitigation Incorporated. The proposed project would result in the continued need for other governmental services, including roads. Implementation of the proposed project would result in additional local vehicle trips associated with construction and operation. It is recommended that the additional use of local roadways and additional need for associated street maintenance should be addressed in an EIR under the topic of Transportation and Circulation, with mitigation as appropriate. The proposed project would not have an effect upon or result in a need for other new or altered government services. Further analysis of this issue, except as regards street maintenance, is not recommended and no mitigation measures would be required.

XIV. RECREATION

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

No Impact. Implementation of the proposed project would not result in the development of residential uses and would not be expected to introduce an employee population that would increase the demand for neighborhood or regional parks or other recreational facilities. Therefore, impacts associated with the demand for recreational facilities would not occur. Further analysis of this issue is not recommended and no mitigation measures would be required.

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

No Impact. The project does not include nor require the construction or expansion of recreational facilities. Further analysis of this issue is not recommended and no mitigation measures would be required.

XV. TRANSPORTATION AND CIRCULATION.

Would the project:

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

AND

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact. Construction of the project would result in a temporary increase in traffic associated with construction-related vehicles. Additionally, the addition of approximately 300 employees, plus the daily movement of up to 175 coaches would generate an increase in local vehicle trips on roadways within the project vicinity. Therefore, it is recommended that the following traffic-related issues be analyzed in an EIR: (1) the potential for the project to cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, or (2) to exceed, either individually or cumulatively, a level of service standard established by MTA's Congestion Management Plan. The EIR shall recommend feasible mitigation measures, as appropriate.

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

No Impact. The project site is not located within two miles of a public or private airport, nor does the project include an air transportation component. The project would have no adverse impact on air traffic patterns or air traffic safety. No further analysis of this issue is recommended and no mitigation measures would be required.

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

Less Than Significant With Mitigation Incorporated. The proposed project would not include the alteration of the existing roadways surrounding the project site or roadways comprising the proposed bus routes. The project proposes all ingress and egress onto Jefferson

Boulevard with the potential for creating a signalized intersection to allow for safe bus turn movements at that access point. It is recommended that the feasibility of the coach fleet to safely negotiate the local street system be evaluated in an EIR with feasible mitigation measures incorporated, as necessary.

e) Result in inadequate emergency access?

No Impact. The Transportation Center would be designed to ensure suitable movement of the MTA coaches on the site as well as at the ingress and egress from Jefferson Boulevard. Emergency vehicles would have no difficulties gaining access to or navigating within the project site. Therefore, the proposed project would not result in inadequate emergency access. Therefore, further analysis of this issue is not recommended and no mitigation measures would be required.

f) Result in inadequate parking capacity?

No Impact. One of the purposes of the project is to provide adequate parking for the new MTA coaches as well as on-site parking for the administrative staff and other employees. The preliminary design would provide parking for approximately up to 175 coaches and 300 parking spaces for employee parking. All coaches in the fleet and all of the employees would not be on-site at one time. Due to the rotating employee shifts, and the route schedules, the proposed parking would be adequate for both the coach fleet and the employees. The project would provide adequate parking and therefore would not result in an adverse impact. No further analysis of this issue is recommended and no mitigation measures would be required.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact. The project is proposed as an important element in the region's alternative transportation program. Moving the Transportation Center to the proposed project site would enhance the regions alternative transportation by centralizing the starting point to the routes that the coaches travel throughout the day from the existing facility in Venice at the extreme western edge of the MTA service area. The new location would facilitate necessary on-route maintenance, in-shop maintenance with return to scheduled routes, and route realignment over time. Hence, the project would not only be consistent with, but is actually a part of, alternative transportation plans for the region. No further analysis of this issue is recommended and no mitigation measures would be required.

XVI. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Potentially Significant Impact. The existing wastewater system in the project area may not have the capacity to accommodate the wastewater discharge levels projected for the project. Hence, the potential for wastewater treatment requirements to be exceeded by the project could result in an adverse impact on utilities. Therefore, further analysis of this issue in an EIR is recommended with feasible mitigation measure incorporated, as necessary.

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

Potentially Significant Impact. The capacity of the area's existing water or wastewater service may not be sufficient to serve the proposed project. Therefore, construction of the project could result in the need for expansion of either water or wastewater utility systems that may cause significant environmental effects. Further analysis of this issue in an EIR is recommended with feasible mitigation measure incorporated, as necessary.

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

Less Than Significant Impact. The project site is located immediately east of the Ballona Creek Flood Control Channel. As a major element of the Los Angeles Stormwater System, its presence indicates that drainage deficiencies in the project locale would not occur. The project would add a limited amount of stormwater runoff to the existing facilities, hence, the project would not result in a need for new stormwater drainage facilities. Further analysis of this issue is not recommended and no mitigation is necessary

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

Potentially Significant Impact. The potential that existing water entitlements are not sufficient to cover the needs of the proposed project does exist. Therefore, further analysis of this issue in an EIR is recommended with feasible mitigation measure incorporated, as necessary.

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

Potentially Significant Impact. The capacity of the area's existing wastewater service may not be sufficient to serve the proposed project. Further analysis of this issue in an EIR is recommended with feasible mitigation measure incorporated, as necessary.

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

Less Than Significant Impact. The project would not significantly expand MTA's overall solid waste generation. Regional landfills generally have 10 years of solid waste capacity and new capacity will be proposed as needs dictate. Therefore, further analysis of this issue in an EIR is not recommended and additional mitigation would not be necessary.

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

No Impact. The proposed project would comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. The project would promote compliance with the California Integrated Waste Management Act (AB 939), which mandates that 50 percent of the solid waste in the state be diverted from landfills (effective 2000). Further analysis of this issue in an EIR is not recommended and additional mitigation would not be necessary.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare

or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant With Mitigation Incorporated. As discussed in more detail in Section IV above, the proposed project would not degrade the environment in ways that would reduce the habitat of wildlife species, nor would the project adversely effect important examples of the major periods of California History or prehistory, with implementation of recommended mitigation measures to account for accidental discovery.

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

Potentially Significant Impact. The project's contribution to potential cumulative impacts associated with each of the topical issues discussed above was considered. It was determined that the project would not contribute to cumulative impacts associated with agricultural resources or mineral resources, as there are no such resources in the immediate project area. In addition, due to the developed nature of the project area and the area in the vicinity of the proposed related projects, the project would not contribute to significant cumulative impacts associated with biological resources, population and housing, public services, or recreation. However, it is recommended that the project's potential contribution to cumulative impacts associated with aesthetics, air quality, geology and soils, water quality, noise, and transportation be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

Potentially Significant Unless Mitigation Incorporated. Construction and operation of the proposed project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. These potential effects could be associated with aesthetics, air quality, geology and soils, water quality, noise, and transportation. It is recommended that these potential impacts be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

Sunset Avenue Project

A2 – Sunset Avenue Project

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

CITY PLANNING COMMISSION

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March 25, 2004

NOTICE OF PREPARATION AND NOTICE OF PUBLIC SCOPING MEETING

EAF NO: ENV-2004-1407
PROJECT NAME: Sunset Avenue Project (Venice)

PROJECT DESCRIPTION: The project proposes a Tentative Tract Map (condominium), a Zone Change from M1 to CM, a Specific Plan Exception for height, a Coastal Development Permit, a Specific Plan Project Permit, and any other discretionary actions as may be determined necessary to redevelop the site into a largely residential development with some retail uses. Following the completion of the Los Angeles County Metropolitan Transportation Authority's (MTA) new West Los Angeles Transportation Center, to be located on Jefferson Boulevard between Rodeo Road and National Boulevard, the existing Division 6 Bus Depot on the project site, would be permanently vacated by the MTA. The existing structures would be removed and any contamination associated with the site's previous use remediated. A total of 225 residential condominiums are proposed (167 market rate dwellings and 58 affordable dwellings) in a product mix of one- and two-bedroom units. In addition, approximately 13,500 square feet of retail space is proposed in a ground floor setting to be occupied by café and restaurant uses, though up to 7,000 square feet may house a health club. Two levels of subterranean parking for 650 to 750 vehicles are included in the project. For a detailed project description, please see Attachment A.

PROJECT ADDRESS: 100 East Sunset Avenue
COMMUNITY PLAN AREA: Venice
COUNCIL DISTRICT: 11
COMMENTS DUE DATE: **April 26, 2004**

PUBLIC SCOPING MEETING:
DATE: Wednesday April 7, 2004
TIME: 6:30 to 8:30 P.M.
LOCATION: Westminster Elementary School (GYM)
1010 Abbot Kinney Boulevard, Venice.

AREAS OF POSSIBLE ENVIRONMENTAL IMPACT: Aesthetics, Air Quality, Geology/Soils, Hazards/Hazardous Materials, Land Use/Planning, and Transportation/Traffic.

This notice and attached materials describe a proposed land development project and suggest possible environmental impacts of the project, which lies in an area that has been determined to be of interest to you and/or the organization you represent. An Environmental Impact Report (EIR) is to be prepared regarding this project by this office. We welcome all comments on the possible environmental impacts of the proposed project so that we can take them into consideration in the preparation of the EIR. All comments should be in writing and must be submitted to this office by **April 26, 2004**.

Please direct your responses to:

Jimmy Liao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, CA 90012
(213) 978-1331
(213) 978-1343 (fax)
E-Mail: JLIAO@planning.lacity.org

Con Howe
Director of Planning

Jimmy C. Liao
City Planner, EIR Unit

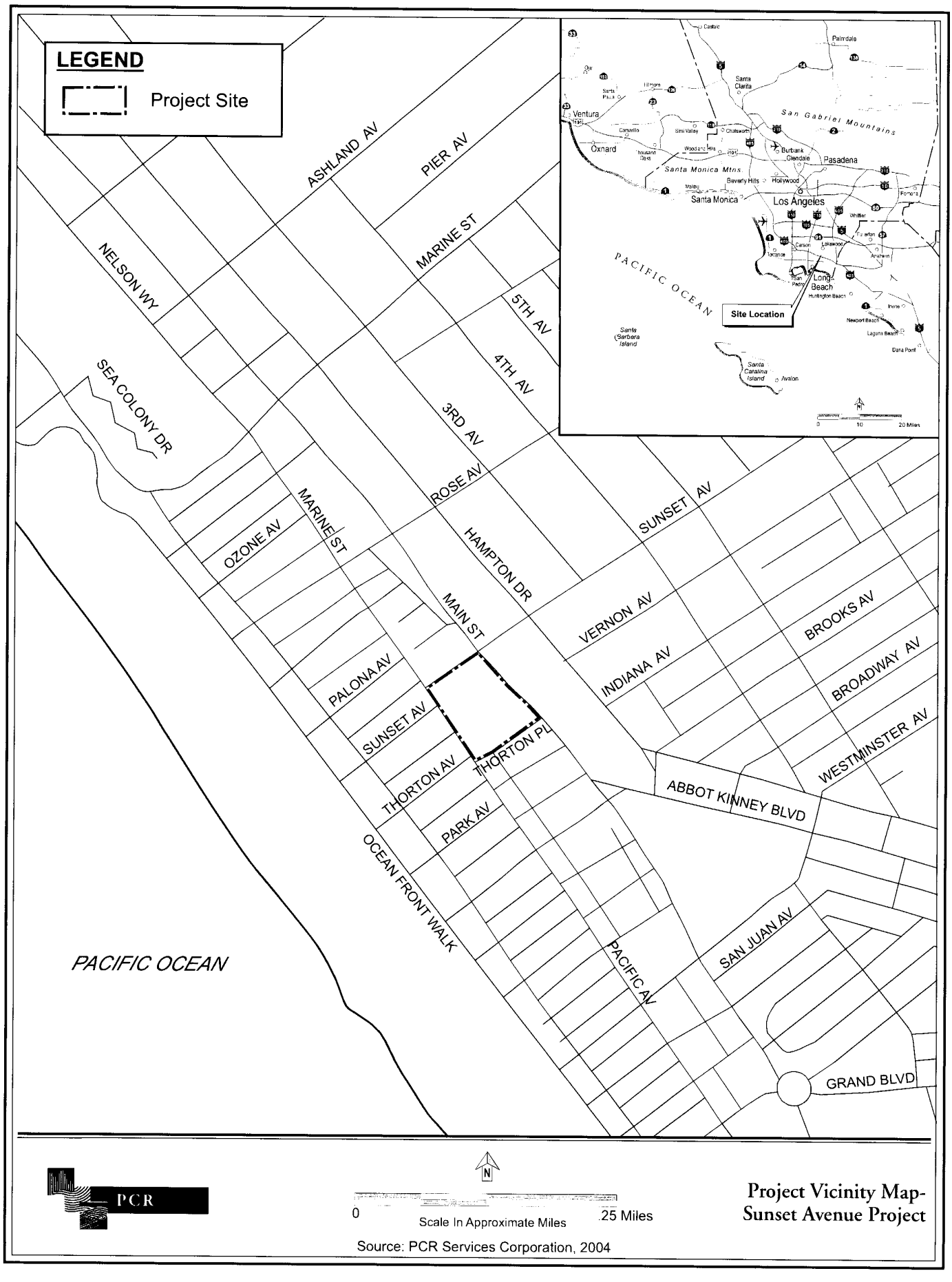
Enclosures

ATTACHMENT A: PROJECT DESCRIPTION – SUNSET AVENUE PROJECT

The project site is located at 100 East Sunset Avenue in the Venice Community of the City of Los Angeles. It occupies an entire city block and is bordered by Pacific Avenue to the west, Main Street to the east, Sunset Avenue to the north, and Thornton Place to the south. As indicated on Figure 1, the site is located approximately 0.3 mile south of the City of Los Angeles/City of Santa Monica boundary, 1.1 miles north of Los Angeles County's Marina del Rey small craft harbor, and 0.25 mile east of the Pacific Ocean. Following the completion of the Los Angeles County Metropolitan Transportation Authority's (MTA) new West Los Angeles Transportation Center, to be located on Jefferson Boulevard between Rodeo Road and National Boulevard, the existing Division 6 Bus Depot, which presently occupies the project site, would be permanently vacated by the MTA. The existing structures, consisting of approximately 15,300 square feet of floor area, would be removed and any contamination associated with the site's previous use remediated.

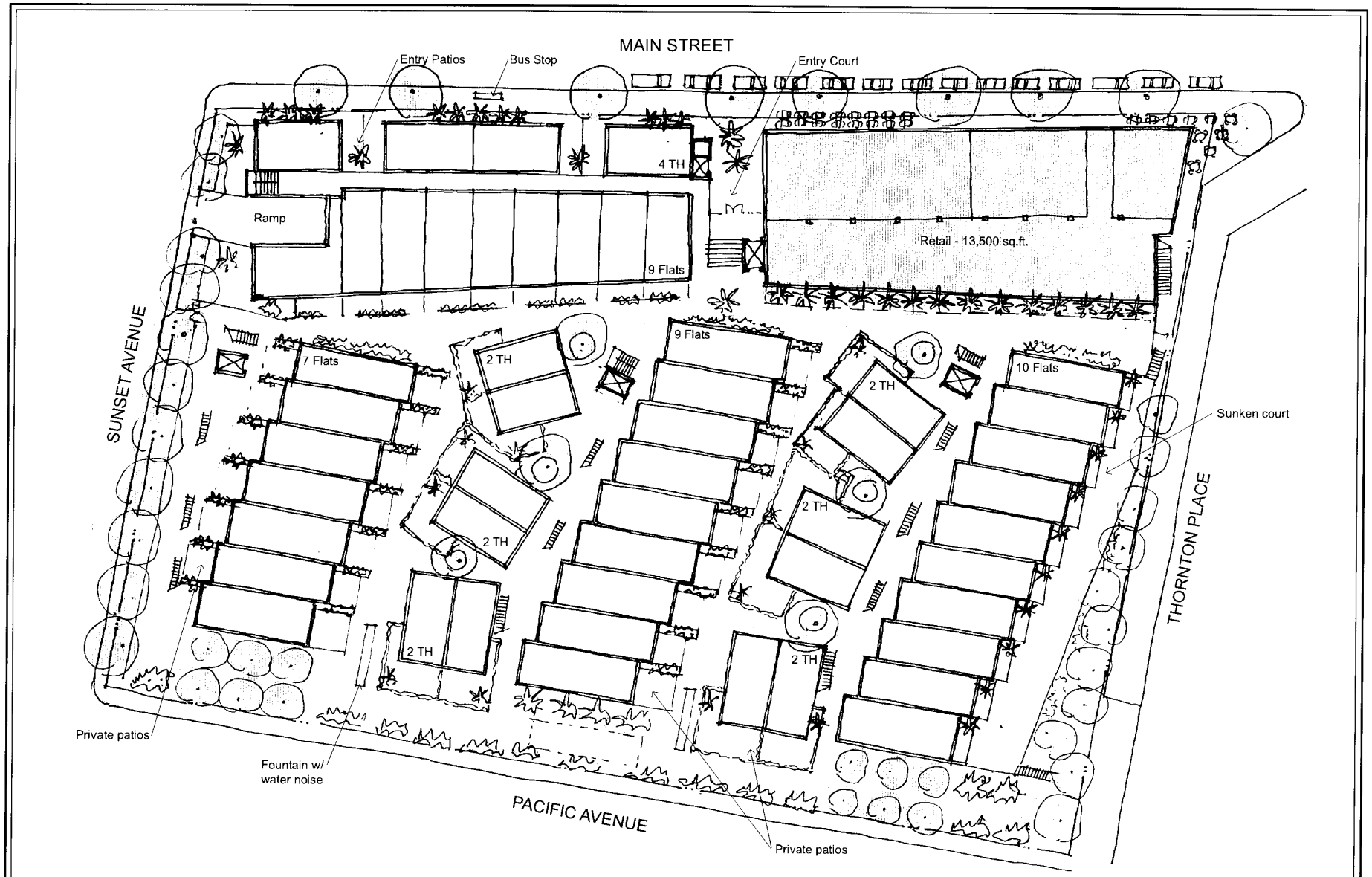
The Sunset Avenue Project would displace the existing bus depot and maintenance yard with a development that is largely residential but would also include some neighborhood retail space. Specifically, after a Major Transportation Corridor Density Bonus, a total of 225 residential condominiums are proposed (167 market rate dwellings and 58 affordable dwellings) in a product mix including one- and two-bedroom units. In addition, approximately 13,500 square feet of retail space is proposed in a ground floor setting to be occupied by café and restaurant uses, though up to 7,000 square feet may house a health club.

As depicted in a conceptual site plan presented in Figure 2, several buildings are contemplated with a combination of community courtyards and private spaces in between. The residential structures along the Main Street and Pacific Avenue frontages are proposed with building heights of 35 feet, with varied roofline, above those streets, respectively, while the more central structures are proposed to be approximately 45 to 50 feet in height. Each of the residential structures would be constructed over two levels of subterranean parking with capacity for 650 to 750 vehicles. Parking capacity will comply with Los Angeles Municipal Code requirements for residential and retail uses. Residential vehicular ingress and egress is proposed via Sunset Avenue and Thornton Place and by a restricted right turn in/right turn out driveway, for residents and retail patrons, on Main Street. Roadway dedications along both Sunset Avenue and Thornton Place are proposed. The architectural character of the proposed improvements is still under development.



Project Vicinity Map-
Sunset Avenue Project

Source: PCR Services Corporation, 2004

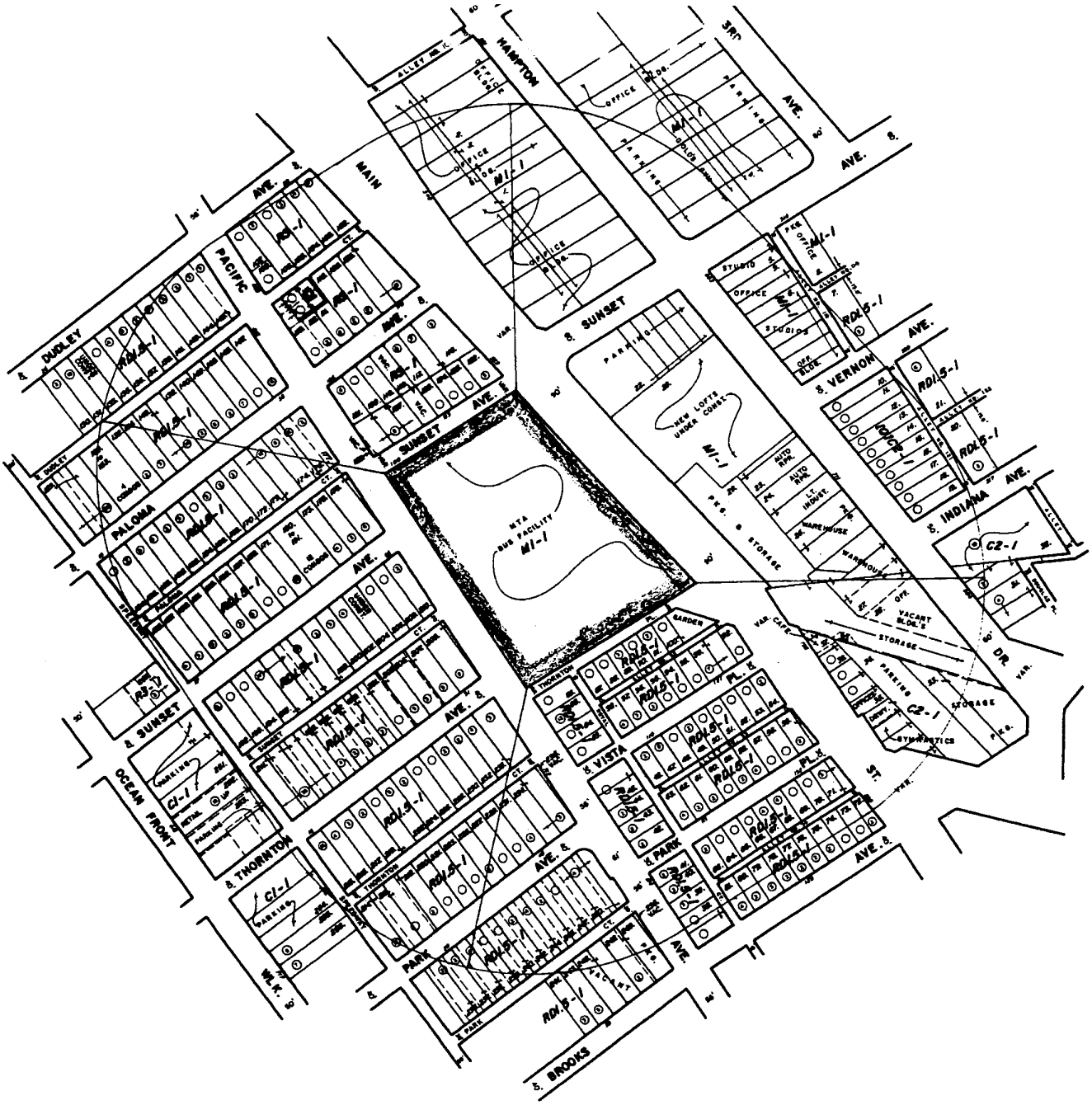


PCR

1" = 60' Feet
Scale In Approximate Feet

Source: Koning Eizenberg Architecture, 2004

Sunset Avenue Project
Conceptual Site Plan



PCR

0 500 Feet

Scale In Approximate Feet

GC Mapping Service, 2004

Sunset Avenue Project
500 Foot Radius Map

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF PREPARATION

TO:	RESPONSIBLE OR TRUSTEE AGENCY State Clearinghouse	**FROM:**	LEAD CITY AGENCY Los Angeles Department of City Planning
	ADDRESS Office of Planning & Research Attn: Glen Stober 1400 Tenth Street, Room 121 Sacramento, CA 95814		ADDRESS Environmental Review Section 200 North Spring Street, Room 763 Los Angeles, CA 90012

SUBJECT: Notice of Preparation of Draft Environmental Impact Report

PROJECT TITLE	CASE NO.
Sunset Avenue Project (Venice)	ENV-2004-1407-EIR

PROJECT APPLICANT, IF ANY

RAD Jefferson LLC

The City of Los Angeles will be the Lead Agency and will prepare an environmental impact report for the project identified above. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by this City when considering your permit or other approval for the project.

The project description, location and the probable environmental effects are contained in the attached materials.

❑ A copy of the Initial Study **is** attached.

■ A copy of the Initial Study **is not** attached.

Due to the time limits mandated by state law, your response must be sent at the earliest possible date, but not later than **30** days after receipt of this notice.

Please send your response to Jimmy C. Liao at the address of the Lead City Agency as shown above. We will need the name of a contact person in your agency.

Note: If the Responsible or Trustee Agency is a state agency, a copy of this form must be sent to the State Clearinghouse in the Office of Planning and Research, 1400 Tenth Street, Room 121, Sacramento, CA 95814. A state identification number will be issued by the Clearinghouse and should be thereafter referenced on all correspondence regarding the project, specifically on the title page of the draft and final EIR and on the Notice of Determination.

SIGNATURE	TITLE	TELEPHONE NUMBER	DATE
Jimmy C. Liao	City Planner	(213)978-1331	3/24/04

Notice of Completion & Environmental Document Transmittal

SCH #

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

Project Title: Sunset Avenue Project (Venice)
Lead Agency: Los Angeles Department of City Planning
Street Address: 200 North Spring Street, Room 763
City: Los Angeles

Contact Person: Jimmy C. Liao
Phone: (213)978-1331
County: Los Angeles

Project Location: 100 Sunset Avenue, Venice.
County: Los Angeles
Cross Streets: Rose Ave. And Main Street
Assessor's Parcel No. Section:
Within 2 Miles: State Hwy # Waterways:
Airports: Railways:

City/Nearest Community: Venice
Zip Code: 90291 Total Acres: 3.13
Twp: Range: - Base:
Schools: Westminister Elementary School

Document Type:

CEQA: ■ NOP ☐ Supplement/Subsequent EIR (Prior SCH No.) NEPA: ☐ NOI Other: ☐ Joint Document
☐ Early Cons ☐ Other ☐ EA ☐ Final Document
☐ Neg Dec ☐ Draft EIS ☐ Other
☐ Draft EIR ☐ FONSI

Local Action Type:

☐ General Plan Update ■ Specific Plan Exception ■ Rezone ☐ Annexation
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ■ Coastal Permit
☐ Community Plan ☐ Site Plan ■ Land Division (Subdivision, etc.) ☐ Other Design Review

Development Type:

■ Residential:	Units 225	Acres		☐ Water Facilities:	Type	MGD
☐ Office:	Sq. ft.	Acres	Employees	☐ Transportation:	Type	
■ Commercial:	Sq. ft.: 13,500	Acres	Employees	☐ Mining:	Mineral	
☐ Industrial:	Sq. ft.	Acres	Employees	☐ Power:	Type	Watts
☐ Educational				☐ Waste Treatment:	Type	
☐ Recreational				☐ Hazardous Waste:	Type	
				☐ Other:		

Funding (approx.): Federal $ State $ Total $

Project Issues Discussed in Document:

■ Aesthetic/Visual	☐ Flood Plain/Flooding	■ Schools/Universities	■ Water Quality
☐ Agricultural Land	☐ Forest Land/Fire Hazard	☐ Septic Systems	☐ Water Supply/Groundwater
■ Air Quality	■ Geologic/Seismic	■ Sewer Capacity	☐ Wetland/Riparian
☐ Archaeological/Historical	☐ Minerals	■ Soil Erosion/Compaction/Grading	☐ Wildlife
☐ Coastal Zone	■ Noise	■ Solid Waste	☐ Growth Inducing
☐ Drainage/Absorption	☐ Population/Housing Balance	■ Toxic/Hazardous	■ Land Use
☐ Economics/Jobs	■ Public Services/Facilities	■ Traffic/Circulation	■ Cumulative Effects
☐ Fiscal	■ Recreation/Parks	☐ Vegetation	☐ Other

Present Land Use/Zoning/General Plan Designation:

Bus Depot / M1 / Limited Manufacturing

Project Description:The project proposes a Tentative Tract Map (condominium), a Zone Change from M1 to CM, a Specific Plan Exception for height, a Coastal Development Permit, a Specific Plan Project Permit, and any other discretionary actions as may be determined necessary to redevelop the site into a largely residential development with some retail uses. Following the completion of the Los Angeles County Metropolitan Transportation Authority's (MTA) new West Los Angeles Transportation Center, to be located on Jefferson Boulevard between Rodeo Road and National Boulevard, the existing Division 6 Bus Depot on the project site, would be permanently vacated by the MTA. The existing structures would be removed and any contamination associated with the site's previous use remediated. A total of 225 residential condominiums are proposed (167 market rate dwellings and 58 affordable dwellings) in a product mix of one- and two- bedroom units. In addition, approximately 13,500 square feet of retail space is proposed in a ground floor setting to be occupied by café and restaurant uses, though up to 7,000 square feet may house a health club. Two levels of subterranean parking for 650 to 750 vehicles are included in the project.

Reviewing Agencies Checklist

_____ **Resources Agency**
_____ Boating & Waterways
_____ Coastal Commission
_____ Coastal Conservancy
_____ Colorado River Board
_____ Conservation
_____ Fish & Game
_____ Forestry & Fire Protection
_____ Office of Historic Preservation
_____ Parks & Recreation
_____ Reclamation Board
_____ S.F. Bay Conservation & Development Commission
_____ Water Resources (DWR)

Business, Transportation & Housing

_____ Aeronautics
_____ California Highway Patrol
__✓__ CALTRANS District # __7__
_____ Department of Transportation Planning (headquarters)
_____ Housing & Community Development
_____ **Food & Agriculture**

Health & Welfare

_____ Health Services _____

State & Consumer Services

_____ General Services
_____ OLA (Schools)

KEY

S = Document sent by lead agency

X = Document sent by SCH

✓ = Suggested distribution

Environmental Protection Agency

_____ Air Resources Board
_____ California Waste Management Board
_____ SWRCB: Clean Water Grants
_____ SWRCB: Delta Unit
_____ SWRCB: Water Quality
_____ SWRCB: Water Rights
_____ Regional WQCB # _____ (_____)

Youth & Adult Corrections

_____ Corrections

Independent Commission & Offices

_____ Energy Commission
_____ Native American Heritage Commission
_____ Public Utilities Commission
_____ Santa Monica Mountains Conservancy
_____ State Lands Commission
_____ Tahoe Regional Planning Agency

_____ Other _____

Public Review Period (to be filled in by lead agency)

Starting Date: March 24, 2004

Ending Date: April 23, 2004

Signature Jennifer C Liao Date: 3/24/04

Lead Agency (Complete if applicable):
Consulting Firm: PCR Services Crop..
Address:233 Wilshire Blvd., #130
City/State/Zip: Santa Monica, CA 90401
Contact:Gregory J. Broughton
Phone: (310) 451-4488

Applicant:: RAD Jefferson LLC
Address: 615 Hampton Drive, Suite A 108
City/State/Zip: Venice, CA 90291
Phone: (310) 399-4474

For SCH Use Only:
Date Received at SCH
Date Review Starts
Date to Agencies
Date to SCH
Clearance Date

Notes:

SOUTHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

RECEIVED
CITY OF LOS ANGELES
APR 21 2004
ENVIRONMENTAL
UNIT

April 15, 2004

Mr. Jimmy Liao
Project Coordinator
200 N. Spring Street, Room 763
Los Angeles, CA 90012

RE: SCAG Clearinghouse No. I 20040184 Sunset Avenue Project (Venice)

Dear Mr. Liao:

Thank you for submitting the **Sunset Avenue Project (Venice)** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Sunset Avenue Project (Venice)**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). The proposed project is not a residential development of more than 500 dwelling units, or a proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. Therefore, the proposed Project does not warrant comments at this time. It is not necessary to send/provide us a copy of the Draft EIR or Final EIR for this Project. However, please provide us with a Notice of Availability for the Draft EIR and for the Final EIR. Please be sure that the Notice includes a complete project description and comment due date. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **March 16-31, 2004** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

Jeffrey M. Smith

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Jan Boel
Acting Deputy Director

Notice of Preparation

March 25, 2004

To: Reviewing Agencies

Re: Sunset Avenue Project (Venice)
SCH# 2004031139

Attached for your review and comment is the Notice of Preparation (NOP) for the Sunset Avenue Project (Venice) draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jimmy Liao
Los Angeles City Planning Department
200 North Spring Street, Room 763
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Associate Planner, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2004031139
Project Title Sunset Avenue Project (Venice)
Lead Agency Los Angeles City Planning Department

Type NOP Notice of Preparation

Description The project proposes a Tentative Tract Map (condominium), a Zone Change from M1 to CM, a Specific Plan Exception for height, a Coastal Development Permit, and a Specific Plan Project Permit. Existing structures would be removed and any contamination associated with the site's previous use remediated. A total of 25 residential condominiums are proposed. In addition, approximately 13,500 square feet of retail space is proposed. Two levels of subterranean parking for 650 to 750 vehicles are included in the project.

Lead Agency Contact

Name Jimmy Liao
Agency Los Angeles City Planning Department
Phone 213.978.1331 **Fax**
email
Address 200 North Spring Street, Room 763
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City
Region
Cross Streets Rose Ave. and Main Street
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways
Schools Westminister Elementary School
Land Use Bus Depot / M1 / Limited Manufacturing

Project Issues Aesthetic/Visual; Air Quality; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Schools/Universities; Cumulative Effects; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Landuse

Reviewing Agencies Resources Agency; California Coastal Commission, Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Native American Heritage Commission; Department of Fish and Game, Region 5; California Highway Patrol; Department of Housing and Community Development; Caltrans, District 7; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Date Received 03/25/2004 **Start of Review** 03/25/2004 **End of Review** 04/23/2004

Note: Blanks in data fields result from insufficient information provided by lead agency

NOP Distribution List

County: Los Angeles SCH# [illegible]

Resources Agency

- ■ **Resources Agency** Nadell Gayou
- ☐ **Dept. of Boating & Waterways** Suzi Betzler
- ■ **California Coastal Commission** Elizabeth A. Fuchs
- ☐ **Colorado River Board** Gerald R. Zimmerman
- ■ **Dept. of Conservation** Roseanne Taylor
- ☐ **California Energy Commission** Environmental Office
- ☐ **Dept. of Forestry & Fire Protection** Allen Robertson
- ☐ **Office of Historic Preservation** Hans Kreutzberg
- ■ **Dept of Parks & Recreation** B. Noah Tilghman, Environmental Stewardship Section
- ☐ **Reclamation Board** Lori Buford
- ☐ **Santa Monica Mountains Conservancy** Paul Edelman
- ☐ **S.F. Bay Conservation & Dev't. Comm.** Steve McAdam
- ■ **Dept. of Water Resources** Resources Agency, Nadell Gayou

Fish and Game

- ☐ **Dept. of Fish & Game** Scott Flint, Environmental Services Division
- ☐ **Dept. of Fish & Game 1** Donald Koch, Region 1
- ☐ **Dept. of Fish & Game 2** Banky Curtis, Region 2
- ☐ **Dept. of Fish & Game 3** Robert Floerke, Region 3
- ☐ **Dept. of Fish & Game 4** William Laudermilk, Region 4
- ■ **Dept. of Fish & Game 5** Don Chadwick, Region 5, Habitat Conservation Program
- ☐ **Dept. of Fish & Game 6** Gabrina Gatchel, Region 6, Habitat Conservation Program
- ☐ **Dept. of Fish & Game 6 I/M** Tammy Allen, Region 6, Inyo/Mono, Habitat Conservation Program
- ☐ **Dept. of Fish & Game M** George Isaac, Marine Region

Other Departments

- ☐ **Food & Agriculture** Steve Shaffer, Dept. of Food and Agriculture
- ☐ **Dept. of General Services** Robert Sleppy, Environmental Services Section
- ☐ **Dept. of Health Services** Wayne Hubbard, Dept. of Health/Drinking Water

Independent Commissions,Boards

- ☐ **Delta Protection Commission** Debby Eddy
- ☐ **Office of Emergency Services** John Rowden, Manager
- ☐ **Governor's Office of Planning & Research** State Clearinghouse
- ______________
- ■ **Native American Heritage Comm.** Debbie Treadway
- ☐ **Public Utilities Commission** Ken Lewis
- ☐ **State Lands Commission** Jean Sarino
- ☐ **Tahoe Regional Planning Agency (TRPA)** Cherry Jacques

Business, Trans & Housing

- ☐ **Caltrans - Division of Aeronautics** Sandy Hesnard
- ☐ **Caltrans - Planning** Ron Helgeson
- ■ **California Highway Patrol** John Olejnik, Office of Special Projects
- ■ **Housing & Community Development** Cathy Creswell, Housing Policy Division

Dept. of Transportation

- ☐ **Dept. of Transportation 1** Mike Eagan, District 1
- ☐ **Dept. of Transportation 2** Don Anderson, District 2
- ☐ **Dept. of Transportation 3** Jeff Pulverman, District 3
- ☐ **Dept. of Transportation 4** Tim Sable, District 4
- ☐ **Dept. of Transportation 5** David Murray, District 5
- ☐ **Dept. of Transportation 6** Marc Birnbaum, District 6
- ■ **Dept. of Transportation 7** Stephen J. Buswell, District 7
- ☐ **Dept. of Transportation 8** Linda Grimes, District 8
- ☐ **Dept. of Transportation 9** Gayle Rosander, District 9
- ☐ **Dept. of Transportation 10** Tom Dumas, District 10
- ☐ **Dept. of Transportation 11** Bill Figge, District 11
- ☐ **Dept. of Transportation 12** Bob Joseph, District 12

Cal EPA

Air Resources Board

- ☐ Airport Projects Jim Lerner
- ☐ Transportation Projects Kurt Karperos
- ☐ Industrial Projects Mike Tollstrup
- ☐ **California Integrated Waste Management Board** Sue O'Leary
- ☐ **State Water Resources Control Board** Jim Hockenberry, Division of Financial Assistance
- ☐ **State Water Resources Control Board** Student Intern, 401 Water Quality Certification Unit, Division of Water Quality
- ☐ **State Water Resouces Control Board** Steven Herrera, Division of Water Rights
- ■ **Dept. of Toxic Substances Control** CEQA Tracking Center

Regional Water Quality Control Board (RWQCB)

- ☐ **RWQCB 1** Cathleen Hudson, North Coast Region (1)
- ☐ **RWQCB 2** Environmental Document Coordinator, San Francisco Bay Region (2)
- ☐ **RWQCB 3** Central Coast Region (3)
- ■ **RWQCB 4** Jonathan Bishop, Los Angeles Region (4)
- ☐ **RWQCB 5S** Central Valley Region (5)
  - ☐ **RWQCB 5F** Central Valley Region (5), Fresno Branch Office
  - ☐ **RWQCB 5R** Central Valley Region (5), Redding Branch Office
- ☐ **RWQCB 6** Lahontan Region (6)
  - ☐ **RWQCB 6V** Lahontan Region (6), Victorville Branch Office
- ☐ **RWQCB 7** Colorado River Basin Region (7)
- ☐ **RWQCB 8** Santa Ana Region (8)
- ☐ **RWQCB 9** San Diego Region (9)
- ☐ Other ______________

Last Updated on 01/12/04

South Coast
Air Quality Management District
21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 · www.aqmd.gov

March 26, 2004

Mr. Jimmy Liao, Project Coordinator
City of Los Angeles
200 North Spring Street, Room 763
Los Angeles, CA 90012

Dear Mr. Liao:

Notice of Preparation of a Draft Environmental Impact Report for
Sunset Avenue Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR).

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the CARB Website at: www.arb.ca.gov.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis. An analysis of all toxic air contaminant impacts due to the

decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (http://www.aqmd.gov).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,

Steve Smith,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development and Area Sources

SS:CB:li

LAC040325-02LI
Control Number

STATE OF CALIFORNIA - THE RESOURCES AGENCY ARNOLD SCHWARZENEGGER, *Governor*

CALIFORNIA COASTAL COMMISSION
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071

April 30, 2004

Jimmy Liao
City of Los Angeles Planning Department
200 North Spring Street, #763
Los Angeles, CA 90012

Re: Notice of Preparation for the Sunset Avenue Project (Venice) Draft EIR (SCH#2004031139).

Dear Mr. Liao:

The Commission staff has reviewed the above-referenced document and appreciates the opportunity to submit the following comments.

The proposed project involves the demolition of existing development, remediation, and construction of 225 residential units (including 58 affordable units), 13,500 sq. ft. of commercial area, and 650-750 parking spaces on an industrial site currently occupied by the Los Angeles County Metropolitan Transportation Authority (MTA) bus maintenance yard.

The project site is located entirely within the Venice coastal zone. Section 30600(a) of the Coastal Act requires that, in addition to obtaining any other permit required by law from any local government or from any state, regional, or local agency, any person, as defined in Section 21066, wishing to perform or undertake any development in the coastal zone shall obtain a coastal development permit. Therefore, the applicant for the proposed development must obtain a valid coastal development permit prior to proceeding with the proposed development.

Pursuant to Section 30600(b) of the Coastal Act, the City of Los Angeles has accepted responsibility for processing coastal development permits in Venice, with the caveat that any coastal development permit action taken by the City is appealable to the Coastal Commission. Since the proposed project is located in an area that presently does not have a certified Local Coastal Program (LCP), the standard of review for the coastal development permit is the Chapter 3 policies of the Coastal Act. Therefore, the draft EIR should address the proposed project's consistency with the Chapter 3 policies of the Coastal Act. The coastal development permit review process will ensure that the proposed project is undertaken in a manner consistent with the Chapter 3 policies of the California Coastal Act.

The Chapter 3 issues raised by the proposed project include: the density and scale of the proposed project and its potential effects on community character and visual resources, the quantity and quality of visitor-serving elements provided by the development, and public access (including the provision of adequate on-site parking supplies). Although the Coastal Act does not require developments to provide new affordable housing, the Commission does not discourage the development of affordable housing opportunities in a manner that is consistent with the Chapter 3 policies of the Coastal Act.

As stated in Sections 30222 and 30223 of the Coastal Act, residential projects are not a priority land use in the coastal zone, as visitor-serving commercial recreational facilities are preferred. Therefore, public access and recreational opportunities should be emphasized within the proposed project.

Section 30222 of the Coastal Act states:

> The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over

private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

Section 30223 of the Coastal Act states:

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

Sections 30251 and 30253 are also relevant in regards to the scale of development and the protection of Venice's unique community character and visual resources.

Section 30251 of the Coastal Act states:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Section 30253 of the Coastal Act states:

New development shall:

(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.
(3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development
(4) Minimize energy consumption and vehicle miles traveled.
(5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

Although the Venice area does not have a certified LCP, the Commission has certified the City of Los Angeles Land Use Plan (LUP) for Venice, which provides guidance for the interpretation of the Chapter 3 policies. In regards to the project site (MTA bus maintenance yard), the certified Venice LUP provides the following guidance:

- LUP Exhibit 10a (Land Use Map) designates the project site as a "Limited Industry" land use.

- LUP Exhibit 17a (Coastal Access Map) identifies the project site as a "Potential New or Expanded Surface Parking Site" and as a "Potential Public Parking Structure Site."

- LUP Policy I.C.7 States:

Policy I. C. 7. Bus Yard Redevelopment. *Should the site become available, priority uses for the future redevelopment of the former MTA (formerly Southern California Rapid Transit*

District (RTD)) bus service maintenance and storage facility, located on Main Street, between Sunset Avenue and Thornton Place, include affordable housing, which may be a mixed-use residential-commercial project, and public parking structure as a measure to improve public access.

- LUP Policy II.A.2 States:

Policy II. A. 2. Expansion of Public Beach Parking Supply. *The construction of new public parking facilities should be implemented, as well as maximizing the use of existing ones by restriping existing parking lots or converting them to multi-level structures where consistent with other Coastal Act policies. The parking lots located west of the Ocean Front Walk shall remain surface parking lots. In no case shall such structures obstruct ocean views or be inconsistent with other Coastal Act or LUP Policies.*

Implementation Strategies

The site of the Los Angeles County Metropolitan Authority (MTA) bus maintenance yard located between Main Street and Pacific Avenue south of Sunset Avenue is a potential site for public parking. It is estimated that about 350 spaces could be provided on the approximately 3-acre site. This site affords good walking access to the beach, and good vehicular access via Main Street and Pacific Avenue.

The certified Venice LUP includes several additional policies and implementation strategies that are applicable to the design and location of the proposed development. We strongly recommend that the draft EIR address the proposed project's consistency with policies set forth by the certified Venice LUP, and that the draft EIR also analyze different alternatives to the proposed project. We hope that these comments are useful, and respectfully reserve the opportunity to comment more specifically after the draft EIR is published. Please call me if you have any questions.

Sincerely,

Charles R. Posner
Coastal Program Analyst

Cc: State Clearinghouse
Councilwoman Cindy Miscikowski

Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Terry Tamminen
Agency Secretary
Cal/EPA

Arnold Schwarzenegger
Governor

April 15, 2004

Mr. Jimmy Liao
Los Angeles City Planning Department
200 North Spring Street, Room 763
Los Angeles, California 90012

NOTICE OF PREPARATION FOR THE SUNSET AVENUE PROJECT (VENICE) DRAFT ENVIRONMENTAL IMPACT REPORT, SCH NO. 2004031139

Dear Mr. Liao:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of a draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

1. The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.

2. The draft EIR needs to identify any known or potentially contaminated site within the Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.

3. The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

4. If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exists, the draft EIR

should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Sincerely,

Harlan R. Jeche

Harlan R. Jeche
Unit Chief
Southern California Cleanup Operations Branch – Glendale Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812 3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF PUBLIC TRANSPORTATION
AND REGIONAL PLANNING
IGR/CEQA BRANCH
120 SOUTH SPRING STREET
LOS ANGELES, CA 90012
PHONE (213) 897-3747
FAX (213) 897-1337

Flex your power!
Be energy efficient!

May 4, 2004

Mr. Jimmy Liao
City of Los Angeles, Planning Department
200 North Spring Street, Suite 763
Los Angeles, CA 90012

Re: ***Sunset Avenue Project (NOP of Draft EIR)***
IGR/CEQA 040353/EA, SCH#2004031139
~~Vic. LA /-001-/PM 33.00~~

Dear Mr. Liao

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Sunset Avenue project. The project would include construction of 225 residential condominiums and approximately 13,000 square feet of retail space. In the spirit of mutual cooperation through build-out of the project, we offer the following comments:

- To help us evaluate project –related traffic impacts on Lincoln Boulevard (State Route 1), we request that a traffic study be prepared. The traffic study should include a peak-hour analysis of the intersections at [redacted].

  Generally we request that traffic studies include the following information:
  1. Existing traffic volume counts during AM and PM peak periods.
  2. Level of Service before and after development
  3. Future conditions should include both project, and project plus cumulative traffic.
  4. Discussion of mitigation measures appropriate to alleviate any anticipated traffic impacts, including sharing of mitigation costs.

  For additional information, please refer to our Guide for the preparation of Traffic Impact Studies at: http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf

- We note the project would need a zone change and a specific plan exception. Has the City consider other development alternatives for this site? How does this project help achieving the goals established in the City's General Plan?

- Please include an update of the relinquishment process of Lincoln Boulevard?

If you have any questions, you may reach me at (213) 897-3747 and refer to IGR/CEQA record number 040353/EA.

Sincerely,

CHERYL J. POWELL
IGR/CEQA Program Manager
Caltrans, District 7

LOS ANGELES POLICE DEPARTMENT

WILLIAM J. BRATTON
Chief of Police

JAMES K. HAHN
Mayor

P.O. Box 30158
Los Angeles, Calif. 90030
Telephone: (213) 485-4101
TDD: (877) 275-5273
Ref #: 1.1.2

April 14, 2004

Mr. Jimmy Liao
Project Coordinator
200 North Spring Street, Room 763
Los Angeles, California 90012

Dear Mr. Liao:

PROJECT TITLE: SUNSET AVENUE PROJECT (VENICE)

The proposed project involves the Los Angeles Police Department's (LAPD) Pacific Area. Enclosed is the Area crime rate, predominant crimes, response time to emergency calls for service, and Area personnel statistics and information. The Department's response is based on information received from the Area in which the project is located, LAPD's Information Technology Division and input from LAPD's Community Relations Section, Crime Prevention Unit (CPU) personnel.

A project of this size would have a less than significant impact on police services in Pacific Area. The CPU is available to advise you on crime prevention features appropriate to the design of the property involved in the project. The LAPD strongly recommends that developers contact CPU personnel to discuss these features.

Upon completion of the project, you are encouraged to provide Pacific Area commanding officer with a diagram of each portion of the property. The diagram should include access routes and any additional information that might facilitate police response.

Questions regarding this response should be referred to Sergeant Ralph Morales, Community Relations Section, at (213) 485-4101.

Very truly yours,

WILLIAM J. BRATTON
Chief of Police

FRED BOURER, Lieutenant
Officer in Charge
Community Relations Section
Office of the Chief of Police

Enclosure

PACIFIC AREA

The Sunset Avenue (Venice) project is located in Pacific Area, in Reporting District (RD) 1412. Pacific Area covers 25.62 square miles and the station is located at 12312 Culver Boulevard, Los Angles, California 90066, (310) 202-4502.

The service boundaries of Pacific Area are as follows: the Los Angeles City boundary, Santa Monica Freeway (10) and National Boulevard to the north, the Los Angeles City boundary to the south, Vista Del Mar and Oceanfront Walk to the west, and the Los Angeles City boundary and the Santa Monica Freeway (10) to the east.

The boundaries for RD 1412 are as follows: the Los Angeles City boundary to the north, Oceanfront Walk to the west, Westminster Avenue to the south, and Hampton Drive to the east.

The average response time to emergency calls for service in Pacific Area during 2002 was 9.3 minutes. The Citywide average during 2002 was 10.2 minutes. There are approximately 366 sworn officers and 25 civilian support staff deployed over three watches at Pacific Area.

There were 48 crimes per 1000 persons in Pacific Area during 2002. Population and crimes are listed on the attached RD information sheets. The predominant crimes in Pacific Area are vehicle theft, other types of theft and burglary from vehicle.

Prepared by:
Community Relations Section
Crime Prevention Unit

LOS ANGELES POLICE DEPARTMENT
CRIMES BY REPORTING DISTRICT OF OCCURRENCE

PROJECT NAME: SUNSET AVENUE (VENICE)

TYPE OF CRIME	RD * 1412	PACIFIC AREA	CITYWIDE
Burglary from Business	2	218	5,407
Burglary from Residence	23	946	15,155
Burglary Other	4	236	4,758
Street Robbery	5	328	11,259
Other Robbery	5	256	5,998
Murder	1	18	655
Rape	0	50	1,400
Aggravated Assault	21	796	32,491
Burglary from Vehicle	43	1,882	29,135
Theft from Vehicle	9	645	13,467
Grand Theft	28	1,407	12,408
Theft from Person	0	60	1,006
Purse Snatch	0	8	348
Other Theft	25	1,536	22,890
Bicycle Theft	2	22	306
Vehicle Theft	25	1,879	34,123
Bunco	0	4	133
TOTAL	193	10,291	190,939

CRIMES PER 1000 PERSONS

REPORTING DISTRICT	CRIMES	/	POPULATION X 1000	CRIMES PER 1000 PERSONS
PACIFIC	10,291	/	212,576	48/1000
CITYWIDE	190,939	/	3,865,000	49/1000

* All statistical information is based on 2002 Los Angeles Police Department Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 report.

Jimmy Liao, Project Coord.
200 North Spring Street
Los Angeles, CA 90012
City of Los Angeles
Dept. of City planning

March 26th-2004

REGARDING: EAF NO: ENV-2004-1407
SUNSET AVENUE PROJECT, VENICE

(1) What will become of the long masonry wall dedicated to MIA's if this project is approved?
(2) I was under the impression that this parcel of land was owned by the MTA. This fact came to my attention after telephone converstations with the California Coastal Commision as well as with the Council Woman for the 11th district , Cindy Miscikowski. Did the City purchase this land from the MTA ?
(3) Were there public notices indicating that the MTA was interested in selling this property ?
(4) Where will the patrons of the retail facilities in this new developement park while they are shopping and eating ? Where will the guests of the tenants who are residing in this developement park ? Perhaps in the underground parking ?
(5) Exactly who are the people who are proposing this develeopement ? Are they "The City of L.A." or private individuals ?
(6) My wife and I along with a partner own property in this very area, and find it nearly impossible to find on street parking..... especially in summer. Will there be a "SERIOUS" attempt to solve this problem for those of us who are rersidents ? Or will the City just sweep the problem under the rug like they have for many, many years, and hope that the problem will either go away or solve itself. Perhaps I could rent a parking space in the proposed under-ground parking facilities. PLEASE RESPOND TO THE ABOVE INQUIRIES.

Jim Starrett - 117 Brooks Ave - Venice CA - 90291 - 310-396-2186

ALAN L. FREEDMAN

PARKHURST BUILDING
185 PIER AVENUE, SUITE 110, SANTA MONICA, CA 90405-5331
(310) 450-0326 FAX (310) 450-3318

March 26, 2004

Jimmy Liao, Project Coordinator
City of Los Angeles
200 North Spring Street, Room 763
Los Angeles, CA 90012

Re: MTA Bus Facility Redevelopment/Sunset Avenue Project EAF NO: ENV-2004-1407

Dear Mr. Liao:

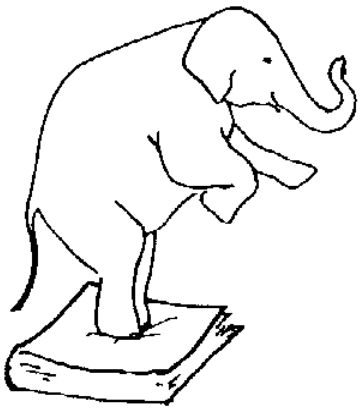
I received the Notice of Preparation and Notice of Public Scoping Meeting dated March 25, 2004. My initial comments are set forth below. It is too early to comment on the esthetics, though I believe many neighbors will have comments on this. I am concerned that the site contamination from the long use as a rail and bus terminal with underground tanks and auto and rail mechanical work be cleaned up so as not to contaminate adjoining properties during and after construction. I am also concerned about the noise and dust and other air pollution during construction. I am concerned about traffic and parking in an area of very very tight parking during construction and afterwards. I am concerned that the commercial/retail building at the southerly end on Main St. and next to Thornton does not provide a sufficient buffer zone between it and the residential uses to the south. There should probably be more side set back from Thornton Place and a wall of trees, sound wall or some other buffer to separate the commercial/retail from the residential use south of Thornton Place. I don't think Thornton should be used for ingress or egress by vehicles to the project. Also, it should not be used for delivery to the commercial/retail uses or for garbage or trash, and the deliveries to the property should be at times so as not to unreasonably disturb the neighbors.

As the owner of a building on Vista Place one property off Main Street that backs up on an alley near Thornton Place, I and I venture to say my tenants would not be happy with a project that causes excessive noise, dust, odors, toxic waste and dust and exacerbates the tight parking and traffic problems in the area or otherwise negatively affects the nearby residential users. I think traffic on Main Street in the area is uncontrolled, dangerous and travels at excessive speeds between Brooks and Rose. On the other hand, I would look forward to a well planned project that takes into consideration the above factors and meets the planning and development standards in the area.

Very truly yours,

Alan L. Freedman

Vistapl\BusTerminal\CityJimmieLiaoL001



Children's Library Press

RECEIVED
CITY OF LOS ANGELES
MAR 30 2004
ENVIRONMENTAL UNIT

Jimmy Liao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, CA 90012

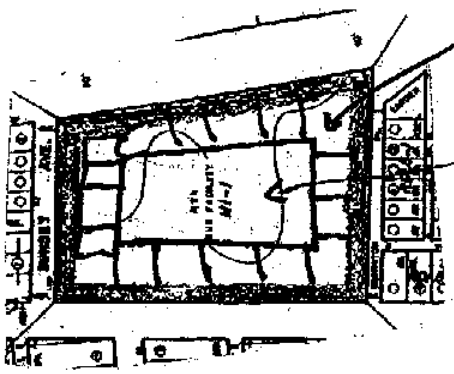
TO ↗

EAE NO: ENV-2004-1407
PROJECT NAME: Sunset Avenue Project (Venice)

re: ↗

Dear Mr. Liao,

It would give more greenspace and function to have this development around a central COURTYARD.



building area (red squares)

garden, pool, etc. ▭ green area

Don't you think? Best, Jerry Sohn

P.S. Their current proposal is awful.

P.S. If you want a suggestion for an architect - I'd be happy to [illegible]

Publisher: Jerry Sohn
P.O. Box 2489, Venice, California 90294 U.S.A.
Tel: (310) 392-1881 Fax: (310) 392-2182

From: <ELOCBOB@aol.com>
To: <JLIAO@planning.lacity.org>
Date: 3/26/04 11:38AM
Subject: Sunset Avenue Project (Venice) FAF NO. env-2004-1407

Dear Mr. Liao,

It would be helpful if the project incorporated 50-100 parking spaces for monthly pay parking. This would be a win-win as it would provide additional income for the developers and must needed parking in the immediate area.

Paloma Ave resident

Robert Cole

<smaller>EAF No: ENV-2004-1407

Project Name. Sunset Avenue Project (Venice)

Project Address: 100 East Sunset Avenue

Dear Mr. Liao,

Although I support having a mixed use space development at 100 East Sunset Avenue in Venice and I am glad that the bus depot will be relocating, I do not support the current development plans. I have very strong concerns about the impact the proposed project will have on the neighborhood and believe the plans need to be changed.

This development is being proposed on a block on land that is surrounded by walk streets and special care needs to be taken to respect the visual and neighborly atmosphere that has become the historical trademark of Venice Beach.

The proposed scale of the development is way too large for the bus depot area and for the president set in the surrounding community. I firmly believe that the developer needs to significantly reduce the number of rental units. At the proposed size, traffic in the area would be adversely impacted on a daily basis. During the summer and weekends, when traffic is already a problem, this deserves serious consideration.

I strongly oppose any waiver of the height limits for any part of the new development. The height limit in this neighborhood is 35 – the developer has requested 50 feet. This is absolutely unacceptable.

If cafes are to be included in the project, the garbage collection areas must be designed so that foul smells and refuse do not escape into the neighborhood. There needs to be a guarantee of this, as we have all seen local developers trample on the quality of life for the community in this regard. I would also like to see guidelines set up as to what type of cafes and restaurants can be permitted. Specifically, I would like to see a ban on fast food and certain types of packaging – like the papers that wrap hamburgers. Wrappers and such would be discarded on our walk streets.

I would like to see the Environmental Impact report and a Costal Commission report. The impact of this proposed development needs to be throughly evaluated. I fear that it also will destroy part of the historic charm that makes Venice such a wonderful place to live and to visit

Thank you for your time and attention. Unfortunately, I will not be

able to attend tonight's meeting. I want to attend any future meetings, so please continue to make sure the community is notified.

Sincerely,

Helen Hood Schoer

132 Park Place

Venice, CA 90291

TEL: 310-399-2433

E-MAIL: hh_schoer@earthlink.net</smaller>

Sherie Scheer

31 Park Avenue
Venice CA 90291

phone 310 396-0039
sherie.scheer@verizon.net

April 7, 2004

RE : EAF ENV-2004-1407
Sunset Avenue Project (Venice)
100 East Sunset Avenue

Meeting 6:30 – 8:30 at Westminster School Gym April 7, 2004

To Whom It May Concern:

Although I support having a mixed-use space development at 100 East Sunset and I am glad that the bus depot will be relocating, I vehemently oppose a waiver to the Environmental Impact Report.

Definitely the height should not exceed 35 feet anywhere in the project

At the proposed size, traffic in the area would be adversely, even chaotically, affected. The project needs to be scaled back in number of units.

If cafes are to be included in the project, the garbage collection areas must be designed so that foul smells and refuse do not escape into the neighborhood.

Sincerely yours,

Sherie Scheer

April 7, 2004
17 PARK Ave.
Venice, CA. 90291

EAF No: ENV-2004-1407
Project NAME: Sunset Ave. Project
Project ADDRESS: 100 EAST Sunset Ave.

DEAR Mr LIAO,

I believe the proposed project will impact the historical Venice Beach neighborhood in a negative way. The developers PLANS need to be scaled down in both number of units and height. We residents already suffer from too much traffic from there being No Municipal parking lots. We fear that the noise and garbage from cafes and restaurants would destroy the historic charm that makes Venice the place that we all love.

Yours truly
Barbara Dewar

<smaller>EAF No: ENV-2004-1407

Project Name: Sunset Avenue Project (Venice)

Project Address: 100 East Sunsot Avenue

Dear Mr. Liao,

I already wrote you one letter in regard to the project sited above. After doing a little more thinking and research, I have additional concerns about this development. Please let me know if this letter is reaching you in time to make sure my concerns are all addressed in the upcoming studies and reports. (My first letter is also pasted below -- thanks for replying to it already.)

I am VERY concerned about the following:

1) The material they plan to use will reflect a lot of heat, making this a hot zone! This needs to be studied and rectified.

2) The noise bounce off the building material needs to be studied in depth -- from what I understand about the proposal thus far, the consequences seem disastrous for this neighborhood.

3) A thorough study into the sewer lines needs to be performed -- can the existing sewers handle 225 new units with 1-2 bathrooms each? How will that affect the existing residences?

4) The allies around the proposed development need to be included in the environmental impact report and all other studies -- especially the alley that runs in between Pacific and Main St (parallel to these allies), Royal Court. Also, the first alley North of Brooks (it has no name). These are very narrow allies and can't handle a lot of traffic and they can not be made into one way alleys because of the angles cars need to be at to park -- each house's cars need to enter in different directions.

5) While I favor having some low income units, it seems that this development is making up for a lack of other developments meeting their quotas. Having over 25% of the proposed units be low income housing could very well lead to a dangerous environment.

6) All development along Main Street ground-level should be retail, not residential. Multi-use spaces create better communities.

Below, you will find my previous letter as well.

Thanks for your time and attention.

Sincerely,

Helen Hood Scheer

132 Park Place

Venice, CA 90291

TEL: 310-399-2433

E-MAIL: hh_scheer@earthlink.net

EAF No: ENV-2004-1407

Project Name: Sunset Avenue Project (Venice)

Project Address: 100 East Sunset Avenue

April 7, 2004

Dear Mr. Liao,

Although I support having a mixed-use space development at 100 East Sunset Avenue in Venice and I am glad that the bus depot will be relocating, I do not support the current development plans. I have very strong concerns about the impact the proposed project will have on the neighborhood and believe the plans need to be changed.

This development is being proposed on a block of land that is surrounded by walk streets and special care needs to be taken to respect the visual and neighborly atmosphere that is the trademark of Venice Beach.

The proposed scale of the development is way too large for the bus depot area and for the precedent set in the surrounding community. I firmly believe that the developer needs to significantly reduce the number of rental units. At the proposed size, traffic in the area

would be adversely impacted on a daily basis. During the summer and weekends, when traffic is already a problem, this deserves serious consideration.

I strongly oppose any waiver of the height limits for any part of the new development. The height limit in this neighborhood is 35 -- the developer has requested 50 feet. This is absolutely unacceptable.

If cafes are to be included in the project, the garbage collection areas must be designed so that foul smells and refuse do not escape into the neighborhood. There needs to be a guarantee of this, as we have all seen local developers trample on the quality of life for the community in this regard. I would also like to see guidelines set up as to what type of cafes and restaurants can be permitted. Specifically, I would like to see a ban on fast food and certain types of packaging -- like the papers that wrap hamburgers. Wrappers and such would be discarded on our walk streets.

I would like to see the Environmental Impact report and a Costal Commission report. The impact of this proposed development must be thoroughly evaluated. I fear that this development will destroy part of the historic charm that makes Venice such a wonderful place to live and to visit.

Thank you for your time and attention. Unfortunately, I will not be able to attend tonight's meeting. I want to attend any future meetings, so please continue to make sure the community is notified.

Sincerely,

Helen Hood Scheer

<fontfamily><param>Helvetica</param><smaller>

</smaller></fontfamily></smaller>

From: Jimmy Liao
To: lizakeith@comcast.net
Subject: Re: EAF No: ENV-2004-1407

>>> lizak@meteorstudios.com 4/14/04 8:52:24 AM >>>

Re: EAF No: ENV-2004-1407
Project Name: Sunset Avenue Project (Venice)
Project Address: 100 East Sunset Avenue

Jimmy Liao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, CA 90012

Dear Mr. Liao,

Although I support having a mixed-use space development at 100 East Sunset Avenue in Venice and I am glad that the bus depot will be relocating,
I do not support the current development plans. I have very strong concerns about the impact the proposed project will have on the neighborhood
and sincerely believe the plans need to be revaluated and changed.

This development is being proposed on a block of land that is surrounded by walk streets and special care needs to be taken to respect the visual
and neighborly atmosphere that is the trademark of Venice Beach. The proposed scale of the development is way too large for the bus depot area
and will set a bad precedent in a neighborhood where much of the housing is single family units. Also a thorough study into the sewer lines needs
to be performed. How will this huge developemnt impact the existing sewer system of the surrounding resisdences, when that system is already
inadequate? This deserves serious consideration.

At the proposed size, traffic in the area would be adversely impacted on a daily basis. The alleys around the proposed development need to be included
in the environmental and traffic impact report and all other studies. Especially the alley which runs in between Pacific and Main St, Royal Court as
well as the first alley west of Brooks which connects Brooks to Thorton. These are very narrow alleys and can't handle a lot of traffic. They can not
be made into one way alleys because of the angles cars need to be at to park. Many of the owners' cars need to enter in different directions. Not to
mention during the summer and weekends, when traffic and parking are already a problem, this development will generate a traffic and parking
nightmare. I firmly believe that the developer needs to significantly reduce the number of units.

I strongly oppose any waiver of the height limits for any part of the new development. The height limit in this neighborhood is 35 -- the developer
has requested 50 feet. This is absolutely unacceptable. All new developement would take advantage of this precedent. I would like to see the
Environmental Impact report and a Costal Commission report. The impact of this proposed development must be thoroughly evaluated.
I fear that this development will destroy much of the historic charm that makes Venice such a wonderful place to live and to visit.

I am also concerned about the material they plan to use will reflect a lot of heat and bounce a lot of traffic

and other noise. This already a problem
with the new developement across from the proposed developemnt on Main, VeniceArtLofts. This needs to be studied and rectified.
From what I understand about the proposal thus far, the consequences seem disastrous for this neighborhood.

If cafes are to be included in the project, the garbage collection areas must be designed so that foul smells and refuse do not escape into the neighborhood.
There needs to be a guarantee of this, as we have all seen local developers trample on the quality of life for the community in this regard. I would also like
to see guidelines set up as to what type of cafes and restaurants can be permitted. Specifically, I would like to see a ban on fast food especially in regard
to certain types of packaging -- like the papers that wrap hamburgers. Weekend visitors already dump their trash on our property, fast food packaging
would only increase this exponentially.

Please let me know if this letter is reaching you in time to make sure my concerns are all addressed in the upcoming studies and reports.
I would like to attend any future meetings, so please continue to make sure the community is notified.
Thank you for your time and attention.

Sincerely,

Elizabeth Keith
128 Park Place
Venice, CA 90291
TEL: 310-452-1907
E-MAIL: lizakeith@comcast.net

Sunset Avenue Project
Scoping Meeting
Wednesday, April 7, 2004

Written Comment Form

The purpose of the public scoping meeting is to identify the range of actions, alternatives, and significant effects to be analyzed in the Draft EIR for the Sunset Avenue Project. The Project proposes the redevelopment of the Division 6 Bus Depot (Venice) into a mixed-use residential and commercial development.

Comments can be provided verbally at the scoping meeting or in written form. The City of Los Angeles Department of Planning should receive written comments by April 26, 2004. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed project. Your comments will then be considered during preparation of the Draft EIR.

Are you speaking tonight? ___ *Yes* ✓ *No*

For all citizens of Venice, The proposed Sunset project is too dense and extremely ill conceived. My objections include The Number of proposed dwellings and The Number of cars, Trucks, delivery vans etc. The project will affect, not only for it Lifetime, but in its Construction.

What about remix with dwellings above and dedicating the remaining Land For A much needed Venice Park and Community Center.

IF That can't happen a CONTINUATION of the WALK Streets would be more in keeping with The Spirit of Venice. No height variances please.

Name: Stephen Pouliot
Address: 1223 Cabrillo Ave.
Venice, CA. 90291

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Sunset Avenue Project
Scoping Meeting
Wednesday, April 7, 2004

Written Comment Form

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Are you speaking tonight? ___ *Yes* ✓ *No*

I AM IN FAVOR OF THIS PROJECT.

I AM CONCERNED THAT THORNTON PLACE MIGHT BECOME A THROUGH STREET CONNECTING WITH OCEAN. MAKING IT BUSY AND VERY NOISY.

I AM CONCERNED WITH THE PROPOSED HEIGHT OF THE BUILDINGS. 30 FEET -?? I AM AWARE CODE - BLOCKING VIEWS + LIGHT.

I AM CONCERNED THAT THERE MIGHT BE EGRESS FROM THORNTON INTO THE SITE - THIS CREATING A HIGH VOLUME OF CARS EVEN LORRIES CREATING NOISE FOR THE STREET

Name: CHRISTOPHER RENSHAW
Address: 120 THORNTON PLACE
VENICE
CA 90291.

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

With thanks

Sunset Avenue Project
Scoping Meeting
Wednesday, April 7, 2004

Written Comment Form

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Are you speaking tonight? X *Yes* ___ *No*

Name: Carol Tucker
Address: 3513 Cochran Ave
L.A 90016

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Bus Traffic @ New & MTA location
Bus access, Bus routes from new site
clear language

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

Sunset Avenue Project
Scoping Meeting
Wednesday, April 7, 2004

Written Comment Form

The purpose of the public scoping meeting is to identify the range of actions, alternatives, and significant effects to be analyzed in the Draft EIR for the Sunset Avenue Project. The Project proposes the redevelopment of the Division 6 Bus Depot (Venice) into a mixed-use residential and commercial development.

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Are you speaking tonight? X *Yes* ___ *No*

Name: Jean Sedillos
Address: 2118 Wilshire Blvd
Santa Monica
CA 90403

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Proximity to street traffic

Pkg validation for retail, guest Pkg

location of loading docks + garbage → Noise

Height

Traffic study to be done Summer

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

Sunset Avenue Project
Scoping Meeting
Wednesday, April 7, 2004

Written Comment Form

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Are you speaking tonight? ✓ *Yes* ___ *No*

Name: Polly Furr
Address: 1312 Cabrillo Ave.

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Urban Design, [redacted] scale is excessive, monolithic excessive density

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

Sunset Avenue Project
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Are you speaking tonight? X *Yes* ___ *No*

Name: TOM ELLIOTT
Address: 115 BROOKS AV

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contamination, Haz Sub's on site pkg. - provide public pkg, off-street. Design

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? (Yes) ___ No

Name: Jon Sedillos
Address: 2118 Wilshire Blvd #940
Santa Monica, CA 90403

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Do Traffic study during Summer-Wknd.
No restraunts due to noise + garbage
More stop lights

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

Concerns
Density
Cross Pacific Connection
Height
Parking

Name: ERIC Mankin
Address: 41 PALOMA Ave
Venice CA 90291

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Density
Lower density alternative comparable to surrounding density w/a walking street.

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

Name: Chuck Dokoushi
Address: 814 Pacific Ave 90291

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Density! Only Main ST. access
30 ft setbacks ✓ Sunset + Thornton

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

Name: Bonnie Cheeseman
Address: 40 Rose Av
GRVNC Board
Parking Chair

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Height, opposed to SPE

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ___ *Yes* ___ *No*

Name: ARNOLD SPRINGER
Address: 1666 Electric Ave
Venice

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Density
Coastal Access - inhibit access
Contrary to local land use policy.
retain surrounding density include walking sts
to provide coastal access
maintain current access patterns.

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

Name: JIM MUNEZ
Address: 804 MAIN ST
VENICE

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

underground utility poles - Aesthetics
Noise to residents w/ Gyms
wants complete Main st frontage commercial.
setbacks from st. to create open space
Sewer capacity? - where does it hook in
Water mains Tape here will Main st need
to be dug up to put in utility lines
No interior green space, Heat Island effect
Aluminum facade + Noise reflection
Surface water runoff
Affordable Hsg #s
police + Fire

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? X *Yes* ___ *No*

Name: NEIL GRECO
Address:

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

wants No exception from Venice SP.
Main St. primary access

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

TRAFFIC IMPACT
PARKINGS
★ CROWDING / HIGH DENSITY
SANTA MONICA BUILDINGS IMPACT

Name: CLEA MARKMAN
Address: 126 BREEZE AVE
VENICE

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Cumulative impacts of other mixed use projects along Main st.

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

CHRIS MCCABE

Name: CHRIS MCCABE
Address: 109 BROOKS AVE #3
VENICE

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Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? *Yes* ___ *No*

Name: LAURA BURNS
Address: 1000 DORECHT, #1
VENICE, CA 90291
~~CHAIRPERSON~~ Planning Cmte, Neighborhood Council

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Meeting w/ developer
impact on pkg in beach pkg Zone
Define "Affordable" & its implementation
price of MKt, how people are chosen
incentives for bicycle use bicycle Pkg
current counts for Traffic

Tape here

update traffic counts if FEIR is
more than 2yrs
oil fields / Methane
update Methane per
ordinance revision.
Asbestos + Lead notification
construction Liason
real time inspection
shuttle bus TDM
cumulative impacts

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

Name: CARMEL BEAUMONT
Address: 108 VISTA PLACE
VENICE CA 90291

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impact on Royal CT.
due to Traffic & Construction
emergency vehicle access
Stormdrain impact

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? X *Yes* ___ *No*

Name: MARIE CROSBY
Address:

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related projects
traffic on substandard alleys
pedestrian safety

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

HELEN HOOD SCHEER

132 Park Place - Venice, CA 90291
Tel: 310 399 2433 - E-mail: hh_scheer@earthlink.net

EAF No: ENV-2004-1407
Project Name: Sunset Avenue Project (Venice)
Project Address: 100 East Sunset Avenue

April 7, 2004

Dear Mr. Liao,

Although I support having a mixed-use space development at 100 East Sunset Avenue in Venice and I am glad that the bus depot will be relocating, I do not support the current development plans. I have very strong concerns about the impact the proposed project will have on the neighborhood and believe the plans need to be changed.

This development is being proposed on a block of land that is surrounded by walk streets and special care needs to be taken to respect the visual and neighborly atmosphere that is the trademark of Venice Beach.

The proposed scale of the development is way too large for the bus depot area and for the precedent set in the surrounding community. I firmly believe that the developer needs to significantly reduce the number of rental units. At the proposed size, traffic in the area would be adversely impacted on a daily basis. During the summer and weekends, when traffic is already a problem, this deserves serious consideration.

I strongly oppose any waiver of the height limits for any part of the new development. The height limit in this neighborhood is 35 -- the developer has requested 50 feet. This is absolutely unacceptable.

If cafes are to be included in the project, the garbage collection areas must be designed so that foul smells and refuse do not escape into the neighborhood. There needs to be a guarantee of this, as we have all seen local developers trample on the quality of life for the community in this regard. I would also like to see guidelines set up as to what type of cafes and restaurants can be permitted. Specifically, I would like to see a ban on fast food and certain types of packaging -- like the papers that wrap hamburgers. Wrappers and such would be discarded on our walk streets.

I would like to see the Environmental Impact report and a Costal Commission report. The impact of this proposed development must be thoroughly evaluated. I fear that this development will destroy part of the historic charm that makes Venice such a wonderful place to live and to visit.

Thank you for your time and attention. Unfortunately, I will not be able to attend tonight's meeting. I want to attend any future meetings, so please continue to make sure the community is notified.

Sincerely,

Helen H Scheer

Helen Hood Scheer

April 8, 2004

Jimmy Liao, Project Coordinator
EIR Unit
City of Los Angeles Planning Department
200 N. Spring Street, Room 525
Los Angeles CA 90012-4801

Con Howe
Director of Planning

RE: EAF ENV-2004-1407
Sunset Avenue Project

Gentlemen:

I am a property owner, resident and architect, residing in the immediate vicinity of the above referenced project. I have the following comments:

1. I strongly object to the proposed maximum building height of 50 feet for the following reasons:

   1.1 The City of Los Angeles Specific Plan for this area allows a maximum height of only 30 feet.

   1.2 Every single structure in the 800 block of Pacific Avenue, immediately adjacent to the site, is only 30 feet high; exceeding the predominant building height in the area is not acceptable.

   1.3 Every single structure along Main Street and immediately adjacent to the site is only 30 feet high; exceeding the predominant building height in the area is not acceptable.

   1.4 Several residential projects, both single and multi-family, have been constructed in the Venice area within the last 5-years; all projects complied with the height limit of the Specific Plan and none of these projects were allowed to exceed 30 or 35 feet in height. Allowing this project to exceed the height limit would show undue favoritism.

2. I feel that the proposed mix of one and two bedroom units will not serve the needs of the residential community. I suggest that several 3-bedroom units should be included in the mix.

3. The proposed open space is so fragmented that will have no positive impact. What we see are "passageways" and "walks" only. No substantial open space is included. A project of this magnitude should include at least one large open/landscape park

area, to be used both by the residents of this development as well as the public. The alleged proposed "community courtyards" are, quite frankly, invisible on the proposed plan.

4. A gym is one of the proposed commercial uses. There is already several gyms and yoga studios within walking distance of the project. I urge the city to give the developer incentives so as to attract a food market as a tenant. This is the one use that will truly serve the community.

5. I strongly object to locating any parking access to the project along Thornton Place. The scale of the neighborhood in that location does not allow vehicular traffic of the magnitude of the proposed project.

6. As a necessary part of traffic mitigation measures, it is imperative that a left-turning signal is installed for south-bound traffic at the corner of Pacific and Brooks. According to the Department of Transportation statistics, this intersection has one of the highest numbers of traffic collisions in the entire city of Los Angeles.

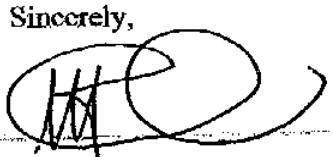
7. In order to properly evaluate the impact of the proposed development, the community needs to see the following:

    7.1 A comparison of the number of vehicular trips generated by the current use of the site versus the number of trips by the proposed development.

    7.2 A comparison of the proposed residential density (no. of residential units per acre) with that of the existing neighborhood.

Please feel free to call my office if you have any questions regarding this matter.

Sincerely,



Lazaros Papademetropoulos AIA
806 Pacific Avenue
Venice, CA 90291
(310) 204-1400 x104
Lazarchitect@hotmail.com

April 8, 2004

Jimmy Liao, Project Coordinator
EIR Unit
City of Los Angeles Planning Department
200 N. Spring Street, Room 525
Los Angeles CA 90012-4801

Con Howe
Director of Planning

RE: EAF ENV-2004-1407
Sunset Avenue Project

Gentlemen:

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Sincerely,

Jennifer Finley
806-1/2 Pacific Avenue
Venice, CA 90291
(310) 309-0390

Sunset Avenue Project
Scoping Meeting
Wednesday, April 7, 2004

Written Comment Form

The purpose of the public scoping meeting is to identify the range of actions, alternatives, and significant effects to be analyzed in the Draft EIR for the Sunset Avenue Project. The Project proposes the redevelopment of the Division 6 Bus Depot (Venice) into a mixed-use residential and commercial development.

Comments can be provided verbally at the scoping meeting or in written form. The City of Los Angeles Department of Planning should receive written comments by April 26, 2004. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed project. Your comments will then be considered during preparation of the Draft EIR.

Are you speaking tonight? ___ *Yes* X *No*

My Concern is only a concern for Sunset Ave so I chose not to speak. Others covered problems better than I could. But if the traffic coming out of the project from an underground garage, at night, comes at a right angle to Sunset, our house will be flooded with light from headlights. The traffic should come onto Sunset at an angle to prevent, or lessen, the impact of the headlights

Name: Jim Coleman
Address: 115 Sunset Ave
Venice Ca 90291

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

TIM RUDNICK
330 MARKET ST
VENICE CA. 90291

April 7, 2004

To Jimmy Liao, Project Coordinator
City Planning, EIR Unit

Dear Mr. Liao

I would like to add my voice to those who have expressed their alarm at the prospect of the City approving the Sunset Ave. Project.

I am a longtime resident of Venice (38 yrs.) and have witnessed many changes here, some for the good, some for the bad. Lately this community is adjusting to what seems a run-a-wa gentrification. This gentrification endangers the very spirit of Venice's neighborhoods, namely its rich diversity of peoples & cultures.

Simply put, the Sunset Ave Project threatens to overwelm the neighborhood especially with its aesthetics and also with traffic. It is important that the number of units be reduced and that the project be scaled back to a more appropriate size.

Sincerely Tim Rudnick

TIM RUDNICK
330 MARKET ST. VENICE

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Are you speaking tonight? ✓ *Yes* ___ *No*

Name: GAIL ROGERS
Address: 33 PARK AV.
VENICE, CA. 90291

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Commented on a recently defeated project (i.e., Wal-Mart) by the residents of the local community where it was proposed to go.

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

Name: RON HARRIS
Address: 1215 CABRILLO AVE
VENICE CA 90291

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Pkg.

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

Name: I RA KOSLOW
Address: 33 PARK AVE

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Design → Aesthetics, Air qual. Traffic, loss of on-street pkg? ingress, egress access points

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

DENSITY IS much too high.
Restaurant is a problem - other
NON-FOOD SHOP MIGHT BE OKAY
PARKING & ROADWAY DENSITY
IS PROBLEMATIC

Name: MARK CROSBY
Address: 108 DUDLEY AVE
VENICE, 90291

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Excess Density → Traffic, Noise, Air poll. runoff ∴ restraunts → disease vectors, garbage
prefer retail to restraunt.
open space, parks
public

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? X *Yes* ___ *No*

re: height variance.

Name: Chris von boetz
Address: 44 Sunset Ave
LA, CA 90291

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Height limits -

Density issue - too many units

Traffic

ingress, egress - Thornton & Sunset constraint

Vietnam Memorial Wall - local cultural monument

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ___ *Yes* ___ *No*

1) Discuss impact to parking in the Beach Parking Impact Zone
2) Clarify what is meant by "affordable condominium. Will there be condos for low & very low income. What is the anticipated price? What is the term (30 yrs, 55 yrs?) on the affordable units? How will it be enforced?
3) What contributions will be made to encourage bicycle traffic to reduce reliance on cars?
4) In traffic analysis, need to use current counts, must include summer weekend counts
5) Consult more than city's maps of oil fields & abandoned wells. Need to include adjustments to methane ORDINANCE
6) While Venice Beach provides park, nevertheless, ⇒ new park & open space is required. Project should include

Name: Laura Barns
Address: (Landuse & Planning Committee, Neighborhood Council)
1000 Doreen Pl #1
Venice, CA 90291

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

6) public open space, appended to us renal space

7) asbestos & lead paint. Need to have complete studies which need to made public. 500 ft Residents + sensitive receptors should be notified well in advance of begining removal should have construction liason with enforcement during removal, not when applying for permits - studies available in libraries

Tape here

8) soil contamination

9) traffic light phasing should be included in traffic + safety studies

Place postage here

10) mitigate traffic impact with contributions to shuttle shuttle buses

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

buses - Lincoln, Main Venice Blvd, Rose

11) subject to commercial corner ordinance,

12) aesthetics, open to the neighborhood

13) storm sewer system - runoff onto ocean

14) sign up sheet for Baldwin Hills

15) public library copies

16) cumulative impact -

Tape here

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Are you speaking tonight? X *Yes* ___ *No*

AFFORDABLE HOUSING - INACCURACY IN THE NUMBERS

Name: IVEN DILLING
Address: 510 PACIFIC AVE #6
VENICE CA 90291

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

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Are you speaking tonight? ✓ *Yes* ___ *No*

traffic
parking
type of shops (chains)
POW mural

Name: Patricia Greenfield
Address:

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Traffic – No ingress, egress on Alleys (Sunset, Thornton)

Pkg – make excess available for public rental

Pow Mural – preserve.

Tape here

Place postage here

Mr. Jimmy Liao
Project Coordinator
City of Los Angeles Department of Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Tape here

April 18, 2004

Mr. J. Liao
Project Coordinator
City of Los Angeles
Dept. of Planning
200 N. Spring Street
Room 763
Los Angeles CA 90012

RE: MTA Bus Facility at 100 Sunset Ave. in Venice

Dear Mr. Liao,

It is true and impossible to stop progress or change, both are good and necessary when carried out with consideration for the present and the future. The proposal by RAD Jefferson Development to be given a height change from 30 feet to 50 to build on the MTA site is not necessary, and detrimental to keeping the Venice Beach area an appealing and environmentally friendly place. You have seen that Venice is fast loosing its skyline to many new buildings that are going up, or in the planning stages . If the height restrictions are not enforced and protected from changes we will all have to walk to the beach to see the open sky. This project can be done with the height regulations that are in effect. If the contractor believes it is not cost effective you will have a long list of others who can build it with the code now in effect. Please protect what remains of the Venice Coastal area. Thank you for your consideration to our community.

Sincerely,

Nick Mele

P.S. Please excuse my printer.

N Mele
P.O. Box 1233
Venice, CA 90294

Jimmy Liao
200 N. Spring St Rm 763
L.A. Ca 90012

Dear Mr. Liao,

I am writing in regards to the MTA property on 100 Sunset Ave. in Venice.

The project inhibits Coastal access. the Walk Street feel should extend through the property.

I also believe that Moderate Income housing should mean Low and Very low income housing.

A grocery store — maybe even a Trader Joes should be in the project.

Also, the owner/builder/architect of the project should not be allowed to build those God awful Art Bunkers that they've built accross the street.

Yours Truly
Carol Berman
5 Rose Ave #26
Venice Ca 90291
Phone 310 396-0811

P.S. No Height Depth exemptions in Re: Coastal Comm. Regs., unless Low and Very Low income housing and/or Community Access to Community Room.

C B.

From: "hannah harpe" <hannahvonluvnkiss@hotmail.com>
To: <JLIAO@planning.lacity.org>
Date: 4/22/04 5:10:29 PM
Subject: housing on thornton place in venice

dear planning commissision,

I am a resident of thornton place. I strongly disagree with the housing/ commercial project planned for the MTA bus depot area on main street in the venice beach district. I would not like to see an increase of upwards of two hundred to six hundred cars tearing down the streets of Main Street and Abbot Kinney. The traffic congestion would seriously debiltate the beach environment. The appropriate birds living in our surrounding trees and clean air. I strongly encourage a new plan to be organized. OUr city is very important to its residents. We have much traffic in the summer that is currently unbearable. The program for housing and commercial additions would sufficate any sort of freedom with its high paying residents. Furthermore, the growth of our city could use much more efficiently parks to encourage peace and harmony among its neighbors. I urge you to not continue with such an incredible growth distrubance that our residents and streets cannot bear the brunt of any more dabilitating movement.

Thank You,
Sincerely,
Hannah Leslie

From: Lewin Wertheimer <lewin@wertheimer-architect.com>
To: <JLIAO@planning.lacity.org>
Date: 4/22/04 6:42:18 PM
Subject: FAF NO. ENV-2004-1407 Sunset Avenue Project (Venice)

22-April-2004

Jimmy Liao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, CA 90012
(213)978-1331
(213)978-1343 (fax)
E-Mail: JLIAO@planning.lacity.org

Regarding: FAF NO: ENV-2004-1407
Project Name: Sunset Avenue Project (Venice)

Dear Mr. Liao:

I live and work about 3 blocks from the subject property and have done so for the last 20 years. I am an architect and have in the past been active with Venice planning issues. Since I am not currently involved with Venice Grass Roots or other local groups I was disappointed that I did not receive a notice of this pending project.

The architects for the project, Koning Eizenberg have a very good reputation and have designed some wonderful projects in the past. I therefore can only think that the developer of this project is the driving force regarding what appears to be an overly ambitious program. The surrounding area of this project is low and medium density residential with some offices and gyms nearby. This project seems to ignore the neighborhood by continuing the super block of MTA with this incredibly dense out of scale project. I strongly believe that no variances should be granted that would allow for an increase in density , square footage, or height. I think the affordable housing feature of the project is wonderful and greatly needed but not at the expense of adding to the congestion of an already very busy crowded part of the city. There should be strict requirements to study the environmental and traffic impact this project will have on the neighborhood.

I am very excited that MTA will be moving but I do not believe the city should grant the discretionary requests of this predominantly for profit development without important neighborhood benefiting concessions being made such as affordable day care or some public open space that is not just for dogs.

Thank you for the opportunity to comment on this project.

Sincerely,

Lewin Wertheimer

Con't (From Lucy Rizo)

I won't even go into the height issue as I am intelligent enough to know that the builder will not change the height as he has already made a deal with the city to get what they want.

I am sorry to have missed any meetings pertaining to this issue and hope to be able to attend future meetings.

Thank You.

Lucy Rizo
116 Thornton Pl #B
Venice CA 90291

Date: 4/26/04

From: BRIAN W. KASELL

Please deliver to: JIMMY LIAO

Facsimile Number: 213.978.1343

Telephone:

Total Number of pages (including this sheet): 6. If you did not receive this number of pages, please contact our FAX operator at (310) 203-8080 ext. 6626

Message:

41 SUNSET AVENUE CONDOMINIUM ASSOCIATION
C/O BRIAN W. KASELL
41 SUNSET AVENUE # 301
Venice, California 90291
Phone: (310) 785-5330
Fax: (310) 203-0567
e-mail: bwk@jmbm.com

April 26, 2004

VIA FACSIMILE: (213) 978-1343
Jimmy Liao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, California 90012

Re: Sunset Avenue Project (Venice)
EAF NO.: ENV-2004-1407

Dear Mr. Liao:

The members of the 41 Sunset Avenue Condominium Association (the "Association"), both individually and on behalf of the Association, write to you in connection with the above-identified proposed development project. Specifically, we wish to express our concerns over the proposed scope of the project and the adverse impact the project will undoubtedly have on the quality of life in our neighborhood.

As we are sure the City of Los Angeles and its Planning Department are aware, the Venice community, especially in the areas within a few blocks of the beach, is already one which suffers from extreme difficulties relating to parking. At certain times of the day, it is basically impossible to find a parking place on the street in the vicinity immediately surrounding the proposed project. These parking problems are greatly exacerbated both on weekends and during the warmer months when large numbers of visitors descend on Venice.

Further, traffic congestion is a perennial problem in the area. Pacific Avenue is, on a daily basis, so crammed with traffic (in both directions) that drivers seeking to enter the street must often wait for an extended period of time to do so (and usually are only able to get on the street through the courtesy of another driver who stops and lets them in). On weekends and warmer weather periods, the traffic congestion in the area is nothing short of overwhelming.

We believe that the proposed project presents an unacceptable risk of dramatically increasing the area's parking and traffic problems. First, the project proposes to add, in a small and relatively restricted location, 225 residential condominiums, as well as 13,500 square feet of retail space. The additional cars and traffic that will be generated by these

numbers will have an immediate and highly negative impact on the area's parking and traffic problems.

More importantly, the location of the proposed project will enhance those problems. The block where the proposed project is to be located was never designed or intended for this kind of high-density residential dwelling or commercial use. The streets at the north and south boundary of the proposed project (*i e.*, Sunset Avenue and Thornton Place), which apparently will provide the only ways to enter and leave the development, are very small, one way streets that will simply not be able to handle the massive increase in traffic that will accompany the project.

In short, we believe the present scope of the proposed project is overreaching and will have severe adverse impacts on our neighborhood and quality of life. We believe a smaller development, with a reduced number of residential units and a reduced amount of commercial space, would be a more appropriate use of the space that will be opened up upon the City's leaving the existing bus depot.

Further, although we have focused on parking and traffic, there are other factors militating against the proposed project's present scope, including the aesthetic impact of the project on the traditional nature of the Venice community (which has an unusual history and occupies a unique place in the Los Angeles landscape), the quality of the air in the neighborhood (which will no doubt be significantly impacted), and even the fate of the Vietnam MIA Memorial which lines the Pacific Avenue side of the west wall of the existing bus depot.

We are concerned about the quality of life in our neighborhood, and wish to be heard in connection with the proposed project, which we believe will adversely affect that quality of life in a number of ways. Accordingly, please keep us posted as to further meetings and/or decisions concerning the proposed development.

Very truly yours,
The 41 Sunset Avenue Condominium Association:

Thom Magana, Unit 101

Cheryl Buysse, Unit 102

Karen Kelly & Will Pipkins, Unit 103

Tim & Robyn Knappenberger, Unit 104

Mike Caffey, Unit 201

Ted & Michael Peterson, Unit 202

Steve Mason, Unit 203

Mike Barbee & Claudia Kloss, Unit 204

Brian Kasell, Unit 301

Jonathan Del Gatto, Unit 302

Debbie Zeitman, Unit 303

Melissa Goddard & Georgie Smith, Unit 304

Steve Mason, Unit 203

Mike Barbee & Claudia Kloss, Unit 204

Brian Kasell, Unit 301

Jonathan Del Gatto, Unit 302

Debbie Zeiman, Unit 303

Melissa Goddard & Georgie Smith, Unit 304

Steve Mason, Unit 203

Mike Barbee & Claudia Kloss, Unit 204

Brian Kasell, Unit 301

Jonathan Del Gatto, Unit 302

Debbie Zeitman, Unit 303

Melissa Goddard & Georgie Smith, Unit 304

Sunset Avenue Project (Venice)

Comments for:
Jimmy Laio, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, CA 90012
(213) 978-1331
(213) 978-1343 (fax)
E-Mail: JLIAO@planning.lacity.org

Below are listed some of our concerns regarding the environmental impact of this project.

1) The height of the project exceeds that of any of the surrounding residential areas, and would interfere with the view of residents. At present, we look down Royal Court and see the Santa Monica mountains. If this project were in place. We would look down and see buildings 45 to 50 feet in height, obscuring the mountains.

2) The enormous density of the development would overload the surrounding neighborhood streets, leading to congestion and traffic problems. Thornton, for example, is a very narrow street primarily for local residents. It is only a block long, and has no street light where it ends on Main Street. Why shouldn't street lights be proposed for Sunset and Thornton, at a minimum, to make it possible for people to exit into the busy traffic on Pacific and Main Street without risking their lives? Why shouldn't the project residents enter onto Pacific and Main Street from their own property, rather than invading the small local streets on each side? No matter where they leave the project, they must eventually end up on Main Street or Pacific.

3) Danger to residents and visitors. Anyone living East of Main Street must cross both Main Street and Pacific to get to the beach. On Summer weekends the crossing is extremely hazardous, even when there is a signal light. There are accidents every week on Brooks Avenue, which has a signal light. In almost every case the overload on Brooks and on Pacific is partly to blame for the accident. This project would definitely increase the traffic overload on Brooks, which is already suffering from too much traffic. Sunset, which is used by many people to get to the beach, does not even have a signal light -- and it is rare for cars to stop for pedestrians, or even pretend to try to obey the speed limit. Every week there are many accidents on Sunset, due to the crowded and unsafe conditions. This project will increase the problems of accidents and overcrowding.

4) The project does not conform to the Venice specific plan. Deviations from the plan lead directly to the over-crowding, and consequent adverse impact, of the project in terms of traffic hazards and air pollution.

5) To summarize the "exit" problem: Anyone leaving this project must leave either on Main Street or on Sunset. These are the only two avenues to the outside world. If the project has exits on Main Street or on Pacific, then the excessive traffic generated by the density of the project will impact on both Main Street and Pacific. However, if the project exits on Sunset and Thornton, the excessive density of the project will impact on these two small, residential streets, but

will continue to impact on Main Street and Pacific as well; since the project residents must enter either Main Street or Pacific after cluttering up Sunset and Thornton. The proposed Sunset and Thornton exits are simply a way of doubling the adverse impact of traffic leaving the project.

Sincerely,

Edward Alf & Martha Alf

Edward Alf & Martha Alf
103 Brooks Avenue
Venice, CA 90291

Sunset Avenue Project
Scoping Meeting
Wednesday, April 7, 2004

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Are you speaking tonight? ___ *Yes* ___ *No*

(1) I am opposed to using Horizon as an entrance & exit for this private development.

(2) I am opposed to the height of the development the development should adhere to the Venice Specific Plan Policy.

(3) the density has to be reduced to many units (225)

(4) no commercial space. we have allott Kinney & Main St in Santa Monica where are the delivery trucks & trash pick up to enter per

Name: RICK GUNDERSON
Address: 702 Pacific ave
Venice, CA 90291
310-3997370

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

Trevor Dilling
510 Pacific Ave. #6
Venice, Ca 90291
310-396-9345

Environmental Impact Report for the Proposed Sunset Project

The following is a list of concerns I have for the proposed project on Sunset and Pacific, and would like these concerns to be carefully reviewed in respect for my neighborhood and myself.

1. **Density**

   The proposed project would include 225 units on 3 acres that is currently housing the Metro Bus garage. This could create upwards of 500+ people living in a area that is already prone to heavy traffic, both pedestrian and motor vehicle.

2. **Noise**

   Some of the space has already been claimed to be set aside for commercial use, such as cafes and restaurants. The developer claims that he will only allow commercial space fort businesses that will close around 10P.M., but many of us fear that there is no guarantee of this. It would only be a matter of time before the business will wish to extend there hours, or want a liquor license. Noise will also be a factor created by the density of the project, from so many people coming and going at all hours of the day. Another factor in noise is how they attend to frame the exterior of the building. This developer has already built the Venice Art Lofts on Main Street, which has a metal exterior. Some residents have already complained that they hear horrible noise whenever a motorcycle drives by, because the exterior amplifies the sound.

3. **Pollution**

   It is my understanding that the bus garage is sitting on land that has been polluted for many years, dating back to when it was a rail yard. The developer would have to decontaminate that area, with expense being another issue. We as residents would **DEMAND** that not a cent of public funds would be allocated to clean that land for the developer's advantage. He knows going into this what he has to do to make it a livable space and many of us fear he will try to tack on that expense to the public. There is also the issue of gas and power, and what kind of construction is going to be necessary to bring it to the site.

4. **Height**

   The developer has already asked for approval to go as high as fifty feet in the center of the project. This is in violation of the Coastal Commission, and will add to visual congestion of the current landscape. Rad Jefferson should not be given special privileges that the common resident does not have when it comes to

the commissions cap on height.

5. **Parking**

This is a major concern among all residents in Venice. Rad Jefferson claims that they will have up to 750 underground parking spaces available for the residents, but this will not address the issue of visitors to the complex. There is already no place to park in Venice, and this would just add to the already existing problem. As a peace offering, Rad has proposed to put 36 free parking spaces on Sunset, to "give to the community." This will serve the residents no common good unless if it is permit parking for people on that block. This parking will only serve those who live at the proposed site, and those who visit the beach Furthermore, we as residents run the risk of losing our parking privileges on Pacific from 8P.M. to 8A.M. due to the escalated amount of traffic. One more concern is that the developer has hinted he would like to add a second layer of underground parking. This brings up the issue of safety of the water table and safety in event of an earthquake.

6. **Safety**

Crossing the street on either Main Street or Pacific Ave is already extremely dangerous, and unfortunately has led to many casualties over the years. Cars travel down Pacific at speeds up to 60 Mph, and commonly don't stop for the pedestrians. We would need to put a traffic light to insure safety, where there should already be a light. Sunset is a major walking street to the beach, and this project would increase the amount of cars already on the road. The alleys also would receive more traffic from cars driving through them, to get back to Main Street to look for parking.

7. **Traffic**

This is potentially the biggest issue of all and affects virtually everything I've stated above. The following is a list of areas that will feel the majority of the traffic increase. As a neighborhood, **we request that you scope for traffic during the Summer** at these sites when the traffic level is three-fold of what it is during the rest of the year.

A. **Lincoln Blvd**-This is the main artery from Santa Monica to Lax, and will feel even more affect with development in Playa Vista.
B. **Rose**-from Lincoln to Pacific
C. **Rose & Main**
D. **Rose & Pacific**
E. **Sunset & Main**- Pedestrian crossing hazard
F. **Sunset & Pacific**- Pedestrian crossing hazard
G. **Dudley**- Increased traffic in the alley
H. **Brooks**- Increased traffic from Lincoln when you head west towards Main Street

I. **Abbot Kinney& Venice to Abbot Kinney and Main**- This is a heavy shopping district that already has an extreme amount of traffic on it especially on the weekends.
J. **Abbot Kinney and Washington**-Increased traffic from those coming from the east on Washington to take a short cut to the beach.
K. **Windward and Main**-Potential for accidents at Windward circle.
L. **Windward and Pacific**- Heavy foot traffic
M. **Speedway and Dudley**
N. **Speedway and Rose**
O. **Speedway and Paloma**
P. **Speedway and Sunset**
Q. **Speedway and windward**
R. **Electric Ave**

The following is a list of other potential sites that will see increased congestion with increased development, and should not be over looked. All sites serve as major inlets to the beach:

S. **Pico and Main**
T. **Pico and Nielsen Way**
U. **Ocean Park and Main**
V. **Ocean Park and Nielsen Way**
W. **The 10 Freeway exit and Lincoln**
X. **Fourth Street and Pico**
Y. **Fourth Street and the 10 Freeway exit**
Z. **Fourth street and Ocean Park**
AA. **Hampton & Rose**
AB. **Lincoln and Washington**
AC. **Lincoln and Venice**
AD. **Washington and Pacific**

In conclusion, I would like to state my extreme dissatisfaction with the scoping notice that was sent out. It called for 58 units to be allocated for affordable housing, when the developer claims that this was a "typo" and that the real number is going to be around 20 units. This does not deal with environmental issues, but rather a public relations issue. There has been nothing done to correct this information and present it to the neighborhood, since some residents might have had compassion for the developer thinking that he would include that many affordable units. Please see that a revision is made to this error. Thank you for your time on these issues, and I hope changes can be made to avoid this potential neighborhood destruction, and to keep Venice beautiful.

From: <Noradv@aol.com>
To: <JLIAO@planning.lacity.org>
Date: 4/26/04 1:58:35 PM
Subject: Venice MTA Project

Dear Mr. Lao:

I am a homeowner who lives a few blocks away from the proposed project and would like to voice a strong objection to the to the proposed project.

The proposed project is highly insensitive to the surrounding community. It wants to maintain a superblock mentality in a community that prides itself on being open, accessible and charming. If the MTA is going to relocate, this is an opportunity to take this large piece of land and re-integrate it back into the grid of the neighborhood. No project should be allowed to be built that isolates itself from the rest of the Venice Community.

The Venice community on the east side of Main Street has largely been cut off from the beach access due to several large superblocks that run along Main Street. These super blocks include:, starting from the north end of Venice, the complex of Digital Domain and the Old Chiat Day offices between Rose Avenue and Sunset; the land of the old movie studios, which is been partly taken over by the Venice Art lofts, which has sealed itself off from the rest of the community between Sunset and Abbot Kinney, The MTA bus depot between Sunset and Thorton Place; and the elementary school between Abbot Kinney and Westminister.

These superblocks have divided the community into two. As each of these areas, exclusive of the school, are redeveloped, these large pieces of land need to be broken down in order to stitch these two divided communities back together. Santa Monica and even more so South Redondo Beach have both made these planning mistakes allowing for large, isolating, superblocks to divide there communities into pieces. They have learned from there mistakes and now no longer allow this type of development to occur. The Venice community should as well learn from their mistakes without having to make these mistakes again.

Besides the larger contextual issues, the proposed project has no relationship even to the two residential streets, Thorton Place or Sunset Avenue, that borders it on the north and south sides of the street. Both of those streets should be widened and Thorton Place should become a through street to Pacific once again. Any housing along those two streets should have their fronts, not backs, facing the two streets.

Granting a height variance of 50 feet is absolutely not acceptable. This would be completely out of character with the surrounding height of the existing neighborhood.

Although I welcome the thought of the MTA bus depot relocating, I do not do so if this type of development is to occur. This proposed project would be highly detrimental to the Venice Community. It is completely out of scale and out of character with the existing community and turns its back to the Venice Community.

Respectfully submitted,
Nora Dvosin
117 Wavecrest Ave
Venice, CA 90291

From: Kirk Blaschke <kirk@wertheimer-architect.com>
To: <JLIAO@planning.lacity.org>
Date: 4/26/04 1:37:04 PM
Subject: ENV-2004-1407, Sunset Avenue Project (Venice)

Jimmy Lao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, California 90012
213.978.1331
213.978.1343 fax
Email JLIAO@planning.lacity.org

RE: ENV-2004-1407, Sunset Avenue Project (Venice)

Dear Mr. Lao-

I am a homeowner and architect, who lives a few blocks away from the proposed project and would like to voice a strong objection to the to the proposed project.

The proposed project is highly insensitive to the surrounding community. It wants to maintain a superblock mentality in a community that prides itself on being open, accessible and charming. If the MTA is going to relocate, this is opportunity to take this large piece of land and integrate it back into the grid of the neighborhood. No project should be allowed to be built that isolates itself from the rest of the Venice Community.

The Venice community on the east side of Main Street has largely been cut off from the beach access due to several large superblocks that run along Main Street. These super blocks include:, starting from the north end of Venice, the complex of Digital Domain and the Old Chiat Day offices between Rose Avenue and Sunset; the land of the old movie studios, which is been partly taken over by the Venice Art lofts, which has sealed itself off from the rest of the community between Sunset and Abbot Kinney, The MTA bus depot between Sunset and Thorton Place; and the elementary school between Abbot Kinney and Westminister. These superblocks have divided the community into two. As each of these areas, exclusive of the school, are redeveloped these large pieces of land need to be broken down in order to stitch these two divided communities back together. Santa Monica and even more so South Redondo Beach has both made these planning mistakes allowing for large, isolating, superblocks to divide there communities into pieces. They have learned from there mistakes and now no longer allow this type of development to occur. The Venice community should as well learn from their mistakes without having to make these mistakes first before we learn.

Besides the larger contextual issues, the proposed project has no relationship even to the two residential streets, Thorton Place or Sunset Avenue, that borders it on the north and south sides of the street. Both of those streets should be widened and Thorton Place should become a through street to Pacific once again. Any housing along those two streets should have their fronts, not backs, facing the two streets. As far as the request of granting a height variance of 50 feet is absolutely not acceptable. This would be completely out of character with the surrounding height of the existing neighborhood.

Although I welcome the thought of the MTA bus depot relocating, I do not do so if this type of development is to occur. This proposed project would be highly detrimental to the Venice Community. It is completely out of scale and out of character with the existing community and turns its back to the Venice Community.

Respectfully submitted,

Kirk Blaschke

130 Breeze Ave.
Venice, California 90291
ph: 310.392.6665
kirk@wertheimer-architect.com

From: Eric Mankin <mankin@usc.edu>
To: <jliao@planning.lacity.org>
Date: 4/25/04 6:46:33 PM
Subject: development plan for Venice busyard site

Dear City Planners:

I am a resident and homeowner near the bus yard at Sunset Avenue and Main Street in Venice, site of a proposed land swap and redevelopment. I have lived in Venice for 30 years, and in my house on Paloma, a block away from the project, for 20. I have concerns regarding the development proposal as it has been presented, regarding height, density, access, parking and traffic, and neighborhood compatibility.

Taking each in turn.

Height:
The developer has requested an exemption from height requirements, asking to be allowed to build 55-foot structures. I can see no justification whatsoever for such an exemption. The desire of a developer to be able to offer tenants on top floors an ocean view does not in my view constitute grounds for an exemption.

Density:
The other reason for the height is, of course to squeeze more units onto the property: 271 units, according to the proposal. While the north beach area of Venice is denser than much of Los Angeles, the proposed density is far greater than that of nearby blocks. A variance even from the proposed zoning will, I believe be needed to create this density: (if no variance is necessary, the proposed zoning is inappropriate . the desire of the developer to increase his stock does not constitute a grounds for spot zoning. This density will generate consequent traffic flows, addressed below.

Access:
This is of great concern to me. The developer has proposed what amounts to a walled private compound, with only limited public space. Any development must and should provide public areas and public thoroughfare, to provide access to the ocean. Existing residents deal with Venice visitors walking past their houses on walkstreet sidewalks. The desire of a developer to create exclusivity or greater perceived value for his product is not a reason to propose denying access to a parcel of this size. Note that the fact that no public access now exists (or is desired) is not a factor in this: the idea is that what is built should be an improvement not just for its residents, but for the neighborhood as a whole.

Parking and Traffic
The parking will be a large underground structure with space for more than 700 cars, as it must have, since even residents of the numerous small and tiny unites proposed will have one or two or even more vehicles. While Venice as a neighborhood suffers a severe parking deficit, and renting hourly visitor parking space in such a structure is likely to be remunerative, such an arrangement will do nothing to help existing residents without places for cars. Earmarking of 100 or

200 spaces for monthly parking by residents would help, but the underlying problem of traffic would remain, and indeed, be intensified.

From my first-hand experience, the existing bus yard does not generate large volumes of vehicles entering and leaving: I pass the entrance several times daily, and seldom see buses turning in or out.. The proposed structure and commercial development if successful would, putting more pressure on Pacific Avenue, already a dangerous and pedestrian unfriendly thoroughfare; and on Main Street. The problem become extremely severe during commute hours, when a large portion of residents cars will have to make their way out of the garage onto a crowded Pacific Avenue, or a slow-moving Main Street from two or possible three outlets. Stoplights will be required for a starter, but even lights won't help much particularly on the evening side, when cars will be queued up waiting to enter. The problem will become even more severe if entry to and egress from the structure requires passing through a gate or kiosk arrangement -- even if the lot is configured with a large buffer area for cars waiting to enter. It should be noted that Venice's large transient community is always ready to use garage space for shelter.

Neighborhood compatibility.

This seems to me a key concern. This development seems to have been put forward with no regard for its location, in a unique area of Los Angeles consisting of walkstreets. Rather than become part of this fabric, this large lot right in the middle of existing streets proposes to simply ignore its surroundings and build a generic gated-access residential condominium compound. I sincerely hope I am mistaken, but the attitude I sense is that the developer feels he is doing the city and the neighborhood a favor by removing the bus yard, and accordingly, both should be happy with whatever is proposed. But while the bus yard is not picturesque, it has co-existed with the neighborhood for decades, and his negative impacts, such as they are, have largely been mitigated. The impacts of the proposed development, in contrast, will be considerable.

Alternative:

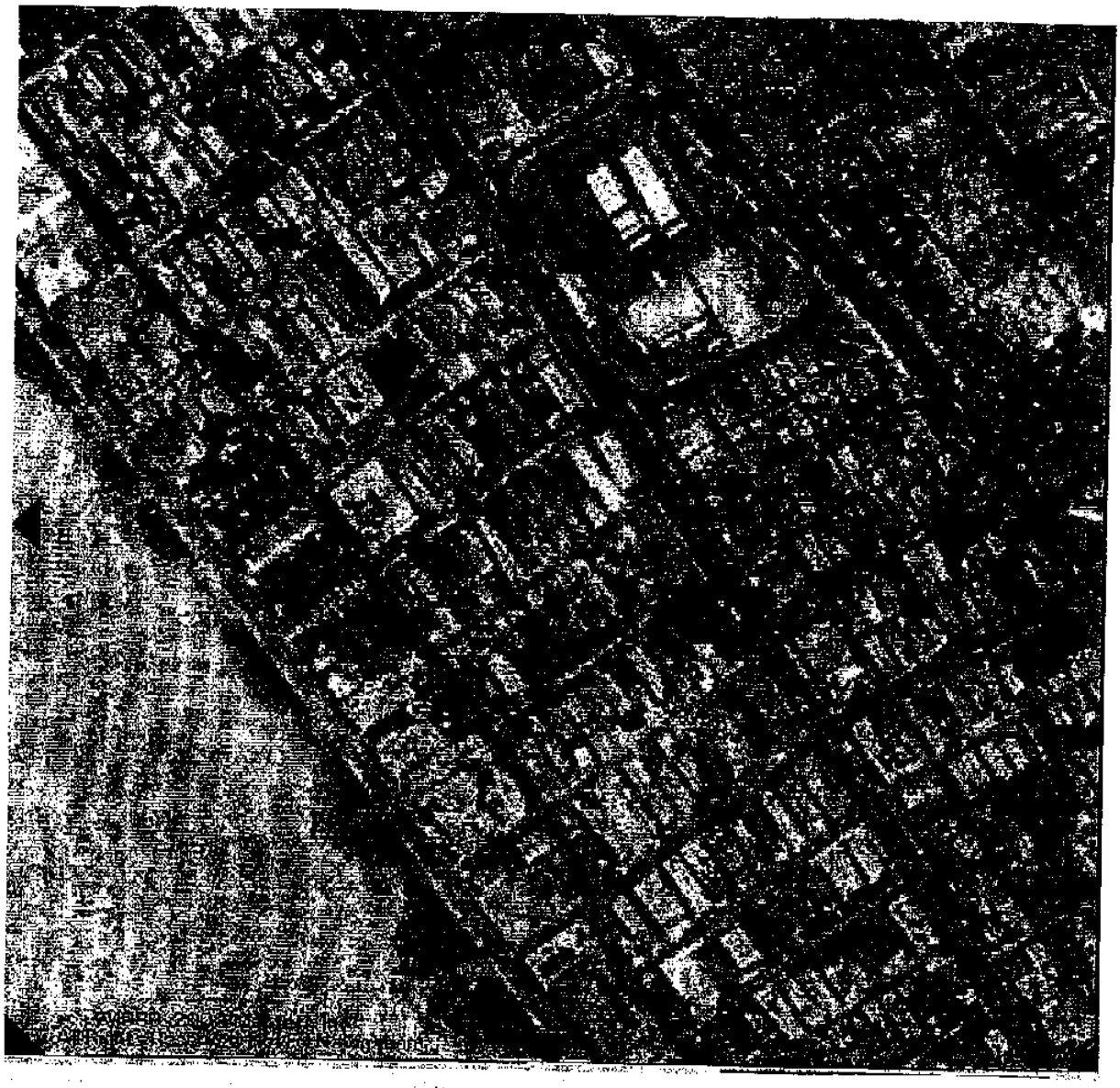
A clear alternative exists, it seems to me. The lot could create -- or, more accurately I think -- recreate two walk streets. A continuation of Thornton Avenue, and a continuation of Sunset Ave, with a continuation of Sunset Court for vehicular access. These walkstreets would be able by my rough estimation hold approximately standard 32 new Venice 30-foot wide, 90- or 120-foot deep lots This would be a minimum 64 units as duplexes, considerably more if a mixture of housing types were introduced, including possible affordable housing, comparable to what exists on other walk streets. Each unit would come with its own individual solutions to parking. The additional load on the street system would be less, and it would not involved the queuing, congestion, and security issues of a single giant garage. don't think this would be a financial sacrifice tor the developer. An undeveloped walk street lot is now worth more than $800,000. Commercial use would be possible at the Main Street end of the street. This concept would allow multiple architects to rethink and explore a unique Los Angeles architectural environment -- the walk street -- with a blank canvas.

A very rough illustration showing this concept from the air is

attached to this message.

Conclusion:
I believe that this project is hastily conceived without regard or sensitivity to the neighborhoods history, problems, or sensibility. I believe imaginative alternatives exist that will be more in keeping with Venice, while still extremely remunerative for the developer.
E

--
Eric Mankin
41 Paloma Ave.
Venice, CA 90291
310 396 4986



From: Ira Koslow <ikoslow@earthlink.net>
To: <JLIAO@planning.lacity.org>
Date: 4/25/04 5:00:23 PM
Subject: EAF NO: ENV-2004-1407 Sunset Avenue Project (Venice)

I have also attached the following as a Word 2000 document.

April 25, 2004

To: Jimmy Liao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, CA 90012

From: Ira Koslow
33 Park Avenue
Venice, CA 90069

Re: EAF NO: ENV-2004-1407
PROJECT NAME: Sunset Avenue Project (Venice)

Dear Mr. Liao,

It is absolutely astounding that a project of this magnitude and density is being proposed for this site and that the developers expect the residents and city to cave under to their demands for variances in every quality of life matter that has been evolved over years by our community. All this so that they can increase their profit margins! My specific environmental concerns are:

A. Transportation/Traffic

Currently the north/south traffic on Pacific Avenue is at a standstill all weekend long and southbound from about 5:00 â€" 7:00 p.m. every day. This situation has always been present on weekends and now that the Playa Vista Project is filling up the spillover from Lincoln Blvd. has made the weekday traffic just as crowded during rush hour. This environmental impact was never discussed during that project so we want to make sure that we cover all the traffic concerns for this one.

1. North/south
a. Pacific Avenue from Pico to Washington Blvd. on weekends and from 5:00 â€" 7:00 p.m. on weekdays.
b. Main Street from Pico Blvd. to the traffic circle on Windward at the same times.
c. Lincoln Blvd from the 10 freeway to Jefferson at the same times.
d. 4th street from Pico south to California â€" this will be used as overflow.
e. Speedway, which will also be used as overflow from Navy to Venice Blvd.
2. East/west
a. Rose Avenue from Lincoln to Speedway
b. Brooks Avenue from Lincoln Blvd. to Speedway.
c. There are currently no high density streets that go east/west south of Ocean park until Venice Blvd. What are these new 750 cars supposed to use?
3. Sunset, Thornton, Main and Pacific Avenues

What are the plans for traffic control at the ins and outs of the parking garage(s)? There seem to be plans for garages entrances/exits on Sunset, Thornton and Main Streets. These have not been specified and there is a fear that all traffic patterns will be upset. Thornton and Sunset are way too narrow, Pacific currently has no opening from Sunset to Main and Main Street is a main north/south thoroughfare.

The general concern here is that the proposed project of 225 units with a large commercial/retail space currently has very little traffic generated at all except for when the buses leave and return. A neighbor measured the bus yard and then compared it to the walk streets nearby and found that there were about 86 houses in an area slightly larger. This is the density that would be reasonable to ensure that the traffic problem would not grow uncontrollable. How are these new people supposed to travel east/west at all or

during the high-density times north/south?

B. Parking

The plan envisions underground parking for 650-750 vehicles. This will have to go down 2 levels, which involves hitting water and all the problems that come with that. When this happens the parking plan will have to change, what are the alternatives? This has happened with all projects that dig down near the beach and Iâ€™m sure the city will somehow wind up eating the costs or giving more variances to help them out. But this aside we need to address:

1. Pacific Avenue

Currently we have parking on Pacific Avenue from 8:00 p.m. to 8:00 a.m. every night. With the amazing increase in north/south and east/west traffic, this will become an impossible situation to continue. What alternatives are offered? What do we do with the residentsâ€™ cars?

2. Sunset Avenue

This is a very narrow street with parking on the north side only. It looks like the only entrance/exit from the walled compound is on Sunset and although the developers have promised additional street parking there is no room. Also it currently goes one-way west, will it become two way?

3. Main Street

There is to be an entrance to the commercial spaces on Main Street. What happens to the spots lost to the driveway, which will have to be two lanes in and two lanes out? Also the traffic flow on Main will be obstructed with cars going in and out of the garage. Will the curb lane be completely lost to parking?

4. Thornton Avenue/Court

It currently does not open to Pacific. Will it be opened and what is the effect on north/south traffic. Also how wide will it be, will it be two way?

5. All other streets within a Â½ mile radius.

With all other street parking gone, the effect will be felt on the street parking everywhere within the neighborhood of the walled complex.

C. Hazardous Materials/Environmental Cleanup

The space currently is an MTA bus yard. Before that it was a railroad yard. The MTA was exempted from environmental cleanup when they took over the yard. There is a tremendous amount of clean up involved to the area. Who is responsible? Is the city going to be stuck cleaning up the project for the developers? What fiscal responsibilities have been hidden in the deal to stick the taxpayers when the clean up costs become known? How is the clean up going to be handled? Are the residents going to be exposed to toxic poisoning without their knowledge?

D. Land Use/Planning

The Sunset Avenue Project is a gated community shielding the residents from the Venice community and keeping the community out. It is projected as 50-foot buildings in the center with no streets through the project. All entrance and exit is to be from the parking garages. This is not in the plan that has been carefully prepared and followed by the residents. Years ago we had a voluntary rollback in zoning to a lower level. Now the developers want to come in and take advantage of that and build extremely high-density units going against the Venice zoning plan. The variances in height are also unacceptable.

E. Beach Access

We have kept the density low in our area to guarantee beach access to the general population of Los Angeles. The visitors and tourists, not the residents, cause traffic congestion in the area. By allowing a high-density gated community to occupy that space, you are reducing the access to the beaches to the general LA population. The added congestion, reduced street parking, and gated community mentality are certainly not in the best interests of open beaches.

F. Air Quality

The current use by the bus yard certainly effects air quality in the times that the buses leave and return to the yard. By creating the high-density gated community along with the commercial spaces you are adding tremendous amounts of pollutants to the area. Again, if the density was the same as the nearby areas, the effect would be minimal. By having a commercial center there, you must reduce the number of units to keep the air quality within reasonable bounds.

G Aesthetics
This developer has shown a complete disregard for a livable standard of living in the other units he has just built nearby. He has built metal buildings that create a hot spot in the area. Also the metal sidings echo the sounds of the cars, trucks, buses and especially motorcycles that ride on Main Street. The sound is deafening when a motorcycle goes by. To add more of the same is unreasonable and detrimental to the quality of living. The concept of a gated community also shows a lack of respect for the aesthetic quality of the whole neighborhood. We have houses built along walk streets creating an environment that has lasted since Abbott Kinney built Venice. To have high density, high rise condos placed in a gated community in the middle of our neighborhood is contrary to everything we have fought for in Venice since its existence.

The main focus of this protest is the specific plans that this developer has proposed to completely change, and in my opinion ruin, the existence that the residents of Venice have fought for and enacted in law through zoning rules, over the years. I have many other points to make that don&€™t fall into the environmental area and we will fight this project in the courts as well as your domain to make sure that this illegal land swap, attempt to ruin Venice for profit, and hidden taxpayer liabilities does not come to pass.

Respectfully submitted,

Ira Koslow
35 year resident of Venice
25 year homeowner at 33 Park Avenue

CC: <miscikow@council.lacity.org>

From: "Carmel" <carmel_beaumont@comcast.net>
To: <JLIAO@planning.lacity.org>
Date: 4/25/04 3:06:02 PM
Subject: Sunset Ave. Project (Venice)

Mr. Liao,

I am Carmel Beaumont and I live on the corner of Vista Place (a walk-through street) and Royal Court, approx 100 ft. from Division 6 bus yard of the MTA. I would like the following comments to go on record as I feel these items need to be taken into consideration during the study that will generate the EIR on the Sunset Avenue Project.

1. Royal Court, which runs north and south is a one lane (two-way) ALLEY that dead ends at Thornton Place. According to the preliminary plan it appears that there will be an entrance or an egress on Thornton. It would seem that this could potentially push an additional 650 cars through this alleyway to gain access or to leave the projected parking garage in any given day. Royal Court is approximately 10 (ten) feet wide and the times there are two cars coming in opposite directions the only way for one to get around the other is for one or both cars to back up and pull as close to one of the buildings on either side and let the other person through. Although this is a two-way alley, there is only room for one car at a time to pass.

2. There is BARELY enough room for any emergency vehicles to get into this neighborhood as it is and using Thornton/Royal Court alleys for regular traffic would all but eliminate access for emergency vehicles into this area. As the neighborhood is virtually alleys and walk-through streets, this creates a hazardous situation for those of us that live here. Emergency vehicle access could only be from Main or Pacific for ALL of the homes bound by Brooks to the south and Thornton to the North and between Main and Pacific.

3. On trash day, the alley would be completely blocked while the trash truck is picking up and could potentially create a long line of cars backing all the way to Main Street.

4. The limited parking that the residents on the walk-through streets have is only accessible from Royal Court and sometimes it's a matter of arriving from the north or the south that makes it possible to get into some of the small spaces. Most of us already have to back into another's parking space to get in and out.
5. This area is similar to an island with only the alleyways to get to Main St. or Brooks. Main St. from Thornton is a blind right or left hand turn and already very dangerous as is the blind turn onto Brooks from Royal Court.

6. The alley infrastructure itself is in such sad shape that it will only continue to deteriorate with any more added cars coming using that alley.

7. Due to the narrow width of the alley when two cars are trying to get around each other, they have the potential to pull so close to our houses that they in fact have hit them or the fences that surround them. I used to have a fireplace till a taxi took out the chimney.

8. I think in general the density of the project is too high.

9. I also am opposed to the height variance that they are going to seek as the proposed height will block the sun from a lot of the residences here in this area.

Thank you for hearing my concerns.

CBeaumont

ive

From: <Gailee33@aol.com>
To: <JLIAO@planning.lacity.org>
Date: 4/25/04 1:05:51 PM
Subject: Sunset Avenue Project Venice

I AM TOTALLY OPPOSED TO THE CONSTRUCTION OF 225 RESIDENTIAL CONDOMINIUMS.

Aesthetics: I have lived in this architecturally delightful, walk-streeted, vintage California bungalowed community for over thirty years. The bus yard does not bother me. I do not even notice it. Five-storied condos would be an eyesore to me.

Geology/Soils: Before the bus yard was constructed, there was a railroad on that property. Who knows what toxic waste lies beneath the yard?

Transportation/Traffic: With Playa Vista now to the south of us, it is already too congested along Pacific Avenue. Beginning on Friday evening until Sunday, we have bumper to bumper traffic along Pacific and it isn't even the summer yet.

Land Use/Planning: A gated community? I find this offensive. We don't want people who need to live behind gates moving into our tight-knit, beloved community.

Respectfully submitted,
Gail Rogers

From: Naomi Glauberman <naomiglmn@comcast.net>
To: <jliao@planning.lacity.org>
Date: 4/23/04 5:17:57 PM
Subject: 100 E. Sunset Avenue Project, Venice

Dear Jimmy Liao,

My first response on learning that MTA terminal was to be transformed into both residential housing and retail shops was that that could only be a good thing.
I have lived blocks from the site since 1976, and although I cannot say I've ever been bothered by the comings and goings of busses, I certainly didn't consider the site to be much of a visual asset to the community. Surely housing would be an improvement.

But, the more I learn about the project, the more it seems to be inimical to the very nature of Venice.

As proposed, the density and height of the project are completely untenable. The parking and traffic problems that it would create in an area where parking is currently close to non-existent and traffic slows to a standstill on weekends would be a serious problem.

It also appears that this project would essentially be closed off from the surrounding community. This is untenable. The site is so large, it seems that it offers itself to become an integral part of the existing grid--the walk streets could continue through the site from Pacific to Main--the density would be greatly reduced, and the development, while preserving the existing cityscape would have the potential for linking Venice's past with its future.

For years Venice residents have fought to both maintain the historic character of our community and to provide access to the beach for all residents of the city. An enclosed development, two blocks from the water's edge would be in defiance of these values.

Although I could think of many excellent uses for the site if the bus terminal were to be removed--this project is certainly not one of them. I'm sure the Environmental Impact Report will list many compelling arguments against this development, let me just add that it is in clear violation of the Venice Plan that residents worked on for decades.

Thank you very much for your consideration.

Sincerely,

Naomi Glauberman
32 Breeze Avenue
Venice, Ca. 90291
(310-396-1380)

April 26, 2004

Jimmy C. Liao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, CA 90012

RE: ENF NO: ENV-2004-1407
PROJECT NAME: Sunset Ave. Project (Venice)

Concerning our building at 37 Park Ave, Venice

Concerning the above environmental study we have certain reservations concerning the planned installation in the former MTA parking lot.
We have always been appraised of the need for more parking spaces in the MTA area when it becomes available. The parking is so critical in the Venice area that many apartments have been rented without parking facilities.
The planned installation does nothing to improve the congestion in the area in fact it will adversely affect the parking environment with the high congestion of Condos!
This is absolutely not necessary for the Venice Area and should not be approved in its present form.
The people in the Venice area near the beach have been promised public parking in the MTA evacuated area for years. Who needs more congestion to an already overly congested area with very limited parking for visitors, repair services and emergencies.
This is not an improvement for the Venice area in its present form. As a compromise the number of Condos should be reduced by 50%. The parking should be increased and allocated as a reasonable percentage for the local residents use, at reasonable prices or no charge at all for those in close proximity the new installation.

Sincerely,
Walter Sterling
4178 Rhodes Way
Oceanside, CA 92056

Sunset Avenue Project
Scoping Meeting
Wednesday, April 7, 2004

Written Comment Form

The purpose of the public scoping meeting is to identify the range of actions, alternatives, and significant effects to be analyzed in the Draft EIR for the Sunset Avenue Project. The Project proposes the redevelopment of the Division 6 Bus Depot (Venice) into a mixed-use residential and commercial development.

Comments can be provided verbally at the scoping meeting or in written form. The City of Los Angeles Department of Planning should receive written comments by April 26, 2004. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed project. Your comments will then be considered during preparation of the Draft EIR.

Are you speaking tonight? ___ *Yes* ___ *No*

I live 40 yards from this proposed project & I enter & exit from an alley named Royal Court which feeds all three walk streets & exits & enters from BROOKS & THORNTON - THORNTON PL. would cause the residents of the 3 walk streets to be unable to enter & exit with the increase of an exit & EXIT on THORNTON for this project.
THE lack of appropriate parking & the density & height are true concerns - there is no way this 8 acre site can become such a mass.
The commercial site would bring yet another problem.
In summation, I appose the ingress - egress from thornton Pl. which is an extension of Royal Ct. I also oppose the DENSITY & HEIGHT & PARKING.

Name SUNNY TOMBLIN
Address 109 VISTA PLACE — OWNER SINCE 1976.
VENICE, CA 90291 - MY PROPERTY IS 4 UNITS & I SPEAK FOR ALL.

Please leave this form in the box provided or deliver, mail or fax it to Mr. Jimmy Liao, Project Coordinator, City of Los Angeles Department of Planning, 200 N. Spring Street, Room 763, Los Angeles, CA 90012. Fax (213) 978-1343. This form can simply be folded and placed in a mailbox. Please remember to add postage. You may also provide written comments by e-mail at jliao@planning.lacity.org. When sending comments, please provide your address so that you may receive public notices regarding this project.

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I. INTRODUCTION

This document is an Initial Study regarding the Sunset Avenue Project, which is being proposed by RAD Management LLC in cooperation with the Los Angeles County's Metropolitan Transportation Authority (MTA) and the City of Los Angeles. This Initial Study has been prepared pursuant to Section 15063 of the California Environmental Quality Act and its purpose is to focus the scope of inquiry to be addressed in an Environmental Impact Report (EIR) that is being prepared regarding this project.

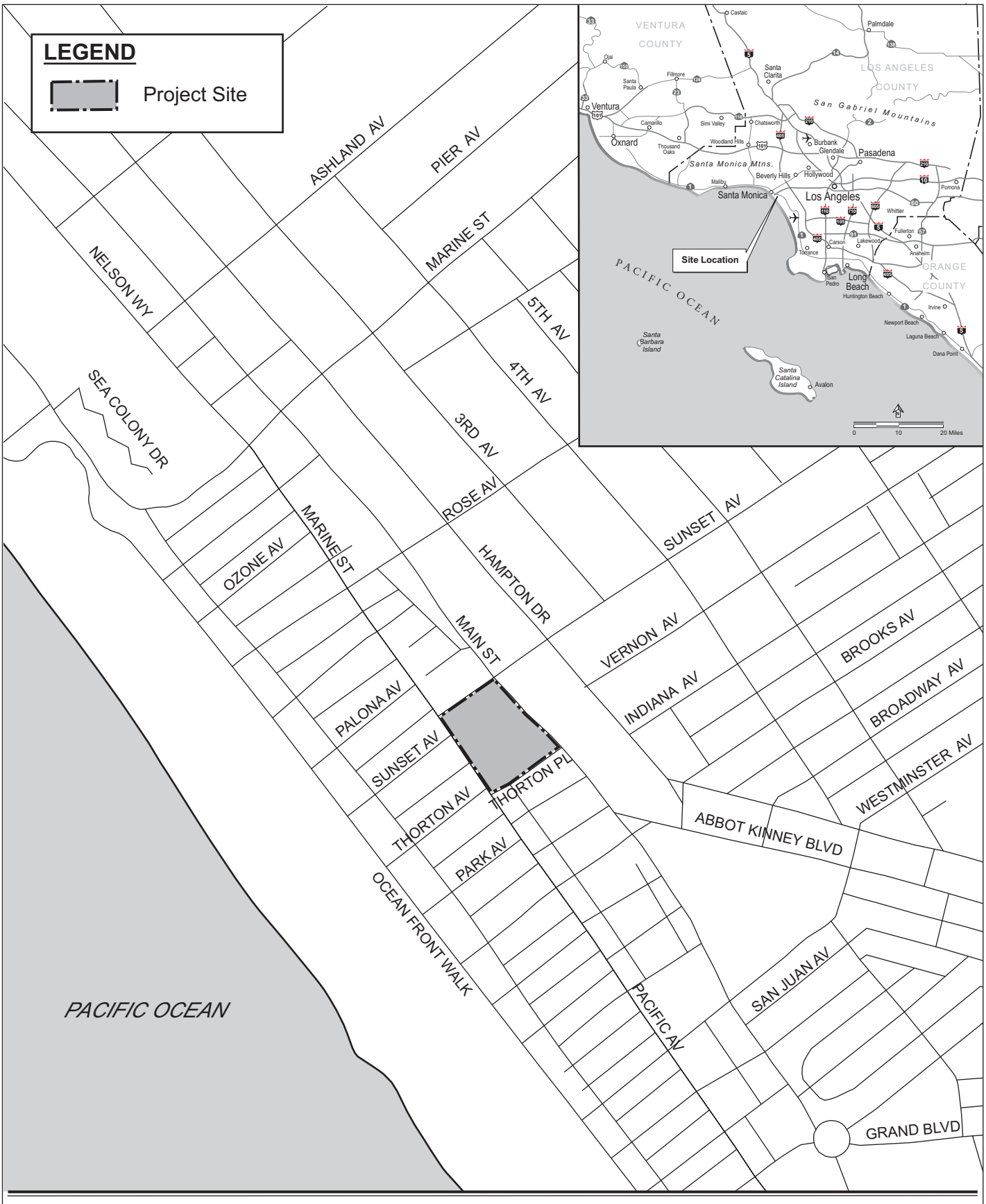
In addition to discussion of the closure of MTA's existing Division 6 Bus Maintenance Facility and its redevelopment as a mixed-use residential and commercial development, the EIR will address the MTA's new West Los Angeles Transportation Center. The scope of inquiry regarding the development of the West Los Angeles Transportation Center is being recommended in a separate Initial Study regarding that property. For purposes of this Initial Study for the Sunset Avenue Project, MTA and the City of Los Angeles are sharing Co-Lead Agency status regarding redevelopment of the Division 6 facility in Venice, while MTA is the property owner, the City is the decisionmaker regarding all entitlement actions for subsequent use.

II. PROJECT DESCRIPTION

The project site is located at 100 East Sunset Avenue in the Venice Community of the City of Los Angeles. It occupies an entire city block and is bordered by Pacific Avenue to the west, Main Street to the east, Sunset Avenue to the north, and Thornton Place to the south. As indicated on Figure 1, the site is located approximately 0.3 mile south of the City of Los Angeles/City of Santa Monica boundary, 1.1 miles north of Los Angeles County's Marina del Rey small craft harbor, and 0.25 mile east of the Pacific Ocean. Following the completion of the Los Angeles County Metropolitan Transportation Authority's (MTA) new West Los Angeles Transportation Center, to be located on Jefferson Boulevard between Rodeo Road and National Boulevard, the existing Division 6 Bus Depot, which presently occupies the project site, would be permanently vacated by the MTA. The existing structures, consisting of approximately 15,300 square feet of floor area, would be removed and any contamination associated with the site's previous use remediated.

The Sunset Avenue Project would displace the existing bus depot and maintenance yard with a development that is largely residential but would also include some neighborhood retail space. The proposed project would include an affordable housing component, which would permit a density bonus of 25 percent over the 171 dwelling units currently allowed. The project may also pursue an additional density bonus of 10 percent for development within the Coastal Zone and adjoining a designated transportation corridor. With both density provisions, a total of 231 units could be developed on site. However, the total number of residential units to be developed would be determined by final design, but would not exceed 225 dwelling units. In addition, approximately 10,000 square feet of retail space is proposed in a ground floor setting to be occupied by café and retail uses, though up to 7,000 square feet may house a health club.

As depicted in a conceptual site plan presented in Figure 2, several buildings are contemplated with a combination of community courtyards and private spaces in between. The residential structures along the Main Street and Pacific Avenue frontages are proposed with building heights of 35 feet, with varied rooflines above those streets, respectively, while the more central structures are proposed to be approximately 45 to 50 feet in height. Each of the residential structures would be constructed over two levels of subterranean parking with capacity for 650 vehicles. Parking capacity will comply with Los Angeles Municipal Code requirements for residential and retail uses. Residential access is proposed from Sunset Avenue, while access for retail patrons and delivery vehicles is proposed from either Main Street or Thornton Place. Roadway dedications along both Sunset Avenue and Main Street or Thornton Place are proposed to accommodate the project's proposed access points. The architectural character of the proposed improvements is still under development.



Source: PCR Services Corporation, 2004

Figure 1
Sunset Avenue Project
Project Vicinity Map

PCR

1" = 60' Feet
Scale In Approximate Feet

Source: Koning Eizenberg Architecture, 2004

Figure 2
Sunset Avenue
Conceptual Site Plan

PCR

Figure 3
Sunset Avenue
Conceptual Site Rendering

KoningEizenberg Architecture

III. ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** 100 East Sunset Avenue Project

2. **Lead agency name and address:** City of Los Angeles – Department of City Planning

3. **Contact person and phone number:** Jimmy Liao, Project Coordinator (213) 978-1331

4. **Project location:** The Project site is located at 100 East Sunset Avenue in the Venice Community of Los Angeles. The site is adjacent to Pacific Avenue to the west, Sunset Avenue to the north, Main Street to the east, and Thornton Place to the south

5. **Project sponsor's name and address:** RAD Management LLC
   615 Hampton Drive, Suite A108
   Venice, CA 90291

6. **General Plan Designation:** Venice Community

7. **Zoning:** M1 – Limited Industrial

8. **Description of project:** *(Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)*

   The project site is located at 100 East Sunset Avenue in the Venice Community of the City of Los Angeles. Following the completion of the Los Angeles County Metropolitan Transportation Authority's (MTA) new West Los Angeles Transportation Center to be located on Jefferson Boulevard between Rodeo Road and National Boulevard, the existing Division 6 Bus Depot, which presently occupies the project site, would be permanently vacated by the MTA. The existing structures, consisting of approximately 15,300 square feet of floor area, would be removed and any contamination associated with the site's previous use remediated. The project proposes to displace the existing bus depot would be developed for largely residential and some retail uses. The proposed project would include an affordable housing component, which would permit a density bonus of 25 percent over the 171 dwelling units currently allowed. The project may also pursue an additional density bonus of 10 percent for development within the Coastal Zone and adjoining a designated transportation corridor. With both density provisions, a total of 231 units could be developed on site. However, the total number of residential units to be developed would be determined by final design, but would not exceed 225 dwelling units. In addition, approximately 10,000 square feet of retail space is proposed in a ground floor setting to be occupied by café and

retail uses, though up to 7,000 square feet may house a health club. Included in the project, are two levels of subterranean parking for 650 vehicles. Residential access is proposed from Sunset Avenue, while access for retail patrons and delivery vehicles is proposed from either Main Street or Thornton Place. Roadway dedications along both Sunset Avenue and Main Street or Thornton Place are also proposed to accommodate the project's access points. Necessary entitlements include a Tentative Tract Map (condominium), Zone Change from M1 to CM, Specific Plan Exception for height, a Coastal Development Permit, a Specific Plan Project Permit, and any other discretionary actions as may be determined necessary.

9. Surrounding land uses and setting: *Briefly describe the project's surroundings:*

The 3.13-acre site is located on the east side of Pacific Avenue between Sunset Avenue and Thornton Place in a predominately residential area. Surrounding land uses include residential uses to the north, south, and west with parking and residential uses to the east.

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

City of Los Angeles Planning Department: (1) Zone Change , (2) Specific Plan Exception for height, and (3) Specific Plan Project Permit; California Coastal Commision: Coastal Development Permit

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

Preliminary assessment of all of the environmental factors listed in the Environmental Checklist here following indicate that aspects of those broad categories checked below could result in a potentially significant impact and, therefore, should be analyzed in an Environmental Impact Report to determine if the project would result in a potentially significant impact.

• Aesthetics	☐ Agriculture Resources	• Air Quality
☐ Biological Resources	• Cultural Resources	• Geology/Soils
• Hazards/Hazardous Materials	☐ Hydrology/Water Quality	• Land Use/Planning
☐ Mineral Resources	• Noise	☐ Population/Housing
☐ Public Services	☐ Recreation	• Transportation/Traffic
• Utilities/Service Systems	• Mandatory Findings of Significance	

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Signature	Date
Printed Name	For

PRELIMINARY EVALUATION OF POTENTIAL ENVIRONMENTAL IMPACTS:

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	•
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	•
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	• [1]	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	• [1]	☐	☐	☐
II. AGRICULTURE RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	•
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	•
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	•
III. AIR QUALITY– Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	•	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	• [1]	☐	☐	☐

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	● [1]	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	● [1]	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	●	☐
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	●
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	●
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	●
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	☐	☐	☐	●
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	●
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	●

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	• [1]	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	•
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	•	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	•	☐	☐
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	•
ii) Strong seismic ground shaking?	☐	•	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	•	☐	☐
iv) Landslides?	☐	☐	☐	•
b) Result in substantial soil erosion or the loss of topsoil?	☐	•	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	•	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	•	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	•
VII. HAZARDS AND HAZARDOUS MATERIALS –				

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	• [1]	☐	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	• [1]	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	• [1]	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	• [1]	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	•
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	•
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	•
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	•
VIII. HYDROLOGY AND WATER QUALITY– Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	•	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	•

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	•	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	•	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	•	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	•
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	•
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	•
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	•
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	•	☐
IX. LAND USE AND PLANNING– Would the project:				
a) Physically divide an established community?	☐	☐	☐	•
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	• [1]	☐	☐	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	•

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	•
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	•
XI. NOISE– Would the project result in:				
a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	• [1]	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	• [1]	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	• [1]	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	• [1]	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	•	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	•
XII. POPULATION AND HOUSING– Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	•	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	•
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	•

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	•	☐
Police protection?	☐	☐	•	☐
Schools?	☐	☐	•	☐
Parks?	☐	☐	•	☐
Other public facilities?	☐	☐	•	☐
XIV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	•	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	•	☐
XV. TRANSPORTATION/TRAFFIC – Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	• [1]	☐	☐	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	• [1]	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	•
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	•	☐	☐

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Result in inadequate emergency access?	☐	☐	☐	•
f) Result in inadequate parking capacity?	☐	•	☐	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	•
XVI. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	• [1]	☐	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	• [1]	☐	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	•	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	• [1]	☐	☐	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	• [1]	☐	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	•	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	•

Issues:	Potentially Significant Impact[1]	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	•	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	• [1]	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	• [1]	☐	☐	☐

IV. EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS. *Would the project:*

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

No Impact. The project site is located in the northwest quadrant of the Venice Community of the City of Los Angeles and is one-quarter mile east of the Pacific Ocean. Due to the project area's predominately flat topography, lack of natural features (i.e., trees or rock outcroppings), and highly urbanized land uses, views of the Pacific Ocean are considered to be the only scenic vista in the area.

The project site is surrounded to the north, south, and west by single- and multi-family homes in a mix of one to three story structures. On the east side of the project site is a parking lot and a two-story complex, which is currently under construction. Presently, due to the dense urban surroundings, scenic vistas of the Pacific Ocean are not visible from the existing residences. Hence, redevelopment of the project site as a residential complex with commercial uses would not block or otherwise adversely affect scenic views. Therefore, this issue does not require further analysis and no mitigation measures are required.

b.) Substantially damage scenic resources, including, but not limited to, trees, rock outcrops, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

No Impact. The existing site is paved and surrounded by chain-link fencing. Planted pine trees are located on the south, north, and eastern edges of the site. Historically, the site has been used as a transportation center since 1901 and has been altered several times over the last century. All historic buildings associated with the site's original use as a train yard for the Los Angeles Pacific Company, were demolished when the site was converted over to a motor coach yard in the 1950s. Additionally, according to the Transportation Element of the City of Los Angeles General Plan,[1] the four adjacent roadways are not designated as scenic highways. Therefore, the project would not have an adverse impact on historic buildings or designated scenic highways. No further analysis of this issue is required and mitigation measures are not recommended.

[1] *City of Los Angeles Planning Department, General Plan Transportation Element, Scenic Highways Map, 1998.*

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

Potentially Significant Impact. The existing Division 6 Bus Depot consists primarily of paved surfaces for the maintenance and storage of 54 buses and parking for 80 employees, staff, and visitors. The site is surrounded by a chain link fence, where most portions are covered in an opaque plastic to shield on-site activities. The project would remove the existing bus depot and replace it with a mixed-use residential and commercial development. The site would have landscaping and would consist of several buildings ranging from 35 feet to 50 feet in height. Replacement of the bus depot with the proposed project would result in significant changes to the visual character of the site and its surroundings, hence, this issue will be further analyzed of in an Environmental Impact Report (EIR) with mitigation incorporated, as necessary.

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

Potentially Significant Impact. The project proposes to have non-obtrusive, foot-traffic guidance lighting only for the project site. Since all parking would be subterranean, light and glare from security and nighttime lighting would have little effect on the surrounding area. Consequently, the pole-mounted lighting presently used at the existing bus depot would be removed, hence, eliminating a source of substantial light in the nighttime hours. However, the project proposes to construct several buildings, some of which would reach 50 feet in height. Therefore, as the project may result in creation of new sources of light and glare, this issue will be further analyzed in an EIR, with mitigation incorporated, as necessary.

II. AGRICULTURAL RESOURCES. *Would the project:*

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

AND

b.) Conflict with existing zoning for agricultural use, or Williamson Act contract?

AND

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

No Impact (a, b, & c). According to the Farmland Mapping and Monitoring Program, the project site is not mapped as prime or unique farmland.[2] Additionally, the site is zoned M1 – Limited Manufacturing by the City of Los Angeles, hence, agricultural uses are not permitted under this zoning designation. Consequently, there are no agricultural uses in the project vicinity; therefore, the project would not conflict with agricultural zoning or the Williamson Act. This issue does not require further analysis and no mitigation measures are necessary.

III. AIR QUALITY. *Would the project:*

a.) Conflict with or obstruct implementation of the South Coast Air Quality Management District (SCAQMD) Plan or Congestion Management Plan?

Less Than Significant With Mitigation Incorporated. As the project could result in increases in air emissions from construction, vehicle trips, and stationary sources, it could potentially affect implementation of the Air Quality Management Plan (AQMP). However, there is potential for the project to result in a beneficial affect on localized air quality through the removal of the bus depot and the diesel powered buses. In order to understand the potential adverse construction impacts or potential beneficial operation impacts of the project, these issues will be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. The project site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and Federal air quality standards are often exceeded in many parts of the Basin, with Los Angeles County among the highest of the counties that compose the Basin in terms of non-attainment of the standards. As the project could result in increased air emissions associated with construction and operation, this issue will be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

[2] *California Department of Conservation, Division of Land Resource Division, 2002.*

c.) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is in non-attainment (ozone, carbon monoxide, and PM_{10}) under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. Since the project could result in increases in air emissions from construction, vehicle trips, and stationary sources in a Basin that is currently in non-attainment for O_3 and PM_{10} based on Federal and State air quality standards, this issue will be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

d.) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors in the project vicinity consist primarily of single- and multi-family residences located on north, west, and south of the project site. There is potential that construction and/or operation of the project could increase pollutant concentrations. Therefore, this issue will be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

Less Than Significant Impact. 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. Objectionable odors are also associated with such uses as sewage treatment facilities and landfills. Activities and materials associated with construction of the project would be typical of construction projects of similar type and size. Limited odors could be generated by on-site waste and storage, as well as the use of certain cleaning agents and landscaping activities. Some odors that may be generated during construction or operation of the project would be localized and temporary in nature, and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. During the operational phase of the project, the proposed café may produce odors associated with food preparation, however it is not anticipated that these odors would be overwhelming, in a negative sense, as to be objectionable. Thus, impacts associated with the creation of objectionable odors would be less than significant. Further analysis of this issue is not required and no mitigation measures would be required.

IV. BIOLOGICAL RESOURCES. *Would the project:*

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

No Impact. According to a search of the California Department of Fish and Game's Natural Diversity Database (CNDDB), there are species designated as candidate and sensitive status within one-mile radius of the project site. However, as the site has historically been a train and a bus maintenance yard for over a century, the potential for endangered or candidate species to be present in the project area is remote. Additionally, the site's limited existing vegetation is non-native and consists primarily of pine trees. Removal of these trees and the other landscaping would have no adverse effect on sensitive or candidate species, as defined by CDFG or U.S. Fish and Wildlife Service. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. The project site is located within the Venice Coastal Zone Specific Plan area. The Specific Plan has no identified riparian habitat or sensitive natural communities, nor are such resources identified in another City or regional plan addressing the project area. Therefore, the site would have no adverse effect on riparian or sensitive natural community habitats. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. The project site has been a transportation facility since 1901; hence the natural landscape was altered over a century ago. Additionally, the highly urbanized project area consists primarily of residential and commercial land uses. No wetlands as defined by Section 404 of the Clean Water Act, exist near or on-site. Therefore, the project would not be in violation of Section 404 guidelines. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. Due to the highly urbanized nature of the project area, there are no known wildlife corridors or nearby habitats that may be sought by wildlife in passage or migration. Additionally, there are no natural areas or wildlife nursery sites within a one-square mile of the project site. No further analysis of this issue is required and no mitigation measures are necessary.

e.) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

No Impact. The City of Los Angeles has established an Oak Tree Ordinance that regulates the removal and replacement of oak trees. The only trees present on the project site are pine trees that have been planted for landscaping and as a buffer between the public sidewalks and the existing bus depot's chain link fencing. Therefore, their removal as part of the project would have no adverse effect on biological resources. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. The City of Los Angeles General Plan and the Venice Coastal Zone Specific Plan do not have designated habitat conservation or natural community conservation plans for the project area. No further analysis of this issue is required and no mitigation measures are necessary.

V. CULTURAL RESOURCES. *Would the project:*

a.) Cause a substantial adverse change in significance of a historical resource as defined in State CEQA § 15064.5?

Potentially Significant Impact. According to the South Central Coastal Information Center, 17 properties located within one half mile of the project are designated as listed,

evaluated, or appear to be eligible for listing as historic resources.[3] The California Register of Historical Resources and the City of Los Angeles Historic-Cultural Monument, have each identified one listed property. The remaining 15 properties appear on the California Historic Resources Inventory list, three of which appear eligible for listing on the National Register. However, there are no historic resources present on the project site, nor are the historic resources cited above within proximity of the project site that the project could result in an adverse effect on those resources. Therefore, no further analysis of this issue is recommended and no mitigation is necessary.

Although the project site has a history dating back to 1901, all of the original buildings, associated with the Los Angeles Pacific Company, have been removed. The bus depot, which dates back to 1950, is not registered as a historic resource at either the national, state, or city level. However, there is a mural located on the west-facing wall that is part of the automated bus washer located adjacent to Pacific Avenue. The mural is titled, "You Are Not Forgotten" and was painted in 1992 by Peter Stewart. It is a memorial for the soldiers of the Vietnam War that have been classified as Missing in Action (MIA) or Prisoners of War (POW). Included on the wall are 2,273 names of soldiers unaccounted for in Southeast Asia. The project was done in part to raise funds for the Vietnam Veterans Aid Foundation.

Murals are an integral component of cultural expression within the City of Los Angeles. The Public Art Division of the Cultural Affairs Department oversees the extensive Mural Program that includes the permitting, preservation, and conservation of murals throughout the city. The Department also maintains a database of all permitted murals. Although the mural on the project site has not been identified as a City of Los Angeles Historic-Cultural Monument, it should be given special consideration in the local planning process. The United States Congress and California legislature have enacted laws (Visual Artists Rights Act, 17 USC Sections 101 et seq. and the California Art Preservation Act, Civil Code Sections 987 et seq. respectfully), which provide limited protections to murals that fall within their provisions. In certain circumstances, these laws require that property owners provide appropriate notice to artists of the intent to alter, remove, or destroy murals. Therefore, in light of relevant federal, state, and local laws and regulations the mural should be looked upon as a historic resource for the purposes of CEQA compliance. Therefore, further evaluation in an environmental impact report is recommended, particularly for the purposes of exploring the potential of various measures, which may mitigate the impact of direct mural removal.

[3] *South Central Coastal Information Center-California State University, Fullerton – March 10, 2004.*

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

No Impact. No archaeological sites or isolates are located within the project site. One archaeological site has been identified within a one half-mile radius of the project site; however, this site is not listed on the Archaeological Determination of Eligibility (DOE) list. Therefore, the project would not result in a substantial adverse change to an archaeological resource. No further analysis of this issue is required and no mitigation measures are necessary.

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

Less Than Significant With Mitigation Incorporated. The paleontological sensitivity of the proposed project area is considered to be of high potential.[4] The uppermost few feet of soil in the proposed project area are unlikely to contain significant fossil remains, especially if they have been disturbed by prior construction activities. At depth, however, there is potential to encounter significant vertebrate fossils, as nearby localities have produced such resources at depths as shallow as six feet. Given this understanding, which further research cannot advance, further investigation in an environmental impact report is not required. However, mitigation is considered necessary.

Mitigation V.c.1.: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less than significant levels.

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

Less Than Significant With Mitigation Incorporated. The discovery of human remains from recent, historic or prehistoric periods on any property not already identified in association with such remains is remote. The project site and the immediate surroundings are not already identified with previous accidental discoveries of human remains. Nevertheless, accidental discovery does occur. Therefore, while such discovery is highly unlikely, and further

[4] *Natural History Museum of Los Angeles County, Vertebrate Paleontology Section, March 2004.*

evaluation in an environmental impact report is inappropriate, precautionary mitigation is necessary.

Mitigation V.d.1: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). .With implementation of this measure, potential project impacts in this category would be reduced to less than significant levels.

VI. GEOLOGY AND SOILS. *Would the project:*

a.) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

No Impact. According to the California Geologic Survey, the proposed project is not located on or within a delineated rupture zone as defined by Alquist-Priolo Earthquake Fault Zoning Map series.[5] Hence, the project would not expose people or structures to substantial risk from rupture of a delineated earthquake fault zone. No further analysis of this issue is required and no mitigation measures are necessary.

(ii) Strong seismic ground shaking?

Less Than Significant With Mitigation Incorporated. Active and non-active faults exist within the general vicinity of the project site. As mapped by the Southern California Earthquake Data Center, 31 faults are located within a 50-mile radius of the site.[6] Any of these faults could produce seismic ground shaking that may affect the project site. Therefore, this

[5] *California Department of Conservation, California Geologic Survey, Digital Database of Faults from the Fault Activity Map of California and Adjacent Areas, 1994.*

[6] *Geotechnical Engineering Study prepared by Advanced Geotechnical Services, Inc., February 2004.*

issue will be further analyzed in an EIR with appropriate mitigation measures incorporated, as necessary.

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

Less Than Significant With Mitigation Incorporated. Liquefaction is a seismically-induced phenomena that causes saturated soils to lose its shear strength resulting in the soils behaving like a viscous fluid. Sites susceptible to liquefaction generally exhibit four conditions: potential for seismic activity, cohesionless soils (e.g., sand and silt), groundwater within 50 feet below ground surface, and soil densities of less than 70 percent.[7] The Geotechnical Engineering Study indicates that the site's soil meet all four liquefaction conditions and is therefore susceptible to liquefaction.[8] Hence, this issue will be analyzed further in an EIR with appropriate mitigation measures to be incorporated, as necessary.

(iv) Landslides?

No Impact. The project site is not located within a delineated landslide area as defined by the California Geologic Survey.[9] Additionally, the site is relatively flat with a minimal rise in topography from north to south. The site is not at risk of adverse effects due to seismically induced landslides. No further analysis of this issue is required and no mitigation measures are necessary.

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

Less Than Significant With Mitigation Incorporated. Due to the liquefaction potential at the project site, contact between irrigation and precipitation percolation and the underlying soils needs to be limited to the greatest extent possible during construction and operation.[10] Erosion and saturation of the underlying soils could result in an adverse impact due to soil erosion. Therefore, this issue will be analyzed further in an EIR and appropriate mitigation measures be incorporated, as necessary.

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[7] *Geotechnical Engineering Study prepared by Advanced Geotechnical Services, Inc., February 2004..*

[8] *Ibid.*

[9] *State of California – Department of Conservation Seismic Hazard Mapping Program, Venice Quadrangle, 1999.*

[10] *Geotechnical Engineering Study prepared by Advanced Geotechnical Services, Inc., February 2004.*

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

Less Than Significant With Mitigation Incorporated. According to the Geotechnical Study, the project site has the potential for liquefaction as well as hydroconsolidation (i.e., collapse).[11] Both of these issues would require mitigation measure, hence, this issue will be further investigated in an EIR.

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

Less Than Significant Impact. Geotechnical consolidation tests of the soils underlying the project site have determined that these soils are potentially subject to liquefaction and hydroconsolidation. Neither soil condition is related to expansion. Therefore, the project would not be located on expansive soils as defined by Uniform Building Code. Further analysis of this issue is not required and no mitigation measures, specifically for expansive soils, are necessary.

e.) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Wastewater services for the project would be provided by the City of Los Angeles' Bureau of Sanitation. These services are already located in the project area and are supported by the area's soils. Neither septic tanks nor alternative wastewater disposal systems would be utilized for this project. No further analysis of this issue is required and no mitigation measures are necessary.

VII. HAZARDS AND HAZARDOUS MATERIALS. *Would the project:*

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

Potentially Significant Impact. According to the Phase I Environmental Site Assessment, the project site shows evidence of contaminated soils and groundwater, which

[11] *Geotechnical Engineering Study prepared by Advanced Geotechnical Services, Inc., February 2004.*

requires further Phase II investigation.[12] Remediation and disposal of contaminated materials would need to occur prior to project construction. These remediation efforts may require the transportation and off-site disposal of the site's contaminated soils and/or groundwater. Therefore, further investigation of this issue in an EIR is required with mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. Remediation and removal of the project site's hazardous materials and underground storage tanks have the potential to release hazardous materials into the environment. Further investigation of this issue in an EIR is required with mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. A public elementary school is located approximately 800 feet, or 0.15 miles southeast of the project site in the City of Los Angeles.[13] Therefore, this issue will be analyzed further in an EIR with mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. The project site is documented on the Cortese List (i.e., Government Code Section 65962.5) for a leaking underground storage tank (LUST).[14] The Phase I report has also identified soil and groundwater contamination that requires further investigation. Therefore, this issue will be analyzed further in an EIR with mitigation measures incorporated, as necessary.

[12] *Phase I Environmental Site Assessment prepared by MACTEC, March 2004.*

[13] *Thomas Brothers Guide for Los Angeles and Orange Counties, 2004.*

[14] *Phase I Environmental Site Assessment prepared by MACTEC, March 2004.*

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

No Impact. The project site is located approximately 1.6 miles southwest of the Santa Monica Municipal Airport. The airport is limited to small aircraft and helicopter uses that can meet the established noise threshold as established by the City of Santa Monica.[15] The project vicinity is highly urbanized and generally developed with residential and commercial/retail uses that are unaffected by the airport on a daily basis. Therefore, although the site is located within two miles of the Santa Monica Municipal Airport, it is not anticipated to result in a safety hazard to people residing or working in the project area. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. The project site is not located within the vicinity of a private airstrip; hence, it would not result in an aircraft or airport-related safety hazard for people residing or working in the project area. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. Residential access is proposed from Sunset Avenue, while access for retail patrons and delivery vehicles is proposed from either Main Street or Thornton Place. Under the construction phase of the project, temporary lane closures may occur along these streets. It is not anticipated that full street closure would be necessary under the construction phase of the project. However, these roadways may experience an increase in large truck volumes and trips during site demolition, land clearing, and excavation/hauling of materials. According to the City of Los Angeles Safety Element, none of these roadways are designated as a selected disaster route.[16] Because the project would not result in any closures of designated emergency routes, it would be

[15] *City of Santa Monica Municipal Code, Article 10: Airport and Harbor Regulation, http://pen.ci.santa-monica.ca.us/municode/codemaster/Article_10/04/index.html.*

[16] *City of Los Angeles Planning Department General Plan Framework, Safety Element – Critical Facilities & Lifeline Systems Map, 1995.*

consistent with emergency response/evacuation plans developed by the City of Los Angeles. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. Situated in a heavily urbanized area of Los Angeles, the project site is not located near designated wildlands. Therefore, the project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No further analysis of this issue is required and no mitigation measures are necessary.

VIII. HYDROLOGY AND WATER QUALITY. *Would the project:*

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

Less Than Significant Impact. Project-related construction activities have the potential to affect surface water quality as the result of minor soil erosion (during grading and soil stockpiling), subsequent siltation, and conveyance of other pollutants into municipal storm drains during the project construction phase. In accordance with regulations set forth by the Los Angeles Regional Water Quality Control Board (RWQCB) and the City of Los Angeles, project construction activities would require a Notice of Intent to comply with the State Construction Activity General National Pollutants Discharge Elimination Systems (NPDES) Permit (Order No. 99-08-DWQ). As part of these requirements, preparation of a Storm Water Pollution Prevention Plan (SWPPP) would be required. The SWPPP would include BMPs and erosion control measures to reduce pollution in storm water discharge to levels that comply with applicable water quality standards.

In addition, project operations would comply with the City's Standard Urban Storm Water Management Plan (SUSMP) requirements. Under the SUSMP, the project would be required to ensure that post-development peak storm water runoff discharge rates would not exceed the estimated pre-development rates such that there would be an increased potential for downstream erosion. The SUSMP requirements also include, but are not limited to, the following: minimization of storm water pollutants of concern; provision of storm drain system stenciling and signage; provision of properly designed outdoor material storage areas; containing properly designed trash storage areas; and documentation of ongoing BMP maintenance. On-site parking facilities, to the extent applicable, would be required to treat runoff before it reaches the storm drain system.

As the proposed project would replace a transportation facility that has a high potential for storm water pollution, with a residential development that has a lower pollution potential, the operation of the project could have a beneficial impact on storm water quality. By adhering to the requirements of the NPDES permit and the SUSMP, water quality from the project site has the potential to be of higher quality than the existing conditions. Additionally, the project's parking is proposed as subterranean, which would remove the parking surfaces and other potential sources of contamination from exposure to storm water runoff, hence, enabling the project site to further reduce its potential for discharging polluted runoff. Therefore, no further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. The City of Los Angeles owns limited groundwater rights within four groundwater basins, including the San Fernando, Sylmar, Central, and West Coast Basins.[17] The project site is located over the West Coast Basin, which annually provides the City with 1,400 acre-feet of water. Recharge of the West Coast Basin occurs via subterranean flow from the Central Basin, which is actively recharged by spreading grounds.[18] Minimal amounts of recharge do occur via open spaces that allow for seepage of surface and irrigation waters into smaller unconfined aquifers within the Basin. Although groundwater resources do exist in the project vicinity, groundwater would not be used during construction of the project. During the project's operation phase, water would be provided via pipeline by the City of Los Angeles' Department of Water and Power. The project would not deplete groundwater supplies nor would it interfere with groundwater recharge. Therefore, no further analysis of this issue is required and no mitigation measures are necessary.

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

Less Than Significant Impact. Construction activities have the potential to result in limited soil erosion in the very early phases before site excavation has lowered site elevation

[17] *City of Los Angeles Department of Water and Power, http://www.ladwp.com/ladwp/cms/ladwp001371.jsp, 2004.*

[18] *State of California Department of Water Resources, http://www.dpla2.water.ca.gov/publications/groundwater/bulletin118/basins/4-11.03_West_Coast.pdf, 2004.*

below adjoining properties. However, project construction will comply with applicable provisions of the County's NPDES permit. Therefore, the project is not expected to have significant soil erosion impacts. Further analysis of this issue in an EIR is not required and mitigation measures are not necessary.

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

Less Than Significant Impact. The existing site is predominately impervious and the proposed project, which would also be predominately impervious, would not result in an increase in impervious surfaces. Additionally, the project would not alter the existing drainage patterns or increase the rate and amount of surface runoff from the site, and therefore, would not result in flooding either on-site or in the project locale. Hence, no further analysis of this issue is required and no mitigation measures are necessary.

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

Less Than Significant Impact. The proposed project would result in a predominately impervious surface that would be similar to the existing conditions. However, under existing conditions, the bus depot currently has several sources that have potential to contribute to polluted runoff (e.g., fueling station, bus washer, and parking lots). Therefore, by replacing the bus depot with the proposed project, it would remove the existing sources that may lead to polluted storm water runoff. Therefore, as the project would not increase storm water runoff it would not exceed the capacity of existing storm water systems nor would it construct additional sources that could contribute to polluted runoff. No further analysis of this issue is required and no mitigation measures are necessary.

f.) Otherwise substantially degrade water quality?

No Impact. Compliance with applicable State and local regulations regarding water quality during construction and subsequent operation of the project would assure that significant project impacts associated with polluted runoff would not occur. Polluted runoff would be treated through preparation of a SWPPP, in accordance with the Construction Activity General Permit (Order No. 99-08-DWQ), and SUSMP provisions during the operational life of the project. As such, it is anticipated that the project would not result in substantial additional

sources of polluted runoff and no significant impact would occur. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. According to the Federal Emergency Management Agency's (FEMA) Federal Insurance Rate Map Panel Number 0601370083D, the project site is designated as a Zone B flood zone area.[19] Zone B is defined as an area between the limits of a 100-year and 500-year flood zone. Hence, the project site is not located within a 100-year flood plain. Therefore, further analysis of this issue is required and no mitigation measures are necessary.

h.) Place within a 100-year flood plain structures, which would impede or redirect flood flows?

No Impact. The project site is not located within a FEMA designated 100-year flood plain. No further analysis of this issue is required and no mitigation measures are necessary.

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

No Impact. The project site is not located within a dam failure area as delineated on the Los Angeles County Inundation Hazard Area Map.[20] Therefore, the site is not at risk of inundation from flooding as a result of a dam failure. Further analysis of this issue is not required.

j.) Cause inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. The project site is designated as an area potentially located within the run-up zone of a large tsunami, as shown on the City of Los Angeles' Inundation and Tsunami Hazard Map.[21] However, the site has been in operation as a transportation facility for over 100 years without any incident of a tsunami.[22] Therefore, it is

[19] *Federal Emergency Management Agency FIRM Panel No. 0601370083D, 1980.*

[20] *County of Los Angeles, General Plan Safety Element, Inundation Hazard Area Map, 1993.*

[21] *Ibid*

[22] *Metropolitan Transportation Authority – Archives, 1901 to 1998.*

anticipated that the potential impact from a tsunami is remote. Further analysis of this issue is not required and no mitigation measures are necessary.

IX. LAND USE AND PLANNING. *Would the project:*

a.) Physically divide an established community?

No Impact. The project site is located within the Venice Community Plan area of the City of Los Angeles. Single- and multi-family residences are located north, west, and south of the project site, with a new multi-family development under construction to the east. The proposed project would replace the existing bus depot—which has become inconsistent with its surrounding land uses—with a residential development that would be more consistent with the established community. Therefore, the project would not modify or physically divide an established community, and no impacts would occur. Further analysis of this issue is not required and no mitigation measures are necessary.

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

Potentially Significant Impact. The project site is currently zoned M1-Limited Industrial Zone and the project would require a zone change to CM-Commercial Manufacturing. Additionally, as the project is changing the land use from a transportation facility to a multi-family residential use, several other permits and approvals will be required to implement the project. Therefore, this issue will be further analysis in an EIR with mitigation incorporated, as necessary.

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

No Impact. Neither the Los Angeles General Plan nor the Venice Coastal Specific Plan have adopted habitat or natural community conservation plans for the project area. Hence, construction and operation of the proposed project would not conflict with biological conservation plans. Therefore, no impacts would result. No further analysis of this issue is required.

X. MINERAL RESOURCES. *Would the project:*

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

No Impact. The project site is not listed as a potential or existing mineral resource extraction area for the State of California.[23] Additionally, the project site's land use, as defined by the City of Los Angeles General Plan or the Venice Community Plan, is not designated as a mineral extraction land use. As such, implementation of the project would not result in the loss or availability of a known mineral resource that would be of value to the region and the residents of the State and no impacts would occur. Further analysis of this issue is not required and no mitigation measures are necessary.

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

No Impact. The project site is not located within a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, implementation of the project would not result in a loss of any locally important mineral resources recovery sites and no impacts would occur. Further analysis of this issue is not required and no mitigation measures are necessary.

XI. NOISE. *Would the project result in:*

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

Potentially Significant Impact. The proposed project could result in an increase in noise levels associated with construction and/or operation of the project. Consequently, the project may result in a decrease in the operational noise associated with the site's existing use as a bus maintenance yard. Therefore, this issue will be analyzed further to address potential increases or decreases in noise in an EIR with feasible mitigation measures incorporated, as necessary.

[23] *California Department of Conservation, Division of Mines and Geology/U.S. Geologic Survey, Minerals Yearbook: The Mineral Industry of California, 2001.*

b.) Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Operation of the proposed project may result in the generation of groundborne vibration or groundborne noise. Therefore, this issue will be analyzed further in an EIR with mitigation measures incorporated, as necessary.

c.) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. The proposed project would involve the construction of several new buildings and the demolition of the existing facility. The potential for the project to cause a post-construction decrease in existing ambient noise levels attributed to the existing bus maintenance operations could exist. Therefore, the potential for a permanent decrease in noise levels will be analyzed further in an EIR.

d.) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. Construction related activities and equipment used during the project's construction phase could result in a temporary or periodic increase in ambient noise levels above those present without the project. Therefore, this issue will be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

Less Than Significant Impact. The project site is located within two miles of the Santa Monica Municipal Airport, which is a public use airport. Airplanes from the airport do pass over the project site at random intervals and do produce ambient short-term noise. Because the noise is random and short-term, it is not considered to be a source of excessive noise. Further analysis of this issue is not required and no mitigation measures are necessary.

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

No Impact. The proposed project is not within the vicinity of a private airstrip that would expose residents or employees of the project to excessive noise levels. No noise impacts would result. Further analysis of this issue is not required and no mitigation measures are necessary.

XII. POPULATION AND HOUSING. *Would the project:*

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

Less Than Significant Impact. The proposed project includes a 225 unit multi-family residential development that would introduce a new residential population to the Venice Community. Based on the density of the project and plan population and dwelling unit capacity factors provided in the Venice Community Plan, the proposed project would generate a residential population of approximately 457 persons at full buildout.[24] Based on SCAG population and housing data prepared for the census tracts within the Venice Community Plan area, for the year 2000 there was a residential population of 47,350 persons and 21,205 dwelling units.[25] A residential population of 54,744 persons and 23,841 dwelling units are projected for 2010.[26] Based on this data, the proposed project would represent less than one percent of SCAG's 2010 population and housing forecasts for the census tracts that comprise the Venice Community Plan. Thus, although the proposed project includes a General Plan amendment and zone change to permit residential development in an area previously zoned for Limited Industrial uses, the comparatively small additional residential population would not generate a substantial increase in population growth in the area. Furthermore, some of the residential units would expected to be occupied by people who are already present in the Community or nearby area, thus reducing the actual population growth that may be generated by the project.

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[24] *City of Los Angeles, Venice Community Plan, September 29, 2000, page III-3 and based on a High Medium Residential occupancy factor of 2.03 persons per dwelling unit.*

[25] *SCAG 2001 RTP data.*

[26] *2010 forecasts are based on SCAG RTP Projections, December 2003. Since population estimates for 2010 referenced in the Venice Community Plan were exceeded in 2002 based on the most recently available City data for the Venice Community Plan area, the analysis of population and housing is based on recent SCAG data for both 2000 and 2010. This data includes the census tracts that comprise the Community Plan area, although the census tract boundaries may encompass a greater area than the Venice Community Plan boundaries..*

Additionally, the project would generate a small number of employees associated with the proposed commercial uses. Based on the 10,000 square feet of commercial uses proposed (including a health club, retail, and café) approximately 27 employees would work onsite over several shifts. [27] This represents a reduction in the number of employees in comparison to the 144 workers associated with the current bus maintenance activities. It is expected that those who would be employed by the commercial uses would be drawn from the local area. Therefore, the project would not result in a substantial population growth either directly or indirectly. Further analysis of this issue is not required and no mitigation measures are necessary.

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

No Impact. There are no existing housing units within the project site. Therefore, implementation of the proposed project would not result in the displacement of any housing nor would it necessitate the construction of replacement housing. No impacts would occur. Further analysis of this issue is not required and no mitigation measures are necessary.

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

No Impact. Since there are no existing housing units within the project site, the project would not result in the displacement of people, nor would it necessitate the construction of replacement housing elsewhere. No impacts would occur. Further analysis of this issue is not required and no mitigation measures are necessary.

XIII. PUBLIC SERVICES. *Would the project:*

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

(1) Fire protection?

[27] *Based on data provided in the Institute of Transportation Engineers, Trip Generation 6th Edition.*

Less Than Significant Impact. Fire protection and emergency medical services are provided by the Los Angeles Fire Department (LAFD). The site is currently developed with a 15,300 sq. ft. bus maintenance facility. Two LAFD fire stations would continue to provide fire protection to the project site and the project vicinity in an emergency situation. Stations No. 63 is located at 1930 Shell Avenue, (approximately one mile from the project site) and Station No. 63 is located at 3631 Centinela Avenue (approximately 2.5 miles from the project site). Each station has an array of equipment to address various types of emergency situations as follows: Station No. 63 is a truck company with two engines units and a rescue unit and Station No. 62 is a single-engine company with a rescue unit, and swift water rescue. Station No. 63 is within the response distance for high density residential and commercial neighborhood uses of one and one half miles for an engine or truck company, as specified in Section 57.09.07 of the City of Los Angeles Fire Code. Additional fire protection is also available under an automatic aid agreement with the City of Santa Monica. The nearest fire station located in Santa Monica is at 222 Hollister Avenue, approximately one mile from the project site. Equipment and staffing at this facility include on engine company and one paramedic rescue squad. The site is not located in a high fire hazard area, as designated by the City of Los Angeles.

The proposed project would result in a change of land use from industrial uses to residential and some commercial uses. Although the intensity of uses within the site would be reduced, the proposed residential and commercial uses would result in an increase in residential and daytime population within the site when compared to current conditions. This increase in population within the project site, although not substantial, would incrementally increase the demand for fire protection services compared to current conditions. However, development of the proposed residential structures and commercial uses would comply with all applicable provisions of the City of Los Angeles Fire Code (Article 7 of the Los Angeles Municipal Code) to ensure that adequate LAFD access, hydrants, and fire flow requirements would be provided. Furthermore, the majority of project construction and staging would be confined to the site or a portion of one parking lane and therefore would not interfere with LAFD access to surrounding properties. Therefore, impacts on fire protection services would be less than significant. Further analysis of this issue is not required and no mitigation measures are necessary.

(2) Police protection?

Less Than Significant Impact. Police protection is currently provided to the project site and surrounding area by the City of Los Angeles Police Department (LAPD). The Pacific Community Police Station is located at 12312 Culver Boulevard, approximately 3.5 miles east of the project site. This station encompasses a service area of approximately 24 square miles and

includes a population of approximately 200,000 residents.[28] The station currently has 390 assigned sworn officers representing an officer to population ratio of 1.95 per 1,000 residents.[29]

The proposed project would result in an increase in onsite residential population and structures and a decrease in daytime (or employee) population compared to current conditions. The overall increase in population within the project site would incrementally increase the demand for police services when compared to current conditions. As described in Response XII.a., the total estimated occupancy of the project is approximately 457 residents and 27 employees. Given the size of the existing service population, full occupancy of the proposed project would not substantially reduce the officer to population ratio, nor would the limited additional demand substantially affect the provision of police services. The proposed project would include security features such as on-site security personnel, controlled access to residential parking and residential areas, security alarms for retail areas, and nighttime security lighting to reduce the demand for police protection. In addition, the majority of project construction and staging would be confined to the site or a portion of on parking lane and therefore would not interfere with LAPD access to surrounding properties. Therefore, impacts to police protection services would be less than significant. Further analysis of this issue is not required and no mitigation measures are necessary.

(3) Schools?

Less Than Significant Impact. Los Angeles Unified School District (LAUSD) provides public school services in the project area. The project site is located within Local District D of the LAUSD. Table B-1, Enrollment and Capacity of Project Related Schools, on page IV-25, identifies the nearest LAUSD schools to the project site. As shown on Table B-2, Potential School-Age Residents of Project, on page IV-26, and based on the LAUSD student generation rates for multi-family housing, approximately 93 school-age children would potentially be generated by the proposed project.

Based on the most recent student enrollment and capacity data available presented in Table B-1, capacity is available to accommodate these students. In addition, in accordance with State law, including Government Code Section 65995 and Education Code Section 17620, issuance of building permits for the proposed project would require the payment of fees at a specified rate for the funding of improvements and expansion of school facilities. In accordance with Senate Bill 50 (SB 50) enacted in 1998, payment of this fee is deemed to fully mitigate any

[28] *Los Angeles Police Department online information available at http://www.lapdonline.org/community/op_west_bureau/pacific_home_frame.htm, May 6, 2004.*

[29] *Michelle Gong, Management Assistant, LAPD West Bureau, telephone conversation, May 6, 2004.*

Table B-1

ENROLLMENT AND CAPACITY OF PROJECT RELATED SCHOOLS [a]

School	Operating Capacity: 2002-2003	Enrollment: 2002-2003	Unused Capacity
Westminster Elementary School	564	407	157
Mark Twain Middle School	1,688	1,382	306
Venice High School	3,235	2,535	700

[a] *School Accountability Report Card, School Information Branch, http://www.lausd.k12.ca.us/lausd/offices/icb/*

impact to school facilities. Therefore, with payment of the required fee, impacts to schools would be less than significant and no additional mitigation measures are required.

(4) Parks?

Less Than Significant Impact. The proposed project would introduce a new residential population into a neighborhood served by City, County, and State parks located in the immediate vicinity and throughout the region. The following parks and recreation facilities are within a one-mile radius of the project site: Venice Beach and Venice Recreation Center to the west, Westminster Senior Center to the southeast, and Oakwood Recreation Center to the east. As described in Response XII.a., the total estimated occupancy of the project is approximately 457 residents. While the project's residents would be expected to use existing recreation and park facilities in the surrounding area, the introduction of this relatively small population in comparison with the local and regional service population would not substantially affect park facilities. In addition, in accordance with Section 17.12 of the Los Angeles Municipal Code regarding subdivisions, the applicant would be required to dedicate land or pay in-lieu park fees for the development and acquisition of park and recreational sites that would serve residents of the proposed project. Therefore, the project would result in a less than significant impact on parks within the project vicinity. Further analysis of this issue is not required and no mitigation measures are necessary.

(5) Other public facilities?

Less Than Significant Impact. The proposed project would result in the generation of new housing units in the Venice Community. As described in Response No. XII.a., the total estimated occupancy of the project is approximately 457 residents. . As discussed above, the proposed project would represent less than one percent of SCAG's 2010 population and housing forecasts for the census tracts that comprise the Venice Community Plan. As a result of the small scale of the project and the minor increase in population, the need for new or altered public

Table B-2

POTENTIAL SCHOOL-AGE RESIDENTS OF PROJECT

Number of Dwelling Units Proposed	Employee Equivalent Dwelling Units[1]	Adjusted Project-Related Dwelling Units	School Level	Student Generation Rate per Dwelling Unit[2]	Potential Student Residents of Project
225	13	238	Elementary	0.2089	50
			Middle	0.0942	22
			Senior	0.0891	21
			TOTAL		***93***

[1] *The LAUSD School Fee Justification Study assumes that new commercial development indirectly generates potential school enrollment, based on the estimated number of dwelling units within the district associated with the new employees. For retail and services, the LAUSD assumes 1.2971 households per 1,000 square-feet of development.*

[2] *Generation factors are for multi-family attached housing.*

Source: School Fee Justification Studies for Los Angeles Unified School District, September 2002

facilities is considered to be remote. Further analysis of this issue is not required and no mitigation measures are necessary.

XIV. RECREATION. *Would the project:*

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

AND

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

Less Than Significant Impact. As described in Response XIII.a.(4), there are existing parks and recreational facilities within a one-mile radius of the site including Venice Beach and Venice Recreation Center, Westminster Senior Center, and Oakwood Recreation Center. These facilities, as well as other neighborhood and regional parks in the region, are expected to be used by residents of the proposed project. The relatively small population increase resulting from the proposed project, estimated at 457 residents at full occupancy, would not cause or accelerate substantial physical deterioration of any local or regional parks or recreational facilities. Park

use by employees and customers associated with the retail component of the proposed project is expected to be minimal. In addition, in accordance with Section 17.12 of the Los Angeles Municipal Code regarding subdivisions, the applicant would be required to dedicate land or pay in-lieu park fees for the development and acquisition of park and recreational sites that would serve residents of the proposed project. Therefore, the project would not substantially increase the use of existing neighborhood or regional parks or other recreational facilities. Further analysis of this issue is not required and no mitigation measures are necessary.

XV. TRANSPORTATION AND CIRCULATION. *Would the project:*

a.) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

AND

b.) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact. Construction of the project would result in a temporary increase in traffic associated with construction-related vehicles. Under operational conditions, the project would add the daily movement of residents and employees that would generate an increase in local vehicle trips on roadways within the project vicinity. Therefore, it is recommended that the potential for the project to cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system be analyzed, as well whether the project would exceed, either individually or cumulatively, a level of service standard established by MTA's Congestion Management Plan. The EIR shall recommend feasible mitigation measures, as appropriate.

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

No Impact. The project site is located within two miles of a public use airport; however, the project does not include an air transportation component. The project would have no adverse impact on air traffic patterns or air traffic safety. Further analysis of this issue is not required and no mitigation measures are necessary.

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

Less Than Significant Impact With Mitigation Incorporated. The project proposes residential access to the site from Sunset Avenue and commercial access (i.e., business patrons, employees, and delivery vehicles) from Main Street or Thornton Place. The provision of additional access points to the project site may require roadway dedications to accommodate the project, local traffic, and public parking spaces. As a result of the potential changes to these roadways, this issue will be evaluated in an EIR with feasible mitigation measures incorporated, as necessary.

e.) Result in inadequate emergency access?

No Impact. The project would be designed to ensure suitable movement of residents from Sunset Avenue and business patrons and delivery vehicles from Main Street or Thornton Place. Emergency vehicles could readily access the project sitefrom these streets. Therefore, the proposed project would not result in inadequate emergency access. Further analysis of this issue is not required and no mitigation measures are necessary.

f.) Result in inadequate parking capacity?

Less Than Significant With Mitigation Incorporated. As part of the project, 650 parking spaces would be provided in an on-site subterranean facility. In regards to parking, the project would be self-sufficient by accommodating the project's residents, their guests, and patrons and employees of the commercial uses. The project may also alter the number of public parking spaces, potentially resulting in a beneficial impact. Therefore, this issue will be addressed in an EIR with mitigation measures incorporated, as necessary.

g.) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact. The project would be constructed and operated in compliance with adopted policies, plans, and programs supporting alternative transportation that apply to the project site. However, this issue will be analyzed further and documented in an EIR with feasible mitigation measures incorporated, as necessary

XVI. UTILITIES. *Would the project:*

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

Potentially Significant Impact. The existing wastewater system in the project area may not have the capacity to accommodate the wastewater discharge levels projected for the project. Upon receipt of information regarding wastewater from commenting agencies, a determination of significance will be made. Hence, at this time, the potential for wastewater treatment requirements to be exceeded by the project could result and this issue will be analyzed further analysis in an EIR with feasible mitigation measure incorporated, as necessary.

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

Potentially Significant Impact. The capacity of the area's existing water service may not be sufficient to serve the proposed project. Therefore, construction of the project could result in the need for expansion of either water or wastewater utility systems that may cause significant environmental effects. Upon receipt of information regarding water or wastewater from commenting agencies, a determination of significance will be made. At this time, this issue will be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

Less Than Significant Impact. The proposed project would result a similar level of imperviousness in relation to the existing conditions. As the proposed project would not increase the amount of storm water from the site, construction of new storm water drainage facilities would not result. Further analysis of this issue is required and mitigation is not necessary.

d.) Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Potentially Significant Impact. The potential that existing entitlements are not sufficient to cover the needs of the proposed project does exist. Upon receipt of information regarding water supply from commenting agencies, a determination of significance will be made. Therefore, at this time, this issue will be analyzed further in an EIR with feasible mitigation measure incorporated, as necessary.

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

Potentially Significant Impact. The capacity of the area's existing wastewater service may not be sufficient to serve the proposed project. Upon receipt of information regarding wastewater from commenting agencies, a determination of significance will be made. At this time, this issue will be analyzed in an EIR with feasible mitigation measure incorporated, as necessary.

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

Less Than Significant Impact. Solid waste management services in the City of Los Angeles are provided by the City of Los Angeles, Bureau of Sanitation, various private companies, and Sanitation District of Los Angeles County. Solid waste generated on-site would be collected and transported by a private contractor. Thus, collection and transport of project-related solid waste would have no impact on public services. Site-generated solid waste would be disposed of at one of several Class III landfills located within Los Angeles County. Although Bradley Landfill is scheduled for closure in 2007, the Puente Hills Landfill was issued a conditional use permit to allow landfill operations through 2013 and to provide 38 million tons of additional capacity.[30] The Puente Hills Landfill will also include a materials recovery facility (MRF) to recover recyclable materials from commercial waste. The Puente Hills MRF is currently under construction with scheduled completion by 2004.[31] In addition, permitting for new rail haul landfills in Imperial County (Mesquite Regional Landfill) and Riverside County (Eagle Mountain Landfill) are currently moving forward. The Mesquite Regional Landfill is scheduled to open for rail shipments of waste in 2009. The Eagle Mountain Landfill is in the preliminary planning stages and escrow has not closed on this property, due in part to pending federal litigation.[32]

Based on City of Los Angeles solid waste generation factors, the proposed 225 dwelling units would generate approximately 2,752 pounds of solid waste per day.[33] In addition, the

[30] *County Sanitation Districts of Los Angeles County, Puente Hills Landfill Fact Sheet, Revised November 2003.*

[31] *County Sanitation Districts of Los Angeles County, Puente Hills Landfill Fact Sheet, Revised November 2003.*

[32] *John D. Kilgore, Supervising Engineer, Planning Section, County Sanitation Districts of Los Angeles, correspondence received on the Draft Environmental Impact Report for PacifiCenter at Long Beach, March 3, 2004.*

[33] *Based on a generation rate of 12.23 pounds per household per day for residential uses, as referenced in the City of Los Angeles CEQA Thresholds Guide, May 1998.*

commercial portion of the proposed project, with an estimated 27 employees, would generate approximately 284 pounds of solid waste per day.[34] Total solid waste generated by the proposed project is estimated to be approximately 3,036 pounds per day. Since the existing uses on the site generate approximately 1,286 pounds per day the project will result in a net increase of 1,750 pounds per day (or 235 tons per year).[35] The estimated project-related waste generation would be equivalent to approximately 0.006 percent of the most recently registered (year 2000) solid waste disposed of in the City of Los Angeles, representing a small fraction of regional waste generated.[36] In addition, these waste generation factors do not account for recycling or other waste diversion measures which would further reduce the amount of solid waste disposed of at Class III landfills. As such, the impact of the solid waste generated by the proposed project on the capacity of existing landfills in Los Angeles County would be less than significant. Therefore, further analysis of this issue in an EIR is not required and mitigation is not necessary.

Construction of the proposed project would generate demolition debris, of which a substantial portion is anticipated to be reused on-site or recycled. Under California Public Resources Code 42912 the California Integrated Waste Management Board (CIWMB) is developing a model ordinance and other measures that would encourage local governments to increase their diversion of construction and demolition waste materials from landfills. Demolition debris not re-used on-site or recycled, would be disposed of at one of several unclassified landfills within the Los Angeles County. Since unclassified landfills in the County do not generally have capacity constraints, inert landfills serving the site would have sufficient capacity to accommodate project construction solid waste disposal needs and no impact would occur. No mitigation measures are required.

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

No Impact. Solid waste management is guided by the California Integrated Waste Management Act (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste and mandates that 50 percent of the solid waste in the State be diverted from landfills as of 2000. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The

[34] *Based on a generation rate of 10.53 pounds per employee per day for commercial use, as referenced in the City of Los Angeles CEQA Thresholds Guide, May 1998.*

[35] *Based on a generation rate of 8.93 pounds per employee per day for industrial use, as referenced in the City of Los Angeles CEQA Thresholds Guide, May 1998.*

[36] *This is based on the total solid waste disposal rate in the City of Los Angeles for the year 2000, which was approximately 3.9 million tons, as documented by the California Integrated Waste Management Board. Available at: http://www.ciwmb.ca.gov/profiles/juris..*

City of Los Angeles prepared a Solid Waste Management Policy Plan that was adopted by the City Council in 1994.

The proposed project would operate in accordance with the City's Solid Waste Management Policy Plan in addition to applicable federal and state regulations associated with solid waste. As described in City Ordinance No. 171,687, development of the multi-family residential and commercial uses would require the provision of areas for collecting and loading recyclable materials. Since the proposed project would comply with federal, state, and local statutes and regulations related to solid waste, no impact would occur. Further analysis of this issue in an EIR is not required and mitigation measures would not be necessary.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant With Mitigation Incorporated. As discussed in more detail in Section IV above, the proposed project would not degrade the environment in ways that would reduce the habitat of wildlife species, nor would the project adversely effect important examples of the major periods of California History or prehistory, with implementation of mitigation measures to account for accidental discovery.

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

Potentially Significant Impact. The project's contribution to potential cumulative impacts associated with each of the topical issues discussed above was considered. It was determined that the project would not contribute to cumulative impacts associated with agricultural resources or mineral resources, as there are no such resources in the immediate project area. In addition, the project would not contribute to significant cumulative impacts associated with biological resources, population and housing, public services, or recreation due to the developed nature of the project area and the area in the vicinity of the proposed related

projects. However, it is recommended that the project's potential contribution to cumulative impacts associated with aesthetics, air quality, cultural resources, geology and soils, land use, noise, utilities, and transportation will be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.

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

Potentially Significant Impact. Construction and operation of the proposed project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. These potential effects could be associated with aesthetics, air quality, cultural resources, geology and soils, land use, noise, and transportation. These potential impacts will be analyzed further in an EIR with feasible mitigation measures incorporated, as necessary.