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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

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The City of Los Angeles has determined through the preparation of an Initial Study (see Appendix A) that the proposed Wilshire Comstock Project would not result in potentially significant impacts related to the environmental topics listed below. Section 15128 of the CEQA Guidelines states:

*“An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore no discussed in detail in the EIR. Such a statement may be contained in an attached copy of the Initial Study.”*

It has been determined that there is no substantial evidence that the proposed Wilshire Comstock Project would cause significant environmental effects in the following areas; therefore, no further environmental review of these issues is necessary for the reasons described below. For further analysis of each issue, see the Initial Study that was prepared for the proposed project, which is contained in Appendix A.

The Initial Study also determined that some issues may have potential adverse impacts on the environment, including Aesthetics, Air Quality, Geology and Soils, Hydrology, Land Use, Noise, and Transportation/Traffic. Analyses of these issues are not included below, as each issue is analyzed in greater depth in Section IV (Environmental Impact Analysis) of this EIR.

#### **Agricultural Resources**

*The project would not 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. The project site is located in a heavily developed area of the City of Los Angeles and does not include any “Important Farmland” as designated by the Division of Land Protection.<sup>1</sup> Therefore, no further discussion of this issue is required.*

*The project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract. Neither the project site nor the nearby properties are currently utilized for agricultural activities;*

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<sup>1</sup> *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

therefore, the proposed project would not involve the conversion of agricultural land to another use. In addition, the project site is not under a Williamson Act contract.<sup>2</sup> No impact on farmland or agricultural resources would occur, and no further discussion of this issue is required.

*The project would not involve other changes in the existing environment, which due to their location or nature, could result in the conversion of Farmland to non-agricultural use.* Neither the project site nor the nearby properties are currently utilized for agricultural activities and, as discussed above, the project site is not classified in any “Farmland” category designated by the State of California. No conversion of Farmland would occur. Therefore, no further discussion of this issue is required.

### **Biological Resources**

*The project would not 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 regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.* The project site, located within the City of Los Angeles, is surrounded by urban development. There are no natural open spaces or areas of significant biological resource value on the project site or in the vicinity of the project site. No candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS), are expected to occur on the project site, as the site contains no habitat for such species. Additionally, no riparian or other sensitive habitat areas are located on or adjacent to the project site.<sup>3</sup> Review of the National Wetlands Inventory identified no protected wetlands in the project area.<sup>4</sup> Therefore, the project site does not support any riparian or wetland habitat as defined by Section 404 of the Clean Water Act. No wildlife corridors are located on-site or in the project area due to the high level of existing urban development. The proposed project would not have an impact on any biological resources or habitat and no further study is necessary.

In addition, local ordinances protecting biological resources are limited to the City of Los Angeles Oak Tree Preservation Ordinance. The project site is currently vacant and does not contain any oak trees. The project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

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<sup>2</sup> *Williamson Act Program, California Division of Land Resource Protection, website: <http://www.consrv.ca.gov/DLRP/lca/index.htm>, February 19, 2004.*

<sup>3</sup> *Los Angeles City Planning Department, Environmental and Public Facilities Maps: Significant Ecological Areas, September 1, 1996.*

<sup>4</sup> *U.S. Fish & Wildlife Service, National Wetlands Inventory, website: <http://www.nwi.fws.gov>, June 1, 2004.*

Thus, the project site would not affect any local polices or ordinances protecting or preserving biological resources. Therefore, no further discussion of this issue is required.

*The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.* The project site is located in a previously-developed, heavily urbanized area of the City of Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the project site.<sup>5</sup> Implementation of the proposed project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. Therefore, no further discussion of this issue is required.

*The project would not 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.* Review of the National Wetlands Inventory identified no protected wetlands in the project area.<sup>6</sup> Therefore, the project site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see discussion above). No project impacts to riparian or wetland habitats would occur and no further study is necessary. Therefore, no further discussion of this issue is required.

*The project would not 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.* The project site is located in a heavily developed area of the City of Los Angeles. No wildlife corridors are located on-site or in the project area due to the high level of existing urban development. No project impacts to fish or wildlife corridors would occur. Therefore, no further discussion of this issue is required.

*The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands).* Local ordinances protecting biological resources are limited to the City of Los Angeles Oak Tree Preservation Ordinance. The project site is currently vacant and does not contain any oak trees. Thus, the project site would not affect any local polices or ordinances protecting or preserving biological resources. No project impacts to locally protected biological resources would occur. Therefore, no further discussion of this issue is required.

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<sup>5</sup> Los Angeles City Planning Department, *Environmental and Public Facilities Maps: Significant Ecological Areas, September 1, 1996.*

<sup>6</sup> U.S. Fish & Wildlife Service, *National Wetlands Inventory, website: <http://www.nwi.fws.gov>, June 1, 2004.*

*The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No project impacts to any adopted habitat or conservation plans would occur. Therefore, no further discussion of this issue is required.*

### **Cultural Resources**

*The project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. There are no National Register or California State Historic Resource properties, California Historical landmarks, California Points of Historic Interest or City of Los Angeles Historic-Cultural Monuments on the project site. The closest City of Los Angeles Historic-Cultural Monuments is the Holmby House, located approximately 0.5 mile west of the project site.<sup>7</sup> Therefore, no project-related impacts to historical resources would occur, and no further discussion of this issue is required.*

*The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. The project site is located in an urbanized area. As determined by the City of Los Angeles, no archaeological sites or survey areas have been identified on the project site.<sup>8</sup> Any surface archeological remains that might have once occurred on the project site would have long since been eliminated by past development activities. However, there is a remote possibility that archeological resources exist below the surface of the project site, and that these remains could be encountered during site preparation. Although no further evaluation of this issue is necessary, mitigation is recommended, consistent with standard City of Los Angeles Conditions of Approval, to protect any previously unidentified archeological resources uncovered by project construction activity. Implementation of the measures below would ensure that project impacts to unknown archaeological resources would be less than significant, and these measures will be carried forward to the Mitigation Monitoring Report Plan (MMRP) for the proposed project. No further discussion of this issue is necessary.*

*The project would not disturb any human remains, including those interred outside of formal cemeteries. The project site is located in an urbanized area, and there is so evidence of human remains existing on the site. However, there is a remote possibility that unknown human remains exist below the surface of the project site, and that these remains could be encountered during site preparation.*

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<sup>7</sup> City of Los Angeles Cultural Affairs Department, website: <http://www.culturela.org/>, June 1, 2004.

<sup>8</sup> Los Angeles City Planning Department, *Environmental and Public Facilities Maps: Prehistoric & Historic Archaeological Sites & Survey Areas and Vertebrate Paleontological Resources*, September 1, 1996.

Although no further evaluation of this issue is necessary, mitigation is recommended, consistent with standard City of Los Angeles Conditions of Approval, to protect any previously unknown human remains uncovered by project construction activity. Implementation of the measures below would ensure that project impacts to unknown human remains would be less than significant, and these measures will be carried forward to the Mitigation Monitoring Report Plan (MMRP) for the proposed project. No further discussion of this issue is necessary.

### ***Mitigation Measures***

1. In the event that subsurface archaeological resources/human remains are encountered during the course of grading and/or excavation, all development must temporarily cease in these areas until the archaeological resources are properly assessed and subsequent recommendations are determined by a qualified archaeologist. In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent remains or archaeological resources.
2. Copies of the archeological survey, study, or report shall be submitted to the South Central Coastal Information Center at California State University, Fullerton.

*The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.* There are no known paleontological resources on the project site.<sup>9</sup> There is a remote possibility that unsuspected paleontological resources exist below the ground surface and could be encountered during construction. Although no further evaluation of this issue is recommended, periodic monitoring during construction is recommended, consistent with standard City of Los Angeles Conditions of Approval, to protect any previously unidentified paleontological resources uncovered by project construction activity. Implementation of the measures below would ensure that project impacts to unknown archaeological resources would be less than significant, and these measures will be carried forward to the MMRP for the proposed project. No further discussion of this issue is necessary.

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<sup>9</sup> *Environmental and Public Facilities Maps, Los Angeles City Planning Department: Prehistoric & Historic Archeological Sites & Survey Areas and Vertebrate Paleontological Resources, September 1, 1996.*

**Mitigation Measures**

1. If any paleontological materials are encountered during the course of project development, construction activities in these areas shall be temporarily halted.
2. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology, which can be found at the following universities: USC, UCLA, California State University at Los Angeles, and California State University at Long Beach, or at the County Museum, to assess paleontological resources and evaluate potential impacts.
3. Copies of any paleontological survey, study, or report shall be submitted to the Los Angeles County Natural History Museum.

**Hazards and Hazardous Materials**

*The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.* Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area consist of the multi-family residential uses located west of the project site and single-family residential uses located south of the project site. Other than typical cleaning solvents used for janitorial purposes, no hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the proposed project. Therefore, no impact would occur and no further discussion of this issue is required.

*The project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.* As discussed previously, the proposed project would use, at most, minimal amounts of hazardous materials for routine cleaning, and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. No impact would occur, and no further discussion of this issue is required.

*The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.* There are no schools located within one-quarter mile of the project site. The nearest school, Warner Avenue Elementary, is approximately 0.6 mile from the project site. In addition, as stated above, the proposed project would use, at most, minimal amounts of hazardous materials and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. Thus, there would be no impact concerning the emission of hazardous materials near an existing school or proposed school, and no further discussion of this issue is required.

*The project would not result in any impacts related to being 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.* California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The project site is not included on any of the above lists.<sup>10</sup> No impact would occur, and no further discussion of the issue is required.

*The project would not result in a safety hazard for people residing or working in the project area by being located within an airport land use plan, or within two miles of a public airport or public use airport.* The nearest airport is the Santa Monica Airport, a general aviation airport located approximately 6.4 miles to the southwest of the project site. Furthermore, the project site is not in an airport land use plan.<sup>11</sup> Therefore, no impact would occur, and no further discussion of this issue is required.

*The project would not result in a safety hazard for people residing or working in the project area by being located within the vicinity of a private airstrip.* The proposed project is not located in the vicinity of a private airstrip. No impact would occur, and no further discussion of the issue is required.

*The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.* The proposed project would not be expected to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, nor would it generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Therefore, the proposed project would not be expected to interfere with or disrupt an adopted emergency response plan or emergency evacuation plan, and no further discussion of the issue is required.

*The project would not 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.* The project site is located in an urbanized portion of the City of Los

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<sup>10</sup> Environmental Protection Agency, *Superfund*, website: <http://www.epa.gov/superfund/sites/index.htm>, June 1, 2004.

<sup>11</sup> City of Los Angeles Department of Planning, *Zone Information and Map Access System*, website: <http://zimas.lacity.org/>, June 1, 2004.

Angeles that does not include wildlands or high fire hazard terrain or vegetation.<sup>12</sup> No impact would occur, and no further discussion of the issue is required.

### **Water Quality**

*The project would not discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems.* These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The project would not include industrial discharge to any public water system and would, therefore, not violate any water quality standards or waste discharge requirements. With appropriate project design and compliance with the applicable federal, State, and local regulations, Code requirements, and permit provisions, no significant impacts related to potential discharge into surface water or changes in water quality are anticipated and no further study is necessary.

### **Mitigation Measures**

1. Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. The applicant shall meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board.

*The project would not include potential sources of water pollutants that would have the potential to substantially degrade water quality.* The proposed project does not include other potential sources of contaminants which could potentially degrade water quality. Therefore, the proposed project would not degrade water quality and no further study is necessary.

*The project would not placing housing in a 100-year flood zone.* As indicated by the City of Los Angeles, the project site is not located within a 100-year flood zone.<sup>13</sup> The project site is located in

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<sup>12</sup> City of Los Angeles Department of Planning, Zone Information and Map Access System, website: <http://zimas.lacity.org/>, June 1, 2004.

<sup>13</sup> City of Los Angeles Bureau of Engineering, Navigate LA, website: <http://navigatela.lacity.org/floodgis/index01.cfm>, June 1, 2004.



Zone C, defined as areas with less than 1.0 percent annual probability of flooding.<sup>14</sup> Therefore, the proposed project would not have risks of flooding and no further study is necessary.

*The project is not located within a 100-year flood zone, which could thus impede or redirect flood flows.* As discussed above, the project site is not located within a 100-year flood hazard area. The project site is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further study is necessary.

*The project would not expose people or structures to a significant risk of loss or death caused by a seiche, which is a surface wave created when a body of water is shaken, or inundation, which is due to water storage facility failure.* The project site does not lie in a potential inundation area.<sup>15</sup> There are no major dams or waterways located on or near the project site. As discussed above, flooding from other sources is not expected. Therefore, a minimal risk of flooding from dam failure would not be exacerbated. No impact would occur to people as a result of flooding and no further study is necessary.

*The project site is not sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.* The Pacific Ocean is located approximately five miles to the west of the project site. The project site does not lie in a potential tsunami zone.<sup>16</sup> Tsunamis are considered to be a remote possibility that would likely only occur during extremely severe seismic shaking conditions. As mentioned above, the project site does not lie in a potential inundation area. The project site is not in a hillside area or located near a stream or river, and would therefore not be subject to mudflow impacts. There is no potential for significant risk of loss or death as a result of a seiche, tsunami, or mudflow and no further study is necessary.

## **Mineral Resources**

*The project would not 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.* There are no known mineral resources beneath the project site. No classified or designated mineral deposits of statewide or regional significance are

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<sup>14</sup> City of Los Angeles Bureau of Engineering, *Navigate LA*, website: <http://navigatela.lacity.org/floodgis/index01.cfm>, June 1, 2004.

<sup>15</sup> Los Angeles City Planning Department, *Environmental and Public Facilities Maps: Inundation and Tsunami Hazard Areas*, September 1, 1996.

<sup>16</sup> Los Angeles City Planning Department, *Environmental and Public Facilities Maps: Inundation and Tsunami Hazard Areas*, September 1, 1996.

known to occur in the project area. The project site is not within a known source area for aggregate or other mineral resources.<sup>17</sup> Additionally, the project site is not located in an area of potential petroleum resources.<sup>18</sup> Therefore, the proposed project would not 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 would occur to mineral resources, and no further discussion of this issue is required.

*The project would not 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.* As discussed in previously, the project site is not delineated as a locally-important mineral resource recovery site on any city plans. Therefore, implementation of the proposed project would not result in the loss of availability of a locally-important mineral resource recovery site.<sup>19</sup> No impact would occur to designated mineral resource recovery sites, and no further discussion of the issue is required.

### **Population and Housing**

*The project would not 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).* As part of its comprehensive planning process for the Southern California region, the Southern California Association of Governments (SCAG) has divided its jurisdiction into 14 subregions. The project site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. In 2000, the City of Los Angeles Subregion had an estimated permanent population of 3,844,923 persons and approximately 1,278,653 housing units. By the year 2005, SCAG forecasts an increase to 4,030,122 persons (a 4.8 percent increase) and 1,323,162 housing units (a 3.5 percent increase). Between the years 2005 and 2020, SCAG forecasts an increase to 4,570,707 persons (a 13.4 percent increase) and 1,619,809 housing units (a 22.4 percent increase).

A summary of population and housing demographics for the Westwood Community Planning Area, the planning subarea in which the project site is located, is presented in Table IV.A-1, below. The Westwood Community Planning Area had a total population of 49,306 persons in 2000 and a total of

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<sup>17</sup> *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Figure GS-6, January 19, 1995.*

<sup>18</sup> *Safety Element of the Los Angeles City General Plan, November 1996, Exhibit E: Oil Field and Oil Drilling Areas in the City of Los Angeles.*

<sup>19</sup> *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Figure GS-1, January 19, 1995.*

20,500 housing units.<sup>20</sup> This equates to an average of approximately 2.4 persons per household. Applying this figure to the proposed project, the project can be expected to generate a total resident population of 89 persons if 35 residential units and 2 housekeeping suites are developed. This represents an increase of 0.18 percent of the total resident population in the Westwood Planning Area, which would not represent substantial population growth within the area. The increase in housing supply would be considered a beneficial impact. In this case no impact would be created, and no further discussion of this issue is required.

**Table IV.A-1**  
**Summary of Population and Housing Demographics**  
**for the Westwood Community Planning Area**

	Census 1990	Census 2000	2002 Estimate
<b>Total Population<sup>1, 2</sup></b>	42,922	49,306	50,406
Annual Growth Rate	n/a	1.396%	0.886%
Population/Density (per square mile)	11,015	12,653	12,935
<b>Total Housing Units</b>	19,948	20,500	20,585
Annual Growth Rate	n/a	0.274%	0.165%
<b>Single-family Housing Units<sup>3</sup></b>	3,559	2,442	3,602
Annual Growth Rate	n/a	-3.698%	16.824%
<b>Multiple-family Housing Units<sup>4</sup></b>	16,098	16,943	16,959
Annual Growth Rate	n/a	0.513%	0.039%
<b>Nonsingle-family Housing Units<sup>5</sup></b>	16,389	18,058	16,982
Annual Growth Rate	n/a	0.975%	-2.428%
<sup>1</sup> Resident Population consists of those who live in housing units in the same area covered by Total Population. It is equal to "Total Population in Households."			
<sup>2</sup> Group Quarters Population includes persons in student dormitories, military barracks, prisons, and health care institutions. Group Quarters and Resident Populations sum to Total Population.			
<sup>3</sup> Single-family Housing Units (SfHUs) only include detached dwellings.			
<sup>4</sup> Multiple-family Housing Units (MfHUs) include apartment buildings (both for rent and condominiums), duplexes, artist-in-residence lofts, and attached single-family housing units.			
<sup>5</sup> Nonsingle-family Housing Units (NsHUs) add mobile homes, boats, and other living quarters to MfHUs. Its sum with SfHUs yield all living quarters for residents of the census tract. This value is consistent with the definitions used by the Southern California Association of Governments (SCAG) and the California Department of Finance (DoF).			
Source: Los Angeles Department of City Planning, Demographic Research Unit, website: <a href="http://www.lacity.org/PLN/">http://www.lacity.org/PLN/</a> , June 2, 2004.			

The project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. The proposed project would involve the development of a vacant lot

<sup>20</sup> Los Angeles Department of City Planning, Statistical Information, website: <http://www.lacity.org/PLN/>, June 2, 2004.

with 35 condominium uses. No residential displacement would be associated with the proposed project. Therefore, no project impact would occur, and no further discussion of this issue is required.

*The project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.* The proposed project would involve the development of a vacant lot with 35 condominium uses. No population displacement would be associated with the proposed project. Therefore, no project impact would occur, and no further discussion of this issue is required.

### **Public Services**

*The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:*

#### ***Fire Protection***

The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. The maximum response distances for residential uses are 1.5 miles from an LAFD Engine Company and 2.0 miles from an LAFD Truck Company. When response distances exceed these requirements, all structures must be equipped with automatic fire sprinklers systems and any other fire protection devices deemed necessary by the Fire Chief (i.e., fire signaling systems, fire extinguishers, smoke removal systems, etc.). The proposed project is approximately 1.3 miles from Fire Station No. 71, located at 107 South Beverly Glen. Fire Station No. 71 is a Paramedic Engine Company. The other fire station that might respond to an emergency at the project site is Fire Station No. 37, located at 1090 Veteran Avenue, approximately 1.8 miles from the project site.<sup>21</sup> This response distance is within the City Fire Code requirements. Therefore, no impacts with respect to distance criteria would occur. In addition, the proposed project would incorporate a number of fire safety features in accordance with applicable City fire-safety code and ordinance requirements for construction, access, fire flows, and fire hydrants.

The required fire flow is closely related to the type and size of the 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. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In

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<sup>21</sup> Draft L.A. CEQA Thresholds Guide, City of Los Angeles, May 14, 1998.

any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing.

As determined by the LAFD, the overall fire flow requirement for the proposed project is 4,000 gpm from four fire hydrants flowing simultaneously (LAMC Section 57.09.07). There are two fire hydrants available within the project vicinity; one is located at the southwest corner of Wilshire Boulevard and Comstock Avenue, while the other is at the corner of Club View Drive and Comstock Avenue. The City would review the proposed project requirements to assure that the hydrants would adequately serve the project site. The proposed project would contribute to the necessary additions, if any. Furthermore, there is a possibility that an increase in water consumption might exceed the capacity of the existing distribution facilities. If this occurs, special arrangements must be made with LADWP to enlarge the supply line(s). Therefore, with implementation of the following mitigation measures, impacts to fire protection services by the proposed project would be less than significant. These measures will be carried forward to the Mitigation Monitoring Report Plan (MMRP) for the proposed project. No further discussion of this issue is necessary

#### *Mitigation Measures*

1. Adequate off-site public and on-site private fire hydrants may be required. Their number and locations are to be determined after the LAFD's review of the plot plan.
2. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of a Fire Department aerial ladder apparatus, or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
3. 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.
4. Access for Fire Department apparatuses and personnel to and into all structures shall be required.
5. No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance for residential uses shall be computed to front door of the unit.
6. 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.

### ***Police Protection***

The proposed project is located in the West Los Angeles Area within Reporting District (RD) 8A52 and would be served by the West Los Angeles Community Police Station, located at 1663 Butler Avenue. The West Los Angeles Area, which covers approximately 65 square miles, is defined by the following boundaries: Mulholland Drive to the north, the Santa Monica Freeway (I-10) and the City of Santa Monica to the south, the Pacific Ocean and the City of Santa Monica to the west, and Schuyter Road, Whittier Drive, and La Cienega Avenue to the east. The boundaries for RD 8A52 are Wilshire Boulevard to the north, the Los Angeles Country Club and the San Diego Freeway (I-405) to the west, Exposition Boulevard to the south, and Centinela Avenue to the east. The predominant crimes in the West Los Angeles Area are aggravated assault, burglary, and grand theft automobile.<sup>22</sup>

The project site has been used seasonally as a pumpkin sales lot and Christmas tree sales lot, which attracts a large amount of visitors to the area. Implementation of proposed project, which would operate year-round rather than seasonally, would result in an increase in the frequency of site visitors, residents, and employees within the project site, thereby generating a potential increase in the level of service calls from the project site. Responses to thefts, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increase in on-site activity and increased traffic on adjacent streets and arterials.

By nature, the residential use of the property would, in and of itself, act as a crime deterrent. The continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the project residents would be able to monitor suspicious activity at the building entry points.

The proposed project would also include adequate and strategically positioned functional and thematic lighting to enhance public safety. Hard-to-see and infrequently accessed “dead zones” would be limited and, where possible, security-controlled to limit public access. In addition, operation of the proposed project would include crime prevention features such as nighttime security lighting and secure parking facilities. Implementation of the preventative and proactive security measures listed below would reduce impacts to a less than significant level, and these measures will be carried forward to the Mitigation Monitoring Report Plan (MMRP) for the proposed project. No further discussion of this issue is necessary.

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<sup>22</sup> *Los Angeles Police Department, Crime Statistics, website: <http://www.lapdonline.org/index.htm>, June 2, 2004.*

*Mitigation Measures*

1. Parking facilities shall be secured.
2. Access control shall be provided to the residential portion of the proposed buildings.
3. Public and semi-public space shall be designed to be well illuminated, with a minimum of dead space to eliminate concealment.
4. Plot Plans, including lighting and landscaping information, shall be submitted to the Los Angeles Police Department Crime Prevention Unit for review. Please refer to Design out Crime Guidelines: Crime Prevention through Environmental Design published by the LAPD's Crime Prevention Section.

*Schools*

The ability of the LAUSD schools serving the project site to handle the proposed project is analyzed by comparing school enrollments and capacities to the projected student population increase due to development of the proposed project. There are no school facilities on or adjacent to the project site. The project area is served by the following LAUSD public schools: Fairburn Elementary School (grades K-5), located at 1403 Fairburn Avenue; Emerson Middle School (grades 6-8), located at 1650 Selby Avenue; and University Senior High School (grades 9-12), located at 11800 Texas Avenue. As shown in Table IV.A-2, the proposed project would generate approximately 13 students.

**Table IV.A-2**  
**Estimated Student Generation by the Proposed Project**

<b>Proposed Project</b>	<b>Size</b>	<b>Total Elementary School Students (0.2089 per unit)<sup>a</sup></b>	<b>Total Middle School Students (0.0942per unit)<sup>a</sup></b>	<b>Total High School Students (0.0891 per unit)<sup>a</sup></b>
Multi-family Residential Units <sup>b</sup>	35 du	7	3	3
<sup>a</sup> Factors rounded to the nearest whole number. <sup>b</sup> Housekeeping Suites not taken into account, as they would not house young families. Source: School Facilities Fee Plan, LA Unified School District, March 2, 2002.				

Although the proposed project is not expected to overcrowd neighborhood schools, the California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The School Facilities Fee Plan (March 2, 2002) for the LAUSD has been prepared to support the school

district's levy of the fees authorized by Section 17620 of the California Education Code. Per section 65995.5-7 of the Government Code, the Level 2 residential developer fees have been imposed at a rate of \$3.73 per square foot on new residential construction within the boundaries of the LAUSD.<sup>23</sup> Because the project applicant would be required to pay all applicable developer fees to the LAUSD pursuant to Government Code Section 65995-7, any potential impacts upon school facilities would be mitigated to a less than significant level. Therefore, impacts would be less than significant and no further discussion is necessary.

### ***Parks***

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The park and recreation facilities that are within two and a half miles of the project site include Coldwater Park, Greystone Park, and West Hollywood Park.

The Public Recreation Plan, a portion of the Service Systems Element of the General Plan of the City of Los Angeles, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The standard ratio of neighborhood and community parks to population is four acres per 1,000 people. The project site is within a highly urbanized area which is currently well below meeting this standard ratio. Using the ratio of 2.4 persons per residential unit (see Population and Housing analysis, above), it is estimated that the development of the proposed project would result in an increase of 84 permanent residents. Therefore, the proposed project would further increase the City's existing parkland acreage per capita deficiency. Payment of the required Quimby Act mitigation fees and the mandatory dwelling unit construction tax (discussed below) would alleviate impacts on existing parks; however, there would still be a serious lack of park facilities for the future residents of the proposed project.

Pursuant to Section 10.21.3 of the Los Angeles Municipal Code (LAMC), the City of Los Angeles imposes a mandatory dwelling unit construction tax to mitigate impacts upon park and recreational facilities. The tax collected pursuant to this ordinance is required to be placed in a "Park and Recreational Sites and Facilities Fund," to be exclusively for the acquisition and development of park and recreational sites and facilities. Any future residential development on the project site, including the proposed project, would be subject to this tax. Therefore, potential impacts upon neighborhood or regional parks would be mitigated to a less than significant level. Furthermore, if the proposed project

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<sup>23</sup> *Los Angeles Unified School District (LAUSD), Accounting and Disbursements Division, Notice to Developer Owners, October 14, 2003. These rates are valid from October 14, 2003 to October 14, 2004 and are subject to change.*



were to include “for sale” units, the applicable provisions of Section 17.12 of the LAMC would also apply, requiring the project applicant to pay all applicable Quimby fees to the City of Los Angeles for the construction of condominium uses. Therefore, the proposed project’s impact upon parks and recreational facilities would be mitigated to a less than significant level and no further study is necessary.

#### *Mitigation Measures*

1. Per Section 17.12-A of the Los Angeles Municipal Code, the applicant shall pay all applicable Quimby fees for the construction of the proposed project.

#### *Other Public Facilities*

As discussed in previously, the proposed project would not result in a significant population increase. However, the City of Los Angeles Public Library could recommend that the developer pay a \$200 per capita fee in order for City libraries to purchase any additional library materials if they foresee a potential impact. Therefore, project impacts would be less than significant, and no further discussion of this issue is required.

#### **Recreation**

*The project would not 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.* The proposed project would not cause a significant impact with regard to recreation or parks demand, as evaluated above. Maintenance of public parks and public recreational facilities in Los Angeles is funded largely through the City general fund and through Quimby and other park fees for new development. As demand for park services by the proposed project is considered less than significant, project impacts on maintenance of those facilities would likewise be less than significant, and no further discussion of this issue is required.

The project would not include public recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The proposed project involves the construction of a residential project and not the construction of park facilities. There would be no impact, and no further discussion of this issue is required.

#### **Utilities**

*The project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.* The proposed project is a residential use. Consequently, the proposed project would not be expected to generate any wastewater discharge that would exceed the wastewater

treatment requirements of the Los Angeles Regional Water Quality Control Board. Also, see Sections 7(a), 8(a), and 8(f) in the Initial Study contained in Appendix A. Therefore, impacts with respect to wastewater treatment requirements would be less than significant, and no further discussion of this issue is required.

*The project would not 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.*

### **Water Consumption**

The Los Angeles Department of Water and Power (LADWP) is responsible for providing water service to the project site. LADWP has stated that they can supply water to the proposed project site with water from the municipal system, subject to the Water System Rules and all conditions as set by LADWP.<sup>24</sup> In addition, LADWP can generally supply water to developments within its service area, except under extraordinary circumstances such as prolonged drought. The General Plan Framework anticipated that the future supply of water would be sufficient to meet existing and planned growth in the City of Los Angeles to the year 2010.

Water consumption for the proposed project was estimated from wastewater generation factors. In order to present a conservative analysis, water consumption is assumed to be 120 percent of the wastewater generated for a given land use, as determined by wastewater generation rates recommended by the City of Los Angeles. As seen in Table IV.A-3, the proposed project is projected to consume approximately 8,880 gallons of water per day (gpd).

**Table IV.A-3  
Proposed Project Water Consumption**

Land Use	Size	Consumption Rate <sup>a</sup> (gallons/day)	Water Consumption Gallons Per Day (gpd)
Condominiums	35 du	240/du	8,400 gpd
Housekeeping Suites <sup>b</sup>	2 du	240/du	480 gpd
Total			8,880 gpd
<sup>a</sup> Source: Draft LA CEQA Thresholds Guide, May 14, 1998.			
<sup>b</sup> Assuming a worst case scenario.			

<sup>24</sup> Correspondence from LADWP, Hugo A. Torres, Water Distribution Engineering, November 9, 2004.

Due to statewide drought conditions in the mid-1970s and late 1980s, there is a need for water conservation in periods of water shortage. Nevertheless, as described by the LADWP, water should be conserved at all times, because efficient use of water allows increased water shortage for use in dry years and makes water available for beneficial environmental uses. Recommendations for conserving water are listed below. Furthermore, if upgrades to the local water distribution system would be necessary special arrangements would be made with the LADWP to determine the system upgrades required to meet the needs of the proposed project's demand for water. However, since water supplies for the Los Angeles Region are considered ample enough to serve existing and planned development in the area, including the proposed project, the project's impact on water availability would be less than significant, and no further discussion of this issue is required.

### *Wastewater Generation*

The LADWP also provides sewer service to the project area. Sewage from the project site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP). According to the Draft L.A. CEQA Thresholds Guide, recent expansions completed at the HTP and in the conveyance infrastructure have increased the HTP's capacity for full secondary treatment to 450 million gallons per day (mgd). Currently, the plant treats an average dry weather flow of approximately 350 million gallons per day and covers an area of approximately 515 square miles.

Wastewater generation rates for the proposed project were recommended by the City of Los Angeles. As seen in Table IV.A-4, the proposed project is projected to generate approximately 5,920 gallons of wastewater per day. Because there is adequate treatment capacity within the HTP system, the increase in wastewater generation by the proposed project would not result in a significant impact on the local sewer lines and/or the HTP facility. However, the City has stated that the necessary permit application process would still be required through the Bureau of Engineering. The Bureau of Engineering may then conduct a sewer availability study to thoroughly evaluate the additional flow impact to the wastewater system. Therefore, the proposed project's sewer impacts would be less than significant, and no further discussion of this issue is required.

No significant impacts have been identified and no mitigation measures are required. However, the following measures are recommended to reduce project impacts even further:

### *Mitigation Measures*

1. The landscape irrigation system shall be designed, installed, and tested to provide uniform irrigation coverage for each zone. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets. Each zone (sprinkler valve) shall water plants

having similar watering needs (do not mix shrubs, flowers, and turf in the same watering zone).

**Table IV.A-4  
Proposed Project Sewage Generation**

Land Use	Size	Generation Rate <sup>a</sup> (gallons/day)	Sewage Generation Gallons Per Day (gpd)
Condominiums	35 du	160/du	5,600 gpd
Housekeeping Suites <sup>b</sup>	2 du	160/du	320 gpd
Total			5,920 gpd
<sup>a</sup> Source: Draft LA CEQA Thresholds Guide, May 14, 1998.			
<sup>b</sup> Assuming a worst case scenario.			

2. Automatic irrigation timers should be set to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times shall be adjusted for all zones seasonally, reducing watering times and frequency in the cooler months (i.e., fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.
3. Selection of drought-tolerant, low water consuming plant varieties shall be used to reduce irrigation water consumption.
4. If available, recycled water shall be used to irrigate large landscaped areas.
5. Ultra-low-flush water closets, ultra-low-flush urinals, and water-saving showerheads must be installed in both new construction and when remodeling. Low flow faucet aerators shall be installed on all sink faucets.
6. Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). The LADWP shall be contacted for specific information on appropriate measures.
7. Recirculating or point-of-use hot water systems shall be installed, where feasible, to reduce water waste in long piping systems where water must be run for considerable periods before heated water reaches the outlet.
8. Water-conserving clothes washers and dishwashers shall be provided where feasible. Water savings also represent energy savings, in that the water saved by these appliances is typically heated.

*The project would not 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.* The proposed project would not significantly increase runoff, since portions of the project site would remain covered with impermeable surfaces. See also Section IV.E (Hydrology) in this EIR. Project impacts to storm drain facilities would be less than significant, and no further discussion of this issue is required.

The project would not have significant water supplies available to serve the project from existing entitlements and resources, nor are new or expanded entitlements needed. As mentioned previously, any project that is consistent with the City's General Plan has been taken into account in the planned growth in water demand. The project would have a less than significant impact upon water supplies, and no further discussion of this issue is required.

*The project would not 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.* The Hyperion Treatment Plant is anticipated to be able to meet the sewage treatment needs for the proposed project, as discussed previously. Less than significant impacts would occur, and no further discussion of this issue is required.

### ***Solid Waste Generation***

*The project would not result in significant impacts related to being served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.* Solid waste generated in the City of Los Angeles is typically disposed of at the Sunshine Canyon Landfill north of Granada Hills, the Bradley Landfill and Recycling Center in Sun Valley, or the Olinda Alpha Landfill in Orange County. However, facility expansions and new landfills are continuously being sought as the capacities of existing facilities diminish. The capacities and estimated dates of closure for each landfill that may receive solid waste from the project site are included in Table IV.A-5, below. It is also important to note that mandatory City waste reduction and recycling programs are greatly reducing the amount of solid waste that would otherwise enter local landfills. Solid waste would be generated by the proposed project by short-term construction activities and long-term operational activities. Discussions for the construction and operational phases are provided below.

**Table IV.A-5  
Landfill Capacity and Intake**

<b>Landfill Facility</b>	<b>Estimated Closure Date</b>	<b>Permitted Daily Intake (tons per day)</b>	<b>Average Daily Intake (tons per day)</b>	<b>Remaining Permitted Daily Intake (tons per day)</b>
Bradley Landfill <sup>a</sup>	2007	10,000	3,447	6,553
Sunshine Canyon Landfill <sup>a</sup>	2008 <sup>b</sup>	6,600	5,798	802
Olinda Alpha Landfill	2013	8,000	5,342	2,658
<p><sup>a</sup> Bradley Landfill and Sunshine Canyon Landfill are in the process of expanding their facilities to accommodate additional solid waste.</p> <p><sup>b</sup> After the proposed expansion into City area is completed, the Sunshine Canyon Landfill is estimated to have a additional 21-year life span.</p> <p>Source (Bradley and Sunshine Canyon Landfills): Los Angeles County Department of Public Works, Environmental Programs Division, Los Angeles County Integrated Waste Management Plan, 2002 Annual Report, February 2002.</p> <p>Source (Olinda Alpha Landfill): California Integrated Waste Management Board, Solid Waste Information System, website: <a href="http://www.ciwmb.ca.gov/SWIS/Search.asp">http://www.ciwmb.ca.gov/SWIS/Search.asp</a>, and 2002 Landfill Summary Tonnage Report, website: <a href="http://www.ciwmb.ca.gov/landfills/tonnage/2002/landfill.htm">http://www.ciwmb.ca.gov/landfills/tonnage/2002/landfill.htm</a>, March 24, 2004.</p>				

### *Construction Impacts*

Construction activities would generate a variety of scraps and wastes during such phases as demolition and site grading. Generated construction waste would also include recyclables such as wood waste, drywall, metal, paper, and cardboard. Recycling of construction-related waste materials in compliance with AB 939 would substantially reduce this waste stream that would otherwise go to a local landfill. Since construction waste is temporary in nature, impacts would be considered less than significant, and no further discussion of this issue is required.

### *Operational Impacts*

As shown in Table IV.A-6, the proposed project would be expected to generate 140 pounds of solid waste a day. This would be far below the remaining allowable daily intakes of any of the landfills that can receive waste from the project site, including the Bradley, Sunshine Canyon, and Olinda Alpha landfills. Therefore, no adverse impact to local landfills would occur, and no further discussion of this issue is required.

**Table IV.A-6  
Proposed Project Solid Waste Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup> (pounds/ day)</b>	<b>Solid Waste Generation (pounds/day)</b>
Condominiums	35 du	4/du	140 lbs/day
Housekeeping Suites <sup>b</sup>	2 du	4/du	8 lbs/day
Total			148 lbs/day
<i>Source: Los Angeles Sports and Entertainment Complex DEIR for the LA CRA, March 1997.</i>			
<i><sup>b</sup> Assuming a worst case scenario.</i>			

*The project would not conflict with federal, state, and local statutes and regulations related to solid waste. Solid waste generated on-site would be disposed of in accordance with all applicable federal, State, and local regulations related to solid waste. No impact would occur, and no further discussion of this issue is required.*