CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT

DOCUMENT FILED City Clerk's Office No: N5-16-2967-PL Certified by Edg Date: 9/9/16

LEAD CITY AGENCY:		**COUNCIL DISTRICT:**
City of Los Angeles Department of City Planning		CD 11 – Mike Bonin
PROJECT TITLE:	**ENVIRONMENTAL CASE:**	**CASE NO.**
Panama/Alla Creative Office Project	ENV-2016-1214-MND	VTT-74073-CN

PROJECT LOCATION: 12964, 12930, 12922, 12920, and 12910 Panama Street, Los Angeles, California 90066

PROJECT DESCRIPTION: The Project would involve the construction of a 155,000-square-foot creative office campus with a separate above-grade parking structure. The Project would involve the construction of three two-story office buildings. Two of the buildings would be 55,000 square feet with an approximate height of 33-40 feet and one building would be 45,000 square feet with an approximate height of 37-40 feet. The Project would incorporate second floor terraces in each of the office buildings and a communal outdoor meeting room, located in the center of the Project Site. Parking for the office uses would be provided in 54 uncovered surface parking spaces and a four-story (approximately 44 feet high) parking structure with 546 parking spaces. A total of 47 bicycle parking spaces would be provided for the Project, as required by the Los Angeles Municipal Code. In order to permit development of the Project, the City may require approval of one or more of the following discretionary actions:

- Vesting Tentative Tract Map;
- Haul Route for the import of approximately 3,650 cubic yards of soil;
- Grading, excavation, and building permits; and
- Other permits, ministerial or discretionary, as may be necessary in order to execute and implement the project. Such approvals may include, but are not limited to landscaping plan approvals, permits for improvements in the public right-of-way and driveway curb cuts, storm water discharge permits, permits for temporary street closures, and installation and hookup approvals for public utilities and related permits.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
CDC Mar Panama LLC
721 North Douglas Street
El Segundo, California 90245

FINDING:
The Department of City Planning of the City of Los Angeles finds 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.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM	**TITLE**	**TELEPHONE NUMBER**
Jenna Monterrosa	City Planner	(213) 978-1377
ADDRESS	**SIGNATURE (Official)**	**DATE**
200 North Spring Street Los Angeles, California 90012	Charles J. Rausch, Jr. Associate Zoning Administrator	August 31, 2016

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 11 – Mike Bonin	**DATE:** August 11, 2016
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2016-1214-MND	**RELATED CASES:**	
PREVIOUS ACTIONS CASE NO. **None**	❑ DOES have significant changes from previous actions. ❑ DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION: Vesting Tentative Tract Map, Haul Route for the import of approximately 3,650 cubic yards of soil; grading, excavation, and building permits; and other permits, ministerial or discretionary, as may be necessary in order to execute and implement the project. Such approvals may include, but are not limited to landscaping plan approvals, permits for improvements in the public right-of-way and driveway curb cuts, storm water discharge permits, permits for temporary street closures, and installation and hookup approvals for public utilities and related permits.

ENV PROJECT DESCRIPTION: The Project would involve the construction of a 155,000-square-foot creative office campus with a separate above-grade parking structure. The Project would involve the construction of three two-story office buildings. Two of the buildings would be 55,000 square feet with an approximate height of 33-40 feet and one building would be 45,000 square feet with an approximate height of 37-40 feet. Parking for the office uses would be provided in 54 uncovered surface parking spaces and a four-story (approximately 44 feet high) parking structure with 546 parking spaces. A total of 47 bicycle parking spaces would be provided for the Project, as required by the Los Angeles Municipal Code.

ENVIRONMENTAL SETTING: The Project is located at 12964, 12930, 12922, 12920, and 12910 Panama Street (the "Project Site") in the Palms-Mar Vista-Del Rey community of the City of Los Angeles. The Project site is bounded by Alla Street on the west, Panama Street on the north, a self-storage building fronting Culver Boulevard on the south, and industrial development to the north. The location of the Project Site is shown in Figure II-1, Regional Vicinity and Project Location. The Project Site is associated with Assessor Parcel Numbers 4223-008-005, 4223-008-006, 4223-008-007, 4223-008-008, and 4223-008-010.

PROJECT LOCATION: 12444 Chandler Boulevard

COMMUNITY PLAN AREA: Palms-Mar Vista-Del Rey **STATUS:** ❑Preliminary ❑Proposed	☒Does Conform to Plan ❑Does NOT Conform to Plan	**AREA PLANNING COMMISSION:** West Los Angeles	**CERTFIED NEIGHBORHOOD COUNCIL:** Del Rey

EXISTING ZONING: M1-1 and M2-1	**MAX DENSITY ZONING:** 1.5:1.0	**LA River Adjacent:** No
GENERAL PLAN LAND USE: Limited Manufacturing and Light Manufacturing	**MAX. DENSITY PLAN:** 1.5:1.0	

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	City Planner	(213) 978-1377
	Title	Phone

Evaluation of Environmental Impacts:

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 that 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 which 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.

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.

❑ AESTHETICS	❑ GREENHOUSE GAS EMISSIONS	❑ POPULATION AND HOUSING
❑ AGRICULTURE AND FOREST RESOURCES	❑ HAZARDS AND HAZARDOUS MATERIALS	❑ PUBLIC SERVICES
❑ AIR QUALITY	❑ HYDROLOGY AND WATER QUALITY	❑ RECREATION
❑ BIOLOGICAL RESOURCES	❑ LAND USE AND PLANNING	❑ TRANSPORTATION/ CIRCULATION
❑ CULTURAL RESOURCES	❑ MINERAL RESOURCES	❑ UTILITIES
❑ GEOLOGY AND SOILS	❑ NOISE	❑ MANDATORY FINDINGS OF SIGNIFICANCE

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

Background

APPLICANT NAME:
CDC Mar Panama LLC

PHONE NUMBER:
(310) 781-8261

APPLICANT ADDRESS:
721 North Douglas Street
El Segundo, California 90245

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:
August 1, 2016

PROPOSAL NAME (If Applicable):
Panama/Alla Creative Office Project

Los Angeles City Planning Department

City Hall • 200 N. Spring Street, Room 621 • Los Angeles, CA 90012

INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION

PALMS-MAR VISTA-DEL REY COMMUNITY PLAN COMMUNITY PLAN AREA

Panama/Alla Creative Campus Project

Case No. ENV-2016-1214-MND

Council District No. 11

THIS DOCUMENT COMPRISES THE INITIAL STUDY ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

Project Addresses:

12964, 12930, 12922, 12920, and 12910 Panama Street, Los Angeles, CA 90066

Project Description: The Project would involve the demolition of five vacant commercial buildings, a building pad where a sixth building once stood, and associated asphalt parking lots. The Project would involve the construction of a 155,000-square-foot creative office campus with a separate above-grade parking structure. The Project would involve the construction of three two-story office buildings. Two of the buildings would be 55,000 square feet with an approximate height of 33-40 feet and one building would be 45,000 square feet with an approximate height of 37-40 feet. The Project would incorporate second floor terraces in each of the office buildings and a communal outdoor meeting room, located in the center of the Project Site. Parking for the office uses would be provided in 54 uncovered surface parking spaces and a four-story (approximately 44 feet high) parking structure with 546 parking spaces. In order to permit development of the Project, the City may require approval of one or more of the following discretionary actions: (1) Tract Map; (2) grading, excavation, and building permits; and (3) other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project.

APPLICANT:

CDC Mar Panama LLC

PREPARED BY:

EcoTierra Consulting, Inc.

August 2016

Panama/Alla Creative Campus Project

12964, 12930, 12922, 12920, AND 12910 PANAMA STREET

INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION

PREPARED FOR:
The City of Los Angeles
Department of City Planning
200 North Spring Street, Room 621
Los Angeles, CA 90012-2601

APPLICANT:
CDC Mar Panama LLC

PREPARED BY:
EcoTierra Consulting, Inc.
555 W. 5th Street, 31st Floor
Los Angeles, CA 90013

August 2016

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I. INTRODUCTION

1. INTRODUCTION

The subject of this Initial Study is the proposed Panama/Alla Creative Campus Project (the "Project"), a development with three two-story creative office buildings with approximately 155,000 square feet of floor area, and an associated parking structure.

2. PROJECT INFORMATION

Project Title: Panama/Alla Creative Campus

Project Applicant: CDC Mar Panama LLC

Project Location: 12964, 12930, 12922, 12920, and 12910 Panama Street, Los Angeles, CA 90066

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

3. PURPOSE AND CONTENTS OF THE INITIAL STUDY

An Initial Study is a preliminary analysis prepared by and for the City of Los Angeles as Lead Agency to determine whether an Environmental Impact Report or a Negative Declaration or Mitigated Negative Declaration must be prepared for a proposed project.

State CEQA Guidelines Section 15063 states:

(a) The Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.

(2) The lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.

(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plan described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs; and

(7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.

(4) A discussion of the ways to mitigate the significant effects identified, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and

(6) The name of the person or persons who prepared or participated in the Initial Study.

(e) Submission of Data. If the project is to be carried out by a private person or private organization, the Lead Agency may require such person or organization to submit data and information which will enable the Lead Agency to prepare the Initial Study. Any person may submit any information in any form to assist a Lead Agency in preparing an Initial Study.

(f) Format. Sample forms for an applicant's project description and a review form for use by the lead agency are contained in Appendices G and H. When used together, these forms would meet the requirements for an initial study, provided that the entries on the checklist are briefly explained pursuant to subsection (d)(3). These forms are only suggested, and public agencies are free to devise their own format for an initial study. A previously prepared EIR may also be used as the initial study for a later project.

(g) Consultation. As soon as a Lead Agency has determined that an Initial Study will be required for the project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain the recommendations of those agencies as to whether an EIR or a Negative Declaration should be prepared. During or immediately after preparation of an Initial Study for a private project, the Lead Agency may consult with the applicant to determine if the applicant is willing to modify the project to reduce or avoid the significant effects identified in the Initial Study.

A "Mitigated Negative Declaration" is prepared for a project when the Initial Study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment. As shown in the following environmental analysis contained in this Initial Study, the

implementation of the Project could cause some potentially significant impacts on the environment, but these potentially significant impacts would be reduced to less than significant impacts by Project revisions in the form of mitigation measures. With regard to some other impacts, the Initial Study shows that no substantial evidence indicates that the Project would have significant environmental impacts. Consequently, this Initial Study concludes that a Mitigated Negative Declaration shall be prepared for the Project.

4. ORGANIZATION OF THE INITIAL STUDY

This Draft Initial Study is organized into six sections as follows:

Introduction: This section provides introductory information such as the project title, the Project Applicant, and the designated Lead Agency for the Proposed Project.

Project Description: This section provides a detailed description of the proposed Project including the environmental setting, project characteristics, related project information, project objectives, and environmental clearance requirements.

Initial Study Checklist: This section contains the completed IS Checklist showing the significance level under each environmental impact category.

Environmental Impact Analysis: This section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Preparers of the Initial Study and Persons Consulted: This section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

References and Commonly Used Acronyms: This section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

II. PROJECT DESCRIPTION

1. PROJECT APPLICANT

The Applicant for the Panama/Alla Creative Office Project (the "Project") is CDC Mar Panama LLC, 721 North Douglas Street, El Segundo, California 90245.

2. PROJECT LOCATION

The Project is located at 12964, 12930, 12922, 12920, and 12910 Panama Street (the "Project Site") in the Palms-Mar Vista-Del Rey community of the City of Los Angeles (the "City"). The Project site is bounded by Alla Street on the west, Panama Street on the north, a self-storage building fronting Culver Boulevard on the south, and industrial development to the north. The location of the Project Site is shown in Figure II-1 (Regional Vicinity and Project Location). The Project Site is associated with Assessor Parcel Numbers 4223-008-005, 4223-008-006, 4223-008-007, 4223-008-008, and 4223-008-010.

Regional access to the Project Site is provided via the Marina Freeway (SR-90), Lincoln Boulevard (SR-1), and the San Diego Freeway (I-405). Local access to the Project Site is via Culver Boulevard and Centinela Avenue.

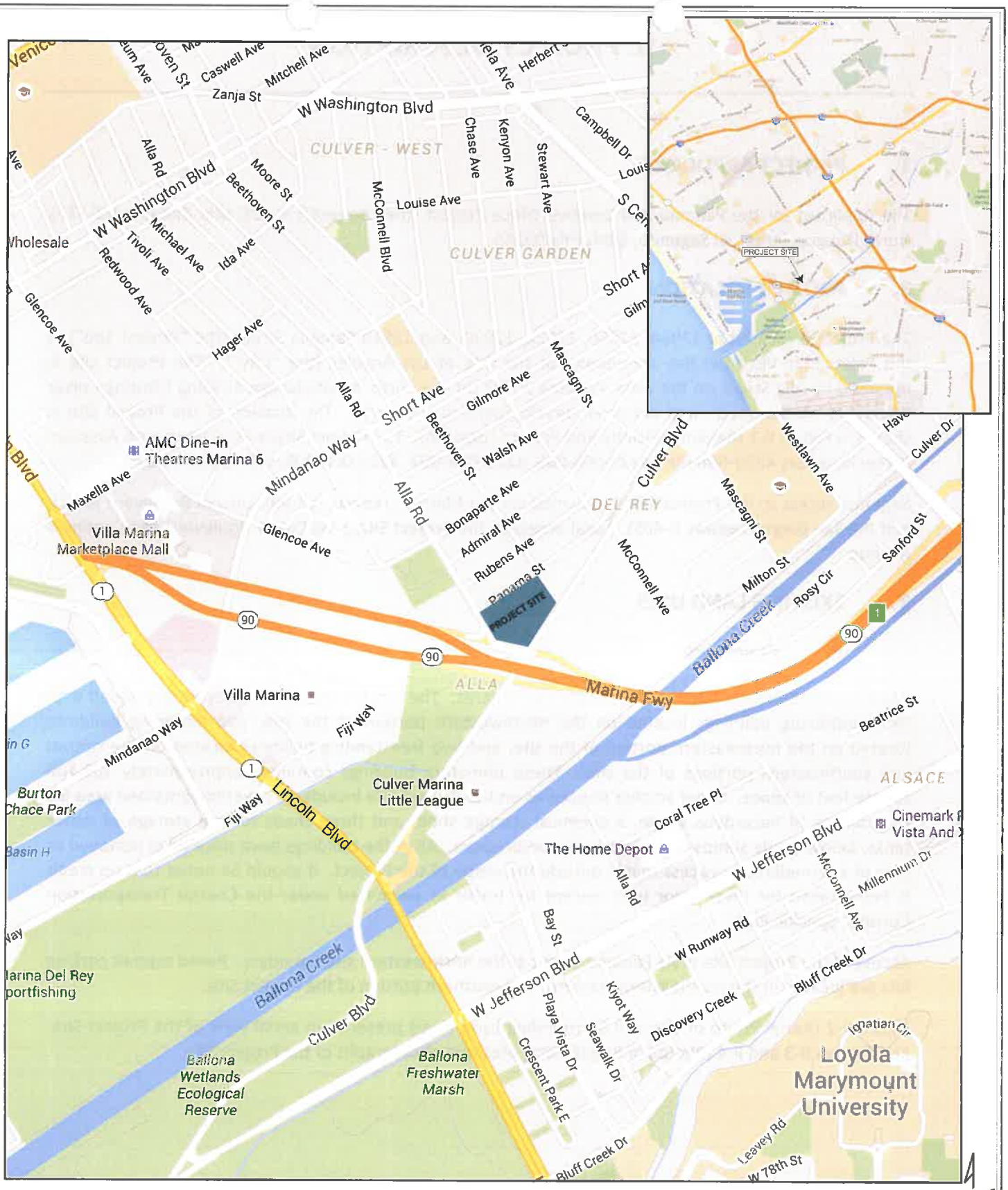
3. EXISTING LAND USES

A. Project Site

The size of the Project Site is approximately 5.73 acres. The Project Site was previously developed with three adjoining buildings located on the northwestern portion of the site, two adjoining buildings located on the northeastern portion of the site, and two freestanding buildings located on the central and southeastern portions of the site. These one-story buildings contained approximately 109,100 square feet of space. Other smaller structures on the Project Site included a covered contained area for the storage of hazardous waste, a chemical storage shed, and three sheds for the storage of water tanks, below-grade sumps, and electric air compressors. All of the buildings have since been removed as part of a remediation process that is outside the scope of the Project. It should be noted that no credit is being taken for these prior uses, except for traffic as permitted under the Coastal Transportation Corridor Specific Plan.

Access to the Project Site is via Panama Street at the northwestern site boundary. Paved asphalt parking lots are located in the northeastern, eastern, and southern portion of the Project Site.

Figure II-2 (Aerial Photo of Site and Surrounding Land Uses) presents an aerial view of the Project Site, and Figures II-3 and II-4 (Photos of Project Site) presents photographs of the Project Site.



Project Site

Source: Google Maps, January 2016.

0 1,000

Scale (Feet)

N

EcoTierra Consulting

Figure II-1
Regional Vicinity and Project Location

Project Site
Source: GoogleEarth, January 2016.

0 450
Scale (Feet)

N

EcoTierra consulting

Figure II-2
Aerial Photo of Site and Surrounding Land Uses

View 1: Looking east toward the Project Site from Panama Street and Alla Road.

View 2: Looking northwest toward the Project Site from Alla Road and the Marina Freeway.

View 3: Looking south toward the Project Site from Panama Street.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, December 2015.

EcoTierra consulting

Figure II-3
Photos of Project Site
Views 1, 2, and 3

View 4: Looking south toward the Project Site from Panama Street and Beethoven Street.

View 5: Looking north along the eastern boundary of the Project Site.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, December 2015.

EcoTierra Consulting

Figure II-4
Photos of Project Site
Views 4 and 5

A. Land Use Plans/Zoning

The Project Site is divided into two zoning designations in the Los Angeles Planning and Zoning Code. The northern boundary of the Project Site, fronting Panama Street, is zoned as M1-1 (Limited Industrial – Height District 1). The southern portion of the Project Site is zoned M2-1 (Light Industrial – Height District 1). The northern portion of the Project Site has a General Plan land use designation of Limited Manufacturing, and the southern portion of the Project Site is designated Light Manufacturing in the Palms-Mar Vista-Del Rey Community Plan (the "Community Plan"). The Project Site is within the Los Angeles Coastal Transportation Corridor Specific Plan area. The floor area ratio (FAR) for the Project Site is limited by the Planning and Zoning Code and the Community Plan. Footnote 1 on the Community Plan land use map limits the FAR permitted by the existing zone. Section 12.21.1.A of the LAMC states that Height District No. 1 in the M1 and M2 zones are restricted to an FAR of 1.5:1.

B. Surrounding Land Uses

The Project site is relatively flat and is surrounded by commercial, light manufacturing, and residential land uses in an urban setting that is similar to other areas in the Del Rey area of the City. The Project Site is surrounded by single-family residences to the north, a low-rise commercial property to the northeast, and a commercial use to the west. A self-storage facility borders the Project Site to the southeast. The Marina Freeway (SR-90) is located to the south of the Project Site.

Panama Street is a Local Street-Standard, Alla Road is an Avenue III, and Culver Boulevard is an Avenue 1), as set forth in Mobility Plan 2035.

Figures II-5 and II-6 (Photos of Surrounding Land Uses) presents photos of the land uses in the immediate vicinity of the Project Site.

4. PROJECT CHARACTERISTICS

A. Project Features

As shown in Figure II-7 (Conceptual Site Plan), the Project would involve the construction of a 155,000-square-foot creative office campus with a separate above-grade parking structure (this represents a 45,100-square-foot increase compared to the buildings that formerly occupied the Project Site). The Project would involve the construction of three two-story office buildings. Two of the buildings would be 55,000 square feet with an approximate height of 33-40 feet and one building would be 45,000 square feet with an approximate height of 37-40 feet. The Project would incorporate second floor terraces in each of the office buildings and a communal outdoor meeting room, located in the center of the Project Site. Parking for the office uses would be provided in 54 uncovered surface parking spaces and a four-story (approximately 44 feet high) parking structure with 546 parking spaces.

The office buildings would be designed in a modern architectural style that utilizes a natural palette that references the proximity to the beach and the Ballona Wetlands. The buildings would include extensive fenestration and windows, including several second floor balconies and ground floor private patios with roll-up doors. One of the main features of the Project Site would be a highly improved landscaped common area that creates an inviting open space that draws inspirations from the vegetation of the Ballona Wetlands. The Project would include a central lawn area, with a bocce ball court, a table tennis corner, outdoor exercise area, and outdoor open seating work areas. The building concept is illustrated in Figures II-8 through II-18.

View 6: Looking southwest toward single-family homes along Panama Street.

View 7: Looking northwest along Alla Road.

View 8: Looking north toward the storage facility on Culver Boulevard, adjacent to the eastern boundary of the Project Site.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, December 2015.

EcoTierra consulting

Figure II-5
Photos of Surrounding Land Uses
Views 6, 7, and 8

View 9: Looking south toward an elevated portion of the Marina Freeway.

View 10: Looking south along Culver Boulevard.

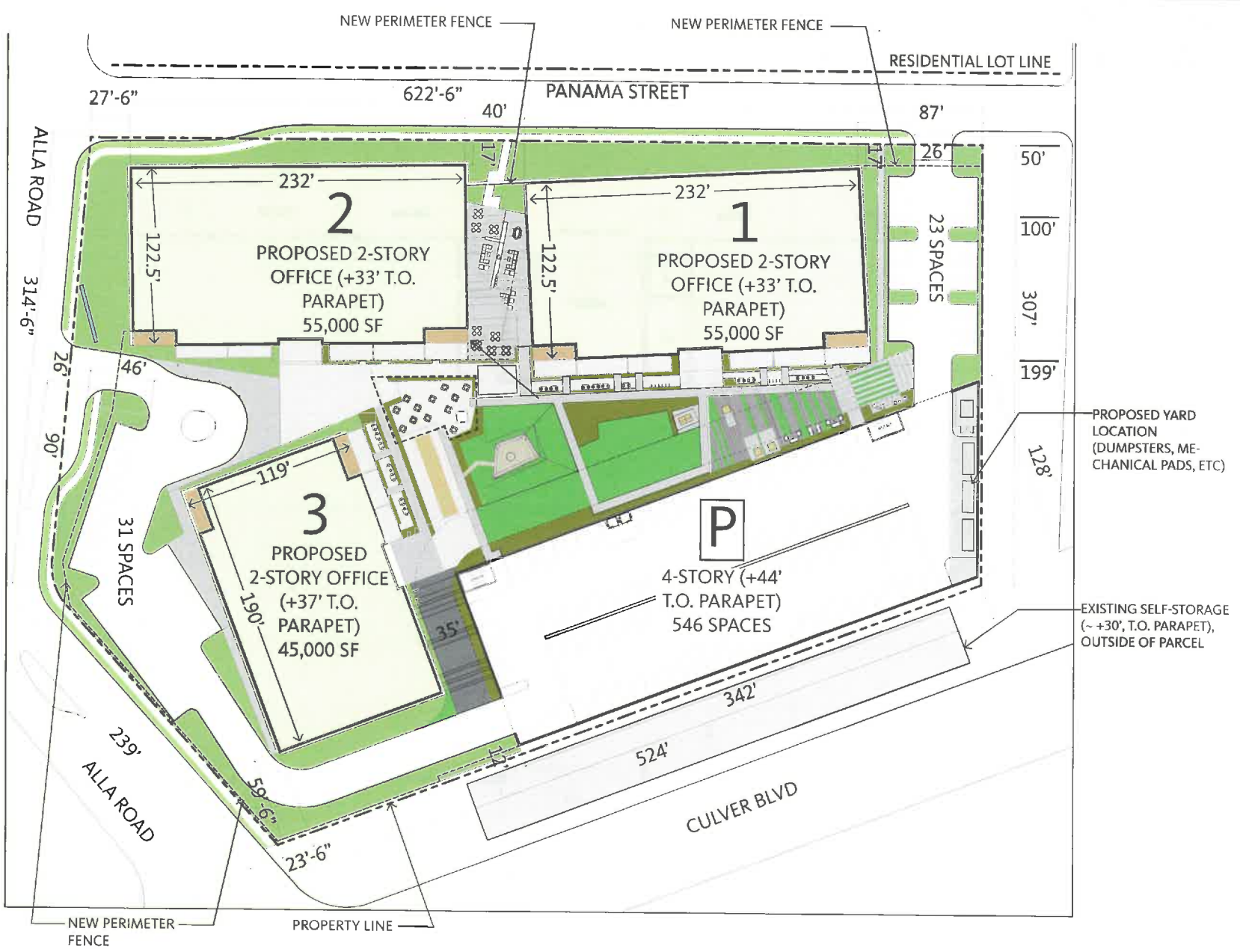
PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, December 2015.

EcoTierra consulting

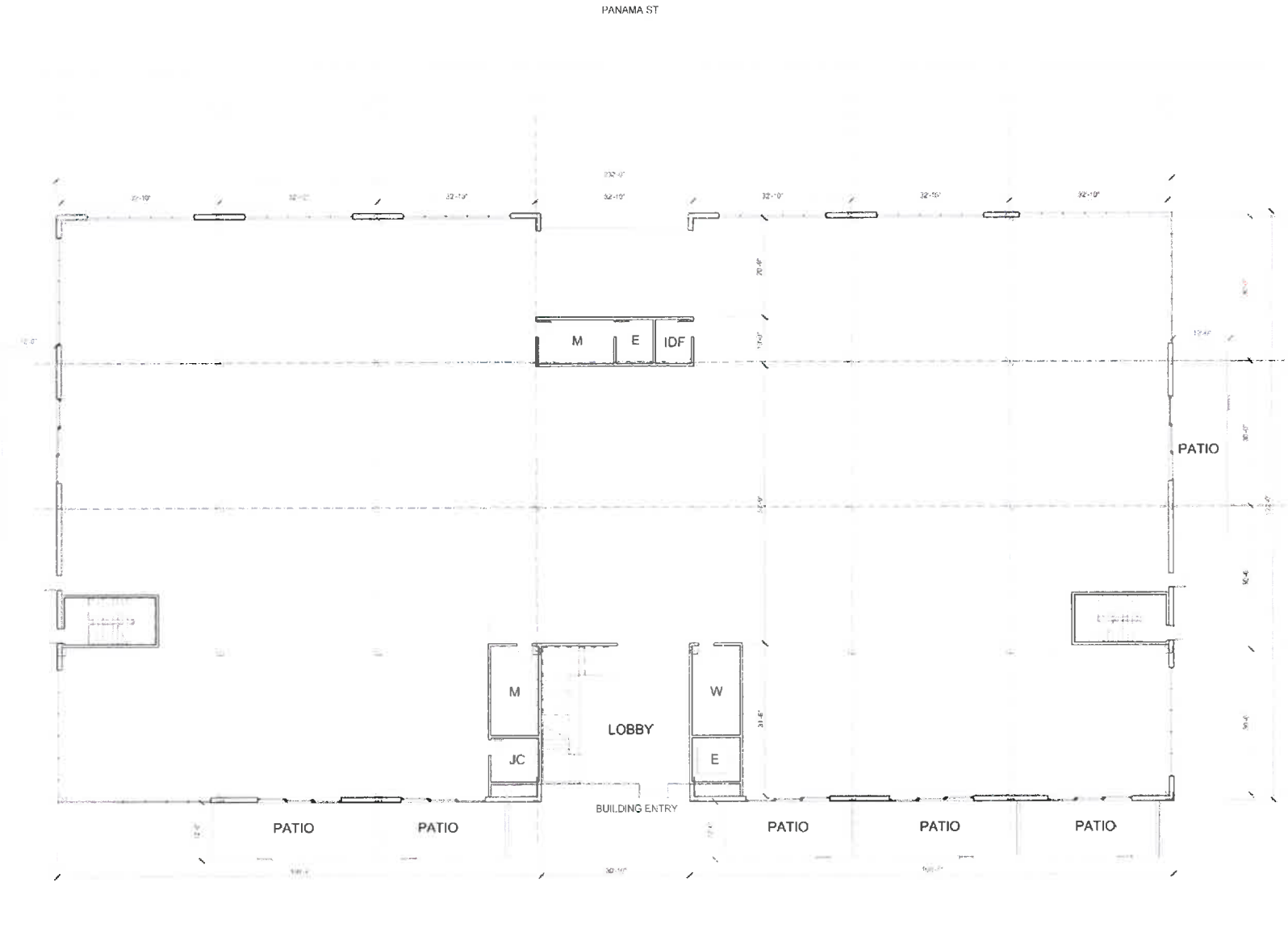
Figure II-6
Photos of Surrounding Land Uses
Views 9 and 10



Source: Gensler, March 2016.

EcoTierra consulting

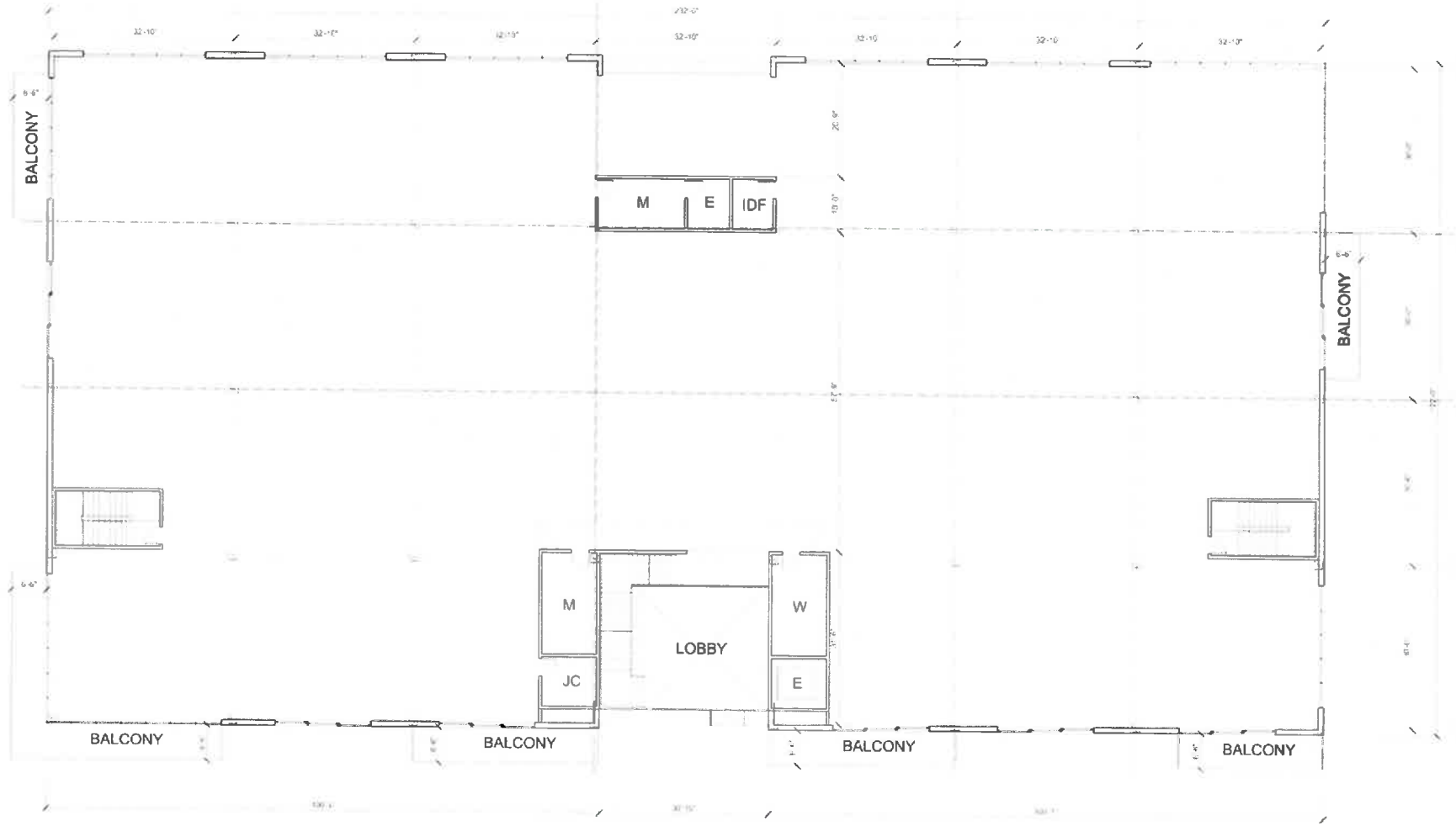
Figure II-7
Conceptual Site Plan



Source: Gensler, March 2016.

EcoTierra consulting

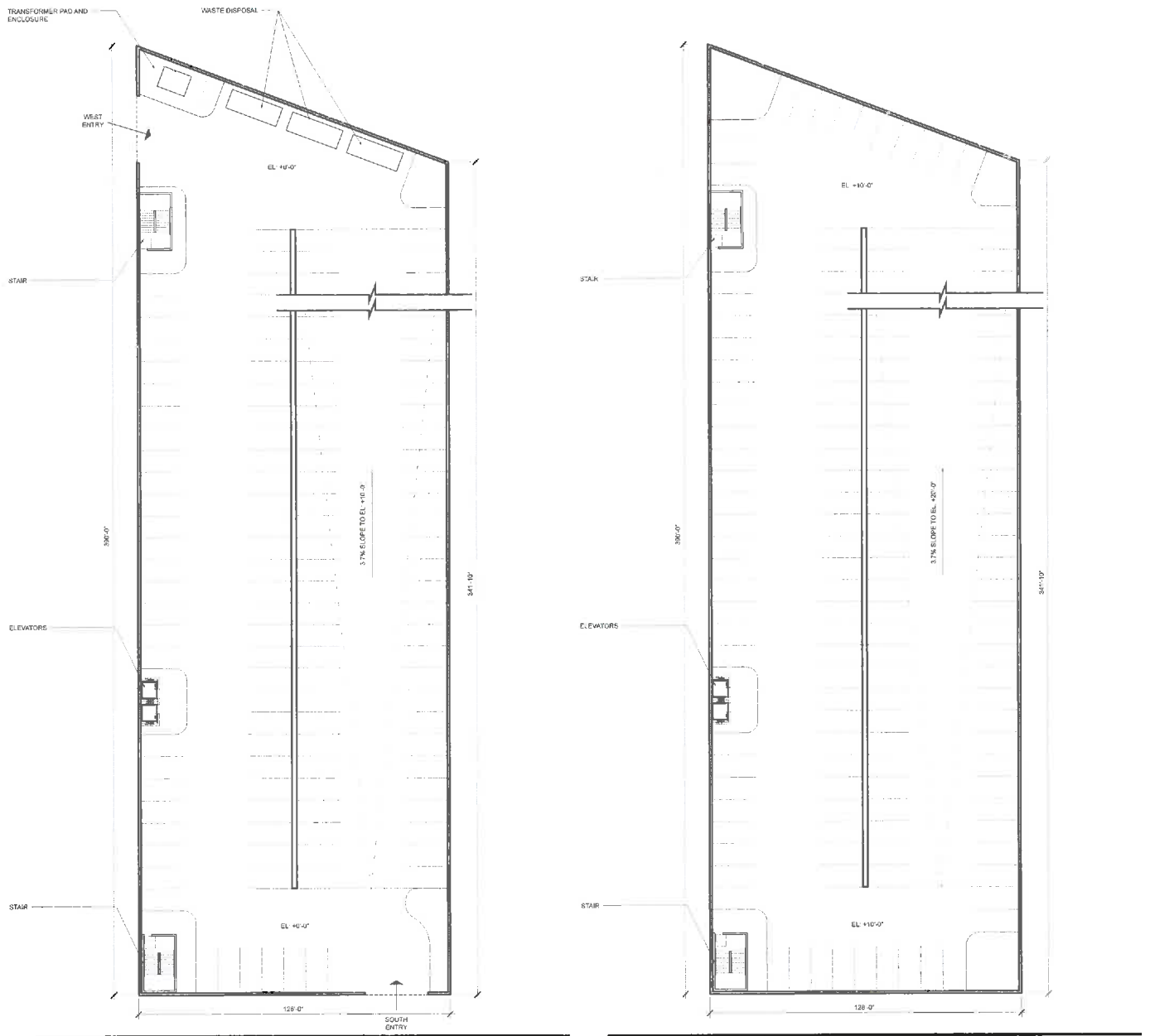
Figure II-8
Level 1 Floor Plan



Source: Gensler, March 2016.

EcoTierra CONSULTING

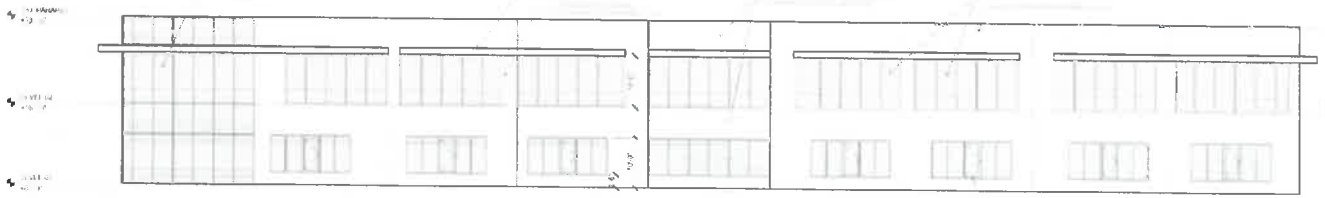
Figure II-9
Level 2 Floor Plan



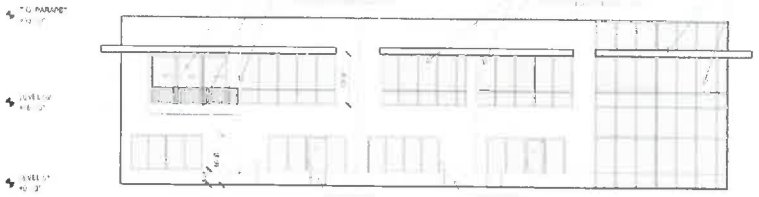
Source: Gensler, March 2016.

EcoTierra consulting

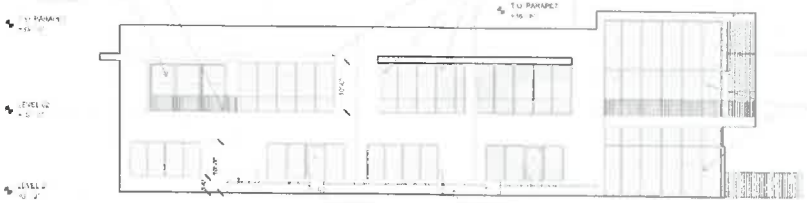
Figure II-10
Parking Structure Floor Plans



4 BUILDING ELEVATION - WEST (PANAMA ST)



3 BUILDING ELEVATION - NORTH



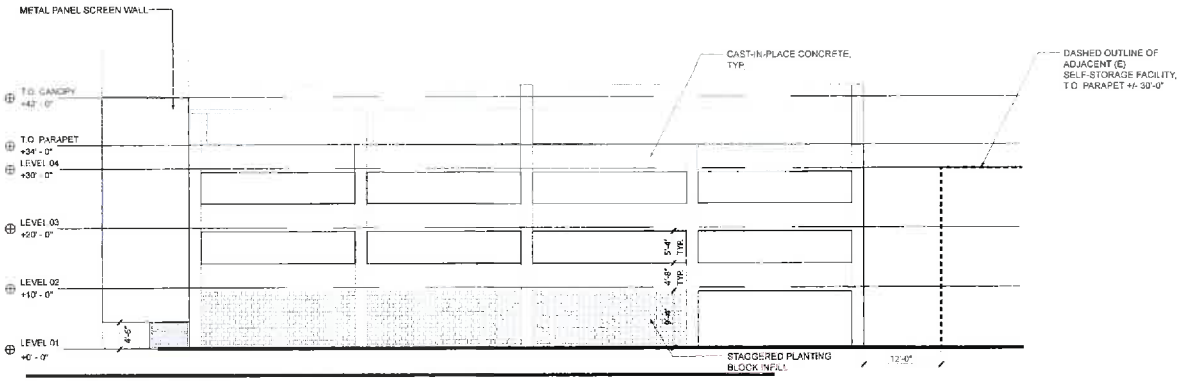
2 BUILDING ELEVATION - SOUTH (ALLA RD)

1 BUILDING ELEVATION - EAST (COURTYARD)

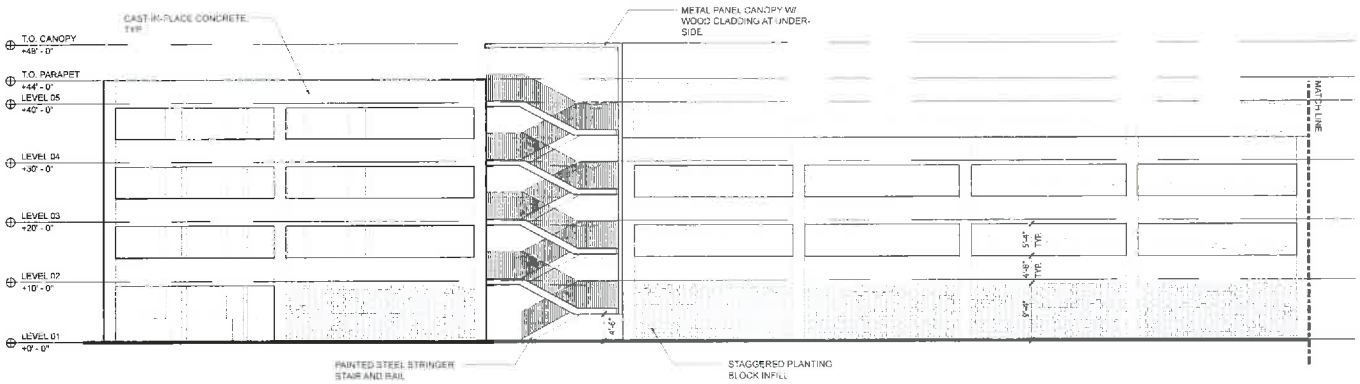
Source: Gensler, March 2016.

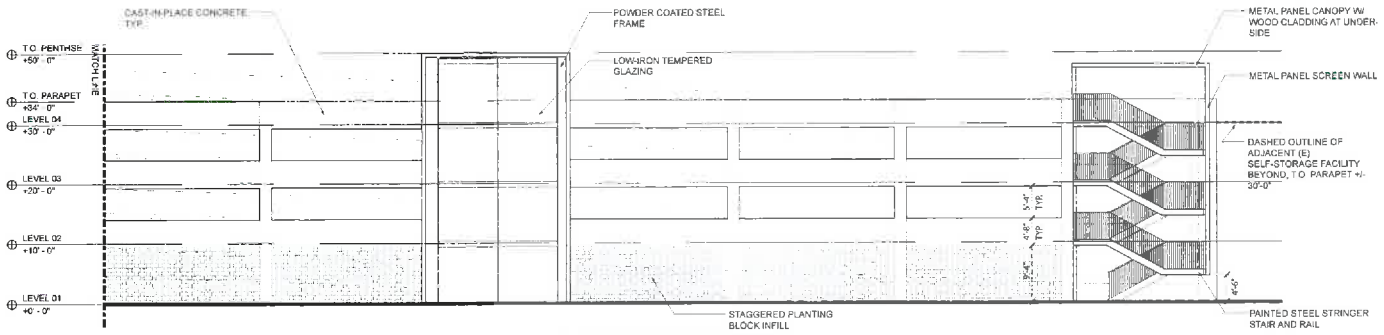
EcoTierra

Figure II-11
Building Sections



2 ELEVATION - SOUTH



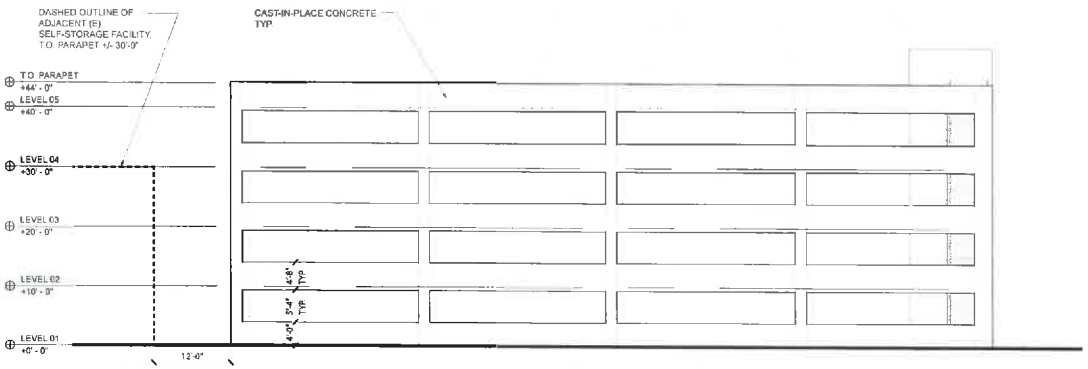


1 ELEVATION - WEST (COURTYARD)

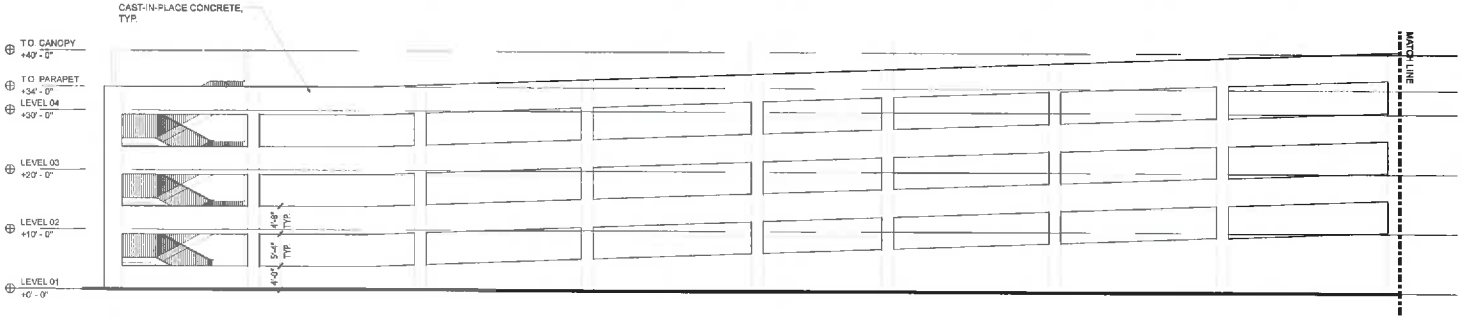
Source: Gensler, March 2016.

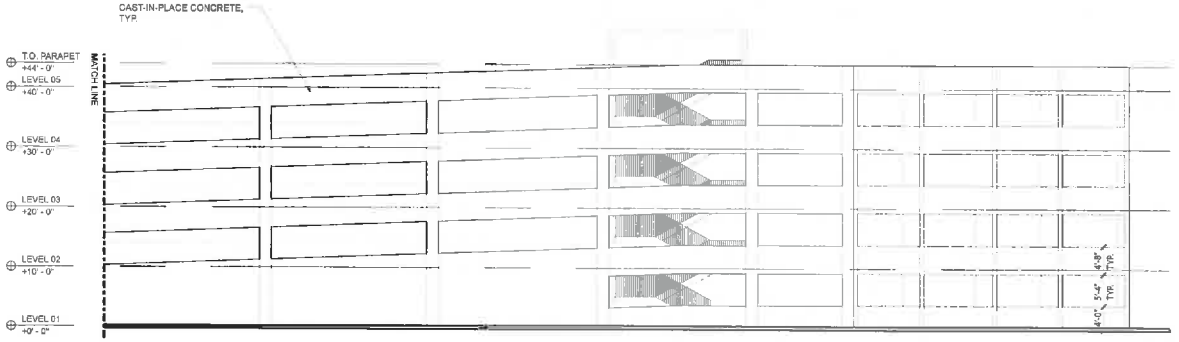
EcoTierra consulting

Figure II-12
Parking Structure Sections



2 ELEVATION - NORTH



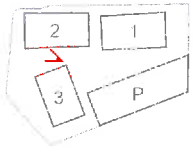


1 ELEVATION - EAST

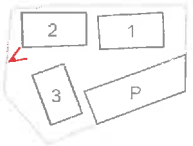
Source: Gensler, March 2016.

EcoTierra Consulting

Figure II-13
Parking Structure Sections



Source: Gensler, March 2016.



Source: Gensler, March 2016.

EcoTierra consulting

Figure II-15
Rendering of Building #2 at Alla Road Entry

Source: Gensler, March 2016.

EcoTierra consulting

Figure II-16
Rendering of Alla Road Entrance

Source: Gensler, March 2016.

1. Main Gate
2. Drop-off Zone
3. Main Plaza / Food Truck Area
4. Pavillion
5. Planting Area
6. Private Tenant Live/WorkSpace
7. Central Plaza with Kiosk
8. Semi-Private Area
9. Bike Racks and Furnishing
10. Walk
11. Bocce Ball Court
12. The Heart: Central Lawn
13. Table Tennis Corner
14. Outdoor Exercise Area
15. Lawn / Play Area + Hammocks
16. Turf Block
17. Open Seating
18. Planting Buffer
19. Italian Cypress Hedge
20. Parking (Tree/Parking Spot Ratio=1/4)
21. Monument Sign
22. Perimeter Fence
23. Fire Lane Header
24. Property Line
25. Trees to be Removed

Source: Gensler, March 2016.

A. Green Building Features

The Project would meet the requirements in the City's Green Building Code and California Energy/Title 24 requirements. The Project would include, at a minimum low-flow toilets, low-flow plumbing fixtures, electric vehicle (EV) parking, solar capability, and light-emitting diode (LED) lighting. The Project would also incorporate a grey-water system for use in on-site irrigation.

B. Access and Parking

Vehicular access to the Project Site would be provided via two driveways: one along Alla Road and a second one along Panama Street. Panama Street driveway is proposed to be located between Alla Road and Beethoven Street, along the northwest corner of the Project Site. The driveway would provide full vehicular access. The Alla Road driveway is proposed to be located along the small segment of Alla Road between Marina Freeway (SR-90) Westbound Off-Ramp and Panama Street. This driveway is proposed to provide full inbound access but limited to only right turns outbound because of its proximity to the intersection of Culver Boulevard and the SR-90 westbound off-ramp. Both driveways would be configured with one inbound and one outbound lane.

As shown in Table II-1, Vehicle and Bicycle Parking, the Project would provide 600 parking spaces. As required by the Los Angeles Municipal Code (LAMC), the Project is required to provide one parking space for every 500 square feet of commercial or business office. For the proposed 155,000 square feet of creative office space, the Project is required to provide a total of 310 parking spaces. The Project is providing parking above the City-requirement to assure that no occupants or visitors park within the adjacent residential community. Fifty-four parking spaces are proposed as surface parking and the remaining 546 spaces would be provided in a four-story above-grade parking structure. The parking structure is proposed to be located along the west boundary of the Project site, adjacent to the public storage facility.

Bicycle parking also would be provided for the office uses, as required by the LAMC. For the proposed 155,000 square feet of creative office space, the Project is required to provide 16 short-term and 31 long-term bicycle parking spaces for a total of 47 bicycle parking spaces. As shown in Table II-1, Vehicle and Bicycle Parking, 47 bicycle parking spaces would be provided for the Project. The bicycle parking spaces would be provided within the above-grade parking structure.

Table II-1
Vehicle and Bicycle Parking

Land Use	Vehicle Parking Required	Vehicle Parking Provided	Bicycle Parking Required	Bicycle Parking Provided
Office	310	600	47	47
Source: Fehr & Peers, 2016.				

Pedestrian and bicycle access to the Project Site would be provided via the two driveways. The Project is proposing to construct new sidewalks along the SR-90 Westbound Off-Ramp, Alla Road, and Panama Street.

C. Construction

The Project would be constructed over approximately 12 months. Construction activities would include the grading of the Project Site, excavation for the proposed buildings, and building construction. Demolition activities are anticipated to start in the fourth quarter of 2016, and completion is anticipated to be in the first quarter of 2018. The likely haul route would be Panama Street, Alla Road, and Culver Boulevard to the Marina Freeway.

5. DISCRETIONARY ACTIONS AND APPROVALS

The City of Los Angeles Department of City Planning is the lead agency for the Project. In order to permit development of the Project, the City may require approval of one or more of the following discretionary or ministerial actions:

- Vesting Tentative Tract Map No. 74073;
- Grading, excavation, and building permits; and
- Other permits, ministerial or discretionary, as may be necessary in order to execute and implement the project. Such approvals may include, but are not limited to landscaping plan approvals, permits for improvements in the public right-of-way and driveway curb cuts, storm water discharge permits, permits for temporary street closures, and installation and hookup approvals for public utilities and related permits.

Federal, state, and regional agencies that may have ministerial permit jurisdiction over some aspect of the Project include, but are not limited to:

- Regional Water Quality Control Board.
- South Coast Air Quality Management District.

6. RELATED PROJECTS

Section 15063(b) of the State CEQA Guidelines requires that Initial Studies consider the environmental effects of a proposed project individually as well as cumulatively. Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (CEQA Guidelines Section 15130 [b][1][A]).

All proposed (those with pending applications), recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project are included in this Initial Study. For an analysis of the cumulative impacts associated with these related projects and the Project, cumulative impact discussions are provided under each individual environmental impact category in Section IV (Environmental Impact Analysis) of this Initial Study.

The list of 14 projects (see Table II-2, List of Related Projects) includes all approved, under construction, proposed, or reasonably foreseeable projects within the Study Area that are expected to be completed by the anticipated Project buildout and occupancy.

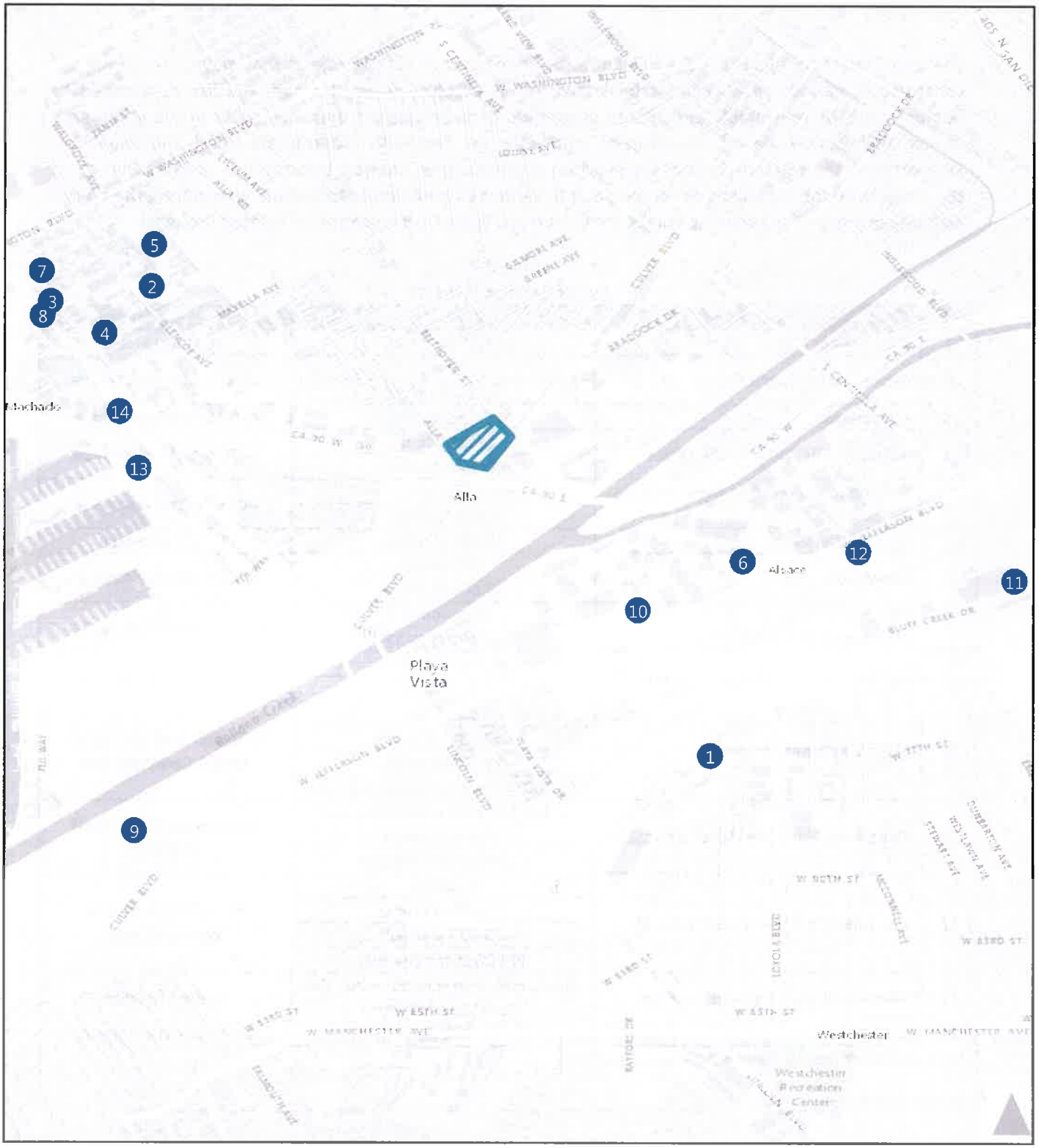
The list of related projects is not intended to be an exhaustive list of projects that may occur during the construction period, which cannot be known in an absolute way. Instead, the list is intended to demonstrate the reasonably anticipated magnitude of development that may occur in the study area during this period based on projects currently on file with appropriate local municipalities. Furthermore, the related projects list provides a conservative analysis because it is unlikely that all of the projects on the list will be developed due to various circumstances that could arise during the typical planning process. The related projects are shown on Figure II-19 (Location of Related Projects).

Table II-2
List of Related Projects

#	Project Name	Land Use	Location
1	LMU Master Plan	7,800 students	1 LMU Drive
2	New Apartment and Office	67 du 3,211 sf office	4140 S. Glencoe Avenue
3	Apartments	51 du	4090 S. Del Rey Avenue
4	Mixed-Use Residential and Office	136 condo du 20,000 sf office	4210 S. Del Rey Avenue
5	Condominium and Commercial Office Building	67 du 7,525 sf office	4091 Redwood Avenue
6	12777 Jefferson	49,950 sf office	12777 Jefferson
7	Mixed-Use	230 units 19,000 sf office	4040 S. Del Rey Avenue
8	Mixed-Use (Residential and Retail)	80 condo du 15,100 sf retail	4363 S. Lincoln Boulevard
9	Ballona Wetlands Restoration Project	46,000 sf Urban Ecology Center 600 acre ecological reserve	1 Marina Expressway
10	Playa Vista Phase I	3,246 du 1,570,000 sf office 25,000 sf retail 65,000 sf community serving uses	Jefferson Blvd b/t Lincoln Blvd & Centinela Ave
11	Playa Vista Plant Site (Spruce Goose)	1,129,900 sf of production and staging support 57,200 sf of office use	Campus Center Dr/Bluff Creek Dr
12	The Village at Playa Vista (Phase III)	2,600 du 17,500 sf office 15,000 sf retail 40,000 sf commercial	s/o Jefferson Blvd & Westlawn Ave
13	Marina Del Rey Local Coastal Plan	Development contained within the Local Coastal Plan	Marina Del Rey
14	MDR Tower	158 du	4363 Lincoln Boulevard

Note: sf = square feet; du = dwelling units

Source: Fehr & Peers, 2016.



Related Projects

Project Site

Source: Fehr & Peers, March 2016.

EcoTierra consulting

Figure II-19
Location of Related Projects

III. INITIAL STUDY CHECKLIST

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	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 SECTION IV OF THIS INITIAL STUDY, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN SECTION IV FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
I.	**AESTHETICS**				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	☐	☐	☐	☒
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	☐	☐	☐	☒
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	☐	☐	☒	☐
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	☐	☐	☒	☐
II.	**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?	☐	☐	☐	☒
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	☐	☐	☐	☒
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?	☐	☐	☐	☒
III.	**AIR QUALITY**				
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	☐	☐	☒	☐
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	☐	☐	☒	☐
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	☐	☐	☒	☐
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	☐	☐	☒	☐
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	NUMBER OF PEOPLE?				
IV.	**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?	❑	❑	❑	☒
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?	❑	❑	❑	☒
c.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (INCLUDING, BUT NOT LIMITED TO, MARSH VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?	❑	❑	❑	☒
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	❑	☒	❑	❑
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	❑	☒	❑	❑
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	❑	❑	❑	☒
V.	**CULTURAL RESOURCES**				
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	❑	❑	❑	☒
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	❑	☒	❑	❑
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	❑	❑	☒	❑
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	❑	❑	☒	❑
VI.	**GEOLOGY AND SOILS**				
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING:				
i.	RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.	❑	❑	❑	☒
ii.	STRONG SEISMIC GROUND SHAKING?	❑	❑	☒	❑
iii.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	❑	☒	❑	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
iv.	LANDSLIDES?	☐	☐	☐	☒
b.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	☐	☐	☒	☐
c.	BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE?	☐	☒	☐	☐
d.	BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY?	☐	☐	☒	☐
e.	HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	☐	☐	☒	☐
VII.	**GREENHOUSE GAS EMISSIONS**				
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	☐	☐	☒	☐
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	☐	☐	☒	☐
VIII.	**HAZARDS AND HAZARDOUS MATERIALS**				
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	☐	☐	☒	☐
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?	☐	☒	☐	☐
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	☐	☐	☒	☐
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	☐	☐	☒	☐
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	☐	☐	☐	☒
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	☐	☐	☐	☒
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
h.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	❑	❑	❑	☒
IX.	**HYDROLOGY AND WATER QUALITY**				
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	❑	❑	☒	❑
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)?	❑	❑	☒	❑
c.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	❑	❑	☒	❑
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	❑	❑	☒	❑
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	❑	❑	☒	❑
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	❑	❑	☒	❑
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	❑	❑	❑	☒
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	❑	❑	❑	☒
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	❑	❑	☒	❑
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	❑	❑	❑	☒
X.	**LAND USE AND PLANNING**				
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	❑	❑	❑	☒
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?	❑	❑	☒	❑
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	❑	❑	❑	☒
XI.	**MINERAL RESOURCES**				
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?	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	❑	❑	❑	☒
XII.	**NOISE**				
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?	❑	❑	☒	❑
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	❑	❑	☒	❑
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	❑	☒	❑
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	❑	☒	❑
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	☒	❑
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	❑	☒
XIII.	**POPULATION AND HOUSING**				
a.	INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE)?	❑	❑	☒	❑
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒
XIV.	**PUBLIC SERVICES** WOULD THE PROJECT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENT 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 OBJECTIVE FOR ANY OF THE FOLLOWING PUBLIC SERVICES:				
a.	FIRE PROTECTION?	❑	❑	☒	❑
b.	POLICE PROTECTION?	❑	❑	☒	❑
c.	SCHOOLS?	❑	❑	☒	❑
d.	PARKS?	❑	❑	☒	❑
e.	OTHER PUBLIC FACILITIES?	❑	❑	☒	❑
XV.	**RECREATION**				
a.	WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?	❑	❑	☒	❑
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI.	**TRANSPORTATION/CIRCULATION**				
a.	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?	❑	☒	❑	❑
b.	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?	❑	❑	☒	❑
c.	RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	❑	❑	❑	☒
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	❑	❑	☒	❑
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	❑	❑	❑	☒
f.	CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	❑	❑	❑	☒
XVII.	**UTILITIES**				
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	❑	❑	☒	❑
b.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	❑	❑	☒	❑
c.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	❑	❑	❑	☒
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	❑	❑	☒	❑
e.	RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?	❑	❑	☒	❑
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	❑	❑	☒	❑
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	❑	❑	☒	❑
XVIII.	**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	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?				
b.	DOES THE PROJECT HAVE IMPACTS 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).	❑	❑	☒	❑
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	❑	❑	☒	❑

Mitigation Measures

Biological Resources

MM 4-1 The Project would result in the removal of vegetation and disturbances to the ground and, therefore, may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treat Act (MBTA) of 1918 (50 CFR Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA).

- Proposed project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding bird season which generally runs from March 1 to August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

  a. Arrange for weekly bird surveys to detect any protected any native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.

  b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

  c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and

construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

MM 4-2 Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site within the adjacent public right(s)-of-way.

MM 4-3 All significant (8-inch or greater trunk diameter, as measured 4.5 feet/54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

MM 4-4 Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All new trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Cultural Resources

MM 5-1 Prior to issuance of a grading permit, evidence shall be provided for placement in the Project file that a certified Native American monitor has been retained. During ground-disturbing grading or excavating construction activities, a certified Native American monitor of Gabrieleno descent shall observe and monitor sub-surface activities.

Geology and Soils

MM 6-1 Prior to the issuance of the grading permit, the Project design consultant shall demonstrate the incorporation of the recommendations set forth in the Geotechnical Investigation prepared by the geotechnical consultant for the Project, subject to the review and approval of the City of Los Angeles Department of Building and Safety.

Greenhouse Gas Emissions

MM 7-1 Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable.

To encourage carpooling and the use of electric vehicles by Project occupants and visitors, at least 20 percent of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location,

shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate that the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Hazards and Hazardous Materials

MM 8-1 If any visual or olfactory indication of potentially contaminated soil, groundwater and/or toxic materials is encountered during excavation, grading or foundation construction activities, activities shall be temporarily halted. The City of Los Angeles and other appropriate agencies shall be contacted for consultation on the appropriate level of mitigation of the contamination (e.g., excavation and disposal, or treatment in-situ (in-place)) to be implemented so as so render the site suitable for construction activities to resume.

Transportation and Traffic

MM 16-1 A construction work site traffic control plan shall be submitted to DOT's Central District Office for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.

The review and approval of the site plan for driveway dimension, access and circulation scheme, shall be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, @ 213-482-7024) to avoid delays in the building permit approval process.

All driveways shall be Case 2 driveways and 30 feet for two-way operations and 16 feet wide for one-way operations.

All pick-up and drop-off activities shall take place on-site.

MM 16-2 Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc>) from work space and vehicular traffic, and overhead protection, due to sidewalk closure.

Temporary pedestrian facilities should be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

Covered walkways should be provided where pedestrians are exposed to potential injury from falling objects.

MM 16-3 Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk

shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

MM 16-4 The following conditions are recommended by LADOT:

Covenant and Agreement. Pursuant to Section 5.B of the CTCSP, the owner(s) of the property must sign and record a Covenant and Agreement prior to issuance of any building permit, acknowledging the contents and limitations of this Specific Plan in a form designed to run with the land.

Transportation Impact Assessment (TIA) Fee. Pursuant to Section 6 of the CTCSP, an applicant for a project within the Specific Plan area, except as exempted, shall pay, or guarantee payment of, a TIA Fee prior to issuance of any building permit. In accordance with this directive, the project shall remit payment of the applicable TIA fee amount prior to issuance of any building permit.

Transportation Demand Management (TDM). Pursuant to Section 5G of the CTCSP, the applicant shall submit a Transportation Demand Management (TDM) Program Plan to DOT for review and approval. The project must also comply with Section 12.26.J (Ordinance No. 168,700) of the Los Angeles Municipal Code which requires specific TDM and trip reduction measures. To the extent possible, the TDM plan should include opportunities for coordination with area adjacent Transportation Management Organizations (TMO's) including Playa Vista and the Howard Hughes Center.

Highway Dedication and Physical Street Improvements. Pursuant to Section 5.D.2 of the CTCSP, the applicant may be required to make highway dedications and improvements.

1. Alla Road is designated as a Local Standard, along the project frontage, in the newly adopted Mobility Element of the City's General Plan. Street Standard Plan S-470-1 dictates that the Local Standard Street cross-section should consist of a 36-foot roadway width within a 60- foot right-of-way or an 18-foot half roadway width within a 30-foot half right-of-way. Alla Road currently provides an 83-foot right-of-way along the project and appears to currently consist of a 15-foot half roadway width within a 22-foot half right-of-way. Therefore, a final determination regarding the appropriated dedication and widening needed, per the defined street standards, is required.

2. Panama Street is designated as a Standard Local street in the newly adopted Mobility Element of the City's General Plan. Street Standard Plan S-470-1 dictates that the crosssection for a Standard Local Street is a 36-foot roadway width within a 60-foot right-of-way or an 18-foot half roadway width within a 30-foot half right-of-way width. The current rightof- way width along Panama Street appears to be 60-feet with a variable width roadway therefore, a final determination regarding the appropriated dedication and widening needed, per the defined street standards, is required.

3. The project Marina Expressway frontage is under the jurisdiction of Caltrans. The project shall be responsible for consulting with the Caltrans District 7 office to determine any possible dedication or improvement requirements for this frontage of the project.

All un-improved sidewalk area surrounding the project site shall be improved by the project. The applicant should check with the Bureau of Engineering's (BOE)

Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project. These requirements must be guaranteed before issuance of any building permit through the B-permit process of the Bureau of Engineering, Department of Public Works. They must be constructed prior to issuance of any certificate of occupancy to the satisfaction of DOT and the Bureau of Engineering.

Parking Requirements. The project is proposing to provide 627 parking spaces, 59 spaces are proposed as surface parking and the remaining 568 spaces will be provided in a 4-level above-grade parking structure. The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for the project.

Construction Impacts. DOT recommends that a construction work site traffic control plan be submitted to DOT's Western District Office for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours.

Site Access and Internal Circulation. This determination does not include approval of the driveways, internal circulation and parking scheme. Adverse traffic impacts could occur due to access and circulation issues. The applicant is advised to consult with DOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site/driveway plans, at a scale of at least 1" = 40', separately to DOT's WLA/Coastal Development Review Section at 7166 West Manchester Avenue, Los Angeles 90045 as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety. In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts, for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. New driveway should be Case 2 driveways and 30 feet and 16 feet width for two-way and one-way operations, respectively.

Development Review Fees. An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT to permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

MM 6-5 The following conditions are recommended by the City to minimize construction impacts:

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- The applicant shall be limited to no more than two trucks at any given time within the site's staging area.

- There shall be no staging of hauling trucks on any streets adjacent to the project, unless specifically approved as a condition of an approved haul route.
- No hauling shall be done before 9 a.m. or after 3 p.m.
- Trucks shall be spaced so as to discourage a convoy effect.
- On substandard hillside streets, only one hauling truck shall be allowed on the street at any time.
- A minimum of two flag persons are required. One flag person is required at the entrance to the project site and one flag person at the next intersection along the haul route.
- Truck crossing signs are required within 300 feet of the exit of the project site in each direction.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times shall provide reasonable control of dust caused by wind.
- Loads shall be secured by trimming and watering or may be covered to prevent the spilling or blowing of the earth material.
- Trucks and loads are to be cleaned at the export site to prevent blowing dirt and spilling of loose earth.
- No person shall perform grading within areas designated "hillside" unless a copy of the permit is in the possession of a responsible person and available at the site for display upon request.
- A log documenting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times.
- The applicant shall identify a construction manager and provide a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.

Project Design Features

Public Services - Fire

PDF 14-1 The Project would implement the following project design features (PDF) to minimize the potential for impacts during construction and operation. The PDFs would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

PDF 14-2 The Project shall comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the Project design shall incorporate the standards and requirements as set forth by Title 24, the City of Los Angeles Safety Element, the LAMC Fire Code, and any additional code requirements established by the LAFD relative to fire prevention, safety, suppression, and emergency access and response.

PDF 14-3 The Project applicant shall submit a plot plan for approval of access and hydrants by the LAFD prior to the issuance of a building permit by the City. The plot plan shall include fire prevention and access features to the satisfaction of the LAFD, including the following standard requirements:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet visual line of site of the main entrance stairwell or to the satisfaction of the LAFD.
- Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
- All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
- All structures shall be fully sprinklered pursuant to LAMC Section 57.09.07(A).
- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel.

Public Services - Police

PDF 14-4 The Project shall comply with the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the Project would:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
  - Monitoring entrances and exits;
  - Managing and monitoring fire/life/safety systems; and
  - Controlling and monitoring activities in the parking facilities.
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;

- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed "dead zones."

PDF 14-5 Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, the Applicant or its successor shall develop an Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by LAPD.

Utilities and Service Systems

PDF 17-1 The Applicant or its successor shall install new water meters as required.

PDF 17-2 The Project shall include water conservation features in accordance with Title 24 of the California Code of Regulations (CCR).

PDF 17-3 The Applicant or any applicable successor shall install plumbing and plumbing fixtures that meet the following requirements:

- Toilets. All toilets installed shall be high efficiency fixtures. The maximum flush volume for high efficiency toilets shall not exceed 1.1 gallons per flush (effective).
- Urinals. All urinals installed shall be, at a minimum, high efficiency fixtures. The maximum flush volume of high efficiency urinals shall not exceed 0.125 gpf. Waterless urinals shall be utilized wherever possible.

PDF 17-4 Faucets. All faucets in public restrooms must be self-closing. The flow rate for all indoor faucets shall be 2.2 gpm except as follows:

- The maximum flow rate for commercial use kitchen faucets shall be 1.8 gpm.

PDF 17-5 The Applicant shall not use single pass cooling systems. Single-pass cooling systems are strictly prohibited for use in devices, processes, or equipment installed in commercial, industrial, or multi-family residential buildings. This prohibition shall not apply to devices, processes, or equipment installed for health or safety purposes that cannot operate safely otherwise.

PDF 17-6 The Applicant or its successor shall use rotating sprinkler nozzles landscape irrigation with a maximum flow rate of 0.5 gpm;

PDF 17-7 The Applicant or its successor shall use drought tolerant and native plants for 30 percent of total landscaping.

PDF 17-8 The Applicant or its successor shall use drip/subsurface irrigation (Micro-Irrigation), weather-based irrigation controller, landscaping contouring to minimize precipitation runoff, micro-spray, water-conserving turf (if applicable), and zoned irrigation.

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology – Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the Project Site, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the Applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The Project as identified in the project description may cause potentially significant impacts on the environment. Therefore, this environmental analysis concludes that an Environmental Impact Report shall be prepared to address all potential adverse impacts on the environment.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the Major Projects & EIR Section, Room 750, City Hall.

For City information, addresses, and phone numbers: visit the City's website at http://www.lacity.org; City Planning- and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or Major Projects & EIR Section, City Hall, 200 N Spring Street, Room 750. Seismic Hazard Maps – http://gmw.consrv.ca.gov/shmp/ Engineering/Infrastructure/Topographic Maps/Parcel Information – http://boemaps.eng.ci.la.ca.us/index0.1htm or City's main website under the heading "Navigate LA."

PREPARED BY:	TITLE:	TELEPHONE NO.:	DATE:
Jenna Monterrosa	City Planning Associate	(213) 998-1377	August 4, 2016

IV. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in Section III (Initial Study Checklist). The thresholds of significance are based on the practices of the City of Los Angeles (the "City"), the *L.A. CEQA Thresholds Guide*, and other sources as noted.

IMPACT ANALYSIS

1. AESTHETICS

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

No Impact. For the purpose of this issue, a significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on a scenic vista shall be made considering the following factors:

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

The Project Site is relatively flat, with a slight slope of approximately 0.005 percent toward the northwest. The Project Site comprises approximately 5.73 acres, and is currently vacant. A chain-link fence prohibits access to the Project Site.

There are currently no scenic vistas visible from or immediately adjacent to the Project Site due to the location within a developed area and relatively flat topography. There are no prominent topographic features on the Project Site from which scenic vistas could be viewed. Similarly, views of the mountains or ocean are not readily available from the Project Site (see Figures II-5 and II-6 in Section II, Project Description).

The Project would involve the construction of a 155,000-square-foot creative office campus with a separate above-grade parking structure. The Project would involve the construction of three two-story office buildings. Two of the buildings would be 55,000 square feet with an approximate height of 33-40 feet and one building would be 45,000 square feet with an approximate height of 37-40 feet. Parking for the office uses would be provided in 54 uncovered surface parking spaces and a four-story (approximately 44 feet high) parking structure with 546 parking spaces. The proposed building heights would range from approximately 33 feet up to 44 feet from grade, which is an increase compared to

existing structures within the Project Site area, particularly the existing residential uses to the north. However, the Project would not obstruct any existing scenic vistas because no scenic vistas are currently available. Therefore, no impact would occur and no mitigation measures are required.

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

No Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur only if scenic resources would be damaged and/or removed by development of a project within a State scenic highway.

There are no scenic resources, including scenic trees, rock outcroppings, or historic buildings on the Project Site. There are no State-designated or eligible-for-designation scenic highways in the Project Site vicinity.[1] The only City-designated scenic highway in the Project Site vicinity is a portion of Culver Boulevard between Vista Del Mar and Ballona Creek,[2] which is to the west of the Marina Freeway. The designated portion of Culver Boulevard, Ballona Creek, and the Ballona Wetlands Ecological Reserve are not visible from the Project Site because views are blocked by the Marina Freeway. Therefore, no impact would occur and no mitigation measures are required.

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

Less-Than-Significant Impact. For the purpose of this issue, a significant impact may occur if a project introduced incompatible visual elements on a project site or visual elements that would be incompatible with the character of the area surrounding a project site.

General Character Significance Methodology

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant aesthetic impact shall be made considering the following factors:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which the project would contribute to the area's aesthetic value; and

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1 *California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/langeles.htm, accessed: December 24, 2015.*

2 *City of Los Angeles Department of City Planning, Mobility Plan 2035, An Element of the General Plan, Appendix B: Inventory of Designated Scenic Highways and Guidelines.*

- Applicable guidelines and regulations.

The Project Site is located in the developed area of Del Rey and is currently vacant. The Project Site is surrounded by one- to two-story single-family residences to the north and commercial land uses to the northeast and west, ranging from two to four stories high. A three-story self-storage facility borders the Project Site to the southeast. The Marina Freeway is located to the south of the Project Site.

The proposed buildings would be two to four stories high. As such, the Project represents a change to the visual character of the Project Site and surrounding area. The following discussion addresses the extent and significance of the change to the visual character resulting from the development of the Project.

Height

The proposed office buildings would extend up to a maximum height of approximately 40 feet from grade (two stories) and the proposed parking structure would extend up to a maximum height of approximately 44 feet from grade (four levels). The Project would represent an improvement in the visual character of the Project Site and surrounding area as it would develop a site that previously contained five vacant commercial buildings in various states of disrepair, with a new modern 155,000-square-foot creative office campus with a separate above-grade parking structure (see Figures II-3 and II-4 [Views of Project Site] in Section II [Project Description]). The height of the proposed buildings are generally comparable to the heights of existing four-story commercial buildings in the immediate Project area, particularly to the east along, Alla Road, and to the south, along Culver Boulevard. The Project's overall height would not constitute a substantial degradation of the visual character and quality of the Project Site and surrounding area. Therefore, the visual character impact associated with the proposed building's height would be less than significant and no mitigation measures are required.

Massing

With respect to massing, the existing buildings in the vicinity of the Project Site extend from one to four stories high. The Project would result in the construction of a 155,000-square-foot creative office campus, and as the Project Site is currently vacant, the Project would, thereby, increase the building mass on the Project Site. The area surrounding the Project Site includes buildings of generally similar mass, particularly to the east, along Alla Road, and, to the south, along Culver Boulevard. Moreover, similar building mass exists in the Project vicinity including existing commercial buildings generally located between McConnell Avenue and Marina Freeway to the east, and Glencoe Avenue and the Marina Freeway to the west (See Figure II-2 [Aerial Photo of Site and Surrounding Land Uses], View 8 in Figure II-5 [Photos of Surrounding Land Uses], and View 10 in Figure II-6 [Photos of Surrounding Land Uses] in Section II [Project Description].) Thus, the Project would not introduce building massing that would be out of character with the existing development in the area. Considering the existing developed environment and surrounding area, the proposed massing of the Project would not result in a substantial change to the visual character or the quality of the site or its surroundings. Therefore, the visual character impact associated with building mass would be less than significant and no mitigation measures are required.

Design

The office buildings would be designed in a modern architectural style that utilizes a natural palette that references the proximity to the beach and the Ballona Wetlands. The buildings would include extensive

fenestration and windows including several second floor balconies and ground floor private patios with roll-up doors. One of the main features of the Project Site would be a highly improved landscaped common area that creates an inviting open space that draws inspirations from the vegetation of the Ballona Wetlands. The Project would include a central lawn area, with a bocce ball court, a table tennis corner, outdoor exercise area, and outdoor open seating work areas (see Figures II-14 through II-17 [Project Renderings] in Section II [Project Description]). Approximately 14 trees would be planted in the surface parking lots, which is a ratio of one tree for every four parking spaces (54 surface parking spaces are proposed). Therefore, the Project's design would improve the visual character and quality of the Project Site and complement the surrounding area. The visual character impact associated with Project design would be less than significant and no mitigation measures are required.

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. For the purpose of this issue, a significant impact may occur if a project introduces new sources of light or glare on or from a project site that would be incompatible with the surrounding area, or that pose a safety hazard to motorists utilizing adjacent streets. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant nighttime illumination impact shall be made considering the following factors:

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

Light

The Project is is located in a well-lit area of the City where there are moderate levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to populated areas. As development surrounding the Project Site is already impacted by lighting from existing development within the area, the amount of new light sources must be highly visible in the field of view of light-sensitive uses to have any notable effect.

Night lighting for the Project would be provided to illuminate building vehicular and pedestrian entrances, signs, and security. Lighting would be low-level and ground- and/or building-mounted fixtures. As the Project Site is currently vacant, the Project would have the potential to alter lighting patterns in the area of the Site. Surrounding land uses that would be sensitive to increases in ambient illumination include the multi-family residences located west of the Project Site. Although the amount of light emanating from the Project would represent an increase over current light levels, Los Angeles Municipal Code (LAMC) Section 12.22.A.23(a)(5) requires the following:

> *All public areas of the lot or lots not covered by a building shall have night lighting for safety and security. All other open exterior areas, such as walkways and trash areas, shall have low-level, security-type lighting. All exterior lighting shall be directed onto the lot or lots, and all flood lighting shall be designed to eliminate glare to adjoining properties. All parking areas shall have a minimum of ¾-foot-candle of flood lighting measured at the pavement.*

Additionally, headlights from vehicles entering and exiting the Project's parking area at night would be an increased source of light at the Project Site due to the greater intensity of use compared to the vacant lot. However, the amount of light from vehicle headlights would not directly shine upon any nearby light-sensitive land use. Therefore, the impact from the Project's lighting would be less than significant and no mitigation measures are required.

Glare

Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include vehicles traveling and parked on streets and exterior building windows. Receptors sensitive to daytime glare from reflected sunlight include motorists traveling on the roadways, and residential uses located along Panama Street. The Project Site is currently vacant and there are no sources of glare. The Project would have both solid and glass surfaces. The building materials would be primarily concrete with wood and metal accents. However, the proposed materials do not included highly reflective surfaces, such as polished metal or mirrored glass. Therefore, the impact potential sources of glare would be less than significant and no mitigation measures are required.

Shade and Shadows

The issue of shade and shadow pertains to the effect of shadows cast upon adjacent areas by proposed structures. The effects of shading are site specific.

As described in the *L.A. CEQA Thresholds Guide*, shadow effects are dependent upon several factors, including the local topography, the height and bulk of a project's structural elements, sensitivity of adjacent land uses, season, and duration of shadow projection. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These land uses are considered to be sensitive because sunlight is important to function, physical comfort, or commerce.

As described in the *L.A. CEQA Thresholds Guide*, for the purpose of this issue, a significant impact would occur if a project introduced light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest, or northeast.

The tallest of the Project's proposed buildings would be 44 feet tall from grade. Therefore, as the Project is less than 60 feet high, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6, [Related Projects]) with respect to the topics listed in the aesthetics analysis above, including views, scenic resources, shade/shadow, etc. The cumulative impacts aesthetics study area is the extent of the Project's viewshed. The Marina Freeway blocks southern and eastern views from and to the Project Site; therefore, the Project's viewshed includes that which can be seen from the north and west. The nearest related projects within the Project's viewshed are Related Project

Nos. 2, 3, 4, 5, 7, and 8, which are located approximately 0.75 to 1.0 mile to the northwest. As the Project vicinity is a developed area, there are numerous existing buildings of varying heights and mature vegetation including tall trees with dense foliage obstructing the view between the Project Site and the related projects. As such, the nearest related projects are not within a clear viewshed of the Project Site. The Project's viewshed, therefore, would not be substantially impacted by development of the related projects, and the related projects would not combine with the Project to result in a cumulative aesthetic impact. Additionally, any future development clearly within the Project's viewshed are reasonably expected to occur in accordance with adopted plans and regulations, such as LAMC Section 12.22.A.23(a)(5), and be subject to the review and approval of the Department of City Planning prior to issuance of grading permits. Any approvals granted to future development project, including the listed related projects in Section II.6 (Related Projects), are reasonably anticipated to allow landscape and signage that would be aesthetically compatible with the surrounding neighborhood. As discussed above, the Project would result in less-than-significant impacts to aesthetics and would improve the existing visual character and quality of the Project Site. Considering all of the above, the cumulative aesthetic impact would be less than significant.

2. AGRICULTURE AND FOREST 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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of State-designated Farmland to a non-agricultural use.

The Project Site is located in the Del Rey community. The Project Site is currently vacant. According to the State's Farmland Mapping and Monitoring Program's most recent farmland mapping data for Los Angeles County, neither the Project Site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[3] Moreover, according to the Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture's Natural Resources Conservation Service, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[4] Therefore, no impact would occur and no mitigation measures are required.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

The Project Site is located within the jurisdiction of the City and is, therefore, subject to the applicable land use and zoning requirements in LAMC, particularly Chapter 1, General Provisions and Zoning (the

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[3] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, published January 2015.*

[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Los Angeles County, updated August 31, 2009.*

Planning and Zoning Code). The Planning and Zoning Code includes development standards for the various districts in the City. The Project Site is zoned for industrial land uses. Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. Additionally, according to the State's most recent Williamson Act land data, neither the Project Site nor surrounding area are under a Williamson Act contract.[5] Therefore, no impact would occur and no mitigation measures are required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of land zoned 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)).

In the City, forestland is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or Timberland Production. The Project Site is currently zoned M1-1 and M2-1, which does not permit forestland, timberland, or Timberland Production land uses. Therefore, no impact would occur and no mitigation measures are required.

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

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the loss of forestland or conversion of forestland to non-forest use.

The Project Site is located in the developed Del Rey community. No forestland exists on or in the vicinity of the Project Site, and implementation of the Project would not result in the loss or conversion of forestland. Therefore, no impact would occur and no mitigation measures are required.

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 or conversion of forest land to non-forest use?

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project indirectly results in the conversion of farmland to non-agricultural use or conversion of forestland to non-forest use.

The Project Site is located in the developed Del Rey community. No State-designated farmland, agricultural uses, or forestland uses are located in the surrounding area of the Project Site. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forestland on- or off-site. Therefore, no impact would occur and no mitigation measures are required.

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[5] *State of California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, Data Submissions Current to 2014, published 2015.*

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6, [Related Projects]) with respect to the topics listed in the analysis above, including State-designated farmland, agricultural uses, and forest land uses. The cumulative impacts study area for agriculture and forestry resources is the extent of the related projects (see Figure II-19 [Location of Related Projects] in Section II [Project Description]). The Project Site and related projects are located in a developed area of the City, and none of these respective sites contain State-designated farmland.[6] Neither the Project Site nor the related projects are located on land currently used as agriculture or forest land, or on land zoned for agricultural uses or forest land, timberland, or Timberland Production. Thus, neither the Project nor the related projects would result in the conversion of existing agricultural uses or zoning to a non-agricultural use, nor result in the loss of forest land, timberland, Timberland Production or zoning, or the conversion of forest land to non-forest use. Therefore, there would be no cumulative impacts on agriculture and forestry resources.

3. AIR QUALITY

The following section summarizes and incorporates by reference the information provided in the *Air Quality Impact Analysis for the Panama/Alla Creative Campus Project,* by Cadence Environmental Consultants, dated April 2016 (Air Quality Report), which is provided as Appendix B to this Initial Study.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less-Than-Significant Impact. A significant air quality impact may occur if a project is 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.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the SCAQMD on December 7, 2012. This AQMP, referred to as the 2012 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2012 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The future air quality levels projected in the 2012 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by the Southern California Association of Governments (SCAG) in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted on April 4, 2012. The 2012 AQMP also assumes that general development projects will include strategies (mitigation measures) to reduce emissions generated during construction

[6] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, published January 2015.*

and operation in accordance with SCAQMD and local jurisdiction regulations which are designed to address air quality impacts and pollution control measures.

For general development projects, the SCAQMD recommends that consistency with the current AQMP be determined by demonstrating consistency with adopted local land use plan designations and/or population projections used in the development of the AQMP. Projects that are consistent with adopted local land use plan designations and/or applicable population projections would not interfere with air quality attainment because the growth of the Project is included in the projections utilized in the formulation of the 2012 AQMP. As such, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds. However, changing a land use designation that would result in more intensive growth and/or exceeding the AQMP population projections could jeopardize attainment of the air quality conditions projected in the AQMP and is considered to be a significant impact.

It is assumed that the Project would comply with all SCAQMD rules and regulations that are in effect at the time of development and that are applicable to the Project; the Project Applicant is not requesting any exemptions from the currently adopted or proposed rules.

The proposed office uses are also allowed under the City of Los Angeles' existing land use designations for the Project Site. Therefore, the Project would not exceed the growth projections of the AQMP, and, as such, would not conflict with the 2012 AQMP or jeopardize attainment of state and national ambient air quality standards in the area under the jurisdiction of the SCAQMD.

The Project would also be subject to the Los Angeles Green Building Code (Ordinance No. 182849), which adopted portions of the current California Green Building Standards (CALGreen) Code standards to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional and global ecosystems. Mandatory measures that would be applicable to the Project and that would help to reduce potential air pollutant emissions include the following:

- 99.05.106.5.3. Electric Vehicle (EV) Charging. Provide infrastructure to facilitate future installation of electric vehicle supply equipment (EVSE). EVSE and all devices related to EV charging shall be installed in compliance with the California Building Code Section 406.9, the California Electrical Code Article 625, and as follows:
    - 99,05,106.5.3.1. Charging Locations. Parking facilities shall have five (5) percent of the total parking spaces, but not less than one (1), capable of supporting future EVSE charging locations.
- 99.05.211.1. Solar Ready Buildings. Comply with Section 110.10 of the California Energy Code.

Based on this information, the Project would be consistent with the AQMP and the City of Los Angeles' efforts to reduce regional air pollutant emissions. The impact of the Project would be less than significant.

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

Less-Than-Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds, or if project-related emissions would

substantially contribute to an existing or projected air quality violation. To address potential impacts from construction and operational activities, the SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table IV-1, SCAQMD Thresholds of Significance, be considered significant. The City of Los Angeles defers to these thresholds for the evaluation of construction-related and operational air quality impacts.

Table IV-1
SCAQMD Thresholds of Significance

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO_x)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55

Note: lbs = pounds.

Source: SCAQMD CEQA Handbook, SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, accessed: April 20, 2016.

Mass Daily Regional Construction-Related Emissions

As discussed previously, construction of the Project is anticipated to begin in the fourth quarter of 2016 and take place over a period of approximately 18 months. Approximately 3,650 cubic yards of soil would be imported to the Project Site as part of the grading phase.

The analysis of mass daily regional construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod v. 2013.2.2), as recommended by the SCAQMD, with the assumption that the Project would comply with the fugitive dust control requirements of SCAQMD Rule 403. The mass daily construction-related emissions are shown in Table IV-2, Estimated Mass Daily Regional Construction Emissions. These emissions assume a worst-case scenario in which the full set construction equipment would be used each day throughout the entire construction phase. In reality, each piece of equipment would only be used for a portion of each day and there would be days when very little equipment is used.

As shown in Table IV-2, Estimated Mass Daily Regional Construction Emissions, the mass daily regional construction-related emissions generated during the project construction phase would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, this impact of the Project would be less than significant.

Table IV-2
Estimated Mass Daily Regional Construction Emissions

Year of Construction	Emissions in Pounds Per Day					
	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
2016	4.6	43.9	35.5	0.1	5.2	3.5
2017	52.8	59.5	61.3	0.2	7.4	4.5
SCAQMD Thresholds of Significance	75.0	100.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No

Notes: Construction emission calculations based on the construction phasing discussed previously in this report. Calculated PM_{10} and $PM_{2.5}$ emissions assume compliance with SCAQMD Rule 403 for fugitive dust. Fugitive dust control is required under Rule 403 and is not typical mitigation to reduce an otherwise significant environmental impact of this project. The emissions shown in this table are the mitigated overall construction emissions totals shown on page 4 of the CalEEMod results sheets. Dust control in CalEEMod is only allowed to be entered as mitigation even though it is required under Rule 403. No project-specific mitigation measures are identified for this project.
CalEEMod result sheets are provided in Appendix A of the Air Quality Report (Appendix B of this Initial Study).

Source: Cadence Environmental Consultants, 2016.

Mass Daily Regional Operational Emissions

Operational emissions generated by area sources, energy sources, and mobile sources would result from the increased amount of normal day-to-day activities at the Project Site after occupation. Area source emissions are generated by the operation of landscape maintenance equipment and the use of consumer products. Energy Sources are generated by the consumption of natural gas for heating and cooking.

The average daily operational emissions generated by the Project have been calculated using CalEEMod. The results of these calculations are presented in Table IV-3, Estimated Mass Daily Operational Emissions. As shown, the total operational emissions generated by the Project would not approach the operational thresholds of significance set by the SCAQMD. The actual net increase in regional operational emissions would be lower since the calculations shown in Table IV-3, Estimated Mass Daily Operational Emissions, do not account for any reduction associated with the existing uses at the Project Site. Therefore, impacts associated with regional operational emissions from the Project would be less than significant.

Table IV-3
Estimated Mass Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	8.3	<0.1	0.1	<0.1	<0.1	<0.1
Energy Demand	<0.1	0.4	0.3	<0.1	<0.1	<0.1
Mobile (Motor Vehicles)	5.3	15.4	62.0	0.2	11.4	3.2
Total Emissions	13.7	15.8	62.4	0.2	11.4	3.2
SCAQMD Thresholds of Significance	55.0	55.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No

Notes: The emissions shown in this table are the unmitigated overall operational emissions totals shown on page 6 of the CalEEMod results sheets. CalEEMod result sheets are provided in Appendix A of the Air Quality Report (Appendix B of this Initial Study).

Source: Cadence Environmental Consultants, 2016.

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

Less-Than-Significant Impact. A significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant.

Because the South Coast Air Basin is currently in nonattainment for ozone, nitrogen dioxide (NO_2), PM_{10} and $PM_{2.5}$, related projects may likely exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect 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 be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed above, the mass daily regional construction-related and operational emissions generated by the Project would not exceed any of the thresholds of significance recommended by the SCAQMD. Also, as discussed below, daily localized emissions generated by the Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants for which the Basin is in nonattainment. The cumulative air quality impacts associated with the Project would be less than significant.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less-Than-Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The nearest sensitive receptors to the Project Site are the single-family residences located to the north of the Project Site across Panama Street. There are no schools in close proximity to the Project Site.

The localized emissions of concern are NOx, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each Source Receptor Area (SRA) of the Basin and various distances from the source of emissions, and these LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards in the affected area. In the case of this analysis, the Project Site is located within SRA 2 (Northwest Coastal Los Angeles County) and the nearest residence is in close proximity to the site. Therefore, the LSTs for a five-acre acre site and receptors located within 25 meters are used to address the potential localized NOx, CO, PM_{10}, and $PM_{2.5}$ impacts to the area surrounding the Project Site.[7]

Localized Construction Emissions

Table IV-4, Estimated Daily Localized Construction Emissions, identifies the maximum daily emissions that are estimated to occur at the Project Site during the construction phases of the Project. As shown, emissions during the construction phases would not exceed the SCAQMD's LSTs for the specified pollutants. Therefore, impacts related to localized pollutant concentrations during construction would be less than significant.

[7] *The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters.*

Table IV-4
Estimated Daily Localized Construction Emissions

Construction Phase	Emissions In Pounds Per Day			
	NOx	CO	PM_{10}	$PM_{2.5}$
Site Grading				
On-site Emissions	38.5	26.1	4.7	3.3
SCAQMD Localized Thresholds	221.0	1,531.0	13.0	6.0
Significant Impact?	No	No	No	No
Building and Parking Structure Construction				
On-site Emissions	52.8	36.2	3.6	3.4
SCAQMD Localized Thresholds	221.0	1,531.0	13.0	6.0
Significant Impact?	No	No	No	No
Building Construction and Surface Parking Lot Paving				
On-site Emissions	46.7	32.8	2.9	2.8
SCAQMD Localized Thresholds	221.0	1,531.0	13.0	6.0
Significant Impact?	No	No	No	No
Building Construction and Architectural Coatings				
On-site Emissions	28.6	20.0	2.0	1.9
SCAQMD Localized Thresholds	221.0	1,531.0	13.0	6.0
Significant Impact?	No	No	No	No

Notes: Localized thresholds for construction emissions for a five-acre site at a receptor distance of 25 meters, as established by the SCAQMD for sites in SRA 2.
Calculated PM_{10} and $PM_{2.5}$ emissions assume compliance with SCAQMD Rule 403 for fugitive dust. Fugitive dust control is required under Rule 403 and is not typical mitigation to reduce an otherwise significant environmental impact of this project. The emissions shown in this table for the site grading phase are the mitigated construction on-site emissions totals shown on page 9 of the CalEEMod results sheets. Dust control in CalEEMod is only allowed to be entered as mitigation even though it is required under Rule 403. No project-specific mitigation measures are identified for this project.
The on-site emissions for building and parking structure construction are the combined unmitigated on-site emissions from pages 13 and 15 of the CalEEMod results sheets.
The on-site emissions for building and surface parking lot paving are the combined unmitigated on-site emissions from pages 13 and 18 of the CalEEMod results sheets.
The on-site emissions for building and architectural coatings are the combined unmitigated on-site emissions from pages 13 and 20 of the CalEEMod results sheets.
CalEEMod result sheets are provided in Appendix A of the Air Quality Report (Appendix B of this Initial Study).

Source: Cadence Environmental Consultants, 2016.

Localized Operational Emissions

The average daily localized operational emissions that would be generated at the Project Site are shown in Table IV-5, Estimated Daily Localized Operational Emissions, along with the applicable operational LSTs for SRA 2. As shown on-site operational emissions generated by the new office buildings would not

approach the established SCAQMD localized thresholds. Therefore, this impact would be less than significant.

In addition to the emissions generated at the Project Site, localized emissions would also be generated by vehicles traveling through nearby intersections. Traffic-congested roadways and intersections (Level of Service [LOS] D or worse) have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed CO "hotspots." The SCAQMD considers CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots.

The SCAQMD has recommended that a CO hotspot analysis should be conducted for intersections where the Project would have a significant traffic-related congestion impact causing the LOS to change to E or F or when a project increases the volume to capacity ratio (V/C) increases by 2% and the LOS is D or worse. It should be noted that these recommendations were formulated several years ago when the Basin was a nonattainment area for federal and state Co standards. The South Coast Air Basin is now in attainment of all applicable ambient CO standards and the maximum 1-hour concentration of 3.0 parts per million (ppm) and the maximum 8-hour concentration of 1.3 ppm measured within SRA 2 in 2014 (the most recent data available) are well below the 35.0 ppm federal and 20.0 ppm state 1-hour standards as well as the 9.0 federal and state 8-hour standard.

The Project is expected to result in a net increase of 777 vehicle trips per day. The *Transportation Report* prepared for the Project concludes that the traffic generated by the Project would not cause a significant impact at any of the intersections in the vicinity of the Project Site. As such, the increase in traffic associated with the Project would not be capable of increasing localized CO concentrations at intersections to levels that exceed federal and/or state standards. The impact of the Project would be less than significant.

Table IV-5
Estimated Daily Localized Operational Emissions

Emissions Source	Emissions in Pounds per Day			
	NOx	CO	PM_{10}	$PM_{2.5}$
Area Sources	<0.1	0.1	<0.1	<0.1
Energy Sources	0.4	0.3	<0.1	<0.1
Mobile Sources	0.2	0.6	0.1	<0.1
Total Emissions	0.6	1.0	0.1	<0.1
SCAQMD Thresholds of Significance	221.0	1,531.0	3.0	2.0
Significant Impact?	No	No	No	No

Notes: Localized thresholds for operational emissions for a five-acre site at a receptor distance of 25 meters, as established by the SCAQMD for sites in SRA 2.
The emissions shown in this table are the unmitigated operational area and energy emissions totals shown on page 6 of the CalEEMod results sheets.
Per LST methodology, only on-site mobile source emissions need be included. It is estimated that approximately 1.0 percent of the unmitigated mobile source emissions from page 6 of the CalEEMod results sheets would occur within the Project Site.
CalEEMod result sheets are provided in Appendix A of the Air Quality Report (Appendix B of this Initial Study).

Source: Cadence Environmental Consultants, 2016.

e) Would the project create objectionable odors affecting a substantial number of people?

Less-Than-Significant Impact. A project-related significant adverse effect could occur if construction or operation of the proposed project would result in generation of odors that would be perceptible in adjacent sensitive areas.

Operational 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 involves the construction and operation of new office buildings and a parking structure, which is not typically associated with odor complaints. As the Project involves no elements related to industrial projects, no objectionable odors are anticipated. Therefore, the potential operational impacts associated with objectionable odors would be less than significant.

Cumulative Impacts

Because the South Coast Air Basin is currently in nonattainment for ozone, NO_2, PM_{10}, and $PM_{2.5}$, other new projects in the local vicinity could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the Project contribution, the SCAQMD considers any construction-related and/or operational emissions from individual projects that exceed the project-specific thresholds of significance identified above to be considered cumulatively considerable. As discussed above, the maximum mass daily regional and localized construction-related and operational emissions associated with the Project would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants for which the Basin is in nonattainment. The cumulative air quality impacts associated with the Project would be less than significant.

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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is located in the developed Del Rey community, and is currently vacant. According to the *L.A. CEQA Threshold Guide*, the City encompasses a variety of open space and natural areas that serve as habitat for sensitive species. Much of this natural open space is found in or is adjacent to the foothill regions of the San Gabriel, Santa Susana, Santa Monica, and Verdugo Mountains, the Simi Hills, and along the coastline between Malibu and the Palos Verdes Peninsula. Many of the outlying areas are contiguous with larger natural areas, and may be part of significant wildlife habitats or movement corridors. The central and valley portions of the City contain fewer natural areas.[8] According to Exhibit C-5 of the *L.A. CEQA Threshold Guide*, the Project Site and immediately surrounding area are not identified as a biological resource area. Moreover, the Project Site is not within a designated or proposed Significant Ecological Area.[9]

The Project Site does not contain any habitat capable of sustaining 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. There are no known locally designated natural communities at the Project Site. Furthermore, the Project Site is not located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State or federally listed species.

The Ballona Wetlands Ecological Reserve and Ballona Creek are located on the opposite side of the Marina Freeway as the Project Site (approximately 1,250 feet). The Marina Freeway acts as a barrier between the Project Site and this designated natural community and water source.

Therefore, the Project would have no impact on sensitive biological species or habitat and no mitigation measures are required.

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- The alternation of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

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[8] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, pages C-1 – C-2.*

[9] *Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, website: http://planning.lacounty.gov/gisnet3, accessed: December 24, 2015.*

The Project Site is within a developed area. No riparian or other sensitive habitats are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Implementation of the Project would not result in adverse impacts to riparian habitat or other sensitive natural communities. Therefore, no impact would occur and no mitigation measures are required.

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat.

The Project Site is within a developed area, and is currently vacant. Review of the National Wetlands Inventory identified no protected wetlands in the immediate Project Site area.[10] The Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Therefore, no impacts to riparian or wetland habitats would occur with implementation of the Project and no mitigation measures are required.

d) Would the project 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?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in interference with wildlife movement or migration corridors that may diminish the chances for long-term survival of a sensitive species.

Due to the condition and location of the Project Site, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. However, there are non-native trees on the Project Site along Panama Street. These on-site trees were planted for landscaping purposes, and would be removed during construction of the Project. The trees, as well as other trees near the Project Site, could contain suitable habitat for nesting migratory birds that are protected under the federal *Migratory Bird Treaty Act* (MBTA). The MBTA, which is an international treaty ratified in 1918, protects migratory nongame native bird species (as listed in 50 C.F.R. Section 10.13) and their nests. Additionally, Section 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). The Project would be required to comply with these existing federal and state laws, MBTA and California Fish and Game Code, respectively. Nonetheless, Mitigation Measure 4-1 is recommended to reduce the potential impact to suitable habitat for nesting migratory birds.

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[10] *U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed: December 10, 2015.*

Mitigation Measure

In order to reduce the potential impact due to the loss of suitable habitat for nesting migratory birds, the following mitigation measure (MM) is recommended:

MM 4-1 The Project would result in the removal of vegetation and disturbances to the ground and, therefore, may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treat Act (MBTA) of 1918 (50 CFR Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA).

- Proposed project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding bird season which generally runs from March 1 to August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

  a. Arrange for weekly bird surveys to detect any protected any native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.

  b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

  c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

  d. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

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

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, 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, such as the City's Protected Tree Ordinance No. 177,404.

Trees protected under Ordinance No. 177,404 include Valley Oak, California Live Oak, and any other tree of the oak genus indigenous to California, excluding the Scrub Oak; Southern California Black Walnut; Western Sycamore; and the California Bay. None of these tree species occur at the Project Site. There is currently one non-native tree located on the Project Site, which is not protected by a tree preservation policy or ordinance.[11]

During construction of the Project, it is assumed that the one existing tree on the Project Site would be removed. The 12 City street trees (Trees 1 through 12 in Figure IV-1, Tree Location Map) located along the Panama Street would be retained. As such, a total of one tree would be removed during construction.

However, as the one tree to be removed meets the City's trunk diameter criterion for a significant tree, it would require replacement at a 1:1 ratio. Therefore, Mitigation Measures 4-2 through 4-4 are recommended to reduce this impact to a less-than-significant level.

Mitigation Measures

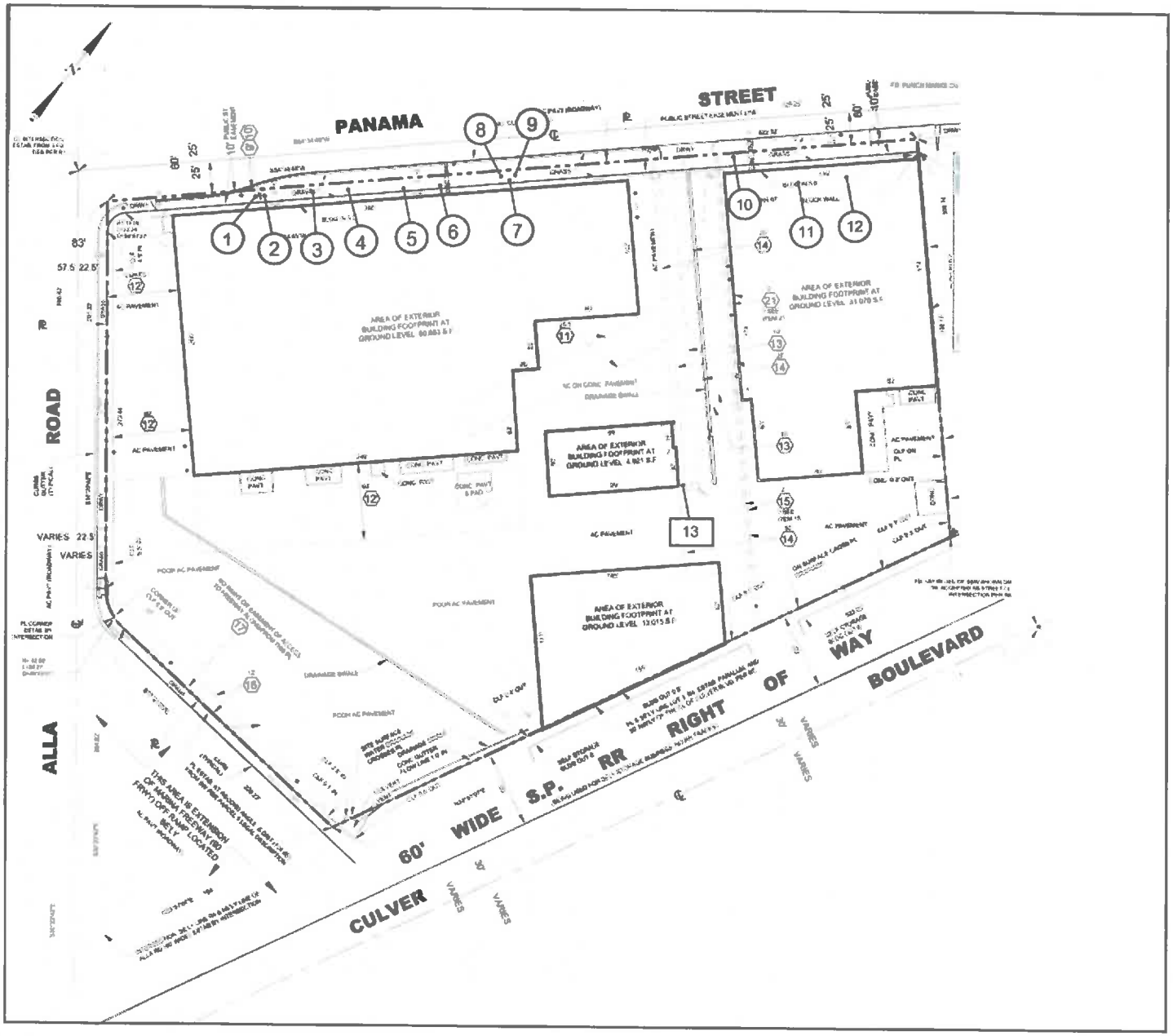
In order to reduce the impacts of the loss of existing significant trees during construction of the Project, the following mitigation measures (MM) are recommended:

MM 4-2 Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site within the adjacent public right(s)-of-way.

MM 4-3 All significant (8-inch or greater trunk diameter, as measured 4.5 feet/54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

MM 4-4 Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All new trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

[11] *Written correspondence from Cy Carlberg, Registered Consulting Arborist, Principal, Carlberg Associates, March 23, 2016 (See Appendix C to this Initial Study).*



Source: DCA Civil Engineering Group, March 2016.

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Figure IV-1
Tree Location Map

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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited.

The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6, [Related Projects]) with respect to the topics listed in the biological resources analysis above, including special status species and habitat, riparian habitat and sensitive natural communities, wetlands, wildlife movement, protected trees, etc. The cumulative impacts biological resources study area is the extent of the related projects.

As discussed above, the Project would not result in a potentially significant impact to biological resources. The Project Site and the related projects are located in a developed area in the City. However, it is unknown whether or not any of the properties on which the related projects are located contain biological resources, such as sensitive species or protected trees. Nonetheless, as there are no biological resources on the Project Site (see analysis above), there is no potential for the Project to contribute to a cumulative impact. Therefore, cumulative impacts to biological resources would be less than significant.

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. Section 15064.5 of the *State CEQA Guidelines* defines an historical resource 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 an historical resource survey meeting certain state guidelines; or

3) an object, building, structure, site, area, place, record or manuscript which 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 significant impact would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The Project Site, which is currently vacant, was formerly occupied by Teledyne company in a total of five buildings, and associated surface parking lots. Demolition permits were issued for the buildings in February 2016, and all of the buildings were removed shortly thereafter.[12] The Project Site does not require historic preservation review and is not within a historic preservation overlay zone;[13] nor is the Project Site identified in the Historic Places LA resource inventory,[14] or as a City Historic-Cultural Monument.[15] Therefore, no impact would occur and no mitigation measures are required.

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

Less-Than-Significant Impact With Mitigation. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Based on the criteria in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within the Project Site. Section 15064.5 of the *State CEQA Guidelines* defines criteria for historical resources or resources that constitute unique archaeological resources. A significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.

The site is not known to have archaeological resources; however, there are recorded archaeological resources adjacent to the Project area and within a ½-mile radius. A map review of Redondo indicated that in 1896, there was little to no visible development within the Project Site; however, there were two roads and three buildings within the vicinity of the Project area. The Atchison Topeka and Santa Fe Railroad (Santa Monica Branch) ran to the south of the Project Site. Ballona Creek was located to the southeast of the Project Site and Ballona Lagoon with freshwater marshes was present to the southwest of the Project Site. The Project Site was located within the historic place name of La Ballona. In 1944, there appeared to be one building within the Project Site. There were numerous roads and buildings within the vicinity of the Project area with the Project Site being located within an urban environment. The railroad is currently present to the south of the Project Site and a second unnamed railroad also runs to the east of the Project Site. Ballona Creek appears to have been channelized but still runs to the southeast of the Project Site.[16] Overall, the area is substantially developed and has had past grading soil disturbance activities. Any archaeological resources that may have existed near the Project Site's surface would have likely been disturbed or previously removed. However, the Project would likely result in deeper excavations than previously performed on the site. As such, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during excavation activities. If previously unknown archaeological resources are found during excavation, the Project would be required to follow procedures detailed in California Public Resources Code Section 21083.2.

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[12] *City of Los Angeles Department of Building and Safety, Permit Nos. 16019-40000-00654, 16019-40000-00655, 16019-40000-00656, and 16019-40000-00657.*

[13] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: December 7, 2015.*

[14] *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, website: http://www.historicplacesla.org/map, accessed: December 7, 2015.*

[15] *City of Los Angeles Department of City Planning, LA Historic-Cultural Monuments, May 2015, website: http://planning.lacity.org/mapgallery/Image/Citywide/LA_HCM.pdf, accessed: December 24, 2015.*

[16] *Written correspondence from Stacy St. James, South Central Coastal Information Center, California State University, Fullerton, March 2, 2016 (See Appendix D to this Initial Study).*

Nonetheless, a potential impact could occur to previously unknown Native American resources during ground-disturbing construction activities, and Mitigation Measure 5-1 is recommended to reduce this impact to a less-than-significant level.

Mitigation Measure

In order to reduce the impacts with respect to the discovery of previously unknown Native American resources during construction of the Project, the following mitigation measure (MM) is recommended:

MM 5-1 Prior to issuance of a grading permit, evidence shall be provided for placement in the Project file that a certified Native American monitor has been retained. During ground-disturbing grading or excavating construction activities, a certified Native American monitor of Gabrieleno descent shall observe and monitor sub-surface activities.

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

Less-Than-Significant Impact. A significant impact could occur if grading or excavation activities associated with a project would disturb paleontological resources or unique geologic features which presently exist within a project site.

The National Historic Preservation Act established the National Register of Historic Places (National Register) to recognize resources associated with the country's history and heritage. Criteria for listing on the National Register are significance in American history, architecture, archaeology, engineering, and culture as present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and that are either: (a) associated with events that have made a significant contribution to the broad patterns of our history; (b) associated with the lives of persons significant in our past; (c) embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or (d) have yielded, or may be likely to yield, information important to history.[17] Criterion (d) is usually reserved for either archaeological or paleontological resources.

The Conservation Element of the City of Los Angeles General Plan addresses paleontological resources in Section 3 of Chapter 2. The Conservation Element's paleontological objective is to "protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes." Moreover, its policy is to "continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities."

The Project Site is relatively flat, and does not contain any unique geological features. There are no known paleontological resources within the Project Site.[18] The Project Site and surroundings are within

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[17] *36 Code of Federal Regulations, Part 60.4.*

[18] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles.*

an area identified as having surface sediments with unknown fossils potential.[19] The entire Project area has surface deposits that consist of younger Quaternary Alluvium, derived predominately as fluvial deposits from Ballona Creek that currently flows just to the east and south. These deposits typically do not contain significant fossil vertebrate remains, at least in the uppermost layers, and there are no known vertebrate fossil localities nearby from such deposits. At relatively shallow depth in this area, however, older Quaternary sediments that contain significant vertebrate fossils are likely to be encountered. The closest vertebrate fossil locality from these deposits are north-northwest of the Project area near the intersection of Rose Avenue and Penmar Avenue, that produced fossil specimens of horse, Equus, and ground sloth, Paramylodon, at greater than eleven feet in depth. The next closest vertebrate fossil locality from these deposits is further north-northwest of the Project area just south of Olympic Boulevard along Michigan Avenue east of Cloverfield Boulevard, which produced a fossil specimen of extinct lion, Felis atrox, at a depth of only six feet below grade.[20]

Although the Project Site has been previously disturbed and developed since the 1920s, and no paleontological resources have been identified on site or in the vicinity, the Project would require additional ground disturbance that may involve deeper excavation than previously performed at the site into native soils that may contain paleontological resources. If previously unknown paleontological resources are inadvertently found during excavation, the Project would be required to follow procedures as detailed in the California Public Resources Code Sections 5097.5 and 30244. Therefore, through compliance with existing State regulations related to paleontological resources, impacts to unknown paleontological resources that could be inadvertently discovered at the Project Site would be less than significant, and no mitigation measures are required.

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

Less-Than-Significant Impact. A significant adverse impact would occur if grading or excavation activities associated with a project were to disturb previously interred human remains.

There are no known human remains within the Project Site. However, previously unknown human remains may exist beneath the Project Site that could be encountered during Project excavation and grading activities. While no formal cemeteries, other places of human internment, or burial grounds sites are known to occur within the immediate Project Site area, there is always a possibility that human remains could be encountered during construction. If previously unknown human remains are found during excavation, the Project would follow procedures as detailed in the California Health and Safety Code Section 7050.5. If human remains of Native American origin are discovered during Project construction, the Project would comply with State laws, which fall within the jurisdiction of the Native American Heritage Commission (Public Resources Code Section 5097), relating to the disposition of Native American burials. Therefore, through compliance with existing State regulations related to human remains, impacts to unknown human remains that could be inadvertently discovered at the Project Site would be less than significant, and no mitigation measures are required.

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[19] *Written correspondence from Samuel A. McLeod, PhD., Natural History Museum of Los Angeles County, March 3, 2016 (See Appendix D to this Initial Study).*

[20] *Written correspondence from Samuel A. McLeod, PhD., Natural History Museum of Los Angeles County, March 3, 2016 (See Appendix D to this Initial Study).*

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6, [Related Projects]) with respect to the topics listed in the cultural resources analysis above, including historic, archaeological, and paleontological resources, and human remains. The cumulative impacts cultural resources study area is the extent of the related projects.

As discussed above, with compliance with State regulatory requirements and Mitigation Measure 5-1, the Project would not result in a significant impact to cultural resources. The Project Site does not contain any known cultural resources. It is unknown whether or not any of the properties on which the related projects are located contain cultural resources. Any related project sites that contain historical, archaeological, or paleontological resources, or human remains would be required to comply with State regulations similar to those that would be required for the Project. Nonetheless, as there are no known cultural resources on the Project Site (see analysis above), there is no potential for the Project to contribute to a cumulative impact. Therefore, cumulative impacts to cultural resources would be less than significant.

6. GEOLOGY AND SOILS

The following section summarizes and incorporates by reference the information provided in the *Preliminary Geotechnical Due-Diligence Investigation for Proposal Commercial Development, 12964, 12950, 12930, 12922, 12918, 12910, and 12908 Panama Street, City of Los Angeles, California, March 31, 2016* (Geotechnical Investigation), which is provided as Appendix E to this Initial Study.

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? Refer to Division of Mines and Geology Special Publication 42.

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project site is located within a State-designated Alquist-Priolo Fault Zone or other designated fault zone, and appropriate building practices are not employed.

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture to built structures. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. Surface rupture of a fault generally occurs within 50 feet of an active fault line. No known active faults traverse the Project Site, nor is the Project Site located within an Alquist-Priolo Fault Zone.[21] According to Geotechnical Investigation, the nearest active fault is

[21] *Preliminary Geotechnical Investigation for Proposal Commercial Development, 12964, 12950, 12930, 12922, 12918, 12910, and 12908 Panama Street, City of Los Angeles, California, prepared by Albus-Keefe & Associates, Inc., March 31, 2016 (See Appendix E to this Initial Study).*

the Newport-Inglewood Fault, located approximately 3.71 miles from the Project Site.[22] Thus, the Project Site would not be subject to the rupture of a known earthquake fault. Therefore, no impact would occur and no mitigation measures are required.

(ii) Strong seismic ground shaking?

Less-Than-Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this analysis, a significant impact may occur if a project represents 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 locations in the Southern California region.

The Project Site is within the seismically active Southern California region and is, therefore, susceptible to ground shaking during a seismic event. The nearest fault to the Project Site is the Newport-Inglewood fault, located approximately 3.71 miles from the Project Site.[23] The Project would comply with the City Building Code and the California Building Code seismic standards appropriate to the Project Site area, as well as the determinations of the Project structural engineer. Thus, through compliance with existing applicable building codes and structural engineering determinations related to seismic standards and design, ground-shaking hazards at the Project Site would not be greater than the average risk in the Southern California region. Therefore, impacts would be less than significant and no mitigation measures are required.

(iii) Seismic-related ground failure, including liquefaction?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and design measures required within such designated areas are not incorporated into the project.

The Project Site is located within a State-designated "Seismic Hazard Zone" for liquefaction potential.[24] Liquefaction is a process whereby strong seismic shaking causes unconsolidated, water-saturated sediment to temporarily lose strength and behave as a fluid. The possibility of liquefaction occurring at a given site is dependent on several factors, including:

- anticipated intensity and duration of ground shaking;
- the origin, texture, and composition of shallow sediments (in general, cohesionless, fine-grained sediments such as silts or silty sands, or areas of uncompacted or poorly compacted fills are more prone to liquefaction); and

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22 *Ibid.*

23 *Ibid.*

24 *Ibid.*

- the presence of shallow groundwater.

Accordingly, an engineering analysis was performed to evaluate the potential for liquefaction at the Project Site if a design earthquake event were to occur. Based on the analysis, several layers between the depths of five and 39 feet have factors of safety below 1.3 and, as such, are prone to liquefaction during a design earthquake event.[25] The Project would be required by mitigation measure MM 6-1 to incorporate all of the Project-specific recommendations, including well-reinforced foundations, such as post-tensioned slabs, grade beams with structural slabs, or mat foundations, which are contained in the Geotechnical Investigation in order to reduce hazards to people and structures arising from liquefaction and other seismic-related ground failure. Moreover, as an infiltration system would likely saturate soils that are subject to liquefaction, the City of Los Angeles Department of Building and Safety (LADBS) does not allow infiltration in a liquefaction area and, therefore, infiltration of surface and stormwater into the ground at the Project Site would not be allowed. Additionally, the Geotechnical Investigation concluded that the Project Site is suitable for the Project.[26] Furthermore, existing State and City building codes and grading plan check procedures require the preparation and submittal of site-specific grading plans and geotechnical reports for review and approval by LADBS prior to permitting construction. Therefore, with compliance with applicable regulations and mitigation measure MM 6-1, impacts would be less than significant.

Mitigation Measure

MM 6-1 Prior to the issuance of the grading permit, the Project design consultant shall demonstrate the incorporation of the recommendations set forth in the Geotechnical Investigation prepared by the geotechnical consultant for the Project, subject to the review and approval of the City of Los Angeles Department of Building and Safety.

(iv) Landslides?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

The Project Site is not located within an area identified as having a potential for landslides,[27] and the Project Site and surrounding area are relatively flat. Additionally, the Project Site is within a developed area of the City and there are no known landslides nearby, nor is the site in the path of any known or potential landslides. Therefore, no impact would occur and no mitigation measures are required.

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[25] *Ibid.*

[26] *Ibid.*

[27] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996, Exhibit C: Landslide Inventory & Hillside Areas in the City of Los Angeles.*

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

Less-Than-Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Project grading, excavation, and construction would expose soil on the site, for a limited time, resulting in possible erosion during the initial stages of construction. Although there is a potential to expose soil to erosion, this potential would be reduced through implementation of stringent controls imposed by grading and building regulations.

The potential for soil erosion during operation of the Project is low due to the fact that the Project Site would be almost entirely paved and/or landscaped. All grading activities would require permits from LADBS, which would include requirements to limit the potential impacts associated with erosion. In addition, on-site grading and site preparation must comply with all applicable provisions in Chapter IX, Division 70 of the LAMC, which addresses grading, excavation, and fills. With implementation of the applicable grading and building requirements as well as best management practices, impacts associated with soil erosion would be less than significant. No mitigation measures are required.

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?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for proposed buildings, thus posing a hazard to life and property. Potential impacts associated with seismic ground shaking, liquefaction, and landslides are evaluated in Questions 6(a)(i) through (iv), above.

Safe construction practices would be exercised through compliance with the State and City building codes requirements, which includes building foundation requirements appropriate to site conditions, as well as through the Project incorporating the recommendations of the geotechnical consultant in the Geotechnical Investigation as required by mitigation measure MM 6-1. Aside from the Project Site being located within a liquefaction area, the Project would not be located on a geologic unit that is unstable, or that would become unstable as a result of the Project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Thus, safe construction would be assured through compliance with the City Building Code and implementation of the aforementioned mitigation measure. Therefore, impacts related to soil stability would be less than significant with implementation of mitigation measure MM 6-1.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less-Than-Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property.

The Geotechnical Investigation indicates that soil materials encountered at the Project Site consist of Quaternary alluvium. The alluvium typically consists of alternating sequences of fine-grained soils comprised of clays, clayey sands, sandy clays, silty sands, sand with some silt, and gravelly sands to 40 feet below the ground surface. These materials were typically damp to wet and loose to very dense. Below 40 feet, fine- to course-grained soils were encountered within the borings and consisted of sandy silts, sands, and gravely sands, which were typically wet and dense to very dense.

As part of the Project's Geotechnical Investigation, expansion tests were performed on the near-surface soils, which yielded a test result indicated that the soils are generally anticipated to possess a Medium expansion potential. As such, design of foundations and flatwork would require design considerations.[28] Nonetheless, safe construction practices would be exercised through compliance with the State and City building codes requirements, which include building foundation requirements appropriate to site conditions, as well as through the Project incorporating the recommendations in the Geotechnical Investigation. Therefore, the impact would be less than significant and no mitigation measures are required.

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. Although not specified in the *L.A. CEQA Thresholds Guide*, this question would apply to a project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area, which is served by an existing wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed by the Project. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the geology and soils analysis above, including seismicity, landslides, loss of topsoil, soil stability, fault rupture, etc. Geological hazards are site-specific and there is little, if any, cumulative relationship between a project and other nearby projects. Nonetheless, cumulative development in the Project vicinity would increase the overall population in the area, thus, increasing the risk of exposure to seismically induced hazards. With adherence to applicable local, State, and federal regulations, building codes, and comprehensive engineering practices, geologic hazards would be less than significant. Furthermore, the analysis of the Project's geology and soils impacts (see analysis above) concluded that, with the implementation of the recommended mitigation measure and compliance with existing State and City building codes and City grading plan check requirements, impacts would be less than significant. Therefore, cumulative impacts would be less than significant.

7. GREENHOUSE GAS EMISSIONS

The following section summarizes and incorporates by reference the information provided in the *Greenhouse Gas Impact Analysis for the Panama/Alla Creative Campus Project,* by Cadence Environmental Consultants, dated April 2016 (Greenhouse Gas Report), which is provided as Appendix F to this Initial Study.

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[28] *Preliminary Geotechnical Investigation for Proposal Commercial Development, 12964, 12950, 12930, 12922, 12918, 12910, and 12908 Panama Street, City of Los Angeles, California, prepared by Albus-Keefe & Associates, Inc., March 31, 2016 (See Appendix E to this Initial Study).*

Background

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most scientific experts agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect a greenhouse has in raising its internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, it is the scientific consensus that emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents ($CO2_e$).

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05 on June 1, 2005, which calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions below 1990 levels by 2050 in California. The Secretary of the California Environmental Protection Agency (CalEPA) was charged with coordination of efforts to meet these targets and formed the Climate Action Team (CAT) to implement the Order.

In March 2006, the CAT published the Climate Action Team Report to Governor Schwarzenegger and the Legislature (the 2006 CAT Report). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. As a central requirement of AB 32, the ARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 GHG emissions limit. This Scoping Plan, which was developed by the ARB in coordination with the CAT, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs;

implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the State; and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan also proposed full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. The Scoping Plan was approved by the ARB on December 11, 2008. According to the September 23, 2010 AB 32 Climate Change Scoping Plan Progress Report, 40 percent of the reductions identified in the Scoping Plan have been secured through ARB actions and California is on track to its 2020 goal.[29]

In April 2015, Governor Brown signed Executive Order B-30-15 which establishes a new interim target to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. This interim target is established to ensure that the state meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. Five key goals for reducing GHG emissions through 2030 include: increasing renewable electricity to 50 percent; 2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; 3) reducing petroleum use in cars and trucks by up to 50 percent; 4) reducing emissions of short-lived climate pollutants; and 5) managing farms, rangelands, forests and wetlands to increasingly store carbon.

While California has a high amount of total GHG emissions, it has low emissions per capita. California ranks fourth lowest of the 50 states in carbon dioxide emissions per capita. The major source of GHG in California is transportation, contributing approximately 37 percent of the state's total GHG emissions. Industrial sources are the second largest generator, contributing approximately 23 percent of the state's GHG emissions. Residential sources contribute only about seven percent of the state's GHG emissions. This is less than the eight percent generated by agriculture.

The City of Los Angeles has begun to address the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan). This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City of Los Angeles is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

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

Less-Than-Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds or a project is inconsistent with local and State-wide goals and policies aimed at reducing the generation of GHG emissions.

[29] *California Air Resources Board, 2010.*

CEQA defines a "significant effect on the environment" as a substantial, or potentially substantial, adverse change in the environment.[30] With respect to global climate change, no one project can individually create a direct impact on what is a global problem (i.e., no project will, by itself, raise the temperature of the planet).

However, the emissions generated by a project may be "cumulatively considerable," meaning "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[31] The CEQA Guidelines add that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.[32]

Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance."[33] Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."[34] For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact.

The City of Los Angeles relies upon the expert guidance of the South Coast Air Quality Management District (SCAQMD) regarding the methodology and thresholds of significance for the evaluation of air quality impacts within the South Coast Air Basin. GHG emissions are air pollutants that are subject to local control by the SCAQMD. As such, the City looks to the SCAQMD for guidance in the evaluation of GHG impacts.

The SCAQMD has been evaluating GHG significance thresholds since April 2008. In December 2008, the SCAQMD adopted an interim 10,000 $MTCO_2e$ per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The SCAQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

Tier 1 Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2 Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

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30 *Public Resources Code Section 21068.*

31 *CEQA Guidelines Section 15065(a)(3).*

32 *CEQA Guidelines Section 15064(h)(3).*

33 *CEQA Guidelines Section 15064.7.*

34 *CEQA Guidelines Section 15064.7(c).*

Tier 3 Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 $MTCO_2e$/year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 $MTCO_2e$/year), commercial projects (1,400 $MTCO_2e$/year), and mixed-use projects (3,000 $MTCO_2e$/year). Under option 2 a single numerical screening threshold of 3,000 $MTCO_2e$/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 $MTCO_2e$ per service population for project level analyses and 6.6 $MTCO_2e$ per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain.

However, for the purpose of evaluating the GHG impacts associated with the Project, this analysis utilizes the SCAQMD's draft tiered thresholds. The SCAQMD's draft thresholds have also been utilized for other projects in the City of Los Angeles.

Tier 1

The Project is subject to CEQA, but no categorical exemptions are applicable to the Project. Therefore, the analysis moves to Tier 2.

Tier 2

The Project would be required to comply with the City of Los Angeles Green Building Program Ordinance, which would reduce the GHG emissions that would be associated with operation of the proposed new building. However, neither the SCAQMD nor the City of Los Angeles have adopted a GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. Therefore, the analysis moves to Tier 3.

Tier 3

The estimated annual construction-related and operational GHG emissions associated with the Project have been calculated utilizing the California Emissions Estimator Model (CalEEMod v. 2013.2.2) recommended by the SCAQMD. These emissions are shown in Table IV-6, Estimated Project Annual GHG Emissions. As shown, the annual emissions would exceed the draft 3,000 $MTCO_2e$ threshold for non-industrial projects. Therefore, the analysis moves to Tier 4.

Tier 4

The SCAQMD's draft thresholds defines the service population as the total residents and employees associated with a project. This may be appropriate for regional or community-wide analyses in which most people are either residents or employees and the two cross over (residents of the community are also employees in the community). In the case of a general development projects, the service population consists of residents, employees, customers, vendors, students, etc. In the case of an office project, employees may be only half of the number of people that visit a site. A good portion of people visiting an office project are customers with a smaller number of vendors (delivery and sales). It does not make sense to consider only the employees as the service population for a project such as this. The employees are at a site to serve the needs of their customers. However, in order to perform a conservative analysis, this report only considers the employees of the proposed new building as the service population for the Project.

The Project is expected to generate approximately 742 jobs based upon a generation rate of 4.79 employees per 1,000 square feet of office use.[35] Dividing the 3.396.96 $MTCO_2e$ annual GHG emissions by 742 employees yields an efficiency of 4.79 $MTCO_2e$ of GHGs per employee. If one considers that the total emissions for the Project also includes the emissions that would be associated with visitors and vendors to the Project Site, the actual emissions per service population would be lower. However, the analysis demonstrates that the GHG emissions per employee would not exceed the SCAQMD's draft threshold of 4.8 $MTCO_2e$ per service population. Therefore the City of Los Angeles, as lead agency, may conclude that the GHG emissions generated in association with the Project would not have a significant impact on the environment.

Table IV-6
Estimated Project Annual GHG Emissions

Emissions Source Category	CO_2e in Metric Tons per Year
Construction	36.21
Operation	
Area Sources	0.02
Energy Sources	1,585.76
Mobile Sources	1,705.25
Waste Disposal	32.79
Water & Wastewater	36.92
Total Emissions	**3,396.96**
SCAQMD Draft Tier 3 Threshold	*3,000.00*
Exceeds Threshold?	**Yes**

Notes: Construction emissions are amortized over 30 years in accordance with SCAQMD guidance (1,086.38 MTCO2e/30 years). The operational emissions shown in this table are the mitigated overall operational emissions totals shown on page 6 of the CalEEMod results sheets in Appendix A of the GHG Report (Appendix F of this Initial Study). This accounts for green building features proposed for the Project. Building energy efficiency, water use reduction, and solid waste diversion in CalEEMod is only allowed to be entered as mitigation even though it is proposed for the Project or required by the City of Los Angeles Green

[35] *Los Angeles Unified School District, 2014.*

Table IV-6
Estimated Project Annual GHG Emissions

Emissions Source Category	CO_2e in Metric Tons per Year
Building Code. No project-specific mitigation measures are identified for this Project. *Calculation data sheets are provided in Appendix A of the GHG Report (Appendix F of this Initial Study).* *Source: Cadence Environmental Consultants, 2016.*	

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

Less-Than-Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The 2006 CAT Report and the ARB's Scoping Plan were developed to direct the state to reduce GHG emissions to 1990 levels. The strategies from the 2006 CAT Report and measures from the ARB's Scoping Plan are applicable to state, regional, and local agencies in the development of plans to reduce GHG emissions, but are not applicable to each and every new general development project. The general intent of these plans, however is to reduce statewide GHG emissions to 1990 levels by 2020.

Strategies and measures have been also been implemented on the state level by example of the new Title 24 California Green Building Standards (CALGreen) Code and on the local level by the City of Los Angeles Green Building Ordinance.

Although not originally intended to reduce greenhouse gases, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2013 Title 24 standards (effective as of January 1, 2014 and supplemented as of July 1, 2015) were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2014 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the CALGreen Code (CCR, Title 24, Part 11).

The City of Los Angeles has adopted portions of the current CALGreen standards (with amendments) in its Green Building Code (Ordinance No. 182849). The Los Angeles Green Building Code applies to the following types of projects:

- All new buildings (residential and non-residential);
- All additions (residential and non-residential);
- Alterations with building valuations of $200,000 or more (residential and non-residential); and
- Residential alterations that increase the buildings conditioned volume.

Mandatory measures that would be applicable to the Project and that would help to reduce potential GHG emissions include the following:

- 99.05.106.5.3. Electric Vehicle (EV) Charging. Provide infrastructure to facilitate future installation of electric vehicle supply equipment (EVSE). EVSE and all devices related to EV charging shall be installed in compliance with the California Building Code Section 406.9, the California Electrical Code Article 625, and as follows:
    - 99,05,106.5.3.1. Charging Locations. Parking facilities shall have five (5) percent of the total parking spaces, but not less than one (1), capable of supporting future EVSE charging locations.
- 99.05.211.1. Solar Ready Buildings. Comply with Section 110.10 of the California Energy Code.
- 99.05.303.3.2. Urinals. The effective flush volume of urinals shall not exceed 0.125 gallons per flush.
- 99.05.303.4. Wastewater Reduction [N]. Each building shall reduce by 20% wastewater by one of the following methods:
    1. The installation of water-conserving fixtures (water closets, urinals) meeting the criteria established in Section 5.303.2 or 5.303.3.
    2. Utilizing nonpotable water systems [captured rainwater, graywater, and municipally treated wastewater (recycled water) complying with the current edition of the Los Angeles Plumbing Code or other methods described in Section A5.304.8].
- 99.05.304.2. Outdoor Potable Water Use. For new water service or for addition or alteration requiring upgraded water service for landscaped areas of at least 1,000 square, separate submeters or metering devices shall be installed for outdoor potable water use.
- 99.05.304.3. Irrigation Design. In new nonresidential construction or building addition or alteration with at least 1,000 square feet of cumulative landscaped area, install irrigation controllers and sensors which include the following criteria, and meet manufacturer's recommendations.
    1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change.
    2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor which connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input.
- 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics and metals or meet a lawfully enacted local recycling ordinance, if more restrictive.

The Project would be subject to the mandatory measures of the Los Angeles Green Building Code. Based on this information, the Project would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGs. The impact of the Project would be less than significant. Nonetheless, a mitigation measure is recommended to further the City's efforts to reduce GHG emissions citywide.

Mitigation Measure

In order to further the City's efforts to reduce GHG emissions citywide, the following mitigation measure (MM) is recommended:

MM 7-1 Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable.

To encourage carpooling and the use of electric vehicles by Project occupants and visitors, at least 20 percent of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate that the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Cumulative Impacts

As discussed above, emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change; the consequences of which may result in adverse environmental effects. The state has mandated a goal of reducing state-wide emissions to 1990 levels by 2020, even though state-wide population and commerce is expected to grow substantially. As discussed above, the annual GHG emissions associated with the Project would not exceed the SCAQMD's draft thresholds of significance for mixed-use projects. The Project would also not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGs. For these reasons, the contribution of the Project to the cumulative effect of global climate change is not considered to be cumulatively considerable.

8. HAZARDS AND HAZARDOUS MATERIALS

The following section summarizes and incorporates by reference the information provided in the *Phase I Environmental Site Assessment, Teledyne Electronic Technologies, 12964, 12950, 12930, 12922, 12918, 12910, and 12908 Panama Street, Los Angeles, CA,* by Environ, dated January 2013 (Phase I), and the *Remedial Action Plan (RAP) for Soils Panama Street Site, 12922 Panama Street, Los Angeles, CA 90066*, by Alta Environmental, dated January 28, 2016 (RAP), which are provided as Appendix G and Appendix H, respectively, to this Initial Study.

According to the *L.A. CEQA Thresholds Guide*, the determination of significance with respect to hazards and hazardous materials shall be made on a case-by-case basis considering the following factors:

- The regulatory framework for the health hazard;

- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences;
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

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 may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include the adjacent nearby residential neighborhood to the north and west. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in other commercial/office developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced through compliance with these existing standards and regulations. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. A less-than-significant impact would occur and no mitigation measures are required.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less-Than-Significant Impact. A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. The Project Site was previously developed with three adjoining buildings located on the northwestern portion of the site, two adjoining buildings located on the northeastern portion of the site, and two freestanding buildings located on the central and southeastern portions of the site. These one-story buildings contained approximately 109,100 square feet of space. Other smaller structures on the Project Site included a covered contained area for the storage of hazardous waste, a chemical storage shed, and three sheds for the storage of water tanks, below-grade sumps, and electric air compressors. These buildings have since been removed as part of a remediation process that is outside the scope of the Project. All remediation would occur prior to the development of the Project, which is

comprised of a 155,000-square-foot creative office campus with a separate above-grade parking structure, and to the satisfaction of the regulatory agency.

Recognized Environmental Conditions

While the Project Site is currently a vacant dirt lot surrounded by fencing, the Project Site had been previously developed with a hybrid microcircuit manufacturing facility. A *Phase I Environmental Site Assessment (ESA)* of the Teledyne facility was prepared in January 2013 in order to identify recognized environmental conditions (REC) in connection with the Project Site and hybrid microcircuit manufacturing facility.[36] An REC is the presence or likely presence or any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

No known or suspect RECs, historical RECs, controlled RECs, or *de minimus* conditions were identified in the Phase I ESA, except for the following:[37]

- Former Release of Trichloroethylene (TCE). Based on review of the Los Angeles County Public Health Investigator (PHI) records, a 55-gallon drum containing TCE was ruptured in April 1985 at the 12964 Panama Street address. No information was given about the amount of TCE was spilled and no specifics were provided in the record regarding the exact location of spill. Reportedly, pertaining to the incident, "the spill of TCE was diked, absorbed, and picked up." An approximately 10 foot by 15 foot area of staining on the asphalt was observed by PHI following the incident. No further information was provided in the PHI records.

It should be noted that a *Remedial Action Plan (RAP)* was prepared on January 28, 2016 (RAP). According to Teledyne personnel, there is no record of Teledyne having used TCE at the Site during April 1985, and the records cited in the Phase I likely incorrectly characterized the spill. Investigation of the use of TCE by the property owner or other tenants is ongoing. Furthermore, the remediation activities for the Project Site would be performed in accordance with applicable state and federal occupational and health safety standards as set forth in 29 CFR 1910 and 1926, California Health and Safety Regulations as set forth in Title 8 CCR and guidance established by the DTSC and USEPA.

Volatile Organic Compounds

Volatile Organic Compounds (VOCs) (TCE, 1,1-DCE, and PCE) have been identified as COCs at the Project Site. Personal protection and sanitation includes preventing skin and eye contact and flushing immediately if contact occurs. Exposure routes include inhalation, skin absorption, ingestion, skin and eye contact. Symptoms of exposure may include irritation in the eyes, skin, nose or respiratory system; giddiness; headache; nausea; staggered gait; fatigue; dermatitis; bone marrow depressant/depression. TCE, 1,1-DCE, and PCE are potential occupational carcinogens.

Because the excavated soils contain VOCs that may potentially off-gas, excavation would be subject to SCAQMD Rule 1166 for the excavation of VOC-impacted soils. Measures would be taken in accordance with permit requirements during excavation, screening, stockpiling, loading, and transporting.

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[36] *Phase I Environmental Site Assessment, Teledyne Electronic Technologies, 12964, 12950, 12930, 12922, 12918, 12910, and 12908 Panama Street, Los Angeles, CA, by Environ, dated January 2013 (See Appendix G to this Initial Study).*

[37] *Ibid.*

Excavated soils and any other remediation waste would be properly managed in accordance with Resource Conservation and Recovery Act (RCRA) and DTSC guidelines and transported offsite by a licensed hazardous waste transportation contractor with appropriate hazardous waste manifest, in accordance with DOT guidelines. Based on the laboratory analytical results of soil samples summarized in the RAP, the waste has been profiled as a non-hazardous waste. Excavated soil would be transported to the Chiquita Canyon Landfill, 29201 Henry Mayo Drive, Castaic, California 91384.

Methane

Methane (CH_4) is a naturally occurring, odorless, colorless, and extremely flammable gas with a wide distribution in nature. It is the major constituent of natural gas that is used as a fuel, and is an important source of hydrogen and a wide variety of other organic compounds. It is often found in conjunction with petroleum deposits. No long-term health effects are known to occur from exposure to methane. However, at very high concentration, methane can act as an asphyxiate by reducing the relative concentration of oxygen in the air that is inhaled (similar to carbon monoxide). The primary danger posed by methane build-up is the risk of fire or explosion.

Methane in the atmosphere has both natural and anthropogenic (i.e., caused by humans) sources. Its atmospheric concentration is less than carbon dioxide (CO_2) and its lifetime in the atmosphere is brief (10-12 years) when compared to other gases. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning.

Methane has the potential to migrate into buildings through physical pathways that include cracks in concrete foundations, unsealed conduits or utility trenches, and other small openings common in building construction. Methane gas can also reach the surface through natural geologic features which may facilitate vertical, lateral or oblique migrations.

Worker exposure to methane is regulated by the federal Occupational Safety and Health Administration (OSHA) under CFR section 1910.146. This section regulates worker exposure to a 'hazardous atmosphere' within a confined space where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit.

Chapter IX, Article 1, Division 71, Section 91.7103 of the *Los Angeles Municipal Code* (LAMC), also known as the Los Angeles Methane Seepage Regulations, identifies Methane Hazard Zones and Methane Buffer Zones. The Project Site is adjacent to the Playa Del Rey Oil Field and is therefore designated within a Methane Zone, as designated by Los Angeles Department of Building and Safety (LADBS).[38] The Playa Del Rey Oil Field is currently utilized for natural gas storage by the Southern California Gas Company (SCG). There are three types of gas that exist within the Playa Del Rey Oil Field, processed natural gas (or piped gas), biogenic (or swamp) gas, and thermogenic (field) gas. The biogenic gas is comprised primarily of methane. Due to the potential environmental risk associated with Methane Hazard Zones, properties within a Methane Hazard Zone require methane testing and mitigation upon development.

Therefore, as the Project Site is within a methane zone, prior to the issuance of a building permit, the Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and

[38] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: April 12, 2016.*

Section 91.7102 of the LAMC, hired by the Project Applicant. Based on the results of the soil-gas testing and pursuant to the requirements of the methane regulations, the methane mitigation system may require, but not be limited to, a barrier (i.e., a membrane shield) between the building and underlying earth, installing a vent system(s) beneath the barrier and/or within the building, and installing a gas (methane) detection system. Design of the methane mitigation system would be confirmed and approved by LADBS prior to the issuance of building permits for the Project.

In addition, MM 8-1 recommends that a contingency should be provided for handling and potential offsite disposal of natural petroleum impacted soils should they be encountered during future site construction activities.

Mitigation Measure

MM 8-1 If any visual or olfactory indication of potentially contaminated soil, groundwater and/or toxic materials is encountered during excavation, grading or foundation construction activities, activities shall be temporarily halted. The City of Los Angeles and other appropriate agencies shall be contacted for consultation on the appropriate level of mitigation of the contamination (e.g., excavation and disposal, or treatment in-situ (in-place)) to be implemented so as so render the site suitable for construction activities to resume.

With the implementation of MM 8-1, potential construction and operational impacts from methane gas and petroleum impacted soil would be reduced to a less than significant level.

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- A project involved the creation of any health hazard or potential health hazard.

One school is located approximately one quarter-mile from the Project Site. Ocean Charter School is located at 12606 Culver Boulevard, approximately 0.27 mile northwest of the Project Site. As discussed above in Questions 8(a) and 8(b), the Project would not emit or handle hazardous materials or substances other than typical cleaning solvents used for janitorial purposes during operation. During construction, impacts with regards to hazardous materials would be less than significant. Therefore, the impact from the potential emission and handling of hazardous materials near a school would be less than significant and no mitigation measures are required.

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. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental

Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

A database search was conducted as part of the Phase I ESA performed for the Project Site, to identify potential areas of groundwater and/or soil contamination on-site or in the vicinity of the Project Site. The records search included numerous government databases such as those of registered underground storage tanks (USTs), operators of hazardous waste generators, facilities with NPDES permits, and sites with known hazardous materials release.[39]

However, the Project Site does not, as a result, create a significant hazard to the public or the environment. The Project consists of the remediation of chemical impacts in soils at the Project Site, which would reduce the potential for exposure and hazards to the public. The achievement of remedial goals would be confirmed through sampling and analysis to demonstrate that residual concentrations of chemicals do not pose an unacceptable risk to human health or the environment. BMPs and required design features would ensure that remediation activities do not create a significant hazard to public or the environment. Remedial goals may also be achieved through the use of deed restrictions, institutional controls, and engineering controls.[40]

As discussed above in Question 8(b), the potential for accidental release of hazardous materials into the environment would be less than significant. Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment and a less-than-significant impact would occur. No mitigation measures are required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The nearest airport to the Project Site is the Los Angeles International Airport, located approximately two miles to the south. However, the Project Site is not located within this airport's influence area or land use planning boundary.[41] Therefore, no impact would occur and no mitigation measures are required.

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?

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur and no mitigation measures are required.

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[39] *Remedial Action Plan (RAP) for Soils, Panama Street Site, 12922 Panama Street, Los Angeles, CA 90066, prepared by Alta Environmental, January 28, 2016.*

[40] *Remedial Action Plan (RAP) for Soils, Panama Street Site, 12922 Panama Street, Los Angeles, CA 90066, prepared by Alta Environmental, January 28, 2016.*

[41] *Department of Regional Planning, Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Los Angeles International Airport Influence Area, May 13, 2003.*

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-Than-Significant Impact. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which a project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

Neither Alla Road nor Panama Street are identified as a disaster route by either the City[42] or by Los Angeles County.[43] However, Los Angeles County designated the Marina Freeway as a Primary Disaster Route, and a portion of Culver Boulevard between Centinela Avenue and the I-405 Freeway as a Secondary Disaster Route.[44] Nonetheless, as discussed under Question 16(a), below, the Project would not result in any significant traffic impacts. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LAFD during review of plans as part of the building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and evacuation routes would be maintained during construction. Therefore, impacts would be less than significant and no mitigation measures are required.

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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project site is located in proximity to wildland areas and poses a significant fire hazard, which could affect persons or structures in the areas in the event of a fire.

The Project Site is located in a developed area of the City and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone;[45] nor is the Project Site within a wildland fire hazard area.[46] Therefore, no impact from wildland fires would occur and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impacts of the Project and the eight related projects (see Section II.6, [Related Projects]) with respect to the topics listed in the hazards and hazardous materials analysis above, including the transport of hazardous materials, upset and accident

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[42] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996, Exhibit H: Critical Facilities & Lifeline System in the City of Los Angeles, page 61.*

[43] *Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Valley Area, September 25, 2012.*

[44] *Ibid.*

[45] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: December 7, 2015.*

[46] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996, Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles, page 53.*

conditions, handling of hazardous materials, etc. The cumulative impacts hazardous materials study area is the extent of the related projects.

Development of the Project in combination with the related projects could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. However, the Project's impact would be less than significant and, therefore, would not substantially contribute to a cumulative impact. Furthermore, local municipalities will be required to follow local, State, and federal laws regarding hazardous materials. With compliance with local, State and federal laws pertaining to hazardous materials, cumulative impacts to hazardous materials would be less than significant.

9. HYDROLOGY AND WATER QUALITY

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

Less-Than-Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by SWRCB. These regulations include compliance with the *Standard Urban Storm Water Mitigation Plan* (SUSMP) requirements to reduce potential water quality impacts.

Construction

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction associated with the Project would be subject to the requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB) Order No. R4-2012-0175, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the Los Angeles County MS4 Permit), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires Permittees (which include the City) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.[47] ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State,

[47] *California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116 et seq.*

and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.

Operation

With respect to water quality during operation of the Project, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, which would apply to the Project Site.[48] This Program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the SUSMP adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant. With appropriate Project design and compliance with the applicable federal, State, local regulations, and permit provisions, impacts of the Project related to stormwater runoff quality would be less than significant.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance will require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Project Site.

Since the redeveloped site would result in an alteration of over 50 percent of impervious surfaces of the existing development, the entire site would comply with the LID standards. The mitigated surface runoff

[48] *Ibid., page 97 et seq.*

is based on the first flush volume of the storm water, which is the greater of the 0.75-inch rainfall and the 85th percentile rainfall, 24-hour rain event.[49]

Stormwater from the entire Project Site would be conveyed via underground pipes directly to the pretreatment systems then discharged to treatment systems. The overflow from the treatment areas would be conveyed via underground pipes either to curb drains, storm drain mains, or to the back of public catch basins. However, it should be noted that LADBS does not allow infiltration in a liquefaction area, and therefore, the Project Site is not suitable for infiltration of surface and stormwater into the ground (see Question 6[a][iii], above).[50] Treatment systems currently being considered include capture and reuse, bio-filtration, and bioswales. Pretreatment options include; continuous deflection system (CDS) units and catch basin filter inserts.

One treatment option that has been considered is biofiltration planter boxes. The anticipated, approximate, required planter box surface area for the overall Project is provided in Table IV-7, Summary of BMP Calculations. Another treatment option considered is capture and reuse. The anticipated, approximate, required storage volume and planting area are also provided in Table IV-7, Summary of BMP Calculations.

Table IV-7
Summary of BMP Calculations

BMP Sizing					
Site Properties			Biofiltration Planter	Capture and Reuse	
Drainage Area	Area (AC)	% Imp	Required Biofiltration Planter Surface Area (SF)	Required Capture and Reuse Detention Volume (Gallons)	Required Planting to Irrigate (SF)
DA 1	5.87	90	16,935.02	137,230	275,000

Source: KPFF Consulting Engineer, March 2016.

All BMPs would meet the design criteria in Attachment H of the most current MS4 Permit. Input parameters and calculations for BMP sizing are shown in Appendix A to the LID (found in Appendix I to this Initial Study).

Additionally, because the Project Site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site compared to existing conditions. Therefore, impacts would be less than significant and no mitigation measures are required.

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[49] *Preliminary Low Impact Development (LID) Study, Alla Creative Office Project, 12908 Panama Street, Los Angeles, CA, prepared by KPFF Consulting Engineers, March 18, 2016 (See Appendix I to this Initial Study).*

[50] *Preliminary Geotechnical Investigation for Proposal Commercial Development, 12964, 12950, 12930, 12922, 12918, 12910, and 12908 Panama Street, City of Los Angeles, California, prepared by Albus-Keefe & Associates, Inc., March 31, 2016 (See Appendix E to this Initial Study).*

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to:

- Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought;
- Reduce yields of adjacent wells or well fields (public or private);
- Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity.

According to the Geotechnical Investigation, the historically highest groundwater level is approximately five feet below the ground surface in the Project area. Groundwater was encountered during the field investigation to a depth ranging from 10 to 11 feet below the ground surface in all of the borings. The design recommendations in the Geotechnical Investigation would be incorporated into the Project design to avoid any potential impacts related to groundwater during construction. Nonetheless, the Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table.

Additionally, operation of the Project would not interfere with any groundwater recharge activities within the area. It should be noted that because the Project Site is within a liquefaction area, LADBS does not allow infiltration of surface or stormwater into the ground as infiltration would likely saturate soils already subject to liquefaction (see Question 6[a][iii], above). Thus, due to its location, the Project Site would not contribute to groundwater recharge, albeit such recharge would have been at a comparatively negligible degree. Even so, construction and operation of the Project would not substantially affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant, and no mitigation measures are required.

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Construction

Construction is regulated by the *City Building Code* (Sections 91.7000 through 91.7016 of the LAMC). The City Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work, including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from sedimentation and erosion. Necessary permits, plan checks, and inspections are specified therein. Also included in these requirements is the provision that any grading work in excess of 200 cubic yards that would occur between November 1 and April 15 (the "rainy season") must include an erosion control system approved by LADBS, which would be applicable to the Project. During Project construction, a temporary alteration of the existing on-site drainage pattern may occur. However, these changes would not result in substantial erosion or siltation due to stringent controls imposed via NPDES, ESCP, LID, and SUSMP regulations, as discussed under Question 9(a), above.

Operation

The Project Site is located in a developed area, and no streams or river courses are located on or immediately adjacent to the Project Site (although Ballona Creek and Ballona Wetlands Ecological Reserve are located approximately 1,200 feet and 400 feet from the Project Site, respectively). The Project Site would not increase the amount of impervious surface area on the Project Site compared to the existing conditions.

Runoff associated with the Project would be either directed to landscaped areas for evaporation and/or directed to the existing City storm drain system, and thus, would not encounter exposed soils. With the development of the Project, the drainage pattern would be generally similar to the pattern at the Project Site compared to the existing conditions by conveying runoff to the City storm drain system, and improved with adequate conveyance. Thus, operation of the Project would not result in substantial erosion or siltation on- or off-site, nor would the Project result in the alteration of the course of a stream or river. Therefore, impacts would be less than significant and no mitigation measures are required.

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. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

There are no streams or rivers within the Project Site. Runoff associated with the Project would be either directed to landscaped areas for evaporation and/or directed to the existing City storm drain system and, thus, would not encounter exposed soils. The conveyance of runoff to the City storm drain system would not result in flooding on- of off-site. Therefore, impacts would be less than significant and no mitigation measures are required.

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. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this issue, a significant impact may occur if the volume of stormwater runoff from a project were to increase to a level that exceeds the capacity of the storm drain system serving the project site. A significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

Runoff associated with the Project would be either directed to landscaped areas for evaporation and/or directed to the existing City storm drain system. The Project would be subject to the provisions of the LID Ordinance, as appropriate (i.e., without on-site infiltration design measures incorporated). In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that expand the review of the SUSMP discussed above. Incorporation of these features would minimize the stormwater runoff from the Project Site. Considering these things, it can be reasonably anticipated that the existing storm drain system has adequate capacity to accommodate flows from the Project Site. Therefore, impacts would be less than significant and no mitigation measures are required.

f) Would the project otherwise substantially degrade water quality?

Less-Than-Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project includes sources of water pollutants that would have the potential to substantially degrade water quality. As described in Questions 9(a) and 9(e), with implementation of regulatory requirements, water quality impacts associated with construction and operation of the Project would be less than significant. No mitigation measures are required.

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. Although not specified in the *L.A. CEQA Thresholds Guide*, 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 which results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to the National Flood Insurance Program Flood Insurance Rate Map for the Project area, the Project Site is within unshaded Zone X.[51] Unshaded Zone X areas are areas outside the 0.2 percent annual chance floodplain. Therefore, the Project would not place housing within a 100-year flood hazard area and no impact would occur. No mitigation measures are required.

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[51] *Department of Homeland Security, Federal Emergency Management Agency, National Flood Insurance Program, Flood Insurance Rate Map, Los Angeles County, California and Incorporated Areas, Panel 1760 of 2350, Map Number 06037C1760F, Effective Date September 26, 2008.*

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project was located within a 100-year flood zone, which would impede or redirect flood flows. As discussed in Question 9(g), the Project Site is not located within a 100-Year Flood Plain Area.[52] The Project Site is located in a developed area and would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur and no mitigation measures are required.

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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project exposes people or structures 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 (a surface wave created when a body of water is shaken), which could result in a water storage facility failure. The Project Site is located within a potential dam inundation area in the event that either the Stone Canyon Reservoir or Upper Stone Canyon Reservoir failed.[53]

The Stone Canyon Reservoir and the Upper Stone Canyon Reservoir, which are operated and maintained by the Los Angeles Department of Water and Power, are located south of Mulholland Drive and west of North Beverly Glen Boulevard, and approximately 16 miles north of the Project Site. The reservoirs were built in 1957 and have a capacity of 137 million gallons of water. They supply water to the areas of West Los Angeles, Pacific Palisades, and Marina Del Rey.[54] The reservoirs are utilized for storage of non-potable water that would be used only during extreme emergencies. Thus, as the Stone Canyon Reservoir and Upper Stone Canyon Reservoir do not take on excess water during increased periods of rain and also considering the distance of the Project Site from the Hansen Dam (16 miles), the potential risk of inundation from failure of the Stone Canyon Reservoir or Upper Stone Canyon Reservoir resulting in loss of life, injury, or death at the Project Site is very low.

Furthermore, it should be noted that for purposes of conservatively mapping a dam failure inundation area, the water level contained by each dam is assumed to be the peak storage capacity, and the failure is assumed to be catastrophic (i.e., instantaneous). The greatest hazard is closest to the dam where the flood waters would have the greatest volume (and depth) and velocity which causes direct impact to structures, flooding, and severe erosion. Some property damage and injury could be caused at much greater distances due to collateral considerations (e.g., vehicle accidents, electrical shock). The State Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. Dam safety regulations and flood plain ordinances are the main means of mitigating damage

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[52] *Ibid.*

[53] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996, Exhibit G: Inundation & Tsunami Hazard Areas in the City of Los Angeles, page 59.*

[54] *City of Los Angeles Department of Water and Power, Water, Upper Stone Canyon Reservoir Water Quality Improvement Project, accessed, April 7, 2016.*

or injury due to dam failure inundation; even so, dam failure inundation has a relatively low probability of occurrence.[55]

Considering (1) the relatively small proportional increase in number of residents and workers that would be put at potential risk from dam inundation, (2) the distance of the Project Site from the Stone Canyon Reservoir allowing for adequate forewarning and potential evacuation if necessary, and (3) safety requirements and inspections by the U.S. Army Corps of Engineers and the State Division of Safety of Dams, impacts would be less than significant. No mitigation measures are required.

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

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if a project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The Project Site is located approximately three miles from the Pacific Ocean, and is not within an area potentially impacted by a tsunami.[56] There are also no major water bodies in the vicinity of the Project Site that would put the site at risk of inundation by seiche. The Project Site is relatively flat and is not located adjacent to a hillside area and, thus, the potential for mudflows to impact the Project Site would be highly unlikely. Therefore, no impacts with respect to the risk of loss, injury, or death by seiche, tsunami, or mudflow would occur and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the hydrology and water quality analysis above. The cumulative impacts hydrology and water quality study area is the extent of the related projects as well as the Los Angeles River Watershed.

With respect to construction impacts, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. However, similar to the Project, the related projects would be required to comply with the City Building Code, NPDES requirements, etc. Assuming compliance, similar to the Project, the cumulative water quality impact during construction would be less than significant.

With respect to operational impacts, development of the Project in combination with the related projects would result in the further infilling in an already developed area. As discussed above, the Project Site and the surrounding area are served by the existing City storm drain system. Runoff from the Project Site and the adjacent land uses is typically directed into the adjacent streets, where it flows to the drainage system. It is likely that most, if not all, of the related projects would also drain to the surrounding street system and otherwise retain stormwater on-site.

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[55] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Section 2.17, Geologic/Seismic Conditions, pages 2.17-38, 2.17-40, 2.17-61 – 2.17-62.*

[56] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit G: Inundation & Tsunami Hazard Areas in the City of Los Angeles, page 59.*

The runoff associated with the related projects would either be directed to landscaped areas or directed to an existing storm drain system and would not encounter exposed soils. The related projects would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain. In addition, all of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative hydrology, water quality, and flooding impacts during operation would be less than significant.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project would be sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of a project.

Physically dividing elements may include land use incompatibility caused by contrasting scale or land use. The following analysis outlines the Project's compatibility with existing surrounding land uses in terms of land use function, scale, and intensity.

The Project Site is relatively flat and is surrounded by commercial, light manufacturing, and residential land uses in an urban setting that is similar to other areas in the Del Rey area of the City. The Project Site is surrounded by single-family residences to the west and north, and light manufacturing and office land uses to the north, east, and west. A self-storage facility borders the Project Site to the southeast. The Marina Freeway (SR-90) is located to the south of the Project Site.

The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. As the Project would be developed within a long-established developed area along an existing street system, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street pattern. The Project would not create a conflict of scale, intensity, or use that would serve as a physical division. Since the Project would not physically disrupt or divide the surrounding established community, no impact would occur and no mitigation measures are required.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less-Than-Significant Impact. A significant impact may occur if the project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse

environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

The Project is located in the Palms – Mar Vista – Del Rey community of the City. As such, the Project Site is subject to the applicable policies and zoning requirements of several regional and local plans. At the regional/subregional level, development within the Project Site is subject to the Southern California Association of Governments' (SCAG) *2008 Regional Comprehensive Plan* (RCP), SCAG's *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS), the South Coast Air Quality Management District's (SCAQMD) *2012 Air Quality Management Plan* (AQMP), and the Los Angeles County Metropolitan Transportation Authority's (Metro) *Congestion Management Program for Los Angeles County* (CMP). At the City level, development within the Project Site is subject to the *City of Los Angeles General Plan* (General Plan), the *Palms – Mar Vista – Del Rey Community Plan* (Community Plan), the *Los Angeles Coastal Transportation Corridor Specific Plan*, and the *City of Los Angeles Municipal Code* (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (Planning and Zoning Code). The Project Site is subject to the Department of City Planning's *Walkability Checklist*. An overview of each of these plans and regulations is provided below. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may not be relevant to this environmental impact analysis.

SCAG Plans

The goals and policies in the SCAG plans only address projects considered to be regionally significant. SCAG reviews projects and plans throughout its jurisdiction to monitor regional development. In the Southern California region, SCAG acts as the region's "clearinghouse" and collects information on projects of varying size and scope to provide a central point to monitor regional activity. The Project is not considered to be a regionally significant project. As such, the Project is not required to demonstrate consistency with SCAG policies contained in the RCP, RTP/SCS, or Compass Blueprint Growth Vision Report. Nonetheless, consistency with the SCAG 2008 Regional Comprehensive Plan is provided below.

2008 Regional Comprehensive Plan

The Project would be consistent with to the goals in the RCP, including goals related to land use. The land use goals support the implementation of the Compass Blueprint and 2% Strategy. Table IV-8, Project Consistency with Applicable Regional Comprehensive Plan Goals, presents an analysis of the consistency of the Project with those goals.

Table IV-8
Project Consistency with the Applicable Regional Comprehensive Plan Goals

Goal	Project Consistency
Focusing growth in existing and emerging centers and along major transportation corridors.	**Consistent.** The Project is located along Culver Boulevard and the Marina Freeway, both of which are major transportation corridors.
Targeting growth in housing, employment,	**Consistent.** The Project would be comprised of a creative

Table IV-8
Project Consistency with the Applicable Regional Comprehensive Plan Goals

Goal	Project Consistency
and commercial development within walking distance of existing and planned transit stations.	office campus development that is located adjacent Culver Boulevard and the Marina Freeway, both of which are served by Metro buses. The two nearest bus stops to the Project Site are Culver City Bus Line 7, located at Alla Road and Culver City Bus Line 7, located Culver Boulevard.
Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots.	**Consistent.** The Project would develop a creative office campus development that is currently vacant.
Protecting important open space, environmentally sensitive areas and agricultural lands from development.	**Consistent.** The Project would not remove important open space, environmentally sensitive areas, or agricultural lands.
Source: Southern California Association of Governments, Final 2008 Regional Comprehensive Plan, October 2008; EcoTierra Consulting, 2016.	

Accordingly, the Project would be consistent with the 2008 RCP Goals.

Regional Transportation Plan/Sustainable Communities Strategy

Federal guidelines require that all new regionally significant transportation projects be included in an RTP before they can receive federal or State funds or approvals. Metro submits the program of Los Angeles County projects for inclusion in the Regional Transportation Improvement Program. The RTP must be updated and federally approved every three years. Federal approval requires a positive demonstration that the RTP projects would not generate travel emissions that exceed those assumed in the applicable *Air Quality Management Plan*; this requirement is known as "transportation conformity".

SCAG adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future* (RTP/SCS) on April 7, 2016. The RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region's residents. The RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects. The consistency of the Project with the RTP/SCS is addressed in Table IV-9, Consistency of the Project With Applicable Goals of 2016-2040 RTP/SCS.

Table IV-9
Consistency of the Project With
Applicable Goals of 2016-2040 RTP/SCS

Goal	Project Consistency
Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** Multiple public transportation opportunities are provided adjacent to the Project Site. The MTA local line 108, Big Blue Bus Lines 3 and 14, and the Culver City Bus Lines 1, 4, 5, and 7 are all available near the Project Site. The Project would develop office land uses within walking distance of existing bus lines.
Ensure travel safety and reliability for all people and goods in the region.	**Consistent.** The Project Site is located close to existing public transit opportunities, which provide safe and reliable travel options for people and goods.
Maximize the productivity of our transportation system.	**Consistent.** The Project would be a greater density than what currently exists on the Project Site. Multiple public transportation opportunities are provided near the

Table IV-9
Consistency of the Project With
Applicable Goals of 2016-2040 RTP/SCS

Goal	Project Consistency
	Project Site. The MTA local line 108, Big Blue Bus Lines 3 and 14, and the Culver City Bus Lines 1, 4, 5, and 7 are all available near the Project Site. The Project would provide opportunities for employees and visitors to use public transit for work trips, and walk to other retail businesses near the Project Site.
Protect the environment and health of our residents by improving air quality, and encouraging active transportation (e.g., bicycling and walking).	**Consistent.** The Project would incorporate a wide range of building technologies and design features that would protect the environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality (refer to Section II, Project Description, Green Building Features). The Project would have a pedestrian-friendly design, would be located near public transit opportunities, and would include bicycle parking for long- and short-term uses.
Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent.** The Project is located in an urban area, and would be a greater density than what currently exists on the Project Site. In addition, the Project Site is accessible to the regional bus systems. The Project would concentrate new development and jobs at a location that is served by several Metro bus lines, Big Blue Bus Lines, and Culver City Bus Lines, thus, providing opportunities for employees and visitors to use public transit for work trips, and walk to restaurants within and near the Project Site.

Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016; EcoTierra Consulting, 2016.

Therefore, the Project would be consistent with the applicable goals in the RTP/SCS.

South Coast Air Quality Management District

The Project Site is located within the South Coast Air Basin (Basin) and is, therefore, within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the SCAQMD on December 7, 2012. This AQMP, referred to as the 2012 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2012 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin. Air quality impacts of the Project and consistency of the Project with the AQMP are analyzed in greater detail under Question 3(a).

County of Los Angeles

Congestion Management Program

Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating regional transportation policies. The *Congestion Management Program* (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects, which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements), cities, counties, and other eligible agencies must implement the requirements of the CMP. Metro is the designated congestion management agency responsible for coordinating the County's adopted CMP. The Project's traffic analysis, which is presented in greater detail under Question 16(a), was prepared in accordance with the County of Los Angeles CMP and City of Los Angeles Department of Transportation (LADOT) guidelines.

City of Los Angeles

City of Los Angeles General Plan

Land uses on the Project Site are guided by the *City of Los Angeles General Plan* (General Plan). The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation. The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses citywide policies, and also includes the 35 community plans that guide land use at a local level.

City of Los Angeles General Plan Framework Element

The consistency of the Project with applicable objectives and policies in the City of Los Angeles General Plan Framework Element is presented in Table IV-10, Consistency of with the Applicable Objectives and Policies of the Framework Element.

Table IV-10
Consistency with the Applicable Objectives and Policies of the Framework Element

Objective/Policy	Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Project would develop a creative office campus on a property that is currently vacant. The Project would contribute to the diversity of land uses along Culver Boulevard, which currently includes commercial, and other land uses.
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**Consistent.** The Project would develop a creative office campus on a property that is currently vacant. Multiple public transportation opportunities are provided near the Project Site. The MTA local line 108, Big Blue Bus Lines 3 and 14, and the Culver City Bus Lines 1, 4, 5, and 7 are all available near the Project Site. The Project would provide opportunities for employees and visitors to use public

Table IV-10
Consistency with the Applicable Objectives and Policies of the Framework Element

Objective/Policy	Project Consistency
	transit for work trips, and walk to other retail businesses near the Project Site. As such, the Project would support the reduction of vehicle trips, vehicle miles travelled, and air pollution.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Project would include office land uses. The Project would be accessible to bicycles and bicycle parking would be provided in accordance with the LAMC. Furthermore, Alla Road is identified as part of the Bicycle Lane Network in the *Mobility Plan 2035*.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	**Consistent.** The Project would enhance the character of an existing area by providing office land uses along Culver Boulevard in the developed area of Del Rey.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**Consistent.** The Project would provide new development that is consistent with existing land uses in the Del Rey community, which includes a mix of commercial, residential, and retail land uses. The Project would not encroach upon or cause the removal or relocation of land uses in existing neighborhoods or districts.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**Consistent.** The Project would develop office uses on a property that is currently vacant. Multiple public transportation opportunities are provided near the Project Site. The MTA local line 108, Big Blue Bus Lines 3 and 14, and the Culver City Bus Lines 1, 4, 5, and 7 are all available near the Project Site. The Project would provide opportunities for employees and visitors to use public transit for work trips, and walk to other retail businesses near the Project Site. The area in which the Project Site is located is already functioning as a center for the region.
Policy 5.2.2: Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime.	**Consistent.** The Project's proposed land uses would be consistent with the existing surrounding land uses. The Project would develop a creative office campus in the dense Del Rey community, near the Marina Freeway. The Project's massing and height would also be of a scale and built form consistent with the existing nearby land uses. The land uses would support transit use during both the daytime and nighttime.

Source: City of Los Angeles, The Citywide General Plan Framework Element, website: http://cityplanning.lacity.org/cwd/framwk/contents.htm, accessed: April 2016; EcoTierra Consulting, 2016.

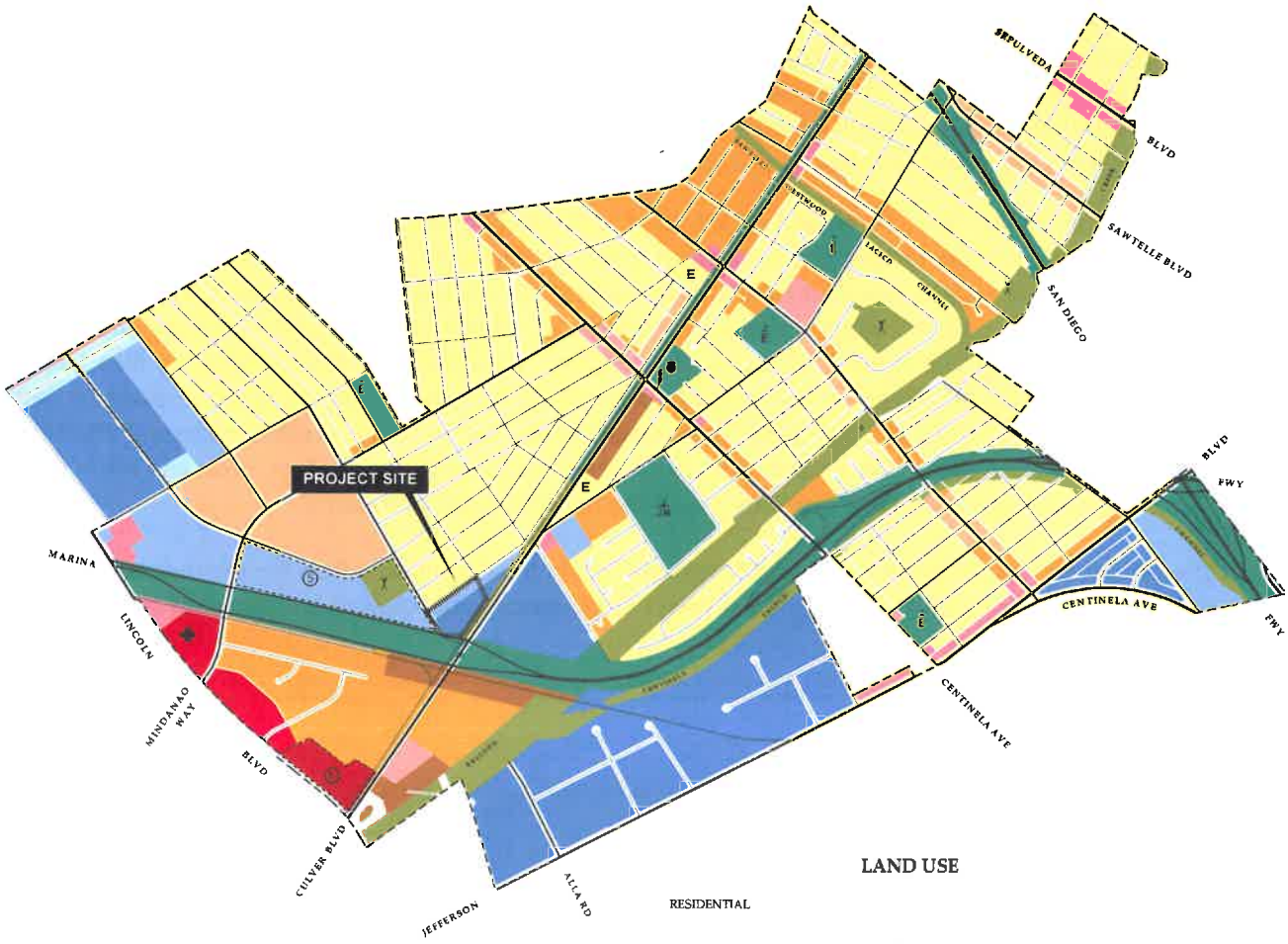
Therefore, the Project would be consistent with the applicable goals, objectives, and policies in the General Plan Framework Element.

Palms-Mar Vista-Del Rey Community Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The *Palms-Mar Vista-Del Rey Community Plan* (Community Plan) guides land uses on the Project Site and in the surrounding areas. The current plan sets forth objectives to maintain the community's distinctive character.

As shown in Figure IV-2, Community Plan Land Use Designations, within the Community Plan, the northern portion of the Project Site is designated for Limited Manufacturing, and the southern portion of the Project Site is designated for Light Manufacturing. Development of the Project would include the construction of a creative office campus. This type of development would be consistent with the Limited and Light Manufacturing land use designations. Footnote 1 on the Community Plan land use map limits the FAR permitted by the existing zones. Both land use designations correspond to Height District 1. Section 12.21.1.A of the LAMC states that Height District No. 1 is restricted to an FAR of 1.5:1, or 1.5 times the lot area. The Project floor area would be 155,000 square feet, with an FAR of 0.61:1. Therefore, the Project would be consistent with the height district limitations.

The consistency of the Project with applicable policies in the Community Plan for the industrial land use designation is presented in Table IV-11, Project Consistency with Applicable Policies of the Palms-Mar Vista-Del Rey Community Plan.



Source: Palms - Mar Vista - Del Rey Community Plan, June 27, 2007.

EcoTierra consulting

Figure IV-2
Palms-Mar Vista-Del Rey Community Plan Land Use Designations

Table IV-11
Project Consistency with Applicable Policies of the Palms-Mar Vista-Del Rey Community Plan

Policies	Project Consistency
Objective 3-1: To provide a viable industrial base with job opportunities for residents with minimal environmental and visual impacts to the community.	**Consistent.** The Project would include approximately 155,000 square feet of office space. This new space would provide employment and business opportunities to the Del Rey community.
Policy 3-1.2: Ensure compatibility between industrial and other adjoining land uses through design treatments, compliance with environmental protection standards and health and safety requirements.	**Consistent.** The Project would improve the street frontage by replacing a vacant lot with a land use that would contribute to the surrounding area. The office buildings would be designed in a modern architectural style that utilizes a natural palette that references the proximity to the beach and the Ballona Wetlands. Moreover, similar building masses exist in the Project vicinity including existing commercial buildings generally located between McConnell Avenue and Marina Freeway to the east, and Glencoe Avenue and the Marina Freeway to the west. Furthermore, the Project would meet the requirements of the Los Angeles Green Building Code, which requires a number of sustainable measures including the installation of water conservation and energy efficient design elements. In addition, the Project would include bicycle parking spaces.
Policy 3-1.3: Require that any proposed development be designed with adequate buffering and landscaping and that the proposed use be compatible with adjacent residential development.	**Consistent.** The Project would comply with all applicable setback requirements in the LAMC and would include a landscaped common area that would create an inviting open space that draws inspirations from the vegetation of the Ballona Wetlands.

Source: City of Los Angeles, Palms-Mar Vista-Del Rey Community Plan, September 16, 1997; EcoTierra Consulting, 2016.

Therefore, the Project would be consistent with the applicable policies in Palms-Mar Vista-Del Rey Community Plan.

Los Angeles Coastal Transportation Corridor Specific Plan

The Project is also located within the *Los Angeles Coastal Transportation Corridor* (Specific Plan). The Specific Plan area encompasses all or parts of the Westchester-Playa del Rey Community Plan area, the Palms-Mar Vista-Del Rey Community Plan area, the Venice Community Plan area, and the Los Angeles International Airport Interim Plan area. The Specific Plan area is generally bound by the City of Santa Monica on the north, the San Diego Freeway on the east, Imperial Highway on the south, and the Pacific Ocean on the west. The overall purpose of the Los Angeles Coastal Transportation Corridor is to:

- Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by projected new commercial and industrial development within the corridor;
- Establish the Coastal Transportation Corridor Impact Assessment Fee process for new development in the C, M, and P zones and for development on property owned by the Department of Airports;

- Regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses;
- Establish a Coastal Transportation Corridor infrastructure implementation process;
- Promote or increase work-related ridesharing and bicycling to reduce peak-hour trips and to keep critical intersection from severe overload;
- Avoid Peak Hour Level of Service (LOS) on streets and interchanges from reaching LOS F or, if presently at LOS F, preclude further deterioration in the Level of Service;
- Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
- Reduce commute trips by encouraging the development of affordable housing at or new job sites;
- Ensure that the public transportation facilities that will be constructed with funds generated by the Specific Plan will significantly benefit the contributor; and
- Encourage Caltrans to widen the San Diego Freeway for high-occupancy vehicle lanes.

Additionally, the Specific Plan imposes a Transportation Impact Assessment (TIA) Fee upon applicants of new, non-residential development stating:

> *"Prior to the issuance of any building, grading or foundation permit, an Applicant shall pay or guarantee a Transportation Impact Assessment (TIA) Fee to the Department of Transportation. The TIA Fee shall be for the purpose of funding the transportation improvements listed in...[the] Specific Plan."*

As the Project Site is located within the Specific Plan Area, development of the Project would be required to comply with any traffic mitigation measures or fees set forth by the Specific Plan. With implementation of required mitigation measures and/or payment of required fees, as determined by the Department of Transportation, potential impacts would be less than significant.

Planning and Zoning Code

All on-site development activity is subject to the Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City. As shown in Figure IV-3, Zoning Map, the northern boundary of the Project Site is zoned as M1-1 (Limited Industrial – Height District 1). The southern portion of the Project Site is zoned M2-1 (Light Industrial – Height District 1).

Land uses allowed in the M1 zone include, but are not limited to, the following:

- Any use permitted in the MR1 zone, including offices, and the C2 zone.
- Stadiums, arenas, or auditoriums.
- Automobile parking.
- Indoor swap meets.
- Storage buildings for household goods.

- Wireless telecommunication facilities.
- Used automobile and trailer sales area.
- Automotive repair.

Land uses allowed in the M2 zone include, but are not limited to, the following:

- Any open lot use permitted in the A zone and the R zone.
- Any use permitted in the M1 zone, including offices, or the MR2 zone.
- Aircraft landing field.
- Junk yard.
- Storage buildings.
- Cemetery, columbarium, crematory or mausoleum.
- Circus quarters, menagerie or keeping of wild animals.
- Morgue.
- Riding academy or stable.
- Automobile parking.
- Curing, composting and mulching facilities.
- Cargo container storage yard.

The Project would be consistent with the current M1 and M2 zone in the Planning and Zoning Code. The Project Site would be developed with 155,000 square feet of office space with a separate above-grade parking structure, as allowed in the M1 and M2 zones.

The Project Site is located in Height District 1. LAMC Section 12.21.1.A of the LAMC states that Height District No. 1 in the M1 and M2 zones are restricted to an FAR of 1.5:1. The Project floor area would be 155,000 square feet, with an FAR of 0.61:1. There is no specific height limit on the Project Site. Therefore, the Project would be consistent with the height district limitations.

Per the City of Los Angeles Zoning Code Section 12.21A4, the Project is required to provide one parking space for every 500 square feet of commercial or business office. For the proposed 155,000 square feet of creative office use, the Project is required to provide a total of 310 parking spaces. The Project is proposing to provide 600 parking spaces. The Project is providing parking above the City-requirement to assure that no occupants or visitors park within the adjacent residential community. Fifty-four spaces are proposed as surface parking and remaining 546 spaces would be provided in a 4-level above-grade parking structure.

Bicycle parking also would be provided for the office uses, as required by the LAMC. For the proposed 155,000 square feet of creative office space, the Project is required to provide 16 short-term and 31 long-term bicycle parking spaces for a total of 47 bicycle parking spaces. 47 bicycle parking spaces would be provided for the Project. The bicycle parking spaces would be provided within the above-grade parking structure.

Project Site

Source: City of Los Angeles Planning Zimas Maps, April 2016.

EcoTierra consulting

Figure IV-3
City Zoning Designations

Los Angeles Green Building Code

On January 3, 2014, the City implemented Ordinance No. 182,849 as the most recent update to the *Los Angeles Green Building Code* (LA Green Building Code). The LA Green Building Code is based on the 2013 California Green Building Standards Code (commonly known as CALGreen, as discussed above), that was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential);
- All additions (residential and non-residential); and
- Alterations with building valuations over $200,000 (residential and non-residential).

The Project would meet the requirements in the City's Green Building Code and California Energy/Title 24 requirements. The Project would include, at a minimum low-flow toilets, and other plumbing fixtures. The Project would also incorporate a grey-water system for use in on-site irrigation.

Walkability Checklist: Guidance for Entitlement Review

In January of 2007, the Department of City Planning created the *Walkability Checklist: Guidance for Entitlement Review* (Walkability Checklist). The purpose of the Walkability Checklist is to guide the Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City. The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. Each of the implementation strategies in the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. While the Walkability Checklist is neither a requirement nor part of the Planning and Zoning Code, it provides guidance for consistency relating to the policies contained in the General Plan Framework Element. Incorporating these guidelines into a project's design encourages pedestrian activity, more adequate forms, and placemaking.

While the guidance provided by the Walkability Checklist is not mandatory and is not a part of the LAMC, incorporating the criteria listed to the maximum extent feasible would create a more walkable environment and a higher quality of urban form for the Project. The essential purpose of the Walkability Checklist is to guide Department of City Planning staff in working with developers to make developments more "walkable" by way of enhancing pedestrian activity, access, comfort, and safety. In addition, the Walkability Checklist encourages planners and developers to protect neighborhood character and pursue high-quality urban form. The following is an analysis of the Project's consistency with the applicable guidelines.

Sidewalks

The Project generally supports the walkability guidelines discussing sidewalks, which provide that pedestrian corridors should be delineated by creating a consistent rhythm, should be wide enough to accommodate pedestrian flow, and provide pedestrian safety, specifically by creating a clear separation from the roadway and from traffic. Pedestrian access would continue to be provided via the Alla Road and Panama Street. However, new sidewalks are proposed along the SR-90 Westbound Off-Ramp, Alla Road, and Panama Street.

Utilities

The Project generally supports the walkability guidelines discussing utilities, which provide that ideally utilities should be placed underground in order to improve and preserve the character of the street and neighborhood, increase visual appeal, and minimize obstructions in the pedestrian travel path. If new utility equipment is needed,[57] the Project would place utility equipment underground and/or in the specified zones outlined in the Walkability Checklist.

Building Orientation

The Project generally supports the walkability guidelines discussing building orientation, which provide that a building's placement on a site establishes its relationship to the sidewalk and street and could enhance pedestrian activity. Pedestrian access would be provided via Alla Road and Panama Street.

Off-Street Parking and Driveways

The Project generally supports the walkability guidelines discussing off-street parking and driveways, which provide that the safety of the pedestrian is primary in an environment where pedestrians and automobiles must both be accommodated. Vehicular access to the Project Site is proposed along two streets: Panama Street and Alla Road. Panama Street driveway is proposed to be located between Alla Road and Beethoven Street, along the northwest corner of the Project Site. The driveway would provide full vehicular access. The Alla Road driveway is proposed to be located along the small segment of Alla Road between Marina Freeway (SR-90) Westbound Off-Ramp and Panama Street. This driveway is proposed to provide full inbound access but limited to only right turns outbound because of its proximity to the intersection of Culver Boulevard and SR-90 Westbound Off-Ramp. Both driveways would be configured with one inbound and one outbound lane.

On-Site Landscaping

While building plans are still in the preliminary phase, the Project would be designed to generally support the walkability guidelines discussing on-site landscaping. Consistent with these guidelines, the Project would incorporate landscaping that would facilitate pedestrian movement where appropriate and provide separation between service areas and public zones, as well as to define edges throughout the varying elements of the Project. Furthermore, the Project would include a central lawn area, with a bocce ball court, a table tennis corner, outdoor exercise area, and outdoor open seating work areas.

Building Façade

The Project generally supports the walkability guidelines discussing building façade, which provide that a building's facade could be employed to meet many objectives for a safe, accessible, and comfortable pedestrian environment, specifically by adding visual interest and emphasizing pedestrian movement and comfort.

Building Signage and Lighting

While building plans are still in the preliminary phase, the Project would be designed to generally support the walkability guidelines discussing building signage and lighting, which describe signage as part of the visual urban language and contributing to neighborhood identity and "place making". The

[57] *The Project does not include the placement of existing utilities underground.*

Project would include pedestrian-scale way-finding signage and pedestrian-scale lighting to facilitate access to the building for safety and security purposes.

Project lighting would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.

Overall, the Project would not conflict with any applicable land use plan, policy, or regulation. Impacts would be less than significant and no mitigation measures are required.

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

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant adverse effect could occur if a Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan.

As discussed in Question 4(f) above, no such plans presently exist which govern any portion of the Project Site. Furthermore, the Project Site is located in a developed area of the City. Therefore, the Project would not have the potential to cause such effects and there would be no impact. No mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the land use and planning analysis above, including community division, consistency with land use plans, and consistency with habitat conservation plans. The cumulative impacts land use study area is the extent of the related projects and the Community Plan area.

With respect to community division and habitat conservation plans, it is unknown whether or not any of the related projects or other development in the Community Plan area would divide an existing community or conflict with a habitat conservation plan. However, as the Project would have no impact with respect to community division and habitat conservation plans, it would not contribute to a cumulative impact.

Development of the related projects is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the related projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

11. MINERAL RESOURCES

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

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral

extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is developed and no oil wells are present. According to the Los Angeles City General Plan Safety Element Exhibit E, Oil Field and Oil Drilling Areas, the Project Site is not located within an oil field or oil drilling area.[58] The Project Site is not located in an Oil Drilling District. The Project would not affect ongoing extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. The Project would not involve mineral extraction activities, nor are any such activities presently occurring on or in the vicinity of the Project Site. Therefore, no impact would occur and no mitigation measures are required.

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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the project site is located in an area used or available for extraction of a locally-important mineral resource, or if the project development would convert an existing or future locally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for locally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

There are no oil extraction operations and drilling or mining of mineral resources at the Project Site. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, no impact would occur and no mitigation measures are required.

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[58] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, May 1994.*

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the mineral resources analysis above, including loss of availability of a known mineral resource or locally important mineral resource recovery site. The cumulative impacts mineral resources study area is the extent of the related projects.

It is unknown whether or not any of the related project sites contain mineral resources. However, as the Project would have no impact on mineral resources, it would not contribute to a cumulative impact. Furthermore, no known mineral resources or extraction operations for such resources are in the Project vicinity. Therefore, there would be no cumulative impact on mineral resources.

12. NOISE

The following section summarizes and incorporates by reference the information provided in the *Environmental Noise Impact Analysis for the Panama/Alla Creative Campus Project,* by Cadence Environmental Consultants, dated April 2016 (Noise Report), which is provided as Appendix J to this Initial Study.

Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources, such as an occasional aircraft or train passing by to virtually continuous noise sources like traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq} – The equivalent energy noise level is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- L_{min} – The minimum instantaneous noise level experienced during a given period of time.

- L_{max} – The maximum instantaneous noise level experienced during a given period of time.

- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 10 dBA "penalty" added to noise during the hours of 10:00 P.M. to 7:00 A.M., and an additional 5 dBA penalty during the hours of 7:00 P.M. to 10:00 P.M. to account for noise sensitivity in the evening and nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

When evaluating changes in 24-hour community noise levels, a difference of 3 dBA is a barely perceptible increase to most people. A 5 dBA increase is readily noticeable, while a difference of 10 dBA would be perceived as a doubling of loudness. Because decibels are logarithmic units, sound levels cannot be added or subtracted by ordinary arithmetic means. For example, if one source generates 50 dBA, two units would not generate 100 dBA; they would generate 53 dBA. A doubling of sound energy is needed to increase sound levels by 3 dBA. An increase of 5 dBA requires more than a tripling of sound energy.

Noise levels from a particular source decline as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer homes is generally more than 30 dBA.

Fundamentals of Environmental Ground-borne Vibration

Environmental vibration is sound radiated through the ground. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby, creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as ground-borne vibration. Ground-borne vibration is measured as peak particle velocity (PPV) in inches per second. The general human response to different levels of ground-borne vibration velocity levels is described below in Table IV-12, Human Response to Levels of Ground-borne Vibration. Ground-borne vibration levels that could induce potential damage to buildings are identified in Table IV-13, Ground-borne Vibration Damage Potential Criteria.

Table IV-12
Human Response to Levels of Ground-Borne Vibration

Human Response	Maximum PPV in Inches per Second	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.1
Severe	2	0.4

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source of table data: California Department of Transportation, 2004.

Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible.

Table IV-13
Ground-Borne Vibration Damage Potential Criteria

Structure and Condition	Maximum PPV in Inches per Second	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely Fragile Historic Buildings, Ruins, Ancient Monuments	0.12	0.08
Fragile Buildings	0.2	0.1
Historic and Some Old Buildings	0.5	0.25
Older Residential Structures	0.5	0.3
New Residential Structures	1	0.5
Modern Industrial/Commercial Buildings	2	0.5

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source of table data: California Department of Transportation, 2004.

Existing Ambient Noise Levels

Existing daytime noise levels were measured at three locations within the Project Site and surrounding area on April 21, 2016. The existing noise levels were measured using a Larson•Davis Model 820 sound level meter, which meets and exceeds the minimum industry performance requirements for "Type 1" standard instruments as defined in the American National Standards Institute (ANSI) S1.4. The sound

level meter was programmed to measure using the "A" weighting scale and the "fast" detector response as recommended by the California Department of Transportation (Caltrans). The sound level meter was calibrated immediately prior to the first measurement to a sound level of 114 dB with a Larson•Davis Precision Acoustic Calibrator Model CAL200. Each event occurred over a period of 15 minutes. The three measurement locations are shown in Figure IV-4, , and described as follows:

- Location 1 - Northern side of Panama Street across from the Project Site. Noise levels were measured adjacent to the sidewalk in front of the home at 12937 Panama Road. The primary sources of noise at this location were traffic on the Marina Freeway, Panama Street, and Alla Road. Other sources of noise included an aircraft overflight, aircraft takeoffs at Los Angeles International Airport, a person talking, and birds crowing. A total of nine vehicles passed by the site along the Panama Street frontage road during the 15-minute measurement period. Noise levels at this location would also be representative of the other residential properties along Panama Street between Alla Road and Beethoven Street.

- Location 2 - western side of Alla Road north of Panama Street. Noise levels were measured in the side driveway for the homes located at 12966 and 19968 Rubens Avenue. The primary source of noise at this location was traffic on Alla Road and the Marina Freeway. A total of 170 vehicles passed by the measurement location along Alla Road during the 15-minute measurement period.

- Location 3 - western side of Alla Road south of Panama Street. Noise levels were measured along the western boundary of the Project Site. The primary source of noise at this location was traffic on Alla Road and the Marina Freeway. A total of 195 vehicles passed by the measurement location along Alla Road during the 15-minute measurement period.

The daytime noise levels measured at each of the locations are identified in Table IV-14, Existing Daytime Noise Levels.

Table IV-14
Existing Daytime Noise Levels

Noise Measurement Location	Primary Noise Sources	Noise Level Statistics		
		Leq	Lmax	Lmin
1. Northern side of Panama Street across from the project site.	Traffic on Marina Freeway, Panama Street, and Alla Road.	57.9	73.6	52.7
2. Alla Road north of Panama Street.	Traffic on Alla Road and Marina Freeway.	66.3	78.6	50.0
3. Alla Road south of Panama Street.	Traffic on Alla Road and Marina Freeway.	69.5	96.6	57.3

Noise level measurement results are provided in Appendix A of the Noise Report (Appendix J of this Initial Study).

Source: Cadence Environmental Consultants, 2016.

Project Site

Noise Monitoring Location

Source: GoogleEarth, January 2016.

0 450

Scale (Feet)

N

EcoTierra consulting

Figure IV-4

Noise Monitoring and Sensitive Receptor Location Map

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?

Less-Than-Significant Impact. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the *City of Los Angeles General Plan Noise Element* (Noise Element) and the *City of Los Angeles Noise Ordinance* (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC). Implementation of the Project would result in an increase in ambient noise levels during both construction and operation, as discussed in detail below.

Construction-Related Impacts

As discussed previously, construction of the Project is anticipated to begin in the fourth quarter of 2016 and take place over a period of approximately 12 months. Construction activities associated with the Project would require the use of heavy equipment for site grading and building construction. Noise from smaller power tools, generators, and other sources of noise would also be associated with construction of the Project. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the type and amount of equipment in operation and the location of the activity.

Section 41.40 of the LAMC regulates noise from demolition and construction activities. Specifically, Section 41.40 prohibits construction activity and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

Section 112.05 of the LAMC also specifies the maximum noise level of construction machinery that can be generated in any residential zone of the city or within 500 feet thereof. Specifically, any construction machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment may not generate a maximum noise level exceeding 75 dBA at a distance of 50 feet from the equipment. However, the above noise limitation does not apply where compliance is technically infeasible (Section 112.05, LAMC). LAMC Section 112.05 defines technical infeasibility to mean that "said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment."

For the purpose of evaluating construction noise impacts, the City of Los Angeles L.A. CEQA Thresholds Guide (2006) defines sensitive uses as residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. As such, the sensitive receptors that would be affected by Project construction activities would be the existing multi-family buildings in the immediate vicinity of the Project Site. According to the L.A. CEQA Thresholds Guide, a significant impact would occur if construction activities lasting more than 10 days in a three month period would increase the ambient noise levels by 5 dBA or more at any off-site noise-sensitive location.

The Federal Highway Administration has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. These data are presented in

Table IV-15, Typical Construction Equipment Noise Levels, for the types of equipment that are expected to be used at the Project Site based on industry standard practices and observations of other similar construction sites.

Table IV-15
Typical Construction Equipment Noise Levels

Equipment	L_{max} Noise Limit at 50 Feet
Earthmoving	
Backhoe	80
Bulldozer	85
Dump Truck	84
Front End Loader	80
Scraper	85
Tractor	84
Materials Handling	
Concrete Mixer Truck	85
Concrete Pump Truck	82
Crane	85
Impact Equipment	
Compactor	80
Jackhammer	85
Pneumatic Tools	85
Other Equipment	
Compressors	80
Concrete Saws	90
Gradall Forklift	85
Pickup Truck	55
Vacuum Street Sweeper	80
Welder/Torch	73

Notes: Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.

Source of table data: Federal Highway Administration, 2006.

The Federal Highway Administration has also compiled data regarding the noise generating characteristics of typical construction activities. These data, which represent composite construction noise, are presented in Table IV-16, Typical Outdoor Construction Noise Levels. As with noise generated by individual construction equipment, these noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance.

As shown in Table IV-16, Typical Outdoor Construction Noise Levels, daytime composite construction noise levels associated with the Project could range from 77 to 86 dBA L_{eq} at a distance of 50 from the construction activities. The actual sound level at the nearest homes to the Project Site would be approximately 6 dBA less since these homes are about 100 feet from the nearest proposed building construction area. As shown previously in Table IV-14, Existing Daytime Noise Levels, existing ambient daytime noise levels in the residential area along Panama Street average around 58 dBA L_{eq}. Construction activities associated with the Project would increase daytime noise levels at the nearby residential uses by more than 5 dBA.

Compliance with the noise regulations under Section 41.40 of the LAMC, would reduce construction noise impacts to the maximum extent feasible. These regulations would not permit construction activities to occur during recognized sleep hours for nearby residences. Similar to other construction activities throughout Los Angeles, these regulations would ensure that construction-related noise impacts would be less than significant.

Table IV-16
Typical Outdoor Construction Noise Levels

Construction Phase	L_{eq} Noise Levels at 50 Feet with Mufflers
Excavation/Grading	86
Foundations	77
Structural	83
Finishing	86
Source of table data: City of Los Angeles, 2006.	

Operational Impacts

Future noise levels at the Project Site would continue to be dominated by vehicular traffic on the Marina Freeway and Alla Road. As discussed previously, existing ambient daytime noise levels along the western perimeter of the project site average approximately 70 dBA L_{eq}. As a general rule 24-hour CNEL noise levels are within about 2 dBA of the peak traffic noise L_{eq} under normal traffic conditions.[59] This noise level would not exceed the city's 75.0 dBA CNEL exterior noise standard for new office uses. As discussed previously, the exterior-to-interior reduction of newer office buildings is generally more than 30 dBA. This is based on the situation in which new buildings must comply with California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, which requires substantial building insulation and also reduces exterior to interior noise levels. Assuming a 30 dBA exterior to interior noise reduction for new office buildings would provide an interior noise level of less than 45 dBA CNEL, which is the state's interior standard for residential uses.

The City of Los Angeles has adopted a Noise Ordinance (Section 111 et seq. of the LAMC), which identifies noise standards for various sources, specific noise restrictions, exemptions, and variances for sources of noise within the city. The Noise Ordinance applies to all noise sources with the exception of any vehicle that is operated upon any public highway, street or right-of-way, or to the operation of any

[59] *ICF Jones & Stokes, 2009.*

off-highway vehicle, to the extent that it is regulated in the State Vehicle Code, and all other sources of noise that are specifically exempted. The sources regulated by the City Noise Ordinance that would be applicable to the Project are as follows:

- Section 112.01 Radios, television sets, and similar devices.
- Section 112.02 Air conditioning, refrigeration, heating, pumping, and filtering equipment.
- Section 112.04 Powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices.
- Section 112.05 Maximum noise level of powered equipment or powered hand tools.
- Section 113.01 Rubbish and trash collection.
- Section 114.02 Motor driven vehicles.
- Section 114.06 Vehicle theft alarm systems.
- Section 114.07 Audible status indicator (for vehicle theft alarms systems).
- Section 115.02 Prohibitions and regulations (for amplified sound).
- Section 114.01 Loud, unnecessary and unusual noise.

These regulations ensure that sources of noise at a property do not cause excessive noise levels at nearby residences.

Based on this information, operation of the Project would not expose persons to or generate noise levels in excess of standards established by the City of Los Angeles and the impact of the Project would be less than significant.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less-Than-Significant Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Construction-Related Impacts

Demolition and construction activities that would occur at the Project Site have the potential to generate low levels of ground-borne vibration. The buildings adjacent to the Project Site consist of newer residential structures of more modern steel, concrete, and wood construction. Based on the criteria identified previously in Table IV-13, Ground-borne Vibration Damage Potential Criteria, a significant structural ground-borne vibration impact could occur if the adjacent residential buildings are exposed to vibration levels of 0.3 inches per second PPV. The potential for nearby residents to be annoyed by ground-borne vibration would be significant if vibration levels reach 0.10 inches per second PPV.

Table IV-17, Vibration Levels for Typical Construction Equipment, identifies various vibration velocity levels for the types of construction equipment that would operate at the Project Site during construction. Based on the information presented in this table, vibration levels could reach as high as

approximately 0.089 inches per second PPV within 25 feet of the an operating large bulldozer. The maximum vibration level of 0.089 inches per second PPV would be below the thresholds of significance for both potential building damage and human annoyance. Therefore, the potential impacts associated with construction vibration would be less than significant.

Operational Impacts

The Project does not include uses that are expected to generate measurable levels of ground-borne vibration during operation of the Project. Therefore, the greatest regular source of project-related ground-borne vibration would be from local trucks making deliveries to the Project Site and larger garbage trucks picking-up project-related refuse material. The vibration levels associated with these trucks would be less than the levels associated with large construction equipment. Therefore, the operational impacts associated with ground-borne vibration would be less than significant at nearby sensitive uses.

Table IV-17
Vibration Levels for Typical Construction Equipment

Equipment	Reference PPV at 25 Feet
Large Bulldozer	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source of table data: Jones & Stokes, 2004.	

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

Less-Than-Significant Impact. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide (2006), the Project would have a significant operational noise impact if the Project would increase the ambient noise levels by 3 dBA CNEL at the property line of residential uses where the resulting noise level would be at least 70 dBA CNEL, or any 5 dBA or greater increase. As discussed previously, the existing ambient daytime noise levels at the Project Site and surrounding residential area are in the mid-50 to 60 dBA L_{eq} range and, as such, would not approach 70 dBA CNEL. Therefore, the 5 dBA threshold of significance would be applicable to the Project.

Locations in the vicinity of the Project Site would experience a slight increase in noise resulting from the additional traffic generated by the Project and the increased activity at the Project Site. According to the Draft Transportation Analysis Report, the Project would generate an increase of approximately 777 vehicle trips per day with 81 trips occurring during the AM peak traffic hour and 91 trips during the PM peak traffic hour. The increase in 24-hour roadway noise levels along the residential segments of Panama Street and Alla Road are shown in Table IV-18, Project 24-Hour Roadway Noise Impacts. As shown, the Project would increase noise levels along St. Andrews Place by approximately 0.3 dBA CNEL, which would be imperceptible to most people and would not exceed the applicable thresholds of significance for the affected existing land uses.

Table IV-18
Project 24-Hour Roadway Noise Impacts

Roadway	Roadway Segment	Noise Levels in dBA L_{eq}				Significant Impact?
		Existing Traffic Volumes	Existing + Project Traffic	Increase	Significance Threshold	
Panama Street	Alla Rd. to driveway	60.1	62.3	2.2	5.0	No
	driveway to Beethoven	60.1	60.5	0.4	5.0	No

Notes: For locations where the resulting noise level would exceed the 70 dBA "normally unacceptable" level for residential uses, the significance threshold established by the L.A. CEQA Thresholds Guide is a 3.0 dBA increase. For all other locations, the significance threshold is 5.0 dBA.

Calculation data and results are provided in Appendix B of the Noise Report (Appendix J to this Initial Study).

Source: Cadence Environmental Consultants, 2016.

The changes in future peak hour noise levels along the study-area roadway segments with residential uses in the project vicinity are identified in Table IV-19, Project Peak Hour Roadway Noise Impacts. As shown, the traffic generated by the Project would increase local noise levels by a maximum of 0.1 dBA L_{eq}, which would be imperceptible to most people and would not exceed the applicable thresholds of significance for the affected existing land uses. Several locations would not experience any measurable increase in roadway noise levels with the Project. This would be a less than significant impact.

The Project would also result in increased vehicular activity within the Project Site. However, the parking areas and parking structure would largely be shielded from the residential uses along Panama Street by two of the proposed office buildings. Only the surface parking area in the eastern portion of the site would be exposed to two residences across Panama Street. The resulting noise levels would be similar to cars parking along Panama Street or within the existing parking area of the industrial property to the east of the Project Site. As such, the on-site activities would not substantially increase noise levels at the residential properties to the north of Panama Street. As such, the operational noise impacts of the Project would be less than significant. It is expected that the proposed buildings could help shield noise levels from the Marina Freeway and result in slightly reduced noise ambient noise levels at these homes.

Table IV-19
Project Peak Hour Roadway Noise Impacts

Roadway	Roadway Segment	Existing Traffic Volumes	Existing + Project Traffic	Increase in dBA L_{eq}	Significance Threshold	Significant Impact?
AM Peak Traffic Hour						
Alla Road	south of Glencoe Ave.	1,110	1,124	0.1	5.0	No
Marina EB Expy	east of Mindanao Wy.	2,352	2,366	0.0	5.0	No
Culver Boulevard	west of Centinela Ave.	1,721	1,738	0.0	5.0	No
Lincoln Boulevard	north of Maxella Ave.	4,197	4,213	0.0	5.0	No
	south of Jefferson Bl.	4,331	4,341	0.0	5.0	No
PM Peak Traffic Hour						
Alla Road	south of Glencoe Ave.	1,100	1,116	0.1	5.0	No
Marina EB Expy	east of Mindanao Wy.	2,563	2,567	0.0	5.0	No
Culver Boulevard	west of Centinela Ave.	1,748	1,771	0.1	5.0	No
Lincoln Boulevard	north of Maxella Ave.	4,181	4,198	0.0	5.0	No
	south of Jefferson Bl.	4,256	4,268	0.0	5.0	No

For locations where the resulting noise level would exceed the 70 dBA "normally unacceptable" level for residential uses, the significance threshold established by the L.A. CEQA Thresholds Guide is a 3.0 dBA increase. For all other locations, the significance threshold is 5.0 dBA.
Calculation data and results are provided in Appendix B of the Noise Report (Appendix J to this Initial Study).

Source: Cadence Environmental Consultants, 2016.

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?

Less-Than-Significant Impact. A significant impact may occur if a proposed project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the project. As discussed previously, noise levels during demolition and construction of the Project may potentially reach as high as 80 dBA L_{eq} at the nearest sensitive receptors. When these peak construction noise levels are compared against the existing ambient noise levels at the Project Site of approximately 61 dBA L_{eq}, which would be similar to the noise levels in the immediate vicinity of the Project Site, an increase in daytime noise levels by more than 5 dBA would occur at the nearby sensitive uses due to their direct proximity to the Project Site. As such, a substantial temporary or periodic increase in ambient noise levels would occur at these nearby sensitive uses during construction of the Project.

Although the Project would potentially generate high noise levels during the construction period as a result of heavy machinery and equipment use, compliance with the noise regulations under Section 41.40 of the LAMC would ensure that nearby sensitive receptors are not exposed to excessive noise levels during construction. Therefore, with compliance with the noise regulations in Section 41.40 of the LAMC, which would not permit construction activities to occur during recognized sleep hours for residences, construction noise impacts would be reduced to a less than significant level.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less-Than-Significant Impact. The Project Site is located just over two miles from both Los Angeles International Airport (LAX) and Santa Monica Municipal Airport. Although the site is subject to occasional over flights from jet and propeller aircraft, and jet aircraft takeoffs can be heard from LAX, it is not located within the noise impact area of either public airport land use plan. The impact of the Project would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. This question would apply to a project only if the project site were located in the vicinity of a private airstrip and would subject area residents and workers to substantial noise levels from aircraft operations. The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Development of the Project in conjunction with other related projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized Palms-Mar Vista Community Plan Area of the City of Los Angeles. The Draft Transportation Analysis Report for 12870 Panama Street Creative Office Project identifies 14 related projects within the vicinity of the Project Site.[60] The nearest related project is located approximately one-half mile from the Project Site south of the Marina Freeway and Ballona Creek.

Construction-Related Cumulative Impacts

The Project applicant has no control over the timing or sequencing of the related projects that have been identified within the Project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Construction-period noise and ground-borne vibration for the Project and each related project (that has not yet been built) would be localized. As discussed above, the nearest related project is located approximately one-half mile from the Project Site south of the Marina Freeway and Ballona Creek. That Project - and all of the other related projects - is located far enough away that construction activities at that location would have no noise effect and no ground-borne vibration effect on the sensitive residential uses in close proximity to the Project Site.

[60] *Fehr & Peers, 2016.*

Therefore, the Project would not contribute to significant short-term cumulative construction-related noise impacts in the immediate vicinity of the Project Site.

Operational Cumulative Noise Impacts

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the difference between existing traffic volumes and future traffic volumes with the Project and cumulative development. The increases in roadway noise levels associated with cumulative development are identified in Table IV-20, Cumulative Peak Hour Roadway Noise Impacts, for the two roadway segments and peak hours where the Project would have a measurable increase in noise levels. As shown, the traffic generated by the Project and cumulative development would increase local noise levels by a maximum of 0.2 dBA L_{eq}, which is inaudible/imperceptible to most people and would not exceed the City of Los Angeles thresholds of significance. Therefore, this cumulative impact would be less than significant.

As with the localized construction-related noise impacts, all of the other related projects are located far enough away that on-site equipment at those locations would have no noise effect on the sensitive residential uses in close proximity to the Project Site. On-site equipment at the Project would similarly have no noise effect on any sensitive uses in close proximity to the related project sites. Therefore, the Project would not contribute to cumulative noise impact associated with stationary and on-site operational noise sources.

Table IV-20
Cumulative Peak Hour Roadway Noise Impacts

Roadway	Roadway Segment	Existing Traffic Volumes	Future + Project Traffic	Increase in dBA L_{eq}	Significance Threshold	Significant Impact?
AM Peak Traffic Hour						
Alla Rd.	south of Glencoe Ave.	1,110	1,157	0.2	5.0	No
PM Peak Traffic Hour						
Alla Rd.	south of Glencoe Ave.	1,100	1,148	0.2	5.0	No
Culver Bl.	west of Centinela Ave.	1,748	1,801	0.1	5.0	No

Notes: For locations where the resulting noise level would exceed the 70 dBA "normally unacceptable" level for residential uses, the significance threshold established by the L.A. CEQA Thresholds Guide is a 3.0 dBA increase. For all other locations, the significance threshold is 5.0 dBA.
Calculation data and results are provided in Appendix B of the Noise Report (Appendix J to this Initial Study).

Source: Cadence Environmental Consultants, 2016.

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 may occur if a project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing growth shall be made considering:

(a) The degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment;

(b) Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and

(c) The extent to which growth would occur without implementation of the project.

Construction Impacts

The Project would involve the construction of 155,000 square feet of office space. Construction would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the City. Therefore, the construction workers would not likely relocate their homes as a result of employment on the Project. Impacts on population and housing due to construction activities would be less than significant and no mitigation measures are required.

Operational Impacts

The Project would involve the construction 155,000 square feet of office space. It is estimated that the office use would generate approximately 742 employees.[61] While new employment opportunities would be created with the Project, it is anticipated that most of the expected employees would be drawn from the existing labor force in the region and would not require the need to relocate or place a demand for housing in the area. This increase would be within the parameters of SCAG's forecast of 82,500 additional jobs in the City of Los Angeles between 2008 and 2020. The potential concentration of employment in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 10 (Land Use and Planning). These policies promote development activity in existing developed areas, especially near existing transit and

[61] *Based on a rate of 0.00479 employees per square foot. Source: Los Angeles Unified School District, Residential Development School Fee Justification Study, March 2014.*

transportation infrastructure, such as the Project Site, which is within walking distance of several Los Angeles County Metropolitan Transportation Authority (Metro), Big Blue Bus, and Culver City bus lines. The Palms-Mar Vista-Del Rey Community Plan policies also promote an arrangement of land use, circulation, and services which encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community. More specifically, the Community Plan encourages the development of projects that promote economic well-being and public convenience and to improve the visual environment of the community and, in particular, to strengthen and enhance its image and identity. Therefore, this projected employment growth would not cause growth (i.e., housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels, and would not result in an adverse physical change in the environment, or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan. Therefore, projected employment growth associated with the Project would be less than significant.

Furthermore, the Project does not include the extension of roads or other infrastructure, which could induce population growth. Therefore, the impact would be less than significant and no mitigation measures are required.

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 would result in the displacement of existing housing, necessitating construction of replacement housing elsewhere. There is no existing housing on the Project Site; therefore, development of the Project would not displace any existing housing and would not require construction of replacement housing. No impact would occur and no mitigation measures are required.

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 would result in the displacement of existing residents, necessitating the construction of replacement housing elsewhere. No people currently reside on the Project Site. Therefore, no people would be displaced by the Project. No impact would occur and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the population and house analysis above, including growth inducement, and housing and population displacement.

Employment, housing, and population projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects identified in Section II.6 (Related Projects) of this Initial Study and other potential development projects that may occur throughout the City of Los Angeles subregion are expected to be largely consistent with their respective General Plan land use designations. Furthermore, SCAG periodically updates its projections for the various subregions that comprise the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative employment growth associated with the Project and other development within the City of Los Angeles subregion will be accommodated in SCAG forecasts over time and the Project would not contribute to a cumulatively

considerable effect with respect to employment, housing, and population growth. Therefore, cumulative impacts would be less than significant.

14. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:

a) Fire protection?

Less-Than-Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; while for a commercial land use, the distance is one mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

Project Design Features

The Project would implement the following project design features (PDF) to minimize the potential for impacts during operation. The PDFs would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

PDF 14-1 The Project would implement the following project design features (PDF) to minimize the potential for impacts during construction and operation. The PDFs would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

PDF 14-2 The Project shall comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the Project design shall incorporate the standards and requirements as set forth by Title 24, the City of Los Angeles Safety Element, the LAMC Fire Code, and any additional code requirements established by the LAFD relative to fire prevention, safety, suppression, and emergency access and response.

PDF 14-3 The Project applicant shall submit a plot plan for approval of access and hydrants by the LAFD prior to the issuance of a building permit by the City. The plot plan shall include fire prevention and access features to the satisfaction of the LAFD, including the following standard requirements:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.

- Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet visual line of site of the main entrance stairwell or to the satisfaction of the LAFD.
- Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
- All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
- All structures shall be fully sprinklered pursuant to LAMC Section 57.09.07(A).
- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel.

The fire station nearest to the Project Site is Fire Station 67, which is located approximately 1.5 miles to the south at 5451 Playa Vista Drive, Los Angeles, CA 90094. This fire station is located within the recommended response distance.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing.[62] According to LAMC Section 57.09.06, the fire flow requirement for the Project's is 6,000-9,000 gpm from four to six fire hydrants flowing simultaneously with a residual water pressure of 20 PSI.[63] The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. The final fire flow required for the Project would be established by the LAFD during its review of the Project plot plan, prior to the issuance of a building permit by the City. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Additional fire hydrants may be required, depending on the building design and LAFD requirements. Such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process. Construction activities to install any new pipes or pumping infrastructure would be temporary and in short duration and would not result in any significant environmental impacts. Approval of this plot plan, and implementation of the project design features, would ensure the impact on fire protection would be less than significant and no mitigation measures are required.

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[62] *LAMC, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.06.*

[63] *LAMC, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.06.*

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6, [Related Projects]) with respect to the fire protection analysis above. The cumulative impacts fire protection study area is the extent of the related projects and the service area of Fire Station 67.

Development of the Project in combination with the related projects would cumulatively increase the demand for fire services. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Project and related projects would contribute. Moreover, all of the cumulative development would be reviewed by the LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. It is unknown whether or not any of the related projects would require new or expanded fire stations. If there were a fire protection impact due to the combined impacts of the related projects, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above. Considering this, the cumulative impact would be less than significant.

b) Police protection?

Less-Than-Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors:

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

Project Design Features

The Project would implement the following project design features (PDF) to minimize the potential for impacts during operation. The PDFs would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

PDF 14-4 The Project shall comply with the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and

building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the Project would:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
  - Monitoring entrances and exits;
  - Managing and monitoring fire/life/safety systems; and
  - Controlling and monitoring activities in the parking facilities.
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed "dead zones."

PDF 14-5 Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, the Applicant or its successor shall develop an Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by LAPD.

The Project Site is serviced by the Pacific Community Police Station, which is located at 12312 Culver Boulevard; approximately 0.7 miles northeast of the Project Site. The Project Site is located in Reporting District 1454 (Pacific Area).

Construction Impacts

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, the Project would employ construction safety features including erecting temporary fencing around the construction site to discourage trespassers and deter any potential criminal activity. Therefore, the impact would be less than significant and no mitigation measures are required.

Operational Impacts

Operation of the Project would result in an increase of population within the Project Site, thereby, generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons is anticipated to increase as a result of the increased on-site activity and increased traffic on adjacent streets. Such calls are typical of problems experienced in nearby neighborhoods and do not represent unique law enforcement issues specific to the Project. Design features that deter crime, including adequate and strategically positioned functional lighting to enhance public safety, minimizing visually obstructed and infrequently accessed "dead zones," and limiting public access to properly patrolled public areas, reduce the demand for police services. The design of the Project would also include crime prevention features, such as nighttime security lighting, secured parking facilities, and on-site security service. With implementation of these design features, in coordination with the LAPD, the Project would result in a less-than-significant operational impact on police protection services.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6 [Related Projects]) with respect to the police protection analysis above. The cumulative impacts police protection study area is the extent of the related projects and the service area of the Pacific Community Police Station.

It is anticipated that the Project in combination with the related projects would increase the demand for police services. This cumulative increase in demand for police services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, the related projects served by the LAPD would implement safety and security features according to LAPD recommendations. The LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Project and related projects would contribute. It is unknown whether or not any of the related projects would require new or expanded police stations. If there were a police protection impact due to the combined impacts of the related projects, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above. Nonetheless, the cumulative impact would be less than significant.

c) Schools?

Less-Than-Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the schools serving the project site. The Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs.

The LAUSD jurisdiction encompasses an area of 720 square miles and serves approximately 640,000 students and operates over 900 schools and 187 public charter schools.[64] The LAUSD is divided into

[64] *Los Angeles Unified School District website: http://achieve.lausd.net/about, accessed: April 13, 2016.*

seven local districts and the Project Site is located within Local District West. The Project Site is currently served by Short Avenue Elementary, Marina Del Rey Middle School, and Venice Senior High School.[65] Table IV-21, LAUSD School Capacity and Enrollment, presents the location, enrollment capacities, 2013 to 2014 enrollments, and number of students above or below capacity for each of the schools servicing the Project area. All three schools are currently operating under capacity.

Table IV-21
LAUSD School Capacity and Enrollment

School Type (Grade)	School Name	Location	No. of Tracks	2013-2014 Enrollment Capacity	2013-2014 Student Enrollment [a]	(-)Under / (+)Over Capacity
Elementary School (Grades K-6)	Short Avenue	12814 Maxella Avenue	1	400	382	-35
Middle School (Grades 7-8)	Marina Del Rey	12500 Braddock Drive	1	972	821	-190
Senior High School (Grades 9-12)	Venice	13000 Venice Boulevard	1	2,853	2,101	-463

[a] *Based on actual enrollment verses resident enrollment (total number of students living in attendance boundaries who are eligible to attend the school).*
Source (2013-2014 enrollment capacity and student enrollment): Written correspondence from Rena Perez, President, Facilities Services Division, Los Angeles Unified School District, February 17, 2016 (see Appendix K to this Initial Study).

As shown in Table IV-22, Estimated Project Student Generation, below, based on 2014 LAUSD student generation rates for office land uses, the Project would generate an increase of approximately 167 students.

Table IV-22
Estimated Project Student Generation

Land Use	Size	Employees per Square Foot	Students per Employee	Total Students
Office	155,000 sf	0.00479	0.2247	167
			Total	**167**

Source: Los Angeles Unified School District, Residential Development School Fee Justification Study, March 2014.

Although it is very likely that some of the students generated by the Project would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all students generated by the Project would be new to the school district. The addition of 167 new students to Short Avenue Elementary School would result in this school surpassing its' capacity for students. The addition of 167 new students to Marina Del Rey Middle School and Venice Senior High School would not result in the schools surpassing their capacities for students.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Development fees are required to be paid pursuant to development conditions of approval. Pursuant to

[65] *Written correspondence from Rena Perez, President, Facilities Services Division, Los Angeles Unified School District, February 17, 2016 (see Appendix K to this Initial Study).*

SB 50, the payment of these school fee amounts provided for in Government Code Sections 65995, 65995.5, and 65995.7 would constitute full and complete mitigation for school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impact of school facilities according to CEQA is to pay the maximum school fees and that such fees are "deemed to provide full and complete school facilities mitigation" related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code 65996[a] and [b]).

Pursuant to California Government Code Section 65995.5-7, the LAUSD has Level 1 Fees on commercial development at a rate of $0.54 per square foot of new commercial construction within the boundaries of the LAUSD.[66] Accordingly, project applicant(s) are required to pay school fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area.

Pursuant to State law, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the Project's indirect impacts on any schools. Therefore, the public schools servicing the Project Site can accommodate the future students generated by the Project. Therefore, impacts on the schools identified to serve the Project would be less than significant.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6 [Related Projects]) with respect to the schools analysis above. The cumulative impacts school study area is the extent of the related projects and the attendance boundaries of the LAUSD schools that serve the Project Site (i.e., Short Avenue Elementary School, Marina Del Rey Middle School, and Venice Senior High School).

As discussed above, payment of developer impact fees in accordance with Senate Bill 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the related projects would be required to pay school fees to the LAUSD. The payment of school fees would fully mitigate any potential impacts to school facilities. Therefore, the cumulative impact would be less than significant.

d) Parks?

Less-Than-Significant Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors:

- The net population increase resulting from a project;
- The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and a project's proportional contribution to the demand; and

[66] *2014 Developer Fee Justification Study, Los Angeles Unified School District, March 2014. These rates are subject to change.*

- Whether a project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The parks nearest to the Project Site are listed in Table IV-23, Parks and Recreational Facilities.

Table IV-23
Parks and Recreational Facilities

Type	Park Name	Address	Distance (miles)	Size (acres)
Neighborhood park	Glen Alla Park	4601 S. Alla Street	<1.0	4.82
Community park	Mar Vista Recreation Center	11430 W. Woodbine Avenue	<2.0	18.51
Community park	Westchester Recreation Center	7000 Manchester Avenue	<2.0	23.58

Note: sf = square feet

Source: Letter correspondence, City of Los Angeles Department of Recreation and Parks, Ramon Barajas, Assistant General Manager, Planning, Construction and Maintenance Branch, February 3, 2016 (see Appendix K to this Initial Study).

Although there are several parks in the vicinity of the Project Site, it is located in an area of the City that does not meet City's standard parkland-to-population ratio for neighborhood and community parks. However, the Project, a proposed creative office campus, would not increase the residential population within the Project area and, thus, would not increase demand for public parkland based on the standard minimum parkland-to-population ratio identified above. Therefore, impacts to parks and recreational facilities would be less than significant.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6 [Related Projects]) with respect to the parks analysis above. The cumulative impacts parks study area is a two-mile radius from the Project Site, which includes the three parks and recreational facilities listed above.

As discussed above, the Project would result in a less-than-significant impact on parks and recreational facilities. The related projects that involve the development of residences would be required to pay a Dwelling Unit Tax. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant.

e) Other public facilities?

Less-Than-Significant Impact. A significant impact may occur if a project includes 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, necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on libraries shall be made considering the following factors:

(a) The net population increase resulting from the project;

(b) The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to existing library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and

(c) Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

The libraries that currently serve the Project Site include the following:

- Mars Vista Branch Library, located at 12006 Venice Boulevard, with a size of 12,500 square feet;
- Playa Vista Branch Library, located at 6400 Playa Vista Drive, with a size of 10,500 square feet;
- Venice Branch Library, located at 501 South Venice Boulevard, with a size of 10,500 square feet; and
- Westchester-Loyola Branch Library, located at 7414 West Manchester Avenue, with a size of 12,500 square feet.

At 12,500 square feet, the Mars Vista Branch Library meets the current demand for library services in the community. The Mars Vista Branch Library is open six days and four nights a week. Currently, the Mars Vista Branch Library houses approximately 51,858 volumes and has 9.5 staff positions. It presently has resources for children, teens, adults, and Spanish speakers. The Mars Vista Branch Library also provides free wireless Internet access and wireless printing. Similar to every branch of the LAPL, the Mars Vista Branch Library offers free use of computer workstations that provide access to the LAPL's information network. These workstations also provide Internet access, the ability to search the LAPL online catalog, subscription databases, word processing and language learning tools, access to an historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.[67]

Three additional branch libraries also service the Project area.[68] The existing facilities adequately meet the current demand for library services. The Project would generate approximately 742 employees[69] and would not result in the generation of permanent residents. The type of jobs associated with office developments are typically filled by persons already residing in the vicinity of or within commuting distance of the workplace and not likely to relocate their households due to such employment opportunities. Further, the current and expected labor force may already be residents within the LAPL service area and not new to the entire system. Therefore, the Project would not result in the need for expanded or newly constructed library facilities and no impact would occur.

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[67] *Email correspondence, City of Los Angeles Public Library, Tom Jung, Management Analyst II, Business Office, March 1, 2016 (see Appendix K to this Initial Study).*

[68] *Email correspondence, City of Los Angeles Public Library, Tom Jung, Management Analyst II, Business Office, March 1, 2016 (see Appendix K to this Initial Study).*

[69] *Based on a rate of 0.00479 employees per square foot. Source: Los Angeles Unified School District, Residential Development School Fee Justification Study, March 2014.*

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6, [Related Projects]) with respect to the libraries analysis above. The cumulative impacts libraries study area is the extent of the related projects and the service area of the libraries that serve the Project Site (i.e., Mars Vista Branch Library, Playa Vista Branch Library, Venice Branch Library, and Westchester-Loyola Branch Library).

The related projects that involve the development of residences could increase the demand upon library services. However, library funding is mandated under the City Charter to be funded from property taxes, including those assessed against the Project, which would increase with the new development. The Project as well as the related projects would be required to pay these fees as applicable. It is unknown whether or not any of the related projects would require new or expanded libraries. If there were an impact on libraries due to the combined impacts of the related projects, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above. Nonetheless, the cumulative impact would be less than significant.

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 may occur if a project would include substantial employment or population growth which could generate an increased demand for park or recreational facilities that would exceed the capacity of existing parks and causes premature deterioration of the park facilities. As discussed previously, the Project would not increase the residential population within the project area and, thus, would not increase demand for public parkland based on the standard minimum parkland-to-population ratio identified above. Therefore, Project impacts would be less than significant with respect to the deterioration of park or recreational facilities.

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

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities, the construction of which would have a significant adverse effect on the environment. The Project does not include nor would it necessitate a park or recreational facility component, the construction of which could have an adverse environmental impact. Therefore, no impact would occur with respect to the construction or expansion of recreational facilities and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the eight related projects (see Section II.6 [Related Projects]) with respect to the recreational facilities analysis above. The cumulative impacts recreational facilities study area is a two-mile radius from the Project Site, which includes the three parks and recreational facilities listed above.

The related projects that involve the development of residences would potentially result in an increase in residents in the area. In the absence of the related projects incorporating project-specific mitigation,

cumulative development would potentially contribute to lowering the City's existing parkland-to-population ratio. The related projects that involve the development of residences would be required to pay a Dwelling Unit Tax. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant.

16. TRANSPORTATION/TRAFFIC

The following section summarizes and incorporates by reference the information provided in the *Transportation Analysis Report for 12870 Panama Street Creative Office Project,* prepared by Fehr & Peers, in April 2016 (Traffic Report). The Traffic Report is provided as Appendix L to this Initial Study. The *Traffic Impact Assessment for the Proposed Creative Office Campus Project To Be Located at 12870 West Panama Street*, prepared by the City of Los Angeles Department of Transportation, in April 2016 has also been incorporated for reference (Traffic Assessment) and is provided as Appendix M to this Initial Study.

a) Would the project conflict with 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 Unless Mitigation Incorporated. A significant impact could occur if a project were to result in substantial increases in traffic volumes in the vicinity of a project site 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.

Construction Traffic Impacts

The Project would be constructed over approximately 12 months, starting in the fourth quarter of 2016. Construction activities would include grading, excavation, and building construction. Grading, excavation, and site preparation activities would occur over approximately eight to ten weeks and building construction would occur over approximately 12 months. The Project would be ready for occupancy in fourth quarter of 2018.

Approximately 3,650 cubic yards of soil would be imported to the Project Site. The likely haul route would be Panama Street, Alla Road, and Culver Boulevard to the Marina Freeway.

Construction workers would be on-site before 7:00 AM and would typically leave the Project Site prior to 5:00 PM. These workers typically arrive and depart outside of the commuter peak hours, thereby minimizing the effect of construction worker traffic. During construction, there would be far fewer daily and peak hour trips than the Project trip generation estimates. As discussed below, traffic impacts during operation would be less than significant. Therefore, the construction process would not result in significant traffic impacts to study intersections.

The Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by the local agency prior to the issuance of any construction permits. A Work Area Traffic Control Plan would be developed for use during the entire construction period. This plan would also incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor

through the duration of demolition and construction activity. Construction equipment and worker cars would generally be contained on-site. At times when on-site staging and parking is not available, a secondary staging area would be required. The Work Area Traffic Control Plan would minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians. It is necessary to develop and implement an approved Work Area Traffic Control plan including a designated haul route, staging area, and traffic control procedures to mitigate the traffic impacts during construction. The mitigation measures listed below includes access restrictions, covered sidewalks, and designating alternative pedestrian routes. With the mitigation measures, traffic impacts during construction would be less than significant.

Mitigation Measures

The following mitigation measures would reduce traffic impacts during construction to a less-than-significant level.

MM 16-1 A construction work site traffic control plan shall be submitted to DOT's Central District Office for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.

The review and approval of the site plan for driveway dimension, access and circulation scheme, shall be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, @ 213-482-7024) to avoid delays in the building permit approval process.

All driveways shall be Case 2 driveways and 30 feet for two-way operations and 16 feet wide for one-way operations.

All pick-up and drop-off activities shall take place on-site.

MM 16-2 Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic, and overhead protection, due to sidewalk closure.

Temporary pedestrian facilities should be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

Covered walkways should be provided where pedestrians are exposed to potential injury from falling objects.

MM 16-3 Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

MM 16-4 The following conditions are recommended by LADOT:

Covenant and Agreement. Pursuant to Section 5.B of the CTCSP, the owner(s) of the property must sign and record a Covenant and Agreement prior to issuance of any building permit, acknowledging the contents and limitations of this Specific Plan in a form designed to run with the land.

Transportation Impact Assessment (TIA) Fee. Pursuant to Section 6 of the CTCSP, an applicant for a project within the Specific Plan area, except as exempted, shall pay, or guarantee payment of, a TIA Fee prior to issuance of any building permit. In accordance with this directive, the project shall remit payment of the applicable TIA fee amount prior to issuance of any building permit.

Transportation Demand Management (TDM). Pursuant to Section 5G of the CTCSP, the applicant shall submit a Transportation Demand Management (TDM) Program Plan to DOT for review and approval. The project must also comply with Section 12.26.J (Ordinance No. 168,700) of the Los Angeles Municipal Code which requires specific TDM and trip reduction measures. To the extent possible, the TDM plan should include opportunities for coordination with area adjacent Transportation Management Organizations (TMO's) including Playa Vista and the Howard Hughes Center.

Highway Dedication and Physical Street Improvements. Pursuant to Section 5.D.2 of the CTCSP, the applicant may be required to make highway dedications and improvements.

1. Alla Road is designated as a Local Standard, along the project frontage, in the newly adopted Mobility Element of the City's General Plan. Street Standard Plan S-470-1 dictates that the Local Standard Street cross-section should consist of a 36-foot roadway width within a 60- foot right-of-way or an 18-foot half roadway width within a 30-foot half right-of-way. Alla Road currently provides an 83-foot right-of-way along the project and appears to currently consist of a 15-foot half roadway width within a 22-foot half right-of-way. Therefore, a final determination regarding the appropriated dedication and widening needed, per the defined street standards, is required.

2. Panama Street is designated as a Standard Local street in the newly adopted Mobility Element of the City's General Plan. Street Standard Plan S-470-1 dictates that the crosssection for a Standard Local Street is a 36-foot roadway width within a 60-foot right-of-way or an 18-foot half roadway width within a 30-foot half right-of-way width. The current rightof- way width along Panama Street appears to be 60-feet with a variable width roadway therefore, a final determination regarding the appropriated dedication and widening needed, per the defined street standards, is required.

3. The project Marina Expressway frontage is under the jurisdiction of Caltrans. The project shall be responsible for consulting with the Caltrans District 7 office to determine any possible dedication or improvement requirements for this frontage of the project.

All un-improved sidewalk area surrounding the project site shall be improved by the project. The applicant should check with the Bureau of Engineering's (BOE) Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project. These requirements must be guaranteed before issuance of any building permit through the B-permit process of the Bureau of Engineering, Department of Public Works. They must be constructed prior to issuance of any certificate of occupancy to the satisfaction of DOT and the Bureau of Engineering.

Parking Requirements. The project is proposing to provide 627 parking spaces, 59 spaces are proposed as surface parking and the remaining 568 spaces will be provided in a 4-level above-grade parking structure. The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for the project.

Construction Impacts. DOT recommends that a construction work site traffic control plan be submitted to DOT's Western District Office for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours.

Site Access and Internal Circulation. This determination does not include approval of the driveways, internal circulation and parking scheme. Adverse traffic impacts could occur due to access and circulation issues. The applicant is advised to consult with DOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site/driveway plans, at a scale of at least 1" = 40', separately to DOT's WLA/Coastal Development Review Section at 7166 West Manchester Avenue, Los Angeles 90045 as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety. In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts, for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. New driveway should be Case 2 driveways and 30 feet and 16 feet width for two-way and one-way operations, respectively.

Development Review Fees. An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT to permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

MM 6-5 The following conditions are recommended by the City to minimize construction impacts:

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- The applicant shall be limited to no more than two trucks at any given time within the site's staging area.
- There shall be no staging of hauling trucks on any streets adjacent to the project, unless specifically approved as a condition of an approved haul route.
- No hauling shall be done before 9 a.m. or after 3 p.m.
- Trucks shall be spaced so as to discourage a convoy effect.
- On substandard hillside streets, only one hauling truck shall be allowed on the street at any time.
- A minimum of two flag persons are required. One flag person is required at the entrance to the project site and one flag person at the next intersection along the haul route.
- Truck crossing signs are required within 300 feet of the exit of the project site in each direction.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times shall provide reasonable control of dust caused by wind.
- Loads shall be secured by trimming and watering or may be covered to prevent the spilling or blowing of the earth material.
- Trucks and loads are to be cleaned at the export site to prevent blowing dirt and spilling of loose earth.
- No person shall perform grading within areas designated "hillside" unless a copy of the permit is in the possession of a responsible person and available at the site for display upon request.
- A log documenting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times.
- The applicant shall identify a construction manager and provide a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.

Operational Traffic Impacts

The Traffic Report was prepared using procedures adopted by the LADOT to evaluate the potential traffic impacts of the Project. The traffic impact of a project is determined by comparing the changes in the traffic conditions at selected study intersections. The amount of new traffic added to an intersection by the project determines the traffic impact.

Traffic Scenarios

The traffic analysis assumes that the Project would be completed by year 2018 and is directed at analyzing the potential project generated traffic impact on the local street system for existing and future year traffic conditions. The following traffic scenarios have been developed and analyzed as part of this study:

- Existing Conditions – The analysis of existing traffic conditions is intended to provide a basis for the remainder of the study. The existing conditions analysis includes a description of the transportation system serving the Project Site, existing traffic volumes, and an assessment of the operating conditions at the study analysis locations described below.
- Existing plus Project Conditions – This traffic scenario provides projected traffic volumes and an assessment of operating conditions under existing conditions with the addition of project - generated traffic. The impacts of the Project on existing traffic operating conditions were then identified.
- Future Base (Year 2018) Conditions – Future traffic projections without the proposed Project were developed for the year 2018. The objective of this analysis was to project future traffic growth and operating conditions that could be expected to result from regional growth and related projects in the vicinity of the Project Site by the year 2018.
- Future (Year 2018) plus Project Conditions – This traffic scenario provides projected traffic volumes and an assessment of operating conditions under future conditions with the addition of project-generated traffic. The impacts of the Project on future traffic operating conditions were then identified.

Study Analysis Locations

Provided below is a list of intersections and street segment studied, as illustrated in Figure IV-5, Project Site and Analyzed Locations. These locations were identified in conjunction with the City of Los Angeles. Thirteen signalized intersections and one street segment were analyzed for potential project impacts.

Signalized Intersections Analyzed for Level of Service Impacts

1. Culver Boulevard & Marina Freeway Westbound Off-Ramp
2. Alla Road & Marina Freeway
3. Mindanao Way & Marina Freeway Westbound Expressway
4. Mindanao Way & Marina Freeway Eastbound Expressway
5. Lincoln Boulevard & Marina Freeway
6. Culver Boulevard & Marina Freeway Eastbound On-Ramp
7. Culver Boulevard & Centinela Avenue
8. Lincoln Boulevard & Maxella Avenue
9. Culver Boulevard & McConnell Avenue

10. Culver Boulevard & Braddock Drive
11. Lincoln Boulevard & Jefferson Boulevard
12. Culver Boulevard & Inglewood Boulevard
13. Culver Boulevard & Jefferson Boulevard

Street Segment Analyzed for Neighborhood Street Impacts

1. Panama Street east of Alla Road (east of the proposed Project Driveway)

Freeway Analysis

The "Agreement between City of Los Angeles and Caltrans District 7 On Freeway Impact Analysis Procedures" (October 2013 and amended on November 15, 2015), sets forth criteria for when a freeway impact analysis should be conducted. LADOT determined as part of the Traffic Study Memorandum of Understanding for the Project that the Project would not meet the criteria requiring a freeway impact analysis. Accordingly, no further analysis under the City's agreement with the Department of Transportation was required.

Existing Conditions

A comprehensive data collection effort was undertaken to develop a detailed description of existing transportation conditions in the study area. The assessment of conditions relevant to this study includes a description of the study area, an inventory of the local street system in the vicinity of the Project Site, a review of traffic volumes on these facilities, an assessment of the resulting operating conditions, and the current transit service in the study area.

Existing Traffic Volumes and Level of Service

Existing Base Traffic Volumes

Weekday AM and PM peak hour turning movement counts were collected at the study intersections in April, May, and November 2015. Traffic count data from intersections and street segments are contained in Appendix B to the Traffic Report (found in Appendix L to this Initial Study). Existing weekday morning and afternoon peak hour volumes at the study intersections are provided in Appendix C-1 to the Traffic Report (found in Appendix L to this Initial Study).

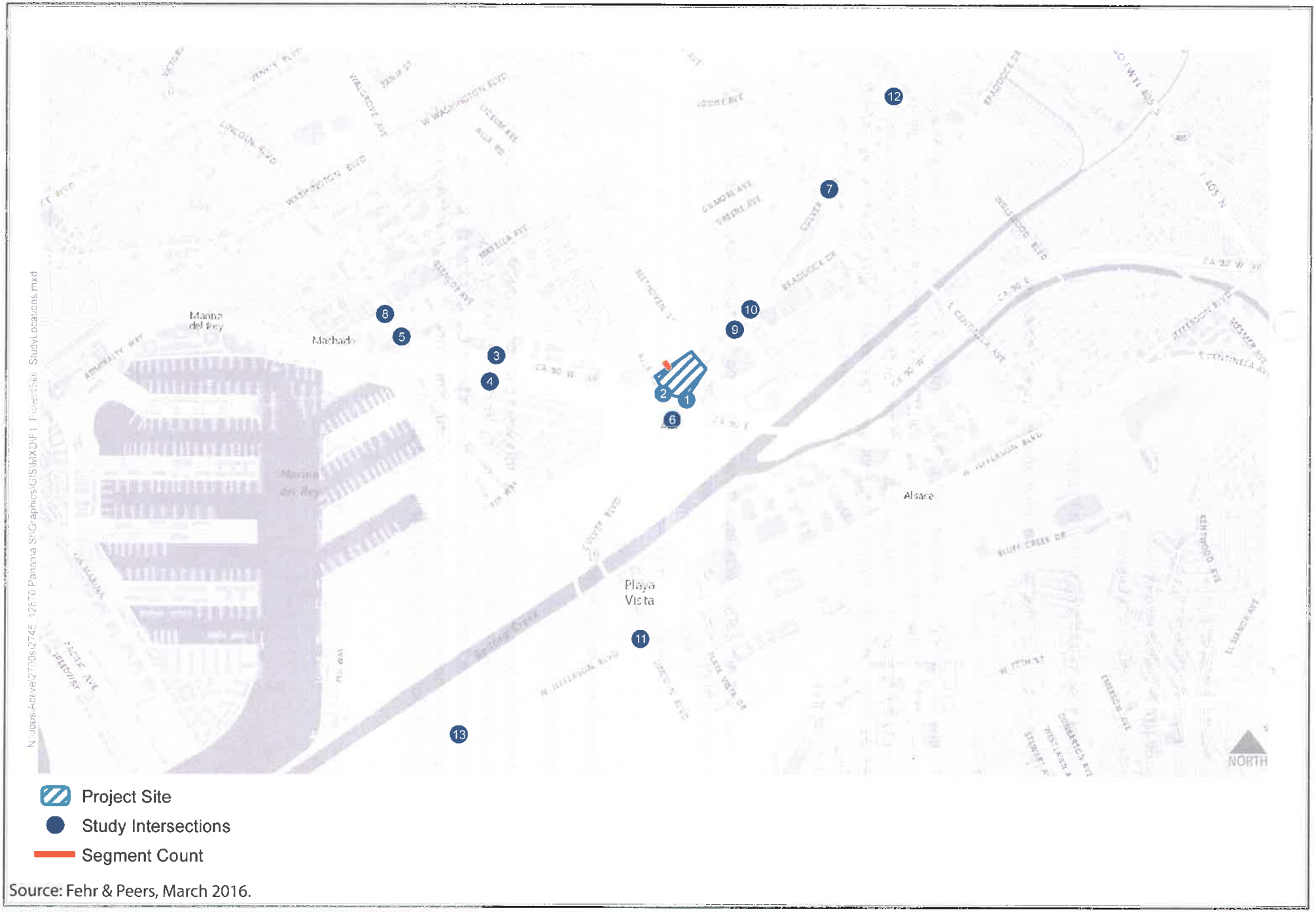

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Figure IV-5
Project Site and Analyzed Locations

Level of Service Methodology

According to *Traffic Study Policies and Procedures* (LADOT, 2014), this analysis is required to use the Critical Movement Analysis (CMA) method of intersection capacity calculation (Transportation Research Board, 1980) to analyze signalized intersections. The CMA methodology determines the intersection V/C ratio. The V/C ratio is then used to find the corresponding LOS based on the definitions in Table IV-24, Level of Service (LOS) Definitions for Signalized Intersections. Under the CMA methodology, a V/C ratio is generated for each study intersection based on factors such as the volume of traffic and the number of lanes providing for vehicle movement. LOS worksheets are included in Appendix D to the Traffic Report (found in Appendix L to this Initial Study).

Existing Levels of Service

Existing year traffic volumes presented in Appendix C-1 to the Traffic Report (found in Appendix L to this Initial Study) were analyzed using the CMA methodology described above to determine the existing operating conditions at the 13 signalized study intersections. Table IV-25, Existing Conditions Intersection Level of Service Analysis, summarizes the results of the analysis of the existing weekday morning and afternoon peak hour V/C ratio or average delay and corresponding LOS at each of the analyzed signalized intersections. As indicated, 12 of the 13 signalized intersections operate at LOS D or better during one or both peak periods. The intersection at Culver Boulevard & Centinela Avenue operates at LOS E during the PM peak period.

Table IV-24
Level of Service (LOS) Definitions for Signalized Intersections

Level of Service	Definition	Intersection Capacity Utilization
A	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.	0.000-0.600
B	Very GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	0.601 – 0.700
C	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.	0.701 – 0.800
D	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	0.801 – 0.900
E	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	0.901 – 1.000
F	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	> 1.000

Source: Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Board, 1980.

Table IV-25
Existing Conditions Intersection Level of Service Analysis

ID	North/South Street Name	East/West Street Name	Analyzed Periods	Existing[a]	
				V/C	LOS
1	Culver Boulevard	Marina Freeway WB Off Ramp	A.M	0.690	B
			P.M.	0.747	C
2	Alla Road	Marina Freeway	A.M	0.449	A

Table IV-25
Existing Conditions Intersection Level of Service Analysis

ID	North/South Street Name	East/West Street Name	Analyzed Periods	Existing[a] V/C	Existing[a] LOS
			P.M.	0.208	A
3	Mindanao Way	Marina WB Expressway	A.M.	0.515	A
			P.M.	0.569	A
4	Mindanao Way	Marina EB Expressway	A.M.	0.765	C
			P.M.	0.851	D
5	Lincoln Boulevard	Marina Freeway	A.M.	0.629	B
			P.M.	0.647	B
6	Culver Boulevard	Marina Freeway EB On Ramp	A.M.	0.446	A
			P.M.	0.474	A
7	Culver Boulevard	Centinela Avenue	A.M.	0.867	D
			P.M.	0.979	E
8	Lincoln Boulevard	Maxella Avenue	A.M.	0.608	B
			P.M.	0694	B
9	Culver Boulevard	McConnell Avenue	A.M.	0.527	A
			P.M.	0.375	A
10	Culver Boulevard	Braddock Drive	A.M.	0.486	A
			P.M.	0.302	A
11	Lincoln Boulevard	Jefferson Boulevard	A.M.	0.744	C
			P.M.	0.711	C
12	Culver Boulevard	Inglewood Boulevard	A.M.	0.798	C
			P.M.	0.795	C
13	Culver Boulevard	Jefferson Boulevard	A.M.	0.727	C
			P.M.	0.810	D

[a] Note: Traffic counts conducted 4/8/2015 (#1 -7), 5/28/2015 (#8-11), 11/10/2015 (#12) and 4/21/2015 (#13).
Source: Fehr & Peers, April 2016.

Traffic Projections

Project Trip Generation

Trip generation rates from *Trip Generation, 9th Edition* (Institute of Transportation Engineers [ITE], 2012) were used to estimate the number of trips associated with the Project and are presented in Table IV-26, Project Trip Generation. The ITE trip generation rate for General Office Buildings (ITE Code 710) was used to estimate morning and evening peak hour trips generated by the Project. A 15% creative office flex hour credit was applied to the morning and evening peak hour trips while a 5% transit credit was applied to both daily and peak hour trips.

The reduction in trip generation attributable to flex hours accounts for the off-peak arrival and departure patterns of creative office employees. A lesser percentage of creative office employees are expected to travel during the typical morning and afternoon peak periods of 7:00 to 9:00 AM and 4:00 to 6:00 PM than for traditional offices.

The applied transit credit accounts for trips made to and from the project site using modes other than automobiles. These include trips via bus, bicycle, walk, and other alternative transportation modes.

Transit access is provided by three surrounding bus stop locations along the intersections of Culver Boulevard & McConnell Avenue, Culver Boulevard & Alla Road, and Alla Road & Panama Street and the Project Site is bounded by a number of bicycle and pedestrian facilities.

As shown in Table IV-26, Project Trip Generation, the Project is estimated to generate 777 net daily trips, including 81 trips (72 inbound/9 outbound) during the AM peak hour and 91 trips (20 inbound/71 outbound) during the PM peak hour.

Project Traffic Distribution

The geographic distribution of trips generated by the Project is dependent on characteristics of the street system serving the Project Site, the level of accessibility of routes to and from the Project Site, and the residential distribution of potential employees coming to and from the office facilities. The general distribution pattern was developed using a select zone analysis on the City of Los Angeles Travel Demand Model. The travel demand model data was reviewed and discussed with LADOT staff to determine project trip distribution, which is illustrated in Figure IV-6, Project Trip Distribution.

Project Traffic Assignment

Figure IV-7, Project Trip Distribution at Study Intersections, shows the assignment of the Project generated peak hour traffic volumes at the analyzed intersections during the AM and PM peak hours. The assignment of traffic volumes took into consideration the locations of the Project driveways on Panama Street and Alla Road.

Future Base Traffic Conditions

The traffic volumes projected for the future base scenario (2018) take into account the expected changes in traffic over existing conditions from two primary sources: ambient growth in the existing traffic volumes due to the effects of overall regional growth and development outside the study area, and traffic generated by specific development projects in, or in the vicinity of, the study area. The methods used to account for these factors are described below.

Background or Ambient Growth

Based on historic trends and at the direction of LADOT, it was established that an ambient growth factor of 1% per year should be applied to adjust the existing base year traffic volumes to reflect the effects of regional growth and development by the year 2018. This adjustment was applied to the existing traffic volume data (2015) to reflect the effect of ambient growth by the year 2018.

Cumulative Project Traffic Generation and Assignment

Future base traffic forecasts include the effects of specific projects, called related projects, expected to be implemented in the vicinity of the Project Site prior to the buildout date of the Project. The list of related projects was prepared based on data from LADOT. A total of 14 cumulative projects were identified in the study area; these projects are listed in Table IV-27, Cumulative Trip Generation. The locations of the 14 related projects are shown in Figure II-19 (Location of Related Projects) in Section II (Project Description) of this Initial Study.

Trip Generation

Trip generation estimates for the related projects were calculated using a combination of previous study findings, publicly available environmental documentation, and the trip generation rates contained in Trip Generation, 9th Edition.

Table IV-26
Project Trip Generation

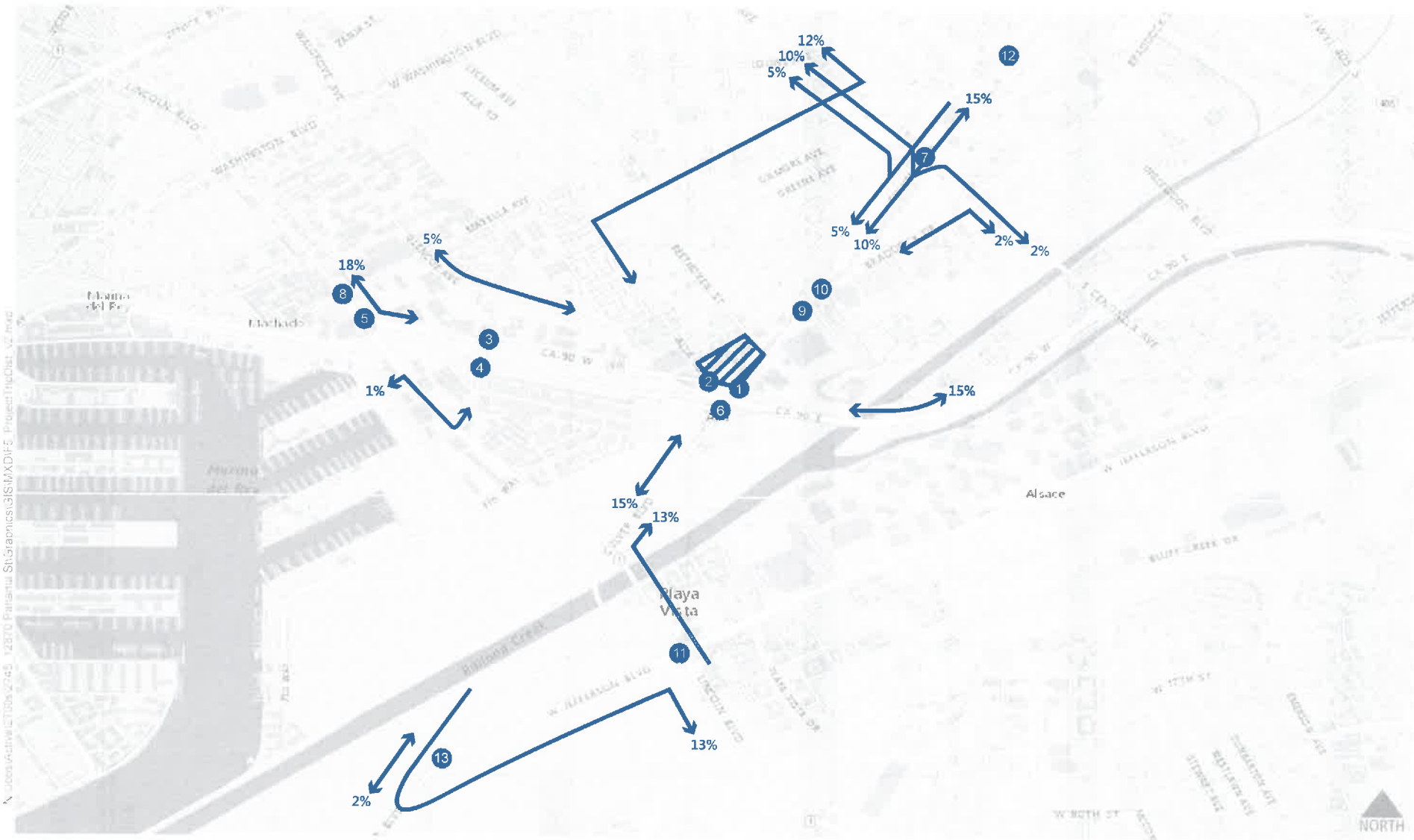
Land Use	ITE Code[a]	Trip Generation Rates: Daily Rate	AM Peak Hour Rate	AM In	AM Out	PM Peak Hour[c] Rate	PM In	PM Out	Estimated Trip Generation: Daily Trips	AM Peak Hour Trips In	AM Out	AM Total	PM Peak Hour Trips In	PM Out	PM Total
Project															
General Office Building	710	11.03	1.56	88%	12%	2.00	17%	83%	1,710	213	29	242	53	257	310
Internal Capture		0%	0%			0%			0	0	0	0	0	0	0
Creative Office flex hours[b]		0%	15%			15%			0	(32)	(4)	(36)	(8)	(39)	(47)
Transit Credit		5%	5%			5%			(86)	(9)	(1)	(10)	(2)	(11)	(13)
Net External Office									***1,624***	***172***	***24***	***196***	***43***	***207***	***250***
Project Total									**1,624**	**172**	**24**	**196**	**43**	**207**	**250**
Existing Use Credit															
General Office Building	710	11.03	1.56	88%	12%	2.80	17%	83%	357	45	6	51	15	76	91
Internal Capture		0%	0%			0%			0	0	0	0	0	0	0
Transit Credit		5%	5%			5%			(18)	(3)	0	(3)	(1)	(4)	(5)
Net External Office									339	42	6	48	14	72	86
Light Industrial	110	6.97	0.92	88%	12%	1.00	12%	88%	535	62	9	71	9	68	77
Internal Capture		0%	0%			0%			0	0	0	0	0	0	0
Transit Credit		5%	5%			5%			(27)	(4)	0	(4)	0	(4)	(4)
Net External Office									***508***	***58***	***9***	***67***	***9***	***64***	***73***
Net Incremental Trips									**777**	**72**	**9**	**81**	**20**	**71**	**91**

[a] *Institute of Transportation Engineers (ITE), Trip Generation, 9th Edition , 2012.*
[b] *The reduction in trip generation attributable to flex hours accounts for the off-peak arrival and departure patterns of creative office employees.*
[b] *Trip generation rates obtained from Costal Transportation Corridor Specific Plan - Appendix A Trip Generation Table (September 22, 1993).*

Source: Fehr & Peers, April 2016.

Trip Distribution

The geographic distribution of the traffic generated by the related projects is dependent on several factors. These factors include the type and density of the proposed land uses, the geographic distribution of population from which employees and potential patrons of proposed commercial developments may be drawn, the locations of employment and commercial centers to which residents of residential projects may be drawn, and the location of the projects in relation to the surrounding street system.



Source: Fehr & Peers, March 2016.

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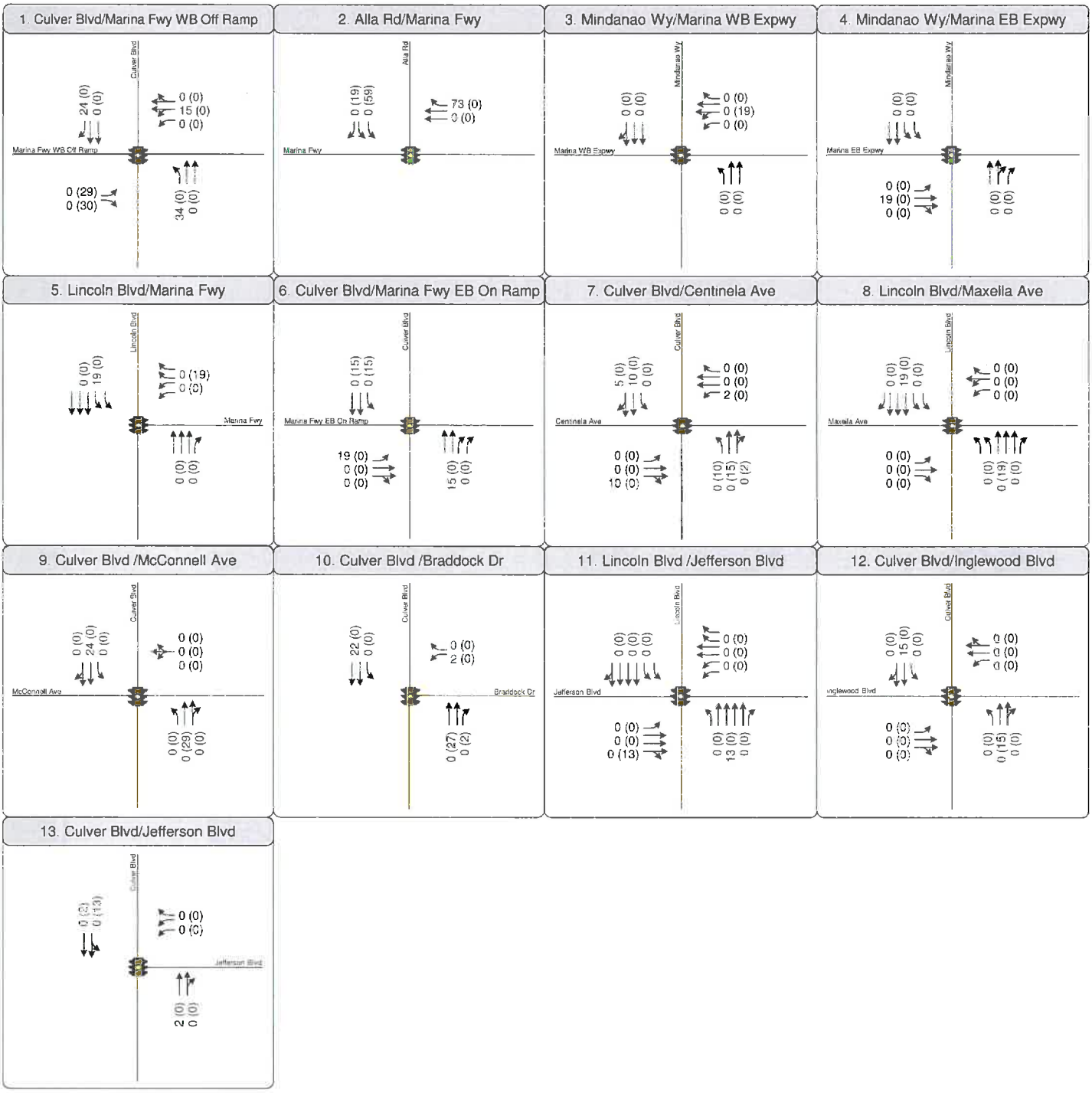
Figure IV-6
Project Trip Distribution



Inbound % (Outbound %)

Source: Fehr & Peers, March 2016.

Traffic Assignment

Using the estimated trip generation and trip distribution patterns described above, traffic generated by the related projects was assigned to the street network.

Cumulative Base Traffic Volumes

Appendix C-3 to the Traffic Report (found in Appendix L to this Initial Study) illustrates the future base year 2018 weekday AM and PM peak hour traffic volumes for the analyzed intersections. The future base traffic conditions represent an estimate of future conditions without the Project.

Table IV-27
Cumulative Trip Generation

ID	Land Use	Daily Traffic	Trip Generation Estimates					
			AM Peak Hour			PM Peak Hour		
			In	Out	Net	In	Out	Net
1	7,800 enrollment	2,540	146	30	176	112	111	223
2	67 du 3,211 sf office	481	11	28	39	33	23	56
3	51 du	339	5	21	26	23	13	36
4	136 du 20,000 sf office	627	24	47	71	48	37	85
5	67 du 7,525 sf office	391	4	21	25	29	22	51
6	49,950 sf office	550	68	9	77	17	83	100
7	168 du 100,000 sf mini-warehouse or 33,000 sf office	1,839	-50	139	88	149	-28	121
8	80 du 15,100 sf retail	1,543	28	42	70	80	41	141
9	46,000 sf Urban Ecology Center 600 acre ecological reserve	1,530	38	4	42	57	147	204
10	3,246 du 1,570,000 sf office 25,000 sf retail 65,000 sf community serving uses	28,257	2,464	1,328	3,792	1,541	2,462	4,003
11	1,129,900 sf of production and staging support	N/A	1,456	198	1,654	259	1,267	1,526
12	2,600 du 17,500 sf office 15,000 sf retail 40,000 sf commercial	24,220	577	1,049	1,626	1,275	1,027	2,302
13	Development contained within the Local Coastal Plan	34,098	622	1,085	1,707	1,378	1,125	2,503
14	158 du	1,067	14	59	73	81	46	127
	Total	N/A	**5,407**	**4,060**	**9,466**	**5,082**	**6,376**	**11,478**

Note: sf = square feet

Source: Fehr & Peers, April 2016.

Future Plus Project Traffic Projections

The Project traffic volumes were added to the year 2018 future base traffic projections, resulting in future plus project morning and evening peak hour traffic volumes. Illustrated in Appendix C-4 to the Traffic Report (found in Appendix L to this Initial Study), the future plus project scenario presents future traffic conditions with the completion of the Project.

Existing Plus Project Impact Analysis

Existing Plus Project Traffic Level of Service

Existing plus Project traffic volumes, presented in Appendix C-2 to the Traffic Report (found in Appendix L to this Initial Study), were analyzed to determine the projected V/C ratios and LOS for each intersection. Table IV-28, Existing Plus Project Intersection Level of Service Analysis, summarizes the existing plus project LOS. Three of the 13 analyzed intersections are projected to operate at LOS D or E during one or both peak periods under existing plus project conditions:

4. Mindanao Way & Marina Freeway Eastbound Expressway
7. Culver Boulevard & Centinela Avenue
13. Culver Boulevard & Jefferson Boulevard

Existing Plus Project Intersection Impacts

As shown in Table IV-28, Existing Plus Project Intersection Level of Service Analysis, after applying the aforementioned City of Los Angeles significant impact criteria, it is determined that the Project would not significantly impact traffic at the study intersection locations.

Future Plus Project Impact Analysis

Future Base Traffic Conditions

The year 2018 future base peak hour traffic volumes, illustrated in Appendix C-3 to the Traffic Report (found in Appendix L to this Initial Study), were analyzed to determine the projected V/C ratio and LOS for each of the analyzed intersections. Table IV-6, Future Conditions Intersection Level of Service Analysis, summarizes the future LOS.

The following six intersections are projected to operate at LOS D or worse during one or both of the peak hours under future base conditions:

4. Mindanao Way & Marina Freeway Eastbound Expressway
7. Culver Boulevard & Centinela Avenue
8. Lincoln Boulevard & Maxella Avenue
11. Lincoln Boulevard & Jefferson Boulevard
12. Culver Boulevard & Inglewood Boulevard
13. Culver Boulevard & Jefferson Boulevard

Table IV-28
Existing Plus Project Intersection Level of Service Analysis

No.	N/S Street Name	E/W Street Name	Peak Hour	Existing		Existing Plus Project		Project Increase In V/C	Significant Impact
				V/C	LOS	V/C	LOS		
1.	Culver Blvd	Marina Fwy WB Off Ramp	AM	0.690	B	0.727	C	0.037	NO
			PM	0.747	C	0.764	C	0.017	NO
2.	Alla Rd	Marina Fwy	AM	0.449	A	0.485	A	0.036	NO
			PM	0.208	A	0.223	A	0.015	NO
3.	Mindanao Wy	Marina WB Expwy	AM	0.515	A	0.515	A	0.000	NO
			PM	0.569	A	0.572	A	0.003	NO
4.	Mindanao Wy	Marina EB Expwy	AM	0.765	C	0.769	C	0.004	NO
			PM	0.851	D	0.852	D	0.001	NO
5.	Lincoln Blvd	Marina Fwy	AM	0.629	B	0.634	B	0.005	NO
			PM	0.647	B	0.648	B	0.001	NO
6.	Culver Blvd	Marina Fwy EB Off Ramp	AM	0.446	A	0.460	A	0.014	NO
			PM	0.474	A	0.481	A	0.007	NO
7.	Culver Blvd	Centinela Ave	AM	0.867	D	0.872	D	0.005	NO
			PM	0.979	E	0.987	E	0.008	NO
8.	Lincoln Blvd	Maxella Ave	AM	0.608	B	0.609	B	0.001	NO
			PM	0.694	B	0.695	B	0.001	NO
9.	Culver Blvd	McConnell Ave	AM	0.527	A	0.529	A	0.002	NO
			PM	0.375	A	0.377	A	0.002	NO
10.	Culver Blvd	Braddock Dr	AM	0.486	A	0.487	A	0.001	NO
			PM	0.302	A	0.303	A	0.001	NO
11.	Lincoln Blvd	Jefferson Blvd	AM	0.744	C	0.745	C	0.001	NO
			PM	0.711	C	0.711	C	0.000	NO
12.	Culver Blvd	Inglewood Blvd	AM	0.798	C	0.799	C	0.001	NO
			PM	0.795	C	0.797	C	0.002	NO
13.	Culver Blvd	Jefferson Blvd	AM	0.727	C	0.728	C	0.001	NO
			PM	0.810	D	0.822	D	0.012	NO

Source: Fehr & Peers, April 2016.

Future Plus Project Traffic Conditions

The resulting future plus project peak hour traffic volumes, illustrated in Appendix C-4, to the Traffic Report (found in Appendix L to this Initial Study), were analyzed to determine the projected future operating conditions with the addition of the Project traffic. The results of the future plus project analysis are presented in Table 7, Future Conditions Intersection Level of Service Analysis. The following six intersections are projected to operate at LOS D or worse during one or both of the peak hours:

4. Mindanao Way & Marina Freeway Eastbound Expressway
7. Culver Boulevard & Centinela Avenue
8. Lincoln Boulevard & Maxella Avenue
11. Lincoln Boulevard & Jefferson Boulevard
12. Culver Boulevard & Inglewood Boulevard
13. Culver Boulevard & Jefferson Boulevard

Future Plus Project Intersection Impacts

As shown in Table IV-29, Future Conditions Intersection Level of Service Analysis, after applying the aforementioned City of Los Angeles significant impact criteria, it is determined that the Project would not significantly impact future traffic conditions at the study intersection locations.

Table IV-29
Future Conditions Intersection Level of Service Analysis

No.	N/S Street Name	E/W Street Name	Peak Hour	Future		Future Plus Project		Project Increase In V/C	Significant Impact
				V/C	LOS	V/C	LOS		
1.	Culver Blvd	Marina Fwy WB Off Ramp	AM	0.720	C	0.758	C	0.038	NO
			PM	0.795	C	0.812	D	0.017	NO
2.	Alla Rd	Marina Fwy	AM	0.466	A	0.501	A	0.035	NO
			PM	0.231	A	0.247	A	0.016	NO
3.	Mindanao Wy	Marina WB Expwy	AM	0.541	A	0.542	A	0.001	NO
			PM	0.626	B	0.628	B	0.002	NO
4.	Mindanao Wy	Marina EB Expwy	AM	0.810	D	0.815	D	0.005	NO
			PM	0.920	E	0.922	E	0.002	NO
5.	Lincoln Blvd	Marina Fwy	AM	0.718	C	0.724	C	0.006	NO
			PM	0.798	C	0.800	C	0.002	NO
6.	Culver Blvd	Marina Fwy EB Off Ramp	AM	0.464	A	0.478	A	0.014	NO
			PM	0.501	A	0.508	A	0.007	NO
7.	Culver Blvd	Centinela Ave	AM	0.936	E	0.941	E	0.005	NO
			PM	1.151	F	1.158	F	0.007	NO
8.	Lincoln Blvd	Maxella Ave	AM	0.710	C	0.711	C	0.001	NO
			PM	0.824	D	0.825	D	0.001	NO
9.	Culver Blvd	McConnell Ave	AM	0.547	A	0.548	A	0.001	NO
			PM	0.395	A	0.397	A	0.002	NO
10.	Culver Blvd	Braddock Dr	AM	0.504	A	0.505	A	0.001	NO
			PM	0.319	A	0.321	A	0.002	NO
11.	Lincoln Blvd	Jefferson Blvd	AM	0.973	E	0.975	E	0.002	NO
			PM	0.827	D	0.829	D	0.002	NO
12.	Culver Blvd	Inglewood Blvd	AM	0.851	D	0.851	D	0.000	NO
			PM	0.868	D	0.869	D	0.001	NO
13.	Culver Blvd	Jefferson Blvd	AM	0.783	C	0.783	C	0.000	NO
			PM	0.873	D	0.886	D	0.013	NO

Source: Fehr & Peers, April 2016.

Neighborhood Traffic Impact Analysis

The objective of the residential street analysis is to determine the potential for cut-through traffic impacts on a residential street that can result from a project. Cut-through trips are measured as vehicles that bypass a congested arterial or intersection by instead opting travel along a residential street. Since the Project has a driveway along Panama Street, project-related vehicles are expected to travel on Panama Street to access the driveway. The majority of these vehicles are expected to ingress/egress Panama Street from the west via Alla Road. However, a few vehicles could use Panama Street, east of the proposed driveway location.

A 24-hour machine count was conducted on the analyzed street segment in May 2015 during weekday conditions. Future daily traffic volumes were projected in a manner similar to the peak hour analysis of

the study intersections, including both ambient growth at 1% per year as well as anticipated traffic from cumulative projects that could be constructed by 2018. The net new Project trips were assigned to the street network based on the Project trip distribution pattern and were added to the future base projection to obtain future plus project projections.

Neighborhood Street Impacts

Under the City of Los Angeles guidelines, a project would be considered to significantly impact a local residential street if the projected increase in daily traffic volumes is as shown in Table IV-30, Daily Traffic Volume Impact Levels.

Table IV-30
Daily Traffic Volume Impact Levels

Projected Average Daily Traffic With Project (Final ADT)	Project-Related increase in ADT
0 to 999	120 or more
1,000 to 1,999	12% or more of final ADT
2,000 to 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT

Estimated daily traffic volumes for the existing and projected future conditions are summarized in Tables IV-31 and IV-32, respectively. As shown, the Project will not significantly impact traffic at the analyzed segments under Existing plus Project or Future plus Project conditions.

Table IV-31
Neighborhood Street Impact Analysis-Daily Traffic Volumes
Existing Conditions

Location	Weekday Bidirectional Daily Volume			Impact Analysis		
	Existing ADT	Project Only	Existing Plus Project	% of Final ADT	Significance Threshold	Significant Impact?
Panama Street b/w Project Driveway & Beethoven St	655	59	714	-	120 Trips	No
Source: Fehr & Peers, April 2016.						

Table IV-32
Neighborhood Street Impact Analysis-Daily Traffic Volumes
Cumulative Conditions

Location	Weekday Bidirectional Daily Volume				Impact Analysis		
	Existing ADT	Cumulative ADT	Project Only	Cumulative Plus Project	% of Final ADT	Significance Threshold	Significant Impact?
Option 1 (Residential Only)							
Panama Street b/w Project Driveway & Beethoven St	655	675	59	734	-	120 Trips	No
Source: Fehr & Peers, April 2016.							

Therefore, it has been determined that the added traffic generated by the Project would not significantly impact any of the 13 study intersections using criteria established by the LADOT. Impacts during Project operation would be less than significant and no mitigation measures would be required.

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?

Less-Than-Significant Impact. The *Congestion Management Program* (CMP) was adopted to monitor regional traffic growth and related transportation improvements. The CMP designated a transportation network including all state highways and some arterials within the County to be monitored by of local jurisdictions. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the program. Local jurisdictions found to be in nonconformance with the CMP risk the loss of state gas tax funding.

For purposes of the CMP LOS analysis, an increase in the freeway volume by 150 vehicles per hour during the am or pm peak hours in any direction requires further analysis. A substantial change in freeway segments is defined as an increase or decrease of 2% in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the am or pm peak requires further analysis.

As previously discussed, LADOT determined as part of the Traffic Study Memorandum of Understanding for the Project, found in Appendix E, to the Traffic Report (Appendix L to this Initial Study), that the Project would not meet the criteria requiring a freeway impact analysis. Accordingly, no further analysis under the City's agreement with the Department of Transportation was required and no additional freeway or CMP analysis is necessary and no mitigation measures are required.

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. This question would apply to the Project only if it were an aviation-related use. The Project does not include any aviation-related uses would have no impact on any airport. It would also not require any modification to flight paths for the existing airports in the Los Angeles Basin. Therefore, no impact would occur and no mitigation measures are required.

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. For the purpose of this Initial Study, a significant impact may occur if a project included new roadway design or introduced a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

Vehicular access to the Project Site would be provided along two streets: Panama Street and Alla Road. Panama Street driveway is proposed to be located between Alla Road and Beethoven Street, along the northwest corner of the Project Site. The driveway will provide full vehicular access.

The Alla Road driveway is proposed to be located along the small segment of Alla Road between Marina Freeway (SR-90) Westbound Off-Ramp and Panama Street. This driveway is proposed to provide full inbound access but limited to only right turns outbound because of its proximity to the intersection of Culver Boulevard & SR-90 Westbound Off-Ramp. Both driveways would be configured with one inbound and one outbound lane. Pedestrian and bicycle access to the site would also be provided via the two driveways. The Project is proposing to construct new sidewalks along the SR-90 Westbound Off-Ramp, Alla Road, and Panama Street. Additionally, the Project driveways would conform to City design

standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. Therefore, no safety access impacts would occur.

Furthermore, no hazardous design features or uses would be introduced with the Project that would create significant hazards to the surrounding roadways. Therefore, Project roadway improvements would not substantially increase hazards due to a design feature. Impacts would be less than significant and no mitigation measures are required.

e) Would the project result in inadequate emergency access?

No Impact. For the purpose of this Initial Study, a significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAPD or the LAFD, or threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The Project would provide adequate emergency access in conformance with City requirements. Furthermore, the Applicant would consult with the LAPD and LAFD prior to Project construction. Therefore, there would be no impact related to emergency access and no mitigation measures are required.

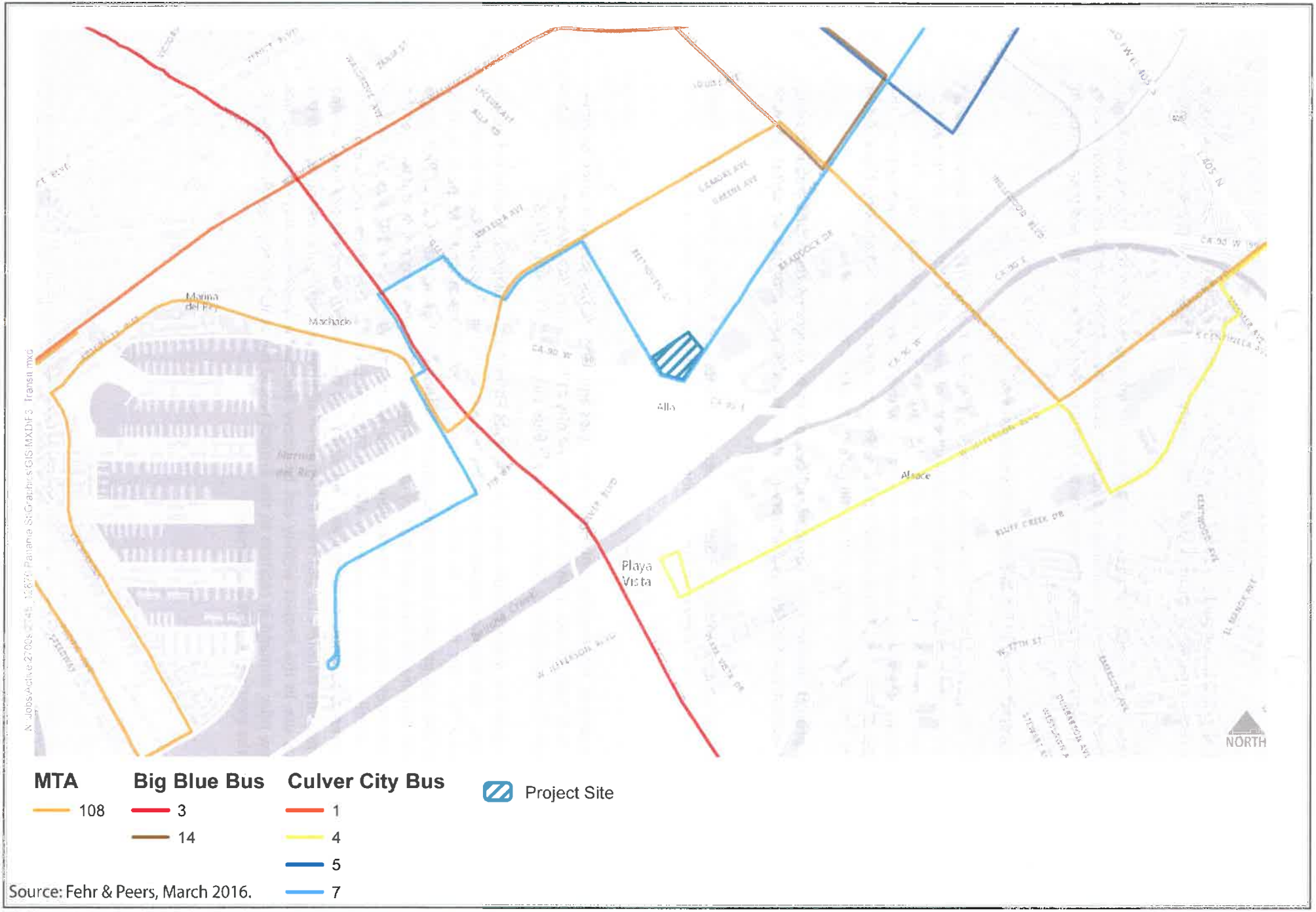
f) Would the project conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. For the purpose of this Initial Study, a significant impact may occur if the project would conflict with adopted polices or involve modification of existing alternative transportation facilities located on- or off-site.

Public Transit

The Project area, in general, is served by a number of bus lines and other public transportation facilities. As shown in Figure IV-8, Transit Lines, transit lines in the vicinity of the Project Site are served by the Los Angeles County Metro Transit Authority, Santa Monica Big Blue Bus, and the Culver City Bus.

The Culver City Bus Line 7 is a north-south line that connects Fisherman's Village in Marina Del Rey to Downtown Culver City. This line runs adjacent to the Project Site along Alla Road and Culver Boulevard. The average headway for this line is 30 minutes during the weekday AM and PM peak periods. Additionally, Metro Line 108 provides local service between Marina Del Rey and the City of Pico Rivera through Bell Gardens, Huntington Park, and the City of Los Angeles. This line runs north and west of the Project Site along Centinela Boulevard, Short Avenue, and Mindanao Way. Line 108 has an average headway of 8 to 15 minutes during the weekday AM and PM peak periods. Therefore, area-wide public transportation is currently available to employees and visitors of the Project, with the bus lines serving the Project vicinity provide transfers to and from a number of additional transit services throughout the area. Although bus use in the Project vicinity can be heavy during the peak commute periods, this nominal level of new rider demand in relation to the Project would not result in any significant transit-related impacts to the existing level of bus service.



Source: Fehr & Peers, March 2016.

EcoTierra consulting

Figure IV-8
Transit Lines

Bicycle Facilities

Figure IV-9, Bicycle Facilities, shows citywide designated bicycle facilities in the Project area. As shown, a network of bicycle lanes, and bicycle routes exist in the study area.

The bicycle lanes in the area include:

- Short Avenue
- Alla Road
- Braddock Drive

The bicycle paths in the area include:

- Culver Boulevard
- Ballona Creek Bike Path

The bicycle-friendly street in the study area is McConnell Avenue (sharrowed bike route).

Per City of Los Angeles Bicycle Parking requirements, the Project is require to provide one short-term bicycle parking space (minimum of two spaces) for every 10,000 square feet of building floor area and one long-term parking space (minimum of two spaces) for every 5,000 square feet of building floor area. For the proposed 155,000 square feet of creative office use, the Project is required to provide a total of 16 short-term and 31 long-term bicycle parking spaces. The Project proposes to meet the bicycle parking spaces and related amenities required by the bicycle parking code.

Pedestrian Facilities

Pedestrian facilities around the Project area include a mature network of sidewalks and crosswalks. Along the eastern edge of the Project side (Culver Boulevard), sidewalks are provided in each direction and are approximately 10 feet wide. Along the northern edge of the Project Site (Panama Street), sidewalks are located on the adjacent side of the street (away from the Project Site) and are approximately five feet wide. No sidewalks exist along the southern and western end of the Project Site.

Conclusion

The Project would not require the disruption of public transportation services or the alteration of public transportation routes. Since the Project would not modify or conflict with any alternative transportation policies, plans, or programs, it would have no impact on such programs. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the traffic analysis above. The cumulative impacts traffic study area is similar to the study area for the Project traffic analysis.

Bicycle Facilities

Bike Lane — Bike Path — Project Site

Sharrowed Bike Route

Source: Fehr & Peers, March 2016.

EcoTierra consulting

Figure IV-9
Bicycle Facilities

With respect to construction traffic, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. However, similar to the Project, the related projects would be required to submit formal construction staging and traffic control plans for review and approval by the City prior to the issuance of construction permits. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions through the duration of construction activities. Assuming that the related projects would comply with this requirement, similar to the Project, the cumulative construction traffic impact would be less than significant.

Existing traffic, related project traffic, Project traffic, and a one percent per year ambient growth factor were added together to estimate future cumulative traffic volumes. As shown in Table IV-29, Future Plus Project Intersection Level of Service Analysis, the future traffic volumes of the related projects and ambient growth would not result in significant impacts. Therefore, the cumulative traffic operational impact would be less than significant.

17. UTILITIES AND SERVICE SYSTEMS

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

Less-Than-Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency.

This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes a NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

The Los Angeles RWQCB enforces wastewater treatment and discharge requirements for properties in the project area. The Project would convey wastewater via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The capacity of the HTP is discussed in response to 17(b) below. The HTP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. As such, wastewater from the implementation of the Project would be treated according to the wastewater treatment requirements enforced by the Los Angeles RWQCB. Impacts would be less than significant and no mitigation measures are required.

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?

Less-Than-Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving a Project Site would be exceeded. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors:

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

Project Design Features

The Project would implement the following project design features (PDFs) in accordance with Resolution No. 015,222 to reduce water consumption:

PDF 17-1 The Applicant or its successor shall install new water meters as required.

PDF 17-2 The Project shall include water conservation features in accordance with Title 24 of the California Code of Regulations (CCR).

PDF 17-3 The Applicant or any applicable successor shall install plumbing and plumbing fixtures that meet the following requirements:

- Toilets. All toilets installed shall be high efficiency fixtures. The maximum flush volume for high efficiency toilets shall not exceed 1.1 gallons per flush (effective).
- Urinals. All urinals installed shall be, at a minimum, high efficiency fixtures. The maximum flush volume of high efficiency urinals shall not exceed 0.125 gpf. Waterless urinals shall be utilized wherever possible.

PDF 17-4 Faucets. All faucets in public restrooms must be self-closing. The flow rate for all indoor faucets shall be 2.2 gpm except as follows:

- The maximum flow rate for commercial use kitchen faucets shall be 1.8 gpm.

PDF 17-5 The Applicant shall not use single pass cooling systems. Single-pass cooling systems are strictly prohibited for use in devices, processes, or equipment installed in commercial, industrial, or multi-family residential buildings. This prohibition shall not apply to devices, processes, or equipment installed for health or safety purposes that cannot operate safely otherwise.

PDF 17-6 The Applicant or its successor shall use rotating sprinkler nozzles landscape irrigation with a maximum flow rate of 0.5 gpm;

PDF 17-7 The Applicant or its successor shall use drought tolerant and native plants for 30 percent of total landscaping.

PDF 17-8 The Applicant or its successor shall use drip/subsurface irrigation (Micro-Irrigation), weather-based irrigation controller, landscaping contouring to

minimize precipitation runoff, micro-spray, water-conserving turf (if applicable), and zoned irrigation.

Water Treatment Facilities and Existing Infrastructure

The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the Project Site. The LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved. The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.

As previously discussed in Section II (Project Description), the Project would involve the construction of 155,000 square feet of office land uses. Project water use has been calculated and is presented below in Table IV-33, Estimated Average Daily Water Consumption. As shown therein, the Project would consume a total of approximately 22,320 gallons per day (gpd) or 24.82 acre-feet of water per year. Consequently, implementation of the Project is not expected to measurably reduce the LAAFP's capacity; therefore, no new or expanded water treatment facilities would be required. The Project would be within the growth projections of the LADWP and it is, therefore, anticipated that the LADWP would be able to meet the Project's water treatment demand.

Table IV-33
Estimated Average Daily Water Consumption

Land Use	Size	Consumption Rate[a]	Total Consumption (gpd)
Office	155,000 sf	144 gpd/1,000 sf	22,320
Total Water Consumption			**22,320**

Notes: sf = square feet; gpd = gallons per day
[a] *Based on 120% of rates provided by Ali Poosti, Acting Division Manager, Wastewater Engineering Services Division, Los Angeles Bureau of Sanitation, in correspondence dated February 12, 2016 (provided in Appendix K).*
Source (table): EcoTierra Consulting, 2016.

In addition to supplying water for domestic uses, the LADWP also supplies water for fire protection services, in accordance with the Fire Code. As identified in Question 14(a) the LAFD requires a water flow of 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously with a residual water pressure of 20 PSI. The existing water lines that currently serve the Project Site would serve the proposed Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the applicant or the LADWP. To the extent such upgrades result in a temporary disruption in service, proper notification to LADWP customers would take place. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because:

(1) any disruption of service would be of a short-term nature,

(2) replacement of the water mains would be within public rights-of-way, and

(3) any foreseeable infrastructure improvements would be limited to the immediate project vicinity.

Therefore, potential impacts resulting from water infrastructure improvements, if any are required, would be less than significant and no mitigation measures are required.

Furthermore, compliance with the PDFs listed above, water conservation measures, and regulatory requirements such as Title 20 and 24 of the California Administrative Code, would reduce the projected water demand. Chapter XII of the LAMC comprises the City of Los Angeles Emergency Water Conservation Plan. The Emergency Water Conservation Plan stipulates conservation measures pertaining to water closets, showers, landscaping, maintenance activities, and other uses. At the state level, Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses public utilities and energy, and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use. Overall, the Project's water demand is expected to comprise a small percentage of LADWP's existing water supplies. All in all, the Project's water demand is expected to comprise a small percentage of LADWP's existing water supplies. Therefore, the impact would be less than significant and no mitigation measures are required.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if:

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

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. The existing Project Site has sewer connections to the City's sewer system. Sewage from the Project Site is conveyed via sewer infrastructure to the HTP. Since 1987, the HTP has had capacity for full secondary treatment. Currently, the plant treats an average daily flow of 362 mgd, and has capacity to treat 450 mgd. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.[70] Wastewater generation has been calculated and is presented below in Table IV-34, Estimated Average Daily Wastewater Generation.

The Project would generate approximately 18,600 gpd or 0.0019 mgd of wastewater. The addition of only 0.0019 mgd of wastewater to the HTP is an insignificant fraction of the remaining 88 mgd HTP

[70] *City of Los Angeles, Department of Public Works Bureau of Sanitation, Clean Water, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=zrgile1yz_4&_afrLoop=21264325157764455#!, accessed: April 14, 2016.*

capacity. Furthermore, the City has indicated that the HTP has adequate capacity to serve the Project.[71] As such, with respect to the capacities of wastewater treatment facilities, impacts would be less than significant and no mitigation measures are required.

Table IV-34
Estimated Average Daily Wastewater Generation

Land Use	Size	Generation Rate[a]	Total Generation (gpd)
Office	155,000 sf	120 gpd/1,000 sf	18,600
Total Wastewater Generation			**18,600**

Notes: gpd = gallons per day sf = square feet
[a] *Generation rates source: Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, City of Los Angeles Department of Public Works Bureau of Sanitation, February 12, 2016 (See Appendix K to this Initial Study).*

With respect to wastewater infrastructure, wastewater service is provided to the Project Site by existing sewer lines maintained by the Bureau of Sanitation. Sewer infrastructure in the vicinity of the Project Site includes existing 8-inch line in the Panama Street right-of-way, Panama Street, and Culver Boulevard. The 8-inch lines from Panama Street right-of-way and Panama Street run into a 21-inch line on Braddock Drive before discharging into a 24-inch line on Havelock Avenue. The 8-inch line from Culver Boulevard runs into a 24-inch line on Marina Freeway before discharging into a 30-inch line on McConnell Avenue.[72]

The current flow level (d/D) and the design capacities at d/D of 50 percent in the sewer system are shown in Table IV-35, Current Flow Level and Design Capacities.

Based on current gauging, the sewer mains serving the Project Site are all at or under 50 percent design capacity. The current flow beneath Panama Street cannot be determined at this time. However, the City has concluded that the Project is estimated to generate 18,600 gpd of wastewater, and the wastewater system would be able to accommodate the total flow from the Project.[73] As previously discussed, LADPW must determine if there is allotted sewer capacity available for the Project. If the LADPW determines that there is allotted sewer capacity available for the Project, then the Department of Building and Safety will accept the plans and specifications for plan check upon the payment of plan check fees. At the request of the Project Applicant, the Department of Building and Safety may accept the Project's plans and specifications for plan check even if the Project has been placed on the waiting list and a sewer permit has not yet been obtained from LADPW, with the understanding that the Project will not be able to connect to the City's wastewater system until capacity is available and a sewer permit issued. Therefore, wastewater capacity impacts would be less than significant.

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[71] *Written correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, City of Los Angeles Department of Public Works Bureau of Sanitation, February 12, 2016 (See Appendix K to this Initial Study).*

[72] *Ibid.*

[73] *Ibid.*

Table IV-35
Current Flow Level and Design Capacities

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50 % Design Capacity[a]
8	Panama Street	*	240,516 gpd
8	Panama Street	*	177,633 gpd
8	Culver Boulevard	35	240,516 gpd
21	Braddock Drive		1.5 mgd
24	Havelock Avenue		1.92 mgd
30	McConnell Avenue	35	2.75 mgd

Notes: gpd = gallons per day; mgd = million gallons per day
** = No gauging available.*

[c] *Design capacity includes an allowance for extraneous flows, which inevitably become a part of the total flow. These flows include groundwater infiltration through defective pipes and maintenance holes. It also includes rainfall-dependent infiltration/inflow flow through cross connections, faulty maintenance holes and submerged maintenance hole covers. Rainfall-dependent infiltration/inflow flows are accounted for by designing pipes to have a d/D ratio of 0.5 for peak dry weather flow.*

Source: Written correspondence from Ali Poosti, Acting Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, February 12, 2016 (See Appendix K to this Initial Study).

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?

No Impact. For the purpose of this Initial Study, a significant impact may occur if the volume of storm water runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new storm water drainage facilities.

As described in Question 9(c), the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Project Site is nearly entirely covered with impermeable surfaces. Runoff from the Project Site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity. Therefore, the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems. No impact would occur and no mitigation measures are required.

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

Less-Than-Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for a project;
- Whether sufficient capacity exists in the water infrastructure that would serve a project, taking into account the anticipated conditions at project buildout;

- The amount by which a project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. MWD uses a land use based planning tool that allocates projected demographic data from SCAG into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's 2012-2035 RTP/SCS. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. LADWP's 2010 Urban Water Management Plan (UWMP) projects a supply of 614,800 AF/Y in 2015 and of 710,800 AF/Y in 2035. With LADWP's current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2010 UWMP. Any shortfall in LADWP controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand. While there may be times in which severe water shortages require MWD to allocate its imported water in the future, LADWP's customers have shown that they can adapt and reduce consumption in those years. However, MWD's 2010 Regional UWMP currently shows that with its investments in storage, water transfers and improving the reliability of the Bay-Delta, water shortages are not expected to occur within the next 25 years.[74]

As shown in IV-33, Estimated Average Daily Water Consumption, above, the Project would consume approximately 22,320 gpd or 24.82 acre-feet of water per year. This amount represents approximately 0.0004 percent of available 2015 supply, and approximately 0.0003 percent of the projected 2035 supply. Thus, it is anticipated that the Project would not create any water system capacity issues, and there would be sufficient reliable water supplies available to meet Project demands. Therefore, the Project would have a less than significant impact related to water demand.

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?

Less-Than-Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if:

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

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[74] *City of Los Angeles Department of Water and Power, Urban Water Management Plan 2010, adopted May 3, 2011, p. 6, http://www.ladwp.com, accessed April 2016.*

As stated in Question 17(b), the sewage flow from operation of the Project would ultimately be conveyed to the HTP, which has sufficient capacity for the Project.[75] Therefore, impacts would be less than significant and no mitigation measures are required.

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

Less-Than-Significant Impact. For the purpose of this Initial Study, a significant impact may 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of a project, considering proposed design and operational features that could reduce typical waste generation rates;
- Need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and
- Whether a project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element or its updates, the Solid Waste Management Policy Plan, Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the Source Reduction and Recycling Element.

Project Design Feature

The Project would implement the following project design feature (PDF) to minimize the potential for impacts. The PDF would be incorporated into the Project and is considered a part of the Project for purposes of the impact analysis.

PDF 17-1 A private recycling waste hauler would be retained to haul recyclables from the Project Site to the facility of choice.

It is assumed that the Applicant would contract with a local commercial solid waste hauler following completion of the Project. As is typical for most solid waste haulers in the greater Los Angeles area, the hauler would most likely separate and recycle all reusable material collected from the Project Site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of landfills, depending on with whom the hauler has contracts. However, over 90 percent of the construction and commercial solid waste generated in the City is disposed of at the Sunshine Canyon Landfill. The capacity and estimated closure date for the landfill is included in Table IV-36, Sunshine Canyon Landfill Capacity and Intake.

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[75] *City of Los Angeles, Department of Public Works Bureau of Sanitation, Clean Water, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=zrgile1yz_4&_afrLoop=21264325157764455#!, accessed: April 13, 2016.*

Table IV-36
Sunshine Canyon Landfill Capacity and Intake

Landfill Facility	Permitted Daily Intake (tons per day)	2014 Average Daily Intake (tons per day)	Estimated Remaining Permitted Capacity (as of 12/31/2014) (million tons)
Sunshine Canyon	12,100	7,582	64.7

Source: County Department of Public Works, Countywide Integrated Waste Management Plan 2014 Annual Report.

Construction Solid Waste

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the Project is estimated to generate a total of approximately 312 tons of solid waste[76] over the entire construction period. The remaining daily intake of the Sunshine Canyon Landfill is 4,518 tons per day.[77] As such, Sunshine Canyon Landfill would have adequate capacity to accommodate the construction waste generated by the Project over its entire construction period.

This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. The construction waste would be delivered to City certified construction waste processors where it would be recycled as feasible. Moreover, the *Countywide Integrated Management Plan 2014 Annual Report* (the 2014 Annual Report) concludes that there is current capacity of 59.83 million tons available in the County for the disposal of inert waste.[78] Therefore, the Project-generated construction waste of 312 tons would represent a very small percentage of the inert waste disposal capacity in the region. This would be a less-than-significant impact, as the Project would not create a need for additional solid waste disposal facilities to adequately handle project construction-generated inert waste.

Operational Solid Waste

The Project would generate solid waste that is typical of office land uses and would be consistent with all federal, state, and local statutes and regulations regarding proper disposal. As shown in Table IV-37, Estimated Average Daily Solid Waste Generation, the Project would generate approximately 930 pounds of solid waste per day.

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[76] *A construction waste generation rate of 4.02 pounds per square foot was used. 155,000 square feet of construction multiplied by 4.02 pounds is 623,100 pounds (311.6 tons). Source: U.S. Environmental Protection Agency, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.*

[77] *As shown in Table IV-1, the permitted daily intake is 12,100 tons per day and the average daily intake is 7,582 tons per day. 12,100 – 7,582 = 4,518.*

[78] *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2014 Annual Report, December 2015, page 32.*

Table IV-37
Estimated Average Daily Solid Waste Generation

Land Use	Size	Generation Rate (ppd) [a]	Total Generation (ppd)
Office	155,000 sf	0.006/sf	930
		Total Solid Waste Generation	**930**

Notes: lbs = pounds; sf = square feet
[a] *Cal Recycle, website: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm, April 13, 2016.*
Source: EcoTierra Consulting, 2016.

All solid waste generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is estimated that the Project would divert 50 percent of its solid waste generated. The City does not collect recycled materials from commercial land uses; therefore, a private recycling waste hauler would be retained to haul recyclables from the Project Site to the facility of choice. As such, it is conservatively assumed that all 465 ppd of operational waste would be disposed of at regional landfills. The average daily intake of the Sunshine Canyon Landfill is approximately 7,582 tons and the permitted daily intake is 12,100 tons. The 465 ppd of Project's daily operational solid waste represents approximately 0.0038 percent of the remaining capacity of the Sunshine Canyon Landfill's daily intake. As such, the landfill would have adequate capacity to accommodate the daily operational waste generated by the Project. Therefore, a less-than-significant impact associated with operational solid waste would occur.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less-Than-Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste that is typical of a commercial/office project and would be consistent with all federal, state, and local statutes and regulations regarding proper disposal. Additionally, the amount of solid waste that would be generated by the Project would be further reduced through source reduction and recycling programs (as required by AB 939). The Project would not conflict with solid waste policies or objectives that are required by law, statute, or regulation. Therefore, the impact would be less than significant and no mitigation measures are required.

Cumulative Impacts

Water

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the water utilities analysis above, including water treatment facilities, infrastructure, and water supplies. The cumulative impacts water utilities study area is the LADWP service area.

Implementation of the Project in combination with the related projects, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in the adopted Urban Water Management Plan (UWMP). In

conjunction with The City of Los Angeles Water Supply Action Plan,[79] the UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2030 under wet and dry year scenarios. The Project would be consistent with the General Plan and, therefore, has been taken into account in the UWMP. It is unknown whether or not the related projects or other development in the LADWP service area has been taken into account in the UWMP. Nonetheless, it can be assumed that any related projects that are not included in the UWMP would be required to identify water supplies prior to project approval. Therefore, the cumulative impact would be less than significant.

With respect to water treatment facilities, the remaining daily capacity of the LAAFP is 150 mgd. Therefore, it is anticipated that the LAAFP would have adequate capacity to the additional water demanded by the Project and the related projects. A less-than-significant cumulative impact would occur.

With respect to water infrastructure, the potential need for the related projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, cumulative relationship between the development of the Project and the related projects. As discussed above, the Project would have a less-than-significant impact on water infrastructure. Any upgrades to the related projects' water infrastructure would be required to be implemented by the applicants those projects. Therefore, the cumulative impact would be less than significant.

Wastewater

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the wastewater analysis above, including wastewater treatment requirements, facilities, and capacities. The cumulative impacts wastewater study area is the HTP service area.

Implementation of the Project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. The HTP currently treats an average of 362 mgd, with a capacity to treat 450 mgd. The City has adopted an Integrated Resources Plan that shows that the HTP will be able to accommodate growth within its service area to the year 2030. For purposes of this cumulative impacts analysis, it is assumed that the Integrated Resources Plan takes into account all current and future projects, including the related projects within the HTP service area. Therefore, the cumulative impact on wastewater treatment facilities and capacities would be less than significant.

With respect to sewer lines, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there is little, if any, cumulative relationship between the development of the Project and the related projects. Similar to the Project, the City will require detailed gauging and evaluation of the related projects' wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the applicants of the related projects would be required, at their own cost, to build secondary sewer lines to a connection point in

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[79] *Los Angeles Department of Water and Power, Developing A Local Water Supply, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-inourcommunity/a-ioc-goinggreen/a-ioc-gg-developingalocalwatersupply?_afrWindowId=sl2t88mxt_30&_afrLoop=30303913862000&_afrWindowMode=0&_adf.ctrl-state=sl2t88mxt_33, accessed: April 2016.*

the sewer system with sufficient capacity, in accordance with standard City procedures. Therefore, the cumulative impact would be less than significant.

Solid Waste

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 14 related projects (see Section II.6 [Related Projects]) with respect to the topics listed in the solid waste analysis above, including landfill capacity and compliance with solid waste statutes and regulations. The cumulative impacts solid waste study area is the Sunshine Canyon Landfill service area.

Implementation of the Project in combination with the related projects and other projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. The construction timing of the related projects cannot be anticipated. It is reasonable to assume that few of the related projects would be constructed during the same time period as the Project. Therefore, it is unlikely that the construction of the Project, simultaneously with some of the related projects, would result in significant increase in the volume of construction-related solid waste. Therefore, the cumulative solid waste impact during construction would be less than significant.

With respect to operational solid waste, similar to the Project, the related projects would be required (by AB 939) to reduce the amount of solid waste generated through source reduction and recycling programs. With the mandatory reduction of solid waste, it is likely that the related projects would result in a significant impact on local landfills. Therefore, the cumulative operational solid waste impact would be less than significant.

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?

No Impact. For the purpose of this analysis, a significant impact could occur if a project would have an identified potentially significant impact for any of the above issues, as discussed in the preceding sections.

The Project is located in a populated developed area and would have no unmitigated significant impacts with respect to biological resources or cultural resources. The Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur and no mitigation measures are required.

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)?

Less-Than-Significant Impact. For the purpose of this analysis, a significant impact could occur if the Project, in conjunction with other projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As concluded throughout this Initial Study, the cumulative impact related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. No mitigation measures are required.

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

Less-Than-Significant Impact. For the purpose of this analysis, a significant impact may occur if the project has the potential to result in significant impacts, as discussed in the preceding sections. The analysis contained in this Initial Study concludes that the Project would result in less-than-significant impacts after implementation of mitigation measures. Therefore, this impact would be less than significant and no additional mitigation measures are required.

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VI. ACRONYMS & ABBREVIATIONS

AB	Assembly Bill
ACMs	Asbestos-containing materials
AQMP	Air Quality Management Plan
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance Control
Basin	South Coast Air Basin
BAU	Business-as-usual
BMPs	Best Management Practices
BTEX	Benzene, toluene, ethylbenzene, and xylenes
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Controls Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CCR	California Code of Regulations
CE	Commuter Express
CEQA	California Environmental Quality Act
CH_4	Methane
City	City of Los Angeles, California
CMA	Critical Movement Analysis
CMP	Los Angeles County Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalents
Community Plan	North Hollywood-Valley Village Community Plan

dBA	A-weighted decibels
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
EV	Electric vehicle
FAR	Floor Area Ratio
FTA	Federal Transit Administration
General Plan	City of Los Angeles General Plan
GHG(s)	Greenhouse gas(es)
gpd	Gallons per day
gpm	Gallons per minute
Green LA Plan	Green LA: An Action Plan to Lead the Nation in Fighting Global Warming
H_2O	Water vapor
HFCs	Hydrofluorocarbons
HTP	Hyperion Treatment Plant
HVAC	Heating, ventilation, and air conditioning
in/sec	Inches per second
ITE	Institute of Transportation Engineers
LAAFP	Los Angeles Aqueduct Filtration Plant
LACC	Los Angeles County Code
LADBS	City of Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAMC	City of Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAPL	City of Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	Lead-based paint

LED	Light-emitting diode
LID	Low Impact Development
LAUSD	Los Angeles Unified School District
lbs	Pounds
LCFS	Low Carbon Fuel Standards
LOS	Level of Service
LST	Localized Significance Threshold
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	Million gallons per day
MPOs	Metropolitan Planning Organizations
MRZ-2	Mineral Resource Zone 2
MS4	Municipal Separate Storm Sewer System
$MTCO_2e$	Metric tons of carbon dioxide equivalent
N_2O	Nitrous oxide
NO_2	Nitrogen dioxide
NO_x	Nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	Ozone
PCFs	Perfluorocarbons
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Particulate Matter
ppm	Parts per million
PPV	Peak particle velocity
PSI	Pounds per square inch
RCP	Regional Comprehensive Plan
REC	Recognized environmental condition
RMS	Root mean square
ROG	Reactive organic gases

ROWD	Report of Waste Discharge
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
Scoping Plan	California Air Resources Board's Assembly Bill 32 Scoping Plan
SCS	Sustainable Communities Strategy
sf	Square feet
SF_6	Sulfur hexafluoride
SO_X	Sulfur oxides
SRA	Source Receptor Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWRCB	State Water Resources Control Board
TPHg	Total petroleum hydrocarbons gasoline
USEPA	United States Environmental Protection Agency
UWMP	Urban Water Management Plan
V/C	Volume-to-capacity
VdB	Velocity in decibels
VMT	Vehicle miles traveled
VOC	Volatile organic compounds
WSO	Water Service Organization