



City of Los Angeles

Department of City Planning•Major Projects/EIR Analysis Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY

WEST LOS ANGELES COMMUNITY PLAN AREA

Trident Center Modernization Project

Case Number: ENV-2016-1463-EIR

Project Location: 11355 and 11377 West Olympic Boulevard, Los Angeles, California

Council District: 11 – Mike Bonin

Project Description: The Project would modernize, expand, and reconfigure an existing office complex. The Project Site is approximately 3.6 acres in size and is bounded by Purdue Avenue, Mississippi Avenue, Corinth Avenue, and W. Olympic Boulevard. The existing buildings on the site consist of two 10-story office towers connected by a parking structure that includes 3 levels of above-grade and 2 levels of subterranean parking. The Project involves the redesign of the existing office buildings, including the horizontal expansion and connection between the two existing towers; updated outdoor and recreational amenities including roof gardens and an outdoor recreation deck; and pedestrian improvements along Olympic Boulevard including ground floor dining amenities. Approximately 115,000 gross square feet of office space, 5,000 gross square feet of restaurant uses and 125,199 gross square feet of open space area would be added. The Project does not propose to demolish or expand the existing subterranean parking garage and thus would not increase the number of existing parking spaces.

The Project Site is located within the West Los Angeles Community Plan Area and the West Los Angeles Transportation Improvement and Mitigation Specific Plan and is currently zoned [Q] C2-1 (General Commercial). The Project Applicant is seeking a General Plan Amendment to amend the West Los Angeles Community Plan Footnote Number 1 to allow Height District 2 for the site; a Height District Change and Zone Change to Height District 2; and amend the existing “Q” Conditions. The Project Applicant is also seeking a Major Development Project Conditional Use Permit, Site Plan Review, and a Vesting Tentative Tract Map. In addition, other approvals and permits from the Department of City Planning, Department of Building and Safety, and other municipal agencies may be necessary for construction of the Project.

APPLICANT:

Westside Campus Owner LLC
11355 West Olympic Boulevard
Los Angeles, CA 90064

PREPARED BY:

Meridian Consultants LLC
910 Hampshire Rd., Ste. V
Westlake Village, CA 91361

ON BEHALF OF:

City of Los Angeles
Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

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1.0 INTRODUCTION

PROJECT INFORMATION

Project Title: Trident Center Office Modernization Project

Project Location: 11355 and 11377 West Olympic Boulevard

Project Applicant: Westside Campus Owner LLC
11355 West Olympic Boulevard
Los Angeles, CA 90064

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

PROJECT SUMMARY

The subject of this Initial Study is the redevelopment of the existing Trident Center office buildings located at 11355 and 11377 West Olympic Boulevard, Los Angeles, California (“Project Site”). The existing buildings on the site consist of two 10-story office towers connected by a 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking).

The Project involves the reconfiguration and expansion of the existing buildings’ floor plates; the addition of five horizontal bridging floors on the second, third, fifth, seventh, and ninth floors connecting the two 10-story towers; the incorporation of roof gardens and outdoor amenities on the sixth, eighth, and tenth floors; construction of a new outdoor recreation deck and the addition of ground-floor restaurant uses. The Project would incorporate current planning and transit-oriented principles by creating a mixed-use development and introducing restaurant uses to the Project Site and providing outdoor seating along Olympic Boulevard. Approximately 115,000 gross square feet of office space, 5,000 gross square feet of restaurant uses and 125,199 gross square feet of open space area would be added to the existing office complex. The Project does not propose to demolish or expand the existing subterranean parking garage and thus would not increase the number of existing parking spaces.

The Project Site is located within the West Los Angeles Community Plan Area and the West Los Angeles Transportation Improvement and Mitigation Specific Plan and is currently zoned [Q] C2-1 (General Commercial). The Project Applicant is seeking a General Plan Amendment and Zone Change to amend the

Community Plan Footnote Number 1 and approve Height District 2 for the Project Site. In addition, the Project Applicant is requesting that the following "Q" Conditions be revised:

- No. 1 "The total floor area of all buildings constructed on the total ownership shall not exceed 359,000 square feet, a such total floor area is determined in Section 12.21.1 of the Los Angeles Municipal Code (LAMC)."
- No. 4 "All buildings shall observe a minimum setback of 30 feet from Olympic Boulevard."
- No. 9 "A minimum of 1,381 off-street parking spaces shall be provided; however, the parking provided shall not be less than one space for each 260 square feet of combined gross floor area of all buildings on the total ownership, as such total floor area is determined in Section 12.21 of the LAMC."

The Project Applicant is also seeking a Major Development Project Conditional Use Permit for a nonresidential addition of over 100,000 square feet, Site Plan Review, and a Vesting Tentative Tract Map.

PURPOSE OF INITIAL STUDY

The California Environmental Quality Act (CEQA) requires state and local agencies to identify potential significant environmental impacts of their actions and where possible avoid or mitigate those impacts. This Initial Study is a preliminary analysis of the Project prepared by and for the City of Los Angeles, the Lead Agency, to determine whether an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) must be prepared for the Project. This Initial Study is an informational document, and its preparation and distribution by the City neither presupposes nor mandates any action on the part of the City, or other agencies from whom permits and other discretionary approvals would be sought, with respect to the Project. In accordance with the analysis contained in this Initial Study, the City concludes that there is evidence that the Project could cause a significant environmental effect; therefore, an EIR shall be prepared.

ORGANIZATION OF INITIAL STUDY ANALYSIS

This Initial Study is organized into six sections as follows:

Section 1.0, Introduction, provides introductory information such as the Project title, the Project Applicant, and the Lead Agency for the Project.

Section 2.0, Environmental Setting, describes the existing conditions, surrounding land use, general plan, and existing zoning in the Project Site.

Section 3.0, Project Description, provides a detailed description of the Project, including the project characteristics, related project information, project objectives, and environmental clearance requirements.

Section 4.0, Environmental Analysis, includes an analysis for each resource topic and identifies the impacts of implementing the Project.

Section 5.0, References, identifies all printed references and individuals cited in this Initial Study.

Section 6.0, List of Preparers, identifies the individuals who prepared this report and their areas of technical specialty.

2.0 ENVIRONMENTAL SETTING

PROJECT LOCATION

The Project Site is approximately 0.15 miles west of the San Diego Freeway (Interstate 405 [I-405]) as shown in **Figure 2.0-1, Project Location Map**. The Project Site is bounded by W. Olympic Boulevard, Purdue Avenue, Mississippi Avenue, and Corinth Avenue.

SITE CONDITIONS

The Project Site is approximately 3.6 acres (156,290 sq. ft.) in size and consists of the following addresses: 11355 and 11377 West Olympic Boulevard (Assessor's Parcel Number 4260003008). The Project Site is zoned [Q] C2-1 (General Commercial). As shown in **Figure 2.0-2, Aerial Photograph of the Project Site**, the Project Site is currently developed with two 10-story office buildings and a 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The floor plates of the two towers vary in size from approximately 16,000 to 18,000 square feet. The existing buildings contain a total of approximately 342,000 gross square feet. The parking structure contains 1,381 parking stalls. Vehicular access to the driveways is provided along Purdue Avenue and Corinth Avenue. The roof of the parking structure features approximately 45,500 square feet of recreational space, including a basketball court, two tennis courts, and other passive open space.

SURROUNDING LAND USES

The land uses within the vicinity of the Project Site are developed with a mix of multi and single-family residential uses, commercial uses, and restaurants.

West:¹ The Project Site is bounded by Purdue Avenue on the west. Across Purdue Avenue are multifamily residences and a church at the corner of W. Olympic Boulevard. Properties to the west are zoned R2-1 and C2-1 and designated Low Medium I Residential and General Commercial, respectively.

East: The Project Site is bounded by Corinth Avenue on the east. Across Corinth Avenue are multifamily residences, as well as a bank and associated surface parking. Properties to the east are zoned R2-1 and C2-1VL and designated Low Medium I Residential and Neighborhood Commercial, respectively.

North: North of the Project Site are multifamily residences located across Mississippi Avenue. Properties to the north are zoned R2-1 and designated Low Medium I Residential.

¹ Directional references have been simplified (i.e., Purdue Avenue actually borders the Project Site to the southwest but is described herein as to the west).

South: The Project Site is bounded by W. Olympic Boulevard on the south. Properties on the south side of Olympic Boulevard consist of low- to medium-rise office buildings; industrial and commercial buildings; and surface parking lots. These properties are zoned M2-1 and designated Light Manufacturing.

ACCESS

Local street access to the Project Site is provided by the surrounding grid roadway system. Freeway access to the area is from the Santa Monica Freeway (I-10) and the I-405. The I-10 runs in an east–west direction south of the Project Site and the I-405 runs in a north–south direction east of the Project Site.

The Los Angeles County Metropolitan Transportation Authority (Metro) and the City of Santa Monica Big Blue Bus (BBB) provide public transit service to the Project area. Bus Route BBB5 runs along Olympic Boulevard with a stop in front of the Project Site. Both Metro and Santa Monica buses travel along Pico Boulevard, a quarter mile south of the Project Site, and Santa Monica Boulevard, three-quarters of a mile north of the Project Site. In addition, the Metro Expo Line Bundy light rail station is located three-quarters of a mile southwest of the Project Site and the Sepulveda light rail station is located three-quarters of a mile southeast of the Project Site.

REGULATORY FRAMEWORK

The Project Site is located within the West Los Angeles Community Plan Area of the City of Los Angeles. The Community Plan identifies goals and policies that promote development of distinctive commercial districts that establish street identity and character.² The Project Site is zoned [Q]C2-1 and is designated as General Commercial on the Community Plan’s Land Use Map.³ This commercial zoning classification permits a range of commercial uses at a density of 1.5:1 floor area ratio (FAR).⁴ **Figure 2-0-3, Land Use and Zoning Map**, depicts the Land Use and Zoning Designation of the Project Site and surrounding buildings.

The Project Site is also located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan (“Specific Plan”). The Specific Plan was adopted to implement goals of the West Los Angeles Community Plan and provisions of the Los Angeles Municipal Code, as well as to provide a mechanism to fund specific transportation improvements through Transportation Impact Assessment (TIA) fees.⁵

2 City of Los Angeles Department of City Planning, West Los Angeles Community Plan (1999), <http://planning.lacity.org/complan/pdf/wlacptxt.pdf>.

3 City of Los Angeles Department of City Planning, Parcel Profile Reports, Zoning Information and Map Access System (ZIMAS), <http://www.zimas.lacity.org>.

4 Summary Of Zoning, City Of Los Angeles (2006) http://planning.lacity.org/zone_code/Appendices/sum_of_zone.pdf.

5 City of Los Angeles Department of City Planning, West Los Angeles Transportation Improvement and Mitigation Specific Plan (1997), <http://planning.lacity.org/complan/specplan/pdf/wlatimp.pdf>.



SOURCE: Google Earth - 2015; Meridian Consultants,LLC - 2015

FIGURE 2.0-1



Project Location Map



SOURCE: Google Earth - 2015; Meridian Consultants, LLC - 2015

FIGURE 2.0-2

GENERALIZED ZONING

- OS, GW
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP
- CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL

GENERAL PLAN LAND USE

RESIDENTIAL

- Low Medium / Low Medium I Residential

COMMERCIAL

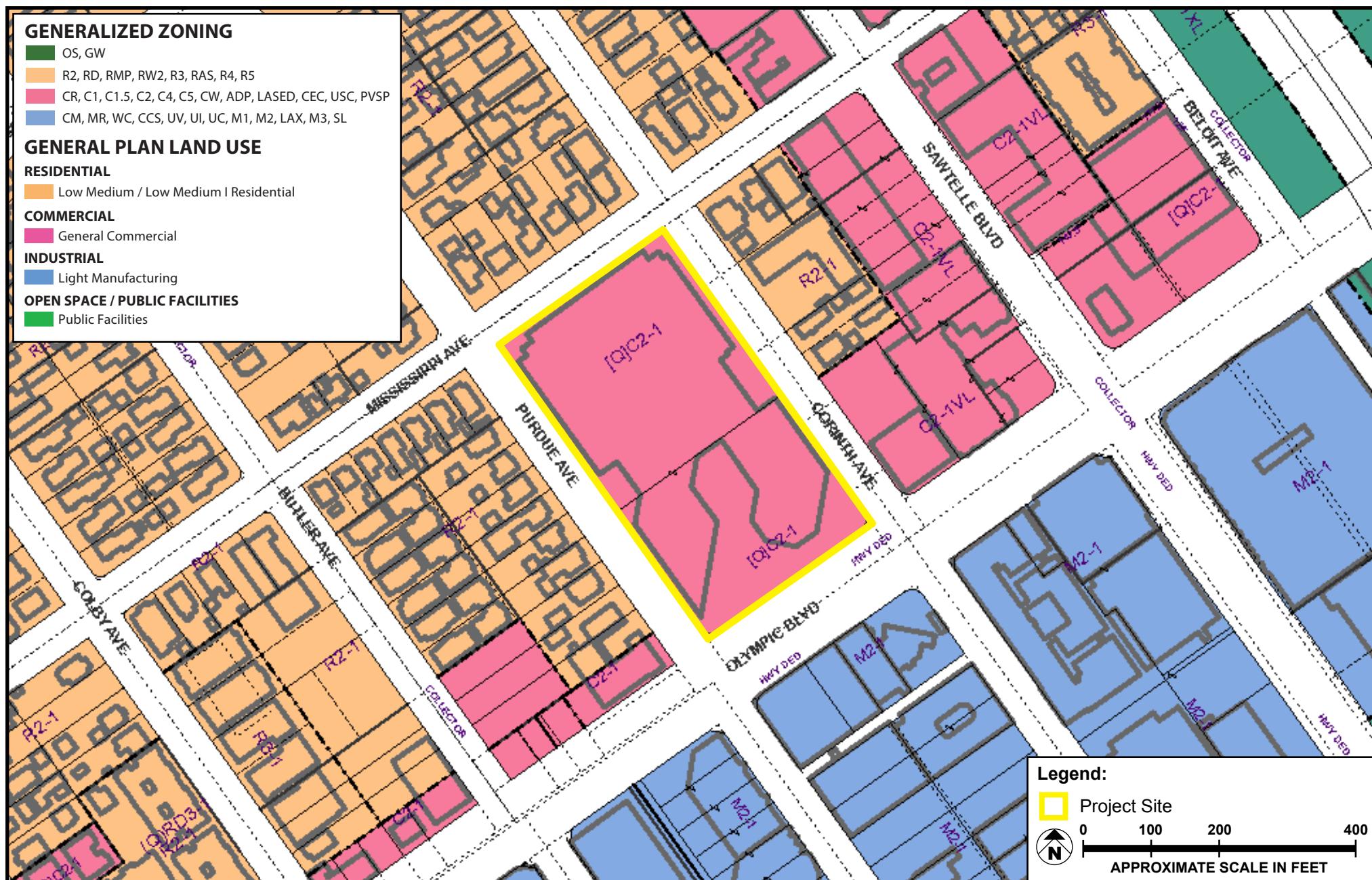
- General Commercial

INDUSTRIAL

- Light Manufacturing

OPEN SPACE / PUBLIC FACILITIES

- Public Facilities



SOURCE: City of Los Angeles, Zone Information and Map Access System (ZIMAS) - 2015

FIGURE 2.0-3

3.0 PROJECT DESCRIPTION

PROPOSED DEVELOPMENT

Program

The Project would modify the existing office complex through the reconfiguration and expansion of the existing buildings' floor plates ; the addition of five horizontal bridging floors on the second, third, fifth, seventh, and ninth floors connecting the two 10-story towers; the incorporation of roof gardens and outdoor amenities on the sixth, eighth, and tenth floors; construction of a new outdoor recreation deck; the addition of ground-floor restaurant uses; and incorporation of current planning and transit-oriented principles into the Project Site. Approximately 115,000 gross square feet of office space, 5,000 gross square feet of restaurant uses and 125,199 gross square feet of open space area would be added to the existing office complex. The Project does not propose an increase in the number of existing parking spaces. There would be no increase to the existing maximum building height; the maximum building height would be a maximum height of 158 feet.

As shown in **Figure 3.0-1, Conceptual Site Plan**, the towers building footprints would expand towards Olympic Boulevard. The proposed restaurant uses, including the outdoor dining areas would be located on the ground floor along Olympic Boulevard and would increase pedestrian activity in the area. **Figure 3.0-2, Trident Center Conceptual Illustration—View along W. Olympic Boulevard**, illustrates how the Project would create a new podium element that would link the two towers on floors one through three. The fourth level would feature a roof deck on top of the podium.

The parking structure would be retained; though the roof space would be redesigned, as shown in **Figure 3.0-3, Trident Center Conceptual Illustration—View along Mississippi Avenue**. Vehicular access and parking would remain unchanged. The number of floors would remain unchanged and, though slight changes would be made to the roof parapet of the towers, the height would remain the same as the existing buildings.

Design

The Project would be designed in a modern style. The existing buildings are clad with alternating horizontal bands of concrete and ceramic fritted vision glass. The Project would incorporate an architectural design with the emphasis on unique aesthetic enhancements, sustainable elements, increased energy efficiency, and seismic upgrades. Overall, the Project would create a reconfigured space while improving the exterior aesthetics, optimizing efficiency, amenities and planning flexibility of the office space.

Office Space

The Project would include several modifications to modernize the existing office complex, including additions to the total area of the two buildings; reconfiguration and expansion of existing building floor plates; the addition of horizontal bridges connecting the two 10-story towers on the fifth, seventh, and ninth floors; new roof gardens and terraces; and the creation of a new architectural identity through a new exterior facade curtain wall.

Landscaping and Open Space

The ground level space between the two towers would be redesigned with a new plaza that would serve as the main entry for the Project. The fourth level roof of the podium structure would be designed as a roof terrace with landscaping and seating. In addition, the roof of each connecting bridge would be a terrace amenity for tenants located on the sixth, eighth and tenth floors. The roof of the parking structure, currently a recreation deck, would be redesigned with new play courts and a multipurpose event lawn. In addition, new landscaping is proposed for the Purdue Avenue, Mississippi Avenue and Corinth Avenue perimeters of the site. These landscape elements would complement the surrounding uses and would provide continuity with existing buildings in the area.

Restaurant Use

The proposed ground floor space would provide an opportunity for a new restaurant tenant to be located along Olympic Boulevard. The restaurant use will include an outdoor dining area to improve the pedestrian environment.

Parking/Vehicle Access and Pedestrian and Transit Improvements

The existing parking structure and the vehicular access driveways along Purdue Avenue and Corinth Avenue would remain unchanged. The Project would incorporate various enhanced landscaping elements to activate the streetscape and integrate the Project Site with pedestrian activities. The frontage along W. Olympic Boulevard would provide open space for employees and visitors to socialize. Pedestrian access would be enhanced with new plaza space leading into the site from W. Olympic Boulevard.

Project Construction and Phasing

Construction would be managed in two phases: phase 1 would consist of the podium structure; phase 2 would consist of the tower improvements. Commencement is currently forecast to begin in 2018 with completion forecast for 2020.

REQUESTED DISCRETIONARY APPROVAL ACTIONS

To implement the Project, the Project Applicant requests approval of the following:

- A General Plan Amendment to revise Footnote 1 on the West Los Angeles Community Plan Land Use Map to indicate that Height District 2 would be applicable to the site;
- A Zone Change from Height District 1 to Height District 2;
- Revision of the existing Q Conditions, including nos. 1, 4, and 9 (Refer to **Section 1**);
- A Conditional Use Permit for Major Development Project for a nonresidential addition of more than 100,000 square feet; and
- A Site Plan Review.
- A Vesting Tentative Tract Map.

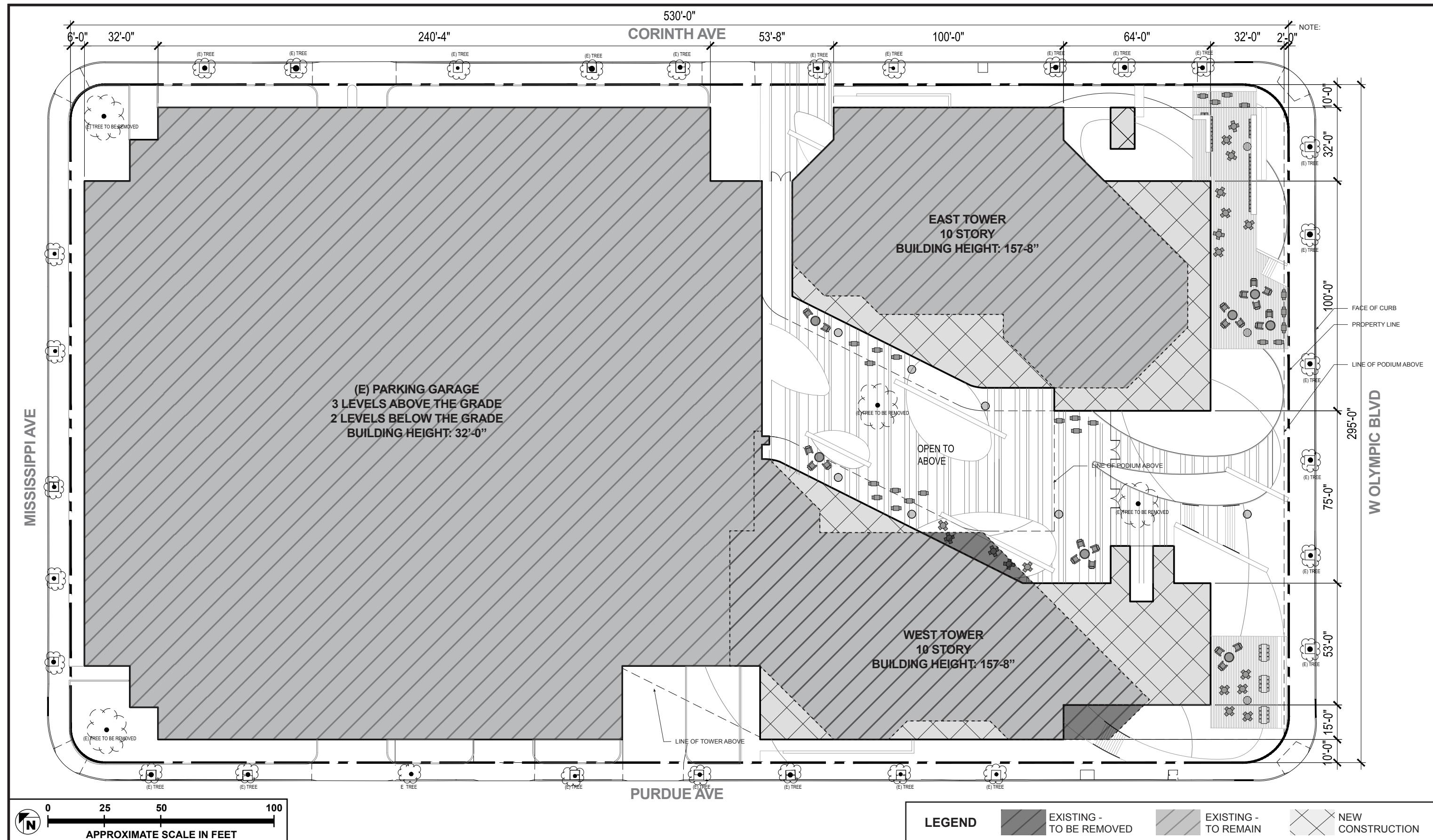


FIGURE 3.0-1



SOURCE: Gensler - 2015

FIGURE 3.0-2



SOURCE: Gensler - 2015

FIGURE 3.0-3

4.0 INITIAL STUDY AND CHECKLIST

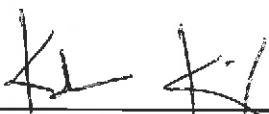
CITY OF LOS ANGELES
 OFFICE OF THE CITY CLERK
 ROOM 395, CITY HALL
 LOS ANGELES, CA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	COUNCIL DISTRICT: 11– Mike Bonin	DATE: January 20, 2017	
RESPONSIBLE AGENCIES: City of Los Angeles Department of City Planning			
PROJECT TITLE: Trident Center Modernization	ENVIRONMENTAL CASE: ENV-2016-1463-EIR	RELATED CASES:	
PREVIOUS ACTIONS CASE NO. ZA-1986-728-ZV, CPC-30293	<input checked="" type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.		
PROJECT DESCRIPTION: The Project would modify the existing office complex through the reconfiguration and expansion of the existing buildings' floor plates ; the addition of five horizontal bridging floors on the second, third, fifth, seventh, and ninth floors connecting the two 10-story towers; the incorporation of roof gardens and outdoor amenities on the sixth, eighth, and tenth floors; construction of a new outdoor recreation deck; the addition of ground-floor restaurant uses; and incorporation of current planning and transit-oriented principles into the Project Site. Approximately 115,000 gross square feet of office space, 5,000 gross square feet of restaurant uses and 125,199 gross square feet of open space area would be added to the existing office complex. The Project does not propose an increase in the number of existing parking spaces. There would be no increase to the existing building height of 158 feet. The Project Applicant is seeking a General Plan Amendment and a Zone Change to allow Height District 2 and revise the Project Site's existing Q Conditions. The Project Applicant is also seeking a Major Development Project Conditional Use Permit, Site Plan Review, and a Vesting Tentative Tract Map. In addition, other approvals and permits from the Department of City Planning, Department of Building and Safety, and other municipal agencies may be necessary for construction of the Project.			
ENVIRONMENTAL SETTING: The Project Site is approximately 3.6 acres in size and is bounded by Purdue Avenue, Mississippi Avenue, Corinth Avenue, and W. Olympic Boulevard. The Project Site is developed with two office towers and a parking structure. The Project Site is located in the West Los Angeles Community Plan Area. The land uses within the vicinity of the Project Site include a mixture of single and multi-family residential uses and commercial uses.			
PROJECT LOCATION: 11355 and 11377 West Olympic Boulevard, Los Angeles, California			
COMMUNITY PLAN AREA: West Los Angeles STATUS: <input type="checkbox"/> Preliminary <input type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Does NOT Conform to Plan <input checked="" type="checkbox"/> ADOPTED in 1999		AREA PLANNING COMMISSION: West Los Angeles	CERTIFIED NEIGHBORHOOD COUNCIL: West Los Angeles
EXISTING ZONING: [Q] C2-1	MAX DENSITY ZONING: 1.5:1	LA River Adjacent: No	
GENERAL PLAN LAND USE: General Commercial	MAX. DENSITY PLAN: 1.5:1	PROPOSED PROJECT DENSITY: 3:1	

Determination (To be completed by Lead Agency)**On the basis of this initial evaluation:**

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- 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

Planning Assistant

Title

213-978-1195

Phone

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

<input type="checkbox"/> AESTHETICS	<input checked="" type="checkbox"/> GREENHOUSE GAS EMISSIONS	<input type="checkbox"/> POPULATION AND HOUSING
<input type="checkbox"/> AGRICULTURE AND FOREST RESOURCES	<input type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS	<input type="checkbox"/> PUBLIC SERVICES
<input checked="" type="checkbox"/> AIR QUALITY	<input type="checkbox"/> HYDROLOGY AND WATER QUALITY	<input type="checkbox"/> RECREATION
<input checked="" type="checkbox"/> BIOLOGICAL RESOURCES	<input checked="" type="checkbox"/> LAND USE AND PLANNING	<input checked="" type="checkbox"/> TRANSPORTATION AND TRAFFIC
<input type="checkbox"/> CULTURAL RESOURCES	<input type="checkbox"/> MINERAL RESOURCES	<input checked="" type="checkbox"/> TRIBAL CULTURAL RESOURCES
<input type="checkbox"/> GEOLOGY AND SOILS	<input checked="" type="checkbox"/> NOISE	<input checked="" type="checkbox"/> UTILITIES
		<input checked="" type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE

INITIAL STUDY CHECKLIST BACKGROUND

PROPOSER NAME: Westside Campus Owner LLC

APPLICANT ADDRESS: 11355 W. Olympic Boulevard, Los Angeles CA 90064

AGENCY REQUIRING CHECKLIST: City of Los Angeles
Department of City Planning
Major Projects Division

DATE SUBMITTED: January 20, 2017

PROPOSAL NAME (If Applicable): Trident Center Modernization

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.				
1. AESTHETICS				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. AGRICULTURE AND FOREST RESOURCES				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3 AIR QUALITY				
a. Conflict with or obstruct implementation of the SCAQMD or congestion management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
4 BIOLOGICAL RESOURCES				
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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
c.	Have a substantial adverse effect on 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
5 CULTURAL RESOURCES				
a.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>
d.	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>
6 GEOLOGY AND SOILS				
<i>Would the project:</i>				
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:			

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to division of mines and geology special publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in table 18-1-b of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

7 GREENHOUSE GAS EMISSIONS*Would the project:*

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

8 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
d.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

9 HYDROLOGY AND WATER QUALITY*Would the project:*

a.	Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

10 LAND USE AND PLANNING*Would the project:*

a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

11 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally--important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

12 NOISE*Would the project:*

a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13 POPULATION AND HOUSING				
<i>Would the project:</i>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14 PUBLIC SERVICES				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
16 TRANSPORTATION AND TRAFFIC				
<i>Would the project:</i>				
a.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17 TRIBAL CULTURAL RESOURCES				
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>				
a.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
18 UTILITIES & SERVICE SYSTEMS				
<i>Would the project:</i>				
a.	Exceed wastewater treatment requirements of the applicable regional water quality control board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, California Code of Regulations, Title 14, Chapter 3, Sections 15000–15387). The thresholds of significance are based on the *L.A. CEQA Thresholds Guide*.⁶

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less than Significant with Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063 (c)(3)(D)). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

6 City of Los Angeles, *L.A. CEQA Thresholds Guide* (2006).

4.1 AESTHETICS

Senate Bill (SB) 743, effective January 1, 2014, deems the aesthetic impacts of residential, mixed-use and employment center infill projects located in defined transit priority areas (TPA) as less than significant under CEQA. Zoning Information File (ZI) No. 2451⁷ issued by the City of Los Angeles Department of City Planning, as well as the Department's Great Street Challenge map⁸ identifies the Project Site as within a TPA. Therefore, any aesthetic impacts, including but not limited to (a) adverse effects on scenic vistas, (b) damage to scenic resources, (c) degradation of existing visual character, (d) light and/or glare, and (e) shade shadow are deemed less than significant as a matter of law. Notwithstanding the mandate imposed by SB 743, the following aesthetic analysis of the Project is provided for informational purposes only.

a. *Would the project have a substantial adverse effect on a scenic vista?*

Less than Significant Impact. A significant impact could occur for non-SB 743 projects if the Project introduced incompatible visual elements within a field of view containing a scenic vista or substantially blocked views of a scenic vista. The Project Site is located in the West Los Angeles Community Plan Area, in an urbanized area of the City of Los Angeles. The Project Site is approximately 0.2 miles west of Interstate-405 (I-405) and approximately 0.5 miles north of Interstate-10 (I-10). Views surrounding the Project Site are generally urban in character and defined by low- to medium-rise commercial, industrial, and residential buildings.

Scenic views are typically defined as those that provide expansive views of a highly valued landscape for the benefit of the general public. The Project Site is not located within or along a designated scenic corridor, and no scenic views exist from the currently developed site. The nearest scenic view/vista to the Project Site are the Santa Monica Mountains, located approximately 7 miles northwest of the site, and the Pacific Ocean, approximately 4 miles west of the Project Site.

The Project would reconfigure and expand the existing building floor plates and add elements such as a podium and bridges connecting the two towers. While these changes would alter the visual character of the site, they would not substantially alter the views of the surrounding area. Impacts would be less than significant, and no further evaluation is required in an EIR.

⁷ City of Los Angeles Department of City Planning Zoning Information File ZI NO. 2451, <http://planning.lacity.org/eir/SunsetSilverLake/DEIR/DRAFT%20Appendices/J.%20ZI%20No.%202451.pdf>.

⁸ City of Los Angeles Department of City Planning Great Streets Challenge Map, Transit Priority Area layer, <https://ladcp.maps.arcgis.com/apps/webappviewer/index.html?id=02d509dfe1ea458da1157b516249f4d9>.

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

Less than Significant Impact. A significant impact could occur for non-SB 743 projects if scenic resources would be damaged and/or removed by the development of a project. The Project Site is not located near a designated scenic highway.⁹ None of the surrounding roadways are identified as a scenic highway in the West Los Angeles Community Plan.¹⁰ Currently, a short portion of the Pasadena Freeway (also known as the Arroyo Seco Historic Parkway) is the only scenic highway officially designated by the California Department of Transportation (Caltrans) located in the City.¹¹

The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). No unique geologic features, rock outcroppings, or historic buildings are located on the Project Site. The Project Site contains various ornamental landscaping that would be removed and replaced by new landscaping as part of the Project. As such, the Project would not substantially damage scenic resources. Impacts would be less than significant, and no further evaluation is required in an EIR.

c. *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

Less than Significant Impact. A project could have a significant impact for non - SB 743 projects if it were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area.

The Project Site is currently developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The existing buildings are clad with alternating horizontal bands of concrete and ceramic fritted vision glass. The Project Site is surrounded by light manufacturing, general and neighborhood commercial, and low- and medium-density residential uses.

The Project would modify the profile and footprint of the buildings, extending the building footprints towards Olympic Boulevard. However, no changes would be made to the buildings' maximum height of 158 feet. The exterior design of the buildings would incorporate current planning principles to create more active streetscapes and public spaces along with current energy-efficient facades. Implementation of the Project would modernize the two office tower buildings by replacing the buildings' façade with state of

9 City of Los Angeles General Plan, "Mobility Plan 2035" (August 2015)

10 City of Los Angeles West Los Angeles Community Plan, <http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf>, page III-27, accessed October 12, 2016.

11 State of California Department of Transportation, California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed October 12, 2016.

the art glazing. In addition, the ground floor outdoor dining areas, ground floor plaza, and first and second floor podium along Olympic Boulevard would create a more pedestrian friendly environment, compared to existing conditions.

The surrounding buildings located in the Project area vary in age and architectural style from more contemporary office buildings along Olympic Boulevard, to single and two-story residences to the north. The Project would be consistent with the existing modern office buildings located in the immediate vicinity of the site. The Project's 3 story podium would soften the building scale along Olympic Boulevard and the parking garage planters would be re-landscaped to mask the 3 levels of above grade parking. Furthermore, street trees would be planted along the public right away and portions of the main entrance would be landscaped, to enhance the visual character of the site at the ground level. As such, the Project would not detract from the aesthetic quality of the surrounding area. Impacts would be less than significant, and no further evaluation is required in an EIR.

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

Less than Significant Impact. A significant impact could occur for non – SB 743 projects if a project were to introduce new sources of shadow, light or glare that would be incompatible with the surrounding area or that pose a safety hazard. The Project Site is currently developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would not increase the two buildings maximum height of 158 feet, but would update the existing horizontal bands of concrete and ceramic fritted vision glass that make up the buildings' facade. In addition, a total of 115,000 gross square feet of new office space, 5,000 gross square feet of restaurant uses and 125,199 gross square feet of open space area would be constructed on the site.

Shade/Shadow

The analysis of a project's potential shade/shadow impacts focuses on changes in shading conditions for those off-site sensitive uses and activities that are dependent on access to natural light. As discussed above, the height of the buildings would not change and would remain a maximum of 158 feet. As such, there would be no change in the extent of shade cast by the buildings after completion of the Project, as compared to existing conditions. As a result, impacts would be less than significant, and no further evaluation is required in an EIR.

Glare

Under the Project, a majority of the buildings' skin would be comprised of glass. Non-reflective glazing finishes and high performance coatings would be applied to the glass surface to minimize glare. In addition, the Project would implement and comply with Project Design Feature (PDF) 4.1-1 below. As a result, impacts would be less than significant, and no further evaluation is required in an EIR.

PDF 4.1-1: Glass used in building facades shall minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

Artificial Light

The Project Site is located in a well-lit urban portion of the City where high levels of ambient nighttime lighting are present, including street lighting, vehicle lights, architectural and security lighting, and indoor building illumination (light emanating from the interior of structures that passes through the windows), all of which are common to densely populated areas. The two existing 10-story office buildings and associated parking structure contribute sources of artificial light on the Project Site. The Project would alter the nighttime illumination of the site. However, all lighting would be designed to comply with the City standards as outlined in LAMC Section 93.0117. As a result, impacts would be less than significant, and no further evaluation is required in an EIR.

4.2 AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. The Project Site is currently developed with an office complex and is surrounded by multifamily and single-family residences, office buildings, a church, industrial and commercial buildings, and surface parking lots. The Project Site is located within a developed, urbanized area of the City. No farmland or agricultural activity exists on or near the Project Site. No portion of the Project Site is designated as “Farmland of Statewide Importance,” “Unique Farmland,” or “Farmland of Local Importance.”¹² The Project Site and surrounding development are not currently used for agricultural use. No impact would occur, and no further evaluation is required in an EIR.

- b.** *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. The Project Site and surrounding development are currently not used for agricultural use, nor can they support agricultural use. The Project Site is not designated or zoned for agricultural use or subject to a Williamson Act contract. No designated agricultural land uses or Williamson Act contracts are in use adjacent to or near the Project Site.¹³ No impact would occur, and no further evaluation is required in an EIR.

- c.** *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

No Impact. The Project Site is located in the West Los Angeles Community Plan Area and zoned [Q] C2-1 (Commercial Zone). The General Plan land use designation for the site is General Commercial. The Project Site is not designated or zoned for forest or timberland or used for forestry. As stated previously, the Project Site is located in a developed area of the City and is surrounded by multifamily and single-family residences, office buildings, a church, industrial and commercial buildings, and surface parking lots. Thus,

¹² State of California Department of Conservation Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County 2010 Important Farmland, Map, file:///C:/Users/348147/Downloads/los14.pdf, accessed October 12, 2016.

¹³ California Department of Conservation, Division of Land Resource Protection, “The Land Conservation (Williamson) Act” (2013), <http://www.conservation.ca.gov/dlrc/lca/Pages/Index.aspx>.

implementation of the Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impacts would occur, and no further evaluation is required in an EIR.

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

No Impact. See response to **Section 4.2(c)**, above.

The Project Site is not designated or zoned for forest or timberland or used for forestry. Additionally, the Project Site is in an urbanized area of the City and is not within any forestland area. No impacts would occur, and no further evaluation is required in an EIR.

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

No Impact. See response to **Section 4.2(a) and (b)**, above.

Neither the Project Site nor nearby properties are currently utilized for agricultural or forestry uses. The Project Site is not classified in any “Farmland” category designated by the State of California. No impact would occur and no further evaluation is required in an EIR.

4.3. AIR QUALITY

- a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?***

Potentially Significant Impact. A significant air quality impact could occur if a project were not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (“Basin”), the applicable plan is the AQMP, which is prepared by the South Coast Air Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary. The Project Site is located in the Basin. The Project’s demolition, construction, and operational activities would generate pollutant emissions. Thus the Project would have the potential to conflict with the SCAQMD’s current AQMP. Further study is needed to determine the significance of these potential impacts. This issue will be evaluated in an EIR.

- b. *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?***

Potentially Significant Impact. A project could have a significant impact if project-related emissions were to exceed federal, state, and/or regional thresholds, or substantially contribute to an existing or projected air quality violation. The Project would increase the existing office space by 115,000 gross square feet and result in an additional 5,000 gross square feet of restaurant uses. As previously stated, the Project Site is located in the Basin, which is currently in attainment under the California ambient air quality standards (AAQS) for Carbon monoxide, Nitrogen dioxide, Sulfur dioxide, Hydrogen Sulfide (H_2S), Sulfates, Vinyl Chloride, but is in nonattainment (under the California AAQS) for Ozone, PM 10, and PM2.5. Further, under the National AAQS the Basin is in attainment for Carbon Monoxide, Nitrogen dioxide, Sulfur dioxide, and PM 10, but is in nonattainment for Ozone, PM2.5, and in certain areas Lead.¹⁴ The Project would contribute to regional and localized air pollutant emissions during construction and Project operation. Further study is needed to determine the significance of these potential impacts. This issue will be evaluated in an EIR.

¹⁴ South Coast Air Quality Management District, *National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin*, February 2016.

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

Potentially Significant Impact. A significant impact could occur if a project were to add a considerable cumulative contribution to federal or state nonattainment pollutants. In regards to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then development and operation of the project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As previously stated, the Project Site is located in the Basin, which is currently in attainment under the California AAQS for Carbon monoxide, Nitrogen dioxide, Sulfur dioxide, Hydrogen Sulfide (H_2S), Sulfates, Vinyl Chloride, but is in nonattainment for Ozone, PM 10, and PM2.5. Under the National AAQS the Basin is in attainment under the National AAQS for Carbon Monoxide, Nitrogen dioxide, Sulfur dioxide, PM 10, but is in nonattainment under NAAQS for Ozone, PM2.5, and in certain areas Lead.¹⁵ The Project could contribute to a cumulative increase in these pollutants during construction or operation. Further study is needed to determine the significance of these potential impacts. This issue will be evaluated in an EIR.

- d. ***Would the project expose sensitive receptors to substantial pollutant concentrations?***

Potentially Significant Impact. Project construction activities and operations would generate air pollutants. Sensitive receptors are defined as schools, residential homes, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions which would be adversely impacted by changes in air quality. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction and operation of the Project are the single and multi-family residential units to the north and west, a church adjacent to the site, and several

¹⁵ South Coast Air Quality Management District, *National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin*, February 2016

schools. Further study of emissions is needed to determine the significance of these potential impacts. This issue will be evaluated in an EIR.

e. *Create objectionable odors affecting a substantial number of people?*

Less than Significant Impact. A significant impact would occur if objectionable odors were generated that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Project does not involve elements related to these types of activities; therefore, no substantial odors are anticipated.

During the construction phase, activities associated with the operation of construction equipment, the application of asphalt, and the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable. Although these odors could be a source of nuisance, they are temporary and intermittent in nature. Furthermore, during operation the Project would continue to implement maintenance practices on the Project Site, such as the use of trash receptacles. All trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by the City and the Los Angeles County Health Department regulations, to prevent nuisance odors at the surrounding land uses. Impacts would be less than significant, and no further evaluation is required in an EIR.

4.4 BIOLOGICAL RESOURCES

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

Less than Significant Impact. A significant impact would occur if the Project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the state or federal regulatory agencies cited above. The site is not located near any vacant land with natural vegetation supportive of sensitive species.¹⁶ Given the developed nature of the Project Site and the surrounding area, species likely to occur on site are limited to small terrestrial and avian species typically found in developed settings. Impacts would be less than significant, and no further evaluation is required in an EIR.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally or regionally, or by the state and federal regulatory agencies cited above, were to be adversely modified by the Project. The Project Site is currently developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). No riparian habitat or any other sensitive natural community exists on or around the Project Site. Thus, implementation of the Project would not result in impacts to riparian habitat and/or other sensitive natural communities identified in local or regional plans, policies, and/or regulations as identified by the California Department of Fish and Wildlife or the US Fish and Wildlife Service. No impact would occur and no further evaluation is required in an EIR.

¹⁶ City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, <http://planning.lacity.org/cwd/gnlpn/consvolt.pdf>, accessed October 13, 2016.

c. Would the project 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. A project could have a significant impact on biological resources if it were to result in the alteration of an existing wetland habitat. The Project Site does not contain and is not near wetland habitat or a blue-line streams.¹⁷ Implementation of the Project would not have a substantial significant impact on federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) through direct removal, filling, hydrological interruption, or other means. No impact would occur and no further evaluation is required in an EIR.

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?

Less than Significant Impact. A significant impact could occur if a project were to interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is located in an urbanized area of the City and is currently developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). While the Project Site contains trees, bushes, and ground cover, the Project Site is not an established wildlife corridor or nursery site. Although the existing vegetation is mainly ornamental, they could provide habitat, including nesting habitat, for migratory birds. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. The Project Applicant will be required to comply with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. Therefore, impacts would be less than significant. No further evaluation is required in an EIR.

¹⁷ US Fish and Wildlife Service, National Wetlands Inventory, Wetland Mapper, <https://www.fws.gov/wetlands/data/mapper.html>, accessed October 13, 2016.

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

Potentially Significant Impact. A project-related, significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources. The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as protected by the City. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety. The Project site contains several trees, specifically in the plaza space along Olympic and on the roof of the parking structure. The species and condition of these trees has not been identified. A tree inventory report will be completed for the Project Site. As such, impacts could be potentially significant and this issue will be further addressed in an EIR.

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

No Impact. The Project Site is located in an urbanized area of the City and is not located in any Habitat Conservation Plan, Natural Community Conservation Plan, or other related plans¹⁸. Implementation of the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any approved local, regional, or State habitat conservation plan. No impact would occur and no further evaluation of this issue is required in an EIR.

¹⁸ City of Los Angeles General Plan, Conservation Element, accessed November 29, 2016.

4.5 CULTURAL RESOURCES

- a. ***Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?***

No Impact. Section 15064.5 of the State CEQA Guidelines defines historical resources as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A Project-related significant adverse effect would occur if the Project were to adversely affect a historical resource meeting one of the above definitions. Furthermore, the State Office of Historic Preservation recommends that properties more than 45 years of age be evaluated for their potential as historic resources.

The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project Site is not located in a City designated Historic Preservation Overlay Zone and does not contain any site, building, or structure listed as a Los Angeles Historic-Cultural Monument (HCM).^{19,20} The structures were constructed in 1983 and thus do not meet the State Office of Historic Preservation threshold that recommends properties that are at least 45 years old be evaluated as a historic resource. In addition, an evaluation conducted by an architectural historian concluded that the existing buildings on the site do not meet the CEQA definition of a historical resource.²¹

Three properties (2110, 2122, and 2126 S Corinth) that are along the east side of Corinth Avenue across from the Project Site, have been identified as historic resources.²² However, the Project would not alter or result in any change to these properties. Therefore, no impacts would occur and no further evaluation is required in an EIR.

19 City of Los Angeles Department of City Planning, Zoning Information Map Access System (ZIMAS), <http://zimas.lacity.org/>, accessed October 13, 2016.

20 City of Los Angeles Department of City Planning, [Survey LA: Historic Resources Survey Report West Los Angeles Community Plan Area, West Los Angeles Individual Resources](#) (August 2012)

21 [Historic Resource Evaluation Report, Trident Center 11355-11377 Olympic Boulevard, Los Angeles California](#), GPA Consulting, April 2016 as contained in **Appendix A** of this Initial Study.

22 City of Los Angeles Department of City Planning, [Survey LA: Historic Resources Survey Report West Los Angeles Community Plan Area, West Los Angeles Individual Resources](#) (August 2012).

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

Less than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which constitute unique archaeological resources. A significant impact could occur if grading or excavation activities associated with the Project would disturb archaeological resources that presently exist beneath the Project Site. The Project Site was previously graded and excavated for construction of the existing subterranean parking levels. The Project does not involve site clearance or new excavation. As such, the potential for the accidental discovery of archaeological materials is considered low. Furthermore, the Project Applicant would be required to comply with existing federal, state, and local regulations, including California Public Resources Code Section 21083.2 that specifies the protocol if archaeological resources are discovered during excavation, grading, or construction activities. If archaeological resources are unearthed during construction activities, work is required to cease in that location until a qualified archaeologist has evaluated the find in accordance Public Resources Code Section 21083.2. Compliance with the existing regulations would reduce any archeological impacts to a less than significant level. No further evaluation is required in an EIR.

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

Less than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features that presently exist beneath the Project Site. A significant impact could occur if grading or excavation activities associated with the Project were to disturb paleontological resources or geologic features beneath the Project Site. The Project Site was previously graded and excavated for construction of the existing subterranean parking levels. The Project does not involve site clearance or new excavation. As such, the potential for the accidental discovery of paleontological resources is considered low. The Project Applicant would be required to comply with existing federal, state, and local regulations, including California Public Resources Code Section 21083.2 that specifies required protocol if paleontological resources are discovered during excavation, grading, or construction activities. Therefore, compliance with the existing regulations would reduce any potential paleontological impacts to a less than significant level. No further evaluation is required in an EIR.

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

Less than Significant Impact. A project-related, significant adverse impact could occur if grading or excavation activities associated with a project would disturb previously interred human remains. The

Project Site was previously graded and excavated for construction of the existing subterranean parking levels. The Project does not involve site clearance or new excavation. The Project Applicant would be required to comply with existing federal, state, and local regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 that specify the protocol if human remains are discovered during excavation, grading, or construction activities. If human remains are encountered State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If the County Coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and disposition of the remains. Compliance with the existing regulations would reduce impacts to a less than significant level. No further evaluation is required in an EIR.

4.6 GEOLOGY AND SOILS

a. ***Would the project 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?**

Less than Significant Impact. A significant impact could occur if a project were located within a state-designated Alquist-Priolo Zone or other designated fault zone. No active or potentially active faults delineated as Alquist-Priolo Earthquake Fault Zones are known to be present beneath the Project Site.²³ The faults nearest to the Project Site are the Santa Monica and Newport-Inglewood Faults, which are approximately 1.2 miles north and 2.9 miles east, respectively.²⁴ Thus the potential risk for surface fault rupture through the Project Site is considered low. Impacts would be less than significant, and no further evaluation is required in an EIR.

- ii. **Strong seismic ground shaking?**

Less than Significant Impact. A significant impact could occur if a project were to represent an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground-shaking hazards that are greater than the average risk associated with other locations in Southern California. The intensity of ground shaking depends primarily on the earthquake's magnitude, the distance from the source, and the site response characteristics. The Project Site is located within the seismically active Southern California region and therefore could be subject to moderate and possibly strong ground motion due to earthquakes occurring on the surrounding faults.

The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area. The Project would also include seismic improvements that would bring the buildings into compliance with the current building code.

The design of the Project would comply with the current City of Los Angeles Building Code seismic standards and the International Building Code. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to

23 California Department of Conservation, "Alquist-Priolo Earthquake Fault Zone Maps," <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>, accessed on September 2015.

24 California Institute of Technology, Southern California Earthquake Data Center, "Significant Earthquakes and Faults," <http://scedc.caltech.edu/significant/>, accessed on September 2015.

seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Impacts would less than significant, and no further evaluation is required in an EIR.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

The Project Site is not located in an area susceptible to liquefaction.²⁵ Impacts would less than significant, and no further evaluation is required in an EIR.

iv. Landslides?

No Impact. The Project Site and surrounding areas are relatively flat and contain minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. According to the City's General Plan, the Project Site is not located within an area susceptible to landslide hazards.²⁶ Therefore, the Project would result in no impacts related to landslides. No further evaluation is required in an EIR.

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

Less than Significant Impact. A project could have significant sedimentation or erosion impacts if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition that would not be contained or controlled on site. The Project Site is located in an urbanized area that has been previously disturbed and developed. Further, the Project Site and surrounding area is relatively flat and contains minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). Under

25 USGS Beverly Hills Quadrangle

26 City of Los Angeles General Plan, Safety Element, Exhibit B, Areas Susceptible to Liquefaction (1996).

the Project, the buildings' footprints would be expanded to include 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area.

Although development of the Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of standard erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Because the Project Site is greater than 1 acre in size, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities.²⁷ The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in stormwater discharge. Typical BMPs that could be used during construction include good housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, stormwater inlet protection, soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's *Development Best Management Practices Handbook: Part A, Construction Activities*.²⁸

Due to the developed nature of the site, the potential for soil erosion during the ongoing operation of the Project is extremely low. A majority of the site would be developed with impervious surfaces and all stormwater flows would be directed to storm drains. Soil erosion impacts associated with construction and operation of the Project would be less than significant. No further evaluation is required in an EIR.

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

Less than Significant Impact. A project could have a significant geologic hazard impact if it would cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. As previously discussed, the Project Site is not located in a landslide zone and/or subject to liquefaction. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). As stated above, the Project would increase the buildings footprint to include 115,000 gross square feet of

27 <https://www.epa.gov/npdes/stormwater-discharges-construction-activities>

28 http://www.lastormwater.org/wp-content/files_mf/partA.pdf

office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area. The Project would not substantially alter the stability of the site. Construction of the Project would comply with the current City of Los Angeles Building Code and CBC. Impacts would be less than significant, and no further evaluation is required in an EIR.

d. *Would the project 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. A project could have a significant impact if the project were built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. When the existing buildings were built, the site was excavated, backfilled and compacted. All work was done in conformance with the requirements of the City Department of Building and Safety and the soil used in backfill was non-expansive.²⁹ The existing buildings (including the foundations) and subterranean parking garage would remain in place. In addition, the Project would comply with the City's Building Code and the CBC. Impacts would be less than significant, and no further evaluation is required in an EIR.

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

No Impact. The Project Site is located in a developed area of the City that is served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. The Project Site is currently connected to the City's existing sewer system. The Project does not propose the use of septic tanks or alternative wastewater disposal systems and would remain connected to the City's existing sewage system. Therefore, no impacts related to this issue would occur and no further evaluation is required in an EIR.

²⁹ *Interim Report of Inspection and Testing of Wall Backfill - Trident Center, RT Frankian & Associates, November 1, 1982 and Report of Foundation Investigation Proposed Olympic-Purdue Office Building, RT Frankian & Associates, January 8, 1982*

4.7 GREENHOUSE GAS EMISSIONS

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

Potentially Significant Impact. A significant impact would occur if a project were to generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. The Project would result in short-term GHG emissions during construction and long-term GHG emissions from automobiles and energy use during operation. Further study is needed to determine the significance of these potential impacts. This issue will be evaluated in an EIR.

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

Potentially Significant Impact. GHGs are addressed at the federal, state, and local level through a number of plans, policies, and regulations. State policies include AB32-California Global Warming Solutions Act of 2006, which established regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions; CARB's Climate Action Scoping Plan that proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health;" and SB375-Sustainable Communities and Climate Protection Act, which aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. At the local level, the City of Los Angeles has adopted the Green LA Action Plan which establishes targets for reducing GHG emissions in the City.

Because the Project would have the potential to emit GHG emissions, construction and operation of the Project would have the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This issue will be further addressed in an EIR.

4.8 HAZARDS AND HAZARDOUS MATERIALS

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

Less than Significant Impact. A significant impact could occur if a project were to create a significant hazard through the routine transfer, use, or disposal of hazardous materials. Construction activities would involve the use of typical materials, including vehicle fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. The transport, use, and/or disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing activities. Therefore, the Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction. Impacts would be less than significant.

The types and amounts of hazardous materials that would be used in connection with operation of the Project would be typical of those used on retail and office properties, such as cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products used in normal vehicles operations. These substances can be hazardous in high concentrations. However, all potentially hazardous materials would be used and stored in accordance with applicable federal, state, and local regulations. Thus, the potential for a significant hazardous impact to occur during operation of the Project is considered low. Impacts would be less than significant, and no further evaluation is required in an EIR.

- b.** *Would the project 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?*

Less than Significant Impact. A significant impact could occur if a project were to have a reasonably foreseeable chance to result in a substantial release of hazardous materials into the environment through accident or upset conditions. As discussed in **Section 4.8(a)** above, compliance with federal, state, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The existing structures were constructed in 1983, subsequent to the cessation of the use of asbestos-containing materials (ACMs), polychlorinated biphenyls (PCBs), and lead-based paint (LBP) in construction. Therefore, these hazards are not present on the Project Site.

The Project would improve the Project Site with additional office space and new restaurant uses. Operation of the office and restaurant space would not result in a substantial release and/or use of hazardous materials. Impacts would be less than significant, and no further evaluation is required in an EIR.

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

Less than Significant Impact. The closest school to the Project Site is the Japanese Institute of Sawtelle, located at 2110 Corinth Avenue, across the street from the Project Site. No hazardous materials other than modest amounts of typical cleaning supplies and solvents associated with office and restaurant uses, such as cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products, would be present on the Project Site. The use of these substances would comply with state health codes and regulations. As such, the Project would not create a significant hazard for the Japanese Institute of Sawtelle and/or any other schools located in the Project area, through the emissions or handling of hazardous or acutely hazardous materials. Impacts would be less than significant, and no further evaluation is required in an EIR.

d. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Less than Significant Impact. A significant impact could occur if a project site were included on any state list for hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, or solid waste facilities with known hazardous waste. The Project Site is not included on any state hazardous list.³⁰³¹ Furthermore, the Project would not exacerbate or create hazards to people on the site or the surrounding area. Impacts would be less than significant, and no further evaluation is required in an EIR.

30 Hazardous material sites as compiled by California Department of Toxic Substances Control, EnviroStor, <http://www.envirostor.dtsc.ca.gov/public/>, accessed January 2017.

31 Water quality impacts as compiled by State Water Resources Control Board, Geotracker, <https://geotracker.waterboards.ca.gov/>, accessed January 2014.

- 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?*

Less than Significant Impact. The closest public airport to the Project Site is the Santa Monica Municipal Airport, which is located approximately 1.1 miles to the southwest. While the Project Site is located within 2 miles of the Santa Monica Municipal Airport, the Project Site is not within the Airport's Influence Area.³² Further, the Project would not increase the height of the buildings. As such, the Project would not result in a safety hazard for people residing or working in the Project area. Impacts would be less than significant, and no further evaluation is required in an EIR.

- 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?*

Less than Significant Impact. See Section 4.8(e) above.

The Project Site is not within the vicinity of a private airstrip. Therefore, the Project would not expose people to additional safety hazards. Impacts would be less than significant, and no further evaluation is required in an EIR.

- g.** *Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. A significant impact could occur if a project were to interfere with an emergency response plan or emergency evacuation plan. The Project is located along West Olympic Boulevard and is approximately 0.2 miles west of I-405; both roadways are selected disaster routes as identified by the City's General Plan.³³ Construction of the Project may require partial lane closures of Purdue Avenue and Corinth Avenue. Such closures would be temporary and would be coordinated with the City of Los Angeles Departments of Transportation (LADOT), Building and Safety, and Public Works. In accordance with applicable permit requirements, for any construction activity that occurs within the right-of-way, the Project Applicant would be required to submit a formal Work Area Traffic Control Plan for review and approval by the City of Los Angeles Department of Building and Safety prior to the issuance of any construction permits. This plan would incorporate safety measures around the site to reduce the risk

³² Santa Monica Airport Influence Area Map, http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf.

³³ City of Los Angeles General Plan, Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles (1996).

to pedestrians and vehicle traffic near the work area. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Prior to the issuance of a building permit, the Project Applicant would develop an emergency response plan in consultation with the Los Angeles Fire Department (LAFD). The emergency response plan would include but not be limited to the following: mapping of emergency exits; evacuation routes for vehicles and pedestrians; and location of and routes to nearest hospitals and fire departments. Further, development of the Project would not result in the permanent alteration to the surrounding roadway network. Therefore, construction and operation of the project is not anticipated to significantly impair implementation of or physically interfere with any adopted emergency response or evacuation plan/ Impacts would be less than significant, and no further evaluation is required in an EIR.

h. Would the project 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 within a highly urbanized area of the City and does not include wildlands or high fire hazard terrain or vegetation. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.³⁴ Thus, no impacts related to this issue would occur. No further evaluation is required in an EIR.

³⁴ City of Los Angeles General Plan, Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles (1996).

4.9 HYDROLOGY AND WATER QUALITY

a. *Would the project violate any water quality standards or waste discharge requirements?*

Less than Significant Impact. A significant impact could occur if discharges associated with the Project would create pollution, contamination, or a 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 National Pollution Discharge Elimination Systems (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. Significant impacts could also occur if the Project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB).

During construction activities stormwater runoff from the Project Site could cause erosion and/or transport sediment off-site and into municipal storm drain systems. Thus, pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could result in significant impacts to water quality. As required under the NPDES, the Project would be responsible for the preparation of a SWPPP and implementation of BMPs to mitigate the effects of erosion and inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of the SWPPP and compliance with the NPDES and City discharge requirements would ensure that construction of the Project would not violate any water quality standards and/or discharge requirements, or otherwise substantially degrade water quality.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of office and restaurant uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking garage). Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with the LID Ordinance the Project would be required to capture and treat the first $\frac{3}{4}$ -inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Impacts would be less than significant. No further evaluation is required in an EIR.

- b.** *Would the project 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)?*

Less than Significant Impact. A project could have a significant impact on groundwater level if it would change potable water levels sufficiently to (a) 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 respond to emergencies or drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate of direction of flow of groundwater; or (d) result in demonstration and sustained reduction in groundwater recharge capacity.

The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area. A majority of the Project Site is developed with paved surface and thus does not afford any opportunity for groundwater recharge activities. Similar to existing conditions, implementation of the Project would result in a negligible amount of on-site groundwater recharge opportunities and would not impact a water utility's ability to use groundwater supplies, impact groundwater wells, change the rate of direction of flow of groundwater, or impact groundwater recharge areas. Impacts would be less than significant, and no further evaluation of this issue is required in an EIR.

- c.** *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

Less than Significant Impact. A significant impact would occur if a project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. The Project Site is located in a highly urbanized area of the City and no streams or river courses are located on or within the Project vicinity. As discussed above, the Project Site is developed with paved surfaces, and current stormwater runoff flows to the local storm drain system.

The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While construction activities may temporarily alter the

existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project construction activities.

In addition, the Project would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ -inch of rainfall in a 24-hour period. Therefore, the Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site. No further analysis is required in an EIR.

- d. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or 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. See Section 4.9(c) above.

A significant impact could occur if a project results in increased surface water runoff volumes during construction, or if operation of the Project would result in flooding conditions affecting the Project Site or nearby properties. Construction activities on the Project Site may temporarily alter the existing drainage patterns of the site and reduce off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site as compared to the existing conditions. Impacts would be less than significant and no further evaluation is required in an EIR.

- e. *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

Less than Significant Impact. A significant impact could occur if a project were to increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site, or if the Project were to introduce substantial new sources of polluted runoff. Runoff from the Project Site currently is, and would continue to be, collected on the site and directed toward existing storm drains in the Project vicinity. Currently, drains and catch basins maintained by the City are located along Olympic

Boulevard, adjacent to the Project Site's southern boundary.³⁵ Pursuant to local practice and City policies, stormwater retention would be required as part of the LID/SUSMP implementation features. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, pollutants from the subterranean parking garage would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to treat the first three-quarters inch of rainfall in a 24-hour period. Thus, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no further evaluation of this issue is required in an EIR.

f. *Would the project otherwise substantially degrade water quality?*

Less than Significant Impact. See **Section 4.9(a)** and **(e)** above.

A significant impact could occur if a project includes potential sources of water pollutants that could substantially degrade water quality. As discussed above, construction of the Project could potentially degrade water quality through erosion and subsequent sedimentation, however implementation of the site specific SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities would reduce impacts from erosion and sedimentation to a less than significant level.

Implementation of the site specific LID Plan would ensure the Project meets the City's water quality standards during operation of the Project. In addition, the Project would be subject to all federal, state, and local regulations governing stormwater discharge. Thus, Project impacts related to operational water quality would be less than significant. No further evaluation is required in an EIR.

g. *Would the project 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?*

No Impact. A significant impact would occur if a project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood resulting from a severe rainstorm that has a probability of occurring approximately once every 100 years. According to the Safety Element of the City of Los Angeles General Plan, the Project Site is not located within a designated flood zone.³⁶ The Project Site is

³⁵ Los Angeles County Department of Public Works. "Los Angeles County Storm Drain System." <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>

³⁶ City of Los Angeles General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles (1996).

located within designated flood area Zone X³⁷ as identified by the Federal Emergency Management Agency (FEMA).³⁸ Further, as the Project does not include a residential component, the Project would not place housing within a 100-year flood hazard area. No further evaluation is required in an EIR.

h. Would the project be placed within a 100-year flood hazard area structures, which would impede or redirect flood flows?

No Impact. The Project Site is located in a highly urbanized area, and no changes to the local drainage pattern would occur with implementation of the Project; therefore, the Project would not have the potential to impede or redirect floodwater flows. A significant impact could occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. According to the Safety Element of the City of Los Angeles General Plan the Project Site is not in an area designated as a 100-year flood hazard area.³⁹ The Project Site is located within designated flood area Zone X as identified by FEMA. Impacts would be less than significant, and no further evaluation of this issue is required in an EIR.

i. Would the project 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?

Less than Significant Impact. A significant impact could occur if a project exposes people or structure to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche.⁴⁰ The Project Site is located in an area mapped by the City of Los Angeles as susceptible to floods associated with failure of Stone Canyon Reservoir.⁴¹ However, the Project Site is approximately 4.8 miles from the reservoir and due to the intervening development, the risk of loss, injury or death is minimal. Impacts would be less than significant and no further evaluation is required in an EIR.

j. Would the project expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow?

Less than Significant Impact. A seiche is a periodic oscillation of a body of water resulting from seismic shaking or other causes that can cause flooding. The Project Site is located 4 miles east of the Pacific Ocean and is not located within a coastal area. Although the Stone Canyon Reservoir is located approximately 4.8 miles from the Project Site, as discussed above, the site is not susceptible to flooding associated with

³⁷ Zone X: Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

³⁸ Federal Emergency Management Agency (FEMA), Flood Map Service Center,

³⁹ City of Los Angeles General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles (1996).

⁴⁰ A seiche is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

⁴¹ City of Los Angeles General Plan, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles (1996).

the Reservoir. No water bodies are on or adjacent to the Project area that would impact future projects due to a seiche. Impacts would be less than significant.

A tsunami is a series of waves generated by large earthquakes that create vertical movement on the ocean floor. Tsunamis can reach more than 50 feet in height, move inland several hundred feet, and threaten life and property. Often, the first wave of a tsunami is not the largest. Tsunamis can occur on all coastal regions of the world, but are most common along margins of the Pacific Ocean. Tsunamis can travel from one side of the Pacific to the other in a day, at a velocity of 600 miles an hour in deep water. A locally generated tsunami may reach the shore within minutes. Due to its inland location, the Project Site is not susceptible to tsunamis. Impacts would be less than significant.

In addition, given the developed nature flat terrain of the Project area, there are no features adjacent to the Project area capable of inundating the site by mudflow. Thus, no impacts are anticipated with regard to the inundation by seiche, tsunami, or mudflow. No further analysis is required in an EIR.

4.10 LAND USE AND PLANNING

a. *Would the project physically divide an established community?*

No Impact. A significant impact could occur if construction and/or operation of a project would physically divide an established community. The Project Site is located in a highly urbanized area of the West Los Angeles Community Plan Area and is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area. The Project would not create a barrier and is consistent with the existing physical arrangement of the surrounding properties. No impacts would occur and no further evaluation is required in an EIR.

b. *Would the project 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

Potentially Significant Impact. The Project site is zoned [Q] C2-1 (Commercial). The General Plan land use designation for the Project Site is General Commercial. The Project would develop the Project Site with additional office and restaurant space and would require zoning and plan amendments to enable this. Specifically, the Project Applicant has requested that the City approved the following actions:

- A General Plan Amendment to revise Footnote 1 on the West Los Angeles Community Plan Land Use Map to indicate that Height District 2 would be applicable to the site;
- A Zone Change from Height District 1 to Height District 2 that would allow the proposed increase in FAR;
- Revision of the existing Q Conditions, including nos. 1, 4, and 9 that would remove specific limitation on the total floor area of buildings; the minimum setback from Olympic Boulevard; and the minimum parking.
- A Conditional Use Permit for Major Development Project for a nonresidential addition of more than 100,000 square feet.
- Site Plan Review; and
- A Vesting Tentative Tract Map.

Further study is needed to determine the significance of these changes and to document the relationship of the Project to applicable land use plans, policies, and regulations. As such, this topic shall be evaluated in an EIR.

c. *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

No Impact. See Section 4.4(f).

The Project Site is developed with an existing office complex and is located in an urbanized area of the City. The Project Site is not located in an area subject to any applicable habitat conservation plan or natural community conservation plan. No impacts would occur and no further evaluation is required in an EIR.

4.11 MINERAL RESOURCES

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

No Impact. A significant impact would occur if a project site was located in an area used or available for extraction of a regionally important mineral resource, if the project would convert an existing or future regionally important mineral extraction use to another use, or if a project would affect access to a site used or potentially available for regionally important mineral resource extraction. The Project Site is located in an urbanized part of the City. There are no known mineral resources on the Project Site or in the vicinity, nor would the Project disrupt any current mining operations. Thus, 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. No impacts would occur and no further evaluation is required in an EIR.

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

No Impact. See Section 4.11(a).

The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area.⁴² The Project Site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impacts would occur and no further evaluation is required in an EIR.

⁴² City of Los Angeles, Department of City Planning, General Plan Conservation Element, Exhibit A MINERAL RESOURCES (2001). <http://planning.lacity.org/cwd/gnlpn/conselt.pdf>.

4.12 NOISE

- a.** *Would the project result in 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. A significant impact would occur if a project were to generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise-level standards set forth in the City's General Plan Noise Element and Noise Ordinance. Implementation of the Project would result in an increase in ambient noise levels during both construction and operation.

Construction of the Project would require the use of heavy equipment for foundation work, paving, and building. While only temporary, noise associated with the Project's construction activities may significantly impact nearby sensitive uses, including residential units, a church, and school. Additionally, operation of the Project would have the potential to increase noise levels in the vicinity of the Project Site due to on-site operational activities, including an increase in outdoor use of open space areas. Further study is needed to determine the significance of these potential impacts. As such, this issue will be evaluated in an EIR.

- b.** *Would the project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?*

Potentially Significant Impact. Vibration is sound radiated through the ground. Construction of the Project would utilize equipment that would generate vibration. Further study is needed to determine the significance of these potential impacts to the surrounding sensitive uses. Operation of the Project would result in the use of stationary equipment that would result in high groundborne vibration and groundborne noise (e.g., HVAC systems) which are typical for large commercial/office projects. As such, this issue shall be evaluated in an EIR.

- c.** *Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

Potentially Significant Impact. A significant impact could occur if a project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area.

Because the Project would increase activity on the site, there may be a permanent increase of ambient noise levels compared to existing conditions. Further study is needed to determine the significance of these potential impacts. Therefore, this issue will be evaluated in the EIR.

- d. *Would the project 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 of the Project has the potential to temporarily or periodically increase ambient noise levels above existing levels. Noise impacts associated with construction activities could have potentially significant impacts to the surrounding sensitive uses. Further, operational activities could temporarily or periodically increase ambient noise levels above existing levels. Additional study is needed to determine the significance of these potential impacts. This issue will be evaluated in an EIR.

- 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. A significant impact could occur if a project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise. The closest airport to the Project Site is the Santa Monica Municipal Airport, which is located approximately 1.1 miles to the southwest. According to the Los Angeles County Airport Land Use Commission Airport Influence Area map, the Project Site does not fall within the airport's 65 or 70 CNEL noise contours.⁴³ As such, the Project would not expose people to excessive noise levels associated with the Santa Monica Municipal Airport. Impacts would be less than significant, and no further evaluation is required in an EIR.

- 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?***

Less than Significant Impact. The Project Site is located 1.1 miles northeast of the Santa Monica Municipal Airport, which is a general aviation airport. The Project is not within the vicinity of a private airstrip. Impacts would be less than significant, and no further evaluation is required in an EIR.

⁴³ Los Angeles County Airport Land Use Commission, Comprehensive Airport Land Use Plan (adopted December 19, 1991).

4.13 POPULATION AND HOUSING

- a. ***Would the project 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. A significant impact could occur if a project were to locate new development, such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area. The increased office floor area has been designed to meet the architectural, access, safety, and plumbing standards that could accommodate an increase of approximately 600 office employees.⁴⁴ The additional space, as well as modernization of the existing space, is intended by the Applicant to maintain competitiveness in the Los Angeles office market. Tenants and employees are expected to be drawn from the existing business and population of the region. The scale of the Project would not result in substantial regional growth that would induce excess population growth. Impacts would be less than significant and no further evaluation is required in an EIR.

- b. ***Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?***

No Impact. A significant impact may occur if a project were to result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. No housing exists on the Project Site. The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area. Thus, the Project would not displace any existing housing, necessitating the construction of replacement housing elsewhere. No impact would occur and no further evaluation is required in an EIR.

- c. ***Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?***

No Impact. A significant impact could occur if a project were to result in the displacement of population, necessitating the construction of replacement housing elsewhere. The Project Site does not include any housing. No displacement of existing housing would occur. No impact would occur and no further evaluation is required in an EIR.

⁴⁴ This design criteria is supported by reported averages and benchmarks of 190 to 200 gross square feet per employee. See *Workplace Utilization and Allocation Benchmark*, U.S. General Services Administration, Office of Real Property Management Performance Measurement Division (2012).

4.14 PUBLIC SERVICES

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

i. **Fire protection**

Less than Significant Impact. A project could have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between commercial land uses and a LAFD fire station that houses an engine company is 1 mile, and 1.5 miles for a truck company.

Fire protection and emergency medical services in the West Los Angeles Community Plan Area are provided by the LAFD. The Project Site is served by LAFD Station 59, West Los Angeles Fire Station, located at 11505 Olympic Boulevard, approximately 0.1 miles southwest of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station 59 to the Project Site, fire protection response would be considered adequate. The Project would result in an increase of approximately 600 employees and daily visitors to the Project Site. The increase in office and restaurant space on the site would increase the activity level within the Project Site, which could potentially increase demand for LAFD services. However, this marginal change in demand is not expected to require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility. Impacts would be less than significant, and no further evaluation is required in an EIR.

ii. **Police protection**

Less than Significant Impact. A significant impact could occur if the City of Los Angeles Police Department (LAPD) were not adequately able to serve a project without constructing a new or physically altered station, the construction of which may cause significant environmental impacts. The LAPD provides police protection services in the West Los Angeles Community Plan Area. The Project Site is located in the West Los Angeles Division of the LAPD's West Bureau. The West Los Angeles Division provides police protection services for 18 communities including Bel Air, Brentwood, Century City, Cheviot Hills, and West Los

Angeles. The West Los Angeles Division is served by the West Los Angeles Community Police Station located at 1663 Butler Avenue.

The Project would result in an increase of approximately 600 employees and daily visitors to the Project Site, which could lead to an increase in demand on LAPD services. Private on-site security would patrol the Project Site. Additionally, the marginal increase in demand is not expected to require any addition or alteration in police facilities. Impacts would be less than significant, and no further evaluation is required in an EIR.

iii. Schools

Less than Significant Impact. A significant impact could occur if a project were to include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project would result in an increase number of employees accessing the Project Site and may indirectly increase the City's residential population. However, the distribution of these employees are not anticipated to generate a demand for school facilities that would exceed the capacity of any given school or of LAUSD in general. The possible increase in residents would likely include children of all ages. This would distribute the population increase of children to the appropriate elementary school, middle school and high school. Impacts would be less than significant, and no further evaluation is required in an EIR.

iv. Parks

Less than Significant Impact. A significant impact could occur if a project were to result in the construction of new recreation and park facilities that creates significant direct or indirect impacts to the environment. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area which will include multi-purpose amenity areas geared toward recreation, fitness, meeting and large event spaces. The Project would result in an increase of approximately 600 employees that may indirectly increase the City's residential population. However, the distribution of these new residents are not anticipated to generate sufficient park demand as to require new facilities. Impacts would be less than significant, and no further evaluation is required in an EIR.

v. **Other public facilities**

Less than Significant Impact. A significant impact could occur if a project were to include substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site.

Library services within the West Los Angeles Community Plan Area are provided by the City of Los Angeles Public Library (LAPL). The LAPL provides library services at the Central Library, 7 regional branch libraries, 56 community branches, and 2 bookmobile units (consisting of a total of 5 individual bookmobiles). The West Los Angeles Regional Library is located at 11360 Santa Monica Boulevard, less than 1 mile northwest of the Project Site. The Project could indirectly generate a minimal amount of new residents in the West Los Angeles Community Plan Area near the Project site, but the Project would not result in an increased demand on library services beyond any threshold. Impacts would be less than significant, and no further evaluation is required in an EIR.

4.15 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?***

Less than Significant Impact. A significant impact could occur if a project includes substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of these facilities would occur. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area which will include multi-purpose amenity areas geared toward recreation, fitness, and meeting and large event spaces. Implementation of the Project would result in approximately 600 additional employees. However, this increase in employment would not be regionally substantial and therefore the potential effect on parks or other recreational facilities would not be significant. Furthermore, the Project would incorporate recreation amenities, such as outdoor playing courts, a multi-purpose event lawn, a variety of collaborative meeting spaces, and a multi-purpose meeting facility that would alleviate the demand for open space by on-site employees. Impacts would be less than significant, and no further evaluation is required in an EIR.

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

Less than Significant Impact. A significant impact could occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. While the Project would include recreational facilities, including roof decks, as part of the design, these features do not in themselves have adverse physical effects on the environment. Impacts would be less than significant, and no further evaluation is required in an EIR.

4.16 TRANSPORTATION AND TRAFFIC

- a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Potentially Significant Impact. A significant impact could occur if a project were to result in substantial increases in traffic volumes in the vicinity of the project such that the existing street capacity experiences a decrease in the existing volume to capacity ratios or experiences increased traffic congestion exceeding LADOT's recommended level of service (LOS). Construction of the Project has the potential to affect transportation and the circulation system through the hauling of excavated materials and demolition debris; the transport of construction equipment and materials; travel by construction workers to and from the Project Site; and temporary closures of vehicle lanes. Operation of the Project would result in an increase in the number of employees and patrons visiting the Project Site. Further study is needed to determine the significance of these impacts. As such, a traffic impact report will be prepared for the Project and this topic will be evaluated in an EIR.

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

Potentially Significant Impact. The Los Angeles County Congestion Management Program (CMP) was issued by the Los Angeles County metropolitan Transportation (Metro) in October 2010.⁴⁵ The CMP identifies 31 arterial monitoring intersections within proximity of the Project Site:

1. I-10 Freeway Eastbound Off-Ramp/34th Street & Pico Boulevard
2. Centinela Avenue & I-10 Freeway Westbound On-Off Ramps
3. Centinela Avenue & Pico Boulevard
4. Bundy Drive & Olympic Blvd
5. Bundy Drive & Pico Boulevard
6. Bundy Drive & I-10 Freeway Eastbound On-Ramp
7. Bundy Drive & Ocean Park Blvd

⁴⁵ Los Angeles County Metropolitan Transportation Authority, 2010 Los Angeles County Congestion Management Program, https://www.metro.net/projects/congestion_mgmt_pgm/, (2010).

8. Barrington Avenue & Santa Monica Blvd
9. Barrington Ave & La Grange Ave
10. Barrington Ave & Mississippi Ave
11. Barrington Ave & Olympic Blvd
12. Barrington Ave & Pico Blvd
13. Barrington Ave & Gateway Blvd
14. Barrington Ave & National Blvd
15. Colby Ave & Olympic Blvd
16. Purdue Ave & Olympic Blvd
17. Sawtelle Blvd & Santa Monica Blvd
18. Sawtelle Blvd & Olympic Blvd
19. Sawtelle Blvd & Tennessee Ave/I-405 Freeway Southbound Off-Ramp
20. Sawtelle Blvd & Pico Blvd
21. Sawtelle Blvd & National Blvd
22. I-405 Freeway Southbound On-Ramp & National Blvd
23. I-405 Freeway Northbound Off-Ramp & National Blvd
24. Cotner Avenue & Olympic Blvd
25. Cotner Ave & Pico Blvd
26. Sepulveda Blvd & Santa Monica Blvd
27. Sepulveda Boulevard & Olympic Blvd
28. Sepulveda Boulevard & Pico Blvd
29. Veteran Avenue & Olympic Blvd
30. Gateway Blvd/Exposition Blvd & Pico Blvd
31. Sawtelle Blvd & Mississippi Ave

The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area which will include multi-purpose amenity areas geared toward recreation, fitness, meeting and large event spaces. The Project would result in an increase in traffic during peak hours and could potentially conflict with LOS and travel demand measures established by the CMP. Further study is needed to determine the significance of these impacts. As such, this topic will be evaluated in an EIR.

c. *Would the project 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 does not include any aviation-related uses. Further, as discussed in **Section 4.8(e)** above, the Project Site is not located within an airport land use plan and the Project's existing height (158 feet) would not change. Safety risks associated with a change in air traffic patterns would not occur. No impacts would occur and no further evaluation of this issue is required in an EIR.

d. *Would the project 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 Impact. A significant impact would occur if a project were to include new roadway design or introduce into an area with specific transportation requirements, characteristics, project access, or other features a new land use or project features designed in such a way as to create hazardous conditions. Implementation of the Project would not affect long-term access to the Project Site. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area which will include multi-purpose amenity areas geared toward recreation, fitness, meeting and large event spaces. Implementation of the Project would result in employment growth.

No changes are proposed to the surrounding roadways, and the Project would not include unusual or hazardous design features. As such, pedestrians, bicyclists, and private and emergency vehicles would still be able to circulate safely around the Project area. Adherence to all emergency response plan requirements set forth by the City and LAFD would be required through the duration of the Project's construction and operation phases. Impacts would be less than significant, and no further evaluation is required in an EIR.

e. *Would the project result in inadequate emergency access?*

Less than Significant Impact. A significant impact could occur if a project did not provide adequate emergency access or would threaten the ability of emergency vehicles to access and serve adjacent uses. Construction of the Project Site may require partial lane closures. However, any such closures would be temporary in nature and would be coordinated with LADOT, Building and Safety, and Public Works. Such closures may cause temporary inconvenience but would not substantially interfere with emergency response or evacuation plans. The Project does not include features that would obstruct emergency vehicle access to the Project Site or adjacent uses in the vicinity. Access to the structures will be reviewed by the City for conformity to building and safety codes as part of the approval and permitting process. As such, impacts would be less than significant, and no further evaluation of this issue is required in an EIR.

f. ***Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?***

Potentially Significant Impact. A significant impact could occur if a project would conflict with adopted policies of the City or of transportation agencies, such as Metro. The Project Site is served by Metro and the City of Santa Monica Big Blue Bus and is within 0.9 miles of the Expo Line Bundy Light Rail Station. The City of Los Angeles has adopted policies as part of its General Plan relative to pedestrian, transit and bicycle mobility. The Project could change existing or planned pedestrian and bicycle facilities along the right of way adjacent to the Project Site and could affect the local circulation system during the construction period. Further study is needed to determine the significance of any proposed changes to pedestrian or bicycle facilities. As such, this topic shall be assessed in an EIR.

4.17 TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)***

Potentially Significant Impact. A historic resource evaluation for the Project site was completed in March 2016. According to the *Historical Resource Evaluation Report* (included as **Appendix A** to this Initial Study), there is no record of any structure and/or property located on the site as being eligible for listing in the California Register of Historical Resources or local register of historic resources. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation of the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. The Native American Heritage Commission (NAHC) provides a list of Native American groups and individuals who could have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Site. Notices have been mailed to Native American tribes known to be culturally affiliated with the Project area. Until the City has received and evaluated responses from the Tribes, a determination of significance cannot be made. Therefore, this topic will be evaluated in an EIR.

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

Potentially Significant Impact. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation of the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

The NAHC provides a list of Native American groups and individuals who could have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Site. Notices have been mailed to Native American tribes known to be culturally affiliated with the Project area. Until the City has received and evaluated responses from the Tribes, a determination of significance cannot be made. Therefore, this topic will be evaluated in an EIR.

4.18 UTILITIES AND SERVICE SYSTEMS

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact. A significant impact could occur if a project exceeds the wastewater treatment requirements as established by the Los Angeles Regional Water Quality Control Board (LARWQCB). Wastewater collection and treatment services in the Project area are provided by the City of Los Angeles Department of Public Works (LADWP). Similar to existing conditions, wastewater generated during operation of the Project would be collected and discharged into the sewer main that currently serves the Project Site and conveyed via existing sewer lines to the Hyperion Treatment Plant (HTP), a public facility subject to the State's wastewater treatment requirements.

The HTP is designed to treat 450 million gallons per day (mgd), with an annual increase in wastewater flows limited to 5 mgd by City Ordinance No. 166,060. The HTP currently processes an average of 275 mgd on dry weather days and thus, has a remaining capacity of 175 mgd.⁴⁶ The discharge of effluent from the HTP into Santa Monica Bay is regulated to meet the LARWQCB's requirement beneficial use. Accordingly, the HTP's effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The City's Environmental Monitoring Division also monitors flows in the Santa Monica Bay. The wastewater generated by the Project would be typical of office and restaurant uses. As the HTP is in compliance with the LARWQCB's wastewater requirements, thus the Project would not exceed the LARWQCB's wastewater treatment requirements. As such, impacts would be less than significant and no further analysis is required in an EIR.

b. Would the project 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. A significant impact could occur if a project were to increase water consumption or wastewater generation to such a degree that the capacity of the existing facilities currently serving the Project Site would be exceeded. Compared to existing conditions, the Project would increase the demand for water and generate additional wastewater. With regard to water, the location, condition, and capacity of water conveyance lines will be evaluated to determine whether adequate capacity is available to accommodate the required fire flows and demand generated by the Project. As described above, wastewater generated on the Project Site would be conveyed to and treated

⁴⁶ City of Los Angeles LA Sanitation Website, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1blrqbnqt2_49&_afrLoop=5742596459547674#!, accessed October 21, 2016.

at the HTP prior to being discharged into the Santa Monica Bay. With regards to wastewater, the projected gallons per day (gpd) of wastewater discharged from the Project Site will be determined and compared to the existing design capacity of the local sewer conveyance lines and HTP. Further study is needed to determine the significance of these impacts. As such, this topic will be evaluated in the EIR.

c. *Would the project 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?*

Less than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system, resulting in the need to construct new stormwater drainage facilities. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space and 5,000 gross square feet of restaurant use. Implementation of the Project would not substantially alter the stormwater runoff from the site. Additionally, the Project would be required to demonstrate compliance with the City's LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Therefore, the Project would not create or contribute stormwater runoff that would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant, and no further analysis is required in an EIR.

d. *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?*

Potentially Significant Impact. A significant impact could occur if a project were to increase water consumption to such a degree that new water sources would need to be identified. The Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site. As discussed above, the Project would increase the demand for water supplies. Further study is needed to determine the significance of these impacts. As such, this topic will be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact could occur if a project were to increase the amount of wastewater generated on the Project Site. As previously discussed, wastewater flows from the Project Site would be conveyed to the HTP. The proposed office and restaurant uses would result in an increase

in generated wastewater compared to existing operations of the Project Site. Further study is needed to determine the significance of these impacts. As such, this topic will be evaluated in an EIR.

f. *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

Potentially Significant Impact. A significant impact could occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Construction activities associated with the Project would generate inert waste. Construction waste materials are expected to be typical construction debris, including wood, paper, glass, plastic, metals, cardboard, and green wastes. Pursuant to CalGreen, the Project Applicant would be required to recycle/divert 65 percent of the construction waste. The remainder would be disposed of in a Class III landfill. Operation of the Project would result in an increase in solid waste, compared to existing conditions. A majority of the City's solid waste is disposed of at the Sunshine Canyon Landfill; however depending on with whom the waste hauler has contracts, waste could be sent to Chiquita Canyon, Simi Valley, or a number of other disposal facilities. Thus, further study is needed to determine the significance of these impacts. As such, this topic will be evaluated in an EIR.

g. *Would the project comply with federal, State, and local statutes and regulations related to solid waste?*

Less than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project Site is developed with two 10-story office towers and an adjoining 5-story parking structure (3 levels of above-grade and 2 levels of subterranean parking). The Project would expand the existing buildings' footprint by adding 115,000 gross square feet of office space, 5,000 gross square feet of restaurant use and 125,199 gross square feet of open space area which will include multi-purpose amenity areas geared toward recreation, fitness, meeting and large event spaces. Implementation of the Project would result in employment growth of approximately 600 employees. The Project would generate solid waste during both construction and operation that is typical of additions to existing office uses and operation of restaurant and office uses.

Waste haulers currently service the Project Site. Disposal services utilized for the Project Site currently comply with all federal, state, and local statutes and regulations and would be expected to continue to do so during operation of the Project. Under AB 939, every city and county is required to meet a waste diversion goal of 75 percent by 2020. In 2000, the state adopted a diversion goal of 50 percent, the City is currently exceeding this goal by 15 percent. The Project would be required to comply with applicable regulations regarding solid waste disposal. Impacts would be less than significant, and no further evaluation of this issue is required in an EIR.

4.18 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?*

Potentially Significant Impact. This Initial Study identified potential impacts related to Air Quality, Biological Resources, Green House Gas Emissions, Land Use and Planning, Noise, Transportation and Traffic, Tribal Resources, and Utilities that will be analyzed further in an EIR. If significant impacts are identified in the EIR, these impacts could have the potential to degrade the quality of the environment.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the Project alone. Potentially significant impacts are identified in this Initial Study related to Air Quality, Biological Resources, Green House Gas Emissions, Land Use and Planning, Noise, Transportation and Traffic, Tribal Resources, and Utilities. Cumulative impacts to resources for which potentially significant impacts are identified in this Initial Study will be analyzed further in an EIR.

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

Potentially Significant Impact. A significant impact could occur if a project were to have the potential to result in substantial adverse effects on human beings, either directly or indirectly. As discussed in this Initial Study, the Project may result in potentially significant environmental impacts associated with Air Quality, Biological Resources, Green House Gas Emissions, Land Use and Planning, Noise, Transportation and Traffic, Tribal Resources, and Utilities. These impacts could have potentially significant impacts on human beings and further analysis of these impacts will be analyzed in an EIR.

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