



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT



City Planning Commission

Date: April 14, 2016
Time: After 8:30 A.M.
Place: Los Angeles City Hall
Board of Public Works Hearing Room
200 North Spring Street, Room 350
Los Angeles, CA 90012

Public Hearing: October 7, 2015
Appeal Status: The On-Menu Density Bonus is appealable to City Council only by and owner/tenant of a property abutting, across the street or alley from, or having a common corner with the subject site; the Site Plan Review and Director's Determination are appealable to City Council by any party; the Off-Menu Density Bonus is not further appealable.

Expiration Date: April 14, 2016

Multiple Approval: Yes

Case No.: CPC-2015-2209-DB-CDO-SPR
CEQA No.: ENV-2015-2210-MND
Incidental Cases: None
Related Cases: None
Council No.: 11 - Mike Bonin
Plan Area: Palms - Mar Vista - Del Rey
Specific Plan: West Los Angeles TIMP & West Pico Boulevard CDO
Certified NC: West Los Angeles
GPLU: General Commercial
Current Zone: [Q]C2-1VL-CDO
Applicant: South Gate Investors III, LLC
Representative: Jonathan Lonner, Burns & Bouchard, Inc.

PROJECT LOCATION: 11916-11936 West Pico Boulevard

PROPOSED PROJECT: The project involves the removal of the existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit residential building and the construction, use and maintenance of a five-story, 56-foot tall mixed-use building with 100 dwelling units (with nine (9) affordable (very-low income) units), 2,625 square feet of restaurant and retail uses, 124 parking spaces in three (3) subterranean levels of parking, and 122 bicycle parking spaces, totaling approximately 78,484 square feet of floor area.

REQUESTED ACTIONS: Pursuant to Section 12.36 of the Los Angeles Municipal Code (Multiple Approval Ordinance), the following requests are provided:

1. Pursuant to Section 12.22-A,25 of the Los Angeles Municipal Code (L.A.M.C.), a 35% Density Bonus (with a set aside of 11%, nine (9) units, for Very Low Income Households); a Density Bonus Parking Incentive (Parking Option 1) to allow one (1) parking space for the 0-1 bedroom units and two (2) parking spaces for the 2-3 bedroom units; and one (1) On-Menu Incentive and four (4) Off-Menu Waivers as follows:
 - a. Pursuant to Section 12.22-A,25(f)(5), an On-Menu Incentive to allow a building height of 56 feet in lieu of the otherwise permitted 45 feet on the portion of the building fronting Pico Boulevard;

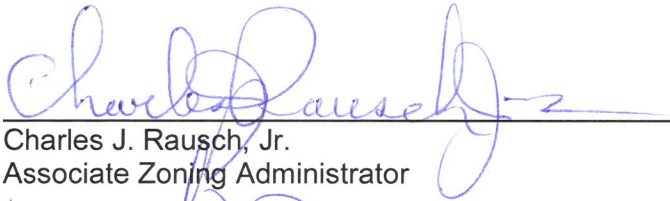
- b. Pursuant to Section 12.22-A,25(g)(3), an Off-Menu Waiver to allow Floor Area Ratio of 3 to 1, in lieu of the otherwise permitted 1.5 to 1;
 - c. Pursuant to Section 12.22-A,25(g)(3), an Off-Menu Waiver to waive transitional height limitations for the back portion of the building within 50-feet from the nearest R-1 zoned property;
 - d. Pursuant to Section 12.22-A,25(g)(3), an Off-Menu Waiver to allow five (5) stories in lieu of the permitted three (3) stories; and
 - e. Pursuant to Section 12.22-A,25(g)(3), an Off-Menu Waiver to allow a side yard setback of 2'0" in lieu of the otherwise required 8'0" adjacent to a "Pedestrian Walk Street";
2. Pursuant to Section 13.08-E of the L.A.M.C., a Director's Determination for the West Pico Boulevard Community Design Overlay Plan;
 3. Pursuant to Section 16.05 of the L.A.M.C., a Site Plan Review for a development project which creates or results in an increase of 50 or more dwelling units;
 4. Pursuant to Section 21082.1(c)(3) of the California Public Resources Code, adopt the Mitigated Negative Declaration (MND) for the above referenced project; and
 5. Pursuant to Section 21081.6 of the California Public Resources Code and Section 15097 of the CEQA Guidelines, adopt the Mitigation Monitoring Program for ENV-2015-2210-MND.

RECOMMENDED ACTIONS:

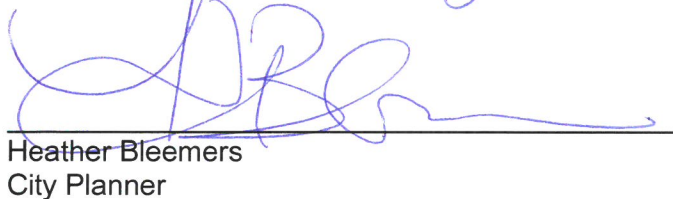
1. **Approve** a 35% Density Bonus (with a set aside of 10%, nine (9) units, for Very Low Income households); a Density Bonus Parking Incentive (Parking Option 1) to allow one (1) parking space for the 0-1 bedroom units and two (2) parking spaces for the 2-3 bedroom units; and one (1) On-Menu Incentive and four (4) Off-Menu Waivers as follows:
 - a. An On-Menu Incentive to allow a building height of 56 feet in lieu of the otherwise permitted 45 feet on the portion of the building fronting Pico Boulevard;
 - b. An Off-Menu Waiver to allow Floor Area Ratio of 3 to 1, in lieu of the otherwise permitted 1.5 to 1;
 - c. An Off-Menu Waiver to waive transitional height limitations for the back portion of the building within 50-feet from the nearest R-1 zoned property;
 - d. An Off-Menu Waiver to allow five (5) stories in lieu of the permitted three (3) stories; and
 - e. Pursuant to Section 12.22-A,25(g)(3), an Off-Menu Waiver to allow a side yard setback of 2'0" in lieu of the otherwise required 8'0" adjacent to a "Pedestrian Walk Street";
2. **Approve** a Director's Determination for the West Pico Boulevard Community Design Overlay Plan;
3. **Approve** a Site Plan Review for a development project which creates or results in an increase of 50 or more dwelling units;
4. **Adopt** the attached **Findings**;

6. **Adopt** Mitigated Negative Declaration No. ENV-2015-2210-MND for the above-referenced project;
7. **Adopt the Mitigation Monitoring Program** for Mitigated Negative Declaration No. ENV-2015-2210-MND;
8. **Advise** the applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring; and
9. **Advise** the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination (NOD) filing.

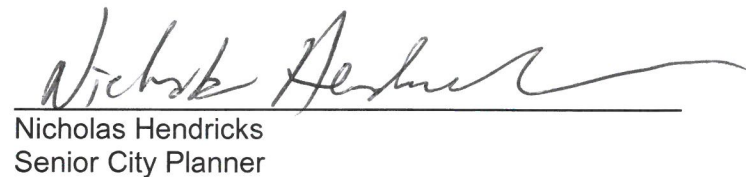
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ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 532, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

TABLE OF CONTENTS

Project Analysis	A-1
Project Summary	
Background	
Issues	
Conclusion	
Conditions of Approval	C-1
Findings	F-1
General Plan	
Density Bonus Compliance Review	
Community Design Overlay	
Site Plan Review	
Environmental	
Public Hearing and Communications	P-1
Maps:	
Map 1 – Vicinity Map	
Map 2 – Radius Map	
Exhibits:	
Exhibit A – Site Plan, Floor Plans, Elevations, Landscape Plan and Sign Plan	
Exhibit B – Mitigated Negative Declaration No. ENV-2015-3424-MND and Mitigation Monitoring Program for ENV-2015-3424-MND	
Exhibit C – Pro Forma	
Exhibit D – Feasibility Analysis	

PROJECT ANALYSIS

Project Summary

The proposed project involves the removal of the existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit residential building and the construction, use and maintenance of a five-story, 56-foot tall mixed-use building with 100 dwelling units, 2,625 square feet of restaurant and retail uses, 124 parking spaces in two subterranean levels and one at-grade level of parking, and 122 bicycle parking spaces, totaling approximately 78,484 square feet of floor area.

The proposed project would reach a maximum height of 56 feet (five (5) stories) for the portion of the building facing Pico Boulevard and would step down to 37 feet (three (3) stories) in height for the rear portion of the building within 50 feet of the R1 zoned properties south of the subject property.

The residential portion of the building would be comprised of three (3) live/work units, 58 studio apartments, 25 one-bedroom apartments, and 14 two-bedroom apartments along with approximately 10,325 square feet of open space, including a spa, a gym, a lounge, a community room, common roof deck, and a courtyard.

The proposed mixed-use development will consist of the following:

Size	Total
Residential Units	
<i>Live/Work</i>	3
<i>Studio</i>	58
<i>1 Bedroom</i>	25
<i>2 Bedroom</i>	14
Total Units	100
Commercial	
<i>Small Restaurant</i>	1,000 sf
<i>General Retail</i>	1,625 sf
Total Commercial	2,625 sf
Open Space	
<i>Gym (1st Floor)</i>	657 sf
<i>Rec Room (1st Floor)</i>	877 sf
<i>Courtyard (1st Floor)</i>	1,128 sf
<i>Courtyard (2nd Floor)</i>	1,507 sf
<i>Rec Room (4th Floor)</i>	697 sf
<i>Roof Deck (4th Floor)</i>	4,665 sf
<i>Roof Deck (5th Floor)</i>	444 sf
<i>Private Open Space (1st thru 3^d Floors)</i>	350 sf
Total Open Space	10,325 sf

The common roof deck is located on the 4th floor and contains a pool, a spa, seating areas and landscaping. The project is designed with open spaces at the edge of the building that create large breaks in the facades, thereby reducing the mass of the building while providing a variety of areas throughout the building for outdoor spaces.

Vehicular access to the subject property is provided through an alley along the southern boundary of the site with all commercial parking spaces located on the first parking level and all residential-only parking spaces provided at the second and third levels of the parking garage. The commercial parking area would be accessed through a two-way driveway and the residential-only parking area would be accessed through a separate two-way driveway. No vehicular access to any of the project's parking spaces would be located on or available from Pico Boulevard.

To construct the proposed mixed-use development, the applicant has requested a Density Bonus with On-Menu Incentives and Off-Menu Waivers; a Director's Determination for the West Pico Boulevard Community Design Overlay Plan; and a Site Plan Review.

Background

The subject property is a flat, interior lot with approximately 27,493 square feet (0.631 acres) of lot area. The property is developed with an existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family building. Currently access to the property is obtained through a two-way driveway along Pico Boulevard and alley at the rear. The proposed project will result in the removal of the existing driveway along Pico Boulevard.

General Plan Land Use Designation

The Palms - Mar Vista - Del Rey Community Plan designates the subject property for General Commercial land uses corresponding to the C1.5, C2, C4, RAS3 and RAS4 Zones. The subject property is zoned [Q]C2-1VL-CDO. The proposed project conforms to the conditions of the "Q" Qualified Classification.

Surrounding Properties

The surrounding land uses consist of mixture of commercial and residential uses. Properties to the north (across Pico Boulevard), east and west are zoned [Q]C2-1VL-CDO and are primarily developed with one-story commercial uses and associated surface parking. Properties to the south, across the alley, are zoned R1 and are primarily developed with one-story single-family dwellings.

Street and Circulation

Pico Boulevard, abutting the property to the north, is designated as an Avenue I (Secondary Highway), dedicated to a width of 100 feet and improved with asphalt roadway and concrete curb, gutter and sidewalk.

A public alley, abutting the property to the east, is dedicated to a width of 10 feet and improved with concrete.

A public alley, abutting the property to the south, is dedicated to a width of 20 feet and improved with asphalt roadway and concrete center gutter.

Site Related Cases and Permits

Case No. CPC-2002-3161-CDO-ZC - On January 28, 2004, the City Council adopted a Zone Change establishing the boundaries of the West Pico Blvd Community Overlay District (CDO) - Subareas 1 & 2 and effectuating various zone changes within the CDO. (Ordinance Nos. 175,773 & 175,774; effective March 20, 2004)

Surrounding Related Cases

Case No. DIR-2015-508-CDO - On July 28, 2015, the Director of City Planning approved a Director's Determination for the front façade improvements to an existing building, located at 12217 Pico Street.

Case No. DIR-2009-2615-CDO - On September 22, 2009, the Director of City Planning approved a Director's Determination for the remodel to existing taco bell, located at 12101 Pico Street.

Case No. DIR-2007-2758-CDO - On August 17, 2009, the Director of City Planning approved a Director's Determination for a Wireless Telecommunications Facility with 6 panel antennas, 1 GPS antenna, 1 microwave antenna and 4 equipment cabinets, located at 12121 Pico Street.

Case No. DIR-2008-4010-CDO - On October 22, 2008, the Director of City Planning approved a Director's Determination for the exterior remodel of existing single-story commercial building with news signs and facade materials, located at 11836 Pico Street.

Case No. DIR-2004-7113-SPR - On July 19, 2005, the Director of City Planning approved a Director's Determination for the demolition of existing retail, warehouse and office buildings and the construction new commercial retail building with parking, located at 11840 Olympic Boulevard.

Case No. DIR-2004-3731-CDO - On July 14, 2004, the Director of City Planning approved a Director's Determination for an addition and facade remodel to existing mixed-use building, located, at 11732 Pico Street.

Public Hearing

A Public Hearing on this matter was held on October 7, 2015 in Room 1020 at City Hall in downtown Los Angeles. (See Public Hearing and Communications, Page P-1)

Issues

Density

The subject property is approximately 27,493 square feet (29,994 square feet including ½ of the alley) in size and is zoned [Q]C2-1VL-CDO. The C2 Zone allows residential development consistent with the R4 Zone, or one (1) dwelling unit per 400 square feet of lot area. As such, the maximum density on the subject property is 74 dwelling units.

Pursuant to Section 12.22-A,25 (Density Bonus Ordinance) of the Municipal Code, projects which set aside 11% of the maximum allowable number of dwelling units (by-right) for Very Low Income Households are eligible to receive a 35% bonus in the total number of dwelling units that can be developed. The applicant will be providing an 11% set aside for Very Low Income Households and therefore is eligible to receive a 35% bonus. In applying a 35% density bonus, the subject project would be allowed to develop a maximum of 100 dwelling units (74 units (by-right) + 26 units (35% density bonus) = 100 units).

On-Menu Incentive

Height Limit - The applicant is requesting for an increase in the height limit to 56 feet in lieu of the permitted 45 feet. This height increase would only be permitted for that portion of the property which is beyond 50 feet from the adjacent R1 zoned properties to the south of the site, as shown in the Building Elevations in Exhibit "A".

Off-Menu Waivers

Floor Area Ratio - The applicant is requesting a 3:1 FAR in lieu of the otherwise permitted 1.5:1 FAR. Projects may request this increase as an "On-Menu Incentive", provided that it is located in a commercial zone in Height District No. 1, fronts on a Major Highway, provides the number of units sufficient to qualify for a 35% density bonus, at least 50 percent of the parcel is commercially zoned, and is within 1,500 feet of a Transit Stop/Major Employment Center.

While the proposed project meets most of these criteria, Mobility Plan 2035 designated the Pico Boulevard as an Avenue I. Therefore, the project is not entitled to the "On-Menu Incentive" as described above, and instead must request for a "Waiver or Modification of Development Standards Not on the Menu" pursuant to L.A.M.C. Section 12.22-A,25(g)(3).

Nevertheless, this requested FAR is consistent with the FAR allowed on multi-family developments in multi-family residential zones. The increase in FAR will help the project to remain economically feasible while providing 11% restricted affordable units. It is also appropriate to allow higher FARs on a commercial corridor that is within walking distance to multiple bus lines.

Transitional Height - The applicant is requesting to waive the transitional height limitations for the back portion of the building within 100 feet from the nearest R-1 zoned property. The transition height provisions of the Municipal Code restrict the heights of structures within 50 feet for R1 zoned properties to 25 feet and between 50 and 100 feet to 33 feet.

As shown in Exhibit "A", with the exception of a stairwell, the maximum height within 50 feet of the adjacent R1 zoned property would be 37 feet to the top of the parapet/railings. Beyond 50 feet from R1 zoned property, the building would reach a maximum height of 56 feet.

Number of Stories - The applicant is requesting to allow five (5) stories in lieu of the otherwise permitted three (3) stories. Had the proposed project been 100% residential, the number of stories would not be an issue, however because the project is a mixed-use development, the project is limited both as to height and stories. Section 12.22-A,25 (Density Bonus Ordinance) of the Municipal Code only allows one (1) additional story as an On-Menu Incentive and as such, the applicant has requested five (5) stories appropriately as an Off-Menu Waiver.

Side Yard Setback - The applicant is requesting to allow a side yard setback of 2'0" in lieu of the otherwise required 8'0" adjacent to a "Pedestrian Walk Street". L.A.M.C. Section 12.22-A,18(c)(3) (Developments Combining Residential and Commercial Uses) provides that within mixed-use buildings no setback is required for the ground floor when abutting an alley and used for commercial or residential purposes. Because the proposed project abuts a "Pedestrian Walk Street" and not an alley, this provisions of the Code does not apply. While the strict interpretation of the Code draws a distinction between a "Pedestrian Walk Street" and an alley, they are functionally and physically similar.

Proximity to the Santa Monica Freeway - Circulation

The subject property is located approximately 250 feet to the north of the Santa Monica Freeway (Interstate 10) right-of-way and the western terminus of the rear alley intersects with the northbound off-ramp for Bundy Avenue. Though LADOT did not believe the project would result in an impact to the off-ramp, in an abundance of caution the Mitigation Negative Declaration was sent to the State Clearinghouse for review by CalTrans. No response was received by CalTrans and therefore it is presumed that LADOT initial assessment was correct and that no impact would in fact occur at the Bundy Avenue off-ramp.

Proximity to the Santa Monica Freeway - Air Quality and Noise

Consistent with the City Planning Commission Freeway Adjacent Advisory Notice, a Health Risk Assessment was conducted which found that installing and maintaining air filtration systems with efficiencies equal to or exceeding Minimum Efficiency Reporting Values (MERV) of 11 (MERV 11) would limit potential health risks of future tenants.

As such, mitigation Measures were imposed through the Mitigated Negative Declaration to address the proximity to the freeway, including an air filtration system and noise mitigation standards for walls and windows.

Professional Volunteer Program

The proposed project was reviewed by the Department of City Planning's Urban Design Studio - Professional Volunteer Program (PVP) on October 1, 2015. The following issues, concerns, and recommendations were discussed:

- Enhance articulation of the southern facade to avoid large monotonous walls. Incorporate different textures, colors, materials, distinctive architectural treatments, or vertical breaks from the north facade to ensure all facades are treated with an equal level of detail, articulation, and architectural rigor. Ensure 360-degree architecture.
- Consider providing more room for pedestrian activity at the ground floor. Consider a continuous recess along the retail frontage to allow for usable outdoor seating, etc.
- Consider relocating some of the short-term bicycle parking to front the gym and community room, and create more room for outdoor seating in front of the retail.
- Soften transitions along the project edges with respect to building height, massing, and negative impacts of light and noise. Plant trees, shrubs, or vines to grow between property lines.
- Ensure the designated live/work units convey live/work uses (they currently convey residential only). Consider articulation that is distinct and different from residential uses, and landscaping in the form of pots or raised planters to activate live/work unit entries. Patio fences should incorporate changes in material, texture, and/or landscaping to avoid solid uninterrupted walls. Otherwise, relabel live/work units as 1-bedroom units.

In response to the comments from the Professional Volunteer Program, the applicant revised the project by removing the fourth floor level along the rear alley and breaking up the southern façade by adding large openings in the elevation, articulating the ground floor along Pico Boulevard with larger outdoor patio space and enhanced the landscaping at the perimeter of the building and

along the rooftop common open space area. Additionally, the live/work units are distinct from the other units in that they have each their own private entrance with landscaping and patio areas.

Conclusion

Based on the information submitted, the surrounding uses, input from the Public Hearing, the Department of City Planning recommends that the City Planning Commission approve the requested entitlements. As proposed, the project site will be redeveloped with a new mixed-use development including 100 dwelling units (nine (9) of which are set aside for very-low income households) and 2,625 square feet of restaurant and retail uses. The project will further the goals and objectives of the General Plan, the Palms - Mar Vista - Del Rey Community Plan and the West Pico Boulevard CDO by improving the built environment and locating density near local and regional transit services. As conditioned, the infill development will be desirable by redeveloping an underutilized site with a mixed-use development that will serve local business and residents.

Staff also recommends the adoption of Mitigated Negative Declaration No. ENV-2015-2210-MND and the associated Mitigation Monitoring Program.

CONDITIONS OF APPROVAL

Pursuant to Sections 12.22-A,25, 13.08-E and 16.05 of the Los Angeles Municipal Code, the following conditions are hereby imposed upon the use of the subject property:

Density Bonus Conditions

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit B," and attached to the subject case file. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.
2. **Residential Density.** The project shall be limited to a maximum density of 100 residential units including Density Bonus Units.
3. **Affordable Units.** A minimum of nine (9) units shall be reserved as affordable units for Very Low Income Households, as defined by the State Density Bonus Law 65915(C)(2).
4. **Changes in Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with L.A.M.C. Section 12.22-A,25.
5. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make nine (9) units available to Very Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file and to the Council Office and Neighborhood Council. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.
6. **Automobile Parking.** All commercial automobile parking shall be provided in conformance with LAMC Section 12.21-A,4. Electronic vehicle-ready conduits shall be installed for a minimum of 20% of the residential and commercial parking spaces.
7. **Adjustment of Parking.** In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth pursuant to L.A.M.C. Section 12.22-A,25.
8. **Solar-ready Rooftop.** Submit revised plans to show that the rooftop will be solar-ready as required by Section 99.04.211 of the L.A.M.C.

9. **Bicycle Parking.** Bicycle parking shall be provided consistent with L.A.M.C. Section 12.21-A,16.
10. **Height.** The building height shall not exceed 56 feet, as measured pursuant to L.A.M.C. Section 12.03, or five (5) stories, as requested under the Density Bonus On-Menu Incentive and Off-Menu Waiver.
11. **Floor Area Ratio.** The total floor area shall not exceed three (3) times the buildable area, as requested under the Density Bonus Off-Menu Waiver.
12. **Transitional Height.** The building height within 50 feet of the R1 zoned properties to the south shall not exceed 37 feet to the top of the parapet/railings for the 4th floor outdoor deck and 46 feet for the stairwell, as requested under the Density Bonus Off-Menu Waiver.
13. **Side Yard.** The building shall be permitted an easterly side yard setback of 2'0" in lieu of the otherwise required 8'0" adjacent to a "Pedestrian Walk Street", as requested under the Density Bonus Off-Menu Waiver.

Community Design Overlay/Site Plan Review Conditions

14. All planters containing trees shall have a minimum depth of 48 inches.
15. Exterior security grilles or permanently affixed security bars, or roll-down grilles that conceal storefront windows, and chain link fences that are visible from Pico Boulevard are prohibited. Interior security grilles, or vandal proof glazing which is resistant to impact may be permitted.
16. The applicant shall submit revised elevations which show a treatment along the western façade at the ground level consistent with the other ground level facades, including either the Graphic Mural Wall, wood slats or painted stucco similar that used for the retail spaces.
17. All exterior mechanical equipment, including HVAC equipment, satellite dishes, cellular antennas and air conditioners, shall not be visible from public rights-of-way or adjacent residences or placed in window or door openings.
18. Trash storage bins shall be located within the building or a gated, covered enclosure constructed of materials identical to the exterior wall materials of the building and screened with landscaping, so as not to be viewed from public right-of way or adjacent residences.
19. **Signage.** The approval of this application does not constitute approval of a signage plan. The applicant shall submit a detailed signage plan to the Department of City Planning for approval pursuant to the West Pico Boulevard Community Design Overlay Plan prior to the issuance of any signs for the project. No additional signs including, but not limited to, temporary banners or exterior merchandise displays shall be permitted on the street facing facades of the subject property without subsequent approval. Pursuant to this action, final plans shall not show signage.
20. **Street Trees.** Street trees shall be removed and planted as required by the Urban Forestry Division of the Bureau of Street Services. All street tree plantings shall be brought up to current standards. The actual number and location of new trees shall be determined at the time of tree planting.

Environmental Conditions

21. Aesthetics (Lighting)

- a. Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.
- b. The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

22. Biological Resources. Removal of trees in the public right-of-way requires approval by the Board of Public Works.

The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).

The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.

Trees shall be planted in the adjacent public right-of-way at a ratio of one tree for every thirty (30) feet of lot frontage or to the satisfaction of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

23. Geology and Soils. The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:

- a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
- b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.
- c. A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.

- d. "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.
- e. "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.
- f. Movement and removal of approved fencing shall not occur without prior approval by LADBS.

24. Green House Gas Emissions

- a. Only low- and non-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the Project.
- b. Any new construction shall include 20 percent of parking spaces set aside for EV ready parking.

25. Land Use and Planning (Increased Noise Levels – Mixed Use Development). Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

26. Land Use and Planning (Increased Noise Levels – Residential within 500 feet of a freeway). Installing and maintaining air filtration systems with efficiencies equal to or exceeding Minimum Efficiency Reporting Values (MERV) of 11 (MERV 11) as defined by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 (refer to Appendix D of the IS/MND).

27. Noise (Demolition, Grading and Construction Activities)

- a. Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- b. Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- c. The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- d. Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- e. The project developer shall install a temporary noise control barrier around the construction site abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent multifamily residential structures with a goal of a reduction of 10 dBA. The barrier shall be a similar height to the abutting residential buildings. The supporting structure shall be engineered and

erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and paving activities are complete.

28. **Noise (Parking Structure Ramps)**

- a. Concrete, not metal, shall be used for construction of parking ramps.
- b. The interior ramps shall be textured to prevent tire squeal at turning areas.

29. **Public Services (Fire).** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

30. **Public Services (Police - Construction).** Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

31. **Public Services (Police).** The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

32. **Transportation/Traffic (Pedestrian Safety)**

- a. 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 or blockage, at all times.
- b. Temporary pedestrian facilities shall 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.
- c. Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- d. 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.

Administrative Conditions of Approval

33. **Use.** The use of the subject property shall be limited to the uses as permitted in the [Q]C2-1VL-CDO Zone as defined in L.A.M.C. Section 12.14, except as modified by the conditions herein or subsequent action.
34. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, reviews or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning for placement in the subject file.
35. **Code Compliance.** All area, height and use regulations of the zone classification of the subject property shall be complied with, except wherein these conditions explicitly allow otherwise.
36. **Covenant.** Prior to the issuance of any permits relative to this matter, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Development Services Center for inclusion in the case file.
37. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public offices, legislation or their successors, designees or amendment to any legislation.
38. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
39. **Building Plans.** Page 1 of the grant and all the conditions of approval shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety.
40. **Corrective Conditions.** The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the City Planning Commission, or the Director pursuant to Section 12.27.1 of the Municipal Code, to impose additional corrective conditions, if, in the Commission's or Director's opinion, such conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
41. **Expedited Processing Section.** Prior to the clearance of any conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.
42. **INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.**

Applicant shall do all of the following:

- a. Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and

approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

- b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages and/or settlement costs.
- c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$25,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).
- d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement (b).
- e. If the City determines it necessary to protect the City's interests, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commission, committees, employees and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

1. General Plan Findings

a. General Plan Land Use Designation. The subject property is located within the Palms - Mar Vista - Del Rey Community Plan area which was updated by the City Council on September 16, 1997. The plan map designates the site for General Commercial land uses, corresponding to the C1.5, C2, C4, RAS3, and RAS4 Zones. The proposed mixed-use building with 100 new residential units and 2,625 square feet of restaurant and retail uses is consistent with other development permitted in the C2 Zone and which sets aside nine (9) units for Very-Low Income Households pursuant to the Density Bonus Ordinance. Therefore, the project is in substantial conformance with the purposes, intent and provisions of the General Plan as reflected in the adopted Framework Element and Community Plan.

b. Land Use Element.

The proposed project complies with all applicable provisions of the Los Angeles Municipal Code, the Palms - Mar Vista - Del Rey Community Plan, the Los Angeles Coastal Transportation Corridor Specific Plan Area and the West Pico Boulevard Community Design Overlay (CDO).

There are twelve elements of the General Plan. Each of these elements establishes policies that provide for the regulatory environment in managing the City and for addressing environmental concerns and problems. The majority of the policies derived from these Elements are in the form of Code requirements of the Los Angeles Municipal Code.

The Land Use Element of the City's General Plan is divided into 35 Community Plans. The subject property is located within the Palms - Mar Vista - Del Rey Community Plan, which designates the site for General Commercial land uses, corresponding to the C1.5, C2, C4, RAS3, and RAS4 Zones.

The proposed project is consistent with the following goals and policies of the Palms - Mar Vista - Del Rey Community Plan:

Goal 2: A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed, safe and accessible areas while preserving the historic, commercial and cultural character of the community.

Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services within existing commercial areas.

Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.

Policy 2-1.4: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.

Objective 2-2: To promote distinctive commercial districts and pedestrian-oriented areas.

Policy 2-2.1: Encourage Pedestrian-oriented design in designated areas and in new development.

Policy 2-2.2: Require that mixed-use projects and development in pedestrian-oriented areas are developed according to specific design guidelines to achieve a distinctive character and compatibility with surrounding uses.

Policy 2-2.4: Promote mixed use projects along designated transit corridors and in appropriate commercial centers.

Objective 2-3: To enhance the appearance of commercial districts.

Policy 2-3.1: Require that the design of new development be compatible with adjacent development, community character and scale.

The proposed project is a mixed-use building with 100 new residential units and 2,625 square feet of restaurant and retail uses. The project will not only provide opportunities for new commercial uses, it will also strengthen the existing commercial development in the community by adding to the consumer base through the introduction of new residents.

The proposed project is well-designed with commercial uses oriented to the street and the upper levels articulated such that the massing of the building is reduced. In addition, the project is located less than 600 feet from a Big Blue Bus Rapid Route (Rapid 7) bus stop at the intersection of Bundy Avenue and Pico Boulevard.

Lastly, as explained further below, the proposed project is consistent with the West Pico Boulevard CDO, which imposed design standards to ensure that new development is compatible with adjacent development, community character and scale.

- c. The **Framework Element** for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following goals, objectives and policies relevant to the instant request:

Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

- Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram and Table 3-1 (Land Use Standards and Typical Development Characteristics).
- Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.
- Policy 3.2.1: Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.
- 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.
- Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.

The proposed project will contribute toward and facilitate the City's long-term fiscal and economic viability by redeveloping an underutilized site with new mixed-use development including 100 dwelling units (nine (9) units which are set aside for Very-Low Income Households) and 2,625 square feet of restaurant and retail uses. The project's proximity to the Big Blue Bus Rapid Route (Rapid 7) and other transit connections will reduce vehicular trips to and from the project, vehicle miles traveled, and reduce air pollution; and its location within an existing, under-utilized commercial district and on an Avenue I will enable the city to conserve nearby existing stable residential neighborhoods and lower-intensity commercial districts.

Goal 3: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.

- Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.

Policy 3.9.1: Accommodate the development of community-serving commercial uses and services and residential dwelling units in areas designated as "Community Center" in accordance with Tables 3-1 and 3-5. The ranges and densities/intensities of uses permitted in any area shall be identified in the community plans.

Policy 3.9.6: Require that commercial and mixed-use buildings located adjacent to residential zones be designed and limited in height and scale to provide a transition with these uses, where appropriate.

The proposed project will reinforce existing commercial development along Pico Boulevard with 2,625 square feet of new community-serving commercial uses and adding 100 new dwelling units (nine (9) units which are set aside for very-low income households) to further promote daytime and nighttime neighborhood activity.

The proposed project is limited to 37 feet in height within 50 feet of the adjacent to the R1 zoned properties to the south and the building's the southern façade is broken up with large areas of open space. As such, as viewed from the single-family neighborhood to the south, the building's mass and scale is diminished, providing an appropriate transition from the proposed higher density development.

Goal 5A: A liveable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.

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.

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. Additionally, develop these areas so that they are compatible with surrounding neighborhoods.

The proposed project is located in a transit-rich area with numerous transit services in close proximity, including a Big Blue Bus Rapid Route (Rapid 7) bus stop located less than 600 feet from the subject property which provides service from the City of Santa Monica to Koreatown and the Metro Purple Line Station at Western Avenue and Wilshire Boulevard. In addition, the project is less than one (1) mile from the soon-to-be opened Metro Expo Line Station at Sepulveda and Exposition Boulevards. Given the existing and future transit infrastructure in the area, it is appropriate to locate the proposed density at the subject property.

- d. The **Mobility Element** of the General Plan (Mobility Plan 2035) is not likely to be affected by the recommended action herein. Pico Boulevard is designated as an Avenue I (Secondary Highway), dedicated to a width of 100 feet and improved with asphalt roadway and concrete curb, gutter and sidewalk. No further widening is required for Pico

Boulevard. Additionally Mobility Plan 2035 identifies Pico Boulevard as a Moderate Plus Transit Enhanced Street.

The project as designed and conditioned will meet the following goals and objectives of Mobility Plan 2035:

- Policy 2.3: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.
- Policy 2.5: Improve the performance and reliability of existing and future bus service.
- Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.

The proposed project will maintain the approximately 15-foot wide sidewalk along Pico Boulevard while orienting new commercial uses toward the street providing a high-quality, safe and comfortable walking environment. The project also will activate the existing alley to the east with Live-Work units fronting the right-of-way further improving pedestrian safety and access around the site.

All vehicular ingress and egress to the site will be from the public alley at the back of the building. Curb cuts and driveways along Pico Boulevard were specifically avoided in order to reduce any impact on circulation in the surrounding area, including the performance and reliability of transit services and to avoid crossing the sidewalk.

Similarly, the proposed loading area is located on-site, thereby lessening any impact the project may have on circulation in the surrounding area.

- e. The **Housing Element** of the General Plan seeks to meet the variety of housing needs of the City's growing population through the provision of affordable housing and amenity-rich, sustainable neighborhoods for its residents. The proposed project is consistent with the following objectives and policies of the Housing Element:

- Objective 1.1: Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.

- Policy 1.1.2: Expand affordable rental housing for all income groups that need assistance.

- Policy 1.1.3: Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.

- Objective 1.3: Forecast and plan for changing housing needs over time in relation to production and preservation needs.

- Policy 1.3.5: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within the City to meet the projections of housing needs, according to the policies and objectives of the City's Framework Element of the General Plan.

The proposed project will result in the construction of 100 new rental dwelling units, including nine (9) units set aside for Very Low Income Households. The project would be

would be comprised of three (3) live/work units, 58 studio apartments, 25 one-bedroom apartments, and 14 two-bedroom apartments.

The project will expand affordable rental housing through the provision of nine (9) units to be set aside for Very Low Income Households. The proposed 100 new dwelling units are properly located within a transit-rich area, consistent with the City's policies and objectives toward transit-oriented development and the range of different housing types will help meet the particular needs of the city's households.

2. Density Bonus/Affordable Housing Incentives Compliance Findings

Pursuant to Section 12.22-A,25(c) of the LAMC, the Director shall approve a density bonus and requested incentive(s) unless the director finds that:

- a. The incentives are not required to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.**

Requested On-Menu Incentive

The record does not contain substantial evidence that would allow the Director to make a finding that the requested incentives are not necessary to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for Very Low, Low, and Moderate Income Households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25% gross income based on area median income thresholds dependent on affordability levels.

The list of On-Menu Incentives in 12.22-A,25 were pre-evaluated at the time the Density Bonus Ordinance was adopted to include types of relief that minimize restrictions on the size of the project. As such, the Director will always arrive at the conclusion that the density bonus On-Menu Incentives are required to provide for affordable housing costs because the incentives by their nature increase the scale of the project.

Height Limit: Height District 1-VL restricts mixed-use buildings in the C2 zone to a height limit of 45 feet. As proposed, the project has a height of 56 feet, which exceeds the height limit by 11 feet. The additional 11 feet will allow for the construction of the 5th story to accommodate 18 dwelling units, which would help alleviate the project's costs of providing the affordable units.

Requested Off-Menu Waiver

The requested Off-Menu Waivers for a Floor Area Ratio of 3:1, a waiver of transitional height limitations, five (5) stories and a reduced side yard setback, are not expressed in the Menu of Incentives per LAMC Section 12.22-A,25(f) and, as such, are subject to LAMC Section 12.22-A,25(g)(3), which requires a pro forma or other documentation to show that the waiver or modification of any development standards are needed in order to make the Restricted Affordable Units economically feasible.

The applicant submitted a pro forma, attached as Exhibit E, along with an independent third-party Feasibility Analysis of the pro forma. The pro forma evaluated three (3) scenarios. Scenario 1 evaluated the project without incentives, Scenario 2 evaluated the project with only a 35% density bonus and on-menu height incentives that achieves

a 2.0 FAR (with on-menu incentives), and Scenario 3 evaluated the project with the all of the requested incentives.

The submitted pro forma has been reviewed by a California Certified General Appraiser who submitted a Feasibility Analysis and found that of the three scenarios, only the third scenario was feasible.

The requested Off-Menu Waivers allow the developer to expand the building envelope to allow for the construction of the density bonus units and increase the overall space dedicated to residential uses. These waivers support the applicant's decision to set aside nine (9) units for Very Low Income Households for a period of 55 years, as described below:

Floor Area Ratio: The proposed project requests an increase in the Floor Area Ratio (FAR) from 1.5:1 to 3:1. The project does not qualify for the On-Menu Incentive which allows for an increase to 3:1 if the site fronts on a Major Highway, qualifies for a 35% Density Bonus, and is located within 1,500 feet of a Transit Stop/Major Employment Center. Subsequent to Mobility Plan 2035, Pico Boulevard was re-designated as an Avenue I and therefore the project is not located on a Major Highway, as required.

The permitted 1.5:1 FAR would restrict the building envelope and limit the ability to construct of a sufficient number of units which are of a sufficient size. The 3:1 FAR would allow for the construction of units which are sufficient in size and allow for the set aside of nine (9) Restricted Affordable units.

Story Limit: Mixed-use buildings in the C2-1VL are limited to three stories, whereas buildings which are 100% residential are not limited in the number of stories, only in feet. While the project proposes to provide 2,625 square feet of commercial floor area, the use of the building is primarily residential. The limitation on the number of stories would restrict the ability to develop the site to its maximum density and provide dwelling units of a sufficient size while also setting aside dwelling units for Restricted Affordable housing. Specifically, the additional two (2) stories will allow for the construction of the 4th and 5th stories, accommodating 36 dwelling units.

Transitional Height: Buildings located in the C or M Zones are subject to Transitional Height limitations when abutting an RW1 or more restrictive zone. As applicable to the proposed project, any portion of a building within 49 feet of an RW1 or more restrictive zone would be limited to 25 feet in height and any portion of a building within between 50 and 99 feet of said zone would be limited to 33 feet in height. Such a limitation on the building height would severely restrict the ability to develop the site to its maximum density and provide dwelling units of a sufficient size while also setting aside dwelling units for Restricted Affordable Housing. Specifically, the Transition Height limits would result in the removal of one floor within 49 feet of an R1 zoned properties to the south and the removal of two floors between 50 and 99 feet of said properties and approximately 17 units.

Side Yard Setback: L.A.M.C. Section 12.22-A,18(c)(3) (Developments Combining Residential and Commercial Uses) provides that within mixed-use buildings no setback is required for the ground floor when abutting an alley and used for commercial or residential purposes. Because the proposed project abuts a "Pedestrian Walk Street" and not an alley, this provisions of the Code does not apply. Nevertheless, while the strict interpretation of the Code draws a distinction between a "Pedestrian Walk Street" and an alley, they are functionally and physically similar.

The requested Off-Menu Waiver to allow a reduced side yard setback will allow for additional floor area, increasing the unit sizes along the eastern edge of the from 1st to the 5th floor. In addition, the reduced side yard will allow for the construction of private patios, enclosed with privacy walls for the Live/Work units at the ground floor adjacent to the “Pedestrian Walk Street”. These two allowances resulting from a reduced side yard enable the project to construct the density bonus units, thereby facilitating the set-aside of nine (9) dwelling units for Restricted Affordable Housing

- b. The Incentive will have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there are no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.**

There is no evidence that the proposed incentive will have a specific adverse impact. A “specific adverse impact” is defined as, “a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete” (LAMC Section 12.22-A,25(b)). The proposed project and potential impacts were analyzed in accordance with the City’s Environmental Quality Act (CEQA) Guidelines and the City’s L.A. CEQA Thresholds Guide. These two documents establish guidelines and thresholds of significant impact, and provide the data for determining whether or not the impacts of a proposed project reach or exceed those thresholds. Analysis of the proposed project involved the preparation of a Mitigated Negative Declaration (MND) (ENV-2015-2210-MND), and it was determined that the proposed project may have an impact on the following environmental factors: aesthetics; biological resources; cultural resources; geology and soils; greenhouse gas emissions; land use and planning; noise; public services; and transportation/traffic. However, mitigation measures will reduce impacts to less than significant levels, and are imposed as Conditions of Approval herein (Conditions No. 21 through 32). Therefore, there is no substantial evidence that the proposed project will have a specific adverse impact on the physical environment, on public health and safety, and on property listed in the California Register of Historic Resources.

3. Community Design Overlay Findings

- a. The project substantially complies with the adopted Community Design Overlay Guidelines and Standards.**

SITE PLANNING:

STANDARD 1: BUILDING ORIENTATION - COMMERCIAL PROJECTS - All Buildings should have a ground floor and the primary ground floor building and entrances should be oriented towards Pico Boulevard. All Projects should provide a convenient pedestrian entrance directly accessible from the sidewalk at the ground floor for each business which fronts on Pico Boulevard, even when rear public entrances are provided.

The proposed project orientates the ground floor retail/restaurant uses toward Pico Boulevard with all three (3) entrances to the commercial tenants located along the Pico Boulevard sidewalk, thereby enhancing the pedestrian experience along the

commercial corridor. No access from the parking garage to the commercial tenants is available without first using the Pico Boulevard sidewalk.

STANDARD 2: BUILDING SETBACK/PEDESTRIAN ORIENTATION - COMMERCIAL PROJECTS - *The exterior wall of any new construction or addition of floor area should be located not more than five (5) feet from any lot line adjoining Pico Boulevard, except that building setbacks from the front lot line may exceed five feet when used for landscaping, plazas, courtyards, outdoor dining, seating, kiosks, paseos, or for other active public uses.*

The proposed project is designed to be oriented to the street by locating the most of the building within two (2) feet of the front property line. Those portions of the building which are recessed further back from the front property line are used for landscaping, outdoor dinner, bicycle parking and building entrances. In addition, the residential leasing office, proposed gym and community room are located at the ground floor along the Pico Boulevard frontage further activating the street.

ARCHITECTURE:

STANDARD 4: ARTICULATION – MIXED-USE PROJECTS COMBINING RESIDENTIAL WITH COMMERCIAL, AND RESIDENTIAL ONLY PROJECTS - *Mixed use projects should be designed vertically as part of an overall site plan and be oriented to the street. The residential portion of the building should be differentiated from the ground floor commercial by upper level step-backs, change in color, texture, or materials, recessed balconies or other offsets in the plane of the facade or variations.*

The proposed project establishes a clear differentiation between the ground floor commercial uses and the upper level residential uses by setting the upper levels forward creating an overhang which then provides for open areas used for landscaping, outdoor dining and building entrances at the ground floor. In addition, the ground floor commercial uses primarily use wood and glazing for the exterior façade treatment, whereas the residential uses above use primarily a stucco treatment.

Buildings should have consistent materials and details, such as, recessed doors and windows emphasized through the use of sills, lintels, mullions, muntins, pediments, or other scale providing features, and eaves, similar on all sides of the building, and they should be reflective of the style utilized. In a Spanish Colonial/ Mediterranean style, buildings should be designed with thick plaster walls, red terra cotta tile roofs, steel filigree and tile work, and windows should not have frames flush with the outside plane of the wall. In traditional buildings, multi-pane wood casement windows and french doors could be used. Metal or wood sliding windows and doors should be used only on modern buildings.

The proposed project uses a consistent color and material palette for the northern, eastern and southern facades at the ground floor levels and has been conditioned to provide a similar color or material palette for the eastern façade. Above the ground floor level, the project uses a combination of stucco and glazing to be compatible with the project's modern architecture.

In a mixed-use building, there should be less glass-to-wall ratio for residential uses than for commercial uses. Windows with clear glass and balconies or terraces should face the street so that there is a visual connection with the street.

At the ground floor level, the project includes 60% or more of glazing for the exterior façade facing Pico Boulevard. As well, in addition to the 2,625 square feet of new commercial uses along Pico Boulevard, the ground floor contains the residential leasing office, proposed gym and community room further activating the street. Above the ground floor level, the project reduces the amount of glazing used, but instead incorporates more breaks in the building creating open-air bridges and decks that allow for greater connectivity between the street and the building.

Storefronts in mixed-use buildings should reflect the dimensions and proportions of the building, subdivided by columns, piers or wall areas that visually carry the mass and proportion of upper floors to the ground. Each commercial use on the street should have an individual public entry directly accessible from the public sidewalk on Pico Boulevard. For mixed-use projects with 125 feet or more of building frontage on Pico Boulevard, there should be at least one primary entry at the same elevation as the public sidewalk, oriented and directly accessed from Pico Boulevard for the residential use.

The proposed project is designed with architectural elements, such as building recesses and façade treatments, that tie the ground floor uses to the residential levels above, but that nevertheless maintain a clear distinction between the various uses, as discussed above. Each commercial tenant space, as well as the main residential lobby, has a primary entrance directly from Pico Boulevard, which will activate the public sidewalk in front of the development.

In mixed-use developments, signage should be located and illuminated in such a way as to avoid adverse impacts such as light or glare into residential units.

The proposed project does not include any signage which is either located or illuminated in a way as shine light or glare into residential units.

STANDARD 7: WINDOW SECURITY GRILLES AND CHAIN LINK FENCES – ALL PROJECTS - *Exterior security grilles or permanently affixed security bars, or roll down grilles that conceal storefront windows, and chain link fences that are visible from Pico Boulevard are prohibited. Stores should use alternatives such as interior security grilles, or vandal proof glazing which is resistant to impact. Industrial Projects should not have any security grilles or chain link fences on the Pico Boulevard/ Southern Pacific Railroad Right-of-Way frontage.*

No exterior security grilles are proposed. Nonetheless, a condition has been imposed to ensure that security grilles or permanently affixed security bars, or roll-down grilles are not visible from Pico Boulevard.

STANDARD 9: MECHANICAL EQUIPMENT SCREENING AND TRASH CONTAINERS – ALL PROJECTS - *Equipment should be enclosed or screened through use of building parapets, masonry walls or other architectural treatments that are integral to the building's form. All exterior mechanical equipment, including HVAC equipment, satellite dishes, cellular antennas, should not be visible from public rights-of-way. Trash storage bins should be located within a gated, covered enclosure constructed of materials identical to the exterior wall materials of the building and screened with landscaping, so as not to be viewed from public right-of way or adjacent residences. No mechanical equipment (e.g., air conditioners) should be placed in window or door openings.*

No mechanical equipment, including HVAC equipment, satellite dishes, cellular antennas are shown on the plans. The first floor plan indicates that the trash and

recycling bins would be located by the ground floor level parking spaces adjacent to the elevators. Nonetheless, conditions has been imposed to ensure that all exterior mechanical equipment and trash storage bins be located so as to not to be viewed from public right-of way or adjacent residences. A transformer pad is proposed for the southeast side of this building and shown behind the Graphic Mural Wall.

STANDARD 10: EXTERIOR SURFACE MATERIALS – ALL PROJECTS - *The exterior facade of buildings should incorporate no more than three complementary building materials and colors each, including but not limited to glass, tile, terracotta, brick, stucco or stone. Bright or intense colors and stark colors such as white or black should not be utilized for large areas. Bright colors on architectural detailing, trim, window sashes, doors and frames, or awnings may be used if they are compatible with the color scheme of the building.*

The proposed project uses a combination of three materials, including wood siding, stucco and glass to create a modern building. The colors used for the stucco include a variety of light greys and greens and a complimentary yellow, which will enhance the aesthetic quality of the building.

PARKING:

STANDARD 13: SURFACE PARKING – ALL PROJECTS - *Surface parking lots should not be located between the front property line and the primary building/ storefront on Pico Boulevard. Surface parking should be located to the rear of all structures if vehicular access is available to the rear of the parcel either from an alley or a public street.*

The proposed project does not include and surface parking, however access to the parking and loading areas are at the rear of the subject site through the adjacent alley.

LANDSCAPING:

STANDARD 14: LANDSCAPING AND STREET TREES – ALL PROJECTS - *All areas of a site not occupied by buildings or driveways, should be landscaped at site entrances and along walkways. Landscaping consisting of small trees, planter boxes or tubs of flowers should be provided, where feasible. Plants should not obstruct the pedestrian right-of-way nor create inappropriate visual or physical barriers for vehicles or pedestrians. Landscaping should consist of plant materials, such as trees and shrubs or ground cover.*

The proposed project includes various courtyards and decks starting at the ground level and up to the fourth-floor level which are open to the sky and provide for the planter boxes with trees, shrubs and ground cover. In addition, at the perimeter of the ground floor along Pico Boulevard, the “Pedestrian Walk Street” and the rear alley, landscaping has been included to create a buffer better the building and the public rights-of-way.

Trees should be planted in the adjacent public right-of-way at a ratio of one tree for every thirty (30) feet of lot frontage or to the satisfaction of the Street Tree Division, Bureau of Street Services, Department of Public Works.

The project has been conditioned to plant trees to the satisfaction of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, including at a ratio of one (1) tree for every thirty (30) feet of lot frontage.

STANDARD 15: LANDSCAPING FOR SURFACE PARKING LOTS – ALL PROJECTS

- Wherever a surface parking lot abuts a public street or public sidewalk, screening and buffering of the parking lot should be provided by a five (5) foot landscaped buffer to be located between the property line and the parking area. Landscaping should consist of plant materials, such as trees, shrubs and planted ground cover.

The subject project does not propose a surface parking lot. Thus, these provisions do not apply.

STANDARD 16: LANDSCAPING FOR PARKING STRUCTURES – ALL PROJECTS -

Parking structures should be visually screened from frontage streets and adjoining uses by a landscape buffer consisting of trees, planters and vegetation around their perimeters. The landscaped area should contain one 24-inch box tree minimum trunk diameter of two (2) inches and a height of ten (10) feet at the time of planting, and should be planted at a ratio of one for every twenty (20) lineal feet. The landscaped setback should contain clinging vines or similar vegetation capable of covering or screening the length of the wall up to a height of at least nine feet along a street frontage. Planter boxes associated with the screening should not be used to add to the height of the structure. An automatic irrigation system should be installed within the landscaped area.

The subject project does not include a parking structure. Thus, these provisions do not apply.

SIGNAGE:**STANDARD 17: BUILDING IDENTIFICATION (WALL) SIGNS – ALL PROJECTS -**

Each building or premise is allowed one sign containing the name, and/or address, or logo of the building on the site. The sign area of a building identification sign should not be more than four (4) square feet.

STANDARD 18: BUSINESS IDENTIFICATION (WALL) SIGNS – ALL PROJECTS -

Any business is permitted one wall sign for each face of each building on an exterior wall that has frontage on a public street and has a public entrance from the street frontage containing the name of the business and logo.

STANDARD 19: SIZE AND TYPE OF WALL SIGNS – ALL PROJECTS -

The total sign area of a wall sign should not exceed 1.5 square feet for each foot of store or building frontage. No sign should exceed a maximum of 75 square feet. For wall signs that are made up of channel or individual letters/ logos, the overall composition of the height of signs should not exceed two (2) feet, or height of letters more than eighteen (18) inches.

Wall signs should not project more than twelve (12) inches from a wall. No portion of a wall sign should extend above a building wall or above a roofline. Signs in a multi-tenant building should be placed at the same uniform elevation to create visual continuity (applicable to each level of a multi-tenant retail/office building).

Signs should be constructed of channel or individual letters/ logos or metal, stone, wood or other non illuminated, non-plastic material. Canister wall signs may be permitted only if they have opaque, or translucent, non-illuminated face panels with only individual letters and/ or logos back-lit, and not the entire surface of the sign. Internally illuminated letters (routed/ stenciled/ embossed) may be plastic, but the face panels should not have glossy reflective surfaces.

STANDARD 20: MONUMENT SIGNS – ALL PROJECTS - *There shall be only one monument sign per multi-tenant business or building. The maximum size of a monument sign should be twenty four (24) square feet per side. Signs should be constructed of metal, stone, wood or other non-illuminated, non-plastic material. If a plastic Canister is utilized, the sign should have opaque, or translucent, non-illuminated face panels with only individual letters and/ or logos back-lit, and not the entire surface of the sign. Internally illuminated letters (routed/stenciled/embossed) may be plastic, but the face panels should not have glossy reflective surfaces.*

STANDARD 21: PROJECTING SIGNS – ALL PROJECTS - *The number of projecting signs should not exceed one per business. The area of such sign should be limited to four (4) square feet per sign face. Signs should be constructed of metal, stone, wood or other nonilluminated, non-plastic material. If a plastic Canister is utilized, the sign should have opaque, or translucent, non-illuminated face panels with only individual letters and/ or logos back-lit, and not the entire surface of the sign. Internally illuminated letters (routed/ stenciled/ embossed) may be plastic, but the face panels should not have glossy reflective surfaces. No sign should project more than thirty (30) inches from the building wall to where it is attached or extend above parapet line of the roof.*

STANDARD 22: AWNING SIGNS – ALL PROJECTS - *In addition to wall signs, each building/business is allowed one awning sign to be located on the awning over the building/business entrance. Awning valences may have letters, numbers, or symbols not to exceed ten (10) inches in height and covering no more than seventy (70) percent of the valence area. The name, occupation, and/or address of the business is permitted on the awning signs. Telephone numbers or services offered are not to be included on any part of the awning.*

STANDARD 23: WINDOW SIGNS – ALL PROJECTS - *Only one window sign per business is allowed. Window signs, consisting of text, graphics or images, either permanent or temporary, should not exceed four (4) square feet or ten (10) percent of the total window area, whichever is less.*

STANDARD 24: INFORMATION SIGNS – ALL PROJECTS - *Signs which direct vehicular and pedestrian traffic to parking areas or other onsite destinations or explain parking fees should not exceed nine (9) square feet or a vertical or horizontal dimension of thirty six (36) inches, and should be consistent in design with the signage for the rest of the project. These are to be used for on-site directional information only and not for advertising. Signs should be constructed of metal, stone, wood or other non-illuminated, non-plastic material. If a plastic Canister is utilized, the sign should have opaque, or translucent, non illuminated face panels with only individual letters and/ or logos back-lit, and not the entire surface of the sign. Internally illuminated letters (routed/ stenciled/ embossed) may be plastic, but the face panels should not have glossy reflective surfaces.*

The proposed project does not include the approval on any signage and any future signage would be reviewed for compliance with the Community Design Overlay.

- b. The structures, site plan and landscaping are harmonious in scale and design with existing development and any cultural, scenic or environmental resources adjacent to the site and the vicinity.**

There are no identified cultural, scenic or environmental resources in the vicinity. The proposed subject project is harmonious in scale and design, structure, site plan and landscaping with the existing development with the surrounding area.

4. Site Plan Review Findings

In order for the site plan review to be granted, all three of the legally mandated findings delineated in Section 16.05-F of the Los Angeles Municipal Code must be made in the affirmative:

- a. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and does not conflict with any applicable regulations, standards, and any applicable specific plan.**

The proposed project complies with all applicable provisions of the Los Angeles Municipal Code, the Palms - Mar Vista - Del Rey Community Plan, the Los Angeles Coastal Transportation Corridor Specific Plan Area and the West Pico Boulevard Community Design Overlay (CDO).

There are twelve elements of the General Plan. Each of these elements establishes policies that provide for the regulatory environment in managing the City and for addressing environmental concerns and problems. The majority of the policies derived from these Elements are in the form of Code requirements of the Los Angeles Municipal Code.

The Land Use Element of the City's General Plan is divided into 35 Community Plans. The subject property is located within the Palms - Mar Vista - Del Rey Community Plan, which designates the site for General Commercial land uses, corresponding to the C1.5, C2, C4, RAS3, and RAS4 Zones.

The proposed project is consistent with the following goals and policies of the Palms - Mar Vista - Del Rey Community Plan:

Goal 2: A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed, safe and accessible areas while preserving the historic, commercial and cultural character of the community.

Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services within existing commercial areas.

Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.

Policy 2-1.4: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.

Objective 2-2: To promote distinctive commercial districts and pedestrian-oriented areas.

Policy 2-2.1: Encourage Pedestrian-oriented design in designated areas and in new development.

Policy 2-2.2: Require that mixed-use projects and development in pedestrian-oriented areas are developed according to specific design guidelines to achieve a distinctive character and compatibility with surrounding uses.

Policy 2-2.4: Promote mixed use projects along designated transit corridors and in appropriate commercial centers.

Objective 2-3: To enhance the appearance of commercial districts.

Policy 2-3.1: Require that the design of new development be compatible with adjacent development, community character and scale.

The proposed project is a mixed-use building with 100 new residential units with nine (9) units for Very Low Income Households and 2,625 square feet of restaurant and retail uses. The project will not only provide opportunities for new commercial uses, it will also strengthen the existing commercial development in the community by adding to the consumer base through the introduction of new residents.

The proposed project is well-designed with commercial uses oriented to the street and the upper levels are articulated such that the massing of the building is reduced. Within 50 feet of the R1 zoned properties the south the building has a maximum height of 37 feet, with the exception of one (1) stairwell.

In addition, the project is located in a transit-rich area with numerous transit services in close proximity, including a Big Blue Bus Rapid Route (Rapid 7) bus stop located less than 600 feet from the subject property which provides service from the City of Santa Monica to Koreatown and the Metro Purple Line Station at Western Avenue and Wilshire Boulevard. The soon-to-be opened Metro Expo Line Station at Sepulveda and Exposition Boulevards is less than one (1) mile from subject property which will further expand transit opportunities in the area.

Lastly, as explained further below, the proposed project is consistent with the West Pico Boulevard CDO, which imposed design standards to ensure that new development is compatible with adjacent development, community character and scale.

Therefore, the project is in substantial conformance with the purposes, intent and provisions of the Palms - Mar Vista - Del Rey Community Plan and does not conflict with any applicable regulations or standards.

- b. That the project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on neighboring properties.**

The proposed project includes the construction of 100 apartment units with nine (9) units for Very Low Income Households and 2,625 square feet of restaurant and retail uses within a 78,484 square-foot (with an FAR of approximately 2.9 to 1), five-story (56-foot tall) building above two (2) levels of subterranean parking and one (1) level of at-grade parking. The project provides a total of 124 vehicle parking spaces: 113 residential parking spaces at the subterranean levels and 11 commercial parking spaces at-grade level. The project will also provide 122 bicycle parking spaces, including short-term bicycle parking spaces along Pico Boulevard.

The subject property is a flat, interior lot with approximately 27,493 square feet of lot area. The property is developed with an existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family building. Currently access to the property is obtained through a two-way driveway along Pico Boulevard and alley at the rear. The proposed project will result in the removal of the existing driveway along Pico Boulevard.

The surrounding land uses consist of mixture of commercial and residential uses. Properties to the north (across Pico Boulevard), east and west are zoned [Q]C2-1VL-CDO and are primarily developed with one-story commercial uses and associated surface parking. Properties to the south, across the alley, are zoned R1 and are primarily developed with one-story single-family dwellings.

Height, Bulk and Setbacks

The proposed project located across a 20-foot wide public alley from the adjacent R1 zoned properties to the south. As such, the 37-foot height limit allows the building to be more compatible with the adjacent to the R1 zoned properties. Furthermore, the southern façade is broken up with large areas of open space, further reducing the building's bulk as viewed from the south.

The majority of the building's mass is located along the Pico Boulevard frontage and while the proposed project is unlike existing development along Pico Boulevard, it is compatible with future development, as evidenced by the recent approval and construction of a 56-foot tall residential development located at 12301-12333 Pico Boulevard, approximately 1,000 feet to the west of the subject property.

The proposed setbacks are consistent with other commercial and mixed-use developments which typically not required any setback.

Therefore, the height, bulk and setbacks of the mixed-use building will be compatible with the existing and future developments in the neighborhood.

Off-Street Parking Facilities

The proposed project will provide a total of 124 vehicle parking spaces: 113 residential parking spaces at the subterranean levels and 11 commercial parking spaces at-grade level, with separate entrances to each. The project will also provide 122 bicycle parking spaces.

The at-grade commercial parking is located behind the commercial tenant spaces and as such will not be visible from the public right-of-way. Additionally, all ingress and egress will be from the public alley at the back of the building. Curb cuts and driveways along Pico Boulevard (designated Avenue I (Secondary Highway) and a Moderate Plus Transit Enhanced Street as shown in Mobility Plan 2035) were specifically avoided in order to reduce any impact on circulation in the surrounding area.

Therefore, the off-street parking facilities will be compatible with the existing and future developments in the neighborhood.

Loading Areas

The proposed project will include a loading area for pick-up and deliveries for the commercial uses at the back of the building along the alley, in conformance with the

L.A.M.C. Compliance with these regulations will allow the project to be compatible with existing and future development.

Lighting

Lighting for the proposed project has been conditioned through a mitigation measure to be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

Therefore, the lighting will be compatible with the existing and future developments in the neighborhood.

On-Site Landscaping

The project will provide a minimum of 10,325 square feet of open space, including, but not limited to, a 1,128 square-foot landscaped courtyard on the first floor, a 1,507 square-foot landscaped courtyard on the second floor and a 4,665 square-foot deck on the 4th floor that will contain a pool, a spa, seating areas and landscaping. Notably, the landscaping for the 4th floor deck will include medium-sized trees, further reducing the mass and bulk of the building as viewed from the south. A condition imposed requiring all planters containing trees to have a minimum depth of 48 inches to ensure adequate room for root growth and healthy trees.

Furthermore, the project will provide street trees as required by the Urban Forestry Division, Board of Public Works.

Therefore, the on-site landscaping will be compatible with the existing and future developments in the neighborhood.

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Trash Collection

The project will include centralized on-site trash collection for both refuse and recyclable materials, in conformance with the L.A.M.C. Compliance with these regulations will allow the project to be compatible with existing and future development.

Therefore, as proposed and conditioned, the project is compatible with existing and future development on neighboring properties.

- c. That any residential project provides recreational and service amenities in order to improve habitability for the residents and minimize impacts on neighboring properties.**

The proposed project will include 100 residential units and a minimum of 10,325 square feet of open space. The project will include three (3) Live/Work units, 58 studio apartments, 25 one-bedroom apartments, and 14 two-bedroom apartments.

The project, as proposed, will provide a minimum of 10,325 square feet of open space, including, but not limited to, a 1,128 square-foot courtyard, a 657 square-foot gym and a 877 square-foot recreation room on the first floor, a 1,507 square-foot courtyard on the second floor and a 4,665 square-foot deck on the 4th floor which will contain a pool, a spa, seating areas, a dog-wash station, a fire pit and landscaping, which will enhance habitability for the residents.

The project could reduce the amount of parking by 17, consistent with the bicycle parking reduction allowance, however has elected not to, thereby ensuring more than adequate on-site parking and relieving the burden on on-street parking in the surrounding area.

Therefore, as proposed, the project is compatible with existing and future development on neighboring properties.

5. Environmental Findings

- a. Environmental Finding.** On October 1, 2015, a Mitigated Negative Declaration (ENV-2015-2210-MND) was prepared for the proposed project. On the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that there is no substantial evidence that the proposed project will have a significant effect on the environment. The attached Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Environmental Review Section of the Department of City Planning in Room 750, 200 North Spring Street.
- b. Flood Insurance.** The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located outside of a Flood Zone.

PUBLIC HEARING AND COMMUNICATIONS

A public hearing was conducted on October 7, 2015, at 3:30 p.m., at City Hall in Downtown, Los Angeles.

1. Attendees

The hearing was attended by approximately 10 people, including the applicant, the applicant's representatives, members from the public and the Director of Planning for Council District 11.

2. Testimony - Oral

- a. Jonathan Lonner, the applicant's representative, presented the project. Through discussions with the City, the community and implementation of the West Pico Boulevard CDO, it was determined the type of project for this area was a mixed-use building, not 100% residential. Such a type of development is consistent with prior approvals in the area as well as proper in location given the availability of public transit.

In proposing the development at this location, several provisions apply which would limit the project's ability to construct the additional units permitted under the Density Bonus Ordinance, as well as the nine (9) affordable units being proposed.

The project has been designed with great attention to activating ground floor, including along the "Pedestrian Walk Street". Further attention has been given to ensure compliance with the West Pico Boulevard CDO through articulation above the ground floor and landscaping in the public right-of-way.

- b. Eric Hsu Erb, a neighbor, spoke in opposition of the project. Specifically, the project is out of scale for the neighborhood and does not comply with the Community Plan or the Community Design Overlay. The use of the public alley for access to the project site would result in the excessive traffic and traffic hazard in the alley and a traffic hazard at the Bundy Avenue/10 Freeway northbound off-ramp.
- c. Tricia Keane, Director of Planning for Council District 11, recognizes the concerns of the community and would like the applicant to address those concerns with modifications to the project prior to going to the City Planning Commission.
- d. In follow up testimony, Jonathan Lonner stated that the applicant is committed to working with the community to make changes to the project to address the concerns of the community.

The project complies with the CDO by providing a mixed-use development and is consistent with the provisions of the Density Bonus Ordinance. Use of the alley is preferred for ingress and egress to the project site, consistent with City guidelines.

3. Testimony - Written

Support

- a. On March 23, 2016, the West Los Angeles Sawtelle Neighborhood Council submitted a letter in support of the proposed project with the revisions made by the applicant, including the following:

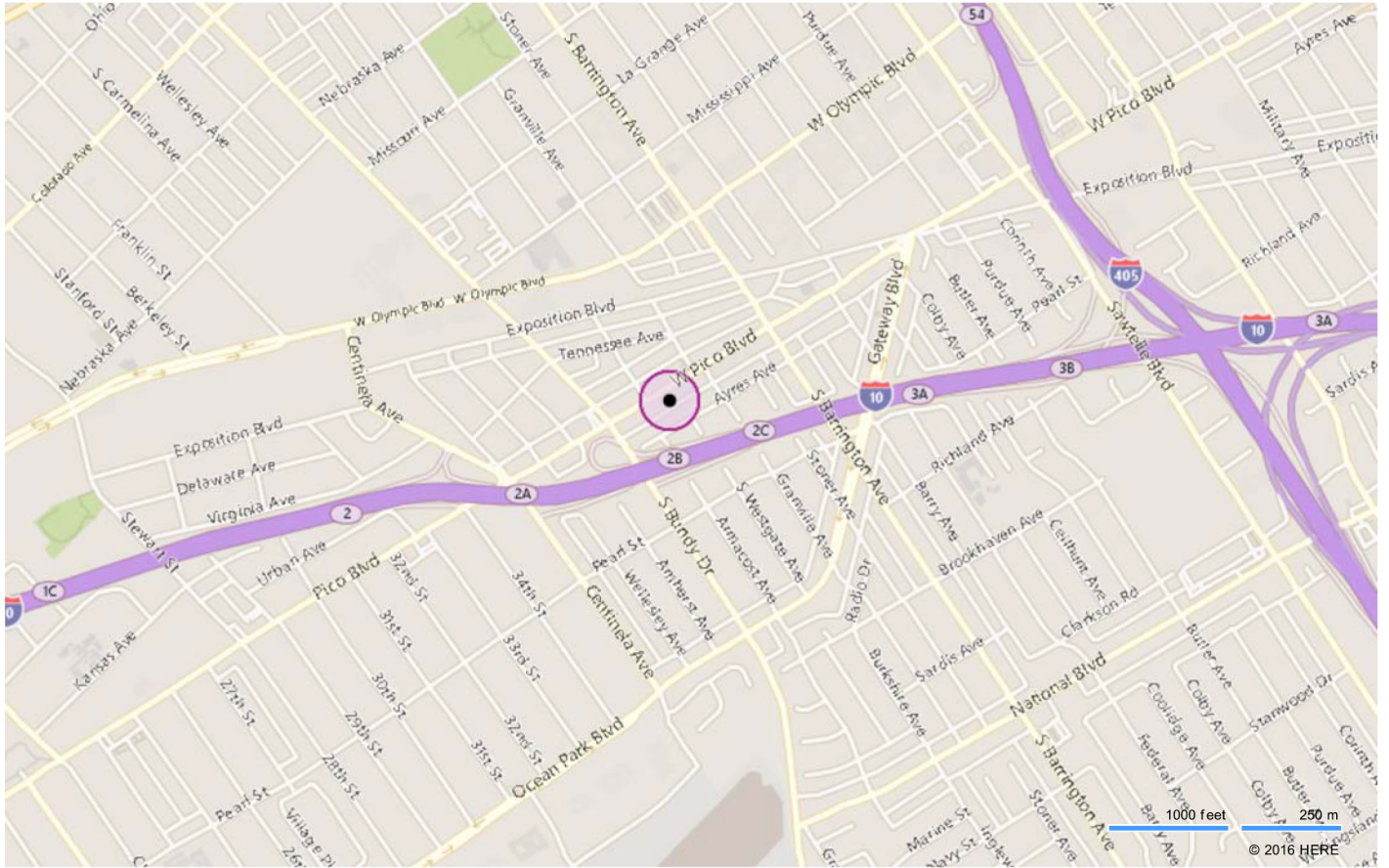
- i. The applicant has agreed to reduce the height of the structure in the rear to no more than 37 feet to the top of the parapet.
 - ii. The applicant worked diligently with the community to rework the open space so that it was utilized effectively to break up the massing in the rear of the project. While we are very sensitive to noise issues with decks in our area, this was at the request of the neighbors and we, therefore, support it.
 - iii. The applicant agreed to lush landscaping and planters which would provide a buffer to the adjacent neighbors which we believe is critical in the open space areas.
 - iv. The applicant agreed to work with LADOT and the Council Office to red curb the entrance to the alley to provide a better visibility triangle as well as to resurface the entire length of the alley from Granville Avenue to Bundy Drive which is greatly needed.
- b. 5 form letters in support were submitted.

Opposition

- c. On January 17, 2016 Eric Hsu Erb, a neighbor, submitted an email in opposition which stated the following:
- i. Violates Community Design Overlay District plan for West Pico Blvd in terms of height;
 - ii. It will set a precedent for the entire Pico Blvd. area from the 10 freeway to the 405;
 - iii. It is not set back enough from the neighborhood per current overlay district guidelines
 - iv. It is in direct contradiction to the existing West LA Community Plan that also outlines limits on height, stories and scale in relation to the surrounding area;
 - v. Traffic entrance into the alley poses a direct public safety hazard and should NOT be allowed to occur for this scale of project;
 - vi. The alley connects to the Bundy North Off-ramp and will pose a public safety hazard;
 - vii. The overall traffic in the area will be increased negatively;
 - viii. There is not adequate parking to accommodate this volume of units and retail;
 - ix. Privacy and noise level concerns with a 5 story, 56 foot height building;
 - x. Not relocating the utility lines underground will be a very unsightly;
 - xi. The overall size of the development changes the character of the neighborhood; and
 - xii. Pollution is controlled for health and safety for the 100 units within about 500' of the 10 freeway.
- d. 45 form letters in opposition were submitted.

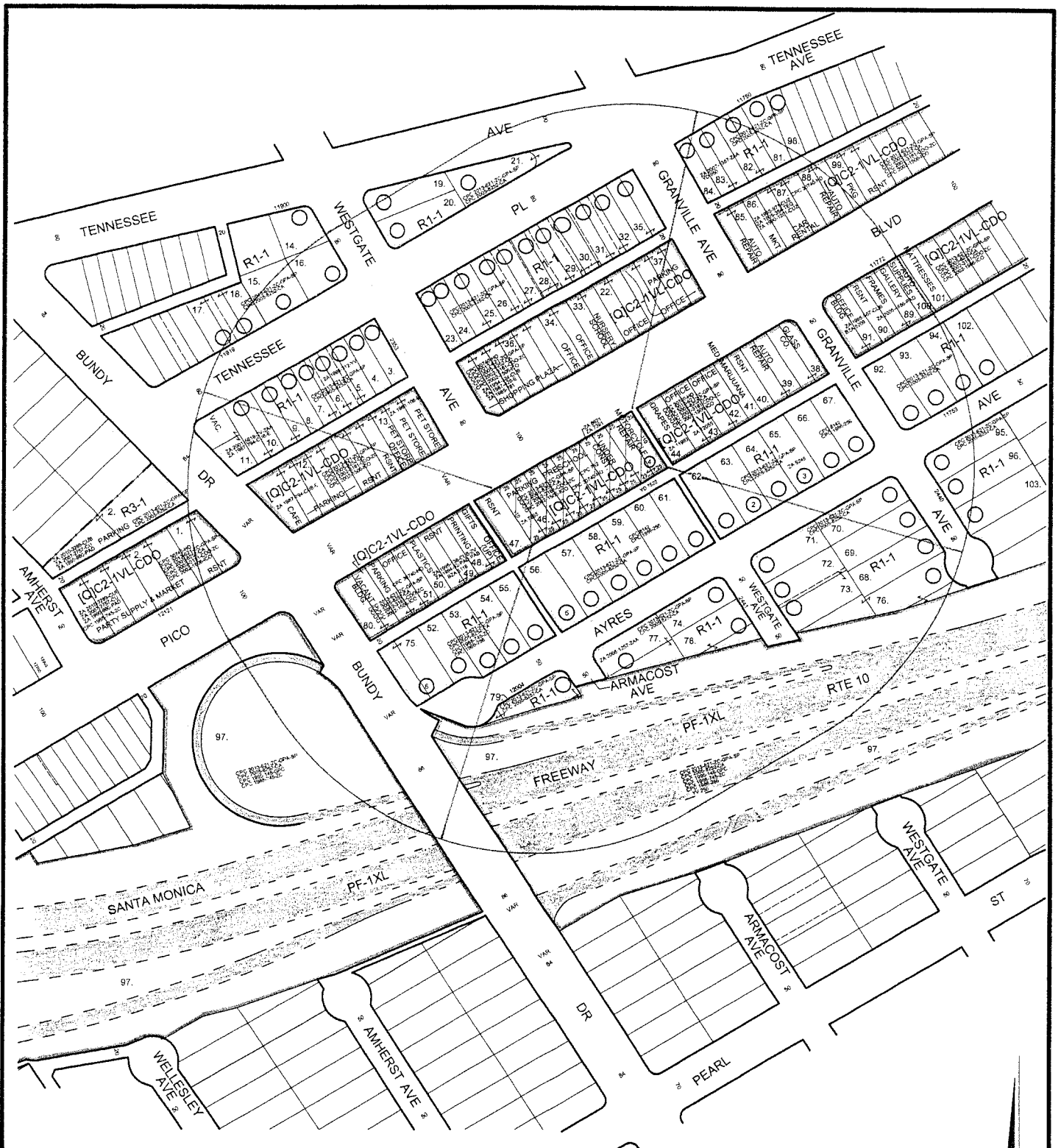
Map 1

Vicinity Map



Map 2

Radius Map



**DENSITY BONUS
SITE PLAN REVIEW**

LEGAL: LOTS 18-27, TRACT NO. 7861.

CPC 201 - 2209

C.D. 11
C.T. 2712.00
P.A. PALMS-MAR VISTA-DEL REY



GC MAPPING SERVICE, INC.

3055 WEST VALLEY BOULEVARD
ALHAMBRA CA 91803
(626) 441-1080 FAX (626) 441-8850

0.63 NET AC.

CASE NO.
DATE: 05-28-2015
SCALE: 1" = 100'
USES FIELD
D.M. 123 B 149,
120 B 149
T.B. PAGE: 632 GRID: A-7

Exhibit A

**Site Plan, Floor Plans,
Elevations and
Landscape Plan**



1625 OLYMPIC BOULEVARD
 SANTA MONICA, CA 90404
 310.399.7975
 KFALOSANGELES.COM

AMOROSO ON PICO

11916 WEST PICO BOULEVARD
 LOS ANGELES, CA 90064

ADC REAL ESTATE GROUP, LTD.
 27200 AGOURA ROAD, SUITE 201
 CALABASAS, CA 91301

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ENTITLEMENT SET

JOB NUMBER:
 14054
 DATE:
 1.7.2016

SHEET TITLE:
COVER SHEET

SHEET NUMBER:
0000



1625 OLYMPIC BOULEVARD
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ADC REAL ESTATE GROUP, LTD.
2720 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301

ENTITLEMENT SET
JOB NUMBER:
14054
DATE:
1.7.2016

PROJECT INFORMATION

001

PROJECT INFORMATION	
PROJECT NAME:	AMOROSO ON PICO
ADDRESS:	11916 WEST PICO BOULEVARD LOS ANGELES, CA 90064
OWNER:	ADC REAL ESTATE GROUP, LTD. 2720 AGOURA ROAD, SUITE 201 CALABASAS, CA 91301
PROJECT DESCRIPTION:	5-STORY MIXED-USE RESIDENTIAL APARTMENT BUILDING WITH GROUND FLOOR RETAIL, OVER 2 LEVELS OF SUBTERRANEAN PARKING GARAGE
CONSTRUCTION TYPE:	4 STORES TYPE-V OVER 1 STORY ABOVE-GRADE TYPE-I PODIUM, OVER 2 STORES TYPE-I SUBTERRANEAN GARAGE
ZONING:	(Q) C2-1VL-CDO
FLOOD ZONE:	X (NONE)
SITE AREA:	27,493 SF (PER SURVEY)
SET BACKS:	FRONT YARD: 0'-0" SETBACK (C2 ZONE) SIDE YARD: 5' + 1" FOR EACH STORY OVER REAR YARD: 15' + 1" FOR EACH STORY OVER 3RD FLOOR = 17'-0" *REAR YARD INCLUDES 1/2 ALLEY (PER 12.22 C.10)
ALLOWABLE DENSITY:	LOT AREA = SITE AREA + 1/2 OF ADJACENT SOUTH ALLEY (PER SURVEYOR) PER LAMC 12.22 C.16 HIGHWAY DEDICATION INCLUDED IN BUILDING AREA PER LAMC 12.37 G LOT AREA / 400 SF/D.U. = (27,493 + 2,501)/400 = 74.9 (ROUND DOWN) = 74 UNITS x 1.35 (D.B) = 99.9 (ROUND UP) = 100 UNITS
PROPOSED UNITS:	100
ALLOWABLE BLDG HEIGHT:	MAX BLDG HT FROM LOWEST POINT 5' FROM BLDG WITHIN 50' OF R1 ZONE: = 45' (PER C2-1VL HEIGHT DISTRICT) BEYOND 50' OF R1 TRANSITIONAL HT BOUNDARY: = 45' + 11' (PER DENSITY BONUS) = 56'-0" (PER LAMC 12.21.1B2)
PROPOSED BLDG HEIGHT:	45'-0" WITHIN 50' OF R1 ZONE; 56'-0" BEYOND TRANSITIONAL HEIGHT BOUNDARY
OCCUPANCY TYPE:	S2, A3, M, R2
LIVE/WORK UNIT CONDITIONS:	WILL NOT BE OPEN TO THE GENERAL PUBLIC. WILL NOT BE USED FOR INSTRUCTIONAL CLASSES, NOR WILL IT BE USED FOR RETAIL PURPOSES. THERE WILL BE NO EMPLOYEES WORKING IN THESE UNITS.



LEGAL DESCRIPTION

PARCEL 1: LOTS 18 AND 19 OF TRACT NO. 7861, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 90, PAGES 27 AND 28 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 2: LOTS 20, 21, 22, 23, 24, 25, 26, AND 27 OF TRACT NO. 7861, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 90, PAGES 27 AND 28 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4259-039-008 and 4259-039-009 and 4259-039-010 and 4259-039-011

UNIT COUNT

Unit Type	LEVEL	QTY
1 BR	1ST FLOOR	2
LIVE / WORK	1ST FLOOR	3
STUDIO	1ST FLOOR	5
		10
1 BR	2ND FLOOR	6
2 BR	2ND FLOOR	3
STUDIO	2ND FLOOR	18
		27
1 BR	3RD FLOOR	5
2 BR	3RD FLOOR	4
STUDIO	3RD FLOOR	18
		27
1 BR	4TH FLOOR	6
2 BR	4TH FLOOR	3
STUDIO	4TH FLOOR	9
		18
1 BR	5TH FLOOR	6
2 BR	5TH FLOOR	3
STUDIO	5TH FLOOR	9
		18
Grand total		100

ZONING DATA

GROSS LOT SIZE: 27,493 (PER SURVEY)

ALLOWABLE UNIT COUNT: SEE PROJECT INFORMATION

UNITS PROPOSED: 100 - SEE PROJECT INFORMATION

ALLOWABLE BLDG HEIGHT: 56'-0" - SEE PROJECT INFORMATION

PROPOSED BLDG HEIGHT: 56'-0" - SEE PROJECT INFORMATION

SETBACKS: FRONT YARD: 0'-0" SETBACK (C2 ZONE)
SIDE YARD: 5' + 1" FOR EACH STORY OVER
REAR YARD: 15' + 1" FOR EACH STORY OVER
3RD FLOOR = 17'-0"

*REAR YARD INCLUDES 1/2 ALLEY (PER 12.22 C.10)

BUILDING CODES USED

2014 CALIFORNIA BUILDING CODE (CBC), PART 2, TITLE 24 C.C.R. AND AMENDMENTS

2014 CALIFORNIA ELECTRICAL CODE (CEC), PART 3, TITLE 24 C.C.R. AND AMENDMENTS

2014 CALIFORNIA MECHANICAL CODE (CMC), PART 4, TITLE 24, C.C.R. AND AMENDMENTS

2014 CALIFORNIA PLUMBING CODE (CPC), PART 5, TITLE 24, C.C.R. AND AMENDMENTS

2014 CALIFORNIA FIRE CODE (FC), PART 9, TITLE 24, C.C.R. AND AMENDMENTS

2014 CALIFORNIA REFERENCED STANDARDS CODE, PART 12, TITLE 24 C.C.R.

2014 CALIFORNIA GREEN BUILDING CODE, TITLE 24, PART 6

DENSITY BONUS

PARKING: OPTION 1

% AFFORDABILITY: 11% VERY LOW (OF 74 BASE UNITS)

OF AFFORDABLE UNITS: 9

DENSITY BONUS: 35%

ON-MENU INCENTIVES: FAR INCREASE TO 3.1

OFF-MENU INCENTIVES: 11' HEIGHT INCREASE FROM 45' TO 56'

PROJECT TEAM

OWNER: ADC REAL ESTATE GROUP, LTD.
2720 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301
818.871.2920
CONTACT: JASON AMOROSO

SURVEYOR: DASK LAND SURVEYING
960 RANCHEROS DRIVE, SUITE 201
SAN MARCOS, CA 92069
760.740.1383
CONTACT: SOLOMON HANDY

ARCHITECT: KILLEFER FLAMMANG ARCHITECTS
1625 OLYMPIC BOULEVARD
SANTA MONICA, CA 90404
310.399.1975 x251
CONTACT: ANDREA URMANTITA

LANDSCAPE ARCHITECT: HERMANN DESIGN GROUP
77-899 WOLF ROAD, SUITE 102
PALM DESERT, CA 92211
760.777.9131
CONTACT: CHRIS HERMANN

OPEN SPACE

REQUIRED OPEN SPACE PER LAMC 12.21 G:
100 SF/UNIT FOR < 3 HABITABLE ROOMS (STUDIOS, LIVE/WORK, & 1 BR UNITS)
125 SF/UNIT FOR > 3 HABITABLE ROOMS (2 BR UNITS)

REQUIRED

UNIT TYPE	# OF UNITS	REQ'D OPEN SPACE
1 BR	25	2500 SF
2 BR	13	1625 SF
LIVE / WORK	3	300 SF
STUDIO	59	5900 SF
Grand total:	100	10325 SF

PROVIDED

NAME	LEVEL	AREA (SF)
COMMON OPEN SPACE: GYM	1ST FLOOR	657
COMMON OPEN SPACE: REC ROOM	1ST FLOOR	877
COURTYARD	1ST FLOOR	1128
PRIVATE OPEN SPACE	1ST FLOOR	200
COURTYARD	2ND FLOOR	1507
PRIVATE OPEN SPACE	2ND FLOOR	50
PRIVATE OPEN SPACE	3RD FLOOR	100
COMMON OPEN SPACE: REC ROOM	4TH FLOOR	697
COMMON ROOF DECK	4TH FLOOR	4665
COMMON ROOF DECK	5TH FLOOR	444
Grand total		10325

SEE ALSO SHEET G021 & LANDSCAPE PLAN

A KITCHEN IS NOT CONSIDERED A HABITABLE ROOM FOR PURPOSES OF CALCULATING OPEN SPACE.

PER LAMC 12.21 G.2 (a)(1)(ii) COMMON OPEN SPACE MUST HAVE A MINIMUM AREA OF 400 SF WITH NO HORIZONTAL DIMENSION LESS THAN 15' WHEN MEASURED PERPENDICULAR FROM ANY POINT ON EACH OF THE BOUNDARIES.

PER LAMC 12.21 G.2 (a)(4)(i) RECREATION ROOMS MUST BE AT LEAST 600 SF FOR DEVELOPMENT OF 16+ DWELLING UNITS AND MUST NOT EXCEED 25% OF TOTAL REQUIRED OPEN SPACE.

PERCENT OF LANDSCAPED OPEN SPACE
LANDSCAPED OPEN 25%.

FAR CALCULATIONS

FAR MEASUREMENT PER LAMC 12.03
AREA IN SQUARE FEET CONFINED WITHIN THE EXTERIOR WALLS OF A BUILDING, BUT NOT INCLUDING THE AREA OF THE FOLLOWING:
EXTERIOR WALLS, STAIRWAYS, SHAFTS, ROOMS HOUSING BUILDING EQUIPMENT OR MACHINERY, PARKING AREAS WITH ASSOCIATED DRIVEWAYS AND RAMPS, SPACE FOR THE LANDING AND STORAGE OF HELICOPTERS, AND BASEMENT STORAGE AREAS.

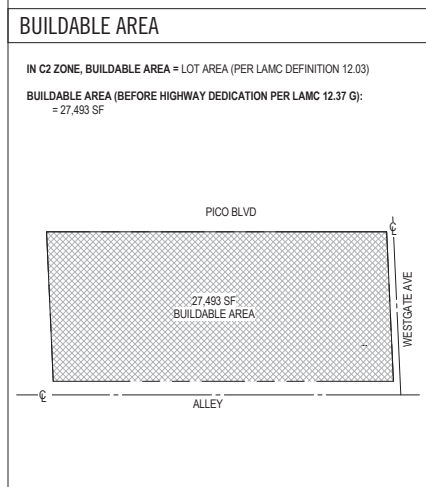
LOT AREA:
27,493 SF (PER SURVEY)

ALLOWABLE FAR:
= 1.5:1 BASE FAR (PER C2-1VL ZONE)
= 3.1 MAX ALLOWABLE FAR (DENSITY BONUS)

= BUILDABLE AREA X 3
= 27,493 SF X 3 = 82,479 SF

LEVEL	FAR	AREA (SF)
1ST FLOOR	COMMERCIAL	3023
		3023
1ST FLOOR	RESIDENTIAL	12496
2ND FLOOR	RESIDENTIAL	17467
3RD FLOOR	RESIDENTIAL	17467
4TH FLOOR	RESIDENTIAL	13503
5TH FLOOR	RESIDENTIAL	14508
Grand total		78484

FAR PROVIDED:
= TOTAL AREA / BUILDABLE AREA
= 78,484 SF / 27,493 SF = 2.9



PARKING - RETAIL

REQUIRED RETAIL PARKING PER LAMC 12.21 A.4(c)(4)(5):
SMALL RESTAURANT: 1 SPACE PER 200 GROSS SF
GENERAL RETAIL: 1 SPACE PER 250 GROSS SF

REQUIRED RETAIL PARKING			
NAME	TENANT	SF	REQ'D PARKING
RETAIL_1	SMALL RESTAURANT	1000 SF	5
RETAIL_2	GENERAL RETAIL	1625 SF	6
Grand total:			11

Grand total: 11
*DINING ESTABLISHMENT WITH GROSS FLOOR AREA OF 1,000 SF OR LESS

PROVIDED RETAIL PARKING			
1ST FLOOR			
(1) STANDARD	COMMERCIAL	6	
(2) COMPACT	COMMERCIAL	3	
(3) ACCESSIBLE	COMMERCIAL	2	
Grand total		11	

11 COMMERCIAL SPACES INCLUDES 1 ACCESSIBLE VAN SPACE PER CBC SECTION 1129B.3 & TABLE 11B-6

PARKING - RESIDENTIAL

REQUIRED RESIDENTIAL PARKING PER DENSITY BONUS ORDINANCE PARKING OPTION 1:
1 SPACE < 3 HABITABLE ROOMS (STUDIOS)
1 SPACE = 3 HABITABLE ROOMS (1 BR UNITS)
2 SPACE > 3 HABITABLE ROOMS (2 BR UNITS)

UNIT TYPE	# OF UNITS	REQ'D PARKING STALLS
1 BR	25	25
2 BR	13	26
LIVE / WORK	3	3
STUDIO	59	59
Grand total:	100	113

PER BIKE ORDINANCE REPLACEMENT PLAN:
UP TO 15% OF REQ'D AUTOMOBILE PARKING SPACES MAY BE REPLACED WITH BICYCLE PARKING:
.15 x 113 = 16.95 = (ROUND UP) 17 SPACES
TOTAL REQUIRED PARKING = 113 - 17 = 96 SPACES

PROVIDED RESIDENTIAL PARKING			
P1 LEVEL			
(1) STANDARD	RESIDENTIAL	36	
(2) COMPACT	RESIDENTIAL	8	
(3) ACCESSIBLE	RESIDENTIAL	3	
		47	
P2 LEVEL			
(1) STANDARD	RESIDENTIAL	52	
(2) COMPACT	RESIDENTIAL	4	
(4) TANDEM	RESIDENTIAL	10	
		66	
Grand total		113	

PER CBC 1109A.4, ACCESSIBLE PARKING SHALL BE PROVIDED FOR 2% OF ASSIGNED PARKING SPACES SERVING COVERED MULTIFAMILY DWELLING UNITS.
116 SPACES X 2% = 2.32 = 3 REQUIRED ACCESSIBLE STALLS (INCLUDES ONE VAN SPACE)

BIKE PARKING

REQUIRED RESIDENTIAL BIKE PARKING:
LONG-TERM: 1 PER UNIT = 1 x 100 = 100 SPACES
SHORT-TERM: 1 PER 10 UNITS = 1 x (100/10) = 10 SPACES

REQUIRED RETAIL BIKE PARKING:
LONG-TERM: 1 PER 2,000 SF
RETAIL 1: 1,000 SF / 2,000 = 0.5 SPACES
= MIN. 2 SPACES REQ'D PER BIKE ORD.
RETAIL 2: 1,625 SF / 2,000 = 0.81 SPACES
= MIN. 2 SPACES REQ'D PER BIKE ORD.
TOTAL = 4 LONG-TERM SPACES
SHORT TERM: 1 PER 2,000 SF
RETAIL 1: 1,000 SF / 2,000 = 0.5 SPACES
= MIN. 2 SPACES REQ'D PER BIKE ORD.
RETAIL 2: 1,500 SF / 2,000 = 0.75 SPACES
= MIN. 2 SPACES REQ'D PER BIKE ORD.
TOTAL = 4 SHORT-TERM SPACES + 4 ADD'L SPACES (PER BIKE ORDINANCE REPLACEMENT OPTION) = 8 SHORT-TERM SPACES

PROVIDED BIKE PARKING:

	RESIDENTIAL		RETAIL	
	REQ'D	PROVIDED	REQ'D	PROVIDED
LONG-TERM	100	100	4	4
SHORT-TERM	10	10	8	8



1625 OLYMPIC BOULEVARD
SANTA MONICA, CA 90404
310.399.7975
KFALOSANGELES.COM

AMOROSO ON PICO

11916 WEST PICO BOULEVARD
LOS ANGELES, CA 90064

ADC REAL ESTATE GROUP, LTD.
27200 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301

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ENTITLEMENT SET

JOB NUMBER:
14054
DATE:
1.7.2016

FAR CALCULATIONS

0202015004.PDF

NOTES

LOT AREA:
27,493 SF (PER SURVEY)

ALLOWABLE FAR:
= 1.5:1 BASE FAR (PER C2-1VL ZONE)
= 3:1 MAX ALLOWABLE FAR (DENSITY BONUS)
= BUILDABLE AREA X 3
= 27,493 SF X 3 = 82,479 SF

LEVEL	FAR	AREA (SF)
1ST FLOOR	COMMERCIAL	3023
		3023
1ST FLOOR	RESIDENTIAL	12496
2ND FLOOR	RESIDENTIAL	17467
3RD FLOOR	RESIDENTIAL	17487
4TH FLOOR	RESIDENTIAL	13503
5TH FLOOR	RESIDENTIAL	14508
Grand total		78484

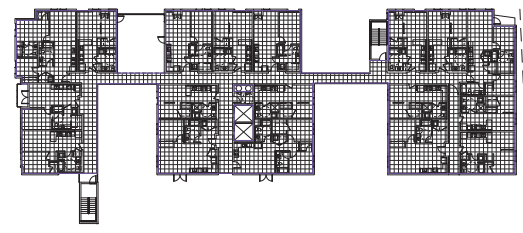
FAR PROVIDED:
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= 78,484 SF / 27,493 SF = 2.9

SHEET NOTES

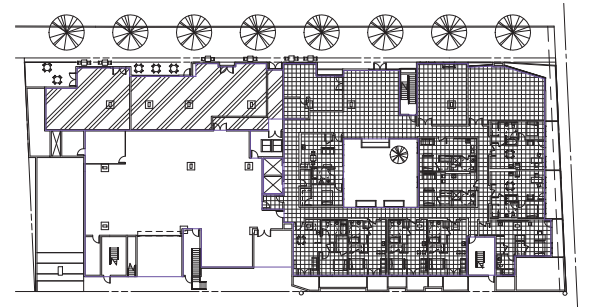
FAR MEASUREMENT PER LAMC 12.03.
AREA IN SQUARE FEET CONFINED WITHIN THE
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HOUSING BUILDING EQUIPMENT OR MACHINERY,
PARKING AREAS WITH ASSOCIATED DRIVEWAYS
AND RAMPS, SPACE FOR THE LANDING AND
STORAGE OF HELICOPTERS, AND BASEMENT
STORAGE AREAS.

LEGEND

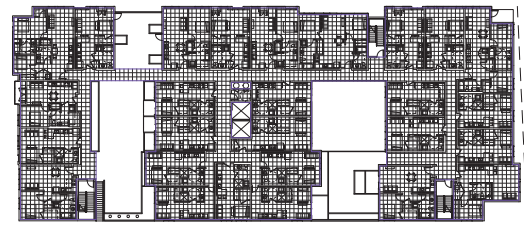
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-  RESIDENTIAL



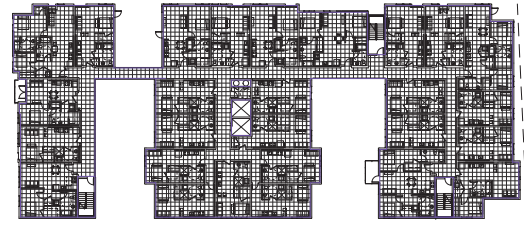
5TH FLOOR FAR PLAN
1/32" = 1'-0" 5



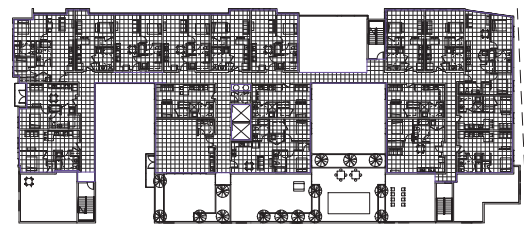
1ST FLOOR FAR PLAN
1/32" = 1'-0" 1



2ND FLOOR FAR PLAN
1/32" = 1'-0" 2



3RD FLOOR FAR PLAN
1/32" = 1'-0" 3



4TH FLOOR FAR PLAN
1/32" = 1'-0" 4



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ADC REAL ESTATE GROUP, LTD.
27200 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301

ENTITLEMENT SET
JOB NUMBER:
14054
DATE:
1.7.2016

OPEN SPACE CALCULATIONS

021
02021

NOTES

REQUIRED OPEN SPACE

UNIT TYPE	# OF UNITS	REQ'D OPEN SPACE
1 BR	25	2500 SF
2 BR	13	1625 SF
LIVE / WORK	3	300 SF
STUDIO	59	5900 SF
Grand total:	100	10325 SF

PROPOSED OPEN SPACE

NAME	LEVEL	AREA (SF)
COMMON OPEN SPACE: GYM	1ST FLOOR	657
COMMON OPEN SPACE: REC ROOM	1ST FLOOR	877
COURTYARD	1ST FLOOR	1128
PRIVATE OPEN SPACE	1ST FLOOR	200
COURTYARD	2ND FLOOR	1507
PRIVATE OPEN SPACE	2ND FLOOR	50
PRIVATE OPEN SPACE	3RD FLOOR	100
COMMON OPEN SPACE: REC ROOM	4TH FLOOR	697
COMMON ROOF DECK	4TH FLOOR	4665
COMMON ROOF DECK	5TH FLOOR	444
Grand total		10325

SHEET NOTES

OPEN SPACE REQUIREMENTS PER LAMC 12.21 G:

100 SF/UNIT < 3 HABITABLE ROOMS (STUDIO & 1 BR)
125 SF/UNIT = 3 HABITABLE ROOMS (2BR UNIT)

NOTE:

1. A KITCHEN IS NOT CONSIDERED A HABITABLE ROOM FOR PURPOSES OF CALCULATING OPEN SPACE.

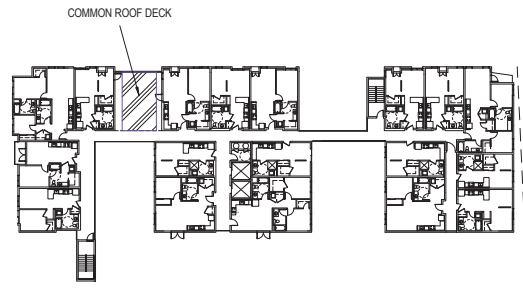
2. PER LAMC 12.21.G.2.(a)(1)(ii) COMMON OPEN SPACE MUST HAVE A MINIMUM AREA OF 400 SF WITH NO HORIZONTAL DIMENSION LESS THAN 15' WHEN MEASURED PERPENDICULAR FROM ANY POINT ON EACH OF THE BOUNDARIES.

3. PER LAMC 12.21.G.2.(a)(4)(i) RECREATION ROOMS MUST BE AT LEAST 600 SF FOR DEVELOPMENT OF 16+ DWELLING UNITS AND MUST NOT EXCEED 25% OF TOTAL REQUIRED OPEN SPACE.

PERCENT OF LANDSCAPED OPEN SPACE
LANDSCAPED OPEN 25%.

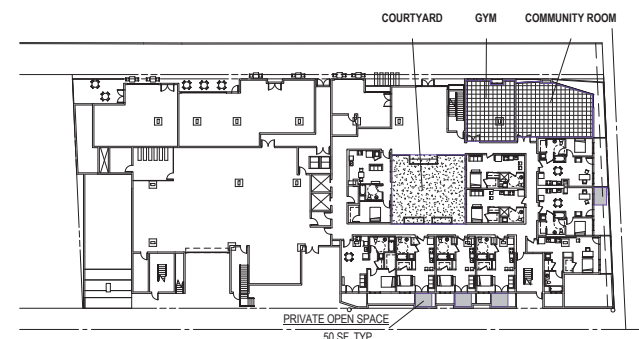
LEGEND

- COURTYARD
- COMMON OPEN SPACE: GYM
- COMMON OPEN SPACE: REC ROOM
- COMMON ROOF DECK
- PRIVATE OPEN SPACE



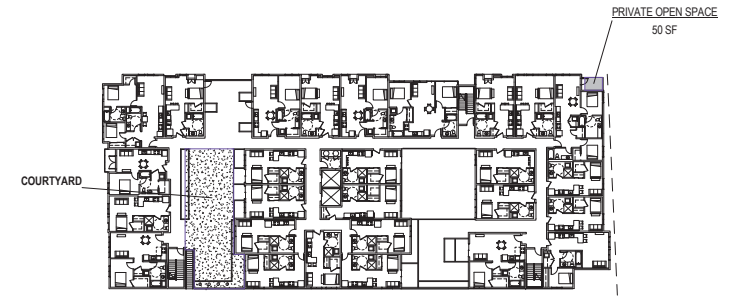
5TH FLOOR OPEN SPACE PLAN
1/32" = 1'-0"

5



1ST FLOOR OPEN SPACE PLAN
1/32" = 1'-0"

1



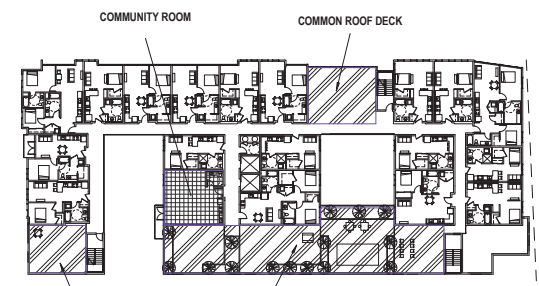
2ND FLOOR OPEN SPACE PLAN
1/32" = 1'-0"

2



3RD FLOOR OPEN SPACE PLAN
1/32" = 1'-0"

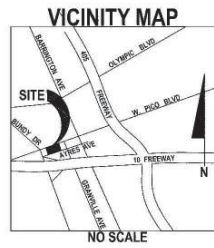
3



4TH FLOOR OPEN SPACE PLAN
1/32" = 1'-0"

4

A.L.T.A. / A.C.S.M. LAND TITLE SURVEY



SITE ADDRESS: 11900 - 11916 WEST PICO BOULEVARD, LOS ANGELES, CA.
PROPERTY AREA: 0.631 ACRES (27,493 SQ. FT.)
ZONE: C-2-1VL-CDO (COMMERCIAL)
TOTAL PARKING: 28 SPACES (NO HANDICAP SPACES)
FLOOD ZONE: X MAP NO.: 060 37C 1590F DATED: 9 / 26 / 2008
"SAID PROPERTY DOES NOT LIE WITHIN A FEMA DESIGNATED 100-YR FLOOD PLAIN"

FLOOD ZONE NOTE:
 BASED ON THE US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, FEDERAL INSURANCE ADMINISTRATION FLOOD HAZARD BOUNDARY MAP, COMMUNITY NUMBER 809 37C, SHEET NUMBER 1590F, DATED: 9 / 26 / 2008, THE SUBJECT PROPERTY IS NOT LOCATED IN A SPECIAL FLOOD HAZARD AREA ACCORDING TO THE MAP.

LEGAL DESCRIPTION:

Real property in the City of Los Angeles, County of Los Angeles, State of California, described as follows:

PARCEL 1:
 LOTS 19 AND 19 OF TRACT NO. 7861, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 90, PAGES 27 AND 28 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 2:
 LOTS 20, 21, 22, 23, 24, 25 AND 27 OF TRACT NO. 7861, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 90, PAGES 27 AND 28 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4259-039-008 and 4259-039-009 and 4259-039-010 and 4259-039-011

ASSURANCE NOTE:

THE FOREGOING LEGAL DESCRIPTION DESCRIBES THE SAME PROPERTY DESCRIBED IN PRELIMINARY TITLE REPORT ORDER NO. 134674, BEARING AN EFFECTIVE DATE OF MARCH 5, 2015 AS PREPARED BY NORTH AMERICAN TITLE COMPANY.

EXCEPTION NOTES:

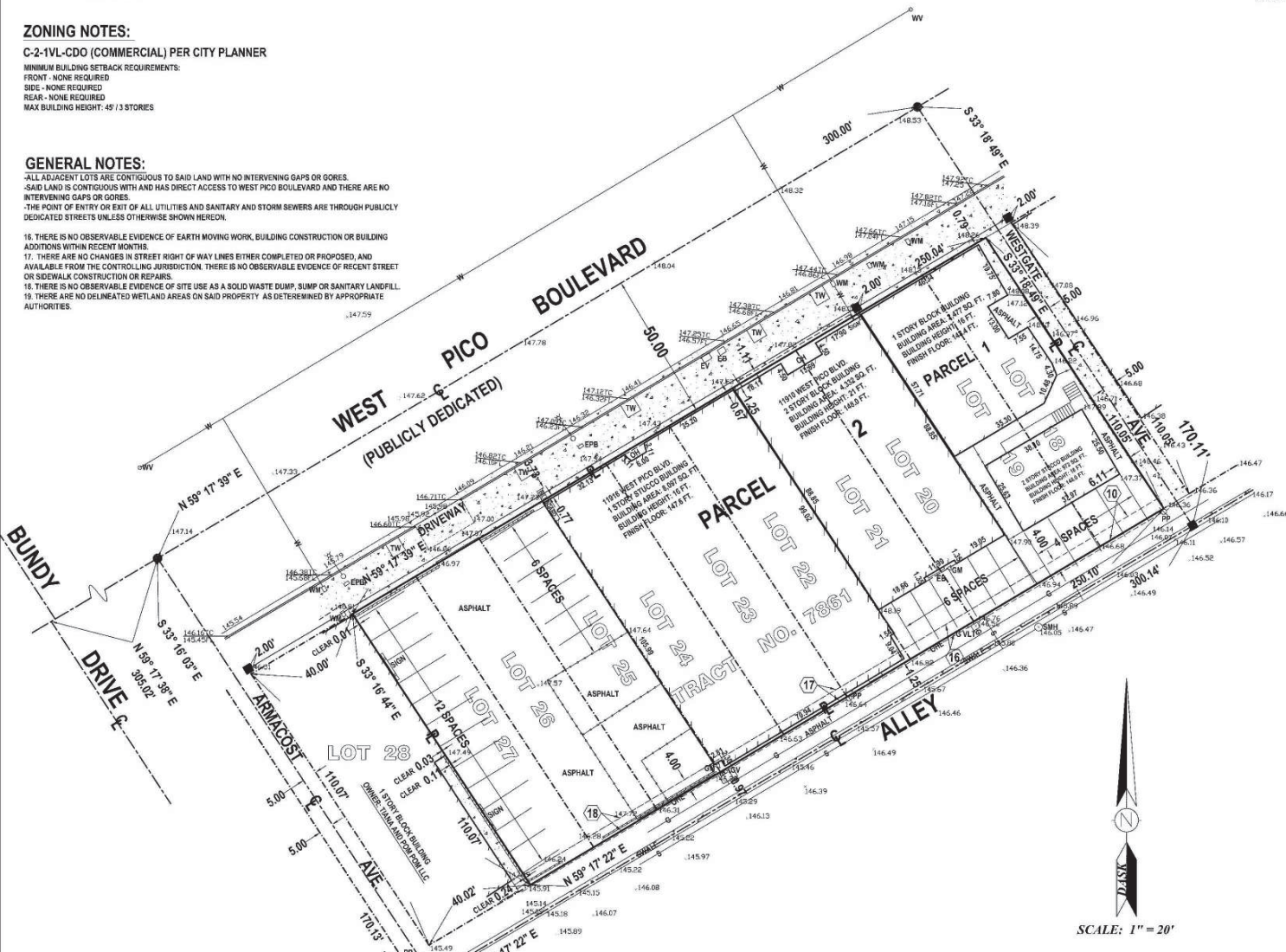
- PER: NORTH AMERICAN TITLE COMPANY
 ORDER NO.: 1345674
 DATED: MARCH 5, 2015
- The Following Matters Affect Parcel 1:
- (10) An easement for pole lines and incidental purposes, recorded as Book 10304, Page 202 of Official Records. In Favor of: Bank of America of California. Affects: The rear 4 feet.
 - "SAID ITEM AFFECTS SAID PROPERTY AND IS SHOWN HEREON."
 - (12) The terms and provisions contained in the document entitled "Covenant and Agreement", executed by and between Don Rio and Madeline Rio and The City of Los Angeles, a corporation, recorded January 17, 1955, as Book 46656, Page 290 of Official Records. "SAID ITEM AFFECTS SAID PROPERTY BUT CAN NOT BE PLOTTED."
- The Following Matters Affect Parcel 2:
- (14) An easement for public utilities and incidental purposes, recorded Prior to February 15, 1950 as Book 19937, Page 202 and Book 19937, Page 204, both of Official Records. In Favor of: Hollman Commercial Trust and Savings Bank. Affects: The rear 4 feet of Lot 21.
 - "SAID ITEM AFFECTS SAID PROPERTY AND IS SHOWN HEREON."
 - (17) An easement for pole lines and incidental purposes, recorded February 15, 1950 as Book 5506, Page 47 of Official Records. In Favor of: Hollman Commercial Trust and Savings Bank. Affects: The rear 4 feet of Lots 22, 23 and 24.
 - "SAID ITEM AFFECTS SAID PROPERTY AND IS SHOWN HEREON."
 - (18) An easement for public utilities and incidental purposes, recorded February 15, 1950 as Book 5506, Page 47 of Official Records. In Favor of: Hollman Commercial Trust and Savings Bank. Affects: The rear 4 feet of Lots 25, 26 and 27.
 - "SAID ITEM AFFECTS SAID PROPERTY AND IS SHOWN HEREON."
 - (19) The terms and provisions contained in the document entitled "Covenant and Agreement" recorded April 17, 1950 as Instrument No. 80-30837 of Official Records. "SAID ITEM AFFECTS SAID PROPERTY BUT CAN NOT BE PLOTTED."
 - (20) The terms and provisions contained in the document entitled "Affidavit to Devote Building to Less Fire-Resistive Type Classification", executed by and between Shirley Gold, and Saul Levine and The City of Los Angeles, recorded February 11, 2004, as Instrument No. 2004-311631 of Official Records. "SAID ITEM AFFECTS SAID PROPERTY BUT CAN NOT BE PLOTTED."
 - (21) The terms and provisions contained in the document entitled "Covenant and Agreement", executed by and between Gold Family Trust, and Levine Family Trust and The City of Los Angeles, recorded February 11, 2004, as Instrument No. 2004-311632 of Official Records. "SAID ITEM AFFECTS SAID PROPERTY BUT CAN NOT BE PLOTTED."
 - (22) An agreement or covenant to hold land as one parcel recorded February 2, 2004 as Instrument No. 2004-231758 of Official Records. "SAID ITEM AFFECTS SAID PROPERTY BUT CAN NOT BE PLOTTED."

ZONING NOTES:
 C-2-1VL-CDO (COMMERCIAL) PER CITY PLANNER

MINIMUM BUILDING SETBACK REQUIREMENTS:
 FRONT - NONE REQUIRED
 SIDE - NONE REQUIRED
 REAR - NONE REQUIRED
 MAX BUILDING HEIGHT: 45 / 3 STORIES

GENERAL NOTES:
 - ALL ADJACENT LOTS ARE CONTIGUOUS TO SAID LAND WITH NO INTERVENING GAPS OR GORES.
 - SAID LAND IS CONTIGUOUS WITH AND HAS DIRECT ACCESS TO WEST PICO BOULEVARD AND THERE ARE NO INTERVENING GAPS OR GORES.
 - THE POINT OF ENTRY OR EXIT OF ALL UTILITIES AND SANITARY AND STORM SEWERS ARE THROUGH PUBLICLY DEDICATED STREETS UNLESS OTHERWISE SHOWN HEREON.

16. THERE IS NO OBSERVABLE EVIDENCE OF EARTH MOVING WORK, BUILDING CONSTRUCTION OR BUILDING ADDITIONS WITHIN RECENT MONTHS.
 17. THERE ARE NO CHANGES IN STREET RIGHT OF WAY LINES EITHER COMPLETED OR PROPOSED, AND AVAILABLE FROM THE CONTROLLING JURISDICTION. THERE IS NO OBSERVABLE EVIDENCE OF RECENT STREET OR SIDEWALK CONSTRUCTION OR REPAIRS.
 18. THERE IS NO OBSERVABLE EVIDENCE OF SITE USE AS A SOLID WASTE DUMP, SUMP OR SANITARY LANDFILL.
 19. THERE ARE NO DELINEATED WETLAND AREAS ON SAID PROPERTY AS DETERMINED BY APPROPRIATE AUTHORITIES.



LEGEND

- BUILDING LINE
- PROPERTY LINE
- CENTERLINE
- EASEMENT LINE
- LOT LINE
- STREET LIGHT
- FENCE LINE
- WALL LINE
- CONCRETE AREA
- POWER POLE
- TREEWELL
- LANDSCAPED AREA
- WATER VALVE
- WATER METER
- ELECTRIC VAULT
- ELECTRIC PULL-BOX
- SEWER MANHOLE
- ELECTRIC BOX
- OVERHANG
- GAS VAULT
- GAS METER
- GAS VALVE
- FOUND "PK" NAIL
- FOUND LEAD & TACK
- OVERHEAD ELECTRIC LINE
- GAS LINE
- SEWER LINE
- WATER LINE
- SPOT ELEVATION
- TOP OF CURB
- FLOW LINE

BENCHMARK:

CITY OF LOS ANGELES VERTICAL CONTROL DATUM
 BENCHMARK ID #02711 / YEAR 1985
 DESCRIPTION: SPIKE NORTH CURB PICO BOULEVARD 28.8 FEET WEST OF BIR BUNDY DRIVE WEST END CATCH BASIN
 I.E. ELEVATION: 145.026 FEET NGVD 1929

SURVEYORS CERTIFICATE

To: Comerica Bank, its affiliates and their respective successors and/or assigns; South Gate Investors III, LLC and North American Title Company.

This is to certify that this map or plat and the survey on which it is based were made in accordance with the 2011 Minimum Standard Detail Requirements for ALTA/ACSM Land Title Surveys, jointly established and adopted by ALTA and NSPS, and includes Items 1, 2, 3, 4, 5, 6(b), 7(a), 7(b)(1), 7(c), 8, 9, 10(a), 11(b), 12, 14, 16, 17, 18, 19, 20(a) and 21 (\$2,000,000) of Table A thereof. The field work was completed on MARCH 13, 2015.

Date of Plat or Map: MARCH 24, 2015.

Solomon S. Handy
 SOLOMON S. HANDY
 REGISTRATION NUMBER: LS 7584
 DATED: MARCH 24, 2015
 DATE OF LAST REVISION: MARCH 31, 2015
 DASK Land Surveying
 960 Rancheros Drive, San Marcos, CA
 Tel.: 760.740.1383 / Email: SHANDY@DASKLS.COM
 JN-32-065-14T



DASK LAND SURVEYING
 DASK LAND SURVEYING
 960 RANCHEROS DRIVE, SUITE J
 SAN MARCOS, CA 92069
 PHONE: 760-740-1383
 FAX: 760-740-1384

REVISED: MARCH 31, 2015
 JOB NO. 32-065-14T

AMOROSO ON PICO
 11916 WEST PICO BOULEVARD
 LOS ANGELES, CA 90064

ADC REAL ESTATE GROUP, LTD.
 27200 AGOURA ROAD, SUITE 201
 CALABASAS, CA 91301

ENTITLEMENT SET
 JOB NUMBER:
 14054
 DATE:
 1.7.2016
 SHEET NO.:

SHEET TITLE:
TOPOGRAPHIC SURVEY

SHEET NUMBER:
G030



1625 OLYMPIC BOULEVARD
SANTA MONICA, CA 90404
310.399.7975
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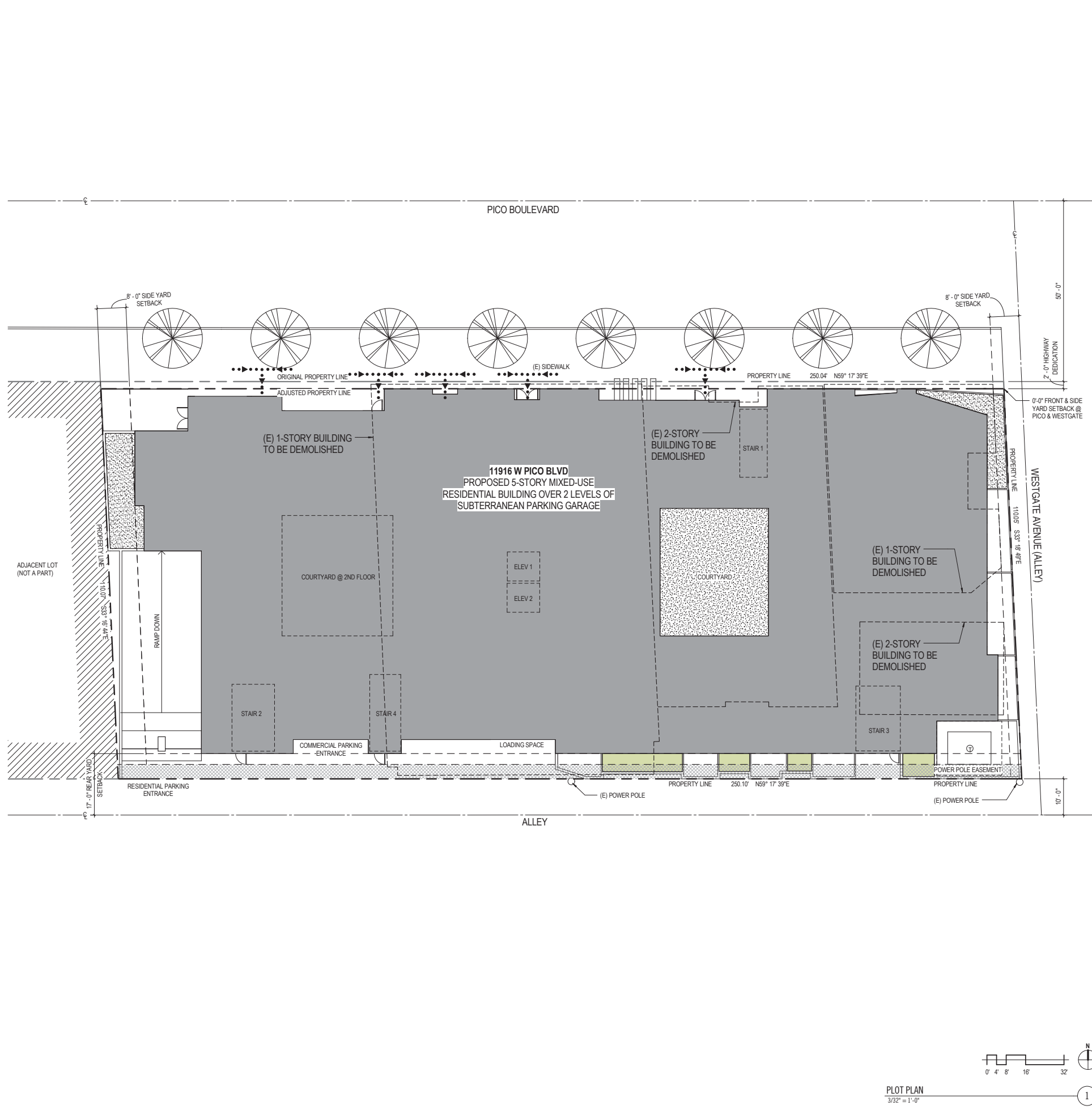
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ENTITLEMENT SET
JOB NUMBER:
14054
DATE:
1.7.2016
REVISED:

1:1
PLOT PLAN

100%
A000
1/2016



PROJECT INFORMATION

PROJECT NAME: AMOROSO ON PICO
ADDRESS: 11916 WEST PICO BOULEVARD
 LOS ANGELES, CA 90064
OWNER: ADC REAL ESTATE GROUP, LTD.
 27200 AGOURA ROAD, SUITE 201
 CALABASAS, CA 91301
PROJECT DESCRIPTION: 5-STORY MIXED-USE RESIDENTIAL APARTMENT BUILDING WITH GROUND FLOOR RETAIL, OVER 2 LEVELS OF SUBTERRANEAN PARKING GARAGE
CONSTRUCTION TYPE: 4 STORIES TYPE-V OVER 1 STORY ABOVE-GRADE TYPE-I PODIUM, OVER 2 STORIES TYPE-I SUBTERRANEAN GARAGE
ZONING: (Q) C2-1VL-CDO
FLOOD ZONE: X (NONE)
SITE AREA: 27,493 SF (PER SURVEY)
SET BACKS: FRONT YARD: 0'-0" SETBACK (C2 ZONE)
 SIDE YARD: 5' + 1' FOR EACH STORY OVER
 2ND FLOOR = 8'-0"
 REAR YARD*: 15' + 1' FOR EACH STORY OVER
 3RD FLOOR = 17'-0"
 *REAR YARD INCLUDES 1/2 ALLEY (PER 12.22 C.10)
ALLOWABLE DENSITY: LOT AREA = SITE AREA + 1/2 OF ADJACENT SOUTH ALLEY (PER SURVEY) PER LAMC 12.22 C.16
 HIGHWAY DEDICATION INCLUDED IN BUILDING AREA PER LAMC 12.37 G
 LOT AREA / 400 SF/D.U. = (27,493 + 2,501) / 400 = 74.9 (ROUND DOWN)
 = 74 UNITS x 1.35 (D.B) = 99.9 (ROUND UP) = 100 UNITS
PROPOSED UNITS: 100
ALLOWABLE BLDG HEIGHT: MAX BLDG HT FROM LOWEST POINT 5' FROM BLDG WITHIN 50' OF R1 ZONE:
 = 45' (PER C2-1VL HEIGHT DISTRICT)
 BEYOND 50' OF R1 TRANSITIONAL HT BOUNDARY:
 = 45' + 11' (PER DENSITY BONUS) = 56'-0" (PER LAMC 12.21.1B2)
PROPOSED BLDG HEIGHT: 45'-0" WITHIN 50' OF R1 ZONE;
 56'-0" BEYOND TRANSITIONAL HEIGHT BOUNDARY
OCCUPANCY TYPE: S2, A3, M, R2
LIVEWORK UNIT CONDITIONS: WILL NOT BE OPEN TO THE GENERAL PUBLIC. WILL NOT BE USED FOR INSTRUCTIONAL CLASSES, NOR WILL IT BE USED FOR RETAIL PURPOSES. THERE WILL BE NO EMPLOYEES WORKING IN THESE UNITS.

ZONING DATA

GROSS LOT SIZE: 27,493 (PER SURVEY)
ALLOWABLE UNIT COUNT: SEE PROJECT INFORMATION
UNITS PROPOSED: 100 -- SEE PROJECT INFORMATION
ALLOWABLE BLDG HEIGHT: 56'-0" -- SEE PROJECT INFORMATION
PROPOSED BLDG HEIGHT: 56'-0" -- SEE PROJECT INFORMATION
SETBACKS: FRONT YARD: 0'-0" SETBACK (C2 ZONE)
 SIDE YARD: 5' + 1' FOR EACH STORY OVER
 2ND FLOOR = 8'-0"
 REAR YARD*: 15' + 1' FOR EACH STORY OVER
 3RD FLOOR = 17'-0"
 *REAR YARD INCLUDES 1/2 ALLEY (PER 12.22 C.10)

LEGAL DESCRIPTION

PARCEL 1: LOTS 18 AND 19 OF TRACT NO. 7861, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 90, PAGES 27 AND 28 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
PARCEL 2: LOTS 20, 21, 22, 23, 24, 25, 26, AND 27 OF TRACT NO. 7861, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 90, PAGES 27 AND 28 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
 APN: 4259-039-008 and 4259-039-009 and 4259-039-010 and 4259-039-011

LEGEND

- PROPOSED GROUND FLOOR FOOTPRINT
- PROPOSED UPPER FLOORS FOOTPRINT
- EXISTING NEIGHBORHOOD BUILDINGS (NOT A PART)
- LANDSCAPE AREA
- EASEMENT
- ACCESSIBLE PATH OF TRAVEL
- INDICATES STRUCTURES TO BE DEMOLISHED

PROVIDED BIKE PARKING:

	RESIDENTIAL		RETAIL	
	REQ'D	PROVIDED	REQ'D	PROVIDED
LONG-TERM	100	100	4	4
SHORT-TERM	10	10	8	8

PARKING - RESIDENTIAL

REQUIRED RESIDENTIAL PARKING PER DENSITY BONUS ORDINANCE PARKING OPTION 1:
 1 SPACE < 3 HABITABLE ROOMS (STUDIOS)
 1 SPACE = 3 HABITABLE ROOMS (1 BR UNITS)
 2 SPACE > 3 HABITABLE ROOMS (2 BR UNITS)

UNIT TYPE	# OF UNITS	REQ'D PARKING STALLS
1 BR	25	25
2 BR	13	26
LIVE / WORK	3	3
STUDIO	59	59
Grand total:	100	113

PER BIKE ORDINANCE REPLACEMENT PLAN:
 UP TO 15% OF REQ'D AUTOMOBILE PARKING SPACES SERVING COVERED MULTIFAMILY DWELLING UNITS.
 15 x 113 = 16.95 = (ROUND UP) 17 SPACES
 TOTAL REQUIRED PARKING = 113 - 17 = 96 SPACES

PROVIDED RESIDENTIAL PARKING

P1 LEVEL		
(1) STANDARD	RESIDENTIAL	36
(2) COMPACT	RESIDENTIAL	8
(3) ACCESSIBLE	RESIDENTIAL	3
		47
P2 LEVEL		
(1) STANDARD	RESIDENTIAL	52
(2) COMPACT	RESIDENTIAL	4
(4) TANDEM	RESIDENTIAL	10
		66
Grand total		113

PER CBC 1109A.4, ACCESSIBLE PARKING SHALL BE PROVIDED FOR 2% OF ASSIGNED PARKING SPACES SERVING COVERED MULTIFAMILY DWELLING UNITS. 116 SPACES x 2% = 2.32 = 3 REQUIRED ACCESSIBLE STALLS (INCLUDES ONE VAN SPACE)

PARKING - RETAIL

REQUIRED RETAIL PARKING PER LAMC 12.21 A.4(a)(4), (5):
 SMALL RESTAURANT: 1 SPACE PER 200 GROSS SF
 GENERAL RETAIL: 1 SPACE PER 250 GROSS SF

REQUIRED RETAIL PARKING

NAME	TENANT	SF	REQ'D PARKING
RETAIL 1	SMALL RESTAURANT	1000 SF	5
RETAIL 2	GENERAL RETAIL	1625 SF	6
Grand total:			11

Grand total: 11
 *DINING ESTABLISHMENT WITH GROSS FLOOR AREA OF 1,000 SF OR LESS

PROVIDED RETAIL PARKING

1ST FLOOR		
(1) STANDARD	COMMERCIAL	6
(2) COMPACT	COMMERCIAL	3
(3) ACCESSIBLE	COMMERCIAL	2
Grand total		11

11 COMMERCIAL SPACES INCLUDES 1 ACCESSIBLE VAN SPACE PER CBC SECTION 1129B.3 & TABLE 11B-6

BIKE PARKING

REQUIRED RESIDENTIAL BIKE PARKING:
 LONG-TERM: 1 PER UNIT = 1 x 100 = 100 SPACES
 SHORT-TERM: 1 PER 10 UNITS = 1 x (100/10) = 10 SPACES

REQUIRED RETAIL BIKE PARKING:
 LONG-TERM: 1 PER 2,000 SF
 RETAIL 1: 1,000 SF / 2,000 = 0.5 SPACES = MIN. 2 SPACES REQ'D PER BIKE ORD.
 RETAIL 2: 1,625 SF / 2,000 = 0.81 SPACES = MIN. 2 SPACES REQ'D PER BIKE ORD.
TOTAL = 4 LONG-TERM SPACES
 SHORT-TERM: 1 PER 2,000 SF
 RETAIL 1: 1,000 SF / 2,000 = 0.5 SPACES = MIN. 2 SPACES REQ'D PER BIKE ORD.
 RETAIL 2: 1,500 SF / 2,000 = 0.75 SPACES = MIN. 2 SPACES REQ'D PER BIKE ORD.
TOTAL = 4 SHORT-TERM SPACES + 4 ADD'L SPACES (PER BIKE ORDINANCE REPLACEMENT OPTION) = 8 SHORT-TERM SPACES

OPEN SPACE REQUIRED

UNIT TYPE	# OF UNITS	REQ'D OPEN SPACE
1 BR	25	2500 SF
2 BR	13	1625 SF
LIVE / WORK	3	300 SF
STUDIO	59	5900 SF
Grand total:	100	10325 SF

OPEN SPACE REQUIREMENTS PER LAMC 12.21 G:
 100 SF UNIT < 3 HABITABLE ROOMS (STUDIO & 1 BR)
 125 SF UNIT = 3 HABITABLE ROOMS (2BR UNIT)

NOTE:
 1. A KITCHEN IS NOT CONSIDERED A HABITABLE ROOM FOR PURPOSES OF CALCULATING OPEN SPACE.
 2. PER LAMC 12.21 G.2 (a)(1)(ii) COMMON OPEN SPACE MUST HAVE A MINIMUM AREA OF 400 SF WITH NO HORIZONTAL DIMENSION LESS THAN 15' WHEN MEASURED PERPENDICULAR FROM ANY POINT ON EACH OF THE BOUNDARIES.
 3. PER LAMC 12.21 G.2 (a)(4)(i) RECREATION ROOMS MUST BE AT LEAST 600 SF FOR DEVELOPMENT OF 16+ DWELLING UNITS AND MUST NOT EXCEED 25% OF TOTAL REQUIRED OPEN SPACE.
PERCENT OF LANDSCAPED OPEN SPACE LANDSCAPED OPEN 25%.

OPEN SPACE PROPOSED

NAME	LEVEL	AREA (SF)
COMMON OPEN SPACE: GYM	1ST FLOOR	657
COMMON OPEN SPACE: REC ROOM	1ST FLOOR	877
COURTYARD	1ST FLOOR	1128
PRIVATE OPEN SPACE	1ST FLOOR	200
COURTYARD	2ND FLOOR	1507
PRIVATE OPEN SPACE	2ND FLOOR	50
PRIVATE OPEN SPACE	3RD FLOOR	100
COMMON OPEN SPACE: REC ROOM	4TH FLOOR	697
COMMON ROOF DECK	4TH FLOOR	4665
COMMON ROOF DECK	5TH FLOOR	444
Grand total		10325

FLOOR AREA RATIO

LOT AREA: 27,493 SF (PER SURVEY)
ALLOWABLE FAR:
 = 1.5:1 BASE FAR (PER C2-1VL ZONE)
 = 3:1 MAX ALLOWABLE FAR (DENSITY BONUS)
 = BUILDABLE AREA X 3
 = 27,493 SF X 3 = 82,479 SF

LEVEL	FAR	AREA (SF)
1ST FLOOR	COMMERCIAL	3023
		3023
1ST FLOOR	RESIDENTIAL	12496
2ND FLOOR	RESIDENTIAL	17467
3RD FLOOR	RESIDENTIAL	17487
4TH FLOOR	RESIDENTIAL	13503
5TH FLOOR	RESIDENTIAL	14508
Grand total		75461

FAR PROVIDED:
 = TOTAL AREA / BUILDABLE AREA
 = 78,484 SF / 27,493 SF = 2.9

FAR MEASUREMENT PER LAMC 12.03:
 AREA IN SQUARE FEET CONFINED WITHIN THE EXTERIOR WALLS OF A BUILDING, BUT NOT INCLUDING THE AREA OF THE FOLLOWING:
 EXTERIOR WALLS, STAIRWAYS, SHAFTS, ROOMS HOUSING BUILDING EQUIPMENT OR MACHINERY, PARKING AREAS WITH ASSOCIATED DRIVEWAYS AND RAMPS, SPACE FOR THE LANDING AND STORAGE OF HELICOPTERS, AND BASEMENT STORAGE AREAS.

UNIT COUNT

Unit Type	LEVEL	QTY
1 BR	1ST FLOOR	2
LIVE / WORK	1ST FLOOR	3
STUDIO	1ST FLOOR	5
		10
1 BR	2ND FLOOR	6
2 BR	2ND FLOOR	3
STUDIO	2ND FLOOR	18
		27
1 BR	3RD FLOOR	5
2 BR	3RD FLOOR	4
STUDIO	3RD FLOOR	18
		27
1 BR	4TH FLOOR	3
2 BR	4TH FLOOR	3
STUDIO	4TH FLOOR	9
		18
1 BR	5TH FLOOR	6
2 BR	5TH FLOOR	3
STUDIO	5TH FLOOR	9
		18
Grand total		100

OPEN SPACE PROPOSED

NAME	LEVEL	AREA (SF)
COMMON OPEN SPACE: GYM	1ST FLOOR	657
COMMON OPEN SPACE: REC ROOM	1ST FLOOR	877
COURTYARD	1ST FLOOR	1128
PRIVATE OPEN SPACE	1ST FLOOR	200
COURTYARD	2ND FLOOR	1507
PRIVATE OPEN SPACE	2ND FLOOR	50
PRIVATE OPEN SPACE	3RD FLOOR	100
COMMON OPEN SPACE: REC ROOM	4TH FLOOR	697
COMMON ROOF DECK	4TH FLOOR	4665
COMMON ROOF DECK	5TH FLOOR	444
Grand total		10325

PLOT PLAN
 3/32" = 1'-0"



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AMOROSO ON PICO

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ADC REAL ESTATE GROUP, LTD.
 27200 AGOURA ROAD, SUITE 201
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LEVEL P2 PLAN

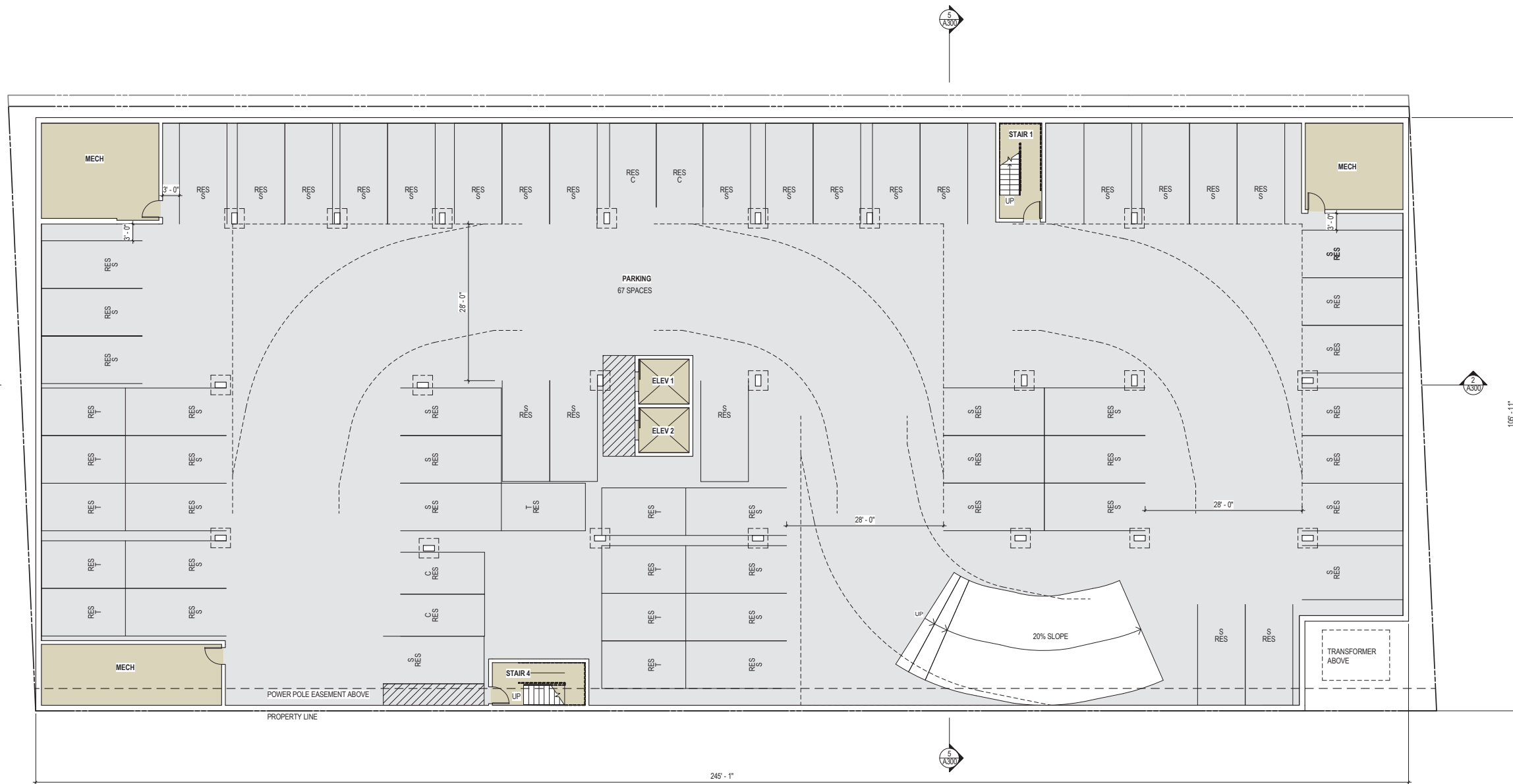
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NOTES

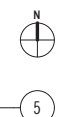
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LEGEND

-  CONCRETE BLOCK WALL
-  CONCRETE COLUMN
-  BIKE PARKING, DOUBLE-STACKED
(MIN 8'-0" CLR HT) UNO



LEVEL P2 PLAN
 1/8" = 1'-0"





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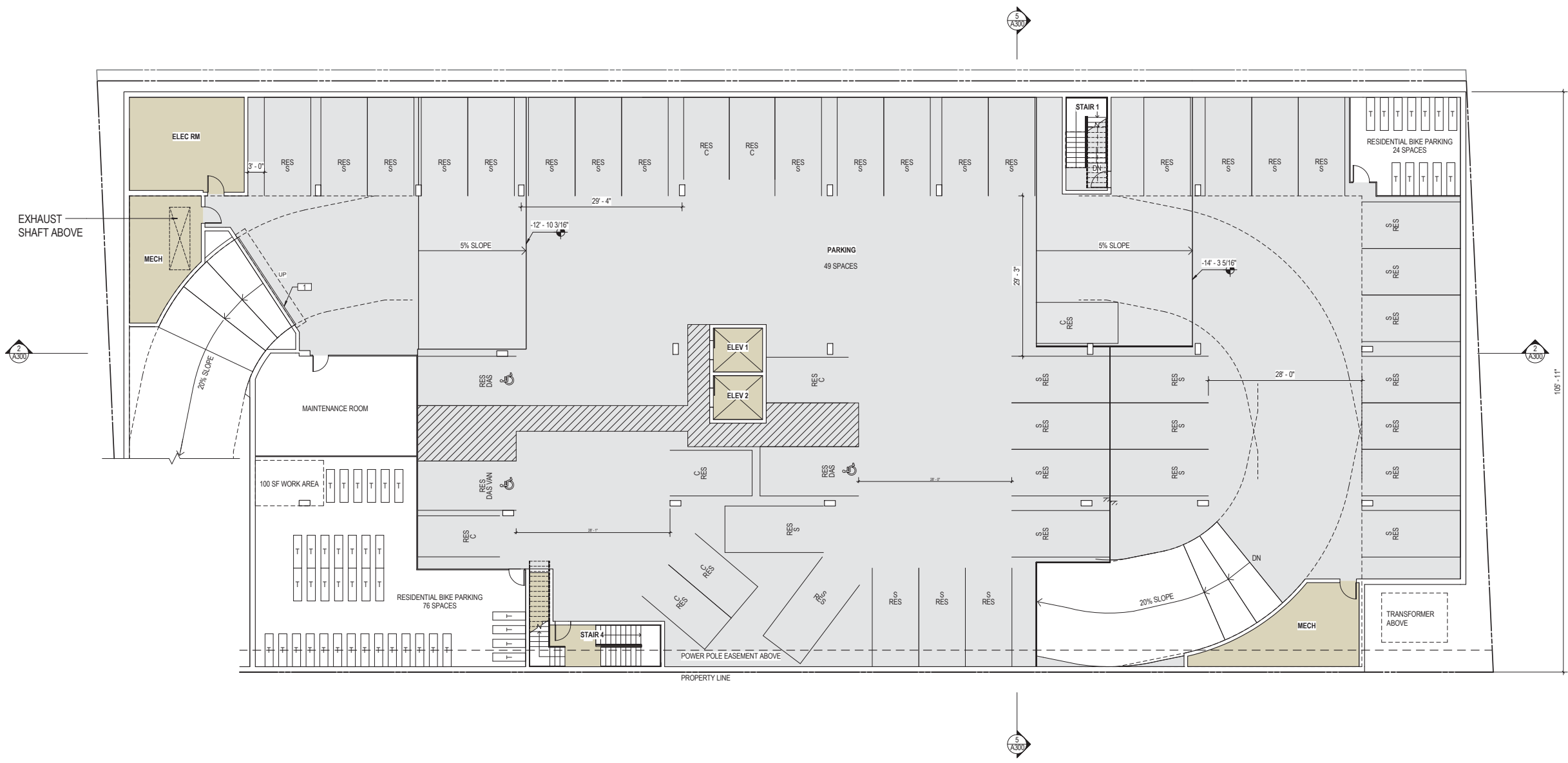
LEVEL P1 PLAN

SHEET NUMBER
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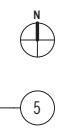
NOTES

LEGEND

-  CONCRETE BLOCK WALL
-  CONCRETE COLUMN
-  BIKE PARKING, DOUBLE-STACKED (MIN 8'-0" CLR HT) UNO



LEVEL P1 PLAN
 1/8" = 1'-0"



5



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ENTIREMENT SET

SHEET NUMBER:
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FIRST FLOOR PLAN

SHEET NUMBER:
A110

NOTES

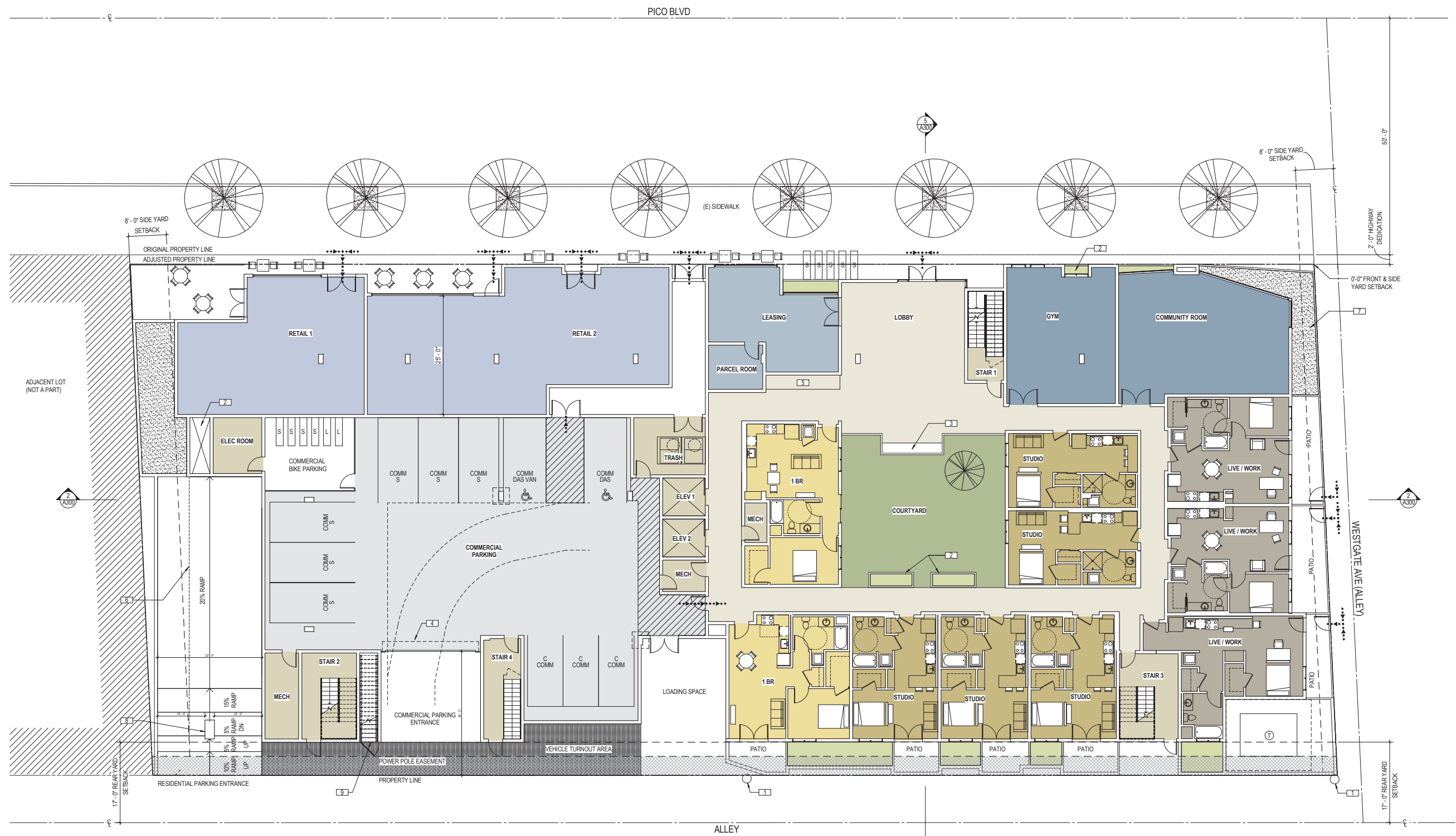
- 1 POWER POLE
- 2 PLANTER, SEE LANDSCAPE PLAN
- 3 BENCH
- 4 GATE
- 5 MAILBOXES
- 6 EDGE OF BUILDING ABOVE
- 7 LID PLANTER, TYP - SEE LANDSCAPE PLAN FOR LOCATIONS
- 8 COLUMN
- 9 FIRE ACCESS STAIR AND GATE

CDO SHEET NOTES

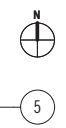
- A. THE EXTERIOR WALL OF ANY NEW CONSTRUCTION OR ADDITION OF FLOOR AREA SHOULD BE LOCATED NOT MORE THAN 5'-0" FROM ANY LOT LINE ADJOINING PICO BOULEVARD, UNLESS USED FOR LANDSCAPING, PLAZAS, COURTYARDS, OUTDOOR DINING, SEATING, KIOSKS, PASEOS, OR FOR OTHER ACTIVE PUBLIC USES.
- B. LIGHTING SHOULD BE LOW-VOLTAGE AND SHIELDED TO PREVENT GLARE TO PEDESTRIANS AND ADJACENT PROPERTIES.
- C. SURFACE PARKING LOTS SHOULD NOT BE LOCATED BETWEEN THE FRONT PROPERTY LINE AND THE PRIMARY BUILDING STOREFRONT ON PICO BOULEVARD. SURFACE PARKING SHOULD BE LOCATED TO THE REAR OF ALL STRUCTURES IF VEHICULAR ACCESS IS AVAILABLE TO THE REAR OF THE PARCEL EITHER FROM AN ALLEY OR A PUBLIC STREET.

LEGEND

- 60" DIAMETER CLEAR TURNING RADIUS
- SHORT-TERM BIKE PARKING
- LONG-TERM COMMERCIAL BIKE PARKING
- TRANSFORMER



1ST FLOOR PLAN
1/8" = 1'-0"





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SECOND FLOOR PLAN

SHEET NUMBER:
A120

NOTES

- 1 PLANTER, SEE LANDSCAPE PLAN



2ND FLOOR PLAN
1/8" = 1'-0"



5



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JOB NUMBER:
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THIRD FLOOR PLAN

SHEET NUMBER:
A130

NOTES



3RD FLOOR PLAN
 1/8" = 1'-0"



5



TRANSITIONAL HEIGHT BOUNDARY

TRANSITIONAL HEIGHT BOUNDARY

NOTES

- 1 GATE
- 2 DOG-WASHING STATION
- 3 FIREPLACE



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JOB NUMBER:
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DATE:
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REVISED:

NO.	DESCRIPTION	DATE

FOURTH FLOOR PLAN



5



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NOTES

SHEET NOTES

- A. EACH ROOF DECK CONTAINS LESS THAN 750 SF OF OCCUPIABLE SPACE

CDO SHEET NOTES

- A. EQUIPMENT SHOULD BE ENCLOSED OR SCREENED THROUGH USE OF BUILDING PARAPETS, MASONRY WALLS OR OTHER ARCHITECTURAL TREATMENTS THAT ARE INTEGRAL TO THE BUILDING'S FORM. ALL EXTERIOR MECHANICAL EQUIPMENT, INCLUDING HVAC EQUIPMENT, SATELLITE DISHES, CELLULAR ANTENNAS, SHOULD NOT BE VISIBLE FROM PUBLIC RIGHTS-OF-WAY.

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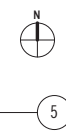
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FIFTH FLOOR PLAN

SHEET NUMBER:
A150
DATE: 1/7/2016



5TH FLOOR PLAN
1/8" = 1'-0"





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CALABASAS, CA 91301

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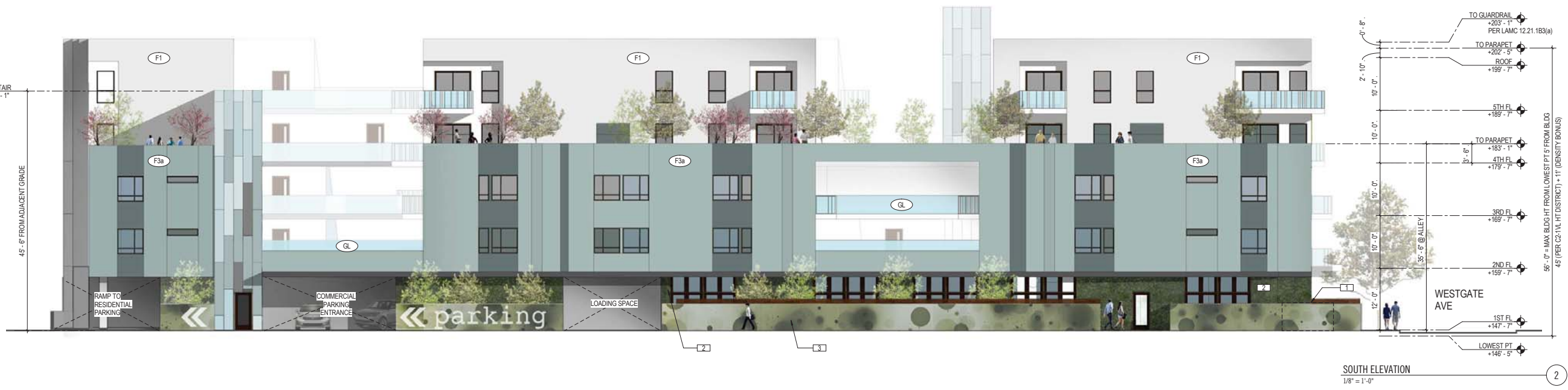
ENTITLEMENT SET

PROJECT NUMBER:
14054
DATE:
1.7.2016

ELEVATIONS

SHEET NUMBER:
A200

- ### NOTES
- TRANSFORMER
 - GREEN WALL
 - GRAPHIC MURAL WALL
- ### CDO NOTES
- RECESSED FACADE
 - STOREFRONT BAY
 - RECESSED FACADE
 - RECESSED BALCONY
- ### CDO SHEET NOTES
- ALL PROJECTS SHOULD PROVIDE HORIZONTAL ARCHITECTURAL TREATMENTS AND/OR FACADE ARTICULATIONS SUCH AS CORNICES, FRIEZES, AWINGS, PEDESTRIAN AMENITIES, OR OTHER FEATURES FOR THE FIRST 30'-0" OF BUILDING HEIGHT.
 - IF THE PROJECT INCLUDES 40'-0" OR MORE FEET OF BUILDING FRONTAGE, THEN VERTICAL ARCHITECTURAL TREATMENTS AND/OR FACADE ARTICULATIONS SUCH AS COLUMNS, PILASTERS, INDENTATIONS, STOREFRONT BAYS, WINDOWS, LANDSCAPING, OR OTHER FEATURES SHOULD BE PROVIDED AT LEAST EVERY 25'-0" ON CENTER.
 - AT LEAST 60% OF THE BUILDING FRONTAGE AT THE GROUND LEVEL SHOULD CONSIST OF DOORS AND DISPLAY WINDOWS OR WINDOWS AFFORDING VIEWS INTO THE STORE OR BUILDING. NON-REFLECTIVE GLASS SHOULD BE USED TO ALLOW MAXIMUM VISIBILITY FROM SIDEWALK AREAS INTO THE INTERIOR OF BUILDINGS.
 - THE EXTERIOR FACADE OF BUILDINGS SHOULD INCORPORATE NO MORE THAN 3 COMPLEMENTARY BUILDING MATERIALS AND COLORS EACH, INCLUDING BUT NOT LIMITED TO GLASS, TILE, TERRA COTTA, BRICK, STUCCO OR STONE. BRIGHT OR INTENSE COLORS AND STARK COLORS SUCH AS WHITE OR BLACK SHOULD NOT BE UTILIZED FOR LARGE AREAS. BRIGHT COLORS ON ARCHITECTURAL DETAILING, TRIM, WINDOW SASHES, DOORS AND FRAMES, OR AWINGS MAY BE USED IF THEY ARE COMPATIBLE WITH THE COLOR SCHEME OF THE BUILDING.
 - AWINGS SHOULD NOT BE PLACED HIGHER THAN THE LOWER TWO FLOORS. THE SIZE, SCALE AND COLOR SHOULD BE COMPATIBLE WITH REST OF THE BUILDING AND SHOULD BE DESIGNED AS AN INTEGRAL PART OF THE BUILDING ARCHITECTURE. AWINGS SHOULD BE OF WOVEN FABRIC (AND NOT VINYL), FADE RESISTANT, AND BE MAINTAINED IN GOOD CONDITION AND REPLACED PERIODICALLY. CANOPIES MAY BE CONSTRUCTED OF METAL OR GLASS IF THEY ARE COMPATIBLE IN SCALE AND DESIGN OF THE BUILDING.
- ### LEGEND
- (F1) PAINTED STUCCO - COLOR 1
 - (F1a) PAINTED STUCCO - SUBORDINATE TO COLOR 1
 - (F2) PAINTED STUCCO - COLOR 2
 - (F2a) PAINTED STUCCO - SUBORDINATE TO COLOR 2
 - (F3) PAINTED STUCCO - COLOR 3
 - (F3a) PAINTED STUCCO - SUBORDINATE TO COLOR 3
 - (F4) PAINTED METAL - ACCENT COLOR
 - (F5) PAINTED STUCCO - GROUND FLOOR RETAIL
 - (R1) BALCONY RAILING
 - (R2) BALCONY PANEL RAILING
 - (GL) GLAZING
 - (WD) WOOD SLATS





1625 OLYMPIC BOULEVARD
SANTA MONICA, CA 90404
310.399.7975
KFALOSANGELES.COM

AMOROSO ON PICO

11916 WEST PICO BOULEVARD
LOS ANGELES, CA 90064

ADC REAL ESTATE GROUP, LTD.
27200 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301

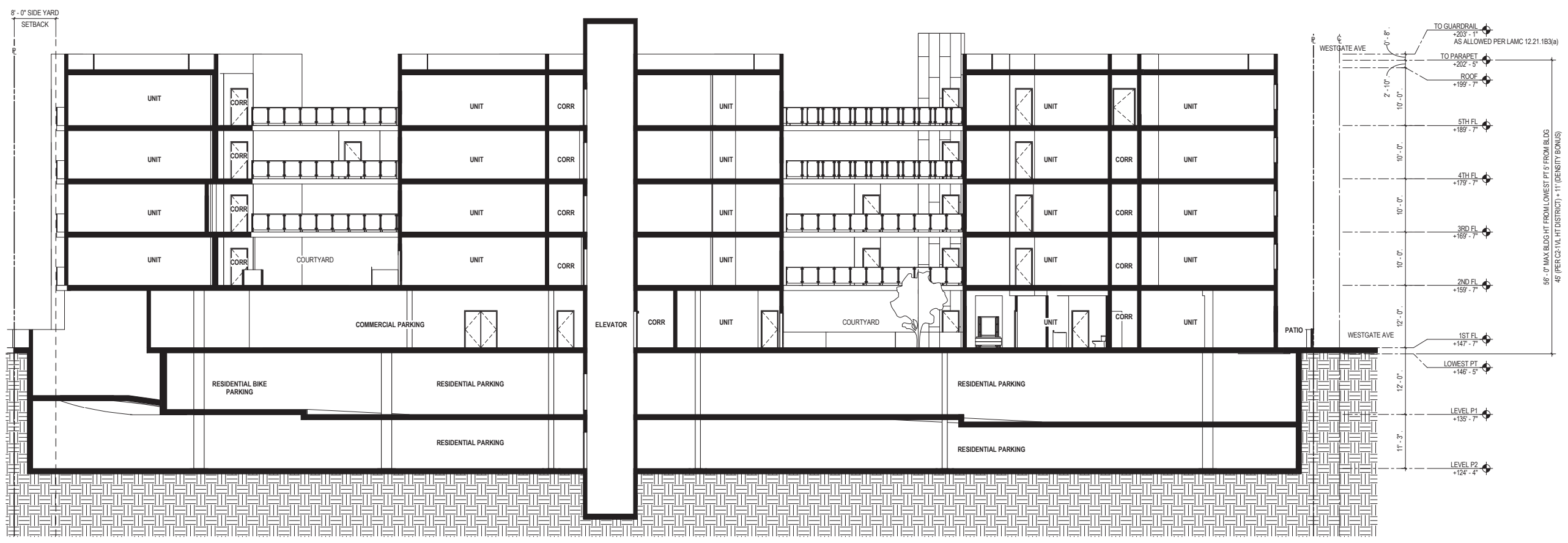
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ENTITLEMENT SET
JOB NUMBER:
14054
DATE:
1.7.2016
REVISIONS:

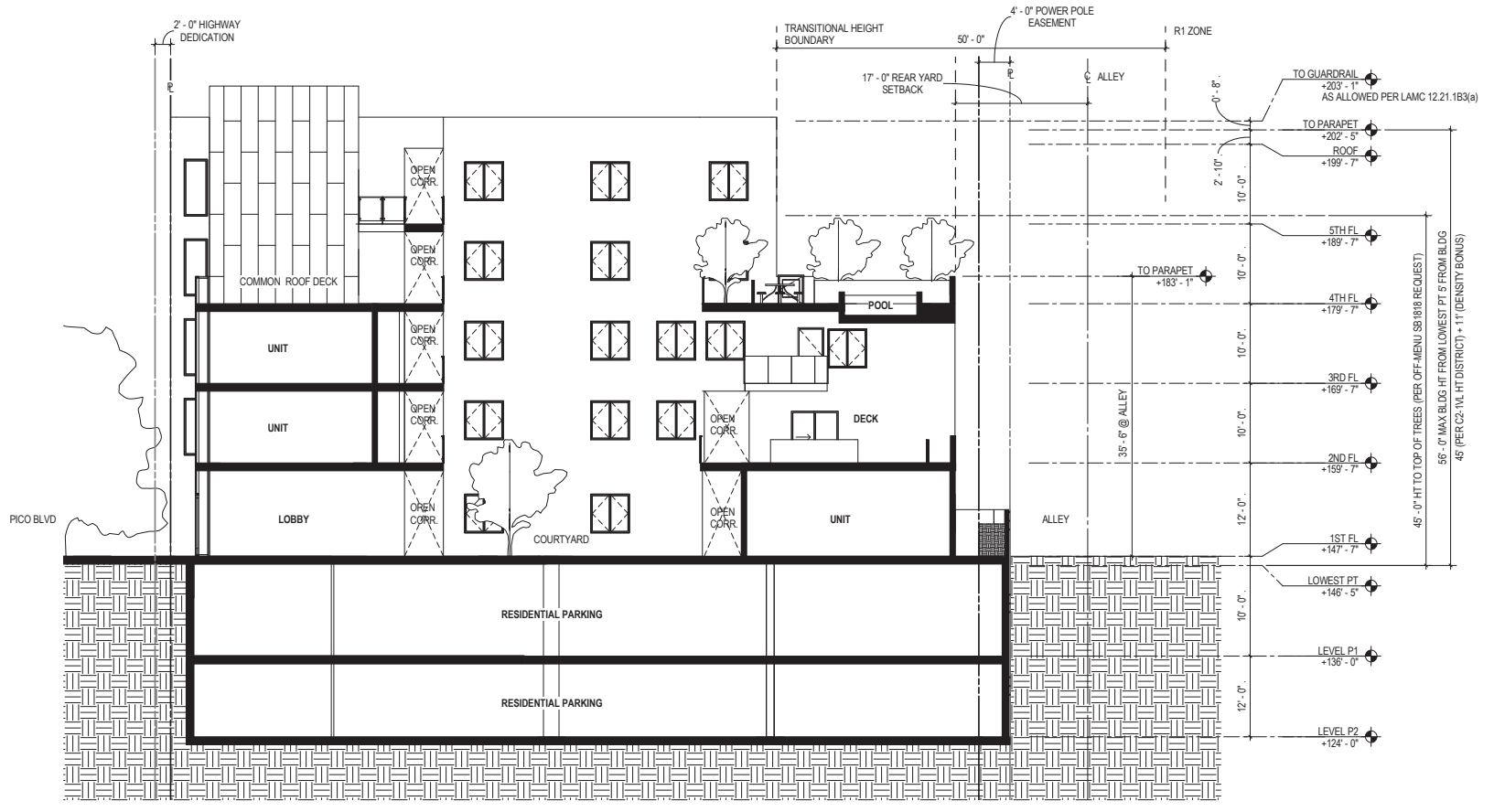
BUILDING SECTIONS

A300

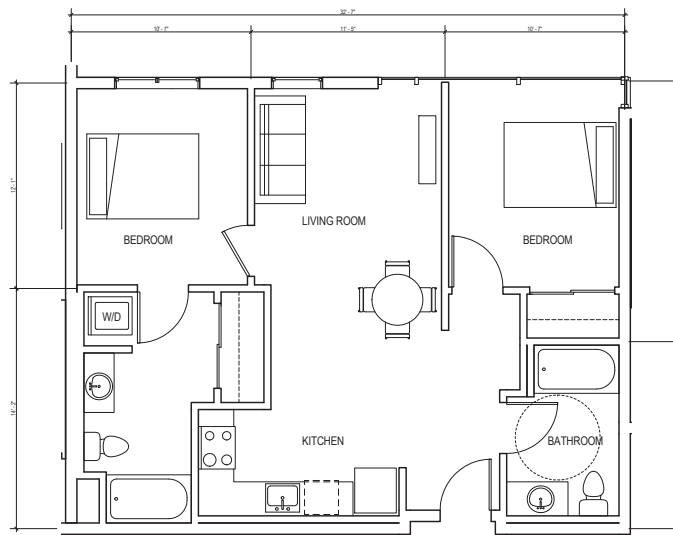
NOTES



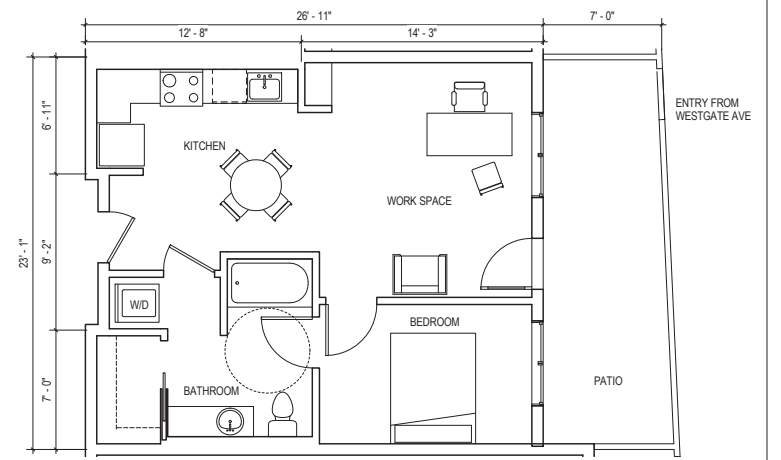
LONGITUDINAL SECTION
1/8" = 1'-0" (2)



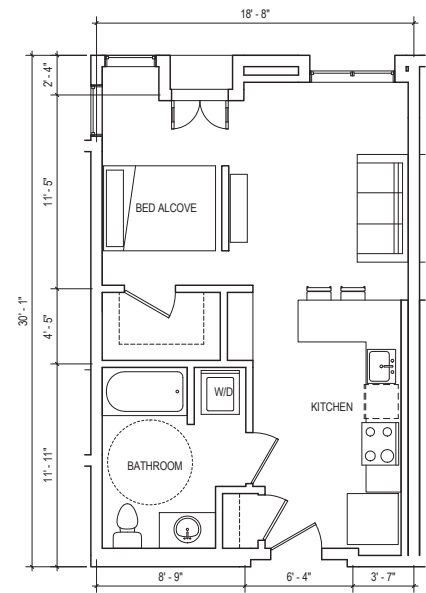
TRANSVERSE SECTION
1/8" = 1'-0" (5)



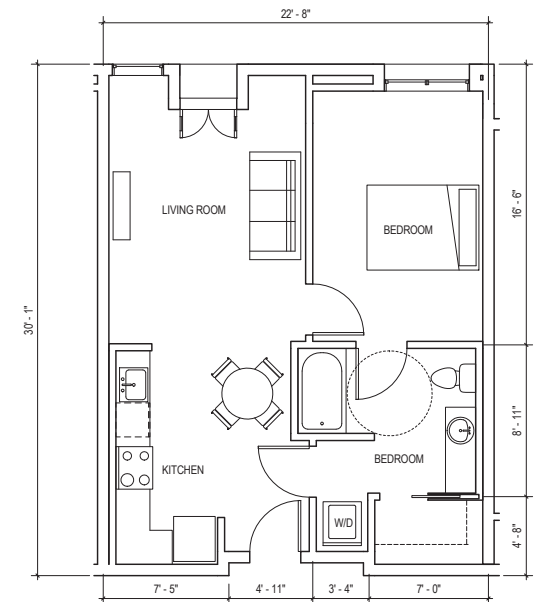
ENLARGED 2 BR
1/4" = 1'-0" 4



ENLARGED LIVE / WORK UNIT
1/4" = 1'-0" 1



ENLARGED STUDIO
1/4" = 1'-0" 2



ENLARGED 1 BR
1/4" = 1'-0" 3



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27200 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301

ENTITLEMENT SET

JOB NUMBER:
14054
DATE:
1.7.2016

TYPICAL UNIT PLANS

A500

DATE: 1.7.2016



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SANTA MONICA, CA 90404
310.399.7975
KFALOSANGELES.COM



VIEW FROM PICO FACING SOUTHWEST 1

AMOROSO ON PICO

11916 WEST PICO BOULEVARD
LOS ANGELES, CA 90064

ADC REAL ESTATE GROUP, LTD.
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CALABASAS, CA 91301



VIEW THROUGH WESTGATE AVE 2

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IN ANY FORM OR BY ANY MEANS, WITHOUT WRITTEN PERMISSION.
DATE: 07/17/2016

ENTITLEMENT SET

JOB NUMBER
14054
DATE
1.7.2016
DRAWN BY

- _____
- _____
- _____
- _____
- _____
- _____
- _____
- _____
- _____

DRAWN BY
RENDERED VIEWS

DRAWN BY
A600
DATE: 5/24/16



HERMANN DESIGN GROUP
77-899 WOLF RD.
SUITE 102
PALM DESERT, CA
92271
LIC# 2754 EXP. 4/30/16
PH. (760) 777-9131
FAX (760) 777-9132

AMOROSO ON PICO

11916 WEST PICO BOULEVARD
LOS ANGELES, CA 90064

ADC REAL ESTATE GROUP, LTD.
27200 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301



ENTITLEMENT SET

JOB NUMBER:
14054
DATE:
5.29.2015

FIRST FLOOR PLANTING PLAN

SHEET NUMBER:
L101

NOTES

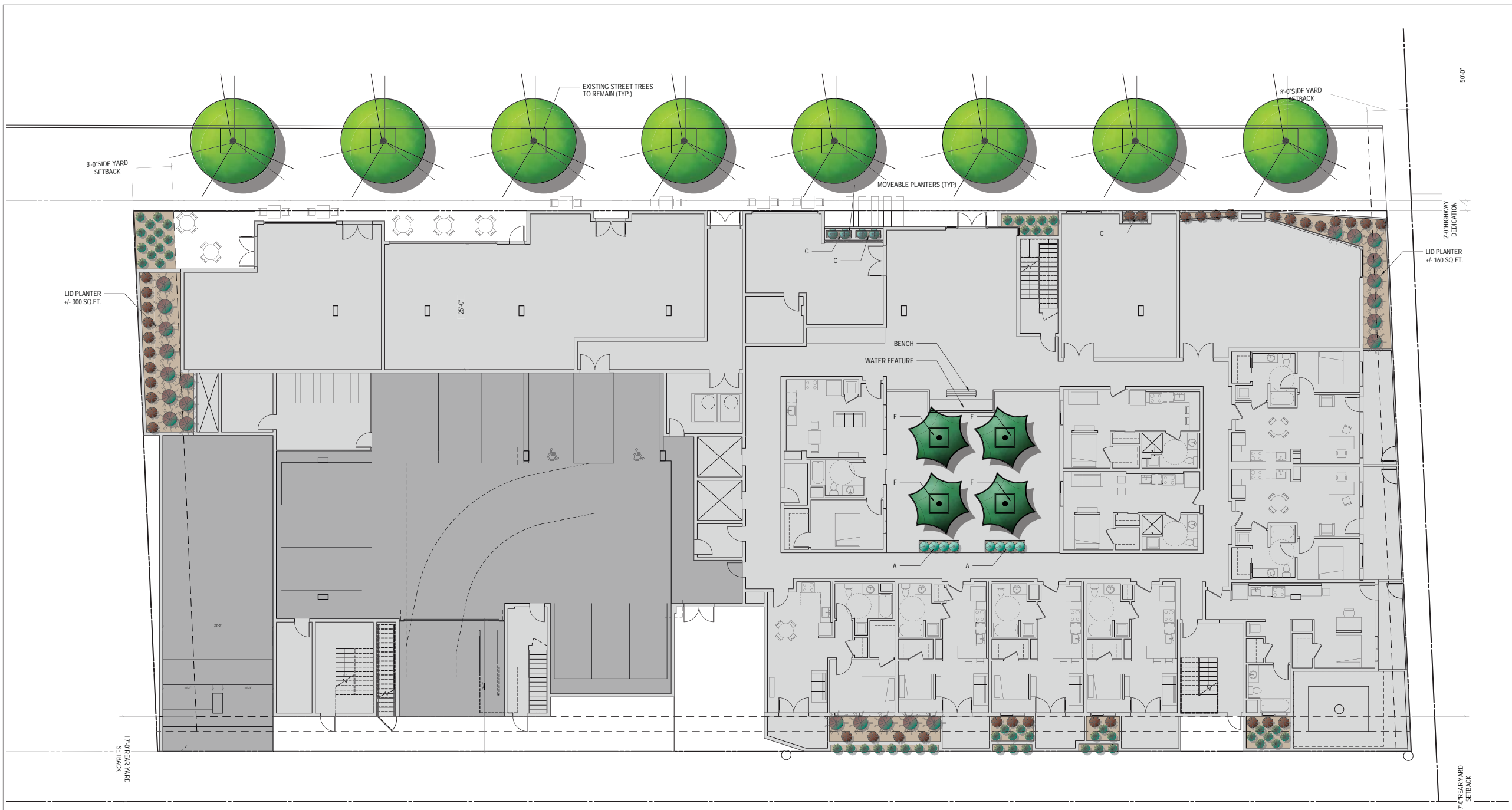
OPEN SPACE

REQUIRED OPEN SPACE PER LAMC 12.21 G:
100 SF/UNIT FOR = 3 HABITABLE ROOMS (STUDIOS, LIVELINE, & 1 BR UNITS)
125 SF/UNIT FOR = 3 HABITABLE ROOMS (2 BR UNITS)

UNIT TYPE	# OF UNITS	REQ'D OPEN SPACE
1 BR	36	3600 SF
2 BR	12	1500 SF
LIVE / WORK	3	300 SF
STUDIO	49	4900 SF
Grand total:	100	10300 SF

NAME	LEVEL	AREA (SF)
COMMON OPEN SPACE: GYM	1ST FLOOR	632
COMMON OPEN SPACE: REC ROOM	1ST FLOOR	869
COURTYARD	1ST FLOOR	1059
PRIVATE OPEN SPACE	1ST FLOOR	100
		2660
COURTYARD	2ND FLOOR	833
PRIVATE OPEN SPACE	2ND FLOOR	300
		1133
PRIVATE OPEN SPACE	3RD FLOOR	300
		300
COMMON ROOF DECK	4TH FLOOR	735
PRIVATE OPEN SPACE	4TH FLOOR	250
		985
COMMON ROOF DECK	5TH FLOOR	5222
		5222
Grand total:		10300

SEE ALSO SHEET G021
A KITCHEN IS NOT CONSIDERED A HABITABLE ROOM FOR PURPOSES OF CALCULATING OPEN SPACE.
PER LAMC 12.21 G.2 (a)(1)(ii) COMMON OPEN SPACE MUST HAVE A MINIMUM AREA OF 400 SF WITH NO HORIZONTAL DIMENSION LESS THAN 15' WHEN MEASURED PERPENDICULAR FROM ANY POINT ON EACH OF THE BOUNDARIES.
PER LAMC 12.21 G.2 (a)(4)(i) RECREATION ROOMS MUST BE AT LEAST 600 SF FOR DEVELOPMENT OF 16+ DWELLING UNITS AND MUST NOT EXCEED 25% OF TOTAL REQUIRED OPEN SPACE.
PERCENT OF LANDSCAPED OPEN SPACE
LANDSCAPED OPEN 25%.

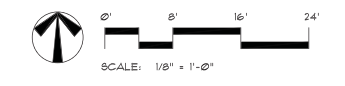


PLANT LEGEND

SYMBOL	QTY.	BOTANICAL NAME COMMON NAME	SIZE	SPACING	REMARKS	WATER USE
	8	PLATANUS RACEMOSA CALIFORNIA SYCAMORE	EXISTING	AS SHOWN	SINGLE-TRUNK	0.5 MOD
	1	ALOE 'HERCULES' HERCULES ALOE	24" BOX	AS SHOWN	SPECIMEN	0.2 LOW
	3	CITRUS KUMQUAT 'NAGAMI' NAGAMI KUMQUAT	24" BOX	AS SHOWN	SINGLE-TRUNK	0.5 MOD
	14	HYMENOPHORUM FLAVUM SWEET SHADE	24" BOX	AS SHOWN	SINGLE-TRUNK	0.5 MOD
	4	BAMBUSA 'ALPHONSE KARR' ALPHONSE KARR BAMBOO	15 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD
	4	FIGUS BENJAMINA WEeping FIG	15 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD

SYMBOL	QTY.	BOTANICAL NAME COMMON NAME	SIZE	SPACING	REMARKS	WATER USE
	20	PODOCARPUS MACROPHYLLUS x MAKI' SHRUBBY PODOCARPUS	15 GAL.	AS SHOWN	SINGLE-TRUNK	0.5 MOD
	121	CAREX TUMULICOLA BERKELEY SEDGE	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD
	33	CHONDROPETALUM TECTORUM CAPE RUSH	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.2 LOW
	113	JUNCUS PATENS 'ELK BLUE' CALIFORNIA GREY RUSH	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.2 LOW
	60	PHORMIUM 'TOM THUMB' TOM THUMB NEW ZEALAND FLAX	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.2 LOW
	10	DIANELLA REVOLUTA 'LITTLE REV' LITTLE REV FLAX LILY	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD
	4	DIANELLA TASMANICA 'VARIEGATA' VARIEGATED FLAX LILY	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD
	4	PEDILANTHUS MACROCARPUS LADY'S SLIPPER	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD

CONTAINERS	QTY.	MANUFACTURER'S CONTACT INFO.
	5	WR-963030 36" x 30" x 30" H
	2	WR-123030 12" x 30" x 30" H
	3	WR-60824 60" x 18" x 24" H (MOVEABLE PLANTER)
	4	WR-2400 24" x 24" x 24" H
	13	WR-3600 36" x 36" x 30" H
	9	WR-4800 48" x 48" x 36" H
	5	BENCH - YC-0102 70.9" x 21.9" x 31" H





HERMANN DESIGN GROUP
77-899 WOLF RD.
SUITE 102
PALM DESERT, CA
92211
LIC# 2754 EXP. 4/30/16
PH. (760) 777-9131
FAX (760) 777-9132

NOTES

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		300
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COMMON ROOF DECK	5TH FLOOR	5222
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Grand total		10300

SEE ALSO SHEET G021
A KITCHEN IS NOT CONSIDERED A HABITABLE ROOM FOR PURPOSES OF CALCULATING OPEN SPACE.
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PERCENT OF LANDSCAPED OPEN SPACE
LANDSCAPED OPEN 25%

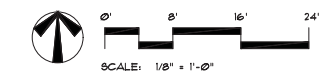


PLANT LEGEND

SYMBOL	QTY.	BOTANICAL NAME COMMON NAME	SIZE	SPACING	REMARKS	WATER USE
TREES						
	8	PLATANUS RACEMOSA CALIFORNIA SYCAMORE	EXISTING	AS SHOWN	SINGLE-TRUNK	0.5 MOD
	1	ALOE 'HERCULES' HERCULES ALOE	24" BOX	AS SHOWN	SPECIMEN	0.2 LOW
	3	CITRUS KUMQUAT 'NAGAMI' NAGAMI KUMQUAT	24" BOX	AS SHOWN	SINGLE-TRUNK	0.5 MOD
	14	HYMENOPHORUM FLAVUM SWEET SHADE	24" BOX	AS SHOWN	SINGLE-TRUNK	0.5 MOD
	4	BAMBUSA 'ALPHONSE KARR' ALPHONSE KARR BAMBOO	15 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD
	4	FIGUS BENJAMINA WEeping FIG	15 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD

SYMBOL	QTY.	BOTANICAL NAME COMMON NAME	SIZE	SPACING	REMARKS	WATER USE
SHRUBS						
	20	PODOCARPUS MACROPHYLLUS x MAKI' SHRUBBY PODOCARPUS	15 GAL.	AS SHOWN	SINGLE-TRUNK	0.5 MOD
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	113	JUNCUS PATENS 'ELK BLUE' CALIFORNIA GREY RUSH	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.2 LOW
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	4	DIANELLA TASMANICA 'VARIEGATA' VARIEGATED FLAX LILY	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD
	4	PEDILANTHUS MACROCARPUS LADY'S SLIPPER	5 GAL.	AS SHOWN	FULL 4 BUSHY	0.5 MOD

CONTAINERS						
	5	WR-963030	96" x 30" x 30" H	MANUFACTURER'S CONTACT INFO:		
	2	WR-123030	12" x 30" x 30" H	TOURNESOL SITEWORKS, LLC		
	3	WR-60824	60" x 18" x 24" H (MOVEABLE PLANTER)	30955 SAN ANTONIO STREET		
	4	WR-2400	24" x 24" x 24" H	HAYWARD, CA 94544 USA		
	13	WR-3600	36" x 36" x 30" H	NOTE:		
	9	WR-4800	48" x 48" x 36" H	ALL CONTAINERS WILL BE EQUIPPED		
	5	BENCH - YC-010	10.9" x 21.9" x 31" H	WITH SELF-WATERING BASINS FITTED		
				TO EACH CONTAINER SIZE.		
				PRODUCT: YARRABILBA, BY: TOURNESOL SITEWORKS, LLC		



AMOROSO ON PICO
11916 WEST PICO BOULEVARD
LOS ANGELES, CA 90064

ADC REAL ESTATE GROUP, LTD.
27200 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301



ENTITLEMENT SET

JOB NUMBER:
14054
DATE:
5.19.2015

SECOND FLOOR
PLANTING PLAN



HERMANN DESIGN GROUP
77-899 WOLF RD.
SUITE 102
PALM DESERT, CA
92211
LIC# 2754 EXP. 4/30/16
PH. (760) 777-9131
FAX (760) 777-9132

NOTES

OPEN SPACE

REQUIRED OPEN SPACE PER LAMC 12.21 G:
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125 SF/UNIT FOR = 3 HABITABLE ROOMS (2 BR UNITS)

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LIVE / WORK	3	300 SF
STUDIO	49	4900 SF
Grand total:	100	10300 SF

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LANDSCAPED OPEN 25%

AMOROSO ON PICO
11916 WEST PICO BOULEVARD
LOS ANGELES, CA 90064

ADC REAL ESTATE GROUP, LTD.
27200 AGOURA ROAD, SUITE 201
CALABASAS, CA 91301



ENTITLEMENT SET
JOB NUMBER: 14054
DATE: 5.19.2015

FOURTH FLOOR
PLANTING PLAN

L103



PLANT LEGEND

SYMBOL	QTY.	BOTANICAL NAME COMMON NAME	SIZE	SPACING	REMARKS	WATER USE
TREES						
	8	PLATANUS RACEMOSA CALIFORNIA SYCAMORE	EXISTING	AS SHOWN	SINGLE-TRUNK	0.5 MOD
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	3	CITRUS KUMQUAT 'NAGAMI' NAGAMI KUMQUAT	24" BOX	AS SHOWN	SINGLE-TRUNK	0.5 MOD
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CONTAINERS						
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	3	WR-601024	60" X 18" X 24" H (MOVEABLE PLANTER)	NOTE:		
	4	WR-2400	24" X 24" X 24" H	ALL CONTAINERS WILL BE EQUIPPED WITH SELF-WATERING BASINS FITTED TO EACH CONTAINER SIZE.		
	13	WR-3600	36" X 36" X 30" H			
	9	WR-4800	48" X 48" X 36" H			
	5	BENCH - YC-0102	70.9" X 21.9" X 31" H	PRODUCT: YARRABILBA, BY: TOURNEBOL SITEWORKS, LLC		

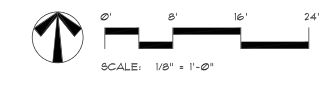


Exhibit B

**ENV-2015-2210-MND
and Mitigation
Monitoring Program**



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 AREA

11916 Pico Mixed-Use Project *Case No. ENV-2015-2210-MND*
Council District No. 11

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

Project Address: 11916-11936 West Pico Boulevard, Los Angeles, California 90064

Project Description: The Project involves the removal of the existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family use and the construction of a five-story, 56-foot tall building with 100 dwelling units including nine affordable (very-low income) units, 2,871 square feet of restaurant uses, 129 parking spaces in three levels of subterranean parking, and 200 bicycle parking spaces, totaling approximately 81,224 square feet of floor area. The Project would be developed on four parcels. The Project Site would have a full-access driveway to the parking garage from rear alleyway. The following approvals may be included as part of the project: (1) Site Plan Review; (2) Director's Determination for the West Pico Boulevard Community Design Overlay Plan; (3) Density Bonus Compliance with: (a) on-menu incentive to increase the allowable floor area from 1.5:1 to 3:1 and to increase the height from 45-feet to 56-feet on the portion of the building fronting Pico Boulevard and (b) off-menu incentives/waiver of development standards to waive transitional height limitations for the back portion of the building within 100-feet from the nearest R-1 zoned property and to allow five stories in lieu of the permitted three stories; (4) Adoption of the Initial Study/Mitigated Negative Declaration; and (5) Grading/Building Permits.

APPLICANT:

ADC Real Estate Group, LTD

PREPARED BY:

Los Angeles City Planning Department

October 2015

TABLE OF CONTENTS

I.	INTRODUCTION	I-1
II.	PROJECT DESCRIPTION	II-1
III.	ENVIRONMENTAL IMPACT ANALYSIS	III-1
	1. Aesthetics	III-1
	2. Agriculture	III-14
	3. Air Quality	III-17
	4. Biological Resources	III-26
	5. Cultural Resources	III-30
	6. Geology and Soils.....	III-33
	7. Greenhouse Gas Emissions.....	III-39
	8. Hazards and Hazardous Materials	III-48
	9. Hydrology and Water Quality	III-56
	10. Land Use and Planning.....	III-64
	11. Mineral Resources	III-92
	12. Noise	III-94
	13. Population and Housing.....	III-110
	14. Public Services	III-113
	15. Recreation	III-124
	16. Transportation/Traffic	III-125
	17. Utilities and Service Systems	III-142
	18. Mandatory Findings of Significance.....	III-155
IV.	PREPARERS OF THE EIR AND PERSONS CONSULTED	IV-1
V.	REFERENCES.....	V-1
VI.	ACRONYMS AND ABBREVIATIONS.....	VI-1

APPENDICES

APPENDIX A: Environmental Assessment Form (EAF)

APPENDIX B: Service Letter Responses

APPENDIX C: Air Quality Worksheets

APPENDIX D: Health Risk Assessment

APPENDIX E: Geotechnical Report

APPENDIX F: Greenhouse Gases Worksheets

APPENDIX G: Phase I Report

APPENDIX H: Noise Report

APPENDIX I: Traffic Letter

LIST OF FIGURES

Figure II-1, Regional and Project Vicinity Map.....	II-2
Figure II-2, Aerial View of the Project Site	II-3
Figure II-3, Views of Project Site – Views 1, 2, and 3.....	II-5
Figure II-4, Views of Project Site – Views 4, 5 and 6.....	II-6
Figure II-5, Views of Surrounding Uses – Views 1, 2, and 3.....	II-7
Figure II-6, Views of Surrounding Uses – Views 4, 5, and 6.....	II-8
Figure II-7, Views of Surrounding Uses – Views 7, 8, and 9.....	II-9
Figure II-8, Conceptual 1 st Floor Site Plan.....	II-11
Figure II-9, Conceptual 2 nd Floor Site Plan	II-12
Figure II-10, Conceptual 3 rd Floor Site Plan	II-13
Figure II-11, Conceptual 4 th Floor Site Plan	II-14
Figure II-12, Conceptual 5 th Floor Site Plan	II-15
Figure II-13, Conceptual Parking Level 1.....	II-16
Figure II-14, Conceptual Parking Level 2.....	II-17
Figure II-15, Conceptual Cross Sections.....	II-18
Figure II-16, Conceptual Elevations	II-19
Figure II-17, Conceptual Rendering-Pico West View	II-20
Figure II-18, Conceptual Rendering-Pico East View.....	II-21
Figure II-19, Conceptual Rendering-Westgate View.....	II-22
Figure III-1, Summer Shadows	III-10
Figure III-2, Winter Shadows	III-11
Figure III-3, Equinox Shadows.....	III-12
Figure III-4, Noise Monitoring and Sensitive Receptor Location Map	III-98

LIST OF TABLES

Table II-1, Project Site Addresses and Assessor Parcel Numbers	II-1
Table II-2, Open Space Areas	II-4
Table II-3, Project Development Summary.....	II-10
Table III-1, SCAQMD Thresholds of Significance.....	III-18
Table III-2, Estimated Peak Daily Construction Emissions	III-20
Table III-3, Existing Daily Operational Emissions at Project Site.....	III-21
Table III-4, Estimated Daily Operational Emissions	III-22
Table III-5, Localized On-Site Peak Daily Construction Emissions.....	III-25
Table III-6, Project Construction-Related Greenhouse Gas Emissions	III-44
Table III-7, Existing Greenhouse Gas Emissions.....	III-45
Table III-8, Project Operational Greenhouse Gas Emissions	III-46
Table III-9, Project Consistency with Applicable Regional Comprehensive Plan Goals	III-66
Table III-10, Consistency of the Project With Applicable Goals of 2012-2035 RTP/SCS	III-70
Table III-11, Consistency of with the Applicable Objectives and Policies of the Framework Element	III-73
Table III-12, Consistency with Applicable Policies of the Palms-Mar Vista-Del Rey Community Plan.....	III-77
Table III-13, Compounds Emitted From On-Road Mobile Source Activity.....	III-85
Table III-14, Maximum Residential Receptor/Carcinogenic Risk	III-87
Table III-15, California Ambient Air Quality Standards.....	III-88
Table III-16, Northwest Coastal L.A. County Monitoring Summary/Source-Receptor Area 2 ..	III-89
Table III-17, SCAQMD Air Quality Significance Thresholds.....	III-90
Table III-18, Particulate Filter Efficiencies	III-90
Table III-19, Maximum Residential Receptor / PM ₁₀ MERV Filter Mitigation.....	III-91
Table III-20, Maximum Residential Receptor / PM ₁₀ and PM _{2.5}	III-91

Table III-21, Noise Range of Typical Construction Equipment.....	III-99
Table III-22, Typical Outdoor Construction Noise Levels.....	III-99
Table III-23, Existing Ambient Daytime Noise Levels in Project Site Vicinity.....	III-100
Table III-24, Estimated Exterior Constuction Noise at Nearest Sensitive Receptors.....	III-101
Table III-25, Vibration Source Levels for Construction Equipment.....	III-105
Table III-26, Community Noise Exposure (CNEL).....	III-107
Table III-27, Estimated Proposed Project Student Generation.....	III-120
Table III-28, Proposed Project Impact on Public Schools.....	III-120
Table III-29, Existing and Project Uses Trip Generation Rates.....	III-128
Table III-30, Project and Existing Site Uses Trip Generation Estimates.....	III-131
Table III-31, Project Vehicular Parking.....	III-138
Table III-32, Project Bicycle Parking.....	III-139
Table III-33, Estimated Average Daily Water Consumption for the Proposed Project.....	III-144
Table III-34, Estimated Average Daily Wastewater Generation for the Proposed Project.....	III-146
Table III-35, Landfill Capacity and Intake.....	III-150
Table III-36, Estimated Average Daily Solid Waste Generation for the Proposed Project.....	III-153

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

LEAD CITY AGENCY: City of Los Angeles		COUNCIL DISTRICT: 11
PROJECT TITLE: 11916 Pico Mixed-Use Project	ENVIRONMENTAL CASE: ENV-2014-2210-MND	CASE NO. CPC-2015-2209-DB-CDO-SPR

PROJECT LOCATION: 11916 West Pico Boulevard

PROJECT DESCRIPTION:
The Project involves the removal of the existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family use and the construction of a five-story, 56-foot tall building, which would include a total of 100 dwelling units on the upper levels, 2,871 square feet of restaurant uses on the ground floor, 129 parking spaces located within three subterranean levels, and 200 bicycle parking spaces. The residential portion would be comprised of 100 multi-family units, including 3 live/work units, 49 studio apartments, 36 one-bedroom apartments, and 12 two-bedroom apartments. Of the 100 units, 9 will be set aside for very low income. The Project would include approximately 81,224 total square feet of building area and approximately 10,300 square feet of open space, including a gym, lounge, community room, common roof deck, and two courtyards. The Project Site would have full-access driveway to the parking garage from the alley way located along the southern boundary of the Project Site. The following approvals may be included as part of the project: (1) Site Plan Review; (2) Director's Determination for the West Pico Boulevard Community Design Overlay Plan; (3) Density Bonus Compliance with: (a) on-menu incentive to increase the allowable floor area from 1.5 to 1 to 3 to 1 and to increase the height from 45-feet to 56 feet on the portion of the building fronting Pico Boulevard and (b) off-menu incentives/waiver of development standards to waive transitional height limitations) for the back portion of the building within 100-feet from the nearest R-1 zoned property and to allow five stories in lieu of the permitted three stories; (4) Adoption of the Initial Study/Mitigated Negative Declaration; and (5) Grading/Building Permits.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
ADC Real Estate Group, LTD.
27200 Agoura Road, Suite 201
Calabasas, CA 91301

FINDING:
The Department of City Planning of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this project. The mitigation measures outlined on the attached pages will reduce any potentially significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written comment received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM <i>Oliver Netburn</i>	TITLE <i>City Planning Associate</i>	TELEPHONE NUMBER <i>213/978-1782</i>
ADDRESS 200 North Spring Street, 7 th Floor Los Angeles, CA 90012	SIGNATURE (Official) <i>Charles Kausch</i>	DATE <i>Nov. 2, 2015</i>

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: October 2015
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2015-2209-MND	RELATED CASES: N/A	
PREVIOUS ACTIONS CASE NO.	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.	
PROJECT DESCRIPTION: The construction of a five-story, 56-foot tall building, which would include a total of 100 dwelling units, 2,871 square feet of restaurant uses, 129 parking spaces, and 200 bicycle parking spaces.		
ENV PROJECT DESCRIPTION: The Project involves the removal of the existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family use and the construction of a five-story, 56-foot tall building, which would include a total of 100 dwelling units on the upper levels, 2,871 square feet of restaurant uses on the ground floor, 129 parking spaces located within three subterranean levels, and 200 bicycle parking spaces. The residential portion would be comprised of 100 multi-family units, including 3 live/work units, 49 studio apartments, 36 one-bedroom apartments, and 12 two-bedroom apartments. Of the 100 units, 9 will be set aside for very low income. The Project would include approximately 81,224 total square feet of building area and approximately 10,300 square feet of open space, including a gym, lounge, community room, common roof deck, and two courtyards. The Project Site would have full-access driveway to the parking garage from the alley way located along the southern boundary of the Project Site. The following approvals may be included as part of the project: (1) Site Plan Review; (2) Director’s Determination for the West Pico Boulevard Community Design Overlay Plan; (3) Density Bonus Compliance with: (a) on-menu incentive to increase the allowable floor area from 1.5 to 1 to 3 to 1 and to increase the height from 45-feet to 56 feet on the portion of the building fronting Pico Boulevard and (b) off-menu incentives/waiver of development standards to waive transitional height limitations) for the back portion of the building within 100-feet from the nearest R-1 zoned property and to allow five stories in lieu of the permitted three stories; (4) Adoption of the Initial Study/Mitigated Negative Declaration; and (5) Grading/Building Permits.		
ENVIRONMENTAL SETTING: The project site is relatively flat, comprised of four parcels, and is located on the south side of Pico Boulevard between Bundy Drive and Granville Avenue. The Project Site is surrounded by commercial uses, multi-family uses, and surface parking. Directly west of the Project Site is a one-story restaurant, Chan Dara. Just beyond Chan Dara is a two-story commercial building with several retail uses. Northwest of the Project Site, across Pico Boulevard, are one-story commercial uses, including a sushi restaurant and several animal related retail uses. North of the Project Site, across Pico Boulevard, is a one-story strip mall containing a laundry mat, food-mart, massage parlor, Goodwill donation center, and a drycleaners. Northeast of the Project Site, across Pico Boulevard, are several commercial uses located in one-story buildings. These uses include a tutoring center, Tutoring Club, a nursery school, Little Village Nursery School, and a commercial business, Delta Graphics. Directly east of the Project Site, across an unnamed alleyway, is a two-story commercial use, consisting of a carpet and window treatment business, Home. Further east of the Project Site are additional two-story commercial uses consisting of an office use and a dive shop. Southwest, south, and southeast of the Project Site, across an unnamed alleyway, is a single-family neighborhood. Further details regarding the Project Site and immediate vicinity are found in the Initial Study, Section II. Project Description.		

PROJECT LOCATION: 11916 West Pico Boulevard		
COMMUNITY PLAN AREA: Palms-Mar Vista-Del Rey		AREA PLANNING COMMISSION: West Los Angeles
STATUS: <input type="checkbox"/> Preliminary <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> ADOPTED in 1997		CERTIFIED NEIGHBORHOOD COUNCIL: West Los Angeles
EXISTING ZONING: [Q]C2-1VL-CDO	MAX DENSITY ZONING: FAR 1.5:1	LA River Adjacent: No
GENERAL PLAN LAND USE: General Commercial	MAX. DENSITY PLAN: FAR 1.5:1	
PROJECT DENSITY: 3:1		

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

 _____ Signature	City Planning Associate _____ Title	213-978-1382 _____ 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 than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact."

The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).

5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures 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.

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

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

Background

PROPONENT NAME:
ADC Real Estate Group, LTD.

PHONE NUMBER:
(818) 871-2920

APPLICANT ADDRESS:
27200 Agoura Road, Suite 201
Calabasas, CA 91301

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:

PROPOSAL NAME (If Applicable):
Amoroso On Pico

		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 ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
I. AESTHETICS					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY					
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 GAME OR U.S. FISH AND WILDLIFE SERVICE ?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (INCLUDING, BUT NOT LIMITED TO, MARSH VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES					
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	STRONG SEISMIC GROUND SHAKING?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv.	LANDSLIDES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c.	BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GREENHOUSE GAS EMISSIONS					
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY					
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DEplete GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
X. LAND USE AND PLANNING					
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. PUBLIC SERVICES					
a.	FIRE PROTECTION?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	POLICE PROTECTION?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	SCHOOLS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	PARKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	OTHER PUBLIC FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVII. UTILITIES					
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	DOES THE PROJECT HAVE IMPACTS WHICH ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY CONSIDERABLE? ("CUMULATIVELY CONSIDERABLE" MEANS THAT THE INCREMENTAL EFFECTS OF AN INDIVIDUAL PROJECT ARE CONSIDERABLE WHEN VIEWED IN CONNECTION WITH THE EFFECTS OF PAST PROJECTS, THE EFFECTS OF OTHER CURRENT PROJECTS, AND THE EFFECTS OF PROBABLE FUTURE PROJECTS).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as ENV-2015-2210-MND and the associated case(s), CPC-2015-2209-DB-CDO-SPR. Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impacts(s) on the environment (after mitigation) **will not:**

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in Room 621, 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 EIR Unit, City Hall, 200 N Spring Street, Room 763. 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:
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REGULATORY COMPLIANCE MEASURES

Air Quality (Construction)

- RC 3-1** All unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 61 percent.

MITIGATION MEASURES

Aesthetics

- I-120** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.
- I-130** The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

Biological Resources (Operational)

To ensure that impacts related to existing vegetation are reduced to a less than significant level, the following mitigation measure is recommended:

- IV-90** Removal of trees in the public right-of-way requires approval by the Board of Public Works.

The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).

The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.

Trees shall be planted in the adjacent public right-of-way at a ratio of one tree for every thirty (30) feet of lot frontage or to the satisfaction of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Geology and Soils (Strong Seismic Ground Shaking)

To ensure that geology and soil impacts regarding strong seismic ground shaking are reduced to the maximum extent practicable, the following mitigation measure is recommended:

- VI-20** The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:

- a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
- b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.
- c. A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.
- d. "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.
- e. "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.
- f. Movement and removal of approved fencing shall not occur without prior approval by LADBS.

Green House Gas Emissions (Operation)

Short-term greenhouse gas emissions would be less than significant. Nonetheless, the following mitigation measure is proposed to reduce impacts to the maximum extent feasible:

- VII-10** Only low- and non-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the Project.

Any new construction shall include 20 percent of parking spaces set aside for EV ready parking.

Land Use

To ensure that impacts related to annual particulate exposures from the reentrainment of paved roadway dust for residents located on floors 1 through 5 or reduced to a level of insignificance, the following mitigation measure is recommended:

- III-50** Installing and maintaining air filtration systems with efficiencies equal to or exceeding Minimum Efficiency Reporting Values (MERV) of 11 (MERV 11) as defined by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 (refer to Appendix D of this IS/MND).

XII-60 Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

Noise (Construction)

Noise impacts during construction may affect adjacent sensitive uses. However, this potentially significant impact would be mitigated to a less than significant level by the following mitigation measures:

XII-20 Construction and demolition shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

The project developer shall install a temporary noise control barrier around the construction site abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent multifamily residential structures with a goal of a reduction of 10 dBA. The barrier shall be a similar height to the abutting residential buildings. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and paving activities are complete.

Noise (Residential)

The project itself would not expose sensitive receptors to substantial noise levels. However, given that existing ambient noise levels in the vicinity of the Pico Boulevard could expose future occupants of the site to noise levels that exceed the City's noise standards, the following mitigation measures have been prescribed to reduce noise impacts to future occupants to the maximum extent practicable.

XII-40 Concrete, not metal, shall be used for construction of parking ramps.

The interior ramps shall be textured to prevent tire squeal at turning areas.

Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

Public Services (Fire)

The demand for fire protection services would increase as a result of project implementation. To ensure that the project complies with the design standards within the City's Fire and Building Codes, the following mitigation measure is recommended:

- XIV-10** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Public Services (Police)

The new permanent residential and temporary daytime populations associated with the project would increase the demand for police protection services in the area. To ensure that the project would reduce impacts to police protection services to the maximum extent practicable, the following mitigation measures are recommended:

- XIV-20** Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.
- XIV-30** The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

Transportation

XVI-80 Pedestrian Safety

- 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 or blockage, at all times.
- Temporary pedestrian facilities shall 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 shall be provided where pedestrians are exposed to potential injury from falling objects.
- 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.

Cumulative Impacts

There may be environmental impacts, which are individually limited, but significant when viewed in connection with the effects of past projects, other current project, and probably future projects. However, these cumulative impacts will be mitigated to a less than significant level through compliance with the above mitigation measures.

The conditions outlined in this proposed mitigated negative declaration which are not already required by law shall be required as condition(s) of approval by the decision-making body except as noted on face page of this document. Therefore, it is concluded that no significant impacts are apparent which might result from this Project's implementation.

I. INTRODUCTION

1. INTRODUCTION

The subject of this Initial Study (IS) is the proposed 11916 Pico Mixed-Use Project (the "Project"). The Project consists of the development of a multi-family residential development with 100 dwelling units, including nine "very-low income" units on the upper levels, 2,871 square feet of restaurant uses on the ground floor, and 129 parking spaces located within three levels of subterranean parking, and 200 bicycle parking spaces. The residential building would include 3 live/work units, 49 studio apartments, 36 one-bedroom apartments, and 12 two-bedroom apartments. The 0.631-acre Project Site is comprised of four parcels currently developed with approximately 13,671 square feet of one-story commercial uses, and a vacant two-story four-unit 1,900 square foot multi-family use, as well as a surface parking area. The Project Site is located in the City of Los Angeles in the Palms-Mar Vista-Del Rey Community Plan Area. The Project applicant is ADC Real Estate Group, LTD. A detailed description of the Project is contained in Section II (Project Description). The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

2. PROJECT INFORMATION

Project Title: 11916 Pico Mixed-Use Project

Project Applicant: ADC Real Estate Group, LTD

Project Location: 11916-11936 West Pico Boulevard, Los Angeles, CA 90064

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

3. PURPOSE AND ORGANIZATION 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.

CEQA Guideline 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) 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.
- (e) 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.
- (f) 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.

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, 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.

Acronyms and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

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 an MND shall be prepared for the Project.

II. PROJECT DESCRIPTION

1. ENVIRONMENTAL SETTING

A. Project Location

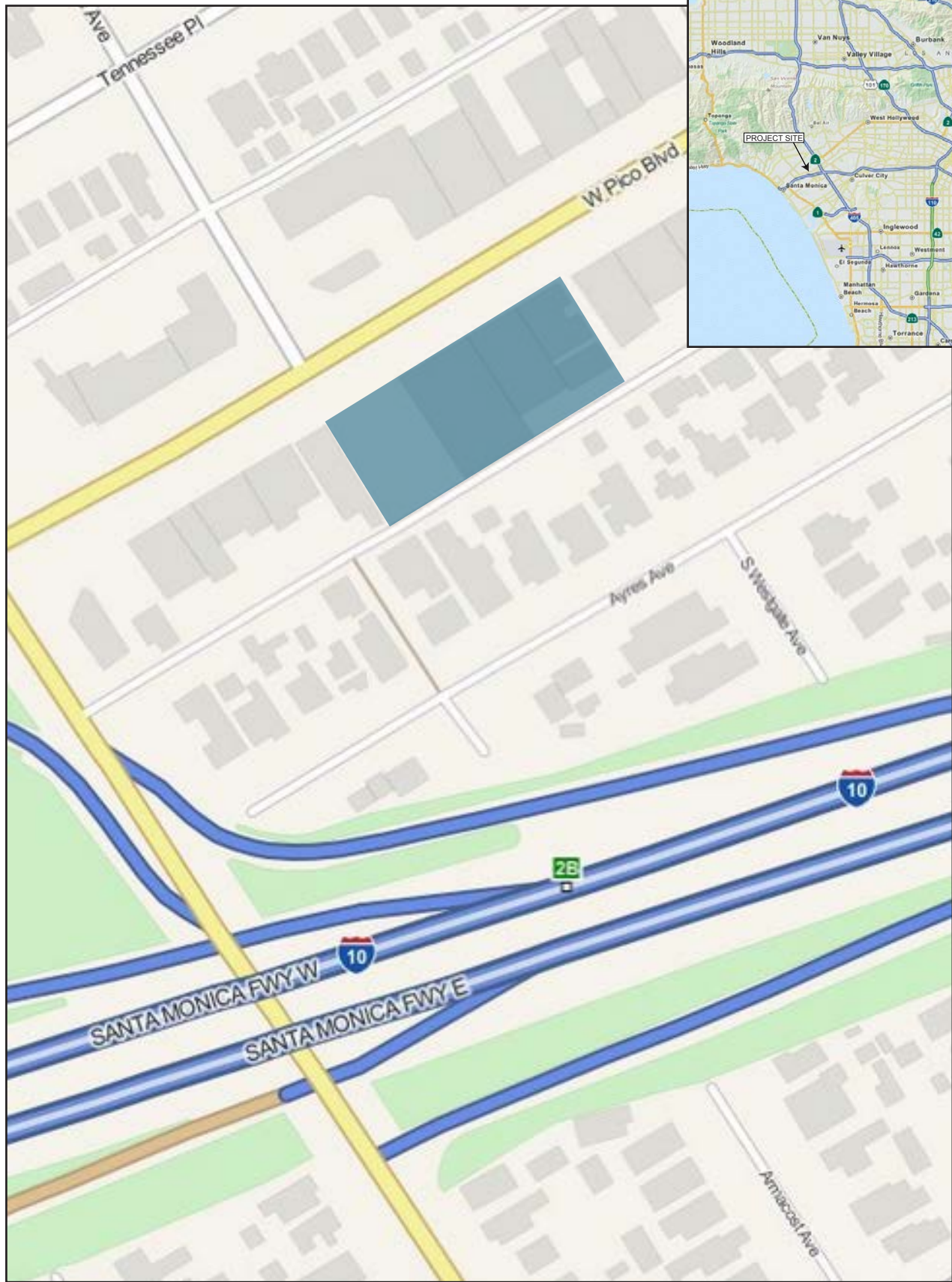
The 0.631-acre Project Site is located at 11916-11936 West Pico Boulevard, in the Pals-Mar Vista-Del Rey Community Plan Area of the City of Los Angeles within Council District 11 (see Figure II-1 [Regional and Project Vicinity Map] and Figure II-2 [Aerial View of the Project Site]). The Project Site encompasses all of the addresses and assessor parcel numbers (APN) listed in Table II-1 (Project Site Addresses and Assessor Parcel Number).

Table II-1
Project Site Addresses and Assessor Parcel Number

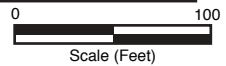
Address	APN	Use
11928 West Pico Boulevard 11932 West Pico Boulevard 11936 West Pico Boulevard	4259-039-011	8,250 sf Parking Lot
11918 West Pico Boulevard 11920 West Pico Boulevard	4259-039-010	7,425 sf Commercial
11916 West Pico Boulevard	4259-039-009	4,500 sf Commercial
11900 West Pico Boulevard 11900 ½ West Pico Boulevard 11902 West Pico Boulevard 11902 ½ West Pico Boulevard	4259-039-008	1,746 sf Commercial 1,900 sf Residential

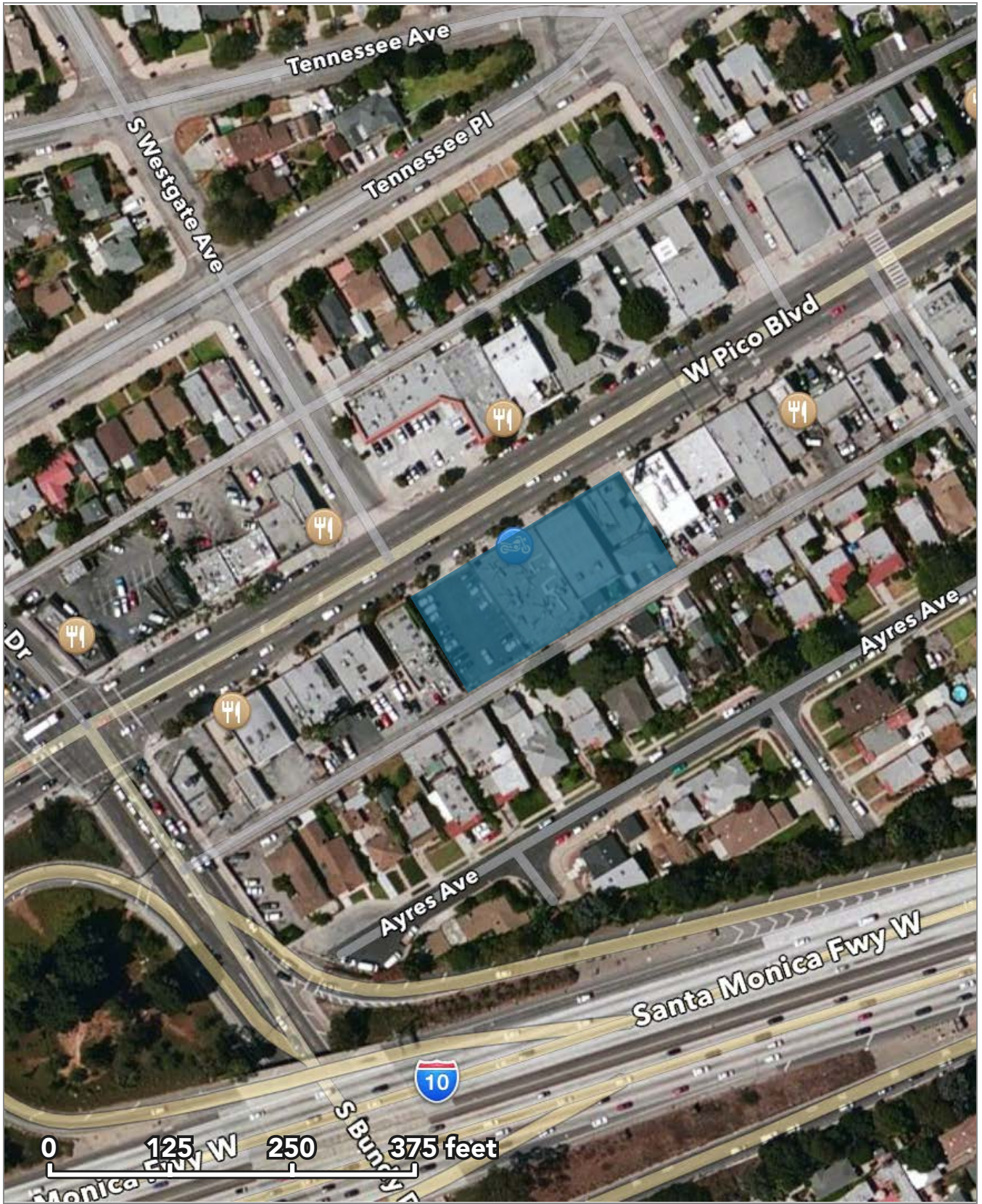
Regional access to the Project Site is provided by the Santa Monica (I-10) Freeway approximately 0.07 mile south of the Project Site, and the San Diego (I-405) Freeway approximately 0.70 mile east of the Project Site. Local access to the Project Site is provided by, but is not limited to, the following roadways: West Pico Boulevard, South Bundy Drive, and South Barrington Avenue. The Project Site is served by several bus lines operated by the Santa Monica Big Blue Bus, including Line 7, a local-stop line, and Rapid Line 7, a limited stop express line, both of which provide service directly to the Project Site along Pico Boulevard, by Line 6, which runs along Pico Boulevard west of Bundy Drive and Bundy Drive south of Pico Boulevard, and Line 14, which travels through the project vicinity along Bundy Drive/Centinel Avenue. Overall, there are six bus stops within at least 1,500 feet of the Project Site:

- Pico WB & Bundy NS (Big Blue Bus Route 7): 266 feet west of the Project Site on Pico Boulevard;
- Bundy NB & Pico FS (Big Blue Bus Route 14): 440 feet northwest of the Project Site on Bundy Drive;
- Pico EB & Bundy NS (Big Blue Bus Rapid 7/Route 7): 568 feet west of the Project Site on Pico Boulevard;
- Pico EB & Barrington NS (Big Blue Bus Route 7): 1,072 feet east of the Project Site on Pico Boulevard;
- Pico EB & Centinela FS (Big Blue Bus Route 7): 1,158 feet southwest of the Project Site on Pico Boulevard; and
- Pico WB & Barrington NS (Big Blue Bus Route 7): 1,332 feet northeast of the Project Site on Pico Boulevard.



■ Project Site
 Source: Mapquest, February 2015.





■ Project Site
Source: Mac Maps, February 2015.

A. Description of Surrounding Area

The Project Site is located in an urbanized setting two blocks north of the Santa Monica (I-10) Freeway in West Los Angeles. The Project Site is surrounded by commercial uses, single-family uses, multi-family uses, and surface parking. Directly west of the Project Site is a one-story restaurant, Chan Dara. Just beyond Chan Dara is a two-story commercial building with several retail uses. Northwest of the Project Site, across Pico Boulevard, are one-story commercial uses, including a sushi restaurant and several pet supply retail uses. North of the Project Site, across Pico Boulevard, is a one-story strip mall containing a laundry mat, food-mart, massage parlor, Goodwill donation center, and a drycleaners. Northeast of the Project Site, across Pico Boulevard, are several commercial uses located in one-story buildings. These uses include a tutoring center, Tutoring Club, a nursery school, Little Village Nursery School, and a commercial business, Delta Graphics. Directly east of the Project Site, across an unnamed alleyway, is a two-story commercial use, consisting of a carpet and window treatment business, Home. Further east of the Project Site are additional two-story commercial uses consisting of an office use and a dive shop. Southwest, south, and southeast of the Project Site, across an unnamed alleyway, is a single-family neighborhood. Various photographs of the Project Site and its immediate surroundings are shown in Figures II-3 through II-7.

Table II-2 (Open Space Areas) depicts a list of the nearest open space areas to the Project Site within a two mile radius.

Table II-2
Open Space Areas

Open Space	Distance from Project Site	Location
Stoner Recreation Center	0.96 mile northwesterly	1835 South Stoner Avenue
Clover Park	1.26 miles southwesterly	2600 Ocean Park Boulevard
Airport Park	1.30 miles southerly	3201 Airport Avenue
Horton Plaza Park	1.38 miles westerly	Broadway & 26 th Street
Virginia Avenue Park	1.42 miles westerly	2200 Virginia Avenue
Mar Vista Recreation Center	1.64 miles southeasterly	11430 Woodbine Street
Douglas Park	1.70 miles westerly	25 th & Wilshire Boulevard

A. Existing Site Zoning / Land Use

As shown in Figure II-2 (Aerial View of the Project Site), the Project Site encompasses four parcels, fronting West Pico Boulevard, Chan Dara Pico Restaurant to the west, a two-story commercial use to the east, and an alleyway to the south. The Project Site is comprised of an existing surface parking lot, three one-story commercial structures, and a two-story four-unit multi-family use. The Project Site is located within the Palms-Mar Vista-Del Rey Community Plan area that designates the Project Site for General Commercial land uses and is zoned [Q]C2-1VL-CDO. The C2 is defined as a Commercial zone and the "1VL" refers to Height District 1 "Very Limited", which restricts building heights to three stories and a maximum of 45 feet in height. Furthermore, the Project Site is located in a Community Design Overlay District (CDO), which ensures that development within communities is in accordance with community design policies adopted in the Community Plan. The Project will be requesting on-menu density bonus incentives to increase the allowable floor area from 1.5:1 to 3:1 and to increase the height from 45-foot



View 1: View of the Project Site, looking southeast from West Pico Boulevard.



View 2: View of the Project Site, looking south from West Pico Boulevard.

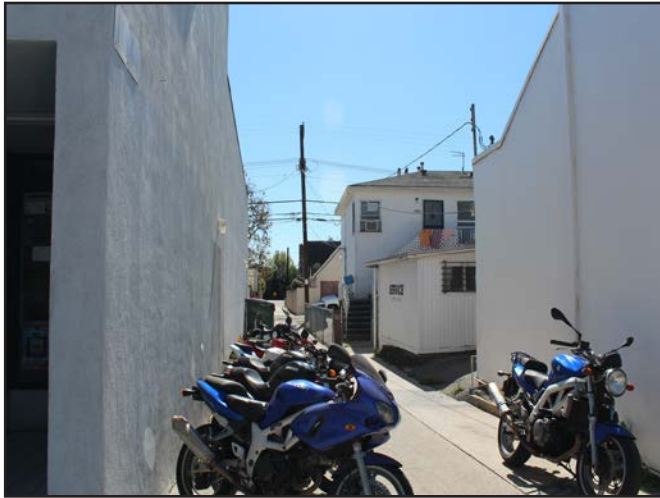


View 3: View of the Project Site, looking southwest from West Pico Boulevard.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, March 2015.



View 4: View of the multi-family building on the Project Site, looking southwest from West Pico Boulevard.



View 5: View of the Project Site, looking north from the rear alley way.



View 6: View of the Project Site, looking northwest from the rear alley way.



 PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, March 2015.



View 1: Restuarant Chan Dara and commercial uses to the west of the Project Site.



View 2: Commercial uses on the north side of West Pico Boulevard.



View 3: Commercial strip mall on the north side of West Pico Boulevard.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, March 2015.



View 4: Commercial uses and a nursery school on the north side of West Pico Boulevard.



View 5: Two-story commercial use directly east of the Project Site.



View 6: Commercial uses east of the Project Site.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, March 2015.



View 7: Single-family residential uses directly south of the Project Site.



View 8: Single-family residential uses directly south of the Project Site.



View 9: Single-family residential uses directly south of the Project Site.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, March 2015.

to 56-feet on the portion of the building fronting Pico Boulevard and waiver of development standards to waive transitional height limitations for the back portion of the building within 100-feet from the nearest R-1 zoned property and to allow five stories in lieu of the permitted three stories.

2. PROJECT CHARACTERISTICS

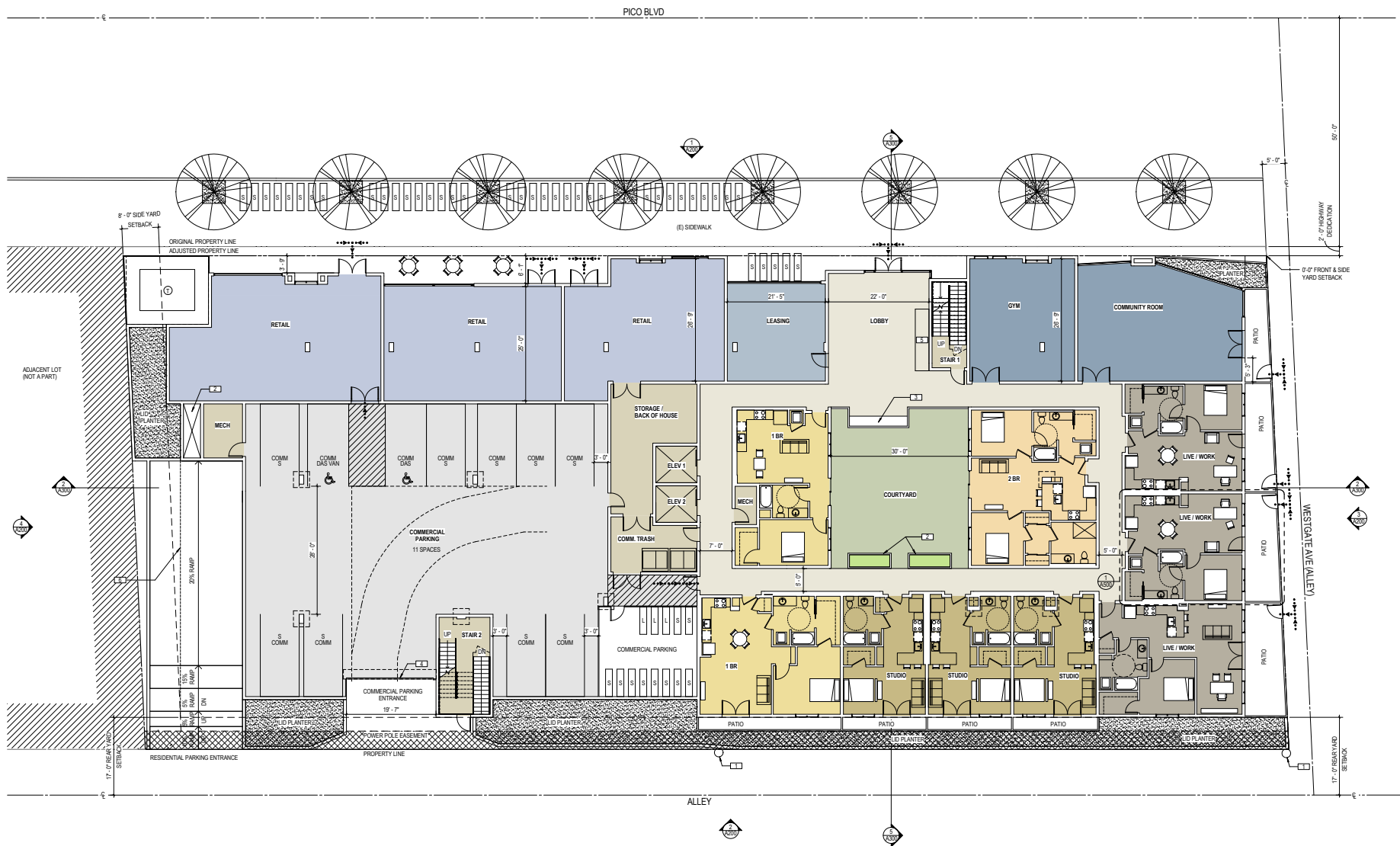
As shown in Figures II-8 to II-19, the Project involves the removal of the existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family use and the construction of a five-story, 56-foot tall building, which would include a total of 100 dwelling units on the upper levels, 2,848 square feet of restaurant uses on the ground floor, 129 parking spaces, and 200 bicycle parking spaces located within the lower levels. The residential portion would be comprised of

100 multi-family units, including 3 live/work units, 49 studio apartments, 36 one-bedroom apartments, and 12 two-bedroom apartments (see Table II-3 (Project Development Summary)). Of the 100 units, 9 will be set aside for very low income. The Project would extend up to approximately 56 feet high (five stories) in height on the portion of the building facing Pico Boulevard and would step down to approximately 45-feet on the rear portion of the building facing the residential uses directly south of the Project Site. The Project would include approximately 81,224 total square feet of building area and approximately 10,300 square feet of open space, including a spa, a gym, a lounge, a community room, common roof deck, and a courtyard.

The Project proposes to provide a total of approximately 129 on-site vehicular parking spaces, including 11 restaurant spaces, and 118 residential parking spaces, located within the on-site parking structure. The Project would also provide a total of approximately 200 bicycle spaces, including 90 restaurant (six long-term and 84 short-term) and 110 residential (100 long-term and 10 short-term) spaces. Construction of the Project is anticipated to begin in January 2016 and would take place over a period of approximately 18 months.

**Table II-3
Project Development Summary**

Size	Total
Residential Units	
<i>Live/Work</i>	3
<i>Studio</i>	49
<i>1 Bedroom</i>	36
<i>2 Bedroom</i>	12
Total Units	100
Total Parking	118
Total Bicycle	110
Commercial	
<i>Restaurant</i>	2,871 sf
Total Commercial	2,871 sf
Total Parking	11
Total Bicycle	90
Total Open Space	10,300 sf
<i>Source: KFA 2015.</i>	



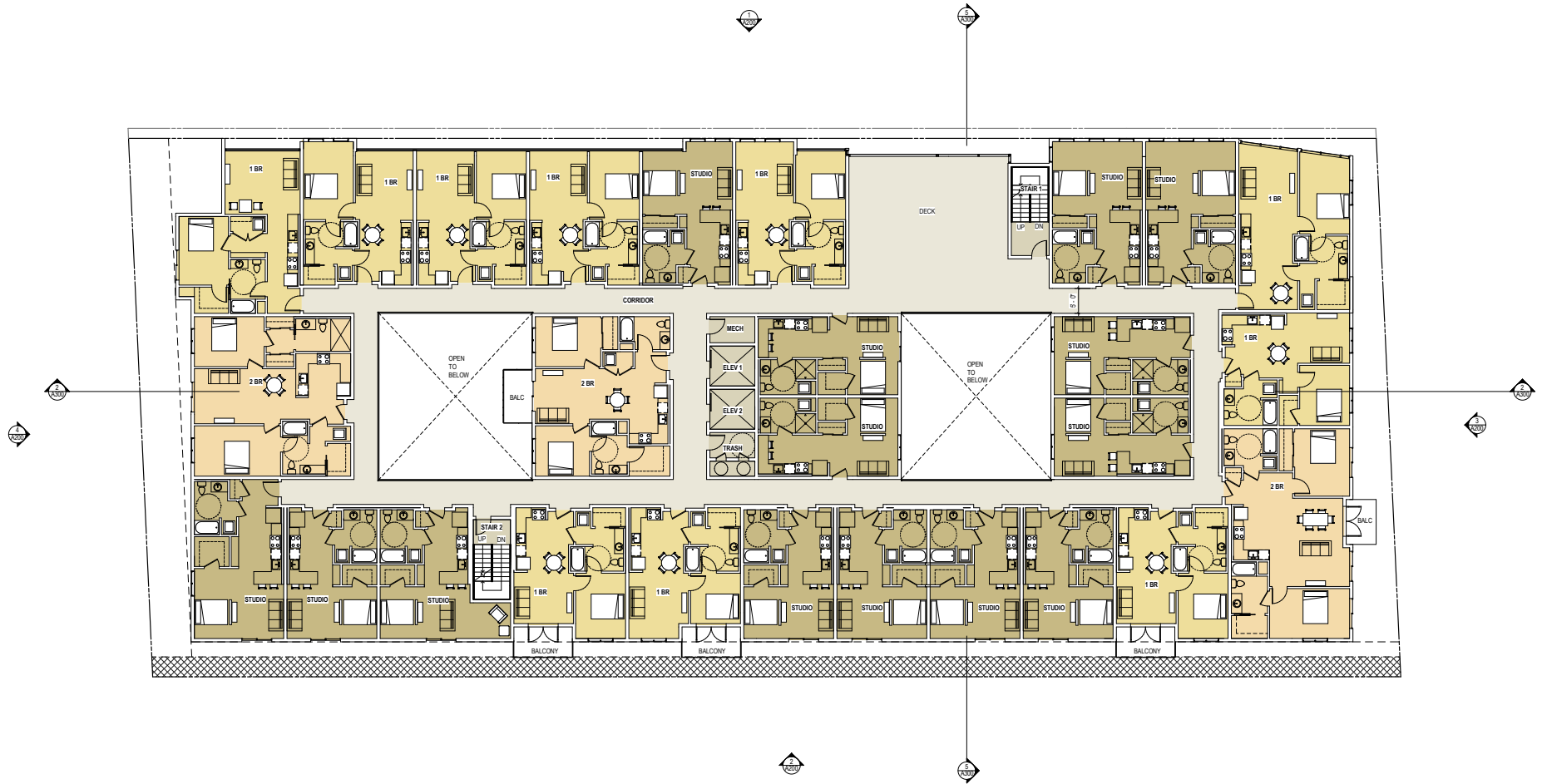
Source: KFA, April 2015.



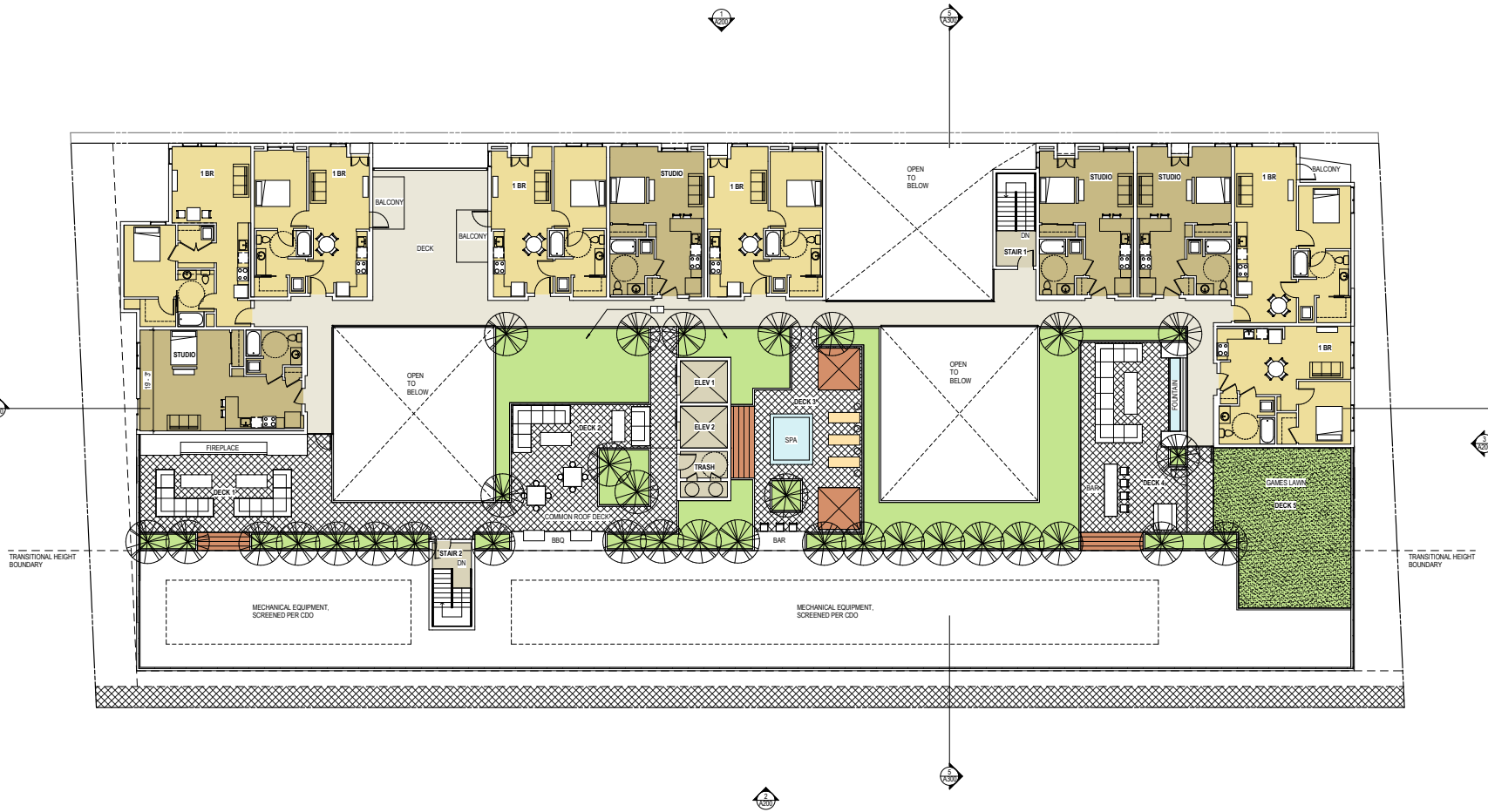
Source: KFA, April 2015.



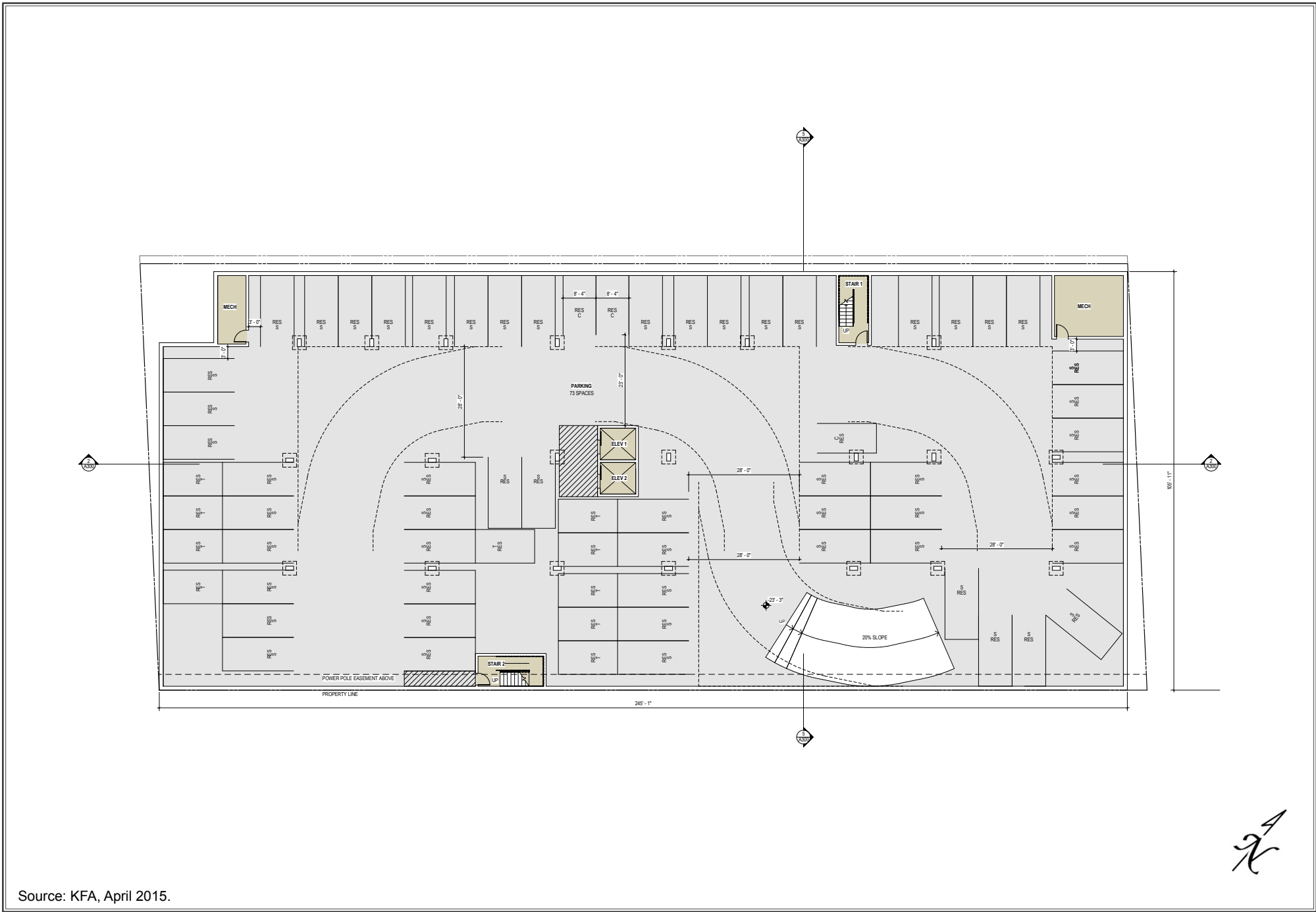
Source: KFA, April 2015.



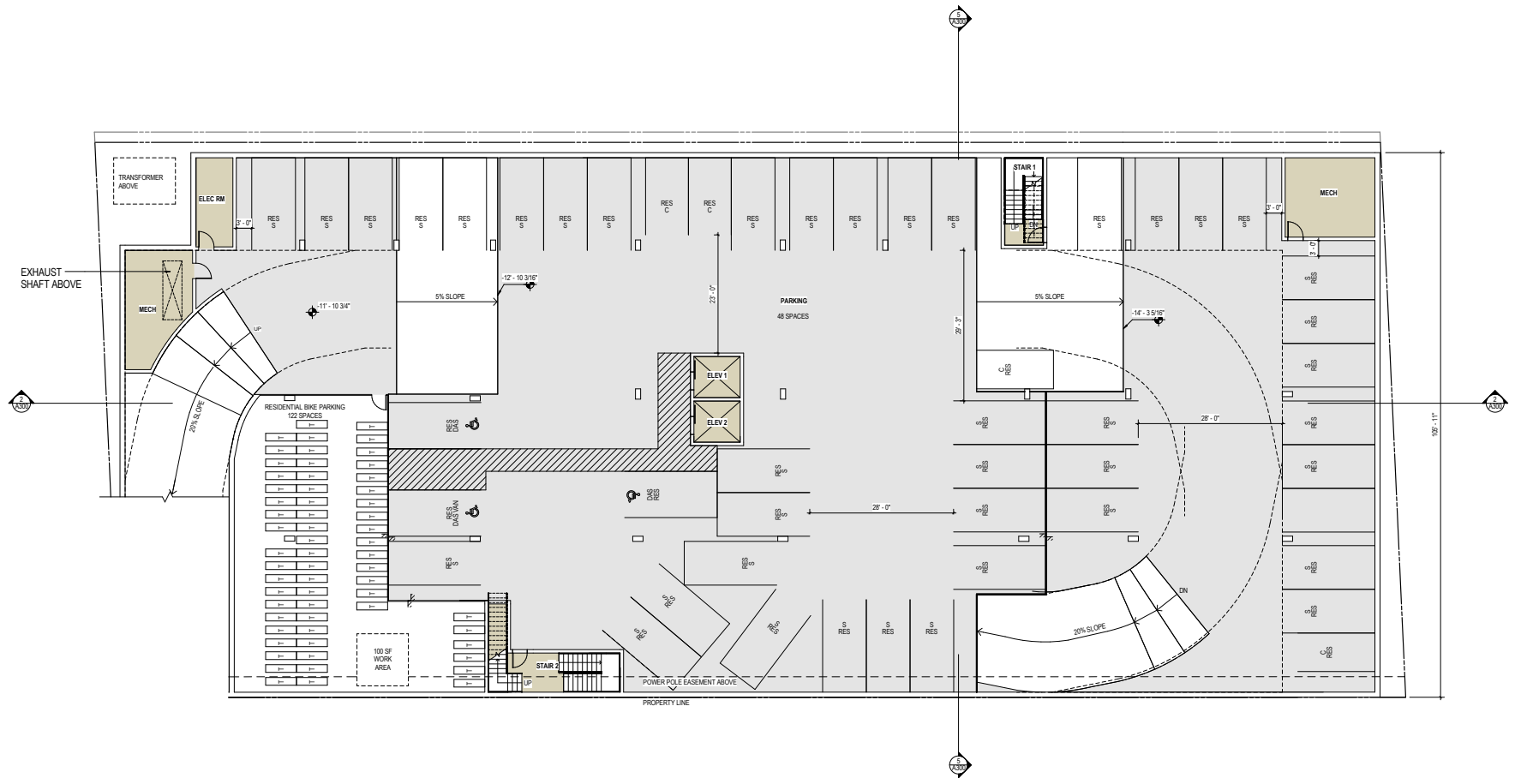
Source: KFA, April 2015.



Source: KFA, April 2015.

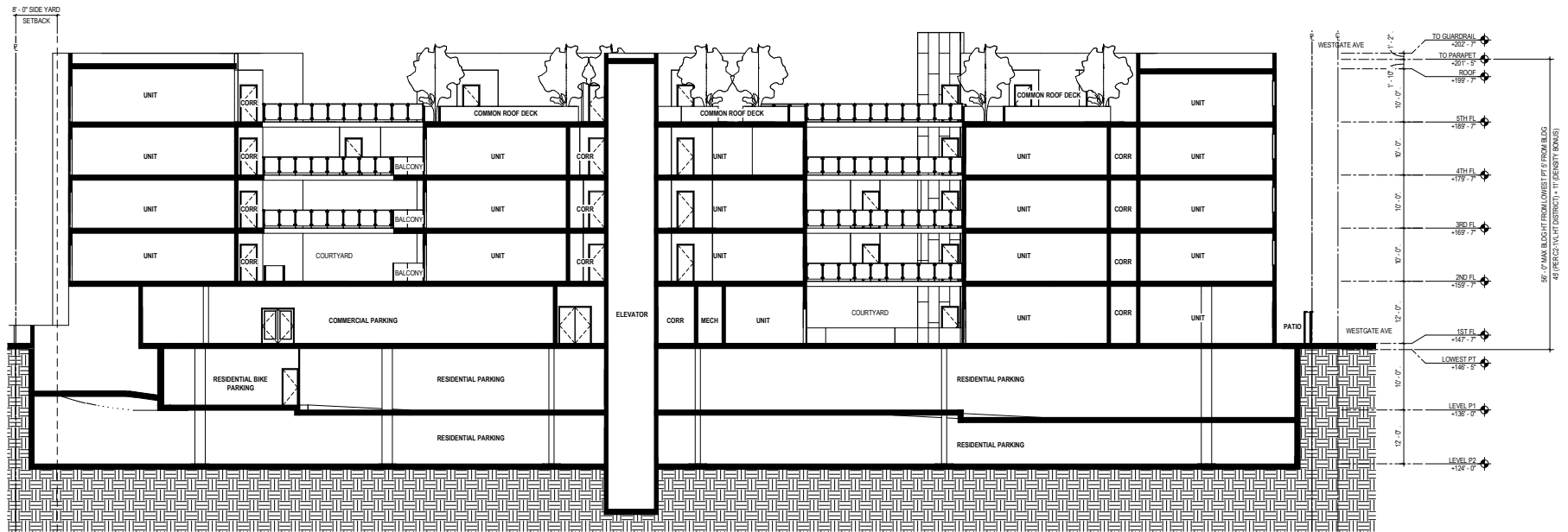


Source: KFA, April 2015.



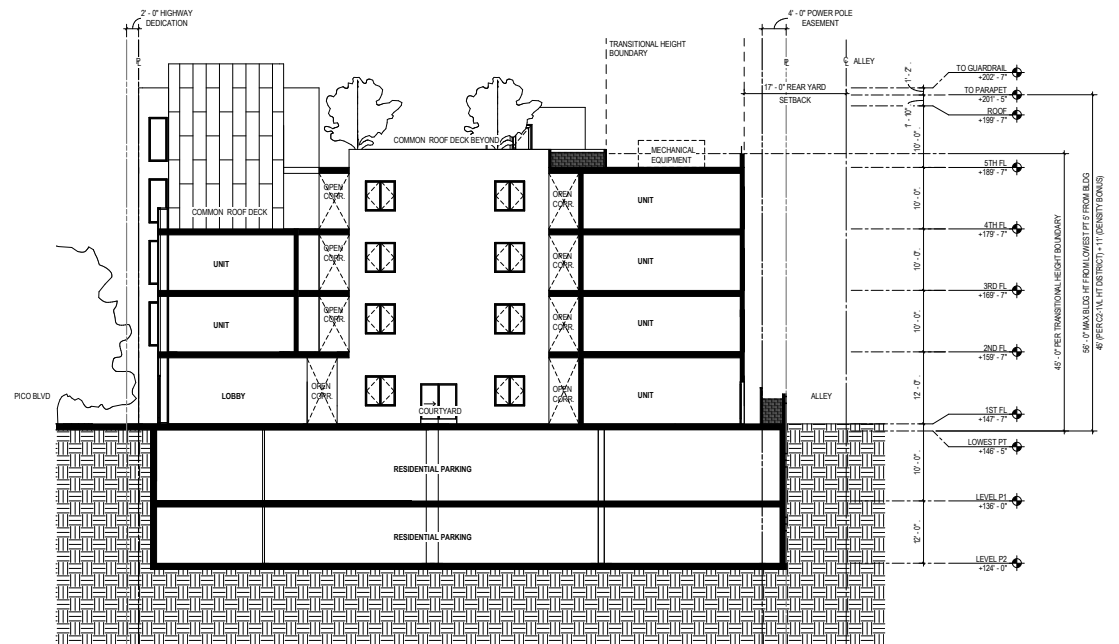
Source: KFA, April 2015.





LONGITUDINAL SECTION

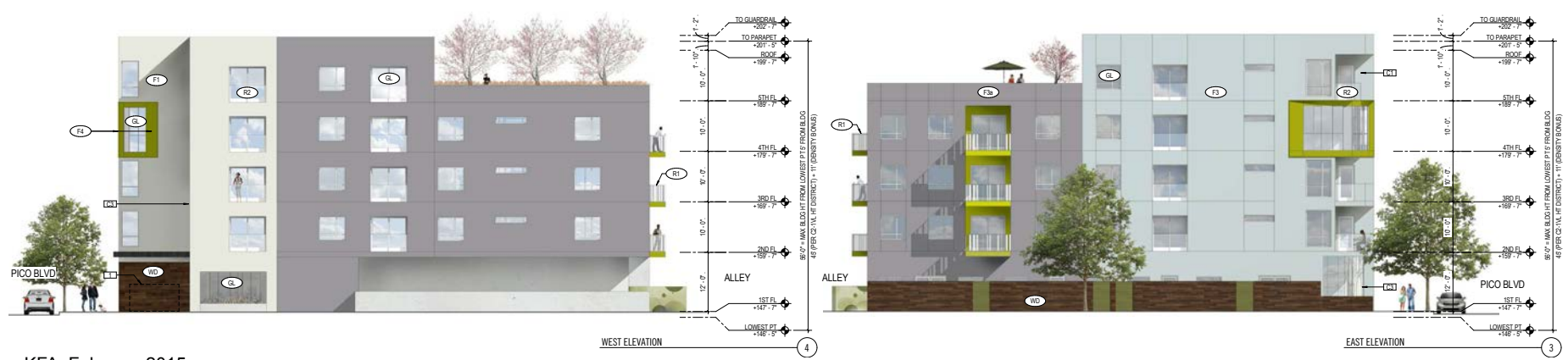
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TRANSVERSE SECTION

5

Source: KFA, April 2015.



Source: KFA, February 2015.



Source: KFA, February 2015.



Source: KFA, February 2015.



Source: KFA, February 2015.

III. 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 the Initial Study Checklist. The thresholds of significance are based on the CEQA Guidelines Appendix G Environmental Checklist Form and the City of Los Angeles L.A. CEQA Thresholds Guide 2006, and other sources as noted.¹

IMPACT ANALYSIS

1. AESTHETICS

Existing Conditions

The following is a summary of existing conditions with respect to aesthetics within the Project vicinity.

Visual Character

The Project site is relatively flat, with a gentle slope to the south and is currently occupied by three one-story buildings, one two-story building, and a surface parking lot.

The Project Site is located in an urbanized setting two blocks north of the Santa Monica (I-10) Freeway in West Los Angeles. The Project Site is surrounded by commercial uses, single-family uses, multi-family uses, and surface parking. Directly west of the Project Site is a one-story restaurant, Chan Dara. Just beyond Chan Dara is a two-story commercial building with several retail uses. Northwest of the Project Site, across Pico Boulevard, are one-story commercial uses, including a sushi restaurant and several animal related retail uses. North of the Project Site, across Pico Boulevard, is a one-story strip mall containing a laundry mat, food-mart, massage parlor, Goodwill donation center, and a drycleaners.

¹ In 2010, the CEQA Guidelines were revised to include greenhouse gas emissions, forestry resources, and changes to transportation/traffic. As directed by SB97, the Natural Resources Agency adopted Amendments to the CEQA Guidelines for greenhouse gas emissions on December 30, 2009. On February 16, 2010, the Office of Administrative Law approved the Amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. These amendments became effective on March 18, 2010, website: <http://ceres.ca.gov/ceqa/guidelines/>. Although the City of Los Angeles has updated the checklist to reflect the Guidelines changes, the CEQA Thresholds Guide, which was developed prior to the changes, has not been updated.

Northeast of the Project Site, across Pico Boulevard, are several commercial uses located in one-story buildings. These uses include a tutoring center, Tutoring Club, a nursery school, Little Village Nursery School, and a commercial business, Delta Graphics. Directly east of the Project Site, across an unnamed alleyway, is a two-story commercial use, consisting of a carpet and window treatment business, Home. Further east of the Project Site are additional two-story commercial uses consisting of an office use and a dive shop. Southwest, south, and southeast of the Project Site, across an unnamed alleyway, is a single-family neighborhood. Various photographs of the Project Site and its immediate surroundings are shown in Figures II-3 through II-7.

The Project Site is developed with a surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family use. The Project Site is located within the Palms-Mar Vista-Del Rey Community Plan area that designates the Project Site for General Commercial land uses and is zoned [Q]C2-1VL-CDO. The C2 is defined as a Commercial zone and the "1VL" refers to Height District 1 "Very Limited", which restricts building heights to three stories and a maximum of 45 feet in height. Furthermore, the Project Site is located in a Community Design Overlay District (CDO), which ensures that development within communities is in accordance with community design policies adopted in the Community Plan.

Views Of and Toward the Project Site

Public vantage points are primarily available from area roadways, most notably Pico Boulevard, South Westgate Avenue, and an existing east/west-oriented two-way commercial/residential access alley, bordering the Project Site on the south. Due to the low-rise nature of the existing uses on the Project Site, coupled with the surrounding development, distant views of the Project Site are not available.

Views Through the Project Site

Due to the location of the Project Site and the surrounding development, there are no expansive views through the Project Site to scenic or visual resources. For the most part, intermittent stretches of the Santa Monica Mountains are available between the existing development from the access alley, bordering the Project Site on the south, looking north. Additional views of the Santa Monica Mountains would potentially be available from the upper floors of buildings located in the site vicinity, including two-story multi-family uses located directly south of the Project Site, across the alley. However, these buildings are only two-stories high and would have limited views to the north that are blocked by existing structures, including the high-rise structure located three blocks north of the Project Site, along Olympic Boulevard.

Lighting

The Project Site is located in a well-lit, urban area where there is extensive ambient nighttime lighting including street lighting, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows), signage and vehicle headlights.

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

Less Than Significant Impact. For the purpose of this Initial Study, 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 nearest designated scenic highway to the Project Site is San Vicente Boulevard, approximately 2.40 miles northwest of the Project Site.² However, the Project is not located along or within scenic vistas nor viewsheds of this scenic highway. There would be no impacts to city-designated scenic highways as a result of the buildout of the Project.

There are no significant natural features (such as trees, rock outcroppings, bodies of water, or substantial stands of native vegetation) found on the Project Site. In addition, there are no major open spaces found on the Project Site and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) on the Project Site. There is no vegetation and there are no protected trees as defined by the City of Los Angeles Protected Tree Ordinance No. 177,404

² *California Scenic Highway Mapping System, State of California Department of Transportation, website: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>, and City of Los Angeles, Department of City Planning, Transportation Element of the General Plan, Scenic Highways, Map E, September, 1999.*

(i.e., native oaks [*Quercus sp.*], western sycamore [*Platanus racemosa*], Southern California black walnut [*Juglans californica*] and California bay [*Umbellularia californica*]) on the Project Site. The Project includes landscaping, which would include various shrubs, ground cover plants, and trees. Thus the planting of landscaping would not degrade the visual qualities of the Project Site and surrounding area and would actually improve them. Impacts to on-site scenic resources would be less than significant.

Under the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact occurs only when the Project adversely affects the public view of a scenic vista, and therefore, impacts to private views are not considered to be significant under the *Thresholds Guide*. Nevertheless, private views from nearby residential buildings are valued by existing residents, and an analysis of the Project's impacts to private views is included herein.

The Project Site does not contain any unique scenic vistas, as it is entirely comprised of a surface parking lot, a multi-family use, and commercial low-rise buildings. Visual resources within the vicinity of the Project Site with the potential to be considered scenic include the views of the Santa Monica Mountains. This scenic vista, as well as views from public and private vantage points and the Project's potential to introduce incompatible elements or to obstruct these views, is discussed in further detail below.

Views of the Santa Monica Mountains

As shown in Figures II-3 through II-7, at the street level, views are limited predominantly to those from Pico Boulevard, South Westgate Avenue, and an existing east/west-oriented two-way commercial/residential access alley bordering the Project Site on the south. The Santa Monica Mountains are located approximately 2.5 miles north-northwest of the Project Site. Public views of the Santa Monica Mountains are available to pedestrians and vehicular traffic traveling north on South Westgate Avenue and east–west along Pico Boulevard and the alley bordering the Project Site on the south. However, the existing viewsheds are defined primarily by existing urban development.

Depending on a viewer's specific location, implementation of the proposed five-story residential building would obstruct some of the intermittent public views of the Santa Monica Mountains that are presently available to cars and pedestrians utilizing the alley located directly south of the Project Site. Existing public views of the Santa Monica Mountains from the alley are presently blocked from some locations by the existing commercial uses currently on the Project Site. Therefore, although the Project would introduce a new building that would block view lines through the Project Site from moving cars and pedestrians the overall change in views through the Project Site would be small compared to the existing views. From distant vantage points, the Project would not block a substantial portion of the expanse of potential views of the Santa Monica Mountains. There are no significant view resources available while traveling southbound on Westgate Avenue. Therefore, Project impacts associated with scenic views of the Santa Monica Mountains would be less than significant.

The Project would partially obstruct existing private views of the Santa Monica Mountains from structures south of the Project Site. There are several two-story single-family residential uses located south of the Project Site on Ayres Avenue. The Project has the potential to obstruct private views from the second floor of these single-family uses. However, views to the north are limited by the existing urban landscape and commercial structures. Additionally, the thresholds within the *City of L.A. CEQA Thresholds Guide 2006* focus on public views and do not consider blockage of individual private views from commercial or residential properties to be a significant impact. Therefore, Project impacts associated with scenic views of the Santa Monica Mountains from these structures would be less than significant 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur only if scenic resources would be damaged and/or removed by development of a project.

There are no scenic resources, such as native California trees or rock outcroppings on the Project Site. The nearest designated scenic highway to the Project Site is San Vicente Boulevard, approximately 2.40 miles northwest of the Project Site.³ However, the Project is not located along or within the scenic vistas or viewsheds of this scenic highway. Therefore, the Project would not damage and/or remove any scenic resources within a State or City designated scenic highway. 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. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

General Character Significance Methodology

Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant aesthetic impact shall be made considering the following factors:

³ *California Scenic Highway Mapping System, State of California Department of Transportation, website: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>, and City of Los Angeles, Department of City Planning, Transportation Element of the General Plan, Scenic Highways, Map E, September, 1999.*

- 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
- Applicable guidelines and regulations.

The Project Site is located in an urbanized setting two blocks north of the Santa Monica (I-10) Freeway in West Los Angeles. The Project Site is surrounded by commercial uses, multi-family uses, and single-family uses varying from one to two stories in height, with high-rise buildings a short distance away (three blocks) extending up to eight stories. The Project would extend up to five stories high, which is two- to three-stories greater than the buildings that currently occupy the Project Site. Therefore, the Project would result in 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 Project would extend up to approximately 56 feet high (five stories) in height on the portion of the building facing Pico Boulevard and would step down to approximately 45-feet on the rear portion of the building facing the residential use directly south of the Project Site. Existing buildings in the immediate Project vicinity range from one- to two-stories in height, with buildings a short distance away (three blocks) extending up to eight stories. The Project would extend up to five stories high, which would be similar to buildings in the area. Although the Project would result in a change in building height from the existing conditions, it would not substantially contrast with the existing heights and character of the Project area in general. There are several buildings with similar heights in the Project area:

- A four-story commercial use, located approximately one block east of the Project Site, on the southeast corner of West Pico Boulevard and Granville Avenue;
- Monnette Regency, a four-story residential use, located approximately two blocks southeast of the Project Site at 2445 South Barrington Avenue;

- C-Pico, a four-story residential use, located approximately three blocks west of the Project Site at 12301 West Pico Boulevard;
- 11900 Olympic, an eight-story office building, located approximately three blocks north of the Project Site;
- A six-story commercial use, located approximately three blocks north of the Project Site at 11931 Olympic Boulevard;
- A four-story residential use, located approximately three blocks southeast of the Project Site, on the southeast corner of Ayres Avenue and Barrington Avenue; and
- A four-story residential use, located approximately three blocks southeast of the Project Site, on the northeast corner of Ayres Avenue and Barrington Avenue.

Considering the existing variety of building heights in the area, the height of the Project would not introduce an incompatible element to the existing visual character of the area. Therefore, the height of the Project would have a less-than-significant impact with respect to visual character and no mitigation measures are required.

Massing

As previously described, the existing buildings in the immediate vicinity of the Project Site extend from one- to two-stories in height, with buildings a short distance away (three blocks) extending up to eight stories. In addition to increased height, the Project would result in the construction of a building on the portion of the Project Site presently used for surface parking, thereby increasing the building mass on the Project Site. The resulting mid-rise residential building likely would be visually prominent from the surrounding area. This increased visibility would occur on nearby roadways and adjoining sidewalks, including Pico Boulevard, South Westgate Avenue, and an existing east/west-oriented two-way commercial/residential access alley bordering the Project Site on the south. Additionally, the greater height and mass would increase the visibility to the Project Site from nearby residential and commercial properties. Even with increased prominence, however, the Project would be visually integrated with the existing character of the area, which is an area predominantly characterized by commercial development. Moreover, the Project would be an urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted land use plans, including the Palms-Mar Vista-Del Rey Community Plan and the CDO (see Section 10 Land Use and Planning of this Initial Study).

The Palms-Mar Vista-Del Rey Community Plan limits the FAR on the Project Site to 1.5:1. The Project Site is further restricted by a "VL" Very Limited Height District, which restricts building heights to three stories and a maximum of 45 feet in height. The Project will be requesting to increase the allowable floor area from 1.5:1 to 3:1, to increase the height from 45-feet to 56-feet on the portion of the building fronting Pico Boulevard and to allow five stories in lieu of the permitted three stories. Considering the existing urban 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 and its surroundings. Therefore, the visual character impact associated with building mass would be less than significant and no mitigation measures are required.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by Project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational/parks, churches, schools, outdoor restaurants, and pedestrian areas have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive."

Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

The Project would extend up to approximately 56 feet high (five stories) in height on the portion of the building facing Pico Boulevard and would step down to approximately 45-feet on the rear portion of the building facing the residential use directly south of the Project Site.

As shown in Figure III-1, Summer Solstice Shadows, the Project would cast shadows to the west through the east during the Summer Solstice. At 9:00 AM, summer shadows from the Project would be cast in a westerly direction. The shadows would shade Pico Boulevard. At 12:00 PM, summer shadows from the Project would be cast in a northern direction. These shadows would shade a portion of the adjacent building to the north. As shown in Figure III-1, the sidewalk fronting the Project Site would be shaded. At 3:00 PM, summer shadows from the Project would be cast in an easterly direction. The shadows would shade the adjacent commercial building to the northeast and a portion of the alleyway. No sensitive land use would be shaded by the Project for more than four hours between the hours of 9:00 AM and 3:00 PM. Consequently, summer shadow impacts from the Project would be less than significant.

As shown in Figure III-2 (Winter Solstice Shadows), the Project would cast far-reaching shadows to the northwest and north during the Winter Solstice. At 9:00 AM, winter shadows from the Project would be cast in a northwesterly direction. These shadows would extend across Pico Boulevard and shade portions of the commercial complex across the street. At 12:00 PM, winter shadows from the Project would be cast in a northerly direction across Pico Boulevard. At 3:00 PM, winter shadows from the Project would be cast in a northeasterly direction. These shadows would shade the commercial buildings to the northeast of the Project Site. As shown in Figure III-2, a portion of the adjacent building to the north would be shaded for three hours. However, there are no shadow-sensitive uses in the

portion of the adjacent buildings that would be shaded for three hours. Consequently, winter shadow impacts from the Project would be less than significant.

“Equinox” is either of two points of intersection of the sun’s apparent annual path and the plane of the earth’s equator, that is, a point of intersection of the elliptic and the celestial equator. At the equinoxes, day and night are the same duration as the sun’s transit falls on the equator. Shadows cast on the equinoxes are intermediary between the solstices. As shown in Figure III-3 (Equinox Shadows), the Project would cast shadows to the northwest through the north during the Spring and Fall Equinox.

At 9:00 AM, Equinox shadows from the Project would be cast in a northwesterly direction. These shadows would shade Pico Boulevard. At 12:00 PM, Equinox shadows from the Project would be cast in a northern direction. These shadows would also shade Pico Boulevard. At 4:00 PM, Equinox shadows from the Project would be cast in a northeasterly direction. These shadows would shade most of the building located directly northeast of the Project Site. However, there are no shadow-sensitive uses in the portions of shaded building. Consequently, Equinox shadow impacts from the Project would be less than significant.

d) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

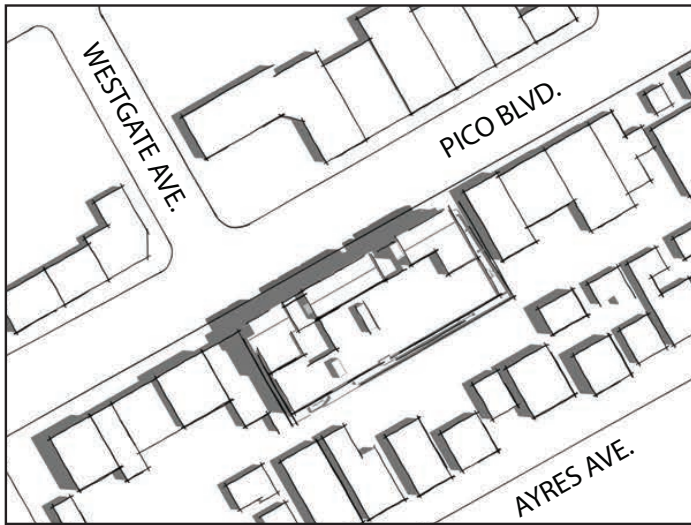
Potentially Significant Unless Mitigation Incorporated. For the purpose of this Initial Study, a significant impact may occur if a project introduces new sources of light or glare on or from the Project Site which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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.

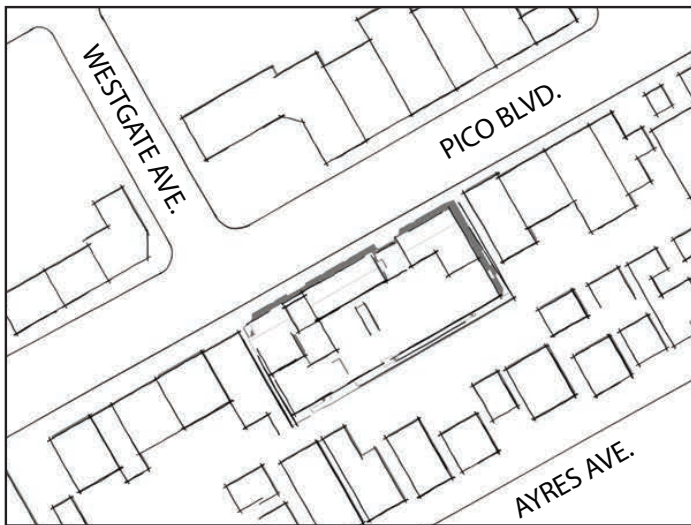
Light

The Project Site is located in a well-lit urban area where there are high levels of ambient nighttime lighting including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows) and automobile headlights.

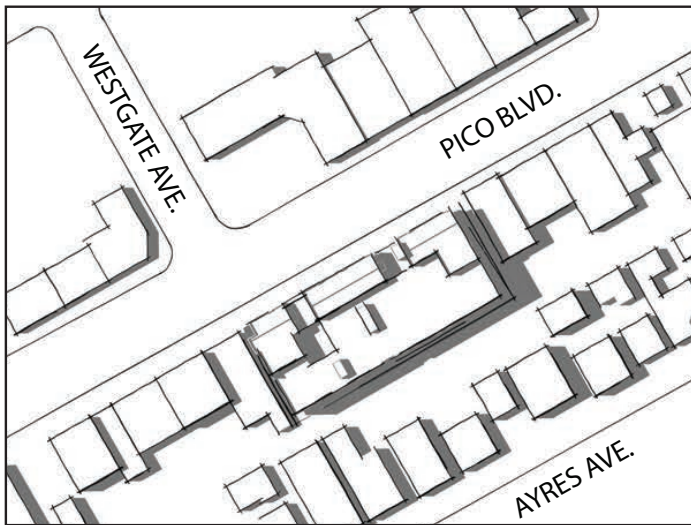
Artificial light impacts are largely a function of proximity. The Project Site is located within an urban environment, so that light emanating from any one source contributes to rather than is solely responsible for lighting impacts on a particular use. Since development surrounding the Project Site is already impacted by lighting from existing development within the area, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any notable effect.



June 21 - 9:00 AM

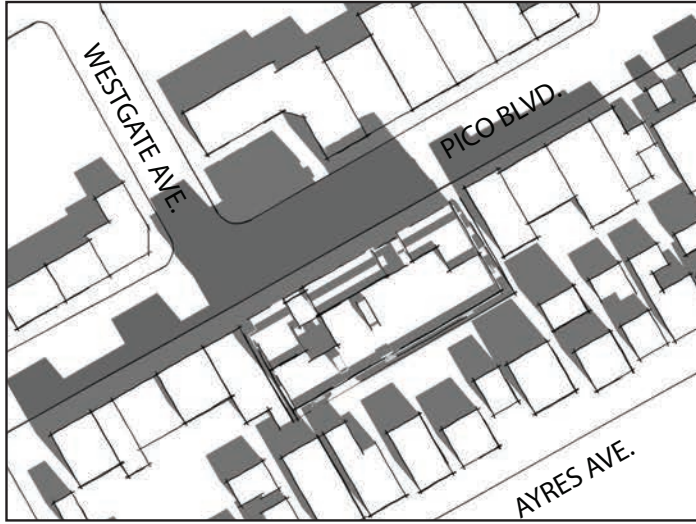


June 21 - NOON

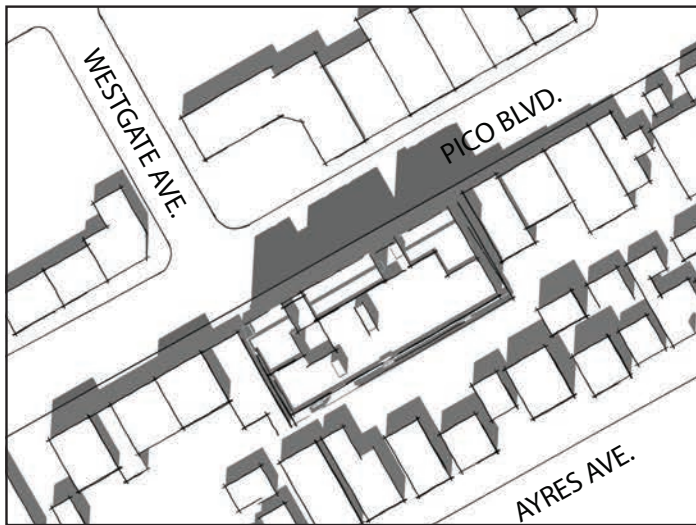


June 21 - 3:00 PM

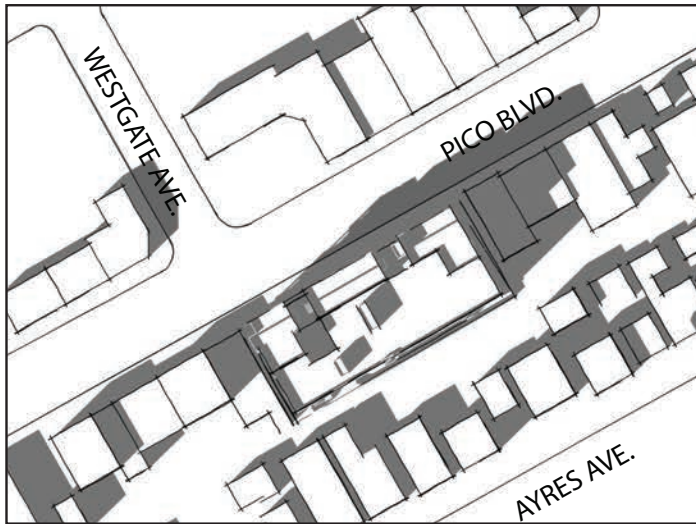
Source: KFA, May 2015.



Dec 21 - 9:00 AM

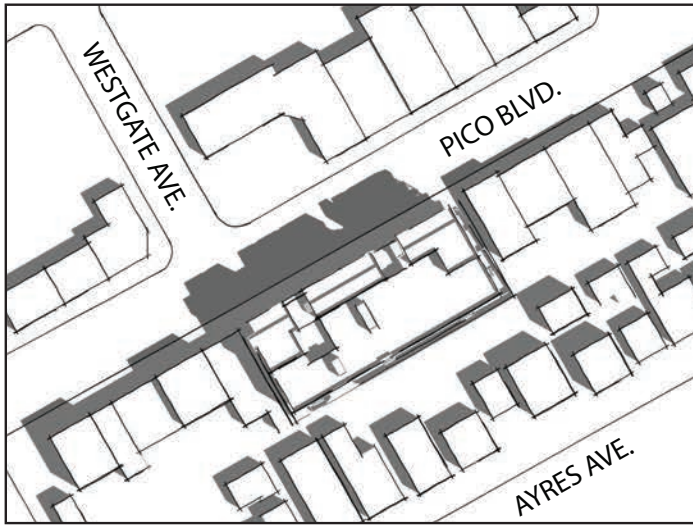


Dec 21 - NOON

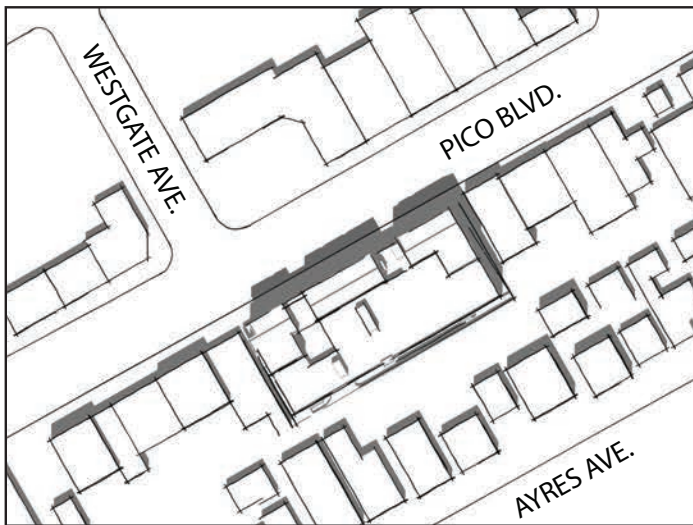


Dec 21 - 3:00 PM

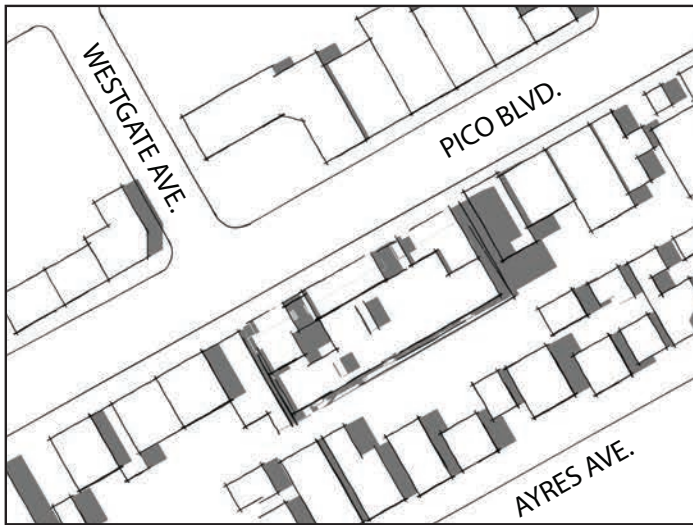
Source: KFA, May 2015.



March 20 - 9:00 AM



March 20 - NOON



March 20 - 3:00 PM

Source: KFA, May 2015.

The Project would have the potential to alter lighting patterns in the area of the Project Site as compared with the existing one- to- two-story buildings and the surface parking lot. Although the amount of light emanating from the Project would represent an increase over current light levels, 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 3/4 foot-candle of flood lighting measured at the pavement.

In addition, headlight from vehicles entering and exiting the Project parking area at night would be a new source of light at the Project Site. The Project includes a design feature to reduce the light emanating from vehicle headlights; this design feature is a decorative fence that would be covered with vines and plants. The intent of this landscaped fence is to shield the vehicle headlight from the adjacent residences. In addition, the implementation of Mitigation Measure 1-120 would ensure that any new light sources would not create significant lighting impacts on nearby residences. Therefore, impacts associated with illumination would be less than significant with the implementation of the identified mitigation measure.

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 highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site and exterior building windows. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area.

The exterior portions of the proposed building would utilize various non-reflective material designed to minimize the transmission of glare from buildings. Implementation of Mitigation Measures I-130 would ensure the inclusion of appropriate materials on the exterior of the building. The proposed building would incorporate exterior landscaping, as necessary, to reduce potential glare generated by windows and glass panels. As such, impacts associated with glare would be less than significant.

Mitigation Measure

I-120 Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

- I-130** The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with any potential additional projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Development of any additional projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, similar to the Project, any additional projects would be required to submit a landscape plan and signage plan (if proposed) to the Los Angeles Department of City Planning for review and approval prior to the issuance of grading permits. Any approvals granted to related projects are expected to allow landscape and signage that would be aesthetically compatible with the surrounding neighborhood. Therefore, cumulative aesthetic impacts would be less than significant and no mitigation measures would be required.

2. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use.

The Project Site has been previously completely developed and is located in a heavily urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on or in the vicinity of the Project Site. The Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.⁴ According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact would occur and no mitigation measures would be required.

⁴ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/fmmp/>, accessed January 22, 2015.*

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned [Q]C2-1VL-CDO and has a land use designation of General Commercial in the Palms-Mar Vista-Del Rey Community Plan. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.⁵ Therefore, no impact would occur and no mitigation measures would be 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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)).

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned [Q]C2-1VL-CDO and has a land use designation of General Commercial in the Palms-Mar Vista-Del Rey Community Plan. The Project Site is not zoned as forest land or timberland, and there is no Timberland Production at the Project Site. Therefore, no impact would occur and no mitigation measures would be required.

⁵ *Williamson Act Program, California Division of Land Resource Protection, website: <http://ftp.consrv.ca.gov/pub/dlrp/fmmp/>, accessed January 22, 2015.*

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use.

The Project Site has been previously completely developed and is located in a heavily urbanized area of the City of Los Angeles. No forest land exists on or in the vicinity of the Project Site. Therefore, no impact would occur and no mitigation measures would be 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project results in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

The Project Site, which has been previously completely developed, contains surface parking and buildings and is located in a heavily urbanized area of the City of Los Angeles. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section 2(a)), the Project Site is not classified in any "Farmland" category designated by the State of California. According to the City General Plan Conservation Element Exhibit B, the Project Site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). Therefore, no impact would occur and no mitigation measures would be required.

Cumulative Impacts

No Impact. The Project would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.⁶ The Project Site is located in an urbanized area in the City and do not include any State-designated agricultural lands or forest uses. Therefore, the Project would not contribute to a cumulative impact, and no impact would occur.

⁶ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Farmland Mapping and Monitoring Program, Important Farmland in California, 2006, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_wallsize.pdf, accessed January 22, 2015.*

3. AIR QUALITY

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 its most current version of 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 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 comparing the population generated by the Project to the population projections used in the development of the AQMP. Projects that are consistent with SCAG's applicable growth projections would not interfere with air quality attainment because this growth 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. 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 Project involves the demolition of the existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family use and the construction of a five-story, 56-foot tall building, which would include a total of 100 dwelling units on the upper levels, 2,871 square feet of restaurant uses on the ground floor, 129 parking spaces located within the lower levels, and 200 bicycle parking spaces. As discussed in Question 13(a) herein, the Project would be consistent with the regional growth projections for the Los Angeles Subregion. In addition and further discussed herein, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Thus, the Project would not impair implementation of the AQMP, and this impact would be less than significant and no mitigation measures would be required.

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 III-1 (SCAQMD Thresholds of Significance), be considered significant. The City of Los Angeles defers to these thresholds for the evaluation of construction and operational air quality impacts.

**Table III-1
SCAQMD Regional 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
Respirable Particulate Matter (PM ₁₀)	150	150
Fine Particulate Matter (PM _{2.5})	55	55
<i>Note: lbs = pounds. Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2; Revised March 2015, accessed April 7, 2015.</i>		

Regional Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 18 months. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition of existing uses, 2) grading/site preparation/excavation, and (3) building construction.

Demolition would occur for approximately one month and would require the demolition and removal of approximately 1,400 tons of demolition debris. This analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one rubber tired dozer, and two tractors/loaders/backhoes.

Grading, site preparation and excavation would occur for approximately two months and would require the export of approximately 26,000 cubic yards (cy) of soil.⁷ This analysis assumes daily grading, site preparation, and excavation activities would require the following equipment: one grader, one excavator, and two tractors/loaders/backhoes.

Building construction would occur for approximately 14 months and would include the construction of the proposed structure, connection of utilities, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, two forklifts, one generator set, two tractors/loaders/backhoes, one welder, one air compressor, one piece of paving equipment, and one roller.

These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod 2013.2.2) recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table III-2 (Estimated Peak Daily Construction Emissions) identifies daily emissions that are estimated to occur on peak construction days for each construction phase. These calculations assume that appropriate dust control measures would be implemented as part of the Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over

⁷ *Project Site is approximately 0.63 acres or 27,422 square feet and would require 2.5 levels of subterranean parking. At a depth of approximately 10 feet per level, this equates to approximately 26,000 cubic yards of soil export required.*

exposed areas. To ensure compliance with these applicable rules, the following regulatory compliance measure is recommended.:

**Table III-2
Estimated Peak Daily Construction Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition Phase						
Fugitive Dust	--	--	--	--	0.56	0.08
Off-Road Diesel Equipment	2.40	23.38	17.88	0.02	1.37	1.29
On-Road Diesel (Hauling)	0.12	1.91	1.52	0.01	0.14	0.06
Worker Trips	0.05	0.06	0.65	0.01	0.11	0.03
Total Emissions	2.57	25.35	20.05	0.04	2.18	1.46
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Grading/Site Preparation/Excavation Phase						
Fugitive Dust	--	--	--	--	0.33	0.17
Off-Road Diesel Equipment	2.41	22.78	15.71	0.03	1.42	1.34
On-Road Diesel (Hauling)	1.38	21.43	17.03	0.06	1.59	0.63
Worker Trips	0.05	0.06	0.65	0.01	0.11	0.03
Total Emissions	3.84	44.27	33.39	0.10	3.45	2.17
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	2.09	18.77	12.26	0.02	1.30	1.22
Building Construction Vendor Trips	0.19	1.79	2.48	0.01	0.15	0.06
Building Construction Worker Trips	0.44	0.60	6.25	0.01	1.08	0.29
Architectural Coatings	31.75	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.33	2.19	1.87	0.01	0.17	0.15
Architectural Coatings Worker Trips	0.08	0.11	1.12	0.01	0.21	0.06
Paving Off-Road Diesel Equipment	1.32	12.99	9.73	0.02	0.76	0.70
Paving Worker Trips	0.02	0.03	0.29	0.01	0.06	0.02
Total Emissions	36.22	36.48	34.00	0.09	3.73	2.50
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Calculation sheets are provided in Appendix C to this Draft IS/MND.</i>						

Regulatory Compliance Measure

RC 3-1 All unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions

and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 61 percent.

As shown in Table III-2 (Estimated Peak Daily Construction Emissions), construction-related daily emissions associated with the Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, regional construction impacts would be less than significant.

Regional Operational Emissions

Existing Conditions

The Project Site is comprised of an existing surface parking lot, three one-story commercial structures, and a two-story four-unit multi-family use. As such, air pollutant emissions are currently generated at the Project Site by area sources, energy demand, and mobile sources such as motor vehicle traffic traveling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing CalEEMod 2013.2.2 recommended by the SCAQMD. As shown in Table III-3 (Existing Daily Operational Emissions at Project Site), motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site

**Table III-3
Existing Daily Operational Emissions at Project Site**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Area Sources	0.56	<0.01	0.01	0.00	<0.01	<0.01
Energy Demand	<0.01	0.04	0.04	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	2.29	4.76	20.76	0.04	2.55	0.73
Total Existing Emissions	2.85	4.80	20.81	0.04	2.55	0.73
Wintertime (Non-Smog Season) Emissions						
Area Sources	0.56	<0.01	0.01	0.00	<0.01	<0.01
Energy Demand	<0.01	0.04	0.04	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	2.44	5.00	21.59	0.04	2.55	0.73
Total Existing Emissions	3.00	5.05	21.64	0.04	2.55	0.73
<i>Calculation data provided in Appendix C to this IS/MND. Column totals may not add due to rounding from the model results.</i>						

Project

The Project includes the operation of a five-story building which would include a total of 100 dwelling units on the upper levels, 2,871 square feet of restaurant uses on the ground floor, and 129 parking spaces located within the lower levels. As such, air pollutant emissions would be generated at the Project Site by area sources, energy demand, and mobile sources such as motor vehicle traffic traveling to and from the Project Site. The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod 2013.2.2 recommended by the SCAQMD. The results of these calculations are presented in Table III-4 (Estimated Daily Operational Emissions). As shown, the

operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Project would be less than significant and no mitigation measures are required.

**Table III-4
Estimated 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	4.15	0.10	8.36	<0.01	0.17	0.16
Energy Demand	0.04	0.35	0.22	<0.01	0.03	0.03
Mobile (Motor Vehicles)	2.86	7.52	30.94	0.08	5.03	1.42
Total Project Emissions	7.05	7.97	39.52	0.08	5.23	1.61
Less Existing Site Emissions	2.85	4.80	20.81	0.04	2.55	0.73
Net Increase Project Emissions	4.20	3.17	18.71	0.04	2.68	0.88
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	4.15	0.10	8.36	<0.01	0.17	0.16
Energy Demand	0.04	0.35	0.22	<0.01	0.03	0.03
Mobile (Motor Vehicles)	3.01	7.92	31.33	0.07	5.03	1.42
Total Project Emissions	7.20	8.37	39.91	0.07	5.23	1.61
Less Existing Site Emissions	3.00	5.05	21.64	0.04	2.55	0.73
Net Increase Project Emissions	4.20	3.32	18.27	0.03	2.68	0.88
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
<i>Calculation data provided in Appendix C to this IS/MND. Column totals may not add due to rounding from the model results.</i>						

- 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 (NO₂), PM₁₀ and PM_{2.5}, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the proposed 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 construction and operational emissions generated by the Project would not exceed any of thresholds of significance recommended by the SCAQMD. Also, as discussed below, 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 which the Basin is in nonattainment. Thus, cumulative air quality impacts associated with the Project would be less than significant and no mitigation measures would be required.

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 air quality sensitive receptors to the Project Site are residential uses approximately 25 feet to the southeast across the alley, and a daycare use approximately 100 feet northeast across Pico Boulevard.

Localized Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. 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) and various distances from the source of emissions. In the case of this analysis, the Project Site is located within SRA 2 covering Northwest Coastal Los Angeles County. The nearest sensitive receptors to the Project Site are the residential uses approximately 25 feet to the southeast across the alley, and a daycare use approximately 100 feet northeast across Pico Boulevard. 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. The Project Site is less than one acre in size (0.63 acres). As such and consistent with SCAQMD

recommendations, the localized thresholds for a one-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 2 have been used to address the potential localized NO_x, CO, PM₁₀, and PM_{2.5} impacts to the area surrounding the Project Site.

As shown in Table III-5 (Localized On-Site Peak Daily Construction Emissions), peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for a one-acre site in SRA 2. Therefore, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant and no mitigation measures would be required.

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) from A-C to any level below C, and for any intersection rated D or worse where the Project would increase the V/C ratio by two percent or more. As stated the Project's trip generation assessment, a net decrease of 6 trips would occur in the morning peak hour and a net decrease of 31 trips would occur in the afternoon peak hour when compared to the existing uses at the Project Site. As such, the Project would not meet these criteria at any of the studied intersections. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Therefore, impacts with respect to localized CO concentrations would be less than significant and no mitigation measures would be required.

Toxic Air Contaminants (TAC)

As the Project consists of apartments and restaurant uses, the Project would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants and no toxic airborne emissions would typically result from project implementation. In addition, construction activities associated with the Project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant and no mitigation measures would be required.

**Table III-5
Localized On-Site Peak Daily Construction Emissions**

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO _x ^b	CO	PM ₁₀	PM _{2.5}
Demolition Emissions	23.38	17.88	1.93	1.37
<i>SCAQMD Localized Thresholds</i>	<i>103.00</i>	<i>562.00</i>	<i>4.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
Grading, Site Preparation & Foundation Emissions	22.78	15.71	1.75	1.51
<i>SCAQMD Localized Thresholds</i>	<i>103.00</i>	<i>562.00</i>	<i>4.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	33.95	23.86	2.23	2.07
<i>SCAQMD Localized Thresholds</i>	<i>103.00</i>	<i>562.00</i>	<i>4.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include paving and architectural coatings.

^a *The Project Site is less than one acre in size (0.63 acres). As such and consistent with SCAQMD recommendations, the localized thresholds for all phases are based on a one-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 2.*

^b *The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO₂, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels as they are associated with adverse health effects.*

Calculation sheets are provided in Appendix C to this Draft IS/MND.

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 Project would result in generation of odors that would be perceptible in adjacent sensitive areas. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of apartment and restaurant uses, which are not typically associated with odor complaints. As the Project involves no elements related to industrial projects, no objectionable odors are anticipated. Therefore, the potential impacts associated with objectionable odors would be less than significant and no mitigation measures would be required.

Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project. The Project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Therefore, construction of the Project would result in less-than-significant impacts related to odors and no mitigation measures would be required.

Cumulative Impacts

Less than Significant Impact. Because the Basin is currently in nonattainment for ozone, NO₂, PM₁₀, and PM_{2.5}, other projects in the 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 and localized construction 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. Thus, cumulative air quality impacts would be less than significant and no mitigation measures are required.

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 Game or U.S. Fish and Wildlife Service?**

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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, which has been previously completely developed, contains a surface parking lot, commercial buildings, and a vacant multi-family use and is located in a heavily urbanized area of the City of Los Angeles. There are no protected trees as defined by the City of Los Angeles Protected Tree Ordinance No. 177,404 (i.e., native oaks [*Quercus sp.*], western sycamore [*Platanus racemosa*], Southern California black walnut [*Juglans californica*] and California bay [*Umbellularia californica*]) on the Project Site.

More specifically, the Project Site, itself, does not contain any vegetation. However, there are five street trees along Pico Boulevard that are young and relatively small. The five street trees are in the parkway/sidewalk that is part of the City of Los Angeles public right-of-way, under the jurisdiction of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Therefore, 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 Game or U.S. Fish and Wildlife Service. In addition, there are no known locally designated natural communities at the Project Site or in the Project vicinity. Therefore, the Project would have no impact on sensitive biological species or habitat and no mitigation measures would be 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 Game or U.S. Fish and Wildlife Service?

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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.

The Project Site, which has been previously completely developed, contains a surface parking lot and several buildings and is located in a heavily urbanized area of the City of Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.⁸ Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities and no mitigation measures would be required.

⁸ *Environmental and Public Facilities Maps: Significant Ecological Areas, Los Angeles City Planning Department, September 1, 1996.*

- 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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, which has been previously completely developed, contains a surface parking lot and several buildings and is located in a heavily urbanized area of the City of Los Angeles. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site.⁹ Further, as it is fully developed, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 4(b), above). Therefore, no impacts to riparian or wetland habitats would occur with implementation of the Project and no mitigation measures would be 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?**

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on biological resources if it could result in:

- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

As discussed in Section 4(a), the Project Site is located in an area that has been previously developed in a heavily urbanized area of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the vicinity of the Project Site. Therefore, implementation of the Project would have no impact on the movement of any resident or migratory fish or wildlife species and no mitigation measures would be required.

- 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project-related significant adverse effect could occur

⁹ *National Wetlands Inventory, U.S. Fish & Wildlife Service, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed January 22, 2015.*

if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404.

As discussed above in 4 (a), there are no protected trees as defined by the City of Los Angeles Protected Tree Ordinance No. 177,404 (i.e., native oaks [*Quercus sp.*], western sycamore [*Platanus racemosa*], Southern California black walnut [*Juglans californica*] and California bay [*Umbellularia californica*]) on the Project Site. More specifically, the Project Site, itself, does not contain any vegetation. However, there are five street trees along Pico Boulevard that are young and relatively small. The five street trees are in the parkway/sidewalk that is part of the City of Los Angeles public right-of-way, under the jurisdiction of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. These non-native trees could be removed during construction of the Project. Therefore, the following mitigation measure is recommended to reduce this impact to a less-than-significant level.

Mitigation Measures

IV-90 Removal of trees in the public right-of-way requires approval by the Board of Public Works.

The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).

The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.

Trees shall be planted in the adjacent public right-of-way at a ratio of one tree for every thirty (30) feet of lot frontage or to the satisfaction of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 with implementation of the Project and no mitigation measures would be required.

Cumulative Impacts

Less Than Significant Impact. With the implementation of the recommended mitigation measures, the Project would not result in a significant impact to biological resources. The Project Site is located in an urbanized area in the City and does not contain any protected biological resources. Therefore, the Project would not contribute to a cumulative impact, and a less-than-significant impact would occur.

5. CULTURAL RESOURCES

a) **Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 adverse effect 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.

There are no known historic resources on the Project Site and none adjacent to the Project Site that would be affected by the Project. There are two buildings on the Project Site, which are identified as being at least 50 years old by the County of Los Angeles County Tax Assessor Records. These buildings include the two-story multi-family use located at 11904 West Pico Boulevard, which was constructed in 1955, and the commercial building located at 11918 West Pico Boulevard, which was constructed in 1925. These buildings, therefore meet the minimum fifty-year age requirement for consideration as a landmark at the national or state levels. However, due to their design, use, and altered condition, the buildings do not appear to be eligible for landmark designation at the national, state, or local levels. Additionally, none of the on-site buildings meet the criteria for designation under the California Register

of Historical Resources nor are they identified in Survey LA, the Los Angeles Historic Resources Survey, or listed on the Historic Places LA website.^{10,11}

A review was completed of inventories to identify potential historic resources in the Project area. Survey LA, the Los Angeles Historic Resources Survey for the Palms-Mar Vista-Del Rey Community Plan Area was consulted to identify potential historic resources in the Project area. Survey LA identifies historic resources throughout Los Angeles. No potential or listed historic resources were identified adjacent to the Project Site.

There is no potential for the Project to impact any historic resources or potential historic resources. Most are in the general vicinity, but not directly adjacent to the Project Site. The nearest potential historic resources are:

- 11708 Pico Boulevard is listed in the Cultural and Historic Resources Information System (CHRIS) as a “3S”, “3C5”, and “5S3”, indicating the property is individually eligible for local listing. However, the subject potential historic resource is located one block east of the Project Site on Pico Boulevard, and is not considered in the immediate vicinity of the Project Site.
- 12244 West Pico Boulevard is listed in the CHRIS as a “3S”, “3C5”, and “5S3”, indicating the property is individually eligible for local listing. However, the subject potential historic resource is located two blocks west of the Project Site on Pico Boulevard, and is not considered in the immediate vicinity of the Project Site.

These historic resources are not a part of the Project and would not be demolished, altered, or moved as a result of implementation the Project. Therefore, impacts with respect to historical resources would be less than significant 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. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources which presently exist within the Project Site.

Based on a review of City of Los Angeles Environmental Hazard Maps, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.¹² In

¹⁰ Survey LA, website: <http://preservation.lacity.org/survey>, accessed March 17, 2015.

¹¹ Historic Places LA, website: <http://www.historicplacesla.org/index.htm>, accessed March 17, 2015.

¹² City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles*, September 1996.

addition, the Project is located in a highly urbanized area of the City of Los Angeles and has been subject to past disturbance, including the construction of previous uses on the Project Site. However, 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 will be required to follow procedures detailed in California Public Resources Code Section 21083.2. Therefore, the impact on archaeological resources would be less than significant.

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 geologic features which presently exist within the Project Site.

No unique geologic features are located on the Project Site, which contains vacant lots and vacant buildings. Based on a review of City of Los Angeles Environmental Hazard Maps, the Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.¹³ While the uncovering of notable resources is not anticipated, to be conservative, the following mitigation measure is proposed. The Project would require additional ground disturbance that may involve excavation into native soils that contain paleontological resources. If previously unknown paleontological resources are found during excavation, the Project will be required to follow procedures as detailed in the California Public Resources Code Sections 5097.5 and 30244. Therefore, the impact on paleontological resources would be less than significant.

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

Less Than Significant Impact. A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project Site is developed with a building and a surface parking area. 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 or sites are known to occur within the Project 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, compliance with State laws, which fall within the jurisdiction of

¹³ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

the Native American Heritage Commission (Public Resources Code Section 5097), relating to the disposition of Native American burials would be adhered to. Therefore, the impact on human remains would be less than significant.

Cumulative Impacts

Less Than Significant Impact. With the implementation of the recommended mitigation measures, the Project would not result in a significant impact to cultural resources. The Project Site is located in an urbanized area in the City and does not contain any known cultural resources. Therefore, the Project would not contribute to a cumulative impact, and a less-than-significant impact would occur and no mitigation measures are required.

6. GEOLOGY AND SOILS

The following section summarizes the information provided in the Geotechnical Investigation for the Proposed Five-Story Mixed-Use Building over Two to Three Subterranean Parking Levels, Lots 18-27, Tract 7861, 11900-11936 West Pico Boulevard, Los Angeles, California, prepared by Byer Geotechnical, Inc., dated February 4, 2015 (Geotechnical Report). The Geotechnical Report is provided as Appendix E to this Initial Study.

- 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.**

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project Site is located within a State-designated Alquist-Priolo Zone or other designated fault zone.

The Project Site is located in the seismically active region of southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. However, no known active faults cross the Project Site, and the site is not located within a currently-designated Alquist-Priolo Earthquake Fault Zone. The distance to the nearest active fault to the site, the Santa Monica Fault, is approximately 0.50 mile (0.81 kilometer). The potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low. Impacts would be less than significant and no mitigation measures would be required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Because the Los Angeles region is generally considered to be geologically active, most Projects would be exposed to some risk from geologic hazards, such as earthquakes. Thus, in order to be considered a significant geologic impact under the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the Project must exceed the typical risk of hazard for the region. Therefore, 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 other locations in Southern California.

The property is subject to strong seismic shaking from regional conditions. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement. Project construction would be consistent with all applicable provisions of the City of Los Angeles Building Code, California Seismic Standards, and the recommendations of the Geotechnical Study. Conformance with current Building Code requirements would minimize the potential for the structure on the Project Site to sustain damage during an earthquake. The Project would, thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury. Furthermore, although the Project Site is located within approximately 0.50 mile of the Santa Monica Fault, and nearby many other faults on a regional level, the potential seismic hazard to the Project Site would not be higher than in most areas of the City of Los Angeles or elsewhere in the region. Therefore, risks from seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a Project Site is located within a liquefaction zone.

Liquefaction involves sudden loss in strength of a saturated, cohesionless soil (predominantly sand) caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in pore water pressure can temporarily transform the soil into a fluid mass, resulting in vertical settlement and can also cause lateral ground deformations. Typically, liquefaction occurs in areas where there are loose sands and the depth to groundwater is less than 50 feet from the surface. Seismic shaking can also cause soil compaction and ground settlement without liquefaction occurring, including settlement of dry sands above the water table.

The United States Geological Survey, California Geological Survey (CGS), has mapped the Project Site within an area where historic occurrence of liquefaction and groundwater conditions indicate a potential for permanent ground displacement. Groundwater was encountered during an 80-foot exploratory boring excavation at a depth of 40.5 feet below the existing ground surface. The results of the calculations indicate that during a design level earthquake along a nearby fault, earth materials

underlying the Project Site are not susceptible to liquefaction. However, additional exploratory borings indicated that there is a five-foot-thick soil layer at an approximate depth of 50 feet that may be susceptible to liquefaction. Further, it should be noted that variations in subsurface water (including perched water zones and seepage) may result from fluctuations in the ground surface topography, subsurface stratification, precipitation, irrigation and other factors that may not have been evident at the time of the subsurface exploration. To ensure that geology and soil impacts regarding soil stability and expansive soils as a result of construction of the proposed building are reduced to the maximum extent practicable, implementation of all site-specific requirements identified in the Geotechnical Study (see Appendix E to this Draft Initial Study) shall be required.

iv. Landslides?

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 project-related significant adverse effect 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 and surrounding vicinity are flat and are not located within an area identified as having potential for landslides.¹⁴ In addition, according to the Safety Element,¹⁵ the Project Site is not located within an area identified as having potential for landslides. Further, the Project Site is in a densely developed area of the City and there are no known nearby landslides, nor is the Project Site in the path of any known or potential landslides. As the probability of landslides, including seismically induced landslides, is very low at the Project Site, no impact would occur and no mitigation measures are required.

b) Result in substantial soil erosion or the loss of topsoil?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have significant sedimentation or erosion impact if it would:

¹⁴ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, website: <http://zimas.lacity.org/>, accessed: February 25, 2015.

¹⁵ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Safety Element Exhibit C: Landslide Inventory and Hillside Areas in the City of Los Angeles, May 1995*, website: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed: September 4, 2014.

- Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or
- Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in a Stormwater Pollution Prevention Program (SWPPP), which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the structure and paving, while the remaining portions of the Project Site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project.

Construction of the proposed buildings could result in substantial soil erosion or the loss of topsoil. Implementation of Mitigation Measures VI-20 would reduce the impact to a less than significant level.

Mitigation Measure

- VI-20** The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:

- a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
- b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.
- c. A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.
- d. "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil

- from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.
- e. "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.
 - f. Movement and removal of approved fencing shall not occur without prior approval by LADBS.
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Less Than Significant. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 built in an unstable area without proper site preparation or design features to provide adequate foundations for Project buildings, thus posing a hazard to life and property.

Potential impacts with respect to liquefaction and landslide potential are evaluated in Checklist Questions 6 (a)(iii) and 6 (a)(iv), above.

Lateral spreading, a common result of cyclic mobility, can occur on gently sloping and on flat ground close to rivers and lakes. These conditions do not exist within the Project Site, given the relatively level topography of the site and the lack of channel free faces in the general vicinity of the site.

As described in the Geotechnical Study, the existing fill materials that underlie the Project Site are considered to be unsuitable for support of proposed foundations, floor slabs, or additional fill. The Project would be constructed over a three-level subterranean parking structure and excavation is expected to be approximately 32 feet below existing grade. It is anticipated that the proposed subterranean levels would remove the existing fill materials and expose the underlying dense native soils. The Geotechnical Study recommended that the proposed structure be supported on foundations bearing in the underlying dense native soils. The report further recommends the bearing material is alluvium for the east portion of the building and marine deposits for the west portion of the building. Conventional foundations may be used. In accordance with the recommendations of the Geotechnical Study, the Project would not cause or accelerate geologic hazards related to unstable soils that would become unstable as a result of the Project and potentially cause collapse. Therefore, impacts associated with unstable soils would be less than significant. Furthermore, all construction would comply with the City of Los Angeles Building Code, which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. Therefore, potential impacts due to landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

d) 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. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 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 Project Site was found to be underlain by natural alluvial fan deposits of 31 to 40 feet below existing grade. The upper 12 to 18 feet of alluvium consists of sandy clay that is brown to dark brown, slightly moist, and medium stiff to very stiff. Based on the configuration of the Project, alluvium would be encountered at the bottom of excavation for the eastern portion of the Project Site.

Marine deposits underlie the Project Site, at a depth, below the alluvium. The upper 34 feet of marine deposits consist of gravelly sand that is dark greenish-brown, dry to slightly moist, becoming very moist to wet below groundwater, and dense to very dense. The marine deposits below the depth of 65 feet consist of silty sand, clay, and sandy clay that are greenish-brown to dark brown, moist, dense to very dense, and hard. Based on the current configuration of the Project, marine deposits would be encountered at the bottom of excavation for the western portion of the Project Site.

Construction of the Project would be required to comply with the City of Los Angeles UBC and the California Building Code, which include building foundation requirements appropriate to site-specific conditions. With compliance with existing regulations, implementation of all site-specific requirements identified in the Geotechnical Study (see Appendix E to this Draft Initial Study), impacts associated with soils would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. The existing uses are connected to the City's sewer system and no septic tanks or alternative disposal systems neither are necessary, nor are they proposed. No impact would occur.

Cumulative Impacts

Less Than Significant Impact. 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. However, with adherence to applicable local, State, and federal regulations, building codes, and sound engineering practices, geologic hazards would be less than significant. Furthermore, the analysis of the Project's geology and soils impacts concluded that, with the implementation of the recommended mitigation measures, impacts would be less than significant. Therefore, cumulative impacts would be less than significant and no mitigation measures are required.

7. GREENHOUSE GAS EMISSIONS

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

Potentially Significant Unless Mitigation Incorporated. Gases that trap heat in the atmosphere are called greenhouse gases ("GHG"), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, would have the potential to generate greenhouse gas emissions.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ 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 CO₂ equivalents (CO₂e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Regulatory Environment

State

Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020.

The CARB AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by CARB with input from the Climate Action Team (CAT) and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

CARB has adopted the First Update to the Climate Change Scoping Plan.¹⁶ This update identifies the next steps for California's leadership on climate change. The first update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the State as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020.

In the original Scoping Plan, CARB approved a total statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons of CO₂e. As part of the update, CARB revised the 2020 Statewide limit to 431 million metric tons of CO₂e, an approximately 1 percent increase from the original estimate. The 2020 business-as-usual (BAU) forecast in the update is 509 million metric tons of CO₂e. The State would need to reduce those emissions by 15 percent to meet the 431 million metric tons of CO₂e 2020 limit.

¹⁶ CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014*.

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

On April 2, 2011, Governor Jerry Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

California Green Building Standards (CALGreen) Code

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 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) were revised and adopted in part to respond 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 California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11).

Local Policies and Regulations

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

In 2010, the City adopted the 2010 California Green Building Standards Code, also known as CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new Los Angeles Green Building Code. As stated in Section 99.01.101.1 of the LAMC, these regulations shall be known as the Los Angeles Green Building Code and may be cited as such. The Los Angeles Green Building Code is Article 9 of a total of 9 Articles of Chapter IX of the LAMC, and adopts by reference the CALGreen Code except as amended therein. The provisions of this code shall apply to the construction of every new building, every building alteration with a building permit valuation of \$200,000 or more, and every building addition, unless otherwise indicated in this code, throughout the City. The Los Angeles Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The Los Angeles Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards. In addition, the Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in AB 32, described above.

GHG Significance Threshold

The L.A. CEQA Thresholds Guide does not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a commercial project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines and a draft screening threshold previously considered by the SCAQMD.

As required in Section 15604.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

In December 2008, the SCAQMD adopted an interim 10,000 metric tons CO₂e (MTCO₂e) per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The SCAQMD continues to consider adoption of significance thresholds for non-industrial 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 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.

Tier 3: Consider whether the Project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MTCO₂e/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 MTCO₂e/year), commercial projects (1,400 MTCO₂e/year), and mixed-use projects (3,000 MTCO₂e/year). Under option 2 a single numerical screening threshold of 3,000 MTCO₂e/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 MTCO₂e per service population for Project level analyses and 6.6 MTCO₂e 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.

For the purpose of evaluating the GHG impacts associated with the Project, this analysis utilizes the proposed 3,000 MTCO₂e per year Tier 3 threshold for non-industrial projects. These draft thresholds have been utilized for other projects in the South Coast Air Basin.

Construction GHG Emissions

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as Project-generated. As explained by California Air Pollution Controls Officers Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines* §15145). Therefore, the construction analysis does not consider such GHG emissions, but does consider non-speculative on-site construction activities and off-site hauling and construction worker trips. All GHG emissions are reported on an annual basis.

Emissions of GHGs were calculated using CalEEMod 2013.2.2 for each year of construction of the Project and the results of this analysis are presented in Table III-6 (Project Construction-Related GHG Emissions). As shown in Table III-6 (Project Construction-Related GHG Emissions), the greatest annual increase in GHG emissions from Project construction activities would be 493.93 metric tons in 2016, and total construction GHG emissions would be 696.27 metric tons.

Table III-6
Project Construction-Related Greenhouse Gas Emissions

Year	CO ₂ e Emissions (Metric Tons per Year)
2016	493.93
2017	202.34
Total Project Construction GHG Emissions	696.27
<i>Calculation data and results are provided in Appendix F of this Draft IS/MND.</i>	

Operational GHG Emissions

Existing Conditions

The Project Site is comprised of an existing surface parking lot, three one-story commercial structures, and a two-story four-unit multi-family use. As such, GHG emissions are currently generated by the use of on-road motor vehicles, energy (electricity and natural gas), water, and generation of solid waste and wastewater. The GHG emissions generated by the existing uses at the Project Site have been estimated utilizing CalEEMod 2013.2.2 recommended by the SCAQMD and are shown in Table III-7 (Existing Greenhouse Gas Emissions). As shown, GHG emissions generated by the Project are approximately 637.42 CO₂e MTY.

**Table III-7
Existing Greenhouse Gas Emissions**

Emissions Source	Estimated Project CO₂e Emissions (Metric Tons per Year)
Energy (Electricity & Natural Gas)	106.77
Mobile (Motor Vehicles)	494.71
Solid Waste Generation	22.58
Water Demand	13.35
Existing Project Site Total	637.42
<i>Calculation data and results provided in Appendix F to this Draft IS/MND.</i>	

Project

The Project includes the operation of a five-story building which would include a total of 100 dwelling units on the upper levels, 2,871 square feet of restaurant uses on the ground floor, 129 parking spaces located within the lower levels, and 200 bicycle parking spaces. The GHG emissions resulting from operation of the Project, which involves the use of on-road motor vehicles, energy (electricity and natural gas), area sources (hearth and landscaping), water, and generation of solid waste and wastewater, were calculated under the assumption of compliance with the CALGreen Code and LA Green Building Code. As shown in Table III-8 (Project Operational Greenhouse Gas Emissions), the net increase in GHG emissions generated by the Project would be approximately 1,088.72 CO₂e MTY, which would be under the 3,000 MTCO₂e per year threshold for non-industrial projects.

In addition, and separate from the quantitative analysis above, there is substantial evidence to support that the Project is qualitatively consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding Scoping Plan. As discussed previously, the City adopted the L.A. Green Plan to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of greenhouse gas emissions. In order to further implement the L.A. Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code applicable to new development projects. As it relates to new development, the City adopted the Los Angeles Green Building Code, which incorporates applicable provisions of the CALGreen Code, and in some cases outlines more strict GHG reduction measures available to development projects in the City of Los Angeles. The Los Angeles Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission. The Scoping Plan encourages communities to adopt building codes that go beyond the state code. Accordingly, as the Los Angeles Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development project that can demonstrate it complies with the Los Angeles Green Building Code is

considered consistent with statewide GHG-reduction goals and policies, including AB 32, regarding stationary emissions.

**Table III-8
Project Operational Greenhouse Gas Emissions**

Emissions Source	Estimated Project CO₂e Emissions (Metric Tons per Year)
Area Sources	23.47
Energy (Electricity & Natural Gas)	536.75
Mobile (Motor Vehicles)	1,031.81
Solid Waste Generation	36.35
Water Demand	74.55
Construction Emissions ^a	23.21
Project Total	1,726.14
Less Existing Project Site Total	637.42
Total Project Net Increase	1,088.72
^a Consistent with SCAQMD recommendations, the total construction GHG emissions were amortized over 30 years and added to the operation of the Project. Calculation data and results provided in Appendix F to this Draft IS/MND.	

GHG Emissions Associated With Motor Vehicles

Motor vehicle related GHG emissions are regulated at the Federal, State and local levels. As discussed in the CARB Scoping Plan, the transportation sector – largely the cars and trucks that move goods and people – is the largest contributor with 38 percent of the State’s total GHG emissions. Many of the transportation-related reduction measures identified in the Scoping Plan are focused on improving motor vehicle efficiencies through more restrictive statewide laws and regulations. Some of these measures include Pavley I & II Standards for light-duty vehicles, Low Carbon Fuel Standards (LCFS), aerodynamic improvements for heavy-duty vehicles, and medium- and heavy-duty vehicle hybridizations. Together, these measures are estimated to reduce 2020 forecasted emissions by 52.60 MMTCO₂E. These regulatory measures are aimed at improving efficiencies of the motor vehicle fleet mix across the State, and as such, GHG emissions from future motor vehicles accessing the Project would be reduced as a result of these statewide programs.

Conclusion

Through compliance with the CALGreen Code and Los Angeles Green Building Code, the Project would be consistent with local and statewide goals and policies aimed at reducing the generation of stationary GHGs, including CARB’s AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. In addition, the Project’s total construction and operational GHG emissions would not have the potential to exceed the 3,000 metric tons of CO₂e per year screening threshold proposed by the SCAQMD staff.

Therefore, the Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant. Nevertheless, the Department of City Planning recommends the following mitigation measures to further reduce the Project's greenhouse gas emissions.

Mitigation Measures:

VII-10 Green House Gas Emissions

- Only low- and non-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the Project.
- Any new construction shall include 20 percent of parking spaces set aside for EV ready parking.

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 City of Los Angeles CEQA Thresholds Guide, a significant impact would occur if the Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As described in Question 7(a) above, through required implementation of the Los Angeles Green Building Code and consistency with the CALGreen Code, the Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Therefore, the Project's generation of GHG emissions would not make a cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gasses. The incorporation of Mitigation Measure VII-10 would ensure these impacts remain less than significant.

Cumulative Impacts

Less Than Significant Impact. 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 statewide emissions to 1990 levels by 2020, even though statewide population and commerce is expected to grow substantially. The Project would be consistent with all applicable strategies from the 2006 CAT Report and all applicable measures from the ARB Scoping Plan. The implementation of the Project would not result in an unplanned level of development and does not represent a substantial new source of GHG emissions. For these reasons, the cumulative impact would be less than significant and no mitigation measures are required.

8. HAZARDS AND HAZARDOUS MATERIALS

The following section summarizes the information provided in the Phase I Environmental Site Assessment Pico Boulevard, 11900-11936 West Pico Boulevard, Los Angeles, California, 90064, prepared by Partner Engineering and Science, Inc., September 16, 2014. This report is provided as Appendix G to this Initial Study.

According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 Project design would 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.

The following specific checklist questions are evaluated applying the foregoing methodology.

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. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

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

The site is surrounded by commercial uses, single-family uses, and parking uses. Other than typical cleaning solvents used for janitorial purposes, no hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Project. As described in more detail below in Section 8(b), there are no Aboveground Storage Tanks (AST's) or Underground Storage

Tanks (USTs). However, the commercial use, Cycle Products West, located at 11900 West Pico Boulevard, is identified as a HAZNET facility. The waste categories are reported as “aqueous solution with total organic residues less than 10 percent”, “oil/water separation sludge” and “waste oil and mixed oil”. The disposal method is reported as “storage, bulking or transfer offsite – no treatment/recovery” and “recycler”. The HAZNET listing is not an indication of a hazardous material release or contamination; therefore, this listing is not expected to represent a significant environmental concern.¹⁷ In addition, due to the age of the existing on-site structures, prior to demolition of the existing structures, a lead-based paint survey and a demolition-level asbestos survey would be conducted at the Project Site and, if discovered, would be removed per standard abatement and construction procedures in accordance with existing regulations and overseen by regulatory agencies. Furthermore, Project construction activities would result in a temporary increase in the use of typical construction materials at the site. 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. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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.

The Phase I ESA reports were conducted in general conformance with the scope and limitations of ASTM Standard Practice E1527 and PREI guidelines for Phase I ESAs. The analyses consisted of: (1) a project Site and adjacent site reconnaissance; (2) interviews with key personnel; (3) review of historical sources; (4) a review of regulatory agency records; and (5) a review of a regulatory database report. In addition, the analysis included general information regarding asbestos containing materials, lead-based paints, radon, and oil and gas exploration.

¹⁷ *Phase I Environmental Site Assessment Pico Boulevard, 11900-11936 West Pico Boulevard, Los Angeles, California, 90064, prepared by Partner Engineering and Science, Inc., September 16, 2014.*

Review of Historical Site Use

The Project Site was developed with one commercial structure from 1928 to 1945. Between 1948 and 1968 several additional commercial structures were added to the Project Site. From 1970 to the present the Project Site consisted of a parking lot and commercial structures.

Review of Aerial Photographs

Aerial photographs from 1928 to 2012 were reviewed which confirmed the site uses and surrounding uses.

Review of Sanborn Fire Insurance Maps

Sanborn maps from 1950 and 1970 were reviewed which confirmed the site uses and surrounding uses.

Review of City Directories

Based on a review of City directories, the site uses and surrounding uses were confirmed.

Review of Historical Topographic Maps

Based on a review of historic topographic maps, the site uses and surrounding uses were confirmed

Regulatory Agency Records Review

Local, state, and federal agencies, such as environmental health departments, fire prevention bureaus and building and planning departments were contacted to identify any current or previous reports of hazardous materials use, storage, and/or unauthorized releases that may have impacted the Project Site.

Addresses for the Project Site were not listed on any of the databases reviewed with the exception of 11900 West Pico Boulevard. The current tenant, Cycle Products West, is on the HAZNET database. The waste categories are reported as “aqueous solution with total organic residues less than 10 percent”, “oil/water separation sludge” and “waste oil and mixed oil”. The disposal method is reported as “storage, bulking or transfer offsite – no treatment/recovery” and “recycler”. The HAZNET listing is not an indication of a hazardous material release or contamination; therefore, this listing is not expected to represent a significant environmental concern. No further investigation was recommended.

No regulatory records other than those discussed above were found for the Project Site addresses at the Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), City of Los Angeles Building Department (LABD), or the California Division of Oil, Gas and Geothermal Resources (DOGGR). No off-site facilities were listed in the databases reviewed that would appear to present an environmental concern for the Project Site. Impacts would be less than significant.

Asbestos-Containing Materials

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be presumed to contain asbestos, for purposes of this regulation. All thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building constructed prior to 1981 and have not been appropriately tested are “presumed asbestos-containing material” (PACM).

Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. However, removal of ACM in a building is not unusual and can be readily accomplished. In accordance with the EPA’s NESHAP regulation and SCAQMD Rule 1403, all materials which are identified as ACM would be removed by a trained and licensed asbestos abatement contractor before demolition. The asbestos removal operations would be conducted in accordance with Cal-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal Projects is limited. Regulations include the requirement of conducting the removal of certain ACM from within enclosed work areas, keeping the ACM wet during removal to reduce dust, ensuring that employees wear protective equipment, and collecting air samples during the removal operations to ensure that airborne fiber levels are within acceptable levels.

The Project Site buildings were constructed in 1925, 1937, 1955, and 1961. An asbestos survey was conducted at the building in the 2014 and ACMs were identified. Asbestos would be removed in accordance with federal, City and State regulations, including but not limited to SCAQMD’s Rule 1403 (for ACMs). This would ensure that the ACM removal and demolition activities do not present significant exposure potential to the residential and school uses in the vicinity of the Project Site.

Lead-Based Paint

Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm² (or 5,000 ug/g or 0.5% by weight) or more of lead. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as “Title X”, to protect families from exposure to lead from paint, dust, and soil. Under Section 1017 of Title X, intact LBP on most walls and ceilings is not considered a “hazard,” although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated. Further, Section 1018 of this law directed the Housing and Urban Development (HUD) and the US EPA to require the disclosure of known information on LBP and LBP hazards before the sale or lease of most housing built before 1978. Given the presumed date of construction (pre-1978) of the buildings on the Project Site, there is the potential that lead-based paint (LBP) may be present in the existing building.

Exposure of persons to LBP during demolition activities would also constitute a potentially significant hazardous material impact. Provided the LBP from the Project Site would be removed in accordance with federal, City and State regulations, including but not limited to OSHA's LBP regulations, hazardous materials impacts relative to exposure to lead would be less than significant.

Radon

According to the U.S. Environmental Protection Agency (EPA), the Project Site, being located in Los Angeles County, is situated within Radon Zone 2, with a predicted average indoor radon screening level between 2 and 4 picoCuries per Liter (pCi/L, moderate potential), which is below the 4.0 pCi/L action level set by the United States Environmental Protection Agency (USEPA). Therefore, impacts would be less than significant.

Oil and Gas Exploration

The Division of Oil, Gas, and Geothermal Resources (DOGGR) was contacted to determine the location of petroleum activity in the area of the Project Site. According to the DOGGR, no oil wells appear to be located on the Project Site or adjoining properties. No further investigation was recommended.

Methane

The Project Site is not located within a "Methane Zone" as designated by Los Angeles Department of Building and Safety (LADBS).¹⁸ No further investigation was recommended.

Mold

Molds are microscopic organisms found virtually everywhere, indoors and outdoors. Mold will grow and multiply under the right conditions, needing only sufficient moisture (e.g. in the form of very high humidity, condensation, or water from a leaking pipe, etc.) and organic material (e.g., ceiling tile, drywall, paper, or natural fiber carpet padding). No obvious indications of water damage or mold growth were observed. No further investigation was recommended.

Review of Adjacent Properties

No items of environmental concern were identified on the adjacent properties, including hazardous substances, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards. No further investigation was recommended.

¹⁸ *City of Los Angeles Department of City Planning, Parcel Profile Report, website: www.zimas.lacity.org, accessed February 5, 2015.*

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

The closest school to the Project Site is Little Village Nursery School, located 0.07 mile northeast of the Project Site, on West Pico Boulevard. As discussed in Checklist Question 8(a), the Project would not employ hazardous or acutely hazardous materials above those commonly used for maintenance and janitorial services associated with residential and restaurant settings. The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. Further, as discussed above in checklist question 8 (a) and (b), the Project Site not does not contain any oil or gas wells or ASTs/USTs. Furthermore, during demolition and construction activities, ACMs and LBPs would be removed in accordance with federal, City and State regulations, including but not limited to OSHA's LBP regulations and SCAQMD's Rule 1403 (for ACMs).. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and a less-than- significant impact would occur.

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.

As discussed in Section 8(b), an environmental database report was reviewed for local, state, and federal listings for the Project Site. The assessment has revealed no evidence of environmental concerns in connection with the Project Site, and no further investigation is recommended. In addition, the Project

Site is not a City designated Hazardous Waste / Border Zone Property.¹⁹ Therefore, no impact would occur related to hazardous materials sites and no mitigation measures would be 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?**

Less Than Significant 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 closest public airport to the Project Site is the Santa Monica Municipal Airport located 0.6 mile south. As discussed in Checklist Question 8(a), the Project would not employ hazardous or acutely hazardous materials above those commonly used for maintenance and janitorial services associated with residential and restaurant settings. The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. Furthermore, the Project Site is not located within the airport land use plan or an airport hazard area.²⁰ Therefore, no impact would occur and no mitigation measures would be 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 would be required.

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

¹⁹ City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: www.zimas.lacity.org, accessed February 5, 2015.

²⁰ City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: www.zimas.lacity.org, accessed February 5, 2015.

- A Project involved possible interference with an emergency response plan or emergency evacuation plan.

According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- 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.

The Project is not located on or near an adopted emergency response or evacuation route.²¹ The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way (see Section 16, Transportation/Traffic of this Initial Study). Therefore, the Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant and no mitigation measures would be 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if the 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 highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Fire High Fire Hazard Severity Zone (VHFHSZ).²² Therefore, no impacts from wildland fires would occur and no mitigation measures would be required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with any other projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City. However, the potential impact associated with the Project would be less than significant and, therefore, would not substantially contribute to a cumulative impact.

²¹ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Critical Facilities & Lifeline Systems in the City of Los Angeles*, April 1995.

²² City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: www.zimas.lacity.org, accessed February 5, 2015.

With respect to the other projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, 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, the Project would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials and no mitigation measures are required.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 (CWC) 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 specific 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 the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

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 Order No. R4-2012-0175, NPDES No. CAS00400, 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 the County. Section VI.D.8, of this Permit, Development Construction Program, requires Permittees (which include the City of Los Angeles) 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. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and Federal mandated guidelines for storm water 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.

“With respect to runoff water quality during operation of the Project, Los Angeles County and all cities within LA County (except for the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of this 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, would thus apply to the Project. This Program requires, among other things, that Projects retain on site the runoff volume from: (a) the .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 Standard Urban Stormwater Mitigation Plan (SUSMP) adopted by the Regional Water Quality Control Board for the Los Angeles Region. As a permittee, the City of Los Angeles is responsible for implementing the requirements of the County-wide SUSMP within the City. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the 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 drainage system. The system incorporated into the Project must follow specific 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 and no mitigation measures would be required.

In addition, the Project would be subject to the provisions of the City’s Low Impact Development (LID) Ordinance effective May 12, 2012, 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 Best Management Practices (BMPs) that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater. The LID Ordinance would require the Project to incorporate LID standards and practices to encourage the beneficial use of rain water 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, Department of Building and Safety 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 site. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the current site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site in comparison to existing conditions. Thus, impacts would be less than significant and no mitigation measures would be required.

- 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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); or
 - 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 Report (Appendix E), historic high groundwater level in the vicinity of the Project Site is on the order of 30 feet below the ground surface. Groundwater was not encountered in any of the exploratory boring excavations to the maximum explored depth of 40 feet below the existing ground surface. It should be anticipated that groundwater levels in the subsurface soils can fluctuate due to rainfall, irrigation, and other sources, as well as vary across the site. It is anticipated that excavation to a depth of approximately 32 feet below grade for the construction of the Project would be performed. This is a conservative estimate. Despite any potential change in groundwater level due to seasonal variation in rainfall or future site development, it is unlikely that Project excavation would reach the existing water table. Because excavation activities would terminate above the likely groundwater table, excavation activities would not result in the alteration of groundwater flows beneath the Project Site.

Construction of the Project would be required to comply with the City of Los Angeles UBC and the California Building Code. With compliance with existing regulations, implementation of all site-specific requirements identified in the Geotechnical Study (see Appendix E to this Draft Initial Study), impacts associated with the depletion of groundwater supplies or interference with groundwater recharge would be less than significant.

- 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 is regulated by the Los Angeles Building Code (Sections 91.7000 through 91.7016 of the LAMC). The Los Angeles 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. Also included in these requirements is the provision that any grading work in excess of 200 cubic yards (cu.yd.) that would occur between November 1 and April 15 (the "rainy season") must include an erosion control system approved by the Department of Building and Safety.

Under the NPDES, the State Water Resources Control Board has issued two general stormwater discharge permits for Los Angeles County to cover industrial and construction activities. The permits are required for specific industry types based on standard industrial classification and for construction activities on five acres or more.

The RWQCB oversees implementation and enforcement of the general permits, including Waste Discharge Requirements (WDR). The Public Works Department, Bureau of Engineering, Stormwater Management Division, is the agency responsible for overseeing implementation of permit responsibilities for the City. Presently, under the General Construction Stormwater Permit, projects greater than five acres are required to incorporate, to the maximum extent possible, permanent or post-construction BMPs in project planning and design. The Project Site is 0.631 acre. Furthermore, during Project construction, a temporary alteration of the existing on-site drainage pattern may occur. These changes would not result in substantial erosion or siltation due to stringent controls imposed via NPDES, SWPP, LID and SUSMP regulations as discussed under Section 8(a).

Furthermore, the Project Site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity. However, if not properly designed and constructed, the Project could increase the potential that surface water runoff could be redirected and cause flooding. As noted, all the runoff associated with the Project would be either directed to landscaped areas or directed to the existing storm drain system and would not encounter unprotected soils. The Project would include a drainage system with pipes that would adequately convey surface

water runoff into the existing storm drain that is currently in West Pico Boulevard. Therefore, the Project would not exceed capacity of the existing or planned storm water drainage systems or result in substantial erosion or siltation on- or off-site. Impacts are anticipated to be less than significant and no mitigation measures would be 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 upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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.

The Project Site is fully developed and runoff flows to the local stormdrain system during a storm event. The Project would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain that is currently in West Pico Boulevard. Therefore, the Project would not substantially alter the existing drainage pattern of the Project area. Project impacts would be less than significant and no mitigation measures would be 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 upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 (CWC) 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 specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A Project-related significant adverse effect would also occur if the Project would substantially increase the probability that polluted runoff would reach the storm drain system.

As noted, all the runoff associated with the Project would be either directed to landscaped areas or directed to the existing storm drain system and would not encounter unprotected soils. The Project would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain that is currently located in Pico Boulevard. In addition, the Project would be subject

to the provisions of the Low Impact Development (LID) Ordinance effective May 12, 2012, 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 Best Management Practices (BMPs) that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater. The LID Ordinance would 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, Department of Building and Safety and Department of Public Works that expand the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the site. Therefore, impacts would be less than significant and no mitigation measures would be required.

f) Would the Project otherwise substantially degrade water quality?

Less than Significant Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the LID and SUSMP and City of Los Angeles Stormwater Management Program. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Operation-Related Project Impacts

Activities associated with operation of the Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the subterranean parking could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, and the SWRCB. Further, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the Project to minimize the off-site conveyance of pollutants and impacts would be less than significant.

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

The Project is not located within a City designated Flood Hazard Zone.²³ Therefore, the Project would not place housing within a 100-year flood hazard area. No impact would occur and no mitigation measures would be required.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 Section 9(g), the Project Site is not in an area designated as a 100-year flood hazard area.²⁴ The Project is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. No impact would occur and no mitigation measures would be required.

²³ City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: www.zimas.lacity.org, accessed February 10, 2015.

²⁴ City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: www.zimas.lacity.org and City of Los Angeles Department of City Planning, *General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles*, March 1994.

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. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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, which is 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 City-designated potential inundation area.²⁵ However, the Project Site is not located within an area designated by FEMA as presenting substantial flooding risks associated with a 100- or 500-year flooding event. Furthermore, the Project Site is located four miles from the Pacific Ocean and is not in the vicinity of any other major water bodies; therefore, risks associated with inundation by seiches or tsunamis would be considered extremely low at the Project Site. Therefore, impacts related to potential inundation from the failure of a levee or dam would be considered less than significant and no mitigation measures would be 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?

Less Than Significant. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 the 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 within a City-designated potential inundation area.²⁶ However, the Project Site is not located within an area designated by FEMA as presenting substantial flooding risks associated with a 100- or 500-year flooding event. Furthermore, the Project Site is located four miles from the Pacific Ocean and is not in the vicinity of any other major water bodies; therefore, risks associated with inundation by seiches or tsunamis would be considered extremely low at the Project Site. The Project Site is located in a highly urbanized area of the City, where little open space exists. Therefore, the potential for mudflows to impact the Project Site would also be highly unlikely. Impacts would be less than significant with respect to risk of loss, injury, or death by seiche, tsunami, or mudflow and no mitigation measures would be required.

²⁵ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Inundation and Tsunami Hazard Areas, 1996.*

²⁶ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Inundation and Tsunami Hazard Areas, 1996.*

Cumulative Impacts

Less Than Significant Impact. As discussed above, the Project Site and the surrounding area are served by existing storm drains. Runoff from the Project Site and local urban uses is typically directed into the area streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, other projects would also drain to the surrounding street system. In addition, other projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative impacts related to storm water drainage systems and water quality would be less than significant and no mitigation measures would be required.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 consistency with existing surrounding land uses in terms of land use function, scale, and intensity.

The Project Site is located in an urbanized setting north of the Santa Monica (I-10) freeway in West Los Angeles. The Project Site is surrounded by commercial uses, single-family uses, multi-family uses, and surface parking. Directly west of the Project Site is a one-story restaurant, Chan Dara. Just beyond Chan Dara is a two-story commercial building with several retail uses. Northwest of the Project Site, across Pico Boulevard, are one-story commercial uses, including a sushi restaurant and several animal related retail uses. North of the Project Site, across Pico Boulevard, is a one-story strip mall containing a laundry mat, food-mart, massage parlor, Goodwill donation center, and a drycleaners. Northeast of the Project Site, across Pico Boulevard, are several commercial uses located in one-story buildings. These uses include a tutoring center, Tutoring Club, a nursery school, Little Village Nursery School, and a commercial business, Delta Graphics. Directly east of the Project Site, across an unnamed alleyway, is a two-story commercial use, consisting of a carpet and window treatment business, Home. Further east

of the Project Site are additional two-story commercial uses consisting of an office use and a dive shop. Southwest, south, and southeast of the Project Site, across an unnamed alleyway, is a single-family neighborhood.

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. Since the Project would be developed within a long-established urban area along an existing street grid system, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. The Project would not create a conflict of scale, intensity, or use that would serve as a physical division. The Project is consistent with the CDO of standards for compatible development along this stretch of Pico Boulevard. Since the Project would not physically disrupt or divide the surrounding established community, no impact would occur and no mitigation measures would be 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?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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;
- 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 West Los Angeles community of the City of Los Angeles. 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 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*, *SCAG's Southern California Compass Blueprint Growth Vision Report*, the South Coast Air Quality Management District's (SCAQMD) *2007 Air Quality Management Plan (AQMP)*, and the Los Angeles County Metropolitan Transportation Authority's (Metro) *Comprehensive Management Plan 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)*, *Community Design Overlay District (CDO)*, *West Los Angeles Transportation Improvement and Mitigation 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 City of Los Angeles Planning Department *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 an environmental impact analysis.

Southern California Association of Government 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 III-9 (Project Consistency with Applicable Regional Comprehensive Plan Goals), presents an analysis of the consistency of the Project with those goals.

**Table III-9
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 would develop a mixed-use project. The Project Site is served by several bus lines along Pico Boulevard, including the Santa Monica Big Blue Bus. Additionally, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015).
Creating significant areas of mixed-use development and walkable, “people-scaled” communities.	Consistent. The Project Site is located in an area of West Los Angeles that is currently considered to be walkable and “people-scaled”. The portion of Pico Boulevard where the Project Site is currently located has sidewalk cafés and retail store fronts; features which are all

**Table III-9
Project Consistency with the Applicable Regional Comprehensive Plan Goals**

Goal	Project Consistency
	considered to be “people-scaled”. The Project would further this goal by placing a mixed-use project with restaurant uses on the ground floor.
Targeting growth in housing, employment, and commercial development within walking distance of existing and planned transit stations.	Consistent. The Project Site is served by several bus lines along Pico Boulevard, including the Santa Monica Big Blue Bus. In addition, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015). The Project would develop a residential uses within walking distance of bus lines and transit stations.
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 mixed-use Project on a property that is partially used for surface parking and contains a vacant use in the dense urban area of West Los Angeles.
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.
<i>Source: Southern California Association of Governments, Final 2008 Regional Comprehensive Plan, October 2008; EcoTierra Consulting, 2015.</i>	

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

Southern California Compass Blueprint Growth Vision

The *Southern California Compass Blueprint Growth Vision Report* (Compass Growth Vision), published by SCAG in June 2004, presents a comprehensive vision for growth in the six-county SCAG region, as well as the means of achieving that growth vision. The Compass Growth Vision is intended to provide planning guidance and mechanisms for improved mobility, livability, prosperity, and sustainability for all Southern Californians by reorienting development around existing and planned transportation infrastructure on just two percent of the region’s land area.

The Compass Growth Vision’s “2 Percent Strategy” calls for changes to current land use and transportation trends within the 2 Percent Strategy Opportunity Areas. The intent of the 2 Percent Strategy is to increase the region’s mobility by encouraging transportation investments and land use decisions that are mutually supportive; locating new housing near existing jobs and new jobs near

existing housing; encouraging transit-oriented development; and promoting a variety of travel choices. The strategy has identified a series of opportunity areas having a high potential to implement projects, plans, and/or policies consistent with the principles resulting in the aforementioned benefits.

The Compass Growth Vision principles and related strategies are as follows:

- *Principle 1.* Improve mobility for all residents. Strategies to support Principle 1 include: (a) encourage transportation investments and land use decisions that are mutually supportive; (b) locate new housing near existing jobs and new jobs near existing housing; (c) encourage transit-oriented development; and (d) promote a variety of travel choices.
- *Principle 2.* Foster livability in all communities. Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote “people scaled,” pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.
- *Principle 3.* Enable prosperity for all people. Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.
- *Principle 4.* Promote sustainability for future generations. Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize “green” development techniques.

The four main principles of the Compass Growth Vision and their applicability to the Project are discussed below.

Principle 1. Improve Mobility For All Residents

The Project would be consistent with the Compass Growth Vision goal to improve mobility for all residents. The Project Site is served by several bus lines along Pico Boulevard, including the Santa Monica Big Blue Bus. Additionally, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015). The Project would, therefore, be consistent with the Compass Growth Vision principle to improve mobility for all residents.

Principle 2. Foster Livability In All Communities

The Project Site is located in an area of West Los Angeles that is currently considered to be walkable and “people-scaled”. The portion of Pico Boulevard where the Project Site is currently located has sidewalk

cafes and retail store fronts; features which are all considered to be “people-scaled”. The Project would further this goal by placing a mixed-use project with restaurant uses on the ground floor. Also, the Project is consistent with pedestrian created design guidelines in the CDO. The Project would be consistent with the Compass Growth Vision principle to foster livability in all communities.

Principle 3. Enable Prosperity For All People

This principle is primarily an economic objective, not directly related to environmental impacts. Nevertheless, the proposed residential and restaurant uses would provide a variety of skilled and unskilled jobs, both high-wage and entry-level employment opportunities and career growth opportunities with potential benefits for the regional economy. The Project would provide employment opportunities and, thus, would be consistent with the Compass Growth Vision principle to enable prosperity for all people. The Project also includes 9 very low-income units.

Principle 4. Promote Sustainability For Future Generations

The Project would meet the requirements of the City Green Building Code, which includes the installation of water conservation and energy efficient design elements. In addition, the Project would include space for bicycle parking. Therefore, the Project would be consistent with the Compass Growth Vision principle to promote sustainability for future generations.

Overall, the Project would be consistent with the principles of the Compass Growth Vision.

Regional Transportation Plan / Sustainable Communities Strategy

Federal guidelines require that all new regionally significant transportation projects be included in a *Regional Transportation Plan* (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 (RTIP). 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 *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future* (RTP/SCS) on April 4, 2012. 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 III-10 (Consistency of the Project With Applicable Goals of 2012-2035 RTP/SCS).

**Table III-10
Consistency of the Project With
Applicable Goals of 2012-2035 RTP/SCS**

Goal	Project Consistency
Maximize mobility and accessibility for all people and goods in the region.	Consistent. The Project Site is served by several bus lines along Pico Boulevard, including the Santa Monica Big Blue Bus. Additionally, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015). The Project would develop residential uses, market rate and nine low-income units, within walking distance of existing bus lines and transit stations.
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 proposed mixed-use project is located in a dense urban area, and would be a greater density than what currently exists on the Project Site. In addition, the Project Site is served by several bus lines operated by the Santa Monica Big Blue Bus, along Pico Boulevard. Additionally, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015). The Project would develop residential uses within walking distance of existing bus lines and transit stations. The Project would provide opportunities for employees and visitors to use public transit for work trips, and walk to other retail businesses within and near the Project Site.
Protect the environment and health of our residents by improving air quality, and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent. The Project would also provide a total of approximately 200 bicycle spaces, including 90 restaurant (six long-term and 84 short-term) and 110 residential (100 long-term and 10 short-term) spaces. Pedestrian access to the Project Site would be provided via the sidewalk along Pico Boulevard. The Project would provide opportunities for employees and visitors to walk to other retail businesses within and near the Project Site.
Encourage land use and growth patterns that	Consistent. The Project Site is served by several bus lines

**Table III-10
Consistency of the Project With
Applicable Goals of 2012-2035 RTP/SCS**

Goal	Project Consistency
facilitate transit and non-motorized transportation.	<p>along Pico Boulevard, including the Santa Monica Big Blue Bus. Additionally, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015). The Project would develop residential uses within walking distance of existing bus lines and transit stations.</p> <p>The Project would also provide a total of approximately 200 bicycle spaces, including 90 restaurant (six long-term and 84 short-term) and 110 residential (100 long-term and 10 short-term) spaces. Pedestrian access to the Project Site would be provided via the sidewalk along Pico Boulevard.</p> <p>The Project would provide opportunities for employees and visitors to use public transit for work trips, and walk to other retail businesses within and near the Project Site.</p>
<p><i>Source: Southern California Association of Governments, 2012-2035 RTP/SCS, April 2012; EcoTierra Consulting, 2015.</i></p>	

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 unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. Air quality

impacts of the Project and consistency of the project impacts with the AQMP are analyzed in greater detail under Section 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 Section 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 III-11 (Consistency of with the Applicable Objectives and Policies of the Framework Element).

**Table III-11
Consistency with the Applicable Objectives and Policies of the Framework Element**

Objective/Policy	Project Consistency
Land Use Chapter	
<p>Objective 3.1: Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses, and visitors.</p>	<p>Consistent. The Project would develop a mixed-use Project with residential and restaurant uses in the dense urban area of West Los Angeles. The Project would contribute to the diversity of land uses along Pico Boulevard, which currently includes office, retail, restaurant, residential, and other land uses.</p>
<p>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.</p>	<p>Consistent. The Project Site is served by several bus lines along Pico Boulevard, including the Santa Monica Big Blue Bus. Additionally, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015). The Project would develop residential uses within walking distance of existing bus lines and transit stations. The Project would provide opportunities for employees and visitors to use public transit for work trips, and walk to other retail businesses within and near the Project Site. As such, the Project would support the reduction of vehicle trips, vehicle miles travelled, and air pollution.</p>
<p>Policy 3.2.1: Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.</p>	<p>Consistent. The Project would include the development of residential and restaurant uses. As such, the Project would support the currently active neighborhood/corridor along Pico Boulevard.</p>
<p>Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p>Consistent. The Project would also provide a total of approximately 200 bicycle spaces, including 90 restaurant (six long-term and 84 short-term) and 110 residential (100 long-term and 10 short-term) spaces.</p> <p>Pedestrian access to the Project Site would be provided via the sidewalk along Pico Boulevard. The Project would provide opportunities for employees and visitors to use</p>

**Table III-11
Consistency with the Applicable Objectives and Policies of the Framework Element**

Objective/Policy	Project Consistency
	public transit for work trips, and walk to other retail businesses within and near the Project Site.
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 residential and restaurant uses along Pico Boulevard in the dense urban area of West Los Angeles. The Project would comply with the CDO pedestrian-oriented design guidelines.
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 Palms-Mar Vista-Del Rey community, which includes a mix of commercial, residential, and office land uses. The Project would not encroach upon or cause the removal or relocation of land uses in existing neighborhoods or districts.
Objective 3.17: Maintain significant and architectural districts while allowing for development of economically viable uses.	Consistent. As further discussed under Question 5(a), the Project would have a less-than-significant impact on historic resources.
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 Site is served by several bus lines along Pico Boulevard, including the Santa Monica Big Blue Bus. Additionally, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015). 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 provide residential and restaurant uses in the dense urban area of West Los Angeles. Project buildout would also be of a scale that is appropriate in West Los Angeles. As previously discussed, the land uses would support transit use.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and	Consistent. The Project Site is located in an area of West Los Angeles that is currently considered to be walkable. The portion of Pico Boulevard where the Project Site is currently located has sidewalk cafes and retail store fronts; all of which serve as a focus of activity for the community.

**Table III-11
Consistency with the Applicable Objectives and Policies of the Framework Element**

Objective/Policy	Project Consistency
<p>centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.</p>	<p>The Project would also further this objective by placing restaurant uses on the ground floor.</p>
<p>Policy 5.8.1: Buildings in pedestrian-oriented districts and centers should have the following general characteristics:</p> <ul style="list-style-type: none"> a. An exterior building wall high enough to define the street, create a sense of enclosure, and typically located along the sidewalk; b. A building wall more-or-less continuous along the street frontage; c. Ground floor building frontage designed to accommodate commercial uses, community facilities, or display cases; d. Shops with entrances directly accessible from the sidewalk and located at frequent intervals; e. Well lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, when appropriate; f. Ground floor building walls devoted to display windows or display cases; g. Parking located behind the commercial frontage and screened from view and driveways located on side streets where feasible; h. Inclusion of bicycle parking areas and facilities to reduce the need for vehicular use; and i. The area within 15 feet of the sidewalk may be an arcade that is substantially open to the sidewalk to accommodate outdoor dining or other activities. 	<p>Consistent. The Project would include many of the design characteristics listed in this policy. The ground floor would be easily accessible to pedestrians along Pico Boulevard.</p> <p>The Project would also provide a total of approximately 200 bicycle spaces, including 90 restaurant (six long-term and 84 short-term) and 110 residential (100 long-term and 10 short-term) spaces.</p> <p>Overall, the Project would comply with the CDO pedestrian-oriented design guidelines.</p>
<p><i>Source: City of Los Angeles, The Citywide General Plan Framework Element, website: http://cityplanning.lacity.org/cwd/framwk/contents.htm. Accessed November 5, 2014; EcoTierra Consulting, 2015.</i></p>	

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

City of Los Angeles General Plan Framework Element

In order to ensure that on-site residences would not be adversely impacted by elevated ambient urban noise levels and operations of mixed-uses on-site, Mitigation Measure XII-60 shall be implemented to ensure that dwelling units associated with the Project would be constructed in accordance with Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. Furthermore, implementation of Mitigation Measure XII-60 would require that the Project Applicant submit evidence to the City's Department of Building and Safety of a means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room of the project. With implementation of Mitigation Measure XII-60, impacts associated with interior noise levels at the proposed residences would be less than significant.

Mitigation Measures

XII-60 Increased Noise Levels (Mixed-Use Development)

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

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 guides land uses on the Project Site and in the surrounding areas. The current plan sets forth planning goals and objectives to maintain the community's distinctive character.

Within the Community Plan, the Project Site is designated as General Commercial. The Project would be consistent with the General Plan land use designations. The proposed residential land use is allowed in the General Commercial land use designation. The zoning designation (discussed below under "Planning and Zoning Code") that applies to the Project Site is [Q]C2-1VL-CDO. With the requested floor area ratio (FAR) on-menu incentive, the Project would have an FAR of 3.1:1. As such, the proposed FAR would be consistent with the Community Plan land use designation

The Project’s consistency with the applicable policies of the Community Plan is presented in Table III-12 (Consistency with Applicable Policies of the Palms-Mar Vista-Del Rey Community Plan).

**Table III-12
Consistency with Applicable Policies of the Palms-Mar Vista-Del Rey Community Plan**

Policy	Project Consistency
1-1.1. Provide for adequate multi-family residential development.	Consistent. The Project would include approximately 100 multi-family residential units within the West Los Angeles community.
1-1.2. Protect the quality of residential environment and the appearance of communities with attention to site and building design.	Consistent. The Project would be visually integrated with the existing character of the area, which is an area predominantly characterized by commercial development. Moreover, the Project would be an urban-scale development with active ground floor commercial uses that would be reflective of the expected visual character of Pico Boulevard, a designated Major Highway.
1-1.3. Protect existing single-family residential neighborhoods from new out-of scale development and other incompatible uses.	Consistent. The Project has been carefully designed to reflect and respect the low-density residential neighborhood to the south of the Project Site, while also recognizing that these residential units are in a transitional zone between commercial and residential uses. The Project has provided wide 17 foot setbacks and would step down in height towards the R1 neighborhood across the alleyway.
1-2.1. Locate higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development.	Consistent. The Project would include approximately 100 multi-family residential units within the West Los Angeles community, where sufficient public infrastructure and services exist. The Project Site is served by several bus lines along Pico Boulevard, including the Santa Monica Big Blue Bus.
1-4.1. Promote greater individual choice in type, quality, price and location of housing.	Consistent. The Project would include approximately 100 multi-family residential units within the West Los Angeles community. The apartments would include single, one-bedroom, two-bedroom units and nine low-income units. As such, the Project includes a variety of housing types.
1-4.2. Ensure that new housing opportunities minimize displacement of residents.	Consistent. The Project Site is currently developed with several commercial uses and four vacant residential units. No residents would be displaced.
2-1.1. New commercial uses should be located in existing established commercial areas or shopping centers.	Consistent. The proposed commercial land uses would be located in the northern portion of the Project Site, along Pico Boulevard. Pico Boulevard, a designated

**Table III-12
Consistency with Applicable Policies of the Palms-Mar Vista-Del Rey Community Plan**

Policy	Project Consistency
	<p>Avenue I (Major Highway Class II), is an established commercial area with retail, restaurant, and office land uses. Furthermore, the Project would be in compliance with West Pico Boulevard CDO by providing a building that will enhance the appearance of the area (as discussed in more detail below). Therefore, the proposed commercial land uses would be located within an existing established commercial area.</p>
<p>2-1.2. Protect commercially planned/zoned areas from encroachment by residential only development.</p>	<p>Consistent. The Project is a mixed-use development that includes commercial and residential land uses on a commercially zoned property. Therefore, the Project would protect commercially zoned areas from encroachment by residential only development and provide active ground floor commercial uses.</p>
<p>2-1.4. Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.</p>	<p>Consistent. The ground floor of the Project would be designed to a pedestrian-scale with entrances to the commercial and residential land uses on along Pico Boulevard. The proposed ground-floor commercial land uses would have entrances facing Pico Boulevard, which is a designated Avenue I (Major Highway Class II). Sidewalks and landscaping would front the Project. Furthermore, the Project would be in compliance with West Pico Boulevard CDO by providing a building that will enhance the appearance of the area (as discussed in more detail below). Therefore, the Project’s design considers quality, character, and compatibility with existing land uses.</p>
<p>2-2.1. Encourage Pedestrian-oriented design in designated areas and in new development.</p>	<p>Consistent. The ground floor of the Project would be designed to a pedestrian-scale with entrances to the commercial and residential land uses on along Pico Boulevard. The proposed ground-floor commercial land uses would have entrances facing Pico Boulevard, which is a designated Avenue I (Major Highway Class II). Sidewalks and landscaping would front the Project. Furthermore, the Project would be in compliance with West Pico Boulevard CDO by providing a building that will enhance the appearance of the area (as discussed in more detail below). Therefore, the Project would have a pedestrian-oriented design.</p>

Table III-12
Consistency with Applicable Policies of the Palms-Mar Vista-Del Rey Community Plan

Policy	Project Consistency
<p>2-2.2. Require that mixed-use projects and development in pedestrian oriented areas are developed according to specific design guidelines to achieve a distinctive character and compatibility with surrounding uses.</p>	<p>Consistent. The ground floor of the Project would be designed to a pedestrian-scale with entrances to the commercial and residential land uses on along Pico Boulevard. The proposed ground-floor commercial land uses would have entrances facing Pico Boulevard, which is a designated Avenue I (Major Highway Class II). Sidewalks and landscaping would front the Project. Therefore, the Project’s design considers quality, character, and compatibility with existing land uses.</p>
<p>2-2.4. Promote mixed use projects along designated transit corridors and in appropriate commercial centers.</p>	<p>Consistent. The Project would develop a mixed-use project. The Project Site is served by several bus lines along Pico Boulevard, including the Santa Monica Big Blue Bus. Additionally, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion by the end of this year (2015).</p>
<p>2-3.1. Require that the design of new development be compatible with adjacent development, community character and scale.</p>	<p>Consistent. The Project’s proposed land uses would be consistent with the existing surrounding land uses. The Project would provide residential and restaurant uses in the dense urban area of West Los Angeles. Project buildout would also be of a scale that is appropriate in West Los Angeles.</p>
<p>2-3.2. Establish commercial areas and street identity and character through appropriate sign control, landscaping and streetscape.</p>	<p>Consistent. The Project would include way-finding and identification signs. Landscaping would be provided along Pico Boulevard fronting the Project Site.</p>
<p><i>Source: City of Los Angeles, Palms-Mar Vista-Del Rey Community Plan, adopted September 16, 1997; EcoTierra Consulting, 2015.</i></p>	

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

West Los Angeles Transportation Improvement and Mitigation Specific Plan

The Project Site is located in the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). The WLA TIMP was adopted on March 8, 1997 with the intent to:

1. Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new development within the WLA TIMP Area;

2. Establish the Transportation Impact Assessment Fee process for new development in the C, M and P zones;
3. Require that new development mitigate Significant Transportation Impacts caused by development in the R-3 and less restrictive zones;
4. Regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses;
5. Establish a WLA TIMP Area infrastructure implementation process;
6. Promote areawide transit enhancement through additional transit lines, shuttles, transit centers and facilities which expedite transit flow;
7. Promote or increase work-related ridesharing and bicycling to reduce peak-hour Trips and to keep critical intersections from severe overload;
8. Prevent Peak Hour Level of Service (LOS) on streets and intersections from reaching LOS "F" or, if presently at LOS "F" preclude further deterioration in the Level of Service;
9. Promote neighborhood protection programs to minimize intrusion of commuter traffic through residential neighborhoods;
10. Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
11. Ensure that the public transportation facilities that will be constructed with funds generated by the WLA TIMP will significantly benefit the contributor; and
12. Encourage Caltrans to widen the San Diego Freeway for high occupancy vehicle (HOV) lanes.

As further discussed under Question 16(a), the Project would generate a net reductions in site-related trips during both the AM and PM peak hours. As required under Section 4.E.1 of the WLA TIMP, the Project would include applicable highway dedications and improvements as required by the LADOT or guarantee them pursuant to the Department of Public Work's B-permit procedures. However, no traffic assessment or mitigation measures are required under Section 4.E.2 or E.3 of the WLA TIMP. Consistent with Section 5 of the WLA TIMP, the Applicant would pay the applicable Traffic Impact Assessment fee for the Project's commercial component. Therefore, the Project would comply with the WLA TIMP.

Overall, the Project would be consistent with applicable plans, policies, and regulations, and the associated impact would be less than significant. No mitigation measures are required.

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. The Project Site is zoned [Q]C2-1VL-CDO (Commercial – Height District 1, Very Limited Height District, Community Design Overlay District).

Land uses allowed in the C2 zone include, but are not limited to, the following:

- Any use permitted in the C1.5 Limited Commercial Zone or in the C1 Limited Commercial Zone.

- Art or antique shop.
- Bird store or taxidermist, or a pet shop for the keeping or sale of domestic or wild animals.
- Carpenter, plumbing or sheet metal shop.
- Catering shop.
- Feed and fuel store.
- Interior decorating or upholstering shop.
- Sign painting shop.
- Tire shop.
- Restaurant, tearoom or cafe (including entertainment other than dancing) or a ground floor restaurant with an outdoor eating area.

The Project would be consistent with the current C2 zone in the Planning and Zoning Code. The Project Site would be developed with multi-family uses and restaurant uses, as allowed in the C2 zone. In addition, the Project would comply with all applicable yard and setback requirements set forth in the Planning and Zoning Code.

The Project Site is located in Height District 1VL. LAMC Section 12.21.1 limits the height of structures in the C2-1VL zone to 45 feet. However, pursuant to LAMC Section 12.25-A,25, the Project is requesting a height increase to 56 feet for only the portion of the building fronting Pico Boulevard (beyond 100 feet from the nearest R1 zoned property to the south of the Project Site) in the C2 zone as part of the on-menu incentives to provide Very Low Income housing (see Section II, Project Description).

Pursuant to LAMC Section 12.25-A,25 Density Bonus and Affordable Housing Incentives, the Project is requesting:

- On-menu incentive to increase the allowable floor area from 1.5 to 1 to 3 to 1 and to increase the height from 45-feet to 56 feet on the portion of the building fronting Pico Boulevard; and
- off-menu incentives/waiver of development standards to waive transitional height limitations for the back portion of the building within 100-feet from the nearest R-1 zoned property and to allow five stories in lieu of the permitted three stories.

Parking requirements for commercial development are subject to the Planning and Zoning Code. Section 16(f) describes the vehicle and bicycle parking requirements as well as the amounts provided by the Project. As shown therein, the Project would comply with the vehicle and bicycle parking requirements in the Planning and Zoning Code.

Community Design Overlay District

The Project Site is designated in a West Pico Boulevard CDO, which includes commercially and industrially zoned properties located between the San Diego Freeway (I-405) on the east, Tennessee Avenue to Federal Avenue on the north, Pico Boulevard to the south, and Centinela Avenue (City boundary) on the west. The West Pico Boulevard CDO, provides guidance and direction in the design of buildings including storefronts that will enhance the appearance of the area. The overall CDO goal for Pico Boulevard is Pico Boulevard to present a distinct identity as the neighborhood's main commercial corridor, and that development visually provides a sense of place. Pico Boulevard has the potential of becoming an active, vibrant and vital community serving, pedestrian oriented commercial area. An additional goal of the West Pico Boulevard CDO is to encourage a combination of small-scale neighborhood commercial uses with multi-residential. Multi-family dwellings that incorporate commercial uses at the ground floor or multi-family dwellings built to the sidewalk would support an active day and night environment, encourage people to walk and shop in areas near their residences, enhance the social and economic stability of the street, and make the pedestrian environment more attractive, comfortable, and secure. The Project Must obtain a Director's Determination showing compliance with the West Pico Boulevard Community Design Overlay Plan.

Los Angeles Green Building Code

As of January 3, 2014, the City of Los Angeles has implemented Ordinance No. 182849 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 addition (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. The Project would include, at a minimum, low-flow showerheads, low-flow toilets and other plumbing fixtures.

Walkability Checklist: Guidance for Entitlement Review

In January of 2007, the City of Los Angeles Planning Department 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 be provided via Pico Boulevard, which has an approximately 15-foot sidewalk fronting the Project Site.

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,²⁷ 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

²⁷ *The Project does not include the placement of existing utilities underground.*

enhance pedestrian activity. Pedestrian access would be provided via the approximately 14-foot sidewalk along Pico Boulevard. The proposed restaurants would be accessible via Pico Boulevard, which would establish a relationship between the Project and the existing commercial land uses.

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. Restaurant patrons, residents, and visitors would drive their automobiles to the alley way south of the Project Site to access the on-site underground parking garage.

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 be designed to facilitate pedestrian movement where appropriate and used to provide separation between service areas and public zones, as well as to define edges throughout the varying elements of the Project.

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 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.

Health Risk Assessment

In 2005, the California Air Resources Board (ARB) promulgated an advisory recommendation to avoid siting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day. The

Los Angeles City Planning Commission (Commission) reports that freeways are a major source of air pollution and their impact on public health has been and continues to be subject to public health research. Further, the Commission notes that this research traditionally focused on impacts to communities within 500 feet of freeways, however, recent studies have established strong links to negative health outcomes affecting sensitive populations up to and beyond 1,000 feet. The Commission believes that 1,000 feet is a conservative distance to evaluate proposed projects that house populations considered to be more at-risk from the negative effects of air pollution.

For this Health Risk Assessment (HRA), aggregate time series data for the most recent calendar year (2014) was accessed to identify traffic volume (flow) and vehicle speeds to accommodate an assessment of chronic (long term), annual, 24-hour, 8-hour and acute (1-hour) exposures. Refer to Appendix D (Table 1) of this IS/MND for the hourly traffic volumes considered in the following HRA. To produce a representative vehicle fleet distribution, the HRA utilized ARB’s Los Angeles County (South Coast) population estimates for the 2018 calendar year. This approach provides an estimate of vehicle mix associated with operational profiles at the link or intersection level. Refer to Appendix D (Table 2) of this IS/MND for the identified fleet mix considered in this HRA.

Route speeds of 55 and 60 miles per hour for the east and westbound routes were based upon the arithmetic average of hourly speeds reported in the PeMS database for the 2014 calendar year. For congested or minimum speed conditions, 10 and 20 miles per hour were identified and utilized for the east and westbound routes, respectively.

For particulates (PM₁₀ and PM_{2.5}), emissions were quantified through the reentrainment of paved roadway dust. The predictive emission equation developed by the U.S. Environmental Protection Agency (AP-42, Section 13.2.1) was utilized to generate particulate source strength. To account for the mass rate of emissions entrained from the roadway surface, the contribution from exhaust, break and tire wear were added to the AP-42 emission factor equation. Compounds associated with mobile source emissions are presented in Table III-13 (Compounds Emitted From On-Road Mobile Source Activity).

**Table III-13
Compounds Emitted From On-Road Mobile Source Activity**

Pollutant
Benzene
Formaldehyde
1,3-Butadiene
Acetaldehyde
Acrolein
Diesel Particulates
Reentrained Particulates (PM ₁₀ , PM _{2.5})
Carbon Monoxide
Nitrogen Dioxide

Appendix B of the HRA Report (refer to Appendix D of this IS/MND) presents the on-road emission rate calculation worksheets for the freeway segments considered in the assessment.

Exposure Quantification

In order to assess the impact of emitted compounds on individuals who reside within and/or access common areas throughout the Project area, air quality modeling utilizing the AMS/EPA Regulatory Model AERMOD was performed to assess the downwind extent of mobile source emissions located within a 1,000 feet of the Project Site. AERMOD's air dispersion algorithms are based upon a planetary boundary layer turbulence structure and scaling concepts, including the treatment of surface and elevated sources in simple and complex terrain.

For chronic, annual and 24-hour exposures, receptor locations were set at flagpole heights representing residential floor levels and the presumed height above local terrain for proposed heating, ventilation and air conditioning (HVAC) equipment. A graphical representation of the source-receptor grid networks is presented in Appendix D (Figure 2) of this IS/MND. Refer to Appendix D of this IS/MND for a dispersion model input summary table (provided in Appendix C) and complete listing of model input/output files (provided in electronic format in Appendix D).

Risk Characterization

For chronic, annual and 24-hour exposures, concentration estimates for residential receptors are considered static whereby exposures are assumed to be continuous based upon the averaging time under consideration. Short duration exposures (i.e., 1 and 8-hour) apply to all receptor locations including common areas since it is reasonable to assume that an individual could be present for periods of one to eight hours.

Carcinogenic Chemical Risk

Carcinogenic compounds are not considered to have threshold levels (i.e., dose levels below which there are no risks). Any exposure, therefore, will have some associated risk. As a result, the State of California has established a threshold of one in one hundred thousand (1.0E-05) as a level posing no significant risk for exposures to carcinogens regulated under the Safe Drinking Water and Toxic Enforcement Act (Proposition 65). This threshold is also consistent with the maximum incremental cancer risk established by the SCAQMD for projects prepared under the auspices of the CEQA. Health risks associated with exposure to carcinogenic compounds can be defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration.

To represent residential exposures, the HRA employed the EPA's guidance to develop viable dose estimates based on reasonable maximum exposures (RME). As a result, lifetime risk values for residents were adjusted to account for an exposure duration of 350 days per year for 30 years (i.e., 95th

percentile). A 9-year exposure duration was additionally assessed to identify risk estimates associated with the average time individuals are reported to reside at a given residence. For body weight and inhalation, the assessment employed average adult values of 70 kilograms and 20 cubic meters per day, respectively.

Table III-14 (Maximum Residential Receptor/Carcinogenic Risk), presents the maximum predicted residential receptor risk estimates for each identified floor level. Appendix A, Tables A1 through A10, present the URF's and corresponding cancer potency factors for carcinogens considered in the HRA (refer to Appendix D of this IS/MND). Carcinogenic risk estimates for both the 30-year and 9-year exposure scenarios did not exceed the level posing a significant risk for all residential receptors. Impacts would be less than significant.

Table III-14
Maximum Residential Receptor/Carcinogenic Risk

Floor Level	Exposure Scenario	
	30 Year	9 Year
1	1.0E-05	3.1E-06
2	1.0E-05	3.0E-06
3	9.6E-06	2.9E-06
4	8.5E-06	2.5E-06
5	6.8E-06	2.1E-06

Noncarcinogenic Hazards

An evaluation of the potential noncancer effects of contaminant exposures was also conducted. To quantify noncarcinogenic impacts, the hazard index approach was used. The hazard index assumes that subthreshold exposures adversely affect a specific organ or organ system (i.e., toxicological endpoint). For each discrete pollutant exposure, target organs presented in regulatory guidance were utilized. Appendix A, Tables A1 through A10, (refer to Appendix D of this IS/MND) present the REL's and corresponding reference dose values used in the evaluation of chronic noncarcinogenic exposures.

For chronic noncarcinogenic effects, the hazard index identified for each toxicological endpoint totaled less than one for all 30 year and 9 year exposure scenarios. For short duration exposures, the hazard indices for the identified averaging times did not exceed unity. Therefore, noncarcinogenic hazards were predicted to be within acceptable limits. Impacts would be less than significant.

Criteria Pollutant Exposures

The State of California has promulgated strict ambient air quality standards for various pollutants. These standards were established to safeguard the public's health and welfare with specific emphasis on protecting those individuals susceptible to respiratory distress, such as asthmatics, the young, the elderly and those with existing conditions which may be affected by increased pollutant concentrations.

However, recent research has shown that unhealthful respiratory responses occur with exposures to pollutants at levels that only marginally exceed clean air standards. Table III-15 (California Ambient Air Quality Standards) presents the California Ambient Air Quality Standards (CAAQS) for the criteria pollutants considered in the assessment.

**Table III-15
California Ambient Air Quality Standards**

Pollutant	Standard	Health Effects
Particulates (PM ₁₀)	>50 µg/m ³ (24 hr avg.) >20 µg/m ³ (Annual)	1) Excess deaths from short-term exposures and the exacerbation of symptoms in sensitive individuals with respiratory disease. 2) Excess seasonal declines in pulmonary function especially in children.
Particulates (PM _{2.5})	>12 µg/m ³ (Annual)	1) Excess deaths and illness from long-term exposures and the exacerbation of symptoms in sensitive individuals with respiratory and cardio pulmonary disease.
Carbon Monoxide (CO)	>9.0 ppm (8 hr avg.) >20.0 ppm (1 hr avg.)	1) Aggravation of angina pectoris and other aspects of coronary heart disease. 2) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease. 3) Impairment of central nervous system functions. 4) Possible increased risk to fetuses.
Nitrogen Dioxide (NO ₂)	>0.18 ppm (1 hr avg.)	1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups. 2) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes.

Pollutant emissions are considered to have a significant effect on the environment if they result in concentrations that create either a violation of an ambient air quality standard, contribute to an existing air quality violation or expose sensitive receptors to substantive pollutant concentrations. Should ambient air quality already exceed existing standards, the SCAQMD has established significance criteria for selected compounds to account for the continued degradation of local air quality. Background concentrations are based upon the highest observed value for the most recent three year period.

For PM₁₀ emissions, background concentrations representative of the project area exceed the CAAQS for the annual averaging time. As a result, a significant impact is achieved when pollutant concentrations produce a measurable change over existing background levels. For fine particulates, no measurable

change criterion currently exists. As a result, the SCAQMD significance threshold of $2.5 \mu\text{g}/\text{m}^3$ for the 24-hour averaging time is used to assess $\text{PM}_{2.5}$ impacts.

For the PM_{10} 24-hour averaging time, CO 1 and 8-hour averaging times and the NO_2 1-hour averaging time, background concentrations are below current air quality standards. As such, significance is achieved when pollutant concentrations add to existing levels and create an exceedance of the CAAQS.

Table III-16 (Northwest Coastal L.A. County Monitoring Summary/Source-Receptor Area 2), shows the pollutant concentrations collected at the Northwest Coastal L.A. County Monitoring Station (Source-Receptor Area 2) for the last three years of available data. Table III-17 (SCAQMD Air Quality Significance Thresholds) outlines the relevant significance thresholds considered to affect local air quality.

Table III-16
Northwest Coastal L.A. County Monitoring Summary/Source-Receptor Area 2

Pollutant/Averaging Time	Year			
	2011	2012	2013	Maximum
Particulates (PM_{10}) 24-Hour	41	31	38	41
Particulates ($\text{PM}_{2.5}$) 24-Hour	NA	NA	NA	NA
Particulates (PM_{10}) Annual	21.7	19.8	20.8	21.7
Carbon Monoxide (CO) 1-Hour	3.6	2.1	1.9	3.6
8-Hour	1.3	1.4	1.3	1.4
Nitrogen Dioxide (NO_2) 1-Hour	0.0813	0.0613	0.0512	0.0813
<p><i>Note: PM_{10} concentrations are from the Southwest Coastal L.A. County Monitoring Station (Source-Receptor Area 3). PM_{10} concentrations are expressed in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). All others are expressed in parts per million (ppm).</i></p> <p><i>Source: South Coast Air Quality Management District, U.S Environmental Protection Agency.</i></p>				

For PM_{10} , maximum predicted concentrations exceed the identified significance threshold for the annual averaging time for floor levels 1 through 5. Without mitigation, these emissions may impact the health of sensitive individuals. Limiting particulate infiltration can be accomplished by installing and maintaining air filtration systems with efficiencies equal to or exceeding Minimum Efficiency Reporting Values (MERV) as defined by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. Table III-18 (Particulate Filter Efficiencies), lists the identified floor levels and associated filter requirements for the heating, ventilation and air conditioning (HVAC) control equipment.

Table III-17
SCAQMD Air Quality Significance Thresholds

Pollutant	Averaging Time	Pollutant Concentration
Particulates (PM ₁₀)	24-Hours	Source-Receptor Area 3 reports concentrations below the CAAQS. Impacts are significant if they cause or contribute to an exceedance of the 50 µg/m ³ standard.
Particulates (PM _{2.5})	24-Hours	2.5 µg/m ³ (operation)
Particulates (PM ₁₀)	Annual	1.0 µg/m ³
Carbon Monoxide (CO)	1/8-Hours	SCAQMD is in attainment; impacts are significant if they cause or contribute to an exceedance of the following attainment standards 20 ppm (1-hour) and 9 ppm (8-hour).
Nitrogen Dioxide (NO ₂)	1-Hour	SCAQMD is in attainment; impacts are significant if they cause or contribute to an exceedance of the following attainment standard 0.18 ppm.
<i>Abbreviations: ppm: parts per million; µg/m³: micrograms per cubic meter. Source: South Coast Air Quality Management District.</i>		

Table III-18
Particulate Filter Efficiencies

Floor Level	MERV Rating
1	>11
2	>11
3	>11
4	>11
5	>10

As noted in Table III-19, (Maximum Residential Receptor/PM₁₀ MERV Filter Mitigation), incorporation of the above filter design will reduce particulate exposures to a level of insignificance. Therefore, with implementation of mitigation measure III-50 impacts would be less than significant.

PM₁₀ and PM_{2.5} concentrations for the 24-hour averaging time did not exceed their respective significance thresholds. Table III-20 (Maximum Residential Receptor / PM₁₀ and PM_{2.5}) presents the maximum predicted particulate concentrations for each identified floor level. Impacts would be less than significant.

Table III-19
Maximum Residential Receptor/PM₁₀ MERV Filter Mitigation

Floor Level	Pollutant/Averaging Time PM ₁₀ Annual
1	<u>0.8869</u>
2	0.87232
3	0.84596
4	0.77878
5	0.92277

Note: Concentrations are expressed in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). Concentration reductions are based upon a 65 percent removal efficiency for particle size bins 3.0-10.0 and 1.0-3.0 micrometers for floors 1-4. For floor 5, concentration reductions are based upon a 50 percent removal efficiency for particle size bin 1.0-3.0 micrometers.

Table III-20
Maximum Residential Receptor / PM₁₀ and PM_{2.5}

Floor Level	Pollutant / Averaging Time		
	PM ₁₀ 24 Hour	PM ₁₀ Annual	PM _{2.5} 24 Hour
1	5.18140	2.53912	2.01502
2	5.32523	2.49235	2.04793
3	5.31257	2.41704	2.00119
4	4.85431	2.22508	1.79231
5	4.04462	1.84553	1.46458

Note: Concentrations are expressed in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

The maximum modeled 1-hour concentration for CO of 0.34251 parts per million (ppm) ($392.24013 \mu\text{g}/\text{m}^3$) when added to an existing background concentration of 3.6 ppm, will not cause an exceedance of the CAAQS of 20 ppm. For the 8-hour averaging time, the maximum predicted concentration of 0.14912 ppm, ($170.77254 \mu\text{g}/\text{m}^3$) when added to an existing background level of 1.4 ppm, does not cause an exceedance of the CAAQS of 9 ppm. Therefore, impacts would be less than significant.

For NO₂, the maximum one hour concentration of 0.02980 ppm ($56.07273 \mu\text{g}/\text{m}^3$) was predicted. This concentration, when added to a background concentration of 0.0813 ppm, will not cause an exceedance of the CAAQS of 0.18 ppm. Therefore, impacts would be less than significant.

Mitigation Measure

To ensure that impacts related to annual particulate exposures from the reentrainment of paved roadway dust for residents located on floors 1 through 5 or reduced to a level of insignificance, the following mitigation measure is recommended:

III-50 Installing and maintaining air filtration systems with efficiencies equal to or exceeding Minimum Efficiency Reporting Values (MERV) of 11 (MERV 11) as defined by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 (refer to Appendix D of this IS/MND).

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project-related 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 Section 4 (f) above, no such plans presently exist which govern any portion of the Project Site. Furthermore, the Project Site is located in an area which is already fully developed with institutional, office, commercial, and residential uses, and is also within a heavily urbanized area of North Hollywood. Therefore, the Project would not have the potential to cause such effects and there would be no impact. No mitigation measures would be required.

Cumulative Impacts

Less Than Significant Impact. The study area for the land use cumulative impacts analysis includes the Project Site and the Palms-Mar Vista-Del Rey Community Plan area. The Project would not result in any significant impacts related to consistency with land use plans or compatibility with surrounding land uses. As discussed above, the Project would be consistent with all applicable land use regulations and policies and it would be compatible with surrounding land uses and no mitigation measures would be required.

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?

Less Than Significant Impact. As described in the *L.A. CEQA Thresholds Guide, 2006*, "underlying the City of Los Angeles are finite deposits of non-renewable mineral resources, including petroleum and natural gas, limestone, and aggregate (e.g., rock, sand, and gravel). Development that includes placement of structures over resource areas or blocks access to a resource area results in the loss of

availability of resources. Impacts are related to the characteristics of the resource and the degree of loss.

Federal, State and City agencies regulate or have documented the presence of mineral resources. The State Geologist, California Division of Mines and Geology (CDMG), and State Mining and Geology Board (SMGB) provide assistance and direction with regard to mineral resources. The SMGB uses a classification system that divides land into four Mineral Resource Zones (MRZ) based on quantity and significance of mineral resources. Projects located within the MRZ-2 designation are subject to City policies established in Section VII, Mineral Resources, of the Conservation Element.”

Therefore, a significant impact may occur if a Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if a project development would convert an existing or future regionally-important mineral extraction use to another use, or if a project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, a 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 was fully developed at one point and no oil wells are present on the Project Site.²⁸ 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, major oil drilling area, or located within immediate proximity to the State-Designated boundaries of the Los Angeles Downtown Oil Field. As the Project Site was entirely development at one point, impacts on existing or future regionally-important mineral extraction sites are less than significant. According to the City General Plan Conservation Element Exhibit A, the Project Site is not located near or in a mineral resources zone. Therefore, less than significant would occur with implementation of the Project and no mitigation measures would be required.

²⁸ City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: www.zimas.lacity.org, accessed February 17, 2015.

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. As noted above, according to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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.

Because the Project Site is subject to the applicable land use and zoning requirements in LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code), it is subject to development standards for the various districts in the City of Los Angeles. There are no oil extraction operations and drilling or mining of mineral resources at the Project Site.²⁹ 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. Thus, no impact associated with mineral resources would occur and no mitigation measures would be required.

Cumulative Impacts

No Impact. As discussed above, the Project would not have significant impacts on mineral resources. It is not known if any other projects in the vicinity would result in the loss of availability of known mineral resources. Regardless, the Project would have no incremental contribution to the potential cumulative impact on mineral resources, and the Project would have no cumulative impact on such resources and no mitigation measures would be required.

12. 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

²⁹ *City of Los Angeles Department of City Planning, Parcel Profile Report, website: www.zimas.lacity.org, accessed February 17, 2015.*

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, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, 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} – An L_{eq} , or 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_{max} – The maximum instantaneous noise level experienced during a given period of time.
- L_{min} – The minimum 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 5 dBA “weighting” during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. 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. For residential uses, 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. 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 would 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).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some

individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, 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 normal 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. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. 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 normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.³⁰

- a) **Would the Project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Potentially Significant Unless Mitigation Incorporated. 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). See 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 further detail below.

Construction Noise

Construction-related noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or

³⁰ *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

techniques during the operation of the equipment. Additionally, as defined in the L.A. CEQA Thresholds Guide threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the L.A. CEQA Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the project would require the use of heavy equipment for demolition, grading, excavation and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table III-21 (Noise Range of Typical Construction Equipment), and Table III-22 (Typical Outdoor Construction Noise Levels), respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

The noise levels shown in Table III-22 (Typical Outdoor Construction Noise Levels) represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in Table III-22 (Typical Outdoor Construction Noise Levels), construction noise during the heavier initial periods of construction is presented as 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the project would be expected to occur and generate noise at off-site locations consistent with the estimates provided in Table III-22 (Typical Outdoor Construction Noise Levels).

The nearest sensitive receptors that could potentially be subject to noise impacts associated with construction of the project include residential uses to the southeast across the alley, a daycare use to the north across W. Pico Boulevard, and residential uses to the north across W. Pico Boulevard fronting Westgate Avenue. See the Noise Monitoring and Sensitive Receptor Location Map included as Figure III-4 (Noise Monitoring and Sensitive Receptor Location Map). To identify the existing ambient noise levels in the general vicinity of the Project Site, noise measurements were taken with a 3M SoundPro SP DL-1 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) –

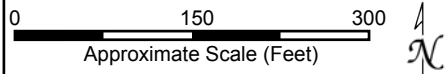


Legend

- ① Residential uses to southeast
- ② Daycare to north
- ③ Residential uses to north

Project Site

Noise Monitoring Locations



Aerial Source: Google Earth 2015.

Specification for Sound Level Meters/Type 1. Additionally, this noise meter meets the requirement specified in LAMC Section 111.01(I) that the instruments be “Type S2A” standard instruments or better. This instrument was calibrated and operated according to the manufacturer’s written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above grade. The measured noise levels are shown in Table III-22 (Existing Ambient Daytime Noise Levels in Project Site Vicinity).

**Table III-21
Noise Range of Typical Construction Equipment**

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet ^a
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

^a 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: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

**Table III-22
Typical Outdoor Construction Noise Levels**

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

**Table III-23
Existing Ambient Daytime Noise Levels in Project Site Vicinity**

No.	Location	Primary Noise Sources	Noise Levels ^a		
			L _{min}	L _{max}	L _{eq}
1	North of the Project Site, in front of the daycare use along W. Pico Boulevard.	Traffic and pedestrian activity along W. Pico Boulevard.	57.2	81.4	69.5
2	Near northwest corner of Project Site, along W. Pico Boulevard	Traffic and pedestrian activity along W. Pico Boulevard.	57.0	78.6	67.3
3	Near southeast side of Project Site, in front of residential uses along alley.	Traffic and pedestrian activity along alley; residential activity.	56.0	81.4	61.3

^a Noise measurements were taken on March 27, 2015 at each location for a duration of 15 minutes. See Appendix H to this Draft IS/MND for noise data.

Due to the use of construction equipment during the construction phase, the Project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to those previously listed above in Table III-22 (Typical Outdoor Construction Noise Levels). Specifically, Table III-24 (Estimated Exterior Construction Noise at Nearest Sensitive Receptors), shows the peak estimated construction noise levels that could occur at the nearest sensitive uses during construction of the Project.

As shown in Table III-24 (Estimated Exterior Construction Noise at Nearest Sensitive Receptors), the construction noise levels forecasted for the proposed construction work during each phase of development associated with the Project would result in noise increases at all of the identified sensitive receptors. It should be noted, however, that any increase in noise levels at off-site receptors during construction of the project would be temporary and intermittent in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., demolition and grading work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed building) as the physical structure of the proposed structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

**Table III-24
Estimated Exterior Construction Noise at Nearest Sensitive Receptors**

Sensitive Land Uses^a	Distance to Project Site (feet)	Existing Monitored Daytime Ambient Noise Levels (dBA L_{eq})	Estimated Peak Construction Noise Levels (dBA L_{eq})	Noise Level Increase
1. Residential uses to the southeast	25	61.3	92.0	30.7
2. Daycare use to the north	100	69.5	79.9	10.4
3. Residential uses to the north	230	61.3	72.7	11.4

^a See Noise Monitoring and Sensitive Receptor Location Map in Appendix H to this Draft IS/MND. Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

As discussed previously and illustrated above, typical construction noise levels associated with the project could exceed 75 dBA at 50 feet from the Project Site. As defined in the Los Angeles CEQA Thresholds Guide threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the L.A. CEQA Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact. Since construction activities at the Project Site would last for more than ten days in a three-month period, the project would cause a significant noise impact during construction if the ambient exterior noise levels at the identified sensitive receptors would be increased by 5 dBA or more. Based on the results shown in Table III-24 (Estimated Exterior Construction Noise at Nearest Sensitive Receptors), the ambient exterior noise levels at all of the sensitive receptors could be exceeded by 5 dBA or more. Thus, based on criteria established in the L.A. CEQA Threshold Guide, a substantial temporary or periodic increase in ambient noise levels could occur at the identified off-site sensitive receptors.

LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited 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. Demolition and construction activities are prohibited on Sundays and all federal holidays. The construction activities associated with the project would comply with these LAMC requirements. In addition, pursuant to LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. Although the estimated construction-related noise levels associated with the Project would exceed the numerical noise threshold of 75 dBA at 50 feet from the noise source as outlined in LAMC Section 112.05, and the typical construction noise levels associated

with the Project would exceed the existing ambient noise levels at the identified off-site sensitive receptors by more than the 5 dBA threshold established by the L.A. CEQA Thresholds Guide during construction, implementation of the following mitigation measures would reduce the noise levels associated with construction of the Project to the maximum extent that is technically feasible. Specifically, the use of barriers such as plywood structures, flexible sound control curtains, or intervening construction trailers, could reduce line-of-sight noise levels by approximately 10 dbA.³¹ Thus, based on the provisions set forth in LAMC 112.05, implementation of Mitigation Measures XII-20 would ensure impacts associated with construction-related noise levels are mitigated to the maximum extent feasible and temporary construction-related noise impacts would be considered less than significant.

Mitigation Measures

XII-20 Increased Noise Levels (Demolition, Grading and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- The project developer shall install a temporary noise control barrier around the construction site abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent multifamily residential structures with a goal of a reduction of 10 dBA. The barrier shall be a similar height to the abutting residential buildings. The supporting structure shall be engineered and erected according to applicable

³¹ *Based on a review of Table 4 of the FHWA Noise Barrier Design Handbook (July 14, 2011), the design feasibility of a sound barrier that reduces noise by 5 dBA is considered "simple" and a reduction of up to 10 dBA as "attainable." And, reductions of 15 and 20 dBA are considered "very difficult" and "nearly impossible," respectively.*

codes. The temporary barrier shall remain in place until all windows have been installed and paving activities are complete.

Operational Noise

Upon completion and operation of the project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed for the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing uses on the Project Site or adjacent buildings in the Project vicinity. As such, the HVAC equipment associated with the project would not represent a new source of noise in the Project Site vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. This impact would be considered less than significant and no mitigation measures would be required.

b) Would the Project result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

Less Than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, 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 groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. 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 groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration

Construction activities for the project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) adopted vibration standards for buildings which are used to evaluate potential impacts related to construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:³²

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

Table III-25 (Vibration Source Levels for Construction Equipment), identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table III-25 (Vibration Source Levels for Construction Equipment), vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity,

³² *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction –Induced Vibration Guidance Manual, June 2004.*

with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

**Table III-25
Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

With respect to construction vibration impacts upon existing off-site structures, there are no historical buildings or buildings that are extremely susceptible to vibration damage within 25 feet of proposed heavy construction activity. As shown in Table III-25 (Vibration Source Levels for Construction Equipment) above, at distances beyond 25 feet from the Project Site boundary, construction related vibration levels would not have the potential to exceed 0.089 PPV. As discussed previously, the most restrictive threshold for building damage from vibration is 0.12 PPV for historic buildings and buildings that are extremely susceptible to vibration damage, and the least restrictive threshold is 0.5 PPV at any building that is constructed with reinforced-concrete, steel, or timber. As maximum off-site vibration levels at existing structures would not have the potential to exceed 0.089 PPV, the project's construction activities would not exceed the identified thresholds of significance for building damage from vibration. As such, impacts with respect to building damage upon off-site structures would be less than significant and no mitigation measures would be required.

Operational Vibration

The Project involves the construction and operation of apartments and a restaurant use and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the project would be less than significant and no mitigation measures would be required.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the project. As defined in the City of Los Angeles CEQA Thresholds Guide threshold for operational noise impacts, a project would normally have a significant impact on noise levels from Project operations if the Project causes the ambient noise level measured at the property line of affected uses that are shown in Table III-26 (Community Noise Exposure (CNEL)), to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a Leq standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. As discussed above, the traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the L.A. CEQA Thresholds Guide, if a project would result in traffic that is less than double the existing traffic, then the project’s mobile noise impacts can be assumed to be less than significant.

As stated the Project’s trip generation assessment, a net increase of 198 daily trips would occur, a net decrease of 6 trips would occur in the morning peak hour, and a net decrease of 31 trips would occur in the afternoon peak hour when compared to the existing uses at the Project Site. Therefore, when compared to the existing conditions, it is clear that the Project would not have the potential to double the traffic volumes on any roadway segment in the vicinity of the Project Site. As such, the Project would not have the potential to increase roadway noise levels by 3 dBA, and thus traffic generated noise impacts would be considered less than significant. No mitigation measures would be required.

**Table III-26
Community Noise Exposure (CNEL)**

Land Use	Normally Acceptable^a	Conditionally Acceptable^b	Normally Unacceptable^c	Clearly Unacceptable^d
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---
^a <i>Normally Acceptable:</i> Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements. ^b <i>Conditionally Acceptable:</i> New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. ^c <i>Normally Unacceptable:</i> New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. ^d <i>Clearly Unacceptable:</i> New construction or development should generally not be undertaken. Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.				

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed buildings at the Project Site. As discussed in Question 11(a) above, the design of this equipment would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant and no mitigation measures would be required.

Parking Noise

Noise would be generated by activities within the proposed 2.5 subterranean parking levels. Sources of noise within the parking areas would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. It is anticipated that parking related noise would be substantially similar to the existing noise generated by the existing surface parking lot on the Project Site, existing street parking and roadway activity, existing surface parking lots in the Project Site vicinity. Proposed parking would be contained within the parking garage and would not be visible from off-site locations. As such, parking related noise under the Project may actually be reduced compared to the noise generated from the existing open-air surface parking areas on site. In addition, parking-related noise generated by motor driven vehicles within and around the Project Site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. With implementation of Mitigation Measure XII-40, noise impacts associated with the project's subterranean parking garage would be less than significant.

Mitigation Measure

XII-40 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

d) **Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Project. As defined in the L.A. CEQA Thresholds Guide threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. In addition, the L.A. CEQA Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

As discussed above, impacts are expected to be less than significant for construction noise and vibration, and operational noise and vibration. The implementation of Mitigation Measures XII-20, XII-40 and XII-

60 would ensure the Project would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity, and these impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Project were located within an airport land use plan and would expose people residing or working in the Project area to excessive noise levels. The Project Site is located approximately 0.6 miles north of the Santa Monica Municipal Airport. However, the Project Site is not located within the 60, 65 or 70 dBA CNEL Contours identified for the airport.³³ In addition, the Project Site is not located within an airport land use plan or within the vicinity of a private airstrip. As such, the Project would not expose people to excessive aircraft noise levels. Therefore, impacts would be less than significant and no mitigation measures would be required.

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

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. As no such facilities are located in the vicinity of the Project Site, no impact would occur and no mitigation measures would be required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with other projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in an already urbanized area of the City. Construction-period noise for the Project and other projects (that are not yet built) would be localized. In addition, other projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the extent feasible. With respect to cumulative traffic noise impacts, based on the proposed project's estimated trip generation, it is clear that the Project would not have the potential to double the existing or future traffic volumes on any roadway segment or study intersection in the vicinity of the Project Site. As such,

³³ *Calendar Year 2013 CNEL Contours, Santa Monica Municipal Airport, August 2014, prepared for the City of Santa Monica by Landrum & Brown; http://www.smgov.net/uploadedFiles/Departments/Airport/Noise_Mitigation/2013_CNEL_Noise_Contours.pdf; accessed April 7, 2015.*

the Project's traffic noise levels would be less than significant. Therefore, cumulative impacts would be less than significant and no mitigation measures would be required.

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. For the purpose of this Initial Study, a significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the Project area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on population and housing growth shall be made considering the following factors:

- 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;
- Whether a project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of a project.

As part of its comprehensive planning process for the Southern California region, SCAG has divided its jurisdiction into 14 subregions. The Project Site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. In 2008, the City of Los Angeles Subregion had an estimated permanent population of approximately 3,770,500 persons, approximately 1,309,900 residences, and approximately 1,735,200 employees.³⁴ By the year 2020, SCAG forecasted an increase to 3,991,700 persons, a 5.9 percent increase, 1,455,700 residences, an 11.1 percent increase, and 1,817,700 employees, a 4.5 percent increase.³⁵

³⁴ SCAG, *Adopted 2012 RTP Growth Forecast, by City*, website: <http://www.scag.ca.gov/forecast/index.htm>, accessed February 17, 2015.

³⁵ *Southern California Association of Governments, SCAG 2012 Growth Forecasts, City of Los Angeles Subregion* <http://www.scag.ca.gov/forecast/downloads/2012GF.xls>, accessed February 17, 2015.

Population

The construction of the Project would create temporary construction-related jobs. In particular, most construction Projects of this size and nature are completed in a timely manner and require specialized workers at various time frames, as needed. As a result, Project-related construction workers are not likely to relocate to the area as a consequence of working on the Project.

Based on the most recent City estimates for the Palms-Mar Vista-Del Rey Community Plan Area, the average household size for dwelling units is 2.28 residents per unit.³⁶ The Project would include up to 100 new units and could result in an increase of approximately 228 residents. The addition of approximately 228 residents represents an increase of 0.006 percent of the total increased resident population estimate for the City of Los Angeles in 2020. This is a conservative estimate given the projected studios and one-bedroom units are expected to have one tenant each. This would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population. As such, population growth associated with the Project would be less than significant and no mitigation measures would be required.

Housing

With respect to housing, the Project would introduce a total of up to 100 multi-family residential units to West Los Angeles. These 100 dwelling units would represent approximately 0.007 percent of the overall estimated housing units for 2020 based on SCAG statistics. This increase would not be considered a substantial increase in housing for the area because the addition of the 100 new housing units is within the anticipated housing increases based on SCAG Projections for housing. As such, housing growth associated with the Project would be less than significant and no mitigation measures would be required.

Employment

With respect to employment, the Project would introduce a total of up to 2,871 square feet of commercial uses to West Los Angeles. The Project would create an estimated seven new employees upon Project operation.³⁷ Employment associated with the Project would represent 0.0004 percent of the overall estimated employment growth for 2020 based on SCAG statistics. This increase would not be considered a substantial increase in employment for the area because the addition of the seven new

³⁶ Los Angeles Department of City Planning, *City of Los Angeles Population & Housing Profile, Community Plan Area: Palms-Mar Vista-Del Rey Community*, website: <http://cityplanning.lacity.org>, accessed February 17, 2015.

³⁷ Southern California Association of Governments, *Employment Density Summary Report, Los Angeles County, "Other Retail/Svc"*. category at 424 sf per employee, October 31, 2001.

employees is within the anticipated employment increases based on SCAG Projections for employees. As such, employment growth associated with the Project would be less than significant and no mitigation measures would be required.

The Project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As a result, the development of the Project would not indirectly induce population growth and impacts would be less than significant. No mitigation measures would be required.

b) Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would result in the displacement of a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on population and housing displacement shall be made considering the following factors:

- A net loss of housing equal to or greater than a one-half block equivalent of habitable housing units through demolition, conversion, or other means; or
- A net loss of any existing housing units affordable to very low- or low-income households (as defined by federal and/or City standards), through demolition, conversion, or other means.

Development of the Project would result in the displacement of four vacant residential units from the Project Site. However, because the Project includes 100 multi-family residential units in a residential area, including nine “very-low income” units, the four displaced residential units would be replaced, including the addition of “very-low income” units to the Project area. Furthermore, the Project would develop an additional 96 residential units beyond the ones displaced. Therefore, the Project would not result in the displacement of a substantial amount of housing units as replacement housing would be included in the Project.

As previously discussed, the 100 dwelling units would represent approximately 0.007 percent of the overall estimated housing units for 2020 based on SCAG statistics. This increase would not be considered a substantial increase in housing for the area because the addition of the 100 new housing units is within the anticipated housing increases based on SCAG projections for housing. As such, housing growth associated with the Project would be less than significant and no mitigation measures would be required.

As discussed in Section 11 (b) above, the Project would be in full compliance with the applicable land use polices of the City of Los Angeles and project impacts would be less than significant and no mitigation measures would be required.

c) Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. For the purpose of this Initial Study, a project-related significant adverse effect could occur if a project would result in the displacement of a substantial amount of people. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on population and housing displacement shall be made considering the following factors:

- A net loss of housing equal to or greater than a one-half block equivalent of habitable housing units through demolition, conversion, or other means; or
- A net loss of any existing housing units affordable to very low- or low-income households (as defined by federal and/or City standards), through demolition, conversion, or other means.

The Project Site is comprised of an existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family. There would be no displacement of people. No impact would occur and no mitigation measures would be required.

Cumulative Impacts

Less Than Significant Impact. As discussed above, the Project would help meet the housing goals of the Housing Element and the applicable policies in the Palms-Mar Vista-Del Rey Los Angeles Community Plan. The Project would include 100 apartments, including nine Very Low Income apartments. The apartments would include single, one-bedroom, and two-bedroom units. Other housing developments that could be constructed in West Los Angeles may or may not combine with the Project to meet the goals in the Housing Element and the Palms-Mar Vista-Del Rey Community Plan. Nonetheless, as the Project's contribution to the housing need in the City is considered to be generally positive, it would therefore, result in a less-than-significant impact and no mitigation measures would be required.

14. PUBLIC SERVICES

Would a 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?

Potentially Significant Unless Mitigation Incorporated. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 adequate if a project is within the maximum response distance for the land use proposed. LAFD has stated that the desired maximum response distance between high density residential land uses and a LAFD fire station is 1.5 miles.³⁸ If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

The Project would be served primarily by Fire Station No. 59, located at 11505 Olympic Boulevard, approximately 0.7 mile from the Project Site. Fire Station No. 59 includes an assessment engine, a paramedic rescues ambulance, one EMS battalion captain, and a rehab air tender.³⁹ Fire Station No. 62, located at 11970 Venice Avenue, approximately 2.4 miles from the Project Site, would also serve the Project Site. Fire Station No. 62 includes an assessment engine and a paramedic rescues ambulance. When fully staffed Fire Station No. 59 contains seven full time staff and Fire Station No. 62 contains six full time staff.⁴⁰ Under LAFD criteria, the existing fire response distance from Fire Station No. 59 to the Project Site would be adequate.

The required fire flow is closely related to the type and size of land use. Under the Los Angeles Fire Code, this Project would be reviewed as residential occupancy, consistent with other types of residential uses near the Project Site. Therefore the hydrant flow requirements would be based on fire flow figures for High-Density Residential Uses. The minimum fire flow requirements for the Project would be at least 4,000 gallons per minute (gpm) at 20 pounds per square inch (psi).⁴¹

The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. As previously noted, the Project conservatively is anticipated to generate 228 residents. As such, the Project could incrementally increase the demand for LAFD services; however, it is not anticipated to increase service ratios, response times, or other performance objectives to the extent that substantial adverse physical impacts would result from the construction of new or physically altered fire facilities. Any potential changes in existing hydrants along the Project frontage would be reviewed by the LAFD prior to site plan approval. Standard LAFD regulations, including access, fire flow and fire prevention measures would be applied to the Project as standard conditions of approval by the LAFD and the City Planning Department.

Construction staging for the Project is not anticipated to block adjacent roadways and would not interfere with LAFD access to the site or surrounding properties. The Project would comply with all

³⁸ *Los Angeles Municipal Code, Chapter V Public Safety and Protection, Article 7, Fire Protection and Prevention, May 15, 1987.*

³⁹ *Los Angeles Fire Department, Fire Station Directory, March 2014.*

⁴⁰ *Los Angeles Fire Department, Fire Station Directory, March 2014.*

⁴¹ *Los Angeles Municipal Code, Chapter V Public Safety and Protection, Article 7, Fire Protection and Prevention, May 15, 1987.*

applicable provisions in the City of Los Angeles Fire and Building Codes. Additionally, the City requires implementation of Standard Mitigation Measures (shown below) to ensure the requisite fire flow for the Project Site. Further, the location and number of any new private hydrants would be determined as part of LAFD's review of the Project plans. Therefore, through compliance with the Mitigation Measure XIV-10, impacts on fire flow would be less than significant.

Since the Project would be within a 1.5-mile fire response distance for a fire station, provide adequate fire flow and access, and meet building fire safety regulations, impacts with respect to fire services would be less than significant.

Mitigation Measures

XIV-10 The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Cumulative Impacts

Less Than Significant Impact. Consistent with existing mechanisms (i.e., property taxes, government funding, and developer fees) to increase funding for fire protection services, the Project and all other projects in the City would be required to monetarily contribute to these funds. Similar to the Project, every project would be individually subject to LAFD review during the building permit process, and would be required to comply with all applicable fire safety standards in order to provide adequate fire protection services. Therefore, it is expected that cumulative impacts would be less than significant and no mitigation measures would be required.

b) Police protection?

Potentially Significant Unless Mitigation Incorporated. 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from a 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 a project's proportional contribution to the demand; and
- Whether a project includes security and/or design features that would reduce the demand for police services.

The Project would be served by the LAPD West Los Angeles Area Police Station located at 1663 Butler Avenue, approximately 1.3 miles northeast of the Project Site, and within the Reporting District 891. The West Los Angeles Area Police Station, which is under the jurisdiction of the West Bureau, serves a community area encompassing 65 square miles, including the Project Site, and contains a population of approximately 228,000.⁴² For the purposes of the LAPD, the West Los Angeles Area boundaries are roughly defined as: Mulholland Drive to the north, Los Angeles City boundary and the 10 Freeway to the south, Los Angeles City Boundary to the east, and the Pacific Coast Highway to the west.⁴³ The station currently has 225 sworn officers and 9 civilian staff representing an officer to population ratio of approximately 1,024 residents per officer.⁴⁴

Response time represents the period of time elapsed from the initiation of an assistance call to the appearance of a police unit at the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services, as discussed above, police units are most often in a mobile state; hence, actual distance between a headquarters facility and a given Project Site is of little relevance. Instead, the number of police officers out on the street is more directly related to the realized response time. The LAPD has a preferred response time of seven minutes to emergency calls. The average response time to emergency calls for service for the West Los Angeles Area Police Station is approximately 7.7 minutes, which is slightly below the LAPD preferred response time of seven minutes.⁴⁵

Implementation of the Project would result in an increase of site visitors, employees, and residents 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

⁴² LAPD website: http://www.lapdonline.org/west_la_community_police_station/content_basic_view/1630, accessed February 17, 2015.

⁴³ Written Correspondence from Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, Los Angeles Police Department, dated April 30, 2015. See Appendix B to this Initial Study.

⁴⁴ Written Correspondence from Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, Los Angeles Police Department, dated April 30, 2015. See Appendix B to this Initial Study.

⁴⁵ Written Correspondence from Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, Los Angeles Police Department, dated April 30, 2015. See Appendix B to this Initial Study.

crimes against persons would be anticipated to occur as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. With the addition of the Project's on-site activity, the resident/officer ratio in the Central Area would be reduced. Although demand for police services is based on residential population, the conservative assumption is that the total potential occupancy of the Project would include approximately 228 residents and seven employees. Since the ratio of residents/employees per officer is approximately 1,024, it is assumed that the addition of 228 residents and seven employees would create the demand for additional officers. It is not anticipated that the addition of officers would require the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Nonetheless, the construction of a Project of this size could have a significant impact on police services in the West Los Angeles Area. Therefore, the Project would incorporate crime prevention measures into Project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional lighting to enhance public safety. With implementation of Mitigation Measures XIV-20 and XIV-30, the Project's impact would be reduced to a less-than-significant level. As described in the mitigation measure, visually obstructed and infrequently accessed "dead zones" would be limited. The building and layout design of the Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive.

Additionally, the Project would be subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Upon completion of the Project, the West Los Angeles Area Commanding Officer would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate police response to the Project Site.

Mitigation Measure

XIV-20 Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

XIV-30 The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

Cumulative Impacts

Less Than Significant Impact. It is anticipated that the Project in combination with other projects and overall population growth in the West Los Angeles area 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, other projects served by the LAPD would implement safety and security features according to LAPD recommendations. If arrest rates and level of demand drop due to implementation on on-site safety measures, fewer officers may be required because the potential for crimes may decrease. Any necessary additional officers are not anticipated to exceed the service capacity of the Division's existing facilities to the extent that extensive new construction of new facilities would be needed. Furthermore, any required additional staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and other projects in the area would contribute. Therefore, the cumulative impact on police services would be less than significant and no mitigation measures would be required.

c) Schools?

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on public schools shall be made considering the following factors:

- The population increase resulting from a project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of Project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and a project's proportional contribution to the demand;
- Whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether a project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

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 Project Site is currently served by the following LAUSD public facility schools:⁴⁶

- Richland Elementary (grades K-6)
- Webster Middle School (7-8)
- University Senior High School (9-12)

As shown in Table III-27 (Estimated Project Student Generation), below, based on 2012 LAUSD student generation rates for multi-family residential and commercial land uses, the Project would generate a net increase of approximately 16 elementary students, 5 middle school students, and 9 high school students, for a total increase of approximately 27 students.

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. As shown in Table III-28 (Project Impact on Public Schools), the addition of 16 new elementary students, 5 new middle school students, and 9 new high school students would not result in the schools surpassing their capacity for students. As such, the increase of 30 new students to the school district would not constitute a substantial increase in student populations to the area that would exceed the capacity in the LAUSD and potentially cause the construction of new or expanded school facilities.

Furthermore, the open enrollment policy is a State-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal’s knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.⁴⁷

⁴⁶ Letter correspondence, Los Angeles Unified School District, Rena Perez, Director, February 18, 2015. See Appendix B to this Initial Study.

⁴⁷ News Release, Los Angeles Unified School District, Office of Communications, April 17, 2000.

**Table III-27
Estimated Project Student Generation**

Elementary School Students	Size	Elementary School Students ^a	Middle School Students ^a	High School Students ^a	Total Students ^b
Existing Uses					
Commercial ^c	13,671 sf	1	1	1	3
Total Existing Student Generation					3
Proposed Uses					
Multi-Family Residences	100 du	16	5	9	27
Restaurant	2,871 sf	1	1	1	3
Subtotal Proposed Student Generation		17	6	10	33
<i>Less Existing Student Generation</i>					3
Total Net Increase in Student Generation					30
<i>Note: du = dwelling unit.</i> ^a Based on LAUSD student generation rates for multi-family residential and commercial: 0.1649 elementary, 0.045 middle and 0.0943 high school students per dwelling unit; 0.0000238 elementary, 0.0000123 middle and 0.0000123 with high school students per square foot of commercial. Los Angeles Unified School District, School Facilities Needs, September 6, 2012. ^b The number of students has been rounded to the nearest whole number. ^c No students were generated for the existing multi-family use as it is currently vacant.					

**Table III-28
Project Impact on Public Schools**

School	2013-2014 Enrollment Capacity	2013-2014 Student Enrollment ^a	Project-Generated Students	Student Enrollment with Project	(-)Under / (+)Over Capacity
Richland Elementary	306	225	16	241	-65
Webster Middle	587	527	5	532	-55
University Senior High School	1,842	1,818	9	1,827	-15
^a Based on actual enrollment versus resident enrollment (total number of students living in attendance boundaries who are eligible to attend the school). Source (2012-2013 enrollment capacity and student enrollment): Written correspondence from Rena Perez, President, Facilities Services Division, Los Angeles Unified School District, February 18, 2015.					

However, to reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). The School Facilities Plan for LAUSD was prepared to support the school district’s levy of the fees authorized by Section 17620 of the California Education Code. The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD.

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. The

provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local law. Therefore, with the payment these fees, impacts to school facilities would be less than significant.

Cumulative Impacts

Less Than Significant Impact. 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, any other projects in the area 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 and no mitigation measures are required.

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.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipal recreation and park facilities within the City. The following parks and recreational facilities are located within a one-mile radius (a standard distance) of the Project Site:

- Stoner Recreation Center, an 8.66-acre neighborhood park located at 1835 South Stoner Avenue.⁴⁸

The Project would involve the construction of 100 apartments and approximately 2,871 square feet of commercial space (containing three restaurants). Compared to the existing three buildings on the Project Site, the Project is expected to increase the on-site population and the associated demand upon park and recreational facilities. However, the Project would be required to pay the applicable Dwelling Unit Tax for the proposed apartments. In addition, the Project would provide 10,300 square feet of open space and recreational amenities for its residents, including a including a gym, a lounge, a community room, common roof deck, and two courtyards. Therefore, the impact on parks and recreational facilities would be less than significant.

⁴⁸ Letter correspondence, City of Los Angeles Department of Recreation and Parks, Ramon Barajas, Assistant General Manager, February 17, 2015. See Appendix B to this Initial Study.

Cumulative Impacts

Less Than Significant Impact. Similar to the Project, any other projects in the area 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 and no mitigation measures are required.

e) Other public facilities?

Less Than Significant Impact. For the purpose of this Initial Study, 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 a project Site. Based on the *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on libraries shall be made considering the following factors:

- The net population increase resulting from a project;
- 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 library services (renovation, expansion, addition or relocation) and the Project's proportional contribution to the demand; and
- Whether a project includes features that would reduce the demand for library services (e.g., library facilities or direct financial support to the Los Angeles Public Library).

The Project area is in the service boundaries of the West Los Angeles Regional Branch Library, located at 11360 Santa Monica Boulevard, approximately 1.50 miles north from the Project Site.⁴⁹ There are currently 10.5 public service employees on staff at the 13,740 square-foot West Los Angeles Regional Branch Library and the library serves an average of 35,269 persons per day. The West Los Angeles Regional Branch Library contains 46,774 volumes.⁵⁰

On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for New Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population and 14,500 square feet for community with more than 45,000 populations and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. While the updated Branch Facilities Plan provides general guidance

⁴⁹ Letter Correspondence with Tom Jung, Management Analyst II, Los Angeles Public Libraries, dated March 2, 2015. See Appendix B to this Initial Study.

⁵⁰ Letter Correspondence with Tom Jung, Management Analyst II, Los Angeles Public Libraries, dated March 2, 2015. See Appendix B to this Initial Study.

on library facility improvements, no new development or renovation of library facilities is currently planned. The West Los Angeles Regional Branch Library meets the current demand for library services and regional library facilities.⁵¹

On March 8, 2011, the voters of the City of Los Angeles approved ballot Measure L, which will amend the City Charter "... to incrementally increase the amount the City is required to dedicate annually from its General Fund to the Library Department to an amount equal to .0300% of the assessed value of all property in the City, and incrementally increase the Library Department's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs, in order to provide Los Angeles neighborhood public libraries with additional funding to help restore library service hours, purchase books and support library programs, subject to audits, using existing funds with no new taxes." Under the terms of Measure L, libraries will be required to pay for their own direct and indirect costs by July 2014.⁵²

The Project would potentially generate approximately 228 residents and seven employees, which would increase the usage of the West Los Angeles Regional Branch Library. The expected increase as a result of the Project would not result in the need for expanded or newly constructed library facilities. However, the Project would impact the demand for library materials, computers and information services. Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and utilized for additional staff, books, computers, and other library materials. Therefore, impacts to library facilities would be less than significant.

In addition to libraries, roadway improvements and/or dedications may be required by the Bureau of Engineering as part of the Project approval process. Compliance with the Bureau of Engineering's requirements for street dedications and improvements would ensure that impacts associated with roadways would remain less than significant..

Cumulative Impacts

Less Than Significant Impact. Other projects with a residential component could generate additional residents who could increase the demand upon library services. However, library funding is now 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 other projects would

⁵¹ Letter Correspondence with Tom Jung, Management Analyst II, Los Angeles Public Libraries, dated March 2, 2015. See Appendix B to this Initial Study.

⁵² Los Angeles Reassignment of Funds for Library System, Measure L (March 2011), website: http://www.ballotpedia.org/wiki/index.php/Los_Angeles_Reassignment_of_Funds_for_Library_System,_Measure_L_%28March_2011%29, February 28, 2015.

be required to pay these fees as applicable. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

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. The Project would be required to pay the applicable Dwelling Unit Tax for the proposed apartments. In addition, the Project would provide 10,300 square feet of open space and recreational amenities for its residents, including a including a gym, a lounge, a community room, common roof deck, and two courtyards. Therefore, the impact on parks and recreational facilities would be less than significant.

- 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

Less Than Significant Impact. Development of the Project would potentially result in an increase in residents in the area. In the absence of these other developments incorporating project-specific mitigation, cumulative development would potentially contribute to lowering the City's existing parkland-to-population ratio. However, other projects may be required to pay Quimby Fees and/or the Dwelling Unit Tax, as appropriate and could include onsite amenities. Additionally, the Project includes recreational amenities that would be used by Project residents, which would help reduce the demand on parks and recreational facilities in the community. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

16. TRANSPORTATION/TRAFFIC

The following section summarizes and incorporates by reference the information provided in the Trip Generation Assessment for Proposed 100-Unit Residential Apartment Project Located at 11916 Pico Boulevard in the West Los Angeles Community of the City of Los Angeles, California prepared by Hirsch/Green Transportation Consulting, Inc., February 5, 2015 (Traffic Report). The Traffic Report is provided as Appendix I 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?**

Less Than Significant Impact. 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.

The Project involves the removal of the existing surface parking lot, three one-story commercial structures, and a vacant two-story four-unit multi-family use and the construction of a five-story, 56-foot tall building, which would include a total of 100 dwelling units on the upper levels, 2,871 square feet of restaurant uses on the ground floor, 129 parking spaces located within the lower levels, and 200 bicycle parking spaces. Based on the current City of Los Angeles Department of Transportation ("LADOT") trip generation threshold criteria, it was determined that the Project would not produce sufficient net new traffic to warrant the preparation of a detailed traffic impact analysis. The development of the Project, including the removal of the existing on-site uses and their associated traffic, would generally result in net reductions in site-related trips during both the AM and PM peak hours, although a slight increase in site-related daily (24-hour) trips could be expected. Specifically, LADOT identifies that projects that generate fewer than 500 net daily or 43 net peak hour trips (during both peak hours) are not typically required to prepare a detailed traffic impact analysis, as it is considered by LADOT that incremental traffic increases at or below these levels are not likely to produce significant traffic impacts to nearby intersections or project-area streets.

Further, although LADOT reserves the right to request that any development project prepare a detailed traffic impact analyses due to other factors beyond the anticipated number of net trips, it has been determined that the Project would provide more than the required amount of parking, and that vehicular access to the on-site parking facilities would be acceptable. Therefore, no special circumstances exist that would warrant a detailed traffic impact analysis for the Project. The specific analyses and evaluations upon which these conclusions are based are contained below.

Construction Traffic Impacts

The Project would be constructed over approximately 18 months. Project construction would involve a minimal number of off-site haul trips for earth-moving purposes, as the Project Site would not require much grading. 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. 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. The mitigation measure includes access restrictions, covered sidewalks, and designating alternative pedestrian routes. Therefore, the traffic impacts associated with the construction activities would be less than significant. Nevertheless, 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. This plan will be revised as needed at Project approval.

Project Trip Assessment

The first step in evaluating the potential for traffic impacts resulting from the Project was the calculation of the number of net new trips that could be generated by the development. The trip generation rates used in this analysis to estimate the amount of traffic produced by both the existing on-site uses and for the Project's residential apartment and ground floor restaurant uses were generally obtained from the 9th Edition of the Trip Generation manual,⁵³ published by the Institute of Transportation Engineers ("ITE"). This publication identifies the typical traffic-generating characteristics for a variety of land uses, and is the primary source for the trip generation information used in most traffic studies conducted in the City of Los Angeles and surrounding jurisdictions. However, the Project Site is also located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation Specific Plan ("WLA

⁵³ *Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington, D.C., 2012.*

TIMP”, City of Los Angeles Ordinance No. 171,492), which identifies traffic management and analysis strategies specifically tailored for the West Los Angeles area surrounding the Project Site. The WLA TIMP provides PM peak hour trip generation rates for a number of land uses, including the existing on-site gym and retail uses, and the Project’s apartment and restaurant uses, although it does not identify trip generation rates for the existing day care facility uses. LADOT requires that the WLA TIMP PM peak hour trip generation rates be utilized whenever applicable, and therefore, this evaluation reflects the WLA TIMP data for the existing gym and retail uses, and for the Project’s apartments and restaurants uses. However, the WLA TIMP does not identify specific daily (24-hour) or AM peak hour trip generation rates, and as such, LADOT recommends the use of the appropriate 9th Edition ITE trip generation rates to estimate the number of trips generated by the existing and proposed uses during these time periods. Information from the ITE Trip Generation manual was also used to identify the PM peak hour inbound/outbound traffic directional characteristics; as noted above, while the WLA TIMP provides the PM peak hour trip rates for various uses, it does not identify the directional traffic characteristics associated with those rates. The trip generation rates and assumptions used to estimate the number of trips generated by the existing and proposed uses are shown in Table III-29 (Existing and Project Uses Trip Generation Rates).

It is of note that the ITE and WLA TIMP trip generation rates shown in Table III-29 (Existing and Project Uses Trip Generation Rates) for the Project’s apartment units, and which were used to as the basis for the trip estimates for this study, are based on data derived from typical “market rate” residential units; the ITE data do not include specific trip generation profiles for “affordable” or “low income” residential units. Although not extensively documented, it is generally acknowledged that low-income residential units generate traffic at a lower “per unit” rate than typical market rate units, due primarily to lower per capita vehicle ownership and a higher reliance on public transit or other non-vehicular means of transportation. Therefore, in recognition of this factor, LADOT’s current (August 2014) Traffic Study Policies and Procedures allow for a reduction of up to five percent in the number of trips calculated using the ITE or WLA TIMP rates for residential projects that provide inclusionary (on-site) “affordable” units, based on the percentage of dwelling units reserved as “affordable” units compared to the total number of units (including the “affordable” units) in the proposed project. As it applies to the Project, the nine “affordable” units represent approximately nine percent of the 100 residential units provided in the proposed development, and as a result, the LADOT “affordable” residential unit trip reduction allowance would result in an adjustment (reduction) of approximately 0.45 percent to the number of “baseline” daily, and AM and PM peak hour trips for this use as otherwise calculated using the typical ITE or WLA TIMP “apartment” trip generation rates shown in Table III-29 (Existing and Project Uses Trip Generation Rates).

**Table III-29
Existing and Project Uses Trip Generation Rates**

Size/Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Uses							
Apartments (ITE 220)	6.65	20%	80%	0.51	65%	35%	0.49
High-Turnover (Sit-Down) Restaurant (ITE 932)	127.15	55%	45%	10.81	60% ^a	40% ^a	12.92 ^a
Existing Uses							
Day Care Center (ITE 565)	4.38	47%	53%	0.80	47%	53%	0.81
Health/Fitness Club (ITE 492)	32.93	50%	50%	1.41	57% ^a	43% ^a	4.30 ^a
Specialty Retail (ITE 826)	40.00 ^b	60% ^b	40% ^b	1.20 ^b	44% ^a	56% ^a	5.00 ^a
<i>Note: sf: square feet</i> ^a Trip generation rates per West Los Angeles Transportation Improvement and Mitigation Specific Plan ("WLA TIMP"). All other rates and information per 9 th Ed. ITE Trip Generation, unless noted. ^b 3% of Daily, per SanDAG. Source: Hirsch/Green Transportation Consulting, Inc., 2015.							

Internal interaction reflects the use of on-site services and amenities by other patrons or residents of the Project Site. It is expected that some residents of the new development would dine on-site at the Project's three small restaurants, which would reduce the number of vehicles traveling to and from these facilities, as well as to and from the larger Project itself (since the Project residents would simply walk down from their apartments to dine on-site rather than leaving the site to dine at an off-site location). However, due to the relatively small size and single use type (restaurant) of the Project's proposed commercial component, on-site resident use of these services is not expected to be substantial, and therefore, no internal interaction adjustments were applied to the Project. Similarly, internal interaction trip reductions for the existing on-site gym, retail, or day care uses were not considered to be applicable.

An additional trip adjustment factor acknowledges the effects of pass-by activity on the Project's traffic generation. The concept of pass-by traffic adjustments involves the "capture" of an existing trip passing by the Project Site. These existing trips are already on the area roadway network for other purposes, such as a trip to or from work, or perhaps to or from other shopping destinations. As these trips pass by the Project Site, the specific convenient facilities provided by the Project, or other factors, produce a stop at the site. Such activity is considered to be an interim stop along a trip which existed without the development of the Project, and therefore vehicles making these stops are not considered to be newly generated project-related traffic.

As shown in Table III-29 (Existing and Project Uses Trip Generation Rates), based on LADOT's recommendations, it was assumed that the existing on-site "retail" use and day care facility each exhibit approximately 10 percent of their associated traffic generation as pass-by trips, while the Project's "restaurant" component and the existing on-site private gym facility are each assumed to exhibit a pass-by factor of approximately 20 percent. Pass-by adjustments are not applicable to the Project's proposed

apartment component, since residential uses are generally considered to be either “origin” or “destination” uses with no appreciable pass-by traffic.

However, while pass-by trip generation adjustments are not considered to be appropriate for the Project’s residential component, it is anticipated that some of the Project residents would make use the available public transit (bus) services located within convenient walking distance of the Project Site. A review of the current public transit service within the general Project vicinity indicates that the Project Site itself is served by several bus lines operated by the Santa Monica Big Blue Bus, including Line 7, a local-stop line, and Rapid Line 7, a limited stop express line, both of which provide service directly to the Project Site along Pico Boulevard, and by Line 6, which runs along Pico Boulevard west of Bundy Drive and Bundy Drive south of Pico Boulevard, and Line 14, which travels through the project vicinity along Bundy Drive/Centinela Avenue.

As shown in Table III-29 (Existing and Project Uses Trip Generation Rates), LADOT’s current Traffic Study Policies and Procedures also identify that projects located within one-quarter mile of a RapidBus transit stop (such as the Rapid 7 Line) are permitted a reduction from the standard trip generation factors, to account for anticipated use of these public transit services. Additionally, it is of note that the Project is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion (along with the remainder of the Expo Line Phase II alignment) by the end of this year (2015). Therefore, although located slightly beyond the generally accepted “convenient” walking distance of one-quarter mile, it is also considered likely that residents of the Project would utilize the Expo Line, which when completed, would provide service between the coastal area of the City of Santa Monica and downtown Los Angeles.

Therefore, based on the anticipated use of the convenient existing bus service, as well as the soon-to-be completed Expo Line, by residents of the Project, it was assumed that a reduction of 15 percent from the “baseline” trip generation calculations identified through the use of the standard trip generation rates shown in Table III-29 (Existing and Project Uses Trip Generation Rates) was applicable and appropriate for the Project’s residential apartment component (including the nine “affordable” units). However, it should be noted that while it is also likely that some of the employees and/or patrons of the Project’s proposed restaurant component, as well as those associated with the existing on-site retail, day care, and private gym facilities may also utilize the convenient transit service in the Project vicinity, in order to provide for a more conservative assessment of the trip generation potential and associated traffic effects of the Project no transit-use related reductions were assumed for any of the site-related commercial uses.

Project Traffic

The potential trip generation for both the existing (prior) and Project uses were calculated, and the results are shown in Table III-30 (Project and Existing Site Uses Trip Generation Estimates). As described previously, these calculations incorporate the anticipated 15 percent transit use reductions for the

Project's residential (apartment) uses, as well as the various pass-by trip reduction factors for both the Project's restaurant component and for the existing on-site retail, day care, and private gym facilities to be removed to construct the Project. As shown in Table III-30 (Project and Existing Site Uses Trip Generation Estimates), the Project itself is expected to generate a total of approximately 853 trips per day, including 68 trips (22 inbound, 46 outbound) during the AM peak hour, and 72 trips (45 inbound, 27 outbound) during the PM peak hour.

However, as shown in Table III-30 (Project and Existing Site Uses Trip Generation Estimates), the demolition of the existing on-site retail, day care, and private gym uses in order to construct the Project would also result in the removal of their associated trips from the "existing" area traffic volumes, thereby offsetting some of the new traffic generated by the new development. These existing uses generate a total of approximately 665 daily trips, including 74 trips (39 inbound, 35 outbound) during the AM peak hour, and 103 trips (51 inbound, 52 outbound) during the PM peak hour. It is important to note that, as shown previously in Table III-30 (Existing and Project Uses Trip Generation Rates), the estimates of the number of trips associated with the existing day care facility were calculated based on the number of students. Although both the ITE Trip Generation manual and the WLA TIMP include trip generation rates for day care facilities based on physical size (square footage), preliminary estimates of the number of trips generated using these rates (ITE daily and AM peak hour trip generation rates of 74.06 trips per 1,000 square feet, and 12.18 trips per 1,000 square feet, respectively, and a WLA TIMP PM peak hour rate of 13.62 trips per 1,000 square feet) identified values of approximately 555 total daily trips, 91 total AM peak hour trips, and 102 total PM peak hour trips for this existing use alone, which are considered to be somewhat excessive. Therefore, in order to provide for a conservative assessment of both the existing day care use's trips and of the overall net trip generation for the Project, the day care facility's existing student enrollment of 87 students was used as the appropriate variable for purposes of this evaluation.

Therefore, as shown in Table III-30 (Project and Existing Site Uses Trip Generation Estimates), once it is developed and occupied, including the removal of the existing on-site uses and their associated trips, it is anticipated that the Project would result in a net increase in site-related trips of about 198 trips per day, although the Project is also expected to result in a net decrease of approximately six trips (reduction of 17 inbound, increase of 11 outbound trips) during the AM peak hour, and a net decrease of approximately 31 trips (reductions of six inbound and 25 outbound trips) during the PM peak hour.

**Table III-30
Project and Existing Site Uses Trip Generation Estimates**

Size/Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Uses							
100-unit Apartment (including 9 “affordable” units)	665	10	41	51	32	17	49
Less 0.5% “Affordable Units” Discount	(3)	0	0	0	0	0	0
Less 15% Transit Use	(99)	(2)	(6)	(8)	(5)	(2)	(7)
<i>Subtotal Proposed Apartment Trips</i>	<i>563</i>	<i>8</i>	<i>35</i>	<i>43</i>	<i>27</i>	<i>15</i>	<i>42</i>
2,871 sf Restaurant (high-turnover)	362	17	14	31	22	15	37
Less 20% Pass-By Trips	(72)	(3)	(3)	(6)	(4)	(3)	(7)
<i>Subtotal Proposed Restaurant Trips</i>	<i>290</i>	<i>14</i>	<i>11</i>	<i>25</i>	<i>18</i>	<i>12</i>	<i>30</i>
Total Project Site Trips	853	22	46	68	45	27	72
Total Project Site Trips without Pass-By Trip Credit at Adjacent I/S	925	25	49	74	49	30	79
Less Existing Uses (Removed)							
7,500 sf Day Care Center (87 students)	381	37	33	70	33	37	70
Less 10% Pass-By Trips	(38)	(4)	(3)	(7)	(3)	(4)	(7)
<i>Subtotal Existing Day Care Trips</i>	<i>343</i>	<i>33</i>	<i>30</i>	<i>63</i>	<i>30</i>	<i>33</i>	<i>63</i>
5,000 sf Private Gym	165	4	3	7	13	9	22
Less 20% Pass-By Trips	(33)	(1)	0	(1)	(2)	(2)	(4)
<i>Subtotal Existing Private Gym Trips</i>	<i>132</i>	<i>3</i>	<i>3</i>	<i>6</i>	<i>11</i>	<i>7</i>	<i>18</i>
5,000 sf Retail (“West Coast Cycles”)	200	4	2	6	11	14	25
Less 10% Pass-By Trips	(20)	(1)	0	(1)	(1)	(2)	(3)
<i>Subtotal Existing Retail Trips</i>	<i>180</i>	<i>3</i>	<i>2</i>	<i>5</i>	<i>10</i>	<i>12</i>	<i>22</i>
Total Existing Site Trips	655	39	35	74	51	52	103
Total Existing Site Trips at Adjacent I/S	746	45	38	83	57	60	117
<i>Net New Site-Related Trips</i>	<i>198</i>	<i>(17)</i>	<i>11</i>	<i>(6)</i>	<i>(6)</i>	<i>(25)</i>	<i>(31)</i>
Net New Site-Related Trips at Adjacent I/S	179	(20)	11	(9)	(8)	(30)	(38)
<i>Note: sf: square feet</i>							
<i>Source: Hirsch/Green Transportation Consulting, Inc., 2015.</i>							

However, also per current LADOT policy, trip credits for pass-by activity are not applicable to the assessment of potential project-related impacts to intersections located immediately adjacent to or in close proximity of the Project Site. This policy affects the Project’s proposed restaurant component as well as each of the three existing on-site commercial uses, since as described previously, each of these components of the proposed and existing uses are assumed to exhibit some level of pass-by trip activity; note that the assumed “transit utilization” trip generation reduction factor associated with the proposed project’s residential component is not effected by the LADOT pass-by trip policies. Therefore, the trip generation estimates associated with the proposed restaurant component and existing on-site commercial uses were recalculated to remove the assumed pass-by trip adjustments. The results of these adjustments are also shown in Table III-30 (Project and Existing Site Uses Trip Generation Estimates), which indicates that the Project itself is expected to result in a total of approximately 925 trips per day, including 74 trips (25 inbound, 49 outbound) during the AM peak hour, and 79 trips (49

inbound, 30 outbound) during the PM peak hour, while the existing on-site uses currently generate approximately 746 total trips per day, including 83 trips (45 inbound, 38 outbound) during the AM peak hour, and 117 trips (57 inbound, 60 outbound) during the PM peak hour (applicable only to the “site-adjacent” or “site-proximate” intersections).

As a result, the Project is expected to result in a net increase in site-related trips of approximately 179 trips per day, including a reduction of nine trips (reduction of 20 inbound, increase of 11 outbound) during the AM peak hour, and a reduction of 38 trips (reductions of eight inbound and 30 outbound) during the PM peak hour. A comparison to the general net project-related trips to those for the “site-adjacent” intersections indicates that the removal of the pass-by trip reductions for the evaluation of the “site-adjacent” intersections actually results in a slight reduction in the amount of net traffic generated by the Project of approximately 19 fewer trips per day, including reductions of three trips during the AM peak hour and seven trips during the PM peak hour. These lower net trip generation numbers would act to reduce the potential for Project-related traffic impacts at the “site-adjacent” intersections compared to locations farther from the Project Site.

Therefore, regardless of whether or not the applicable LADOT pass-by trip reduction factors discussed previously for the existing and proposed commercial uses are assumed, as shown in Table III-30 (Project and Existing Site Uses Trip Generation Estimates), either condition results in the conclusion that the development of the Project, including the removal of several existing on-site uses and their associated trips, is anticipated to result in only a relatively nominal increase in daily trip generation at the site, and in fact, is expected to result in reductions in the amount of site-related traffic are also expected during both the AM and PM peak hours. As a result, the Project would not meet LADOT’s minimum trip generation thresholds for preparation of a detailed traffic impact study, and consequently, the Project is not required to prepare any such analyses. Further, since the development of the Project is actually expected to result in slight reductions in the overall amount of traffic on the streets and intersections surrounding the Project Site during the AM and PM peak hours (due to its anticipated reductions in site-related peak hour trips), it can also be reasonably concluded that the Project would not result in significant impacts to any of the intersections or streets in the Project vicinity (including the alley located along the southern border of the site) during either peak hour 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?

No Impact. To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, Proposition 111 enacted the Congestion Management Program (“CMP”) in 1990. The CMP is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the

Regional Transportation Improvement Program (RTIP) and State Transportation Improvement Program (STIP) processes. The CMP requires that a Traffic Impact Analysis (TIA) be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hours and all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours. Additionally, it requires a review of potential impacts to the regional transit system.

Arterial Monitoring Station Analysis

There are no CMP arterial monitoring intersections within the Project area. The Project, with a maximum peak hour trip generation of 179 trips, would not generate 50 or more peak hour trips at any intersections due to their distance from the Project Site. Therefore, no further analysis is required and no mitigation measures would be required.

Freeway Segment Analysis

There are no CMP freeway monitoring locations within the Project area. The Project, with a maximum peak hour trip generation of 179 trips, would not generate 150 or more peak hour trips at any freeway segments due to their distance from the Project Site. Therefore, no further analysis is required and no mitigation measures would be 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 a project only if it involved an aviation-related use or would influence changes to existing flight paths.

The Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin. Therefore, no impact would occur.

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)?

Potentially Significant Unless Mitigation Incorporated. 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.

Site Access***Construction***

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 minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians. The mitigation measure below includes access restrictions, covered sidewalks, and designating alternative pedestrian routes. Therefore, the traffic impacts associated with the construction activities would be less than significant.

Mitigation Measure**XVI-80 Pedestrian Safety**

- 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 or blockage, at all times.
- Temporary pedestrian facilities shall 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 shall be provided where pedestrians are exposed to potential injury from falling objects.
- 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.

Operation

The existing on-site retail and private gym facilities (located at the eastern end and in the middle of the Project Site, respectively) each currently provide only limited on-site parking for their employees and patrons, with a total (for both businesses) of approximately 14 spaces located along the north side of the existing east/west oriented alley bordering the Project Site along its south side; most of the patron parking for these two businesses typically uses the unmetered but time limited (one-hour) curbside parking located along Pico Boulevard in the project area. Conversely, the existing day care facility (at the western end of the Project Site) does not provide parking in the alley, but instead exhibits an approximately 23-space surface parking lot located along the west side of the building, with access to and from both Pico Boulevard and the alley. Access to and from the existing two-way alley is provided at both Bundy Drive on the west and Granville Avenue on the east, although the Bundy Drive access is limited to right-turn entry and right-turn exits only (from and to northbound Bundy Drive) due to the existing raised median on Bundy Drive south of Pico Boulevard, while “full” access (left-turn and right-turn entry and exit) is available at Granville Avenue, with further access to and from Pico Boulevard provided at the currently unsignalized intersection of Pico Boulevard and Granville Avenue.

It is also of note that, while the north side of the existing alley in the immediate Project vicinity (between Bundy Drive and Granville Avenue) is developed with a variety of commercial uses, most of which provide at least some limited employee and/or patron parking accessible from and adjacent to the alley, the south side of the alley is developed exclusively with single- and multi-family residential uses. All of these residences front along Ayres Avenue to the south, and as such, some of their parking occurs within on-site garages accessed from Ayres Avenue, or along Ayres Avenue itself. However, many of these residences also exhibit parking garages that directly access the alley, or provide access to the alley for other on-site parking areas. Therefore, the existing alley currently operates as two-way access facility to the parking areas at the rear of both the commercial and residential developments located along its length.

The Project anticipates that all access to and from its on-site parking would be provided via the alley, with 11 “commercial” (restaurant) parking spaces located on the first parking level, and a total of 129 residential-only parking spaces provided within the second and third levels of the parking garage and accessed via a single two-way driveway located near the western end of the Project Site; no vehicular access to any of the Project’s parking spaces would be located on or available from Pico Boulevard. Since the alley currently provides both commercial and residential access, the Project would not result in a substantial change from the existing operations of the alley. Furthermore, the development of the Project is expected to result in a reduction in site-related traffic during the critical AM and PM peak traffic hours. Although it is acknowledged that some of the traffic associated with the existing on-site uses does not use the alley to access site-related parking (instead using the on-street parking along Pico Boulevard), the nominal amount of incremental (additional) traffic associated with the proposed project

that is expected to use the alley (compared to the existing alley traffic levels) is not anticipated to result in any significant impacts to that facility, particularly during the critical AM and PM peak hours.

The proposed on-site (“internal”) vehicular circulation within the Project’s parking structure was also reviewed. All internal drive aisles provide adequate widths for two-way travel (minimum of approximately 23 feet clear width), and all internal turning radii and “end of aisle” vehicular turnaround areas are adequate to accommodate typical passenger vehicles. Further, the majority of the 127 vehicular parking spaces located in the Project’s garage are configured as direct-access spaces, with only 14 spaces (about 11 percent) configured as tandem parking (seven tandem “pairs”), thereby minimizing vehicular congestion within the parking structure. The Project’s parking garage layout and internal circulation scheme is typical of mixed-use developments throughout the region, and is expected to operate acceptably. As such, no significant on-site vehicular circulation impacts are anticipated.

Additionally, the Project would provide more than 80 feet of on-site vehicular queuing space between the edge of the alley travel way and the first internal (garage) parking space, which is nearly twice the distance necessary to provide the minimum on-site two-vehicle queue typically recommended by LADOT for developments such as the one proposed. Finally, the building would be set back approximately 17 feet from the centerline of the alley (about seven feet from the edge of the alley travel way), thus providing adequate and unobstructed visibility in both directions for vehicles exiting the garage. Therefore, no significant site access or visibility issues are anticipated. Impacts would be less than significant and no mitigation measures would be required.

e) Would the Project result in inadequate emergency access?

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve a Project Site or adjacent uses.

As previously discussed in Section 8(g), the Project is not located on or near an adopted emergency response or evacuation plan route. Emergency access to the Project Site would be provided by the existing and proposed street system. The Project would be designed and constructed in accordance with LAMC requirements to ensure proper emergency access.

As shown in Section 16(a) the Project is actually expected to result in slight reductions in the overall amount of traffic on the streets and intersections surrounding the Project Site during the AM and PM peak hours (due to its anticipated reductions in site-related peak hour trips). Therefore, the Project would not result in significant impacts to any of the intersections or streets in the Project vicinity. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Project’s proposed circulation plan and the above considerations, it is anticipated that the LAFD and

LAPD would be able to respond to on-site areas within the established response time. Furthermore, as described in Section 14(a), the Project would satisfy the emergency response requirements of the LAFD, and as discussed in Section 16(d), there are no hazardous design features included in the access design or site plan for the Project that could impede emergency access. The Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Impacts would be less than significant and no mitigation measures would be 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?

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Parking

Residential Component Vehicular Parking Requirements

The LAMC vehicular parking requirements for the residential uses are a minimum of 1.0 space per unit for “studio” or “efficiency” units (one habitable room), 1.5 spaces per unit for one-bedroom units (two habitable rooms), and 2.0 spaces per unit for two-bedroom or larger units (three or more habitable rooms). The LAMC does not specifically require that “guest parking” spaces be provided for residential apartment uses. However, as the Project would also include a total of approximately nine “affordable” units within the overall 100-unit residential component, the Project would be governed by the requirements of California Government Code Sections 65915(b)(1)(B) and 65915(c)(1), in lieu of the LAMC requirement. Therefore, the parking requirements for the Project’s entire residential component (including both the affordable and market-rate units) can be reduced to the following:

1. Upon the request of the developer, no city, county or city and county shall require a vehicular parking ratio, inclusive of handicapped and guest parking, of a development meeting the criteria of subdivision (b), that exceeds the following ratios:
 - (A) Zero to one bedrooms: one on-site parking space.
 - (B) Two to three bedrooms: two on-site parking spaces.
 - (C) Four and more bedrooms: two and one-half parking spaces.
2. If the total number of parking spaces required for a development is other than a whole number, the number shall be rounded up to the next whole number. For purposes of this subdivision, a

development may provide “onsite parking” through tandem parking or uncovered parking, but not through on-street parking.

3. This subdivision shall apply to a development that meets the requirements of subdivision (b) but only at the request of the applicant. An applicant may request additional parking incentives or concessions beyond those provided in this section, subject to subdivision (d).

Using these residential parking requirements, the Project’s residential component would require a total of 112 vehicle parking spaces, including 103 spaces for market-rate units and nine spaces for affordable units, as shown in Table III-31, Project Vehicular Parking.

Commercial Component Vehicular Parking Code Requirement

The LAMC vehicular parking ratios for commercial uses vary depending on the type of land use, with “small restaurants” (defined as restaurants with floor areas of less than 1,000 square feet), such as those envisioned for the Project, required to provide a minimum of 1.0 space per 200 square feet, or 5.0 parking spaces for each 1,000 square feet of gross floor area. Therefore, based on the applicable parking ratios, the Project’s proposed total of approximately 2,871 square feet of “small restaurant” uses (including a small outdoor dining patio) would require the provision of a total of 15 on-site vehicular parking spaces (before the allowable bicycle parking reduction), as shown in Table III-31, Project Vehicular Parking.

**Table III-31
Project Vehicular Parking**

Residential Use Parking			
Unit Type	Number of Units	Calculation per Government Code §§ 65915(b)(1)(B) & 65915(c)(1)	Required Number of Parking Spaces
0-1 bedrooms	88 ^a	88 x 1	88 spaces
2-3 bedrooms	12	12 x 2	24 spaces
Subtotal			112 spaces
15% Bicycle Parking Reduction – Transit Area (LAMC §12.21-A,4)			17 spaces
Total Required Residential			95 spaces
Total Provided Residential			118 spaces
Commercial Use Parking (LAMC §12.21-A,4(a)(4))			
Use	Square Footage	Required Parking Number of Spaces	
Restaurant, Small	2,871 square feet	15	
Subtotal			15 spaces
Bicycle Parking Reduction – Transit Area (LAMC §12.21-A,4)			30% = 4 spaces
Total Required Commercial			11 spaces
Total Provided Commercial			11 spaces
TOTAL PROJECT REQUIRED			106 spaces
TOTAL PROJECT PROVIDED			129 spaces
^a Includes 3 live/work, 49 studio, and 36 1-bedroom units Source: LAMC, KFA, 2015.			

Bicycle Parking Requirements

The Project's residential component is required to provide bicycle parking at a ratio of 1.0 long-term space per unit and 1.0 short-term space for every 10 units (0.10 space per unit), inclusive of both the market-rate and affordable residential units, and regardless of the unit size (or number of "habitable rooms" per unit). Based on these ratios, the Project would be required to provide a total of approximately 110 residential bicycle parking spaces, consisting of 100 long-term and 10 short-term spaces, as shown in Table III-32, Project Bicycle Parking.

The current LAMC requires that "small restaurants" (again, restaurants with floor areas of less than 1,000 square feet) such as those envisioned for the Project, provide a minimum of two long-term and two short-term bicycle parking spaces for each individual restaurant, independent of their actual size. As such, the Project's three small restaurants would require a combined total of 12 bicycle spaces, consisting of six long-term and 6 short-term spaces, as shown in Table III-32, Project Bicycle Parking.

**Table III-32
Project Bicycle Parking**

	Short-Term		Long-Term		Total	
	Required	Provided	Required	Provided	Required	Provided
Residential	10	10	100	100	110	110
Non-Residential						
Baseline Requirement	6	6	6	6	12	12
Parking Reduction ^a	4	78	0	0	4	78
PROJECT TOTAL	20	94	106	106	126	200
^a Inclusion of these spaces is required to support a total of 4 spaces auto parking reduction for the commercial use. Source: LAMC, KFA, 2015.						

Reductions from Vehicular Parking Code Requirements

The current LAMC includes provisions that allow for reductions in the number of required vehicular parking spaces for both commercial and residential developments, based on the number of bicycle spaces provided (the "bicycle parking reduction"). These provisions allow vehicular parking to be replaced by bicycle spaces at a ratio of four bicycle parking spaces for each vehicular parking space. Commercial uses are able to reduce their typical "baseline" vehicular parking requirements by up to 20%, while residential uses are allowed a reduction of up to 10%.

However, the LAMC also allows for additional reductions in vehicular parking requirements for both commercial and residential uses beyond the reduction for bicycle parking provided, based on proximity to key public transit facilities such as transit or bus stations or express ("Rapid") bus line stops (the "transit reduction"). Commercial uses located within 1,500 feet of such facilities or services are allowed to reduce their vehicular parking requirements by a total of up to 30%, while residential uses located within 1,500 feet of a transit or bus station or Rapid bus stop are allowed a maximum reduction in vehicular parking requirements of up to 15%. These maximum reductions in vehicular parking

requirements are again based on the provision of additional bicycle parking spaces at a ratio of 4 bicycle parking spaces for each replaced vehicular parking space. The Project Site is within 1,500 feet of the Rapid Bus (Rapid 7) stop located at Pico Boulevard and Bundy Drive, approximately 450 west of the site. Additionally, although the Project Site is slightly more than the typical one-quarter mile (1,320 feet) walking distance from the future Expo Line station near Olympic Boulevard and Bundy Drive, it is within a 1,500-foot radius of this soon-to-be-completed transit station. Therefore, the Project qualifies for the transit reduction of up to 30% of its commercial requirement, and up to 15% percent of its residential vehicular parking requirements, based on its provision of required (and/or additional) bicycle parking and proximity to transit.

Based on these LAMC provisions, the Project's restaurant component, which is required to provide a total of 12 bicycle spaces, is therefore allowed a reduction of three vehicular parking spaces from the otherwise required 15 vehicular spaces, resulting in a modified vehicular parking requirement of 12 spaces, which is equivalent to the maximum 20% reduction for commercial use (see Table III-31). The transit reduction would allow an additional 10% reduction (to the maximum 30% reduction) in the vehicular parking requirement, or 1 space, which would reduce the Project's total commercial use requirement to 11 spaces. In order to achieve this maximum allowable reduction, the Project must provide four additional bicycle parking spaces. The LAMC does not specify how such additional spaces are to be provided. For the Project, the four additional bicycle parking spaces would be provided as short-term spaces. As a result, incorporating the allowable maximum four space reduction in vehicular parking requirements for the Project's restaurant component results in a final modified "commercial" parking requirement of 11 vehicular parking spaces and 16 (six long-term and 10 short-term) bicycle spaces.

As noted, the Project qualifies for a maximum 15% reduction in the vehicular parking requirement for the residential use based on transit proximity. This would reduce the requirement by 17 spaces, to 95 spaces. Provision of 68 bicycle parking spaces would be required to support this reduction per LAMC. Since the Project is providing 110 residential bicycle parking spaces (total of long-term and short-term spaces), the transit reduction would be permitted without requiring the provision of additional bicycle spaces. Accordingly, the Project's residential use parking requirements would be 95 vehicular spaces, and 110 bicycle parking spaces (100 long term and 10 short term).

Incorporating all of the modifications described previously, the Project would be required to provide a total of 106 on-site vehicular parking spaces, including 95 residential and 11 restaurant spaces, plus a total of 126 on-site bicycle spaces, including 16 restaurant (six long-term and 10 short-term) and 110 residential (100 long-term and 10 short-term) spaces. The Project would provide a total of 129 on-site vehicular parking spaces, including 118 residential parking spaces and 11 restaurant spaces. The Project would also provide a total of 200 bicycle parking spaces, including 90 restaurant (six long-term and 84 short-term) and 110 residential (100 long-term and 10 short-term) spaces. Therefore, the Project would conform to or exceed the applicable vehicular and bicycle parking requirements (for both the individual

Project components, as well as for the Project in its entirety). As such, no significant off-site Project-related “spill over” parking impacts onto adjacent residential streets or into nearby commercial parking areas as a result of inadequate on-site parking supplies are anticipated and no mitigation measures would be required.

Transportation Plans

A review of the current public transit service within the general Project vicinity indicates that the Project Site itself is served by several bus lines operated by the Santa Monica Big Blue Bus, including Line 7, a local-stop line, and Rapid Line 7, a limited stop express line, both of which provide service directly to the Project Site along Pico Boulevard, and by Line 6, which runs along Pico Boulevard west of Bundy Drive and Bundy Drive south of Pico Boulevard, and Line 14, which travels through the Project vicinity along Bundy Drive/Centinela Avenue. Furthermore, the Project Site is located less than one-third mile from the Metro Expo Line station currently under construction near the intersection of Olympic Boulevard and Bundy Drive, which is scheduled for completion (along with the remainder of the Expo Line Phase II alignment) by the end of this year (2015). Although located slightly beyond the generally accepted “convenient” walking distance of one-quarter mile, it is also considered likely that residents of the Project would utilize the Expo Line, which when completed, would provide service between the coastal area of the City of Santa Monica and downtown Los Angeles.

Therefore, area-wide public transportation is currently available to residents 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 utilization in the Project vicinity can be heavy during the peak commute periods, this nominal level of new rider demand would not result in any significant transit-related impacts to the existing level of bus service in the area. Furthermore, the Project would not interfere with any class I or class II bikeway systems, as there are no there are no designated bikeway systems within the Project vicinity.⁵⁴ Since the Project would not modify or conflict with any alternative transportation policies, plans or programs, impacts would be less than significant and no mitigation measures would be required.

⁵⁴ *City of Los Angeles, Department of City Planning, Map D, Transportation Element of the General Plan, Non Motorized Transportation, April, 1997.*

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.

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 wastewater generated by the Project would be typical of residential and neighborhood commercial land uses. No industrial discharge into the wastewater system would occur. 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 at the Project Site would be treated according to the wastewater treatment requirements enforced by the Los Angeles RWQCB, and impacts would be less than significant and no mitigation measures would be 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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.

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 100 apartments and approximately 2,871 square feet of commercial space (containing three restaurants). Project water use has been calculated and is presented below in Table III-33 (Estimated Average Daily Water Consumption for the Proposed Project). As shown therein, the Project would consume a net total of approximately 12,537 gallons per day (gpd) or 0.038 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. Therefore, with respect to water treatment facilities, impacts would be less than significant and no mitigation measures are 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 III-33
Estimated Average Daily Water Consumption for the Proposed Project

Land Use	Size	Consumption Rate ^a	Total Consumption (gpd)
Existing Uses			
Commercial ^b	13,671 sf	60 / 1000 sf	820
Total Existing Water Consumption			820
Proposed Uses			
Multi-Family – Live/Work	3 du	90 gpd / unit	270
Multi-Family – Studio	49 du	90 gpd / unit	4,410
Multi-Family – 1 bedroom	36 du	132 gpd / unit	4,752
Multi-Family – 2 bedroom	12 du	180 gpd / unit	2,160
Restaurant	2,871 sf	360 gpd / 1000 sf	1,033
Gym	632 sf	240 gpd / 1000 sf	152
Open Community Area	9,668 sf	60 gpd / 1000 sf	580
Subtotal Water Consumption			1.13,357
<i>Less Existing Water Consumption</i>			<i>820</i>
Total Water Consumption			12,537
<i>Notes: gpd = gallons per day sf = square feet</i>			
<i>^a Based on 120% of rates provided by Ali Pootsi, Acting Division Manager, Wastewater Engineering Services Division, Los Angeles Bureau of Sanitation, in correspondence dated March 4, 2015 (provided in Appendix B).</i>			
<i>^b No water consumption was generated for the existing multi-family use as it is currently vacant.</i>			

With respect to water infrastructure, water service is provided to the Project Site by existing water mains maintained by the LADWP. Water lines in the project vicinity include a 12-inch cast iron main in Pico Boulevard, a six-inch steel pipe in the alleyway, and six-inch cast iron main in Granville Avenue, and a 12-inch cast iron main in Bundy Drive.⁵⁵ If water main or infrastructure upgrades are required, the Project applicant would pay for such upgrades, which would be constructed by either the applicant or 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, the Project would comply with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years.

⁵⁵ Correspondence from Amir Tabakh, Chief of Energy Efficiency Engineering, Los Angeles Department of Water and Power, April 27, 2015.

The LADWP's growth projections are based on conservation measures and adequate treatment capacity that is, or would be, available to treat the LADWP's projected water supply, as well as the LADWP's expected water sources. Compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code would serve to 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. All in all, the Project's water demand is expected to comprise a small percentage of LADWP's existing water supplies. Furthermore, the Project is not requesting a General Plan Amendment and therefore would utilize the projected amount of water planned for the Project Site.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 existing 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.⁵⁶ As previously discussed in Section II (Project Description), the Project would involve the construction of 100 apartments and approximately 2,871 square feet of commercial space (occupied by three restaurants). Wastewater generation has been calculated and is presented below in Table III-34 (Estimated Average Daily Wastewater Generation for the Proposed Project).

⁵⁶ City of Los Angeles Department of Public Works, *About Wastewater*, website: <http://www.lacitysan.org/wastewater/factsfigures.htm>, accessed March 17, 2015.

Table III-34
Estimated Average Daily Wastewater Generation for the Project

Land Use	Size	Generation Rate ^a	Total Generation (gpd)
Existing Uses			
Commercial ^b	13,671 sf	50 / 1000 sf	684
Total Existing Wastewater Generation			684
Proposed Uses			
Multi-Family – Live/Work	3 du	75 gpd / unit	225
Multi-Family – Studio	49 du	75 gpd / unit	3,675
Multi-Family – 1 bedroom	36 du	110 gpd / unit	3,960
Multi-Family – 2 bedroom	12 du	150 gpd / unit	1,800
Restaurant	2,871 sf	300 gpd / 1000 sf	861
Gym	632 sf	200 gpd / 1000 sf	126
Open Community Area	9,668 sf	50 gpd / 1000 sf	483
Subtotal Wastewater Generation			11,130
<i>Less Existing Wastewater Generation</i>			<i>684</i>
Total Wastewater Generation			10,446
<i>Notes: gpd = gallons per day sf = square feet</i>			
<i>^a Letter correspondence, City of Los Angeles, Department of Public Works, Bureau of Sanitation, Ali Poosti, Division Manager, March 20, 2014, See Appendix B to this Initial Study.</i>			
<i>^b No wastewater generation was generated for the existing multi-family use as it is currently vacant.</i>			

The Project would generate approximately 10,446 net gpd of wastewater. Therefore, the HTP would have adequate capacity to serve the Project. As such, with respect to the capacities of wastewater treatment facilities, impacts would be less than significant and no mitigation measures are required.

With respect to wastewater infrastructure, wastewater service is provided to the Project Site by existing sewer lines maintained by the Bureau of Sanitation. The wastewater infrastructure in the vicinity of the Project Site includes an 8-inch line on Bundy Drive (alley). The flow from the 8-inch line feeds into another 8-inch line on Pearl Place and continues into a 42-inch line on Barrington Avenue before discharging into a 60-inch sewer line on Regent Street. The City has determined that the estimated wastewater flow from the Project may have a significant impact on the sewer system capacity.⁵⁷ Therefore, detailed gauging is necessary to determine whether the existing sewer system is capable of safely accommodating the additional wastewater flow from the Project uses. As part of the typical building permit process, the City will require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City

⁵⁷ Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Division, City of Los Angeles Bureau of Sanitation Department of Public Works, March 4, 2015.

procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation, which would be a temporary action and would not result in any adverse environmental impacts. Therefore, impacts would be less than significant. No mitigation measures are required.

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 Section 8 (c), the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. 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 water which would exceed the capacity of existing or planned stormwater drainage systems and no impact would occur. Furthermore, no mitigation measures would be 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 Ten-Year Capital Improvement Program for the Fiscal Years 2010-2019 of the Water Services Organization (WSO) of the LADWP, is in a 10-year process of capital upgrades to the water infrastructure

system of the City. Through this program, the WSO can provide reliable sources of water to the residents of the City.⁵⁸

Sufficient water supplies are anticipated to be available to serve the Project from existing entitlements and resources, and new or expanded entitlements would not be necessary.⁵⁹ To ensure that the Project reduces its projected water demand to the extent feasible the Project will be required to comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- Weather-based irrigation controller with rain shutoff
- Matched precipitation (flow) rates for sprinkler heads
- Drip/microspray/subsurface irrigation where appropriate
- Minimum irrigation system distribution uniformity of 75 percent
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
- Use of landscape contouring to minimize precipitation runoff
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 sf. and greater.

⁵⁸ Los Angeles Department of Water and Power, *Water Services Organization, Ten-Year Capital Improvement Program for the Fiscal Years 2010-2019*, website: https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=AD17DWPWEB9173007219&RevisionSelectionMethod=LatestReleased, accessed: August 28, 2015.

⁵⁹ Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Division, City of Los Angeles Bureau of Sanitation Department of Public Works, March 4, 2015.

- 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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.

As stated in Section 17(b) of this Initial Study, the sewage flow from operation of the Project would ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Project.⁶⁰ Therefore, impacts would be less than significant.

- 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 (SRRE) or its updates, the Solid Waste Management Policy Plan (CiSWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

⁶⁰ *City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater: About Wastewater, Facts and Figures, website: www.ci.la.ca.us/SAN/wastewater/factsfigures.htm, accessed February 24, 2015.*

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. Most commonly, the City is serviced by the Sunshine Canyon Landfill. Sunshine accept residential, commercial, and construction waste. Solid waste from the Project area is transported for disposal to the Sunshine Canyon Landfill by private waste haulers. The capacity and estimated closure date for the landfills are included in Table III-35 (Landfill Capacity and Intake).

**Table III-35
Landfill Capacity and Intake**

Landfill Facility	Permitted Daily Intake (tons per day)^a	2009 Average Daily Intake (tons per day)^b	Estimated Remaining Permitted Capacity (as of 12/31/2009)^c (million tons)
Sunshine Canyon	12,100	7,543	96.8
<i>^{a, b, c} County Department of Public Works, Countywide Integrated Waste Management Plan 2009 Annual Report. Source (table): EcoTierra Consulting, February 2015.</i>			

Waste generated in the City may also be diverted from landfills and recycled. In 2000, the City had a rate of diversion of approximately 58.8 percent.⁶¹ The City is currently aiming to increase this rate to 70 percent by the year 2015.⁶² LABS' Solid Resources Citywide Recycling Division (SRCRD) develops and implements source reduction, recycling, and re-use programs in the City.⁶³ The SRCRD provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste (HHW), and helps create markets for recycled materials.⁶⁴ In order to help meet the diversion goals of AB 939 and the City of Los Angeles, the City adopted the Citywide Construction and Demolition (C&D) Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible

⁶¹ Los Angeles Bureau of Sanitation, AB 939 Year 2000 Report, pg. ES-1, August 2001, website: http://www.lacitysan.org/solid_resources/strategic_programs/ab939/, accessed: February 24, 2015.

⁶² LABS, Strategic Programs, website: http://www.lacitysan.org/solid_resources/factsfigures.htm, accessed: February 24, 2015.

⁶³ Los Angeles Bureau of Sanitation, Construction and Demolition Recycling Guide, website: http://www.lacitysan.org/solid_resources/recycling/c&d.htm, accessed: February 24, 2015.

⁶⁴ Los Angeles Bureau of Sanitation, Construction and Demolition Recycling Guide, website: http://www.lacitysan.org/solid_resources/recycling/c&d.htm, accessed: February 24, 2015.

for handling C&D waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation (BOS) prior to collecting, hauling and transporting C&D waste. It requires that all C&D waste generated within City limits be taken to City certified C&D waste processors, where the waste would be recycled to the extent feasible.

Implementation of the Project would generate construction and demolition waste. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Construction debris would consist primarily of debris from the demolition of 13,671 square feet of commercial and residential uses that would be disposed of as inert waste. Much of this material would be recycled and salvaged to the maximum extent feasible at a minimum of 75 percent diversion from the landfill. Solid waste would also be generated during the building construction phase of Project construction. Based on an average of 155 pounds of demolition debris per square foot of non-residential uses, 115 pounds of demolition debris per square foot of residential uses, 3.89 pounds of construction debris per square foot of non-residential construction, and 4.38 pounds of construction debris per square foot of residential construction that would need to be disposed of at an inert landfill,⁶⁵ demolition and construction of the Project would generate approximately 1,985 tons of construction debris. This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. As noted, the C&D waste is required to be delivered to City certified C&D waste processors where it would be recycled as feasible. Moreover, County of Los Angeles Countywide Integrated Management Plan 2009 Annual Report (the "2009 Annual Report") concludes that there is current capacity of 56 million tons available in the County for the disposal of inert waste.⁶⁶ Therefore, Project generated demolition and construction-related waste (i.e., asphalt and construction debris) would represent a very small percentage of the inert waste disposal capacity in the region. This constitutes 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.

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.

Operation of the Project would result in ongoing generation of solid waste and disposal of solid waste would be consistent with all federal, state, and local statutes and regulations regarding proper disposal.

⁶⁵ U.S. EPA, Report No. 530R98010, *Characterization of Building-Related Construction and Demolition Debris in the United States*, June 1998, page 2-3 and 2-4.

⁶⁶ 2009 Annual Report, page 27.

As shown in Table III-36 (Estimated Average Daily Solid Waste Generation for the Project), the Project would generate 346 pounds per day of solid waste.

This increase in solid waste per day is modest under either development scenario and would be handled by a local existing waste collection service. Additionally, the amount is minimal compared to daily capacities of nearby recycling or disposal facilities and transfer stations and these modest amounts would be further reduced through source reduction and recycling programs (as required by AB 939). Furthermore, the Project would not conflict with solid waste policies or objectives that are required by law, statute, or regulation. Thus, overall, impacts with regard to solid waste would be less than significant and no mitigation measures are required.

Cumulative Impacts

Water

In terms of the City's overall water supply condition, the water demands for any Project that is consistent with the City's General Plan has been taken into account in the adopted Urban Water Management Plan. In conjunction with The City of Los Angeles Water Supply Action Plan⁶⁷, the UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2050 under wet and dry year scenarios. Therefore, cumulative impacts to water supply would be less than significant and no mitigation measures would be required.

The remaining daily capacity of the LAAFP is between 50 and 150 mgd of water, depending on the season. Therefore, the LAAFP would have adequate capacity to the additional water demanded by the Project and other growth within the LADWP service area, and a less-than-significant cumulative impact would occur. In addition, 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. Therefore, no cumulative water infrastructure impacts are anticipated from the development of the Project and the related projects and no mitigation measures would be required.

⁶⁷ Los Angeles Department of Water and Power, 'Securing L.A.'s Water Supply' May 2008 website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-inourcommunity/a-ioc-goinggreen/a-ioc-gg-developingalocalwatersupply?_afrcWindowId=sl2t88mxt_30&_afrcLoop=30303913862000&_afrcWindowMode=0&_adf.ctrl-state=sl2t88mxt_33, accessed February 25, 2015.

Table III-36
Estimated Average Daily Solid Waste Generation for the Project

Land Use	Size	Generation Rate ^a	Total Generation (lbs/day)
Existing Uses			
Commercial ^b	13,671 sf	0.005 lbs / sf	68
Existing Solid Waste Generation			68
Proposed Uses			
Multi-Family – Live/Work	3	4 lbs / unit	12
Multi-Family – Studio	49 du	4 lbs / unit	196
Multi-Family – 1 bedroom	36 du	4 lbs / unit	144
Multi-Family – 2 bedroom	12 du	4 lbs / unit	48
Restaurant	2,871 sf	0.005 lbs / sf	14
Subtotal Solid Waste Generation			414
<i>Less Existing Solid Waste Generation</i>			<i>68</i>
Total Net Increase in Solid Waste Generation			346
Notes: gpd = gallons per day sf = square feet			
^a Cal Recycle, website: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm , February 25, 2015.			
^b No solid waste was generated for the existing multi-family use as it is currently vacant.			

Wastewater

Implementation of the Project and other development 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 (IRP) that shows that the HTP will be able to accommodate growth within its service area to the year 2030. With respect to local infrastructure, under the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The Applicants for each project will be required to submit a Sewer Capacity Availability Request (SCAR) to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project and other cumulative development projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project may be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable city and state water conservation programs and sewer allocation ordinances. Therefore, cumulative impacts on sewer service would be less than significant and no mitigation measures are required.

Solid Waste

Construction of the Project in combination with forecasted growth in the County through 2017 would generate construction and demolition waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to a City-certified construction and demolition waste processor, it is anticipated that future cumulative development would also implement similar measures to divert construction and demolition waste from landfills. Furthermore, as described above, the inert landfill does not face capacity issues and would be expected to have sufficient capacity to accommodate cumulative demand. Therefore, cumulative impacts on the unclassified landfill would be less than significant and no mitigation measures are required.

Operation of the Project in conjunction with forecasted growth in the County through 2017 would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The Countywide demand for landfill capacity is continually evaluated by the County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, 2012 Annual Report projects waste generation and available landfill capacity through 2027. Per the 2012 Annual Report, the forecasted 2017 waste generation volume for the County is approximately 23.5 million tons. The Annual Report assumes a 60 percent diversion rate, resulting in a disposal of 9.4 million tons in Class III Landfills and transformation facilities. Given the recent approval of the City's Exclusive Franchise System, which the City expects to start implementing in 2017, waste diversion from City sources will likely be higher than the assumed 60 percent (based on the City's current diversion rate of 72 percent). The estimated Project generation net increase of approximately 63.15 tons of waste per year would represent only a tiny fraction (approximately 0.000002 percent) of the cumulative waste generation in 2017. Thus, the Project's contribution to the County's estimated cumulative waste stream in the Project buildout year would not be considerable.

Furthermore, the Annual Report demonstrates that future disposal needs can be adequately met through the planning period (i.e., 2027) without disposal capacity shortages via a multi-pronged approach that includes successfully permitting and developing proposed in-County landfill expansions, utilizing available or planned out-of-County disposal capacity, developing necessary infrastructure to facilitate exportation of waste to out-of-County landfills, and developing conversion and other alternative technologies. Jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with Countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2012 Annual Report. Based on this trend, and because solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and

safety as well as the environment, it is reasonable to assume that concerted actions will continue to be taken by jurisdictions towards expanding and enhancing waste reduction and recycling programs, and implementing prudent solid waste management strategies in response to the strategies identified in the Annual Report. With respect to regulatory consistency, it is anticipated that, similar to the Project, the cumulative development projects would not conflict with, and instead would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, City's General Plan Framework Element, RENEW LA Plan, and Green LA Plan. Thus, overall, cumulative impacts with regard to solid waste would be less than significant and no mitigation measures are required.

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?**

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur only 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 densely populated urban 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.

- 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 Initial Study, a significant impact may occur if a project, in conjunction with other related 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 in this analysis, the Project's incremental contribution to cumulative impacts 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. As such, the Project's contribution to cumulative impacts would be less than significant.

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 Initial Study, a significant impact may occur if a 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 not result in significant adverse effects after implementation of mitigation measures.

IV. PREPARERS OF THE INITIAL STUDY AND PERSONS CONSULTED

Lead Agency

City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Project Applicant

ADC Real Estate Group, LTD.
27200 Agoura Road, Suite 201
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Jason J. Amoroso

Environmental Consultant

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Hazardous Materials Assessment Consultant

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Steve Kovach, Senior Author

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V. ACRONYMS & ABBREVIATIONS

AB	Assembly Bill
ARB	California Air Resources Board
ASTM	American Society for Testing Materials
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
APN	Assessor Parcel Number
bgs	Below ground surface
BID	Business Improvement District
BMPs	Best Management Practices
CAPCOA	California Air Pollution Control Officer's Association
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAT	Climate Action Team
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CH ₄	Methane
CMP	Congestion Management Program
CO ₂	Carbon Dioxide
CORTESE	California Hazardous Waste and Substances
cy	Cubic yards
dba	A-weighted decibel
du	Dwelling unit
EPA	Environmental Protection Agency (see also USEPA)
ESA	Environmental Site Assessment
FAR	Floor Area Ratio

gpd	Gallons per day
GFA	Gross floor area
GHG	Greenhouse gas
gpm	Gallons per minute
HFC	Hydrofluorocarbons
H ₂ O	Water Vapor
HTP	Hyperion Treatment Plant
IS	Initial Study
LACRA	City of Los Angeles Redevelopment Agency
LADRP	City of Los Angeles Department of Recreation and Parks
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
lbs	Pounds
LOS	Level of Service
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
mgd	Million gallons per day
MRZ-2	Mineral Resource Zone 2
MTA	Los Angeles County Metropolitan Transit Authority
NAHC	Native American Heritage Commission
N ₂ O	Nitrous Oxide
NPDES	National Pollution Discharge Elimination System
PFC	Perfluorocarbon
PSI	Pounds per square inch
RCPG	Regional Comprehensive Plan and Guide

RCRA	Resource Compensation and Recovery Act
RD	Reporting District
ROWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
sf	Square foot
SF ₆	Sulfur Hexafluoride
SOPA	Society of Professional Archaeologists
SRA	Source Receptor Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
T-FAR	Transfer of Floor Area
USEPA	United States Environmental Protection Agency (see also EPA)
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
V/C	Volume/capacity
VOC	Volatile Organic Compound

MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The City of Los Angeles Department of City Planning is the Lead Agency for the 11916 Pico Mixed-Use Project.

An Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, this environmental document identified project design features or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Project. This Mitigation Monitoring and Reporting Program (MMRP) is designed to monitor implementation of mitigation measures identified for the Project. The required mitigation measures are listed separately and categorized by impact area, with an accompanying identification of the following:

- Monitoring Phase, the phase of the project during which the mitigation measure shall be monitored;
 - Pre-Construction, including the design phase
 - Construction
 - Occupancy (Post-Construction)
- The Enforcement Agency, the agency with the authority to enforce the mitigation measure, and
- The Monitoring Agency, the agency to which reports involving feasibility, compliance, implementation and development are made.

The Project Applicant shall be obligated to provide certification prior to the issuance of site or building plans that the identified project design features have been included and compliance with the required mitigation measures has been achieved. All departments listed below are within the City of Los Angeles unless otherwise noted. The Project Applicant shall be responsible for implementing all project design features and mitigation measures unless otherwise noted.

AESTHETICS

I-120 Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

Monitoring Phase:	Occupancy
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

I-130 The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or

films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

Monitoring Phase: Pre-construction, Construction and Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AGRICULTURAL AND FOREST RESOURCES

No mitigation measures are required.

AIR QUALITY

No mitigation measures are required.

BIOLOGICAL RESOURCES

IV-90 Removal of trees in the public right-of-way requires approval by the Board of Public Works.

The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).

The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.

Trees shall be planted in the adjacent public right-of-way at a ratio of one tree for every thirty (30) feet of lot frontage or to the satisfaction of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Monitoring Phase: Pre-construction and Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works

CULTURAL RESOURCES

No mitigation measures are required.

GEOLOGY AND SOILS

VI-20 The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:

- a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
- b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.
- c. A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.
- d. "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.
- e. "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.
- f. Movement and removal of approved fencing shall not occur without prior approval by LADBS.

Monitoring Phase:	Pre-construction and Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

GREENHOUSE GAS EMISSIONS

VII-10 Green House Gas Emissions

- Only low- and non-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the Project.
- Any new construction shall include 20 percent of parking spaces set aside for EV ready parking.

Monitoring Phase:	Pre-Construction And Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

HAZARDS AND HAZARDOUS MATERIALS

No mitigation measures are required.

HYDROLOGY AND WATER QUALITY

No mitigation measures are required.

LAND USE PLANNING

XII-60 Increased Noise Levels (Mixed-Use Development)

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

Monitoring Phase:	Pre-Construction And Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

III-50 Installing and maintaining air filtration systems with efficiencies equal to or exceeding Minimum Efficiency Reporting Values (MERV) of 11 (MERV 11) as defined by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 (refer to Appendix D of the IS/MND).

Monitoring Phase:	Pre-Construction And Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

MINERAL RESOURCES

No mitigation measures are required.

NOISE

XII-20 Increased Noise Levels (Demolition, Grading and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- The project developer shall install a temporary noise control barrier around the construction site abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent multifamily residential structures with a goal of a reduction of 10 dBA. The barrier shall be a similar height to the abutting residential buildings. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and paving activities are complete.

Monitoring Phase:	Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

XII-40 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

Monitoring Phase:	Pre-Construction And Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

POPULATION AND HOUSING

No mitigation measures are required.

PUBLIC SERVICES

XIV-10 The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Monitoring Phase:	Pre-Construction
Enforcement Agency:	Los Angeles Fire Department
Monitoring Agency:	Los Angeles Fire Department

XIV-20 Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

Monitoring Phase:	Pre-Construction And Construction
Enforcement Agency:	Los Angeles Police Department
Monitoring Agency:	Department of Building and Safety

XIV-30 The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

Monitoring Phase:
Enforcement Agency:
Monitoring Agency:

Pre-Construction And Construction
 Los Angeles Police Department
 Department of Building and Safety

RECREATION

No mitigation measures are required.

TRANSPORTATION/TRAFFIC

XVI-80 Pedestrian Safety

- 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 or blockage, at all times.
- Temporary pedestrian facilities shall 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 shall be provided where pedestrians are exposed to potential injury from falling objects.
- 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

Monitoring Phase:
Enforcement Agency:
Monitoring Agency:

Pre-Construction And Construction
 Department of Building and Safety
 Department of Building and Safety

UTILITIES

No mitigation measures are required.

Exhibit C

Pro Forma

Property Summary

Cap Rate: 4.91%

Number of Units	100
Square Feet (Net)	63,159
Square Feet (Gross)	137,440

Operating Data

INCOME

Unit Description	%	Total Units	Unit SF-NRA	Total SF-NRA	Monthly SF-NRA	Monthly Per Unit	Monthly Total	Annual Total
Gross Potential Rent								
Studio	54.00%	54	475	25,650	4.63	2,200	118,800	1,425,600
Studio / BMR	5.00%	5	475	2,375	1.42	675	3,375	40,500
1 Bedroom	18.00%	18	700	12,600	3.86	2,700	48,600	583,200
1 Bedroom - L/W	3.00%	3	700	2,100	3.86	2,700	8,100	97,200
1 Bedroom - Den	4.00%	4	780	3,120	3.53	2,750	11,000	132,000
1 Bedroom / BMR	3.00%	3	700	2,100	0.96	675	2,025	24,300
2 Bedroom	12.00%	12	950	11,400	3.37	3,200	38,400	460,800
2 Bedroom / BMR	1.00%	1	950	950	0.71	675	675	8,100
Retail	0.00%		2,864	2,864	3.50	10,024	10,024	120,288
Total GPR	100%	100		63,159	\$ 3.66	\$ 2,410	\$ 240,999	\$ 2,891,988

Other Income

	% GPR				
Other Income	2.00%		0.08	48	4,820
Vacancy / Collection Loss	-4.00%		(0.16)	(98)	(9,833)
Total Other Income	-2.08%		\$ (0.08)	\$ (50)	\$ (5,013)

EFFECTIVE GROSS INCOME \$ 3.58 \$ 2,360 \$ 235,986 \$ 2,831,835

EXPENSES

Fixed

	% EGI	Per Unit				
Property Tax	15.86%	\$ 4,490	\$ 0.59	\$ 374	\$ 37,420	\$ 449,043
Insurance	2.65%	\$ 750	\$ 0.10	\$ 63	\$ 6,250	\$ 75,000
Total Fixed	18.51%	\$ 5,240	\$ 0.69	\$ 437	\$ 43,670	\$ 524,043

Variable

Payroll	7.42%	\$ 2,100	\$ 0.28	\$ 175	\$ 17,500	\$ 210,000
Marketing	0.71%	\$ 200	\$ 0.03	\$ 17	\$ 1,667	\$ 20,000
General & Administrative	1.41%	\$ 400	\$ 0.05	\$ 33	\$ 3,333	\$ 40,000
Management Fee	3.00%	\$ 813	\$ 0.11	\$ 68	\$ 6,779	\$ 81,346
Landscaping / Grounds	0.53%	\$ 150	\$ 0.02	\$ 13	\$ 1,250	\$ 15,000
Unit Turnover	0.88%	\$ 250	\$ 0.03	\$ 21	\$ 2,083	\$ 25,000
Repair & Maintenance	0.88%	\$ 250	\$ 0.03	\$ 21	\$ 2,083	\$ 25,000
Utilities	2.30%	\$ 650	\$ 0.09	\$ 54	\$ 5,417	\$ 65,000
Total Variable	17.13%	\$ 4,813	\$ 0.64	\$ 401	\$ 40,112	\$ 481,346

Reserves

	0.88%	\$ 250	\$ 0.03	\$ 22	\$ 2,083	\$ 25,000
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TOTAL EXPENSES 36.39% 10,304 \$ 1.36 \$ 859 \$ 85,866 \$ 1,030,389

NET OPERATING INCOME \$ 2.22 1,501 150,120 1,801,445

Loan Summary

Construction Loan Amount	65.0%	Loan to Cost Ratio	\$ 377	\$ 238,400	\$ 23,840,000
		Interest Rate	5.0%		
		Amortization	30		
		Payment		Monthly	Annual
				\$ 127,978	\$ 1,535,739

NET INCOME AFTER DEBT SERVICE 22,142 265,706

Cost Summary

			Per SF (Net)	Per SF (Gross)	Per Unit	Cost Budget
Acquisition - Land			\$ 161.5	\$ 74.2	\$ 101,994	\$ 10,199,443
Indirect - Entitlement Processing			\$ 2.4	\$ 1.1	\$ 1,500	\$ 150,000
Indirect - Architectural & Engineering			\$ 17.4	\$ 8.0	\$ 11,000	\$ 1,100,000
Indirect - Permits & Fees			\$ 16.7	\$ 7.7	\$ 10,543	\$ 1,054,324
Indirect - Insurance			\$ 4.7	\$ 2.2	\$ 3,000	\$ 300,000
Indirect - Property Tax			\$ 5.2	\$ 2.4	\$ 3,300	\$ 330,000
Indirect - Marketing / Interior Design / FF&E			\$ 11.0	\$ 5.1	\$ 6,950	\$ 695,000
Indirect - Security, Inspections, Other			\$ 3.9	\$ 1.8	\$ 2,450	\$ 245,000
Indirect - Administrative			\$ 1.5	\$ 0.7	\$ 925	\$ 92,500
Indirect - Development Fees			\$ 14.3	\$ 6.6	\$ 9,010	\$ 901,006
Indirect - Retail TI / Leasing			\$ 5.5	\$ 2.5	\$ 3,469	\$ 346,928
Indirect - Contingency	3.0%	Remaining Indirect	\$ 2.5	\$ 1.1	\$ 1,564	\$ 156,443
Direct - General Contractor (GMP Contract)			\$ 285.0	\$ 131.0	\$ 180,000	\$ 18,000,000
Direct - Contingency	5.0%	Total Direct	\$ 14.2	\$ 6.5	\$ 9,000	\$ 900,000
Finance - Add'l Holding Costs During Entitlements			\$ 9.5	\$ 4.4	\$ 6,000	\$ 600,000
Finance - Loan Costs & Title			\$ 5.4	\$ 2.5	\$ 3,384	\$ 338,400
Finance - Interest Reserve			\$ 20.1	\$ 9.3	\$ 12,715	\$ 1,271,467
TOTAL COST BUDGET			\$ 580.8	\$ 266.9	\$ 366,805	\$ 36,680,510

Exhibit D

Feasibility Analysis



700 South Flower Street, Suite 2730, Los Angeles, CA 90017
T: 310-581-0900 | F: 310-581-0910 | www.hraadvisors.com

February 29, 2016

Jason Amoroso
27200 Agoura Road
Suite 201
Calabasas, CA 91301

Re: 11916-11936 Pico Boulevard Project Financial Feasibility Analysis

Dear Mr. Amoroso:

Per your request, HR&A Advisors, Inc. (HR&A) has completed a financial feasibility analysis for three development programs you provided to us for a multi-family/retail development proposed by your company on a site at 11916-11936 Pico Boulevard in the City of Los Angeles ("City"). As we understand it, a density bonus is being requested from the City, including the use of "off-menu" incentives for relief from transitional height requirements, increased stories, and FAR increase. Based on the analysis summarized below, and supported by the calculation detail in Attachment A to this letter, we conclude that:

- **The development scenario with 42 market rate units, 9 affordable units and 7,683 square feet of retail, that achieves a 1.50 FAR, without a density bonus or other incentives would not be financially feasible.** This is because: (1) the return on total development cost falls below a minimum threshold for return on total development cost that we believe would be required to attract investment capital to the project (i.e., 4.8% vs. 5.7%); and (2) it yields a negative developer profit margin; and
- **The development scenario with 61 market rate units, 9 affordable units and 7,683 square feet of retail, only a 35% density bonus and on-menu height incentives that achieves a 2.0 FAR (with on-menu incentives) also would not be financially feasible.** This is because (1) while the additional building height achieved through an on-menu incentive, in combination with the density bonus, would permit a 56-foot tall building, which could typically accommodate five floors, but other City zoning regulations (i.e., limit on the number of allowable floors, transitional height and setback regulations) effectively limit development to only four floors, and thus this development scenario would only accommodate a total of 70 units; and (2) as a result, the return on total development cost again falls below the minimum threshold (i.e., 5.5% vs. 5.7%) and so does the minimum acceptable profit margin (i.e., 12.2% vs. 12.5%); and
- **Only the development scenario that achieves 91 market rate units 9 affordable units and 3,023 square feet of retail, using a combination of a 35% density bonus and on-menu height incentive, and off-menu incentives for additional allowable floors and FAR, waived transitional height requirements, and relaxed setback requirements, resulting in a 2.90 FAR development, would be financially feasible.** This is because it would produce a return on total development cost that is equal to the minimum threshold (i.e., 5.7% vs. 5.7%) and a developer profit margin that is greater than the minimum acceptable threshold (i.e., 15.8% vs. 12.5%).

The basis for the above conclusions is summarized below. Sources and notes for the assumptions used in these analyses are included with more detailed pro formas in Attachment A to this letter.

The 1.50 FAR, Three-Story Development Scenario

As shown in Table 1, for the 1.50 FAR development scenario, development costs total about \$22.7 million and Net Operating Income (NOI) totals about \$1.1 million. The resulting return on total development cost (i.e., NOI divided by total development cost) is 4.8 percent as compared with a minimum threshold of 5.7 percent. The minimum threshold was set at one percentage point more than the applicable income capitalization (or “cap”) rate (i.e., 4.7%) for new development at this location, to account for investment risk. The specified cap rate is based on HR&A’s analysis of sales since 2012 for larger multifamily apartment buildings within relevant submarkets proximate to the project site. After using that cap rate to estimate the value of this development at stabilized operation, and then deducting costs of sale and total development costs, the ratio of the resulting developer profit margin was compared with the net after-sale value, which produced a loss of approximately \$288,000. Therefore, this development scenario is not financially feasible.

Table 1: 1.50 FAR, Three-Story Development Scenario

	<u>Without Density Bonus</u>	
	<u>Per Unit</u>	<u>Total</u>
<u>Development Program</u>		
Land Area (sf)	539	27,493
Gross Building Area (GSF)	809	41,240
FAR (based on GSF)		1.5
Rentable Area - Residential (NSF)	532	27,112
Rentable Area - Commercial (NSF)		7,683
Building Efficiency		84.4%
Apartments		
Market Rate		42
Affordable		9
Total Units		51
Subterranean Parking		64
Levels		2
Structured Parking		11
Levels		1
Total Residential Parking		64
<u>Development Costs</u>		
		<u>Total</u>
Land Acquisition	\$	10,199,443
Hard Construction	\$	9,501,125
Soft Costs	\$	1,663,647
Financing Costs	\$	1,350,218
Total Development Cost (TDC)	\$	22,714,433
<u>Net Operating Income</u>		
	<u>Per NSF/Unit/Mo.</u>	<u>Annual</u>
Net Apartment Income	\$ 2.59	\$ 758,434
Net Commercial Income	\$ 3.60	\$ 322,619
Net Operating Income (NOI)	\$ 2.18	\$ 1,081,053
<u>Feasibility</u>		
Return on Cost (NOI / TDC)		4.8%
Feasible?		NO
(Minimum = Cap Rate + 1.00% = 5.7%)		
<i>Developer Profit Margin</i>		
Net Project Sale Value	\$	22,426,092
Less: Total Development Cost (from above)	\$	(22,714,433)
Developer Profit	\$	(288,340)
Developer Profit Margin		-1.3%
Feasible?		NO
(Minimum = 12.5%)		

The 2.0 FAR, Four-Story Development Scenario, with Density Bonus and On-Menu Height and FAR Incentives

As shown in Table 2, for the 2.0 FAR development scenario with on-menu FAR and height incentives, development costs total about \$26.6 million and Net Operating Income totals about \$1.5 million. The resulting return on total development cost is 5.5 percent, as compared with a minimum threshold of 5.7 percent and the ratio of developer profit to net after-sale value produces a profit margin of 12.2 percent, as compared with a minimum threshold of 12.5 percent, which in our experience is a typical return threshold for Los Angeles development projects. Therefore this development scenario is not financially feasible.

Table 2: 2.0 FAR, Four-Story Development Scenario, with Density Bonus and On-Menu Height and FAR Incentive

	With Density Bonus	
	<u>Per Unit</u>	<u>Total</u>
<u>Development Program</u>		
Land Area (sf)	393	27,493
Gross Building Area (GSF)	795	55,673
FAR (based on GSF)		2.0
Rentable Area - Residential (NSF)	532	37,240
Rentable Area - Commercial (NSF)		7,683
Building Efficiency		80.7%
Apartments		
Market Rate		61
Affordable		9
Total Units		70
Subterranean Parking		88
Levels		2
Structured Parking		11
Levels		1
Total Residential Parking		88
<u>Development Costs</u>		
		<u>Total</u>
Land Acquisition	\$	10,199,443
Hard Construction	\$	12,639,803
Soft Costs	\$	2,213,230
Financing Costs	\$	1,583,316
Total Development Cost (TDC)	\$	26,635,792
<u>Net Operating Income</u>		
	<u>Per NSF/Unit/Mo.</u>	<u>Annual</u>
Net Apartment Income	\$ 2.65	\$ 1,139,633
Net Commercial Income	\$ 3.60	\$ 322,619
Net Operating Income (NOI)	\$ 2.19	\$ 1,462,252
<u>Feasibility</u>		
Return on Cost (NOI / TDC)		5.5%
Feasible?		NO
(Minimum = Cap Rate + 1.00% = 5.7%)		
<i>Developer Profit Margin</i>		
Net Project Sale Value	\$	30,333,947
Less: Total Development Cost (from above)	\$	(26,635,792)
Developer Profit	\$	3,698,155
Developer Profit Margin		12.2%
Feasible?		NO
(Minimum = 12.5%)		

The Allowable 2.9 FAR, Five-Story Development Scenario, with Density Bonus and On-Menu Height Incentive, and Off-Menu Additional Allowable Floors Incentive, Transitional Height Requirement Waiver, FAR Increase, and Relaxed Setback Requirements¹

As shown in Table 3, for the 2.9 FAR development scenario with density bonus and on-menu height incentive, and off-menu additional allowable floor incentive, FAR increase (allowing a 2.9 to 1 FAR) transitional height requirement waiver and relaxed setback requirements, development costs total about \$31.7 million and Net Operating Income totals about \$1.8 million. The resulting return on total development cost of 5.7 percent is equal to the minimum threshold of 5.7 percent and the ratio of developer profit to net after-sale value produces a profit margin of 15.8 percent, which is greater than the minimum threshold of 12.5 percent. Therefore, this development scenario is financially feasible.

Table 3: Allowable 2.9 FAR, Five-Story Development Scenario, with Density Bonus and On-Menu Height Incentive, and Off-Menu Additional Allowable Floors Incentive, Transitional Height Requirement Waiver, FAR Increase, and Relaxed Setback Requirements

	<u>With Density Bonus</u>	
	<u>Per Unit</u>	<u>Total</u>
<u>Development Program</u>		
Land Area (sf)	275	27,493
Gross Building Area (GSF)	762	76,247
FAR (based on GSF)		2.8
Rentable Area - Residential (NSF)	569	56,901
Rentable Area - Commercial (NSF)		3,023
Building Efficiency		78.6%
Apartments		
Market Rate		
Affordable		9
Total Units		100
Subterranean Parking		113
Levels		2
Structured Parking		11
Levels		1
Total Residential Parking		113
<u>Development Costs</u>		
		<u>Total</u>
Land Acquisition	\$	10,199,443
Hard Construction	\$	16,731,815
Soft Costs	\$	2,929,741
Financing Costs	\$	1,887,215
Total Development Cost (TDC)		\$ 31,748,214
<u>Net Operating Income</u>		
	<u>Per NSF/Unit/Mo.</u>	<u>Annual</u>
Net Apartment Income	\$ 2.57	\$ 1,691,192
Net Commercial Income	\$ 3.60	\$ 126,940
Net Operating Income (NOI)	\$ 1.99	\$ 1,818,131
<u>Feasibility</u>		
Return on Cost (NOI / TDC)		5.7%
Feasible?		YES
(Minimum = Cap Rate + 1.00% = 5.7%)		
<i>Developer Profit Margin</i>		
Net Project Sale Value	\$	37,716,556
Less: Total Development Cost (from above)		\$ (31,748,214)
Developer Profit	\$	5,968,342
Developer Profit Margin		15.8%
Feasible?		YES
(Minimum = 12.5%)		

¹ HR&A's assumption for gross square footage, and thus FAR, differ slightly from the Project's entitlements application based on discussions with the project's architect.

Jason Amoroso
February 29, 2016

The details of our analysis of project feasibility under all three of these development scenarios are included in Attachment A to this memo. The Project architect provided us the basic development program for all three scenarios and Jason Amoroso's entitlement team provided us the land cost. We used the development programs and independently verified the land cost (based on a closing statement dated April 6, 2015), then applied our own independent calculations of development costs, net operating income and investment returns. In doing so, we relied on generally accepted third party data sources (sources for all assumptions are included in Attachment A) and our own expertise. HR&A is a national economic development, real estate advisory and public policy consulting firm. We have extensive experience analyzing the financial feasibility of many different kinds of development products and planning initiatives, including considerable experience in the Los Angeles metro area. Our clients include a wide range of private and public sector organizations, including various departments of the City of Los Angeles. More information about HR&A is available at our Web site: www.hraadvisors.com.

Please contact me if you or the City of Los Angeles Department of City Planning has any questions about our analysis and conclusions.

Sincerely,



Paul J. Silvern
Vice President

Attachment A: 11916-11936 Pico Boulevard Financial Feasibility Analysis Without and With Proposed Density Bonus

Attachment A
11916 West Pico Boulevard
Financial Feasibility, Without Density Bonus, 1.5 FAR Development Scenario

	Without Density Bonus	
	<u>Per Unit</u>	<u>Total</u>
Development Program¹		
Land Area (sf)	539	27,493
Gross Building Area (GSF)	809	41,240
Achieved FAR (based on GSF)		1.5
Rentable Area - Residential (NSF)	532	27,112
Rentable Area - Commercial (NSF)		7,683
Building Efficiency		84.4%
Apartments		
Market Rate		42
Affordable		9
Total Units		51
Subterranean Parking²		
Levels		67
		1.5
Structured Parking²		
Levels		11
		1
Total Residential Parking	1.3	64

Unit Mix¹	<u>Number</u>	<u>Net Rentable</u>		<u>Mo.</u>		<u>Total Mo. Rent</u>
		<u>SF</u>	<u>Rent/NRSF</u>	<u>Mo. Rent</u>		
Market Rate³						
Studio	26	446	\$4.75	\$2,119	\$	55,081
1 Bedroom	11	595	\$4.00	\$2,380	\$	26,180
2 Bedroom	5	826	\$3.50	\$2,891	\$	14,455
	42				\$	95,716
Affordable⁴						
Studio	5	446	\$1.04	\$463	\$	2,315
1 Bedroom	3	595	\$0.87	\$520	\$	1,560
2 Bedroom	1	826	\$0.70	\$576	\$	576
	9				\$	4,451

Land	<u>Per Land</u>		<u>Total</u>
	<u>SF</u>	<u>Per Unit</u>	
Land Acquisition ⁵	\$ 370.98	\$ 199,989	\$ 10,199,443
Subtotal Land	\$ 370.98	\$ 199,989	\$ 10,199,443

Construction	<u>Per Bldg.</u>		<u>Total</u>
	<u>GSF</u>	<u>Per Unit/Space</u>	
Hard Construction-Buildings ⁶	\$ 146	\$ 118,060	\$ 6,021,040
Hard Construction-Structured Parking (per space) ⁶		\$ 26,500	\$ 291,500
Hard Construction-Subt. Parking (per space) ⁶		\$ 36,750	\$ 2,352,000
Tenant Improvements Allowance (x Retail NSF) ⁷	\$50	\$ 9	\$ 384,150
Hard Cost Contingency (x Subtotal) ⁶	5%	\$ 11	\$ 452,435
Subtotal Construction ⁶	\$ 230	\$ 186,297	\$ 9,501,125

Soft Costs⁷				
Design, Engineering & Consulting Services (x Hard Costs)	6.0%	\$ 13.82	\$ 11,178	\$ 570,067
Permits & Fees (x Hard Costs)	4.0%	\$ 9.22	\$ 7,452	\$ 380,045
Taxes, Insurance, Legal & Accounting (x Hard Costs)	3.0%	\$ 6.91	\$ 5,589	\$ 285,034
Development Management (x Hard Costs)	4.0%	\$ 9.22	\$ 7,452	\$ 380,045
Soft Cost Contingency (x Subtotal) ⁶	3.0%	\$ 1.17	\$ 950	\$ 48,456
Subtotal Soft Costs	20.0%	\$ 40.34	\$ 32,621	\$ 1,663,647

Construction Financing Costs⁷	<u>Per GSF</u>		<u>Per Unit</u>		<u>Total</u>
Land + Hard Costs + Soft Costs	\$ 21,364,214				
Loan to Cost Ratio	80%				
Construction Loan Principal	\$ 17,091,371				
Loan Fees (%)	1.5%	\$ 6.22	\$ 5,027	\$	256,371
Interest Rate	6.00%				
Outstanding Principal Balance	60%				
Term (years)	2				
Construction Period (months)	18				
Construction Loan Interest		\$ 22.38	\$ 18,097	\$	922,934
Permanent Loan Points	1.0%	\$ 4.14	\$ 3,351	\$	170,914
Subtotal Construction Loan		\$ 32.74	\$ 26,475	\$	1,350,218
Total Development Cost (TDC)		\$ 550.79	\$ 445,381	\$	22,714,433

Net Operating Income	<u>Per</u>	<u>Per</u>	<u>Annual</u>
	Unit/Mo.	NSF/Unit/Mo.	
Gross Apartment Rental Income			
Market Rate Apartments ³	\$ 2,279	\$ 4.30	\$ 1,148,592
Affordable Apartments (Low Income) ⁴	\$ 495	\$ 0.92	\$ 53,412
Miscellaneous Revenue ⁷	\$ 30	\$ 0.06	\$ 18,360
Gross Income	\$ 1,994	\$ 3.75	\$ 1,220,364
Less: Vacancy Allowance ⁷	7.0%	\$ (0.01)	\$ (85,425)
Effective Gross Income (EGI)	\$ 1,825	\$ 3.75	\$ 1,134,939
Less: Annual Operating Expenses (x EGI) ⁷	32.5%	\$ (1.13)	\$ (368,855)
Less: Replacement Reserve (per unit/year) ⁷	\$150	\$ (0.02)	\$ (7,650)
Net Apartment Income	\$ 1,209	\$ 2.59	\$ 758,434
		<u>Per NSF/Mo</u>	<u>Annual</u>
Gross Retail Rental Income (NNN) ³		\$ 3.90	\$ 359,564
Less: Vacancy Allowance (x Gross Income) ⁷	7.5%	\$ (0.29)	\$ (26,967)
Effective Gross Income (EGI)		\$ 3.61	\$ 332,597
Less: Management Fee (x EGI) ⁷	3%	\$ (0.11)	\$ (9,978)
Net Commercial Income		\$ 3.50	\$ 322,619
Net Operating Income (NOI)		\$ 2.18	\$ 1,081,053

Feasibility

Return on Total Development Cost			
Net Operating Income (from above)			\$ 1,081,053
Total Development Cost (from above)			\$ 22,714,433
Return on Cost (NOI / TDC)			4.8%

Feasible?

(Minimum = Cap Rate + 1.00% = 5.7%)⁷

Developer Profit Margin			
Net Operating Income (from above)			\$ 1,081,053
Cap Rate ⁸	4.7%		
Project Value (NOI x Cap Rate)			\$ 23,001,120
Less: Cost of Sale ⁷	2.5%		\$ (575,028)
Net Project Sale Value			\$ 22,426,092
Less: Total Development Cost (from above)			\$ (22,714,433)
Developer Profit Margin			\$ (288,340)
% x Net Project Sale Value			-1.3%

Feasible?

(Minimum = 12.5%)⁷

SOURCES & NOTES:

¹ Amoroso Companies.

² Bicycle spaces are factored into total parking spaces.

³ HR&A, based on review of market comps for newer, similarly-scaled apartment buildings in and near West Los Angeles.

net of utility allowances, per Housing Authority of the City of Los Angeles.

⁴ LA Housing & Community Investment Dept. affordable rent schedule for Density Bonus program (Schedule VI), August 1, 2015.

⁵ Amoroso Companies; verified by closing statement dated April 6, 2015.

⁶ HR&A estimate of weighted retail and residential costs based on Marshall & Swift Cost Estimator software, January 2016 data for LA area. Includes demolition, and site work, factored to remove soft costs listed separately.

⁷ HR&A assumptions typical for this type of project and/or calculations.

⁸ Based on HR&A review of third party data sources (e.g., CoStar data for sale of similar buildings within relevant, proximate submarkets since 2012.)

Prepared by: HR&A Advisors, Inc.

Attachment A

11916 West Pico Boulevard

Financial Feasibility, With Density Bonus and On-Menu Height Incentive, 2.0 FAR Development Scenario

	<u>With Density Bonus</u>	
	<u>Per Unit</u>	<u>Total</u>
Development Program¹		
Land Area (sf)	393	27,493
Gross Building Area (GSF)	795	55,673
Achieved FAR (based on GSF)		2.0
Rentable Area - Residential (NSF)	532	37,240
Rentable Area - Commercial (NSF)		7,683
Building Efficiency		80.7%
Apartments		
Market Rate		61
Affordable		9
Total Units		70
Subterranean Parking ²		92
Levels		1.5
Structured Parking ²		11
Levels		1
Total Residential Parking	1.3	88

<u>Unit Mix¹</u>	<u>Number</u>	<u>Net Rentable</u>		<u>Mo.</u>	
		<u>SF</u>	<u>Rent/NRSF</u>	<u>Mo. Rent</u>	<u>Total Mo. Rent</u>
Market Rate³					
Studio	37	446	\$4.75	\$2,119	\$ 78,385
1 Bedroom	17	595	\$4.00	\$2,380	\$ 40,460
2 Bedroom	7	826	\$3.50	\$2,891	\$ 20,237
	61				\$ 139,082
Affordable⁴					
Studio	5	446	\$1.04	\$463	\$ 2,315
1 Bedroom	3	595	\$0.87	\$520	\$ 1,560
2 Bedroom	1	826	\$0.70	\$576	\$ 576
	9				\$ 4,451

	<u>Per Land</u>		<u>Total</u>
	<u>SF</u>	<u>Per Unit</u>	
Land			
Land Acquisition ⁵	\$ 370.98	\$ 145,706	\$ 10,199,443
Subtotal Land	\$ 370.98	\$ 145,706	\$ 10,199,443

	<u>Per Bldg.</u>		<u>Total</u>
	<u>GSF</u>	<u>Per Unit/Space</u>	
Construction			
Hard Construction-Buildings ⁶	\$ 146	\$ 116,118	\$ 8,128,258
Hard Construction-Structured Parking (per space) ⁶		\$ 26,500	\$ 291,500
Hard Construction-Subt. Parking (per space) ⁶		\$ 36,750	\$ 3,234,000
Tenant Improvements Allowance (x Retail NSF) ⁷	\$50	\$ 7	\$ 384,150
Hard Cost Contingency (x Subtotal) ⁶	5%	\$ 11	\$ 8,599
Subtotal Construction⁶	\$ 227	\$ 180,569	\$ 12,639,803

Soft Costs⁷					
Design, Engineering & Consulting Services (x Hard Costs)	6.0%	\$ 13.62	\$ 10,834	\$ 758,388	
Permits & Fees (x Hard Costs)	4.0%	\$ 9.08	\$ 7,223	\$ 505,592	
Taxes, Insurance, Legal & Accounting (x Hard Costs)	3.0%	\$ 6.81	\$ 5,417	\$ 379,194	
Development Management (x Hard Costs)	4.0%	\$ 9.08	\$ 7,223	\$ 505,592	
Soft Cost Contingency (x Subtotal) ⁶	3.0%	\$ 1.16	\$ 921	\$ 64,463	
Subtotal Soft Costs	20.0%	\$ 39.75	\$ 31,618	\$ 2,213,230	

	<u>Per GSF</u>		<u>Per Unit</u>		<u>Total</u>
Construction Financing Costs⁷					
Land + Hard Costs + Soft Costs	\$ 25,052,476				
Loan to Cost Ratio	80%				
Construction Loan Principal	\$ 20,041,981				
Loan Fees (%)	1.5%	\$ 5.40	\$ 4,295	\$ 300,630	
Interest Rate	6.00%				
Outstanding Principal Balance	60%				
Term (years)	2				
Construction Period (months)	18				
Construction Loan Interest		\$ 19.44	\$ 15,461	\$ 1,082,267	
Permanent Loan Points	1.0%	\$ 3.60	\$ 2,863	\$ 200,420	
Subtotal Construction Loan		\$ 28.44	\$ 22,619	\$ 1,583,316	
Total Development Cost (TDC)		\$ 478.43	\$ 380,511	\$ 26,635,792	

	<u>Per</u>	<u>Per</u>	<u>Annual</u>
	<u>Unit/Mo.</u>	<u>NSF/Unit/Mo.</u>	
Net Operating Income			
Gross Apartment Rental Income			
Market Rate Apartments ³	\$ 2,280	\$ 4.29	\$ 1,668,978
Affordable Apartments (Low Income) ⁴	\$ 495	\$ 0.92	\$ 53,412
Miscellaneous Revenue ⁷	\$ 30	\$ 0.06	\$ 25,200
Gross Income	\$ 2,080	\$ 3.91	\$ 1,747,590
Less: Vacancy Allowance ⁷	2.5% \$ (60)	\$ (0.00)	\$ (43,690)
Effective Gross Income (EGI)	\$ 2,021	\$ 3.91	\$ 1,703,900
Less: Annual Operating Expenses (x EGI) ⁷	32.5% \$ (659)	\$ (1.24)	\$ (553,768)
Less: Replacement Reserve (per unit/year) ⁷	\$150 \$ (13)	\$ (0.02)	\$ (10,500)
Net Apartment Income	\$ 1,349	\$ 2.65	\$ 1,139,633
		<u>Per NSF//Mo</u>	<u>Annual</u>
Gross Retail Rental Income (NNN) ³		\$ 3.90	\$ 359,564
Less: Vacancy Allowance (x Gross Income) ⁷	7.5%	\$ (0.29)	\$ (26,967)
Effective Gross Income (EGI)		\$ 3.61	\$ 332,597
Less: Management Fee (x EGI) ⁷	3%	\$ (0.11)	\$ (9,978)
Net Commercial Income		\$ 3.50	\$ 322,619
Net Operating Income (NOI)		\$ 2.19	\$ 1,462,252

Feasibility

Return on Total Development Cost			
Net Operating Income (from above)			\$ 1,462,252
Total Development Cost (from above)			\$ 26,635,792
Return on Cost (NOI / TDC)			5.5%

Feasible?

(Minimum = Cap Rate + 1.00% = 5.7%)⁷

Developer Profit Margin			
Net Operating Income (from above)			\$ 1,462,252
Cap Rate ⁸	4.7%		
Project Value (NOI x Cap Rate)			\$ 31,111,741
Less: Cost of Sale ⁷	2.5%		\$ (777,794)
Net Project Sale Value			\$ 30,333,947
Less: Total Development Cost (from above)			\$ (26,635,792)
Developer Profit Margin			\$ 3,698,155
% x Net Project Sale Value			12.2%

Feasible?

(Minimum = 12.5%)⁷

SOURCES & NOTES:

¹ Amoroso Companies.

² Bicycle spaces are factored into total parking spaces.

³ HR&A, based on review of market comps for newer, similarly-scaled apartment buildings in and near West Los Angeles.

⁴ LA Housing & Community Investment Dept. affordable rent schedule for Density Bonus program (Schedule VI), August 1, 2015, net of utility allowances, per Housing Authority of the City of Los Angeles.

⁵ Amoroso Companies; verified by closing statement dated April 6, 2015.

⁶ HR&A estimate of weighted retail and residential costs based on Marshall & Swift Cost Estimator software, January 2016 data for LA area. Includes demolition, and site work; factored to remove soft costs listed separately.

⁷ HR&A assumptions typical for this type of project and/or calculations.

⁸ Based on HR&A review of third party data sources (e.g., CoStar data for sale of similar buildings within relevant, proximate submarkets since 2012.)

Prepared by: HR&A Advisors, Inc.

Attachment A

11916 West Pico Boulevard

Financial Feasibility, With Density Bonus and On-Menu Height Incentive, 2.9 FAR Development Scenario with Off-Menu Height Incentive, Transitional Height Requirement Waiver, and Relaxed Setback Requirements

	With Density Bonus	
	Per Unit	Total
Development Program¹		
Land Area (sf)	275	27,493
Gross Building Area (GSF) ²	762	76,247
Achieved FAR (based on GSF)		2.8
Rentable Area - Residential (NSF)	569	56,901
Rentable Area - Commercial (NSF)		3,023
Building Efficiency		78.6%
Apartments		
Market Rate		91
Affordable		9
Total Units		100
Subterranean Parking ³		118
Levels		2
Structured Parking ³		12
Levels		1
Total Residential Parking	1.1	113

	Number	Net Rentable	Mo.	Mo. Rent	Total Mo. Rent
		SF	Rent/NRSF		
Unit Mix¹					
<i>Market Rate⁴</i>					
Studio	54	446	\$4.75	\$2,119	\$ 114,399
1 Bedroom	25	595	\$4.00	\$2,380	\$ 59,500
2 Bedroom	12	826	\$3.50	\$2,891	\$ 34,692
	91				\$ 208,591
<i>Affordable⁵</i>					
Studio	5	446	\$1.04	\$463	\$ 2,315
1 Bedroom	3	595	\$0.87	\$520	\$ 1,560
2 Bedroom	1	826	\$0.70	\$576	\$ 576
	9				\$ 4,451

	Per Land		Per Unit	Total
	SF			
Land				
Land Acquisition ⁶	\$ 370.98	\$ 101,994	\$	\$ 10,199,443
Subtotal Land	\$ 370.98	\$ 101,994	\$	\$ 10,199,443

	Per Bldg.		Per Unit/Space	Total
	GSF			
Construction				
Hard Construction-Buildings ⁷	\$ 146	\$ 111,321	\$	\$ 11,132,062
Hard Construction-Structured Parking (per space) ⁷		\$ 26,500	\$	\$ 315,350
Hard Construction-Subt. Parking (per space) ⁷		\$ 36,750	\$	\$ 4,336,500
Tenant Improvements Allowance (x Retail NSF) ⁸	\$50	\$ 2	\$	\$ 151,150
Hard Cost Contingency (x Subtotal) ⁷	5%	\$ 10	\$ 7,968	\$ 796,753
Subtotal Construction ⁷	\$ 219	\$ 167,318	\$	\$ 16,731,815

Soft Costs⁸				
Design, Engineering & Consulting Services (x Hard Costs)	6.0%	\$ 13.17	\$ 10,039	\$ 1,003,909
Permits & Fees (x Hard Costs)	4.0%	\$ 8.78	\$ 6,693	\$ 669,273
Taxes, Insurance, Legal & Accounting (x Hard Costs)	3.0%	\$ 6.58	\$ 5,020	\$ 501,954
Development Management (x Hard Costs)	4.0%	\$ 8.78	\$ 6,693	\$ 669,273
Soft Cost Contingency (x Subtotal) ⁷	3.0%	\$ 1.12	\$ 853	\$ 85,332
Subtotal Soft Costs	20.0%	\$ 38.42	\$ 29,297	\$ 2,929,741

	Per GSF		Per Unit	Total
Construction Financing Costs⁸				
Land + Hard Costs + Soft Costs	\$ 29,860,999			
Loan to Cost Ratio	80%			
Construction Loan Principal	\$ 23,888,799			
Loan Fees (%)	1.5%	\$ 4.70	\$ 3,583	\$ 358,332
Interest Rate	6.00%			
Outstanding Principal Balance	60%			
Term (years)	2			
Construction Period (months)	18			
Construction Loan Interest		\$ 16.92	\$ 12,900	\$ 1,289,995
Permanent Loan Points	1.0%	\$ 3.13	\$ 2,389	\$ 238,888
Subtotal Construction Loan		\$ 24.75	\$ 18,872	\$ 1,887,215
Total Development Cost (TDC)		\$ 416.39	\$ 317,482	\$ 31,748,214

Net Operating Income	<u>Per</u>	<u>Per</u>	<u>Annual</u>
	<u>Unit/Mo.</u>	<u>NSF/Unit/Mo.</u>	
Gross Apartment Rental Income			
Market Rate Apartments ⁴	\$ 2,292	\$ 4.27	\$ 2,503,092
Affordable Apartments (Low Income) ⁵	\$ 495	\$ 0.55	\$ 53,412
Miscellaneous Revenue ⁸	\$ 30	\$ 0.05	\$ 36,000
Gross Income	\$ 2,160	\$ 3.80	\$ 2,592,504
Less: Vacancy Allowance ⁸	2.5% \$ (59)	\$ (0.00)	\$ (64,813)
Effective Gross Income (EGI)	\$ 2,101	\$ 3.80	\$ 2,527,691
Less: Annual Operating Expenses (x EGI) ⁸	32.5% \$ (685)	\$ (1.20)	\$ (821,500)
Less: Replacement Reserve (per unit/year) ⁸	\$150 \$ (13)	\$ (0.02)	\$ (15,000)
Net Apartment Income	\$ 1,404	\$ 2.57	\$ 1,691,192
		<u>Per NSF/Mo</u>	<u>Annual</u>
Gross Retail Rental Income (NNN) ⁴		\$ 3.90	\$ 141,476
Less: Vacancy Allowance (x Gross Income) ⁸	7.5%	\$ (0.29)	\$ (10,611)
Effective Gross Income (EGI)		\$ 3.61	\$ 130,866
Less: Management Fee (x EGI) ⁸	3%	\$ (0.11)	\$ (3,926)
Net Commercial Income		\$ 3.50	\$ 126,940
Net Operating Income (NOI)		\$ 1.99	\$ 1,818,131

Feasibility

Return on Total Development Cost			
Net Operating Income (from above)			\$ 1,818,131
Total Development Cost (from above)			\$ 31,748,214
Return on Cost (NOI / TDC)			5.7%
Feasible?			YES

(Minimum = Cap Rate + 1.00% = 5.7%)⁸

Developer Profit Margin			
Net Operating Income (from above)			\$ 1,818,131
Cap Rate ⁹	4.7%		
Project Value (NOI x Cap Rate)			\$ 38,683,647
Less: Cost of Sale ⁸	2.5%		\$ (967,091)
Net Project Sale Value			\$ 37,716,556
Less: Total Development Cost (from above)			\$ (31,748,214)
Developer Profit Margin			\$ 5,968,342
% x Net Project Sale Value			15.8%
Feasible?			YES

(Minimum = 12.5%)⁸

SOURCES & NOTES:

¹ Amoroso Companies.

² HR&A's assumption for gross square footage, and thus FAR, differ slightly from the Project's entitlements application based on discussions with the project's architect.

³ Bicycle spaces are factored into total parking spaces.

⁴ HR&A, based on review of market comps for newer, similarly-scaled apartment buildings in and near West Los Angeles.

⁵ LA Housing & Community Investment Dept. affordable rent schedule for Density Bonus program (Schedule VI), August 1, 2015, net of utility allowances, per Housing Authority of the City of Los Angeles.

⁶ Amoroso Companies; verified by closing statement dated April 6, 2015.

⁷ HR&A estimate of weighted retail and residential costs based on Marshall & Swift Cost Estimator software, January 2016 data for LA area. Includes demolition, and site work; factored to remove soft costs listed separately.

⁸ HR&A assumptions typical for this type of project and/or calculations.

⁹ Based on HR&A review of third party data sources (e.g., CoStar data for sale of similar buildings within relevant, proximate submarkets since 2012.)

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