COMMUNITY DEVELOPMENT COMMISSION
of the County of Los Angeles
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Executive Director

ADOPTED
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

1-D April 14, 2015

PATRICK OGAWA
ACTING EXECUTIVE OFFICER

April 14, 2015

The Honorable Board of Commissioners
Community Development Commission
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Commissioners:

APPROVAL OF FUNDING AND ENVIRONMENTAL DOCUMENTATION FOR THE MOSAIC GARDENS AT WESTLAKE AFFORDABLE HOUSING DEVELOPMENT (DISTRICT 1) (3 VOTE)

SUBJECT

This letter recommends that your Board approve the allocation of Affordable Housing Trust Funds for the Mosaic Gardens at Westlake affordable multifamily rental housing development, and related environmental documents, as a result of Notice of Funding Availability (NOFA) for Affordable Multifamily Rental Housing, Round 20 issued by the Community Development Commission (Commission).

IT IS RECOMMENDED THAT THE BOARD:

1. Acting as a responsible agency pursuant to the California Environmental Quality Act (CEQA), certify that the Commission has considered the attached Initial Study/Mitigated Negative Declaration (IS/MND) for the Mosaic Gardens at Westlake project, which was prepared by the City of Los Angeles as lead agency; find that the mitigation measures identified in the IS/MND for this project are adequate to avoid or reduce potential impacts below significant levels; and find that this project will not cause a significant impact on the environment.

2. Approve a loan to LINC Housing Corporation, using Affordable Housing Trust Funds in a total amount of up to $1,635,000 for the development of Mosaic Gardens at Westlake, a 125-unit multifamily housing development that will include 63 units set aside for homeless households, to be located at 1416 Beverly Blvd., in the City of Los Angeles.

3. Authorize the Executive Director, or his designee, to negotiate, execute and, if necessary, amend,

reduce or terminate a loan agreement with LINC Housing Corporation, or the Commission-approved Designee, and all related documents, including but not limited to documents to subordinate the loans to senior construction and permanent financing, and any intergovernmental, interagency, or inter-creditor agreements necessary for the implementation of the development, following approval as to form by County Counsel.

4. Authorize the Executive Director, or his designee, to incorporate, as needed, up to $1,635,000 in Affordable Housing Trust Funds into the Commission's approved Fiscal Year 2014-2015 budget, for the purposes described above.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The purpose of this action is to allocate a total of $1,635,000 in Affordable Housing Trust Funds awarded as part of NOFA Round 20, which will finance the development of the Mosaic Gardens at Westlake project. This project will provide a total of 125 new housing units, of which 63 units will be set aside for homeless households, 35 units for low-income seniors, 25 units for low-income families, and two onsite manager's units.

Approval of the proposed project is requested to ensure that the development can meet the April 20, 2015 deadline for submitting an Affordable Housing and Sustainable Communities application to the California Department of Housing and Community Development (HCD).

FISCAL IMPACT/FINANCING

The recommended loan will provide a total amount of up to $1,635,000 in Affordable Housing Trust Funds to finance the 125-unit Mosaic Gardens at Westlake development. Funds for this loan will be incorporated into the Commission's approved Fiscal Year 2014-2015 budget as needed and included in future years' budget processes as necessary.

The final loan amount will be determined following completion of negotiations with the developer and arrangements with other involved lenders. The loan will be evidenced by a Promissory Note and secured by a Deed of Trust, with the term of affordability enforced by a recorded Covenants, Conditions, and Restrictions document.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

On September 10, 2014, a total of $22,750,000 was made available for NOFA Round 20. To meet demand, the Commission was able to add one-time funding, comprised primarily of returned funds from prior NOFA rounds, bringing the total available to $31,000,000. Of this total, approximately $24,350,000 consists of Community Redevelopment Agency Low-Income and Moderate-Income Housing Fund Due Diligence Review Funds, which the Board of Supervisors has allocated to the Commission for the administration and development of affordable multifamily rental housing. Additionally, there were $4,000,000 in HOME funds, and $2,650,000 in Homeless Bonus Funds allocated by the First Supervisorial District.

A total of 12 applications were received by the October 22, 2014 deadline. Proposals were scored on Design and Sustainability, Supportive Services, and Financial Feasibility. Technical reviews were performed by consultants. Applicants were notified of the scoring results and given two business days to appeal individual scores for procedural or technical errors. A total of four appeals were received. The Commission's Independent Review Panel (Panel) reviewed the consultants' technical

scoring before making funding recommendations to the Commission's Executive Director. The Panel also reviewed and administratively adjudicated applicant appeals.

Of the 12 applications received, the Panel issued funding recommendations for 11 projects. However, there is only enough funding available to assist 10 projects. On February 17, 2015, your Board approved loans to four developments recommended for funding through NOFA Round 20, in a total amount of $11,044,500. The current proposed project is recommended for approval at this time to meet the deadline for submitting an Affordable Housing and Sustainable Communities application to HCD. The Commission will return to your Board in separate actions to recommend awards for the remaining five projects and the remainder of the funding.

It should be noted that the recommended project earned points through the NOFA's Green Building Certification option, which commits projects to incorporate substantial sustainability measures that will result in significantly exceeding state and local building and energy codes. These incentive points are part of the project design category. In addition, the project garnered optional points for incorporating Healthy Design Elements, which were introduced to this NOFA Round through the collaboration between the Commission and the County of Los Angeles Department of Public Health.

The loan agreement and related documents will incorporate affordability restrictions, target assisted populations, and contain provisions requiring the developers to comply with all applicable federal, state, and local laws. The approval of this project will leverage approximately $48.4 million in additional external resources, which is almost 30 times the amount of Affordable Housing Trust Funds invested.

The loan agreement and related documents for this project will reflect the special needs set asides and indicate that the assisted units will be affordable to very low-income households earning no more than 30% of the median income for the Los Angeles-Long Beach Metropolitan Statistical Area, adjusted for family size, as established by the U.S. Department of Housing and Urban Development. The loan agreement will require that the affordable housing units be set aside for a period of up to 55 years. Subject to various underwriting requirements, the developer may be required by the Commission or other lenders to create a single asset entity to designate ownership of the project. This "Designee" will be a Commission-approved single asset entity created by the developer prior to execution of the Loan Agreement and all related loan documents.

ENVIRONMENTAL DOCUMENTATION

As a responsible agency, and in accordance with the requirements of CEQA, the Commission reviewed the IS/MND prepared by the City of Los Angeles for the Mosaic Gardens at Westlake project, and determined that this project will not have a significant adverse impact on the environment. The Commission's consideration of the IS/MND and filing of the Notice of Determination satisfies the State CEQA Guidelines as stated in Article 7, Section 15096.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The requested action will increase the supply of affordable housing and special needs housing in the County of Los Angeles.

Respectfully submitted,

SEAN ROGAN
Executive Director

SR:CC:ml

Enclosures

Environmental Review Section

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

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

WESTLAKE COMMUNITY PLAN AREA

Beverly and Lucas Project

Case No. ENV-2009-2036-MND

Council District No. 13

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

Project Address: 1416 – 1430 West Beverly Boulevard and 109 – 125 ½ South Lucas Avenue, Los Angeles, California 90026

Project Description: The Project, as proposed, would consist of a 153-unit residential building over three levels of subterranean parking. The structure would contain five residential stories above grade and would measure approximately 78 feet in total vertical height. A total of 170 parking spaces would be provided within three subterranean parking levels. The proposed Project would provide approximately 132,251 square feet of residential land uses, in addition to approximately 18,177 square feet of common and private open space amenities. The Project site is located in the Westlake Community Plan area of the City of Los Angeles within the Central City West Specific Plan and would be developed under the provisions of California Senate Bill 1818.

APPLICANT:
Beverly Lucas, LLC

PREPARED BY:
Christopher A. Joseph & Associates

October 15, 2009

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	**COUNCIL DISTRICT**
City of Los Angeles	13
PROJECT TITLE	**CASE NO.**
ENV-2009-2036-MND	APCC-2009-2066-SPE-ZAA-ZAD-SPP

PROJECT LOCATION
1416-1430 West Beverly Boulevard and 109-125 1/2 South Lucas Avenue

PROJECT DESCRIPTION
The demolition of all existing residential and industrial uses on the site and the proposed construction, maintenance, and use of a new as a 6-story (up to 87-foot tall), 153-unit multifamily residential project (containing approximately 132,351 square feet of floor area) with 170 parking spaces within three subterranean parking levels, including approximately 15,958 square feet of common and open space amenities (such as a lobby, fitness room, community room, swimming pool, and open space) all on an approximate 54,900 square foot site in the RC4(CW)-U/3.7 Zone and R4(CW) Zone. In addition, the applicant has indicated that they will haul approximately 24,089 cubic yards of soil. Per APCC-2009-2066-SPE-ZAA-ZAD-SPP, the applicant is requesting that Pursuant to LAMC Section 11.5.7, the following Specific Plan Exceptions from the Central City West Specific Plan (CCWSP): (1) From Section 6.F.3.a.2 of the CCWSP to permit a 153-unit multi-family project without commercial floor area, which is otherwise required within the Specific Plan's RC4(CW) Zone; (2) From Section C.1 of Appendix D of the CCWSP and consistent with LAMC Section 11.5.7.F.1 (c) to provide 15,958 square feet of open space as defined by the CCWSP and 12,092 square feet of open space as defined by the LAMC in lieu of the 16,150 square feet of open space required. Also, pursuant to LAMC Section 12.24.X.26, a Zoning Administrator's Determination to deviate from LAMC Section 12.21.C.8.a to provide more than two retaining walls and to build retaining walls in excess of the permitted height including: (1) Build a maximum 4 retaining walls in lieu of the maximum 2 allowed; (2) Provide 8-foot tall building walls (from natural grade) in the front yard; (3) Provide the maximum 4 retaining walls to be 8 feet tall from natural grade in lieu of the 3 feet, 6 inches feet required above natural ground level adjacent to a feature, railing or ramp; (4) Provide a retaining wall with a maximum height of 20 feet in the side and rear yards lieu of the maximum 12 feet allowed. Also, pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to permit three canopies with a 2-foot 6-inch side yard setback for a length of approximately 20 feet along Lucas Avenue in lieu of the required 9 feet; Pursuant to LAMC Section 12.22.A.25, the applicant is setting aside 15% of the project's total units for low income households for a period of 30 years, and is requesting the following: (1) to permit an additional 6% density bonus (an additional 9 units) over what is permitted by-right on the site in lieu of the 27.5% increase allowed for project a project providing 15 percent of low income affordable units, and 2) provide 170 parking spaces in conformance with Parking Option No. 1 as stated in LAMC Section 12.22.A.25.d.1. Finally, pursuant to Section 17.A.1 of the CCWSP and LAMC Section 11.5.7.C, a Project Permit Compliance Review with the Central City West Specific Plan. In conjunction with the Project Permit Compliance, the Applicant requests permission to locate 50% of the required trees off-site as provided for by Appendix D Section C 2 of the CCWSP. Pursuant to various sections of the LAMC, the Applicant will request approvals and permits for the Building and Safety Department and other municipal agencies for project construction actions, including but not limited to the following: demolition, excavation, haul route, shoring, grading, foundation, building, and tenant improvements.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Beverly Lucas, LLC. Attn: Matthew Sullivan
515 S. Figueroa, Suite 1060
Los Angeles, CA 90071

FINDING:

The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-make may adopt the mitigated negative declariation, 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 THIS FORM	TITLE	TELEPHONE NUMBER
HAYDEE URITA-LOPEZ	City Planning Assistant	(213) 978-1453

ADDRESS	SIGNATURE (Official)	DATE
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012		11/04/2009

☞ DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

[signature]	Planning Assistant
SIGNATURE	**TITLE**

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as

BEVERLY AND LUCAS PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Submitted to:

The City of Los Angeles
Department of City Planning
Expedited Environmental Review Unit
200 North Spring Street, 7th Floor
Los Angeles, CA 90012-2601

APPLICANT:
Beverly Lucas, LLC
2275 East Huntington Drive, Suite 241
San Marino, CA 91108

Submitted by:

11849 West Olympic Boulevard, Suite 101
Los Angeles, CA 90064

October 15, 2009

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APPENDICES (UNDER SEPARATE COVERS)

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VOLUME II OF II

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I. INTRODUCTION

A. INTRODUCTION

The subject of this Initial Study (IS) is the Beverly and Lucas Project herein referred to as "Project" or "proposed Project". The Project site is located in the Westlake Community Plan area of the City of Los Angeles within the Central City West Specific Plan at 1416 West Beverly Boulevard. The L-shaped Project site fronts West Beverly Boulevard and South Lucas Avenue and is generally bounded by West Beverly Boulevard to the north, West 2nd Street to the south, South Lucas Avenue to the east, and South Witmer Street to the west**.** The Project, as proposed, would involve the demolition of all existing uses on the Project site. The existing structures and associated amenities would be replaced by a multi-family residential building comprised of five residential stories, 153 for-rent dwelling units with associated landscaping and amenities, over three levels of under-structure parking.[1] Excavation and grading would occur on the Project site to accommodate the Project's proposed subterranean parking. A more detailed description of the proposed Project is provided in Section II, Project Description, of this Initial Study.

The Project Applicant is Beverly Lucas, LLC. The City of Los Angeles Department of City Planning is the Lead Agency for the Project under the California Environmental Quality Act (CEQA).

B. PROJECT INFORMATION

Project Title:	Beverly and Lucas Project
Project Applicant:	Beverly Lucas, LLC 2275 East Huntington Drive, Suite 241 San Marino, CA 91108
Project Location:	1416 West Beverly Boulevard, Los Angeles, California 90026
Lead Agency:	City of Los Angeles Department of City Planning Expedited Environmental Review Unit 200 North Spring Street, Room 750 Los Angeles, CA 90012-2601
City Contact Person:	Sarah Hounsell (213) 978-1382

[1] *The proposed Project would be considered a "six-story" building per the LAMC and CBC. While the Project would contain five stories of residential units and three levels of parking, only one of the parking levels is considered a "story" pursuant to the LAMC and CBC.*

C. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into seven sections as follows:

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

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

Initial Study Checklist: This section contains the completed Initial Study 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 Initial Study.

Appendices: This includes the various technical reports and information used in the preparation of the Initial Study.

II. PROJECT DESCRIPTION

A. INTRODUCTION

The following is a description of the components that would comprise the Beverly and Lucas Project herein referred to as "Project" or "proposed Project".

B. PROJECT APPLICANT

The Project Applicant for the proposed Project is:

Beverly Lucas, LLC
2275 East Huntington Drive, Suite 241
San Marino, California 91108

C. PROJECT LOCATION

The Project site is located at 1416 West Beverly Boulevard[1] in the City of Los Angeles (City) Central Sub Area[2] of the Central City West Specific Plan,[3] which is within the boundaries of the Westlake Community Plan. The L-shaped Project site fronts West Beverly Boulevard (i.e., northern portion) and South Lucas Avenue (i.e., southern portion), and is generally located between West Beverly Boulevard to the northeast, multi-family residential housing to the south, South Lucas Avenue to the southeast, and South Witmer Street to the northwest (see Figure II-1, Regional and Project Vicinity Map). Two alleys run adjacent to the Project site. The east-west alley runs adjacent to the northern portion of the Project site that fronts Beverly Boulevard, while the north-south alley runs adjacent to the southern portion of the Project site that fronts on South Lucas Avenue.

The Assessor Parcel Numbers (APNs) that correspond with the Project site are: 5153-030-001, -002, -003, -004, -005, -021, -022, -023, and -024. The parcel fronting South Witmer Street between the east-west alley is not a part of the Project. The Project site spans approximately 54,900 square feet of gross lot area, or approximately 1.26 acres, including area vacated back to the site within the alley. After street dedications, the Project's lot area would be approximately 50,630 square feet, or approximately 1.16 acres. The Project site is bounded by mixed residential and commercial development to the north, Belmont High School and an adjacent two-story residential building to the west, a new multi-family

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[1] *Existing project site addresses include 1416 to 1430 W. Beverly Blvd. and 109 to 125 ½ S. Lucas Ave.*

[2] *Central City West Specific Plan, Map No. 3 (Central Subarea Permitted Height and Floor Area), prepared by City of Los Angeles Planning Department, Graphic Services Section, July 2000, available online at: http://www.lacity.org/pln/complan/specplan/spmaps/Detail/ccw3csub.pdf.*

[3] *Ordinance No. 166,703 effective April 3, 1991. Amended by Ordinance No. 167,944 effective June 29, 1992. Amended by Ordinance No. 176,519 effective April 19, 2005.*

building, approximately five-stories in height, to the east, and single- and multi-family residences to the south, including a new five-story[4] residential building. Additionally, a new (two-year occupied) five-story multi-family affordable apartment building is located directly across both alleys to the west of the Project site.

Regional access to the Project site is provided by the Hollywood Freeway (US-101), located less than one mile north of the Project site, and the Harbor Freeway (I-110), located less than one mile west of the Project site. In addition, a network of Class II Major Highways, Collector, and Local roadways, including West Beverly Boulevard to the north, South Witmer Street to the west, South Lucas Avenue to the east, and West 2nd Street to the south, would provide local access to the Project site. An aerial photograph portraying the Project site and surrounding area is included as Figure II-2, Aerial Photograph.

D. ENVIRONMENTAL SETTING

Description of Project Site

City of Los Angeles General Plan

California State Government Code Section 65300 requires each county and city, including charter cities, to adopt a comprehensive General Plan which should be integrated and internally consistent with a compatible statement of goals, objectives, policies and programs to provide for a decision-making basis on physical development. The Project site falls within the jurisdiction of the City of Los Angeles General Plan (General Plan), which was adopted by the Los Angeles City Council. The General Plan consists of 11 elements, including: 1) Framework; 2) Transportation; 3) Infrastructure Systems; 4) Land Use; 5) Housing; 6) Noise; 7) Air Quality; 8) Conservation; 9) Open Space; 10) Historic Preservation and Cultural Resources; and 11) Public Facilities and Services Element.

Westlake Community Plan

The Project site is located within the Westlake Community Plan area, which is one of 35 community plan areas that make up the City's General Plan Land Use Element. The Westlake Community Plan (Community Plan) designates the portion of the Project site fronting West Beverly Boulevard north of the east-west alley (i.e., northern portion) for Mixed-Use Commercial Residential land uses, including those permitted in the RC4, RC5, RAS3, and RAS4 zones. The portion of the Project site fronting South Lucas Avenue south of the north-south alley (i.e., southern portion) is designated for Multi-Family High Medium Residential land uses, including those permitted in R4 zones. The High Medium Residential portion of the site is within Height District No. 1.[5]

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[4] *APC approval indicates a permitted height of 77 feet was made for this building.*

[5] *General Plan Land Use Map, Westlake Community Plan, A part of the General Plan of the City of Los Angeles, dated February 20, 2008.*

City of Los Angeles Zoning Regulations

Central City West Specific Plan

Under Section 12.16.1 of the Los Angeles Municipal Code (LAMC), the Project site is currently zoned as CW. The "CW" designation indicates the Project site is within the Central City West Specific Plan Zone. The Central City West Specific Plan (Specific Plan) is divided into three sub areas. The Project site is located in the Central Sub Area within the Witmer/Lucas Residential District.[6] As specified in the Specific Plan, the regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of LAMC Chapter 1, as amended, and any other relevant ordinance. As noted in Section 3.B. of the Specific Plan, wherever the Specific Plan contains provisions which require greater setbacks, greater street dedications, lower densities, lower heights, more restrictive uses, more restrictive parking requirements, or other greater restrictions or limitations on development; or less restrictive setbacks, less restrictive uses or less restrictive parking requirements than would be allowed or required pursuant to the provisions contained in Chapter 1 of the LAMC, the Specific Plan shall prevail and supersede the applicable provisions of that Code. If the Specific Plan is silent, then the LAMC applies.

Under the Specific Plan, the northern and southern portions of the Project site fall under two different zoning designations which are consistent with their land use designations, RC4(CW)-U/3.7 (Lots 1-8) fronting West Beverly Boulevard and R4(CW)-75/3 (Lots 21-23) fronting South Lucas Avenue, respectively. As set forth by Specific Plan Section 6.B.1.(3), the "RC4" component indicates that the northern portion of the Project site is designated for "Residential and Commercial Mixed Use," and per Section 6.B.1.(1), the "R4" component indicates that the southern portion of the Project site is designated for "Multiple Dwelling" use.

Section 6.F.3 of the Specific Plan states the uses permitted in the "RC4(CW)" zone include any use permitted in the "R4" (Multiple Dwelling) and "C2" (Commercial) zones as set forth in Sections 12.11 and 12.14 of the LAMC provided that all activities are conducted wholly within an enclosed building, with the exception of sidewalk sales, outdoor dining, and newsstand operations. Land uses allowed in the "R4" zone include, but are not limited to, one- and two- family dwellings, multiple dwellings and apartment houses. Section 6.F.1 of the Specific Plan requires all development within the RC4(CW) zone to be mixed use. Land uses permitted in the "C2" zone include any use permitted in the C1.5 (Limited Commercial Zone) as set forth by Section 12.13.5-A.2 of the LAMC or in the C1 (Limited Commercial Zone) by Section 12.13-A.2 of the LAMC. Such uses include, but are not limited to, single family dwellings and two-family dwellings or apartment houses. Uses permitted in the "R4(CW)" zone include any use permitted in the "R4" zone as set forth in Section 12.11 of the LAMC, as described above.

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[6] *Central City West Specific Plan, Map No. 3 (Central Subarea Permitted Height and Floor Area), prepared by City of Los Angeles Planning Department, Graphic Services Section, July 2000, available online at: http://www.lacity.org/pln/complan/specplan/spmaps/Detail/ccw3csub.pdf.*

Furthermore, as stated above, the "-U/3.7"[7] and "-75/3" components represent the maximum permitted height of structures within the zone (in feet) and the maximum permitted Floor Area Ratio (FAR). For the northern portion of the Project site fronting West Beverly Boulevard north of the east-west alley, the maximum height and FAR permitted is 1,218 feet above mean sea level and 3.7:1, respectively. For the southern portion of the Project site fronting South Lucas Avenue south of the north-south alley, the maximum permitted height and FAR is 75 feet and 3:1, respectively.

State of California Enterprise Zone

Moreover, additional zoning information classifies the Project site as ZI-2374. This signifies the site is within a State of California Enterprise Zone. Within the Los Angeles Enterprise Zone, businesses can take advantage of State and/or Federal tax credits and deductions not available to businesses elsewhere. The goal of the incentives is to stimulate business attraction, growth, and increased employment opportunities within economically disadvantaged areas of the City.[8]

Existing Land Uses

As discussed above, the Project site is L-shaped and fronts West Beverly Boulevard and South Lucas Avenue. The Project site is currently developed with one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, vacant land, and an industrial building. A Geotechnical Engineering Investigation (Investigation) was prepared for the Project and is included in Appendix E of this Initial Study.[9] The Investigation identified that the site is located on moderately inclined, east and northeast-facing slopes. The top and toe of the site are relatively level, but site elevations vary from 393 feet to 338 feet for a total elevation difference of 55 feet. A very steep, 20 foot high slope is located along West Beverly Boulevard. Due to the steep slopes from both West Beverly Boulevard and South Lucas Avenue, the existing buildings on the Project site are constructed into the hillside. Retaining walls up to eight feet in height are found throughout the Project site.

The on-site vegetation consists of annual grasses, small shrubs and mature trees. A Tree Survey was prepared for the Project and is included as Appendix D, Tree Survey, to this Initial Study.[10] The Tree Survey identified nine trees that meet the City's trunk diameter criterion. The trees on the Project site are

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[7] *The maximum allowable height of buildings on a lot in the "U" Height District is governed by the provisions of Section 8A.3(Urban Density Requirements – Building Height) of the Specific Plan (page 25), which states that buildings or structures located on a lot with a "U" height designation between the centerline of Bixel Street on the east and the centerline of Witmer Street/Hartford Avenue/Blaine Street on the west, such as the project site, shall not exceed a maximum height of 1,218 feet above mean sea level ("amsl").*

[8] *Los Angeles Community Development Department, State Enterprise Zones, website: http://www.lacity.org/cdd/bus_statecred.html, July 16, 2008.*

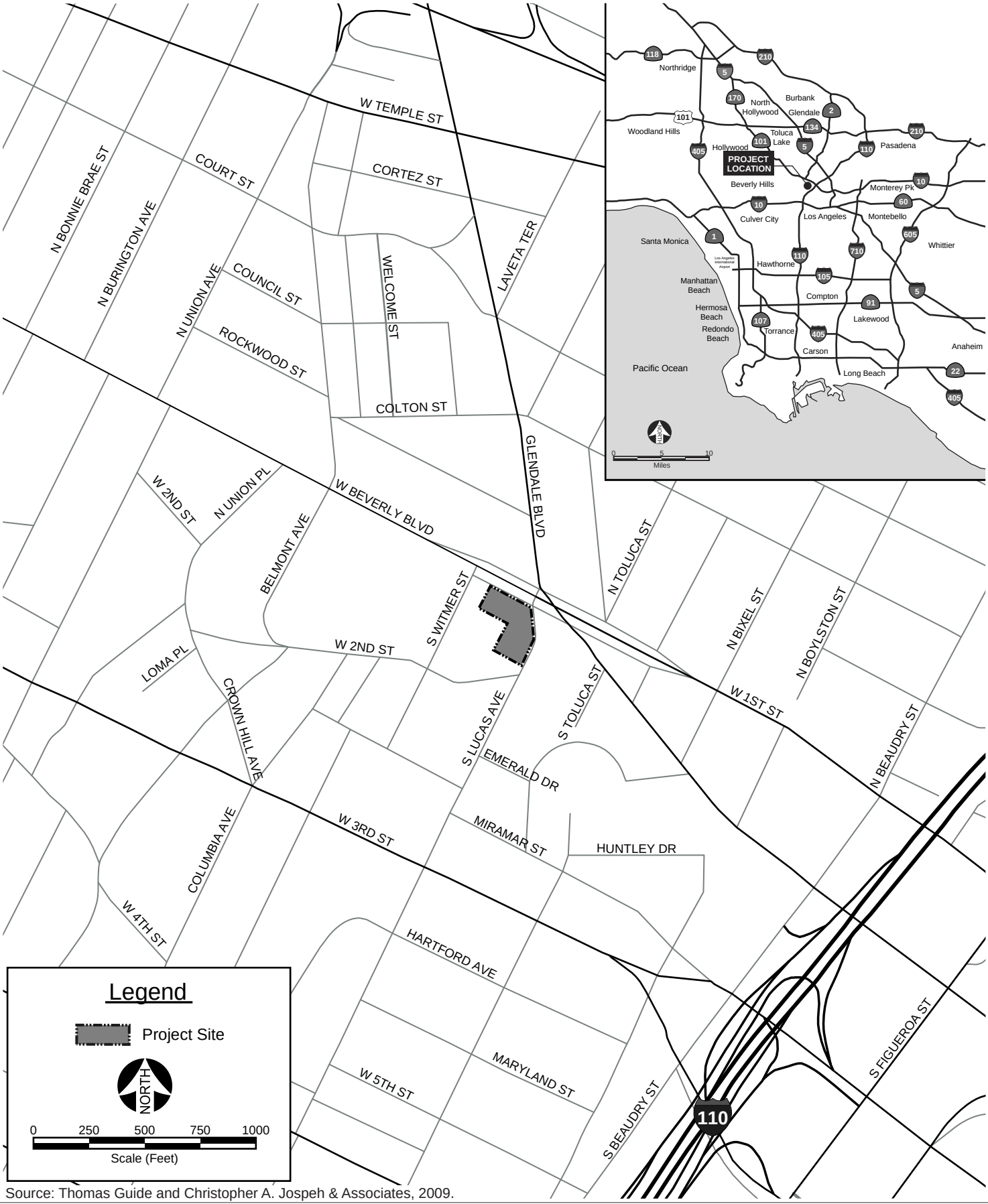
[9] *Geotechnical Engineering Investigation, Geotechnologies, Inc. Consulting Geotechnical Engineers, November 21, 2007.*

[10] *Tree Survey, S. Lynn Kaufman, Landscape Architect, CA License #2975, August 19, 2009.*

all ornamental-exotic species and have either been planted as part of the landscape development or have colonized the site as non-native, toxic invasives. No protected species trees as defined under LAMC Ordinance 177,404 were observed on the site. Existing on-site buildings range in height from one- to two-stories. Photographs of the existing land uses on the Project site are included as Figure II-3 and Figure II-4, Views of the Project Site.

Description of the Surrounding Area

The area surrounding the Project site is characterized by a dense combination of educational, commercial and residential land uses. Adjacent zoning designations include C2-1-O (Commercial, Height District 1, Oil Drilling District) to the north, R4(CW)-75/3 to the south, RC5(CW)-U/7.5 to the east and PF-1XL (Public Facilities [Belmont High School]) to the west. One- and two- story commercial buildings, interspersed with surface parking lots are located directly north and across the West Beverly Boulevard Bridge from the Project site. A five-story residential development is directly east of the Project site across South Lucas Avenue. Single- and multi-family residential buildings are located adjacent and to the south of the Project site, including a five-story apartment building located along South Witmer Street. An existing two-story residential building is located adjacent to the west of the Project site. Additionally, Belmont Senior High is located to the west of the Project site, across South Witmer Street. The topography of the area surrounding the Project site is dominated by varying and steep terrain. Photographs of the area surrounding the Project site are depicted in Figures II-5 and II-6, Views of Surrounding Uses.



Source: Thomas Guide and Christopher A. Jospeh & Associates, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-1
Regional and Project Vicinity Map

Source: Google Earth Pro, 2008.

CHRISTOPHER A. JOSEPH & ASSOCIATES
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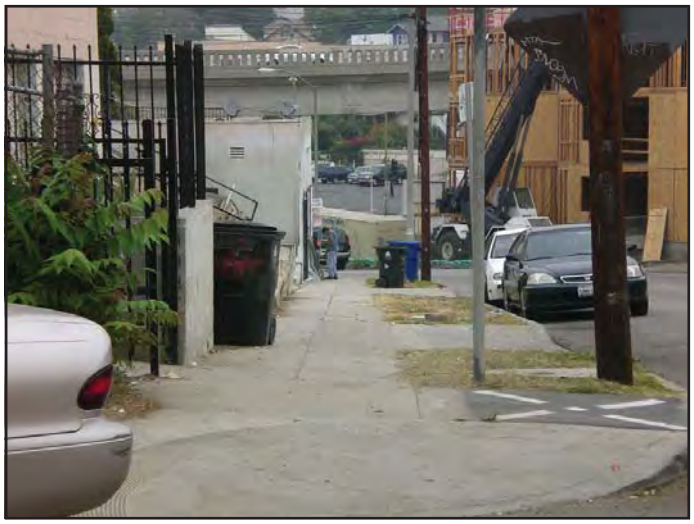
Figure II-2
Aerial Photograph

View 1: Aerial view of the Project site facing northwest.

View 2: View of existing residential uses along southeastern portion of the Project site facing northwest from South Lucas Avenue.



View 3: View of existing residential uses along northeastern edge of the Project site facing north from South Lucas Avenue.

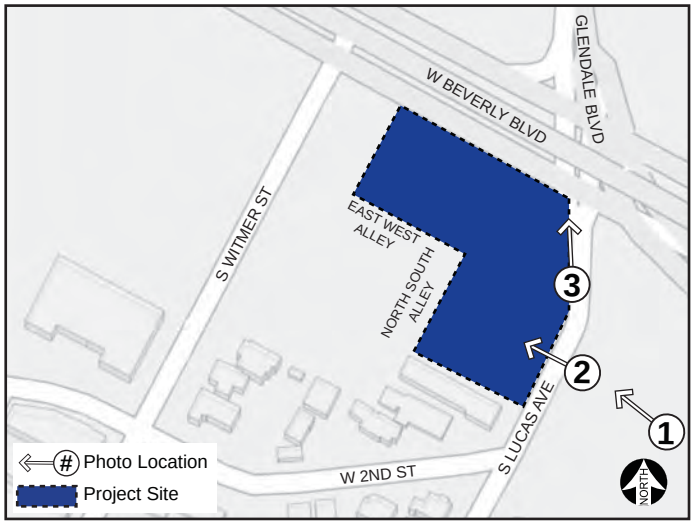


PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-3
Views of the Project Site
Views 1-3

View 4: View of northern edge of the Project site facing southeast from West Beverly Boulevard.

View 5: View of existing residential use from the northwestern portion of the Project site facing northwest.

View 6: View of existing residential uses from the southeastern portion of the Project site facing northwest.

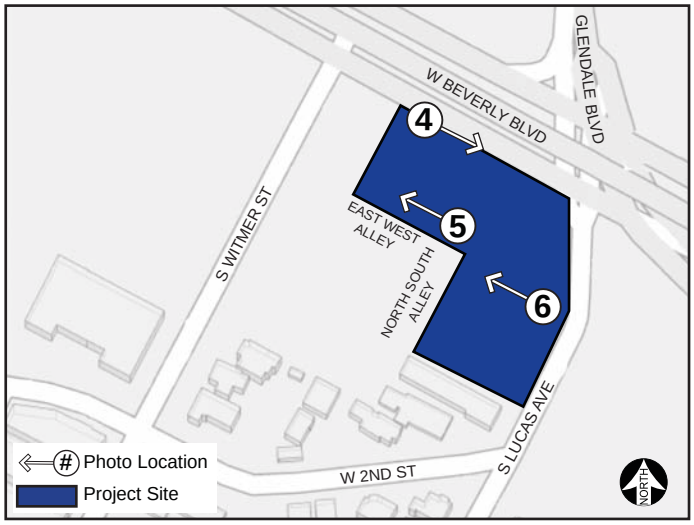


PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-4
Views of the Project Site
Views 4-6

View 7: Aerial view of the Project site and surrounding uses facing southeast.

View 8: Aerial view of the Project site and surrounding uses facing southwest.

View 9: Aerial view of the Project site and surrounding uses facing northwest.

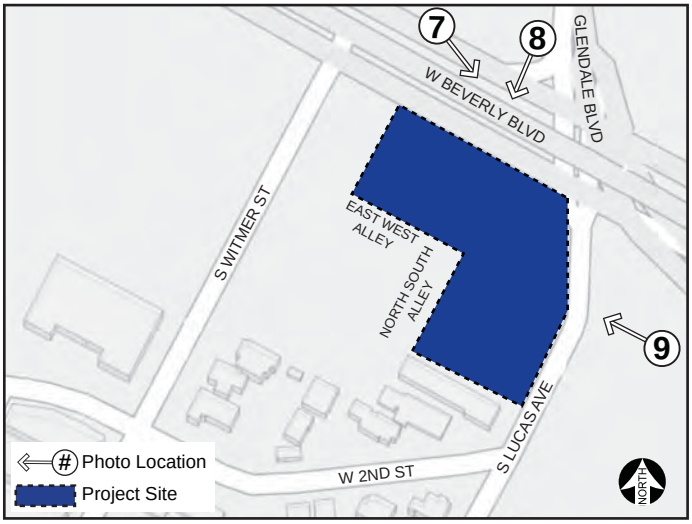


PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-5
Views of Surrounding Land Uses
Views 7-9

View 10: View of existing multi-family residential land use on southwest corner of West 2nd Street and South Witmer Street.

View 11: View of existing residential land use on northeast corner of West 2nd Street and South Witmer Street.

View 12: View towards corner of West Beverly Boulevard and South Witmer Street facing northeast.

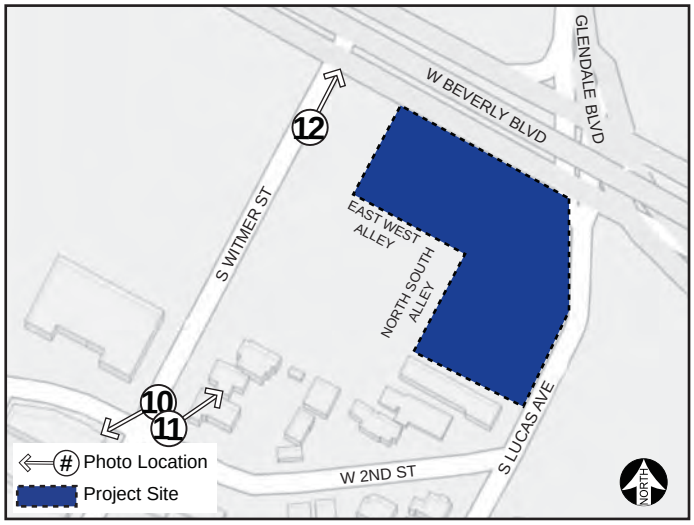


PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2009.

E. PROJECT CHARACTERISTICS

The Project, as proposed, would involve the demolition of all existing residential and industrial uses on the Project site and the removal of associated landscaping and parking. Excavation and grading would occur on the Project site to accommodate the Project's proposed subterranean parking. The existing development would be replaced by a multi-family residential building comprised of five residential stories, 153 for-rent dwelling units with associated landscaping and amenities, over three levels of under-structure parking.[11]

Under the Los Angeles Municipal Code (LAMC), a minimum of 400 square feet of lot area is required per dwelling unit. Accordingly, based on the Project site's pre-dedicated lot area of 57,709 square feet (approximately 1.33 acres), the site generates a total of 144 by-right for-rent residential dwelling units,[12] of which 15 percent, or 22 dwelling units, are required to be reserved[13] for low-income housing tenants. In exchange for providing the low income units, the Project is entitled under LAMC Section 12.22 A.25(c)(3) and California Senate Bill 1818 to a 27.5 percent density bonus, or 40 dwelling units, for a total of 184 dwelling units and the right to request one development regulation incentive or waiver. However, the proposed Project will only utilize a six percent density bonus, or nine dwelling units, to achieve its proposed density of 153 dwelling units. However, it will require certain discretionary actions to facilitate the proposed Project on this irregularly shaped steeply sloping site.

Proposed Uses

The proposed Project would provide a total of 153 multi-family dwelling units, comprised of a combination of approximately 136 studio and one-bedroom units, and 17 two-bedroom units. Some units would be designed with lofts and those without lofts would be one-level. The Project would offer a variety of amenities for residents, including a lobby, fitness room, recreation room, swimming pool and open space. Parking for Project residents would be provided within three structured-parking levels, which would contain a total of 170 total parking spaces and would be located under the five residential levels. Figures II-7 through II-9 illustrate the three levels of understructure parking. There is no commercial component associated with the Project. Figures II-10 through II-15 illustrate the Project's site plan and five proposed residential levels.

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[11] *The proposed Project would be considered a "six-story" building per the LAMC and CBC. While the Project would contain five stories of residential units and three levels of under-structure parking, only one of the parking levels is considered a "story" pursuant to the LAMC and CBC.*

[12] *57,709 square feet (lot area pre dedication [54,900 square feet] + ½ of existing to alley to remain [2,806 square feet]) / 400 square feet of lot area per dwelling unit = 144.27 = 144 dwelling units*

[13] *The Specific Plan allows for the payment of a per unit in-lieu fee.*

Height and Floor Area Ratio (FAR)

Under the Specific Plan, the maximum height and FAR permitted on the northern portion of the Project site fronting West Beverly Boulevard north of the east-west alley is 1,218 feet above mean sea level (amsl) and 3.7:1, respectively. For the southern portion of the Project site fronting South Lucas Avenue south of the north-south alley, the maximum permitted height and FAR is 75 feet and 3:1, respectively.

To calculate the permitted floor area of a rental project located on this site, its buildable area must be defined by deducting the lot area lost to setbacks for a single-story building. Once defined, the appropriate floor area ratio can be applied, generating the maximum permitted floor area. The buildable area of the R4 zoned southern portion of the Project site is equal to 20,422 square feet, generating 61,266 amount of permitted floor area, while the RC4 zoned northern portion of the Project site's buildable area (27,591 square feet) permits 102,087 square feet of floor area. Combined, the Project site generates 163,353 square feet of permitted floor area. The proposed Project will provide 53,347 square feet in the R4 zoned southern area and 78,904 square feet in the RC4 zoned northern area, for a combined total of 132,251 square feet of floor area, or 31,102 square feet less than what is permitted.

The steep sloping nature of the site entitles the Project to a height exception equal to an additional 12 feet of building height, as long as no point from an adjacent grade to the top of the roof does the Project exceed its permitted building height.[14] Per the Specific Plan, building height is a measure using mean sea level. The proposed building achieves a height of 437 feet above mean sea level (or 87 feet). The Project's proposed five residential stories is significantly below the northern portion of the site's 1,218 foot high limit, but a small portion of the southern portion of the site must utilize three feet of the permitted 12 foot exception[15] to exceed its 75 foot height limit found in the southern portion of the site. See Figures II-16 North-South Building Section and II-17 East-West Building Section and Figure II-18 West and North Elevation and Figure II-19 East and South Elevation.

Setbacks

Pursuant to LAMC Section 12.16.1 "CW" no building or structure nor the enlargement of any building or structure shall be erected or maintained unless the yard, area and loading spaces required by Section 5 of the Specific Plan are provided and maintained in connection with the building, structure or enlargement. No setbacks are required from the zone boundary. The Project would provide a front yard along the portion of the Project site that fronts West Beverly Boulevard (setback 15 feet) and rear yards along the portion of the Project site that front along the east-west alley (setback 18 feet) and the adjacent property to the south between the north-south alley and South Lucas Avenue (setback 18 feet). Side yards (setback nine feet) would be provided between Lots 8 and 9, the portion of the Project that fronts South Lucas

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[14] *LAMC Section 12.21.1 B 2*

[15] *Section 12.21.1 B 2 of the LAMC permits an additional 12 feet in height due to the site's existing slope of greater than 20 feet. Therefore, a maximum height of up to 87 feet is permitted; however the Project is only proposing a maximum of 78 feet in height.*

Avenue, and the portion of the Project that fronts along the north-south alley. No loading space is required as the Project does not include a commercial component. See Figure II-20, Project Site Setbacks.

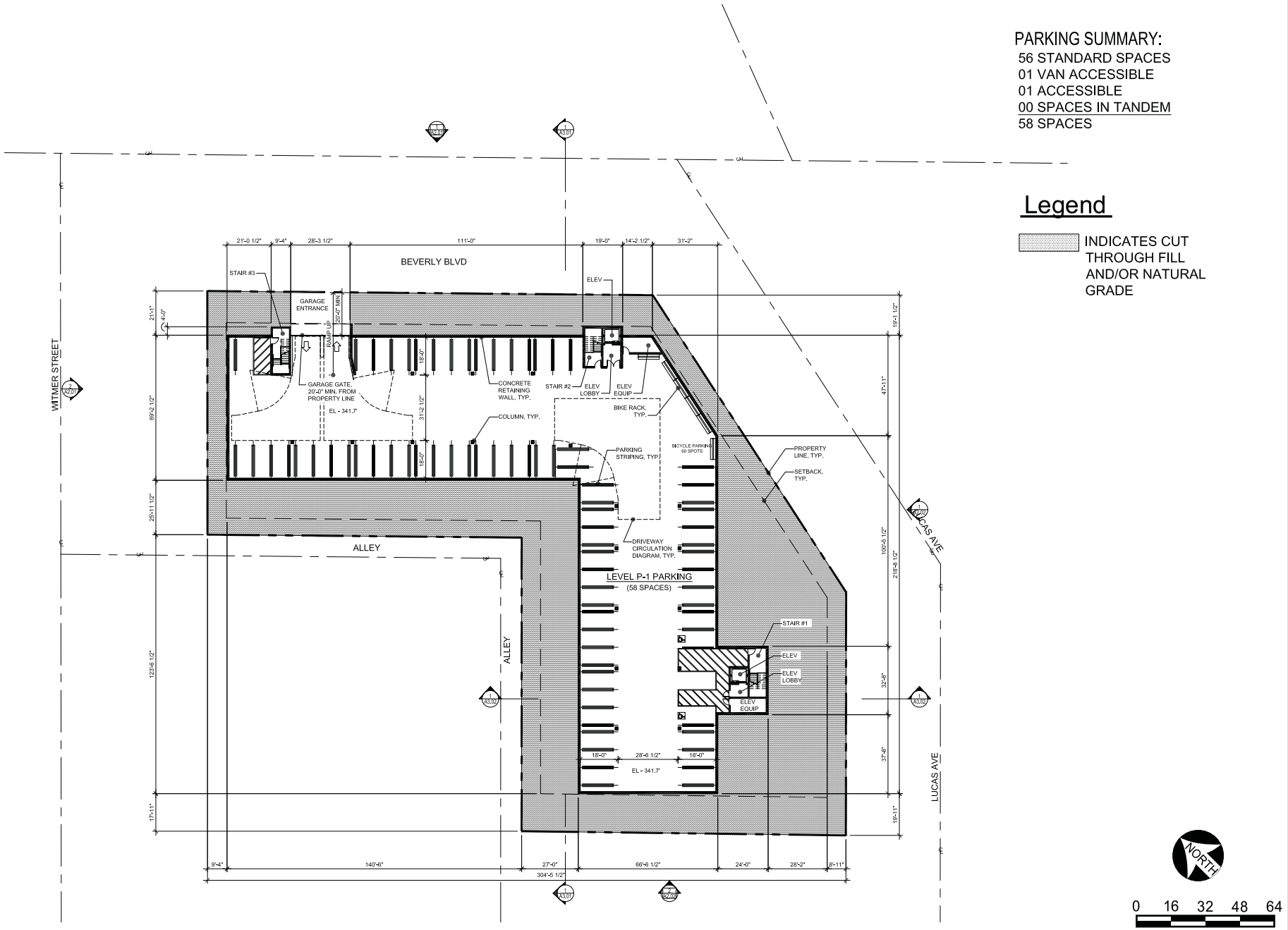
The proposed Project is seeking a yard modification along approximately 20 feet of the side yard along South Lucas Avenue at its intersection with West Beverly Boulevard to permit the encroachment of an over in height stair with landing and three architectural canopies used to reduce the scale of the building. The landing and stairs are part of the retaining system used to create open space, landscape, and smaller, more pedestrian-scale walls along the street frontage. The canopies occur at 19, 41 and 90 feet above the adjacent sidewalk elevation of 342 feet above mean sea level and break the building's façade. The landings are part of the stair and retaining wall system used to reduce the scale of the site's retention requirements.

Access and Circulation

Regional access to the Project site is provided by the Hollywood Freeway (US-101), located less than one mile north of the Project site, and the Harbor Freeway (I-110), located less than one mile west of the Project site. In addition, a network of Class II Major Highways, Collector, and Local roadways, including West Beverly Boulevard to the north, South Witmer Street to the west, South Lucas Avenue to the east, and West 2nd Street to the south, would provide local access to the Project site.

Pedestrian access to the proposed structure would be provided via a ground floor lobby entrance as well as stairways and an elevator that would extend from the parking levels to the fifth floor. In addition, internal pathways connecting the various residential units to the stairways and elevator would be provided on the first through fifth floors.

The Project would consist of two entrances, off West Beverly Boulevard and the east-west alley along the southwest portion of the Project, both of which would provide access to the parking area. The driveway on West Beverly Boulevard eastbound off-ramp is a right-in right-out only driveway and the driveway on the east-west alley would be a full access driveway. The driveway off of West Beverly Boulevard would access only one level of parking and would carry less traffic than the driveway off of the east-west alley, which would access two levels of parking.



Source: PSL Architects, June 1, 2009.

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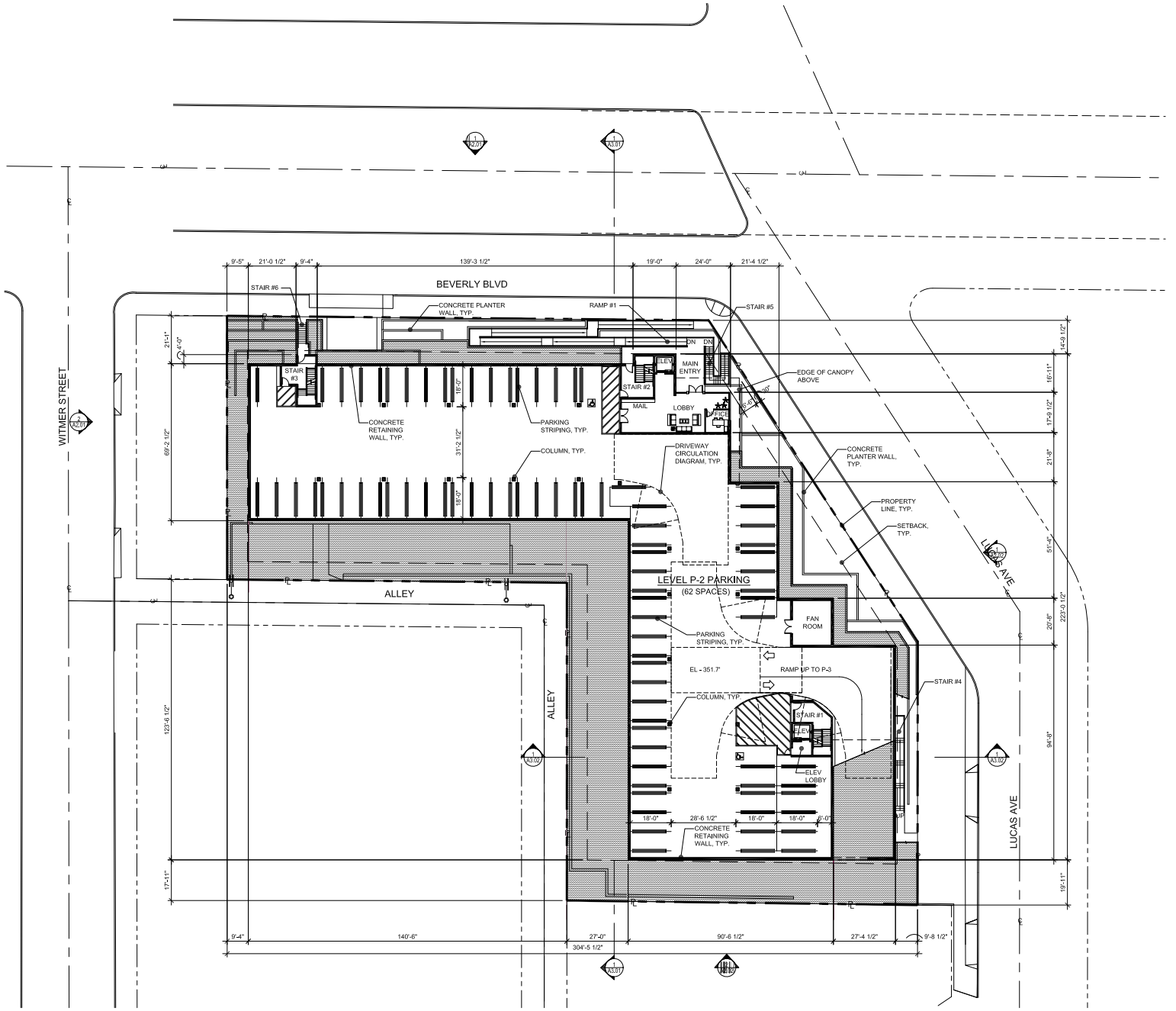
Figure II-7
Parking Level 1



PARKING SUMMARY:
52 STANDAR SPACES
08 IN TANDEM
01 VAN ACCESSIBLE
01 ACCESSIBLE
62 SPACES

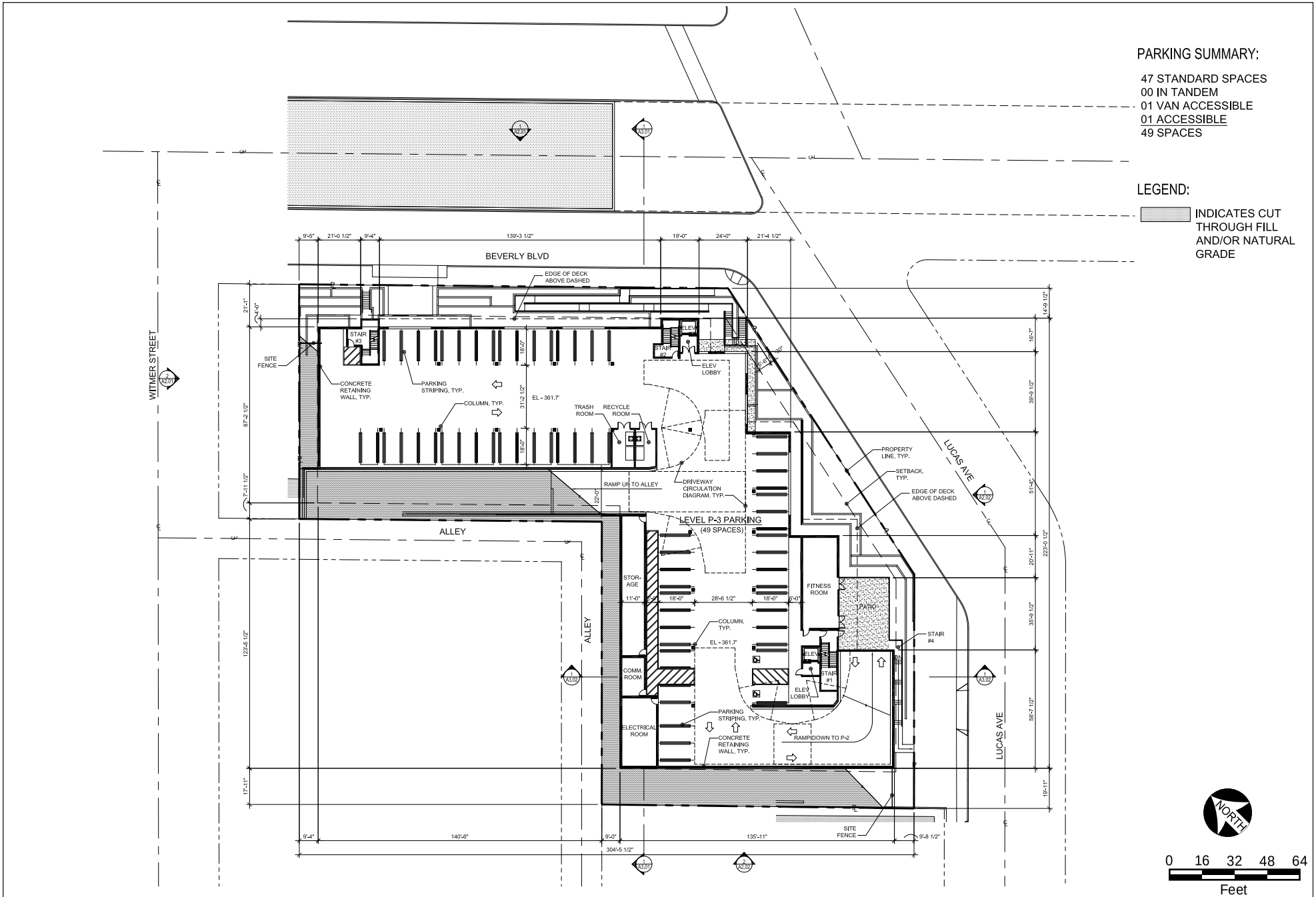
Legend

INDICATES CUT THROUGH FILL AND/OR NATURAL GRADE

Source: PSL Architects, June 1, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-8
Parking Level 2



Source: PSL Architects, June 1, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
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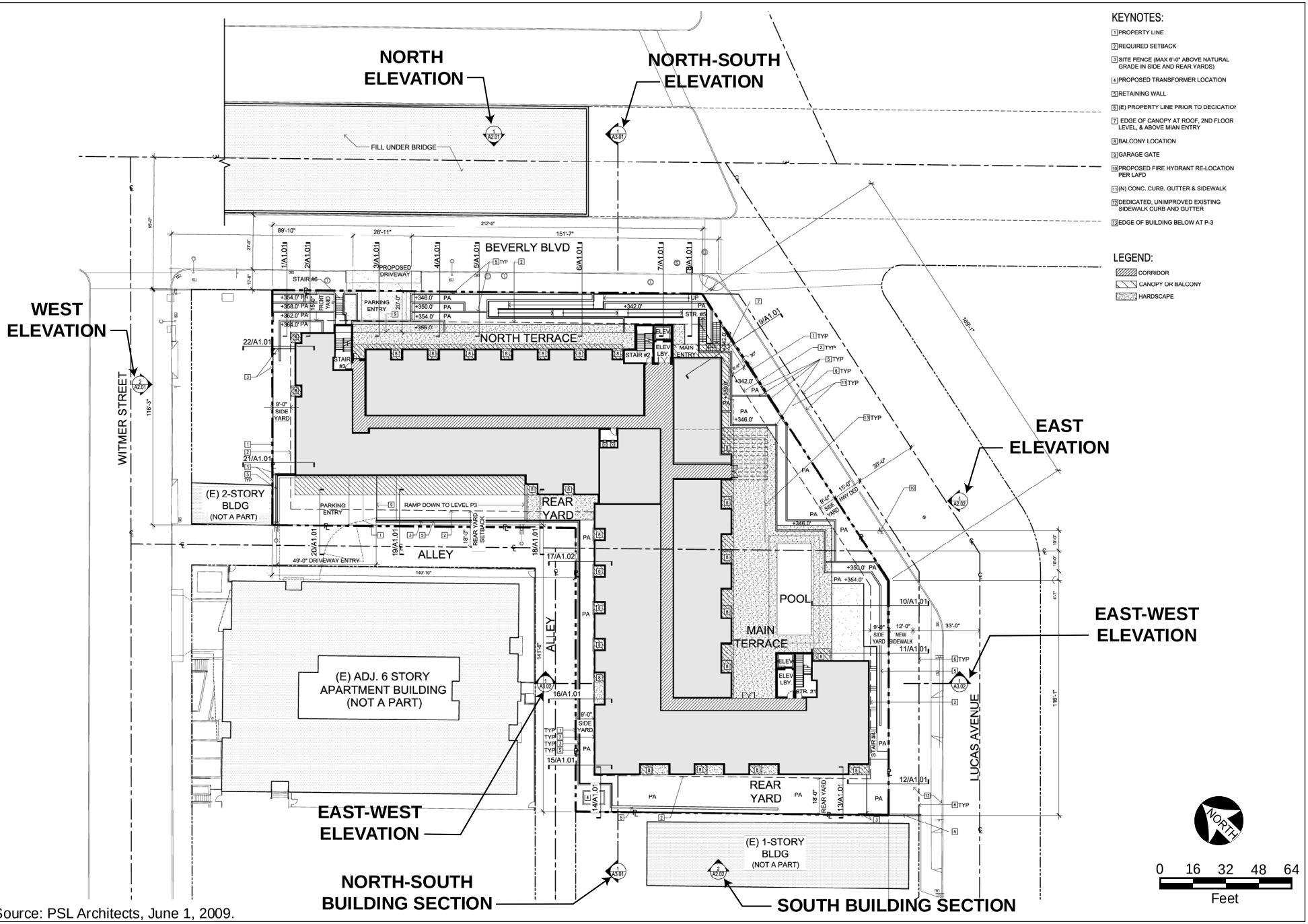
Figure II-9
Parking Level 3



Source: PSL Architects, June 1, 2009.

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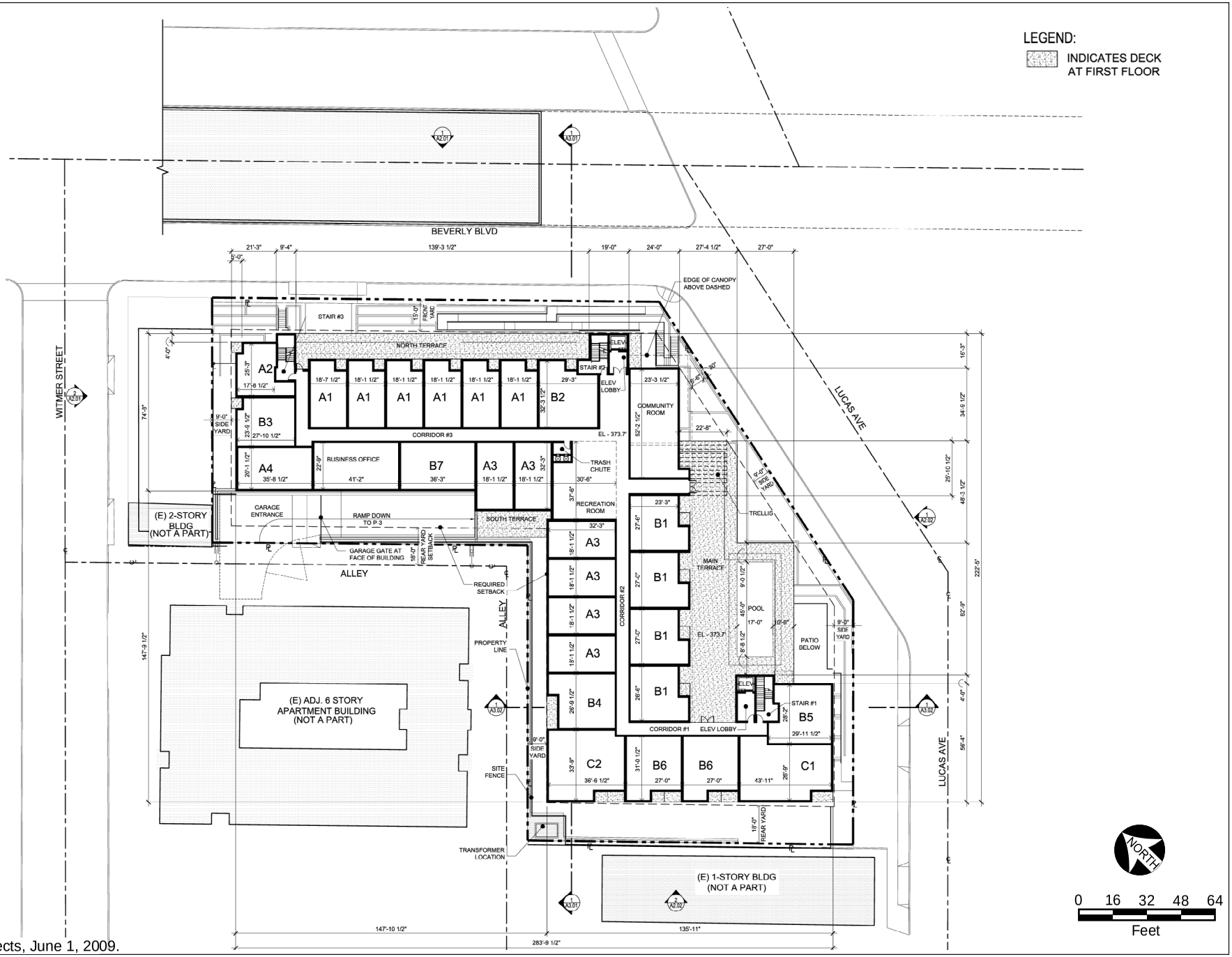
Figure II-10
Site Plan



Source: PSL Architects, June 1, 2009.

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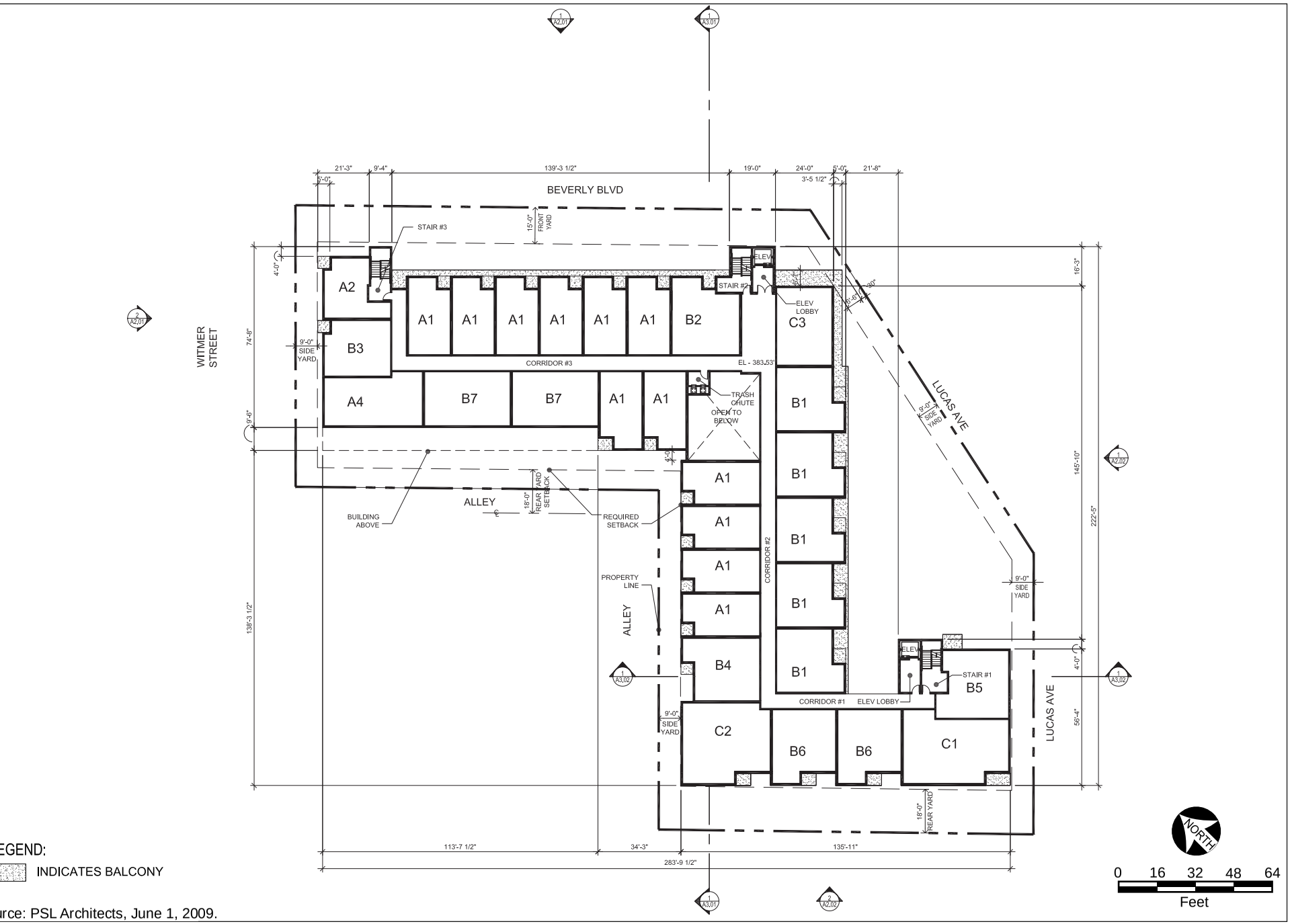
Figure II-11
First Floor Plan



Source: PSL Architects, June 1, 2009.

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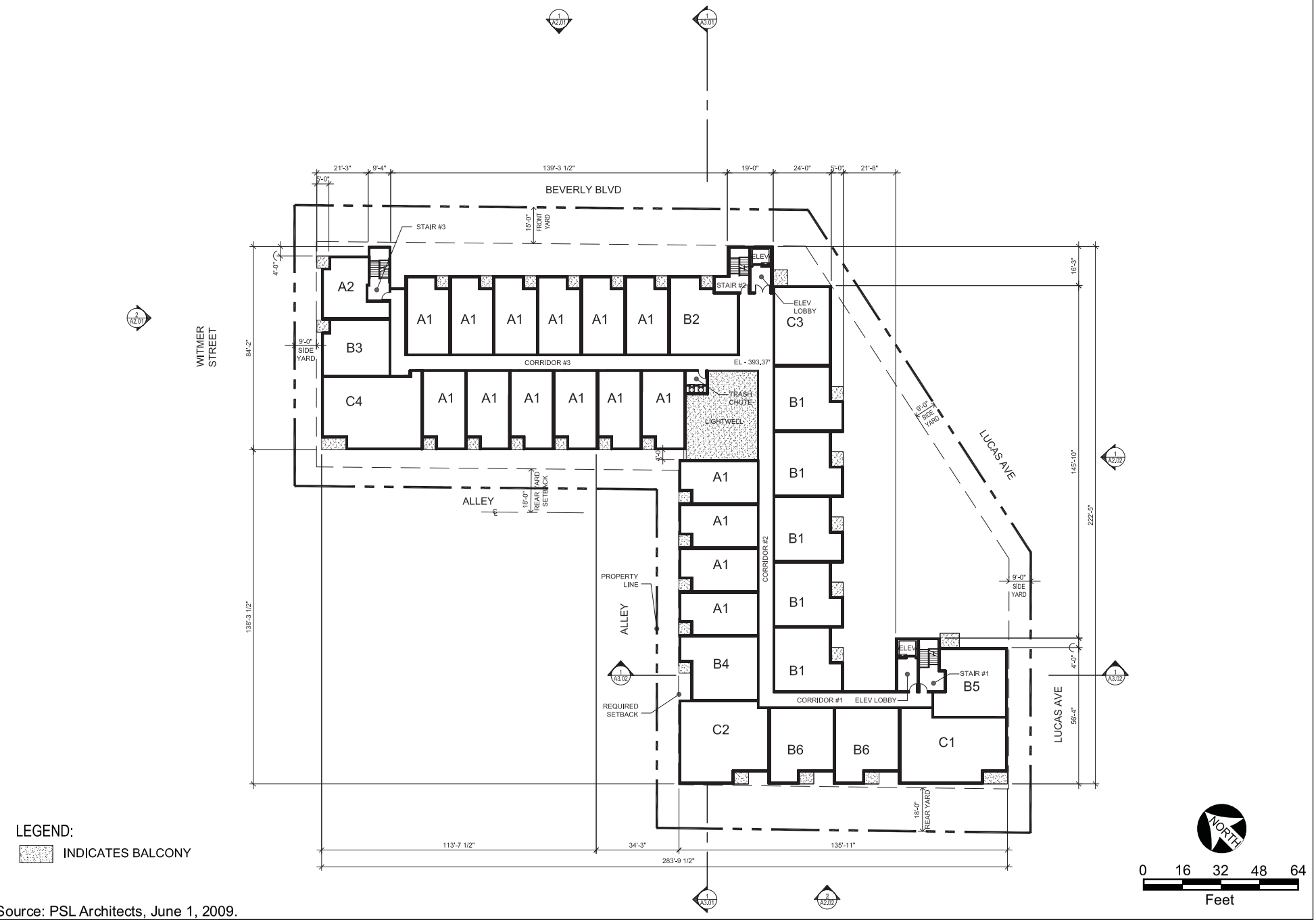
Figure II-12
Second Floor Plan



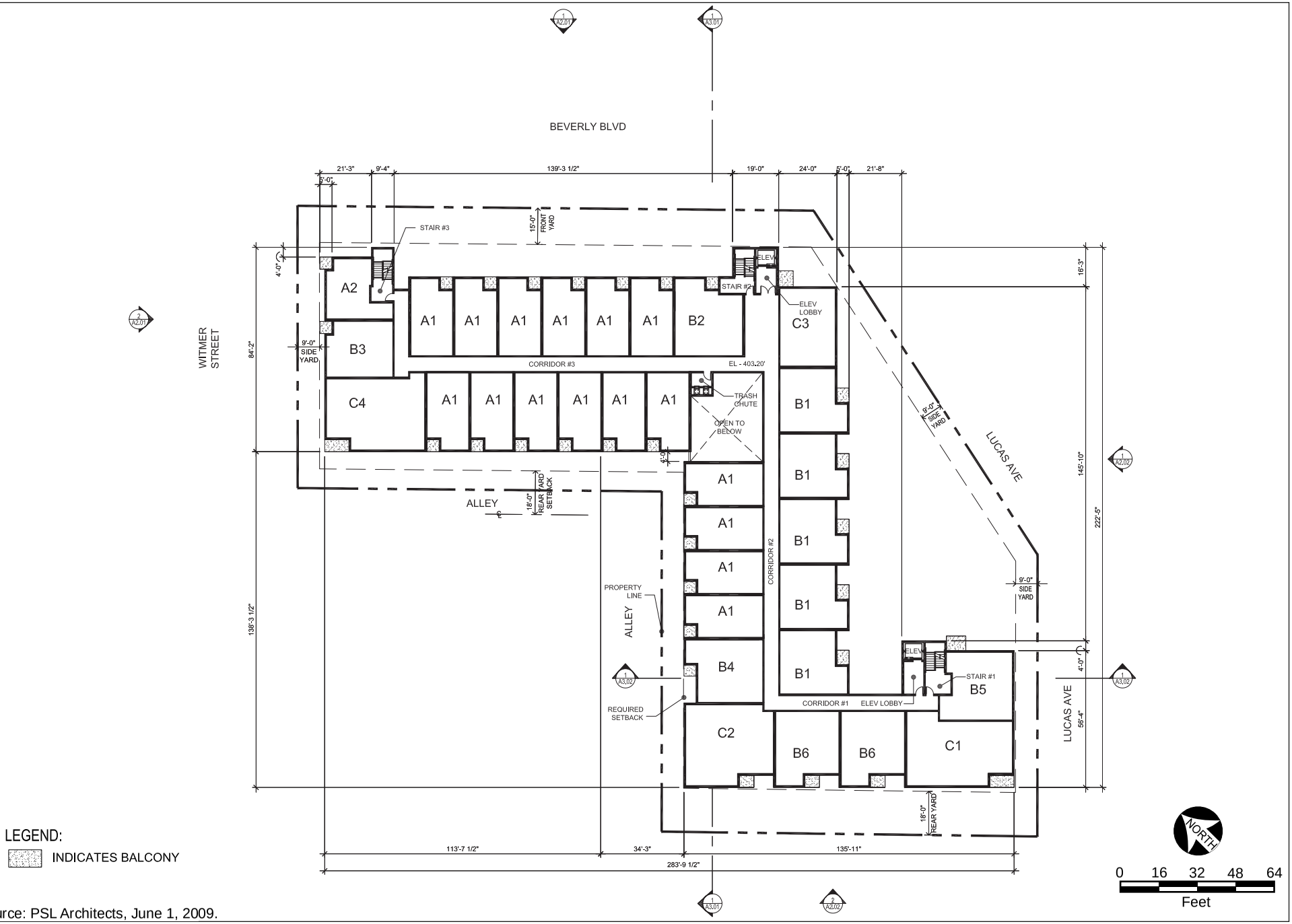
LEGEND:

INDICATES BALCONY

Source: PSL Architects, June 1, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

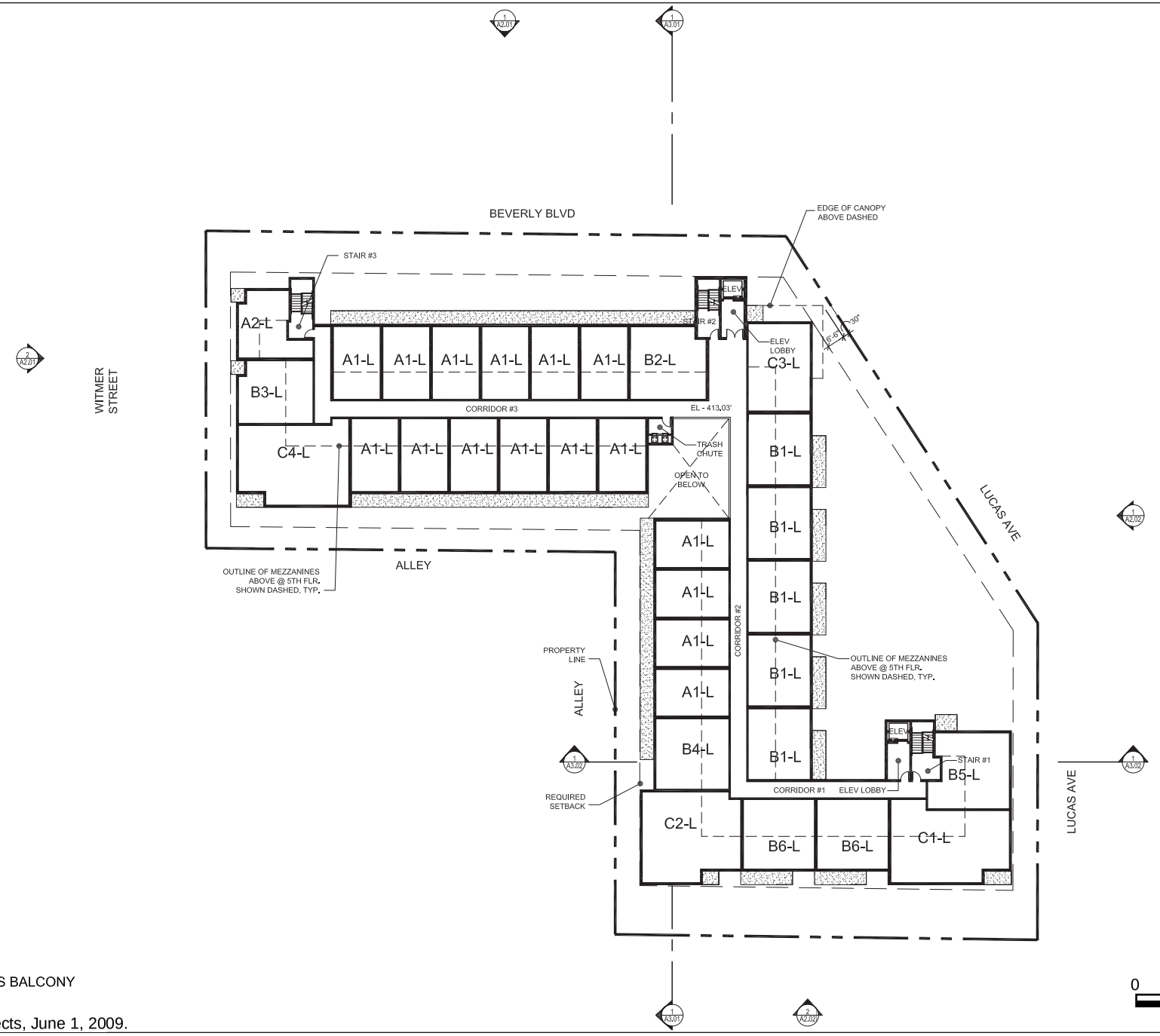
Figure II-13
Third Floor Plan



Source: PSL Architects, June 1, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-14
Fourth Floor Plan



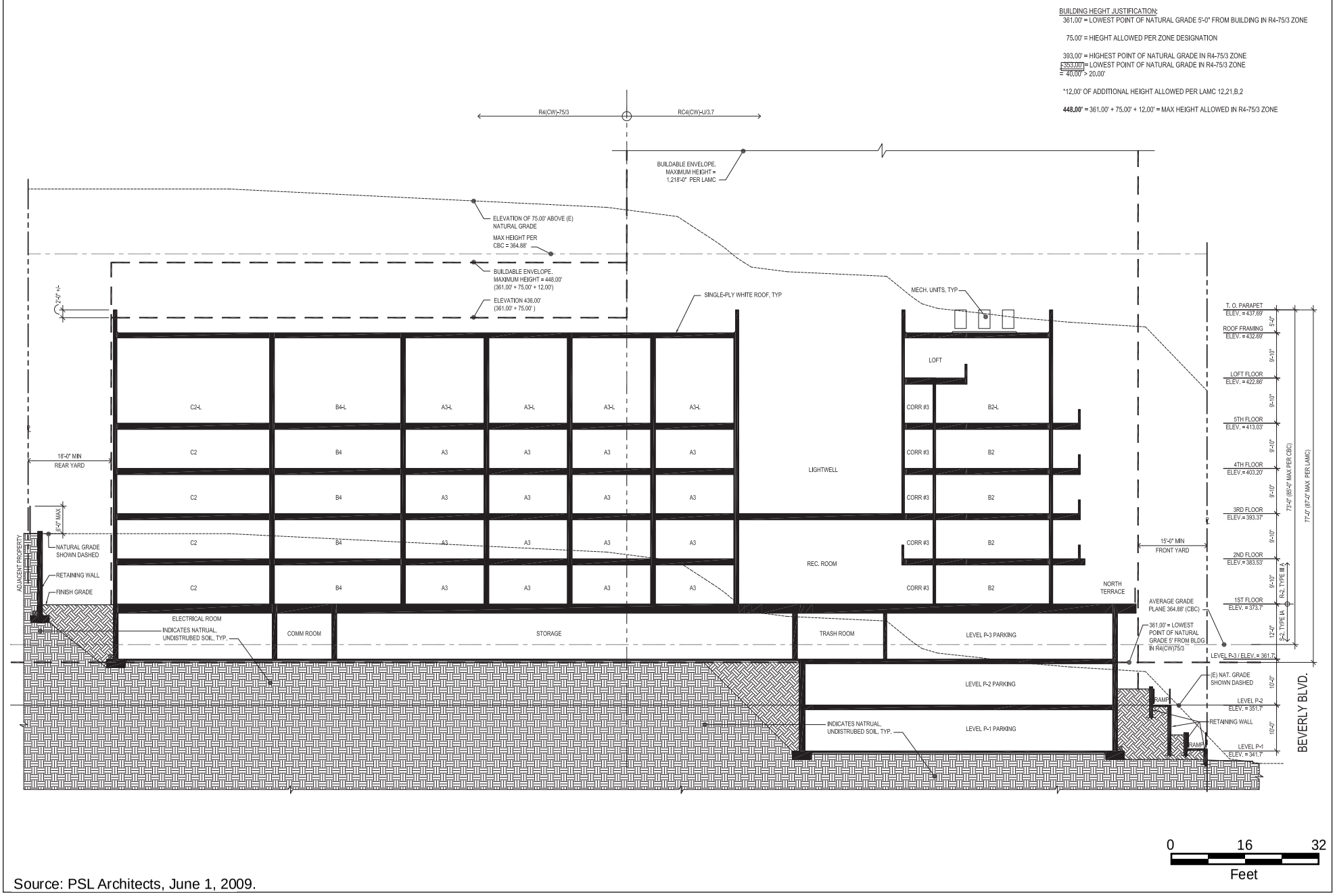
LEGEND:

INDICATES BALCONY

Source: PSL Architects, June 1, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-15
Fifth Floor Plan



Source: PSL Architects, June 1, 2009.

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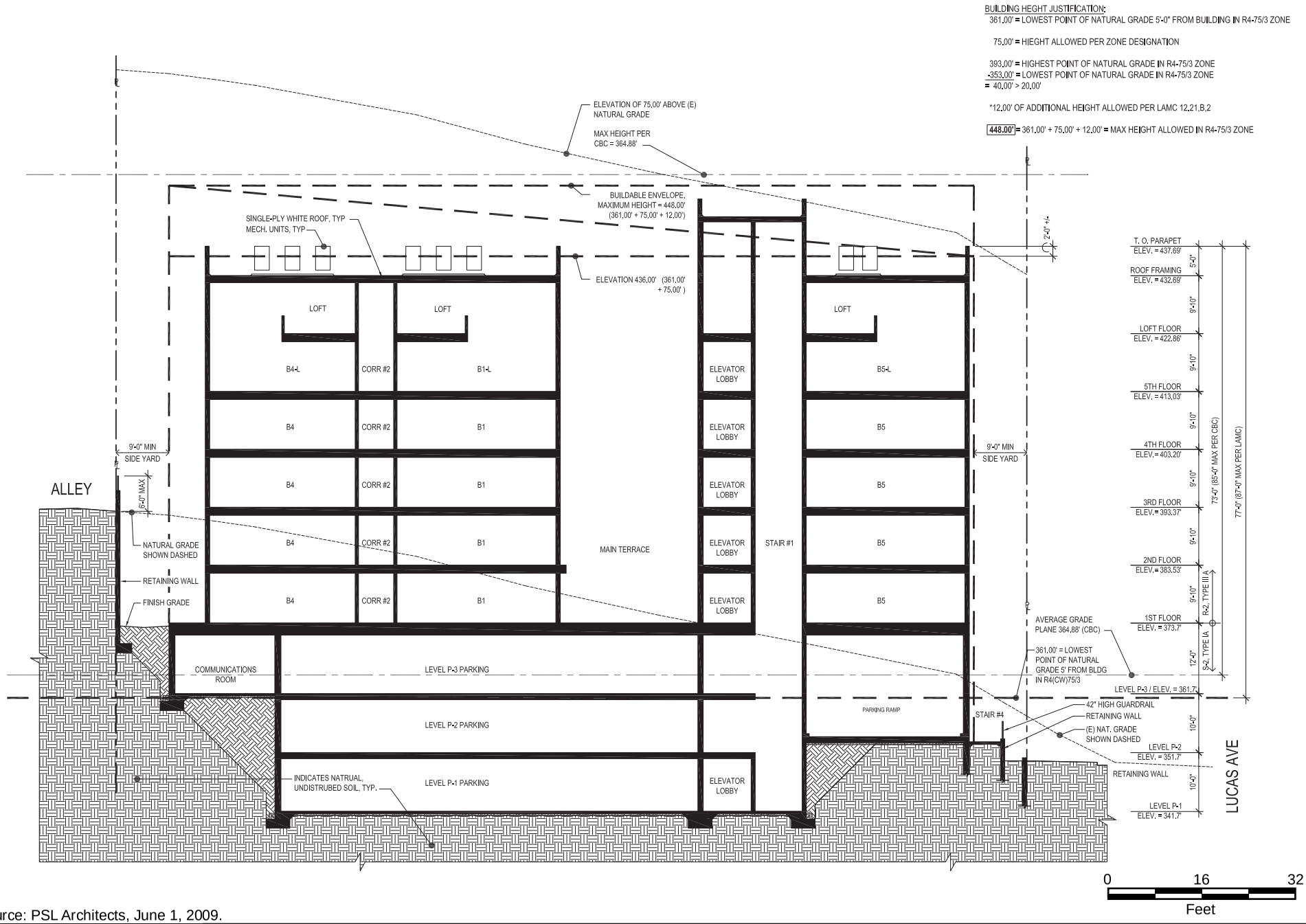
Environmental Planning and Research

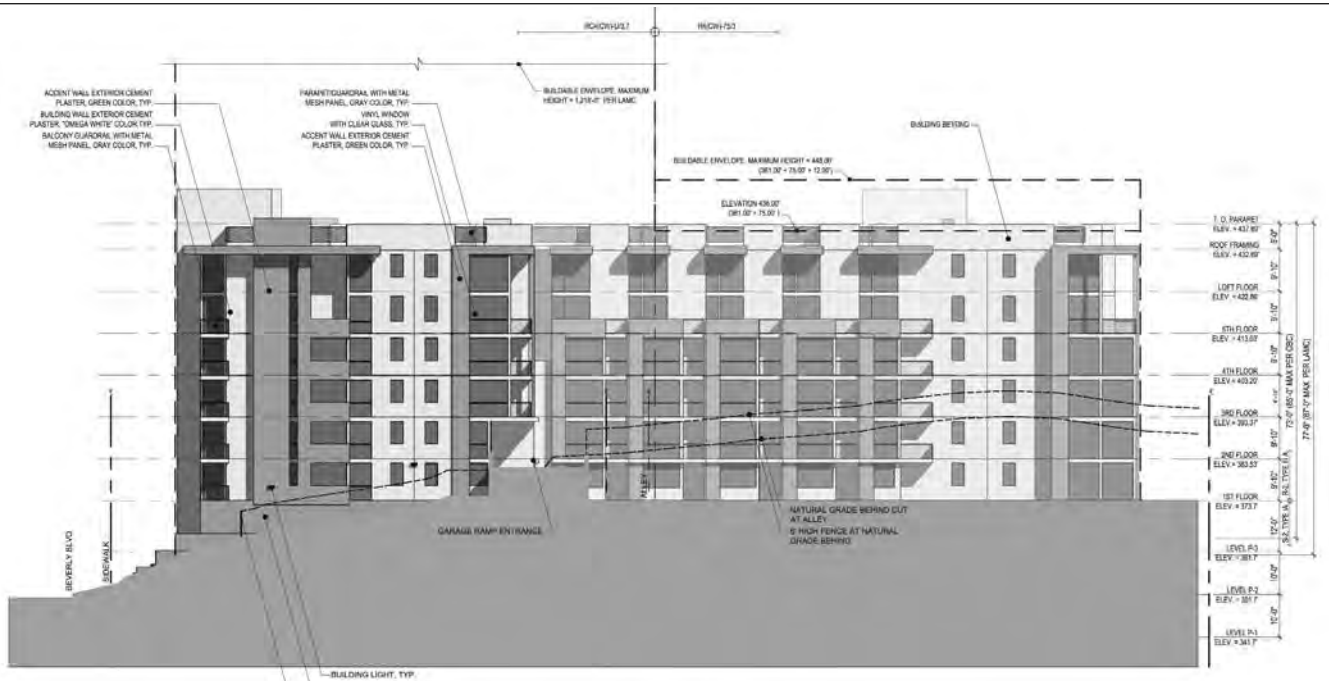
Figure II-16
North-South Building Section



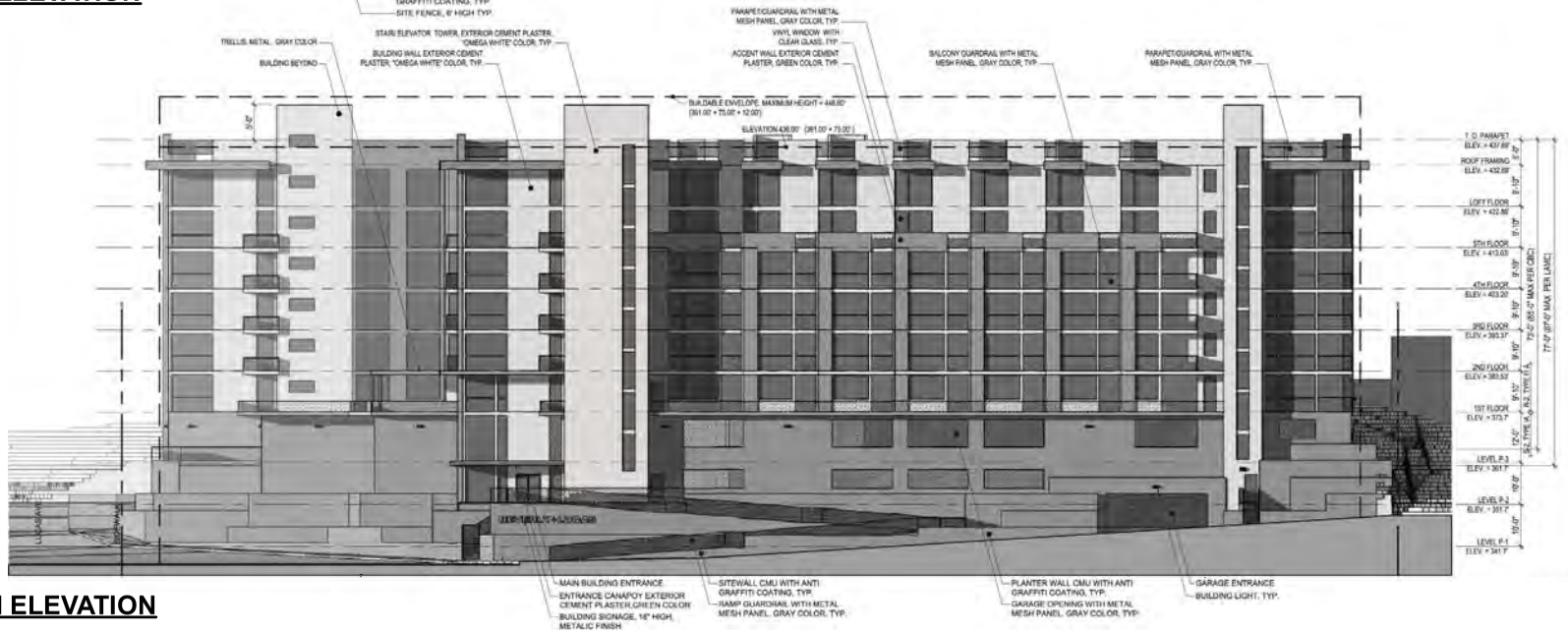
Source: PSL Architects, June 1, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-17
East-West Building Section



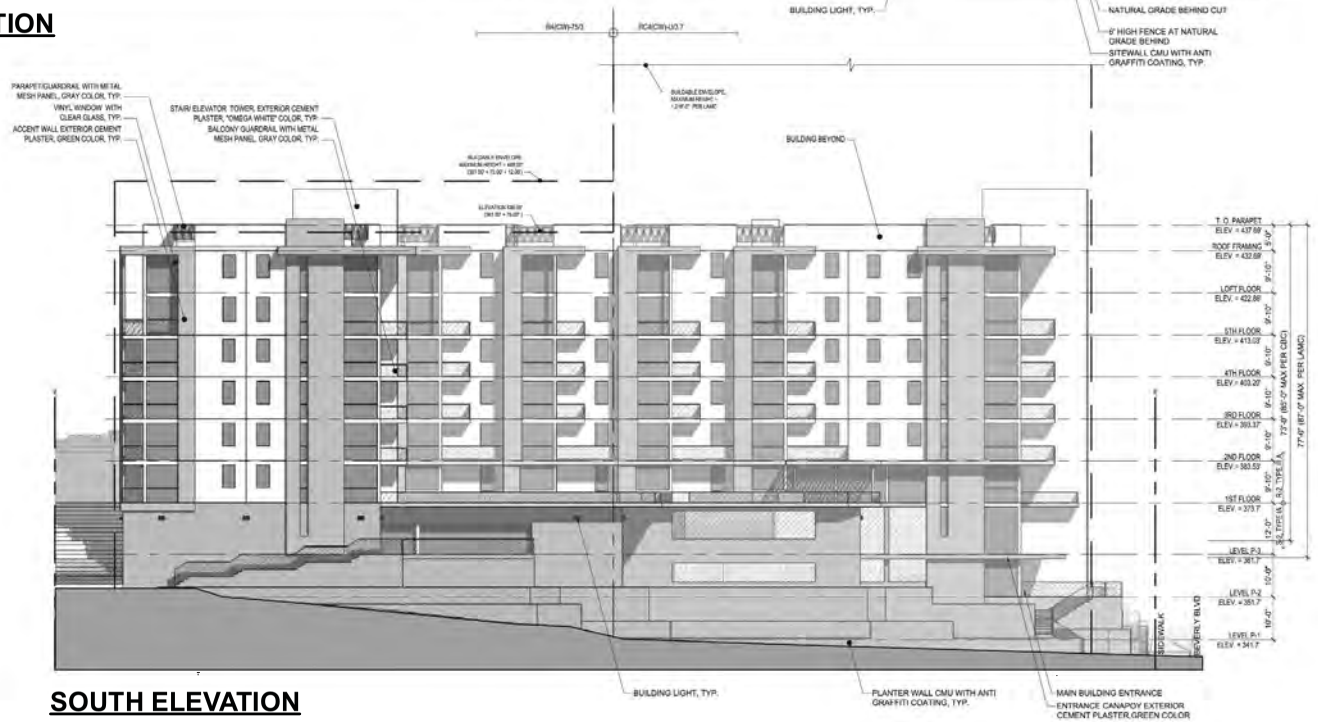
WEST ELEVATION



NORTH ELEVATION

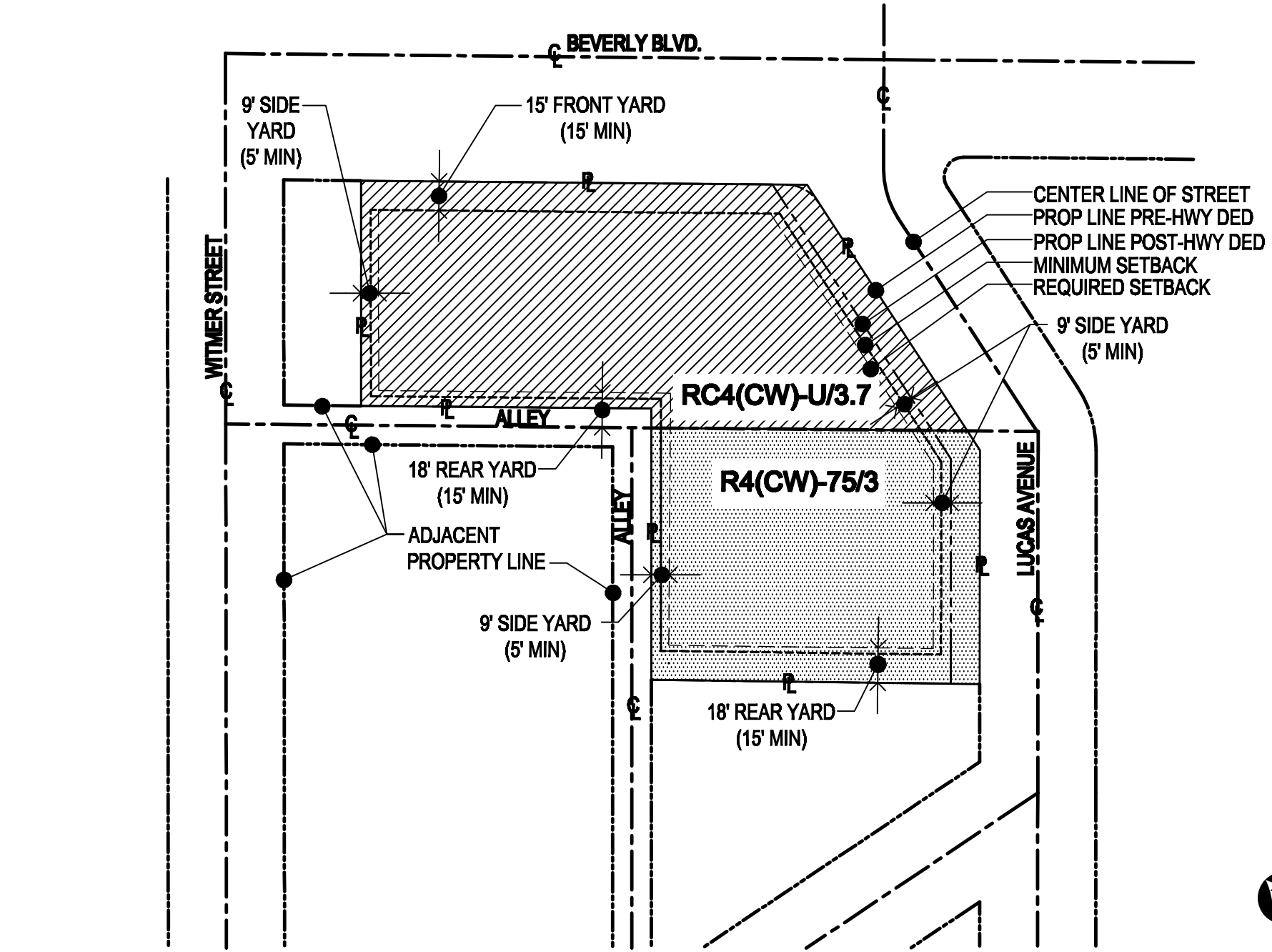
Source: PSL Architects, June 1, 2009.

WEST ELEVATION



SOUTH ELEVATION

Source: PSL Architects, June 1, 2009.



Source: PSL Architects, 02/05/09.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-20
Project Site Setback

Transit Routes

The Project area is currently served by five Metro (Los Angeles County Metropolitan Transportation Authority) and two DASH routes (the City of Los Angeles DASH service).

The transit lines serving the Project area are shown in Figure II-21, Transit Routes in the Project Area.

Metro Bus

Metro operates one Metro Rapid Bus Line past the site. Line 714 runs along Beverly Boulevard and 1st Street in the immediate vicinity of the Project site and connects Beverly Hills to Downtown Los Angeles.

Metro Line 14 also runs in the immediate vicinity of the Project site. Line 14 runs along Beverly Boulevard and 1st Street and connects Beverly Hills to Downtown Los Angeles.

Metro operates three other bus lines in the area of the Project. These include Line 10, which runs along Temple Street and connects West Hollywood and Downtown Los Angeles; Line 16/316, which run along 3rd Street and connect Century City, Hancock Park, Westlake, and Downtown Los Angeles.

City of Los Angeles - DASH

The DASH– Route F runs along 3rd Street, Beaudry Avenue, and 4th Street and connects to Exposition Park. The DASH–Pico Union/Echo Park Route runs along 3rd Street, Lucas Avenue, and 6th Street and connects to Echo Park and Washington Boulevard & Grand Avenue.

Parking

The proposed Project would provide a total of 170 parking spaces in three levels of structured parking, which is required pursuant to the SB 1818 parking requirements.

Under the City's operative parking standards (LAMC Section 12.21 A 4) for apartments, the Project would be required to provide at least one parking space for each dwelling unit of less than three habitable rooms, 1.5 parking spaces for each dwelling unit of three habitable rooms, and two parking spaces for each dwelling unit of more than three habitable rooms. As the proposed Project would provide a combination of 79 studio, 57 one-bedroom, and 17 two-bedroom dwelling units, 213 parking spaces would be required.

The City's SB 1818 ordinance (Ordinance No. 179,681) requires Housing Development Projects, such as the proposed Project, to comply with whichever of the following options requires the least amount of parking, Parking Option 1, Parking Option 2, or applicable provisions of Section 12.21 A 4 of the LAMC. Parking Option 1 of the SB1818 ordinance requires the Project Applicant to provide one on-site parking space for each studio or one-bedroom dwelling unit, two on-site parking spaces for each two- or three-bedroom dwelling unit, and 2.5 on-site parking spaces for each dwelling units of four or more bedrooms. As previously discussed, the Project would provide a combination of 136 studio and one-bedroom

dwelling units, and 17 two-bedroom dwelling units. Therefore, under these requirements, a total of 170 parking spaces would be required, of which eight would be tandem spaces (although 17 tandem spaces or 34 single parking spaces are permitted), three van-accessible spaces and three handicap accessible spaces.

Required parking for restricted affordable units under Parking Option 2 may be reduced to one parking space per restricted affordable unit with the following exceptions: 0.5 parking spaces must be provided for each dwelling unit restricted to Low and Very Low Income units for senior citizens or disabled persons and 0.25 parking spaces must be provided for each restricted affordable unit in a residential hotel. Additionally, up to 40 percent of the parking provided for the restricted affordable units may be provided by compact stalls.

Accordingly, the proposed Project's 170 parking spaces would meet the SB 1818 parking requirements of Parking Option 1.

Traffic

The Traffic Study, included as Appendix I, Traffic Data, to this Initial Study, prepared by The Mobility Group[16] confirms that the Project would not create any traffic impacts along West Beverly Boulevard, South Lucas Avenue, and surrounding streets. The Traffic Study concluded that the intersections adjacent to the Project site would operate satisfactorily with the Project when considering the amount of transit service in the Project area and that no improvements would be necessary. Furthermore, the LADOT submitted a letter on May 27, 2009 stating they had reviewed the Project Traffic Study and it adequately evaluated Project related traffic impacts on the surrounding community. The LADOT letter has been included in Appendix I, Traffic Data, to this Initial Study.

Landscaping and Open Space

As shown in Figure II-21 (First Floor Planting Plan) and Figure II-22 (Parking Level 3 Planting Plan), the landscaping concept for the Project includes various type of greenery throughout the Project site, including trees and patios. As previously noted, the Project, would involve the demolition of all existing residential and industrial uses on the Project site and the removal of associated landscaping and parking. The Specific Plan requires that one tree be provided on-site for every dwelling unit. If this cannot be accomplished, it is possible for the Project Applicant to provide at 50 percent of the required trees on-site and provide the difference off-site pursuant to Appendix D Section C 2 of the Specific Plan. The Project would provide more than half of the total number required trees (more than 87 trees [81 trees on-site and 6 trees in the parkway]), which is permitted "by right" and would pay in-lieu fees for the remainder. Common open space for the Project would include front and rear yards, main, south and north terrace, recreation room, fitness room, and outdoor swimming pool. Both the Specific Plan and the LAMC have requirements specifying the total amount of open space required for any development project.

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[16] *Traffic Study for the Beverly and Lucas Project, prepared by The Mobility Group, March 6, 2009.*

Under the LAMC and the Specific Plan, a total of 16,150 square feet of open space for the Project would be required, based on the requirements of 100 square feet of open space per dwelling unit with less than three habitable rooms, 125 square feet per dwelling unit with three habitable rooms, and 175 square feet per dwelling unit with more than three habitable rooms.[17] The LAMC does not permit the front or rear yards to count towards common open space. Also, the LAMC requires that private open space have a minimum dimension of 50 square feet and have no horizontal dimension less than six feet. Additionally, recreation rooms at least 600 square feet in area for a development of 16 or more dwelling units may qualify as open space, but may not qualify for more than 25 percent of the total required usable open space. The Project's private open space (5,575 square feet) located within the balconies does not count towards open space because the dimensions are less than required. Also, a portion of the recreation rooms do not count towards open space because they would account for more than 25 percent of the total usable open space, and therefore only a portion of the recreation rooms count, making up only 25 percent of the total usable open space. Therefore, the Project is proposing to provide 12,092 square feet of open space per the LAMC, 4,058 square feet short of what is required.

However, the Specific Plan adds an additional requirement that 100 square feet of open space per unit be common area open to all residents. This requires the Project to provide a minimum of 15,300 square feet of common open space area.

Both the LAMC and Specific Plan define where open space can be located. For example, the LAMC places a limit of 25 percent on the amount of open space that can be accommodated indoors and defines certain yards where it can be located. Meanwhile, the Specific Plan has no such limitation on interior space and permits open space to be located in other yards.[18] Based on these deferent criteria, the Project is able to count 15,958 square feet, or 192 square feet less than required, of open space.

Lighting

The Project site would be illuminated with indoor and outdoor night lighting. Security lighting would be provided along the perimeter of the structures, parking areas, in stairwells, along walkways, in open space areas, and in the hallways of the residential levels. All lighting would either be shielded and focused on the Project site or located completely indoors.

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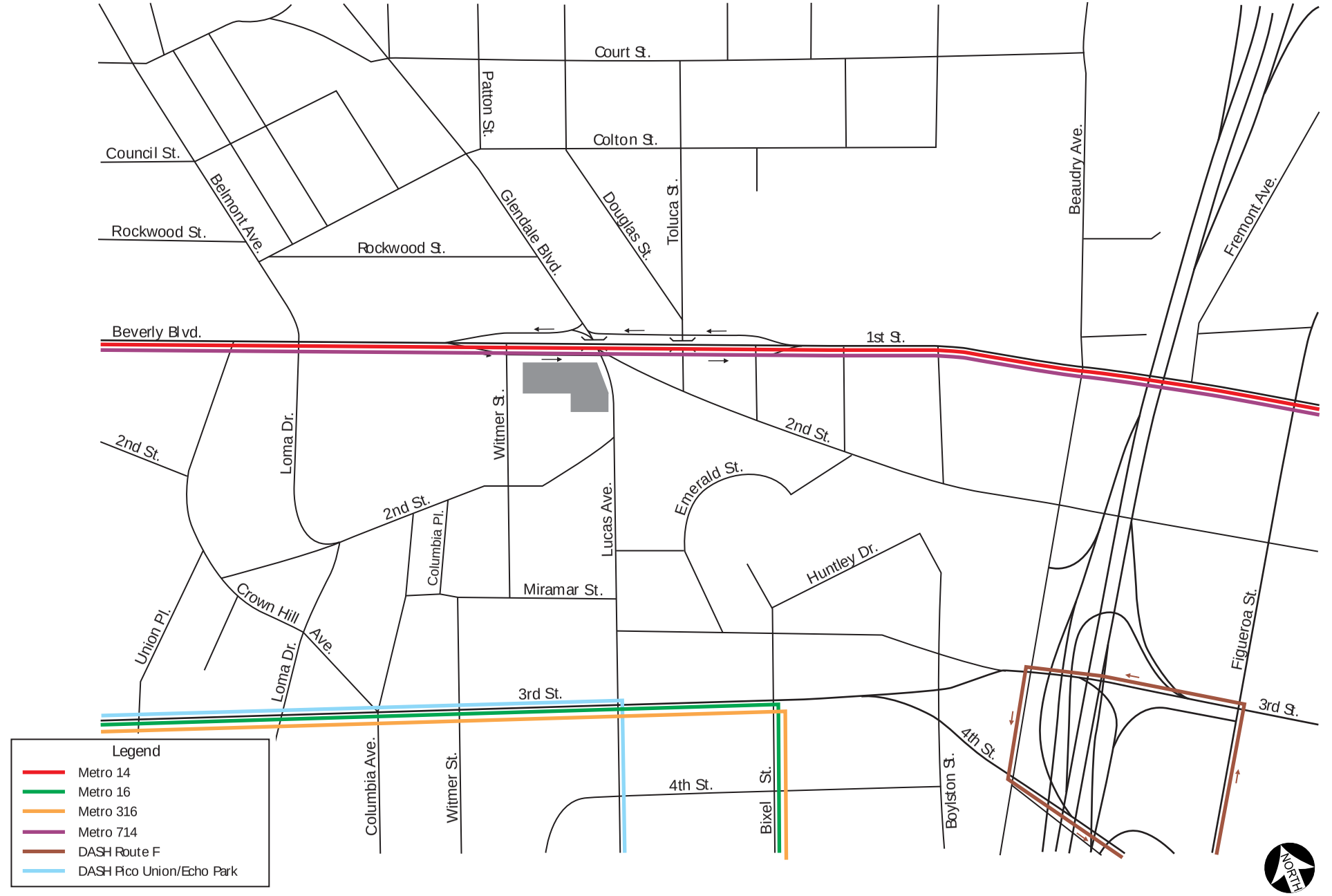
[17] *(100 sq ft/unit*127 units)+(125 sq ft/unit*22 units)+(175 sq ft/unit*4 units)=16,150 sq ft of open space.*

[18] *See Appendix D of the Central City West Specific Plan and Section 12.21 G of the LAMC.*



Source: The Mobility Group, 03/03/09.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-21
Transit Routes in the Project Area

Landscape Points		
Total square footage		50,628.00 sf
Total number of points required for site		30
Detail of points	**Points Claimed**	**Reference**
Vines on walls	8	L-1
Free flowering vines on walls	5	L-1
Street trees 24" box	8	L-1
Trees shading West side of building	10	L-1
TOTAL POINTS	31	

Water Management Points		
Total square footage of site		50,628.00 sf
Total number of points required for site		200
Detail Of Points	**Points Claimed**	
Points 2 per plant 114 plants	228	L-1
Landscape meter	50	L-2
Automatic irrigation controller	10	L-2
Rain Sensor	2	L-2
TOTAL POINTS	290	

Total square footage of site	50,628.00 sf
Total site minus structure	11,497.00 sf
Area landscaped	13,552.00 sf

SHRUBS AND GROUND COVER LEGEND

SYM.	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	REMARKS
	Bulbine frutescens		1-gal	24"oc	
	Carex divulsa	Berkeley Sedge	5-gal	31	
	Carpenteria californica	Bush Anemone	5-gal	34	
	Deschampsia cespitosa	Tufted Hair Grass	1-gal	24"oc	
	Dodonea viscosa 'Saratoga'	Hopseed Bush	15-gal	15	
	Kniphofia h. 'Alcazar'		5-gal	24"oc	
	Mahonia aquifolium	Oregon Grape	5-gal	8	
	Mahonia lomariifolia	Mahonia	5-gal	6	
	Mahonia a. 'Compacta'	Mahonia	1-gal	4'oc	
	Myrtus communis	Myrtle	5-gal	7	
	Myrtus communis 'Compacta'	Myrtle	5-gal	4'oc	
	Nandina 'Nana Puperea'	Heavenly Bamboo	1-gal	30"oc	
	Nandina d. 'Harbor Dwarf'	Heavenly Bamboo	1-gal	18"oc	
	Nandina domestica	Heavenly Bamboo	5-gal	42	
	Nassella tenuissima	Mexican Feather Grass	1-gal	24"oc	
	Parthenocissus tricuspidata	Boston Ivy	5-gal	45	
	Penstemon spectabilis	Royal Beard Tounge	1-gal	24"oc	
	Wisteria sinensis	Chinese Westeria	5-gal	1	

TREE LEGEND

SYM.	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	REMARKS
	Agonis flexuosa	Peppermint Tree	24"box	8	
	Arbutus unedo	Strawberry Tree	24"box	20	multi
	Cupressus s. 'Glauca'	Italian Cypress	15-gal	14	
	Eucalyptus citriodora	Lemon Scented Gum	24"box	16	
	Laurus nobilis	Sweet Bay	15-gal	23	
	Street tree	Per City req.	24"box	6	

All trees to be planted with commercial root barriers.
2" deep shredded Cedar bark to spread between plants.

NOTE:
1. All groundcover areas where plants are 4'oc or greater to have geotextile fabric installed 3" below finished grade w/ 3" shredded bark above to eliminate weed growth.
2. Waterproofing and drains in planters by others. For on deck planter construction detail and drain please see arch. plans.
3. There are no protected trees on site.

BEVERLY BLVD

PLANTING NOTES

1. DRAWING IS DIAGRAMMATIC: CONTRACTOR TO VERIFY ALL LOCATIONS AND CONDITIONS ON SITE. COUNT ALL PLANT MATERIAL BEFORE BIDDING.
2. CONTRACTOR TO INSPECT ALL EXISTING CONDITIONS ON SITE AND LOCATE ALL EXISTING UTILITIES BEFORE CONSTRUCTION BEGINS.
3. CONTRACTOR TO REPAIR AT HIS OWN EXPENSE ALL PROPERTY DAMAGE WHICH OCCURS DURING PROJECT INSTALLATION.
4. NOTE ADDITIONAL REMARKS ON SPECIFIC PLANTS IN PLANT LIST.
5. ALL EXISTING PLANT MATERIAL TO BE REMOVED EXCEPT WHERE NOTED ON PLAN.
6. CONTRACTOR TO GUARANTEE ALL PLANT MATERIAL FOR 90 DAYS FROM THE DATE OF ACCEPTANCE BY OWNER.
7. FINISH GRADE TO BE 1" BELOW ALL WALKS, CURBS, AND PAVING.
8. ALL PLANTED AREAS SHALL RECEIVE THE FOLLOWING AMENDMENTS PER 1,000 SQ. FT. OF SURFACE AREA. ROTO-TILL AMENDMENTS TO A DEPTH OF 6"
   - *150 LBS. GRO-POWER
   - *3 CU YDS NITROGENIZED, MINERALIZED FIR BARK OR REDWOOD SHAVINGS
   - *ADD 6 LBS OF GRO-POWER CONTROLLED RELEASE 12-8-8 PER CU YD OF MIX
9. PLANT HOLE TO BE TWICE AS WIDE AND DEEP AS THE PLANT ROOT BALL. BACKFILL AND COMPACT TO 80 % SOIL OF SITE AND 40 % FIR BARK, UNLESS OTHERWISE NOTED. PROVIDE GRO-POWER PLANT TABLETS AT THE FOLLOWING RATES:

1 GAL	2
5 GAL	5
15 GAL	10
24" BOX AND UP	14

   PLACE RECOMMENDED TABLETS BETWEEN THE BOTTOM AND THE TOP OF THE ROOT BALL BUT NO HIGHER THAN 1/3 OF THE WAY UP TO THE TOP OF THE ROOT BALL. SPACE TABLETS EQUALLY AROUND THE PERIMETER OF THE ROOT BALL APPROXIMATELY 2" FROM THE ROOT TIPS.
10. "DEEP ROOT" BARRIERS ARE TO BE USED AROUND ALL TREES LOCATION WITHIN 5 FT. OF PAVING. INSTALL PER MANUFACTURER'S SPECIFICATIONS.
11. ALL PROPOSED SHRUBS AND GROUND COVER AREAS ARE TO BE TREATED WITH A PRE-EMERGENT WEED KILLER (EPTAM / RONSTAR). APPLY PER MANUFACTURER'S SPECIFICATIONS: A) IMMEDIATELY AFTER PLANTING, B) AT THE BEGINNING OF THE MAINTENANCE PERIOD, AND C) AT THE END OF THE MAINTENANCE PERIOD.
12. CONTRACTOR TO INSTALL AND MAINTAIN LANDSCAPE PLANTING IN ACCORDANCE WITH THE GOVERNING AGENCY'S GUIDELINES AND SPECIFICATIONS UNLESS NOTED OTHERWISE IN THESE NOTES OR ON THE PLANS.

NORTH

Source: PSL Architects, June 1, 2009.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure II-22
First Floor Planting Plan

SHRUBS AND GROUND COVER LEGEND

SYM.	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	REMARKS
	Bulbine frutescens		1-gal	24"oc	
	Carex divulsa	Berkeley Sedge	5-gal	31	
	Carpenteria californica	Bush Anemone	5-gal	34	
	Deschampsia cespitosa	Tufted Hair Grass	1-gal	24"oc	
	Dodonea viscosa 'Saratoga'	Hopseed Bush	15-gal	15	
	Kniphofia h. 'Alcazar'		5-gal	24"oc	
	Mahonia aquifolium	Oregon Grape	5-gal	8	
	Mahonia lomariifolia	Mahonia	5-gal	6	
	Mahonia a. 'Compacta'	Mahonia	1-gal	4'oc	
	Myrtus communis	Myrtle	5-gal	7	
	Myrtus communis 'Compacta'	Myrtle	5-gal	4'oc	
	Nandina 'Nana Puperea'	Heavenly Bamboo	1-gal	30"oc	
	Nandina d. 'Harbor Dwarf'	Heavenly Bamboo	1-gal	18"oc	
	Nandina domestica	Heavenly Bamboo	5-gal	42	
	Nassella tenuissima	Mexican Feather Grass	1-gal	24"oc	
	Parthenocissus tricuspidata	Boston Ivy	5-gal	45	
	Penstemon spectabilis	Royal Beard Tounge	1-gal	24"oc	
	Wisteria sinensis	Chinese Westeria	5-gal	1	

TREE LEGEND

SYM.	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	REMARKS
	Agonis flexuosa	Peppermint Tree	24"box	8	
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All trees to be planted with commercial root barriers.
2" deep shredded Cedar bark to spread between plants.

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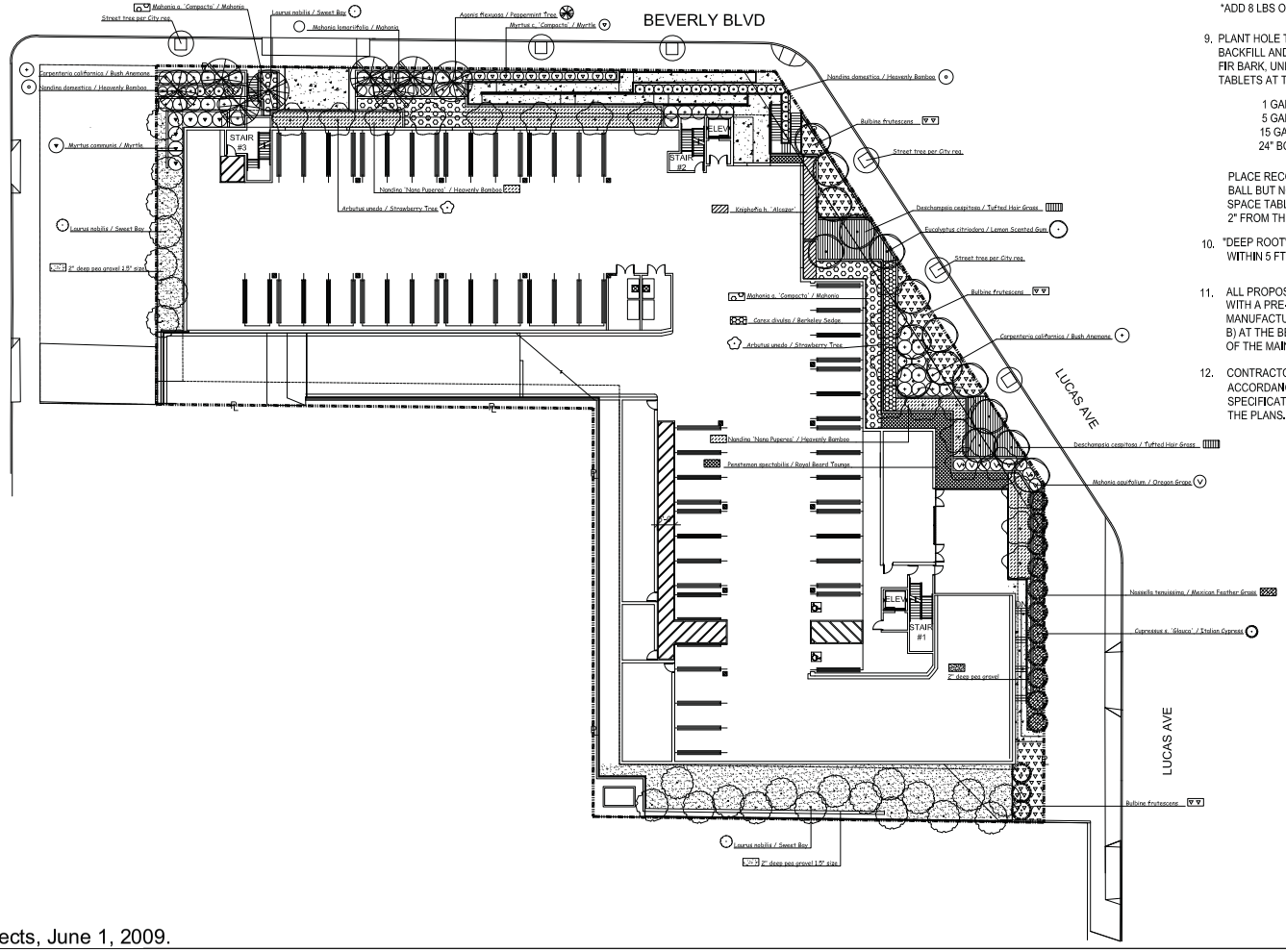

PLANTING NOTES

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12. CONTRACTOR TO INSTALL AND MAINTAIN LANSCAPE PLANTING IN ACCORDANCE WITH THE GOVERNING AGENCY'S GUIDELINES AND SPECIFICATIONS UNLESS NOTED OTHERWISE IN THESE NOTES OR ON THE PLANS.

Source: PSL Architects, June 1, 2009.

Energy

The Project is proposed to improve upon Title 24 energy efficiency standards by 14 percent. The following design features would be incorporated into the Project to minimize energy use, which would improve upon the energy efficiency of the proposed 153-unit multi-family building:

- Dual-glazed energy efficient windows and doors with a U-factor and solar heat gain coefficient which exceeds California Title 24 requirements.
- South facing balconies which reduce solar heat gain.
- Energy-efficient parking structure lights throughout the Project site.
- Energy efficient lighting comprised of compact fluorescent lamps installed in the Project.
- Light-colored roof materials used for Project buildings to reflect heat.
- Exterior walls with R-19 minimum insulation, which exceeds the R-13 Title 24 requirements.

Furthermore, the Project would meet the "Standard of Sustainability" rating system outlined in the Green Building Ordinance pursuant to Los Angeles Municipal Code Section 16.10 (Green Building Program) effective April 2008. The Project would meet the intent of the criteria for certification at the Leadership in Energy and Environmental Design (LEED®) certified level.

Water Conservation

Pursuant to the Los Angeles Department of Water and Power new development requirements of March 2008, the Project would incorporate the following series of water conservation devices and measures as applicable to increase water conservation:

- Install high efficiency toilets (1.28 gallons per flush or less, includes dual flush).
- Install high efficiency urinals (0.5 gallons per flush or less, includes waterless).
- Install faucet hardware in restrooms with a faucet flow rate of 1.5 gallons per minute or less.
- Install showerheads with a flow rate of 2.0 gallons per minute or less.
- Limit showers to one showerhead per shower stall.
- Install high efficiency clothes washers (water factor of 6.0 or less) where clothes washers are provided.
- Install high efficiency dishwashers (Energy Star rated) where dishwashers are provided.
- Install domestic water heating systems located in close proximity to point(s) of use, as feasible; use of tank-less and on-demand water heaters as feasible.
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration.

- Single-pass cooling shall be strictly prohibited.
- Install irrigation systems that meet the following requirements:
    - Weather-based irrigation controller with rain shutoff.
    - Flow sensor and master valve shutoff (large landscapes).
    - 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 plant materials.
    - Use of landscaping contouring to minimize precipitation runoff.
- The Project is mandated to use recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary).

Safety Features (Operation & Construction)

The Project would install fire protection devices deemed necessary by the Los Angeles Fire Department (LAFD). The Project would include private and public fire hydrants and any required fire hydrants would be installed and fully operational, and accepted by the LAFD prior to Project construction. Standpipe and fire suppression system connections would be incorporated into architectural and landscaping design elements where practical, and in locations accessible to fire equipment. City and emergency services would be notified of any planned road closures or restrictions on any roadways, alternative emergency routes, and detours due to construction activities of the Project.

The Project Applicant would work together with the Crime Prevention Unit of the Los Angeles Police Department (LAPD) for advice with respect to crime prevention features that may be incorporated into the design of the proposed Project during both construction and operational time periods. Crime prevention features may include construction security fencing, control of proposed parking areas, security lighting, and landscape planning and minimization of "dead-space" to eliminate areas of concealment. All crime prevention features shall be reviewed and approved by the LAPD prior to the construction of the Project. Upon completion of the proposed Project, the Project Applicant would provide the LAPD's Westlake Community Plan Area Commanding Officer with a diagram of all portions of the Project site, including access routes and any other applicable information to facilitate police response. In addition, the Project would provide 24-hour security.

Grading and Construction

Construction activities are expected to begin in late 2009. Construction of the proposed Project would occur over three phases, including demolition, grading and excavation, and construction. The demolition phase would occur over an approximately two-month period, including removal of the existing uses on site. The grading/excavation phases would occur over an approximately four-month period and would include approximately 24,089 cubic yards of excavation all of which would be exported off site, to allow for the parking levels and building foundations. Specifically, the construction process would involve the use of typical heavy construction equipment, such as excavations, cranes to lift steel framing, etc. Demolition, grading, and construction would occur over the course of approximately 16 months, with full Project buildout by 2011. The following describes the Project's proposed construction related components.

Haul Route

The proposed Project includes a haul route for the export of soil and demolition materials during construction. During Project construction, a total of approximately 24,089 cubic yards of soil would be excavated and removed from the Project site. The proposed haul route for soil export would consist of the following:

> Loaded Truck Route: Depart Project site at 1416 West Beverly Boulevard. Head southeast on Beverly Boulevard and right on West 2nd Street. Turn left on North Toluca Street and right on West 1st Street. Turn left onto North Hope Street and enter US-101 southbound. Merge east onto CA-60 Highway/Pomona Freeway to Exit 11 and turn left onto North Durfee Avenue. Turn right onto North Peck Road and left onto Workman Mill Road, then turn right to destination (2800 Workman Mill Road, Whittier, CA).
>
> Empty Truck Route: Depart 2800 Workman Mill Road, head southwest onto Workman Mill Road and turn right onto North Peck Road. Merge west onto CA-60 to exit 1C and merge onto US-101 northbound and exit onto North Grand Avenue and head southeast. Exit right onto North Grand Avenue and turn right onto West 1st Street. Turn left onto North Toluca Street and right on West Beverly Boulevard, then turn left to destination (1416 West Beverly Boulevard).

Storm Water Protection

The Project would be designed in compliance with 1) Section 402 (p) of the federal Water Pollution Control Act, or Clean Water Act (CWA); 2) Order No. 01-182 of the Los Angeles Regional Water Quality Control Board, which regulates the issuance of waste discharge requirements to Los Angeles County; 3) the County of Los Angeles Standard Urban Storm Water Mitigation Plan (SUSMP), and 4) the Los Angeles Municipal Code (LAMC). Because the grading and excavation required for the proposed Project would involve a footprint of greater than one acre, the proposed Project would be required to file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and prepare a Storm Water Pollution Prevention

Plan (SWPPP) in compliance with the Statewide General Permit for Discharges of Stormwater Associated with Construction Activity (General Permit). The SWPPP incorporates Best Management Practices (BMPs) to control erosion and to protect the quality of surface water runoff during the construction period. The owner of the Project site is required to maintain all structural or treatment control BMPs for the life of the Project.

Dewatering

During the Project's construction phase, temporary dewatering of portions of the Project site would be required to allow construction of the subterranean parking. The water is anticipated to flow from fractures in the bedrock and will likely yield low flows for a limited time. During foundation excavation, seepage would not be permitted to pond or accumulate.[19]

F. PROJECT OBJECTIVES

The proposed Project includes the development of a multi-family residential building consisting of five residential stories, 153 dwelling units, with associated amenities and three levels of parking. A total of 15 percent Project's 144 base density dwelling units, or 22 units, would be reserved for Low Income affordable units. The population is ever increasing within the Westlake area, thereby generating the need for more housing within the Community Plan Area.

The primary goal of the proposed Project is to provide a viable, contemporary, and attractively landscaped residential development that complements existing uses and transit corridors in the area and serves the needs of the Central City West Specific Plan and Greater Los Angeles areas. Additional goals and objectives of the proposed project include the following:

- To construct a well-designed, high-quality project that complements and enhances the Westlake Community Plan and Central City West Specific Plan area and implements good planning principles by providing much needed housing opportunities for those who work in the nearby Downtown area, the commercial core of the City;
- To designate a supply of residential land adequate to provide housing of the types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population;
- To reduce reliance on the automobile by providing conveniently located residential units near existing public transit stations;

[19] *Geotechnical Engineering Investigation, Geotechnologies, Inc. Consulting Geotechnical Engineers, pages 20-21, November 21, 2007 (included in Appendix F of this Initial Study).*

- To develop the site with a land use that is compatible with existing and surrounding uses, and consistent with the intent of the Westlake Community Plan and Central City West Specific Plan area;
- To improve the streetscape appearance along West Beverly Boulevard and South Lucas Avenue to make it more inviting and walkable;
- To provide affordable housing units for the increasing population in the Westlake Community; and
- To provide a well designed project consistent and compatible with the existing natural grade so as not to alter the appearance of the surrounding community.

G. DISCRETIONARY ACTIONS AND APPROVALS

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

1) Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.7 F, the Applicant requests approval of the following exceptions from the Central City West Specific Plan (Specific Plan):

   a) From Section 6.F.3.a.2 of the Specific Plan to permit a 153-unit, multi-family residential project without commercial floor area, which is otherwise required within the Specific Plan's RC4(CW) land use category.

   b) Pursuant to LAMC Section 11.5.7.F the Applicant is requesting a minor adjustment to the amount of open space provided within the Project. The Applicant is requesting permission to provide 15,958 square feet (of 192 square feet less) of open space, in lieu of the 16,150 square feet of open space requirement. Pursuant to 11.5.7 F (c) the Applicant also requests a reduction per the following request:

      (1) Pursuant to LAMC Section 11.5.7 F (c), the Applicant requests a Yard Variance from LAMC Section 12.21 G to deviate from the Open Space requirements to reduce the required open space to 12,092 square feet (or 4, 058 square feet less) in lieu of the 12,150 square feet requirement.

2) Pursuant to LAMC Section 12.24 X 26 (ZAD), the Applicant requests permission to deviate from LAMC Section 12.21 C.8.a to provide more than two retaining walls and to build retaining walls in excess of that permitted. Specifically, the Applicant is requesting permission to:

a) build up to a maximum of four retaining walls[20] in certain areas in an attempt to retain the site, while at the same time enhance the Project's pedestrian friendliness;

b) provide building walls that are eight feet tall from natural grade in the front yard; and

c) provide the height of a wall that will exceed 12 feet in the side and rear yards.

3) Pursuant to LAMC Section 12.28 (ZAA), the Applicant request the following Zoning Administrator's Adjustments:

a) A reduction in the side yard width from the required nine feet to two feet six inches for a length of approximately 20 feet along South Lucas Avenue near its intersection with West Beverly Boulevard to permit architectural elements, three canopies, and a stair with landing which provides access to the site to encroach into the side yard. .

4) Pursuant to LAMC Section 12.22 A 25 (Affordable Housing Incentives – Density Bonus),[21] the Applicant is setting aside 15 percent of the Project's total units for low income tenants for a period of 30 years. The Applicant requests the following related to this Code Section:

a) A six percent density bonus (equal to nine units) over what is permitted by right on the site in lieu of the 27.5 percent increase available to the project per LAMC 12.22 A.25 (c) (1).

b) The parking incentive outline in LAMC 12.22 A.25 (d) (1)

5) Pursuant to Section 17A.1 of the Specific Plan and LAMC Section 11.5.7 C, the Applicant requests Project Permit Compliance review.

Note: Section 17.B.1 of the Specific Plan states: "The requirements of this Section shall satisfy and take the place of the requirements of Site Plan Review (Ordinance Nos. 165,951 and 166,127)."

6) Pursuant to various sections of the LAMC, the Applicant will request approvals and permits for the Building and Safety Department and other municipal agencies for Project construction actions, including but not limited to the following: demolition, excavation, haul route, shoring, grading, foundation, building, and tenant improvements.

7) Approval pursuant to the California Environmental Quality Act (CEQA).

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[20] *Please note in most cases the Project could be LMAC compliant if it built two taller retaining walls. DCP requested that the Project provide smaller retaining walls to soften the pedestrian experience.*

[21] *Created by Ordinance 179681 effective April 15, 2008.*

This Initial Study, compliant with CEQA, intended to offer guidance for all discretionary actions associated with the proposed Project. The Initial Study is intended to cover all State, regional and/or local government discretionary approvals that may be required in conjunction with the proposed Project, whether or not they are explicitly listed. Federal, State and regional agencies that may have jurisdiction over specific activities associated with the proposed project include, but are not necessarily limited to:

- Los Angeles Regional Water Quality Board (LARWQB);
- South Coast Air Quality Management District (SCAQMD); and
- California Department of Transportation (Caltrans).

H. RELATED PROJECTS

Section 15063(b) of the State CEQA Guidelines provides that an Initial Study consider the environmental effects of a proposed project individually as well as cumulatively. Section 15355 of the State CEQA Guidelines defines cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. These include those projects which are proposed, recently approved, under construction, or reasonably foreseeable and which could produce a cumulative impact on the environment when considered in combination with the proposed Project. The following is a list of the related projects that are analyzed in the Initial Study.

Table II-1
Related Projects

No.	Location	Project Description/ Land Use	Size	Unit
1	500 block of N. Main St.	Community Building Performing Arts Plaza House Educational Center & Museum	32,000 25,000 14,100 23,700	sf sf sf sf
2	Alameda St./College St.	Artist-in-lofts Retail Office	30 5,000 20,000	du sf sf
3	2323 Olympic Blvd.	Apartments Commercial	87 70,231	du sf
4	1630 W. Olympic Blvd.	Office Uniform Sales Store	5,432 7,168	sf sf
5	Alvarado St./Wilshire Blvd.	Grocery Retail Community Facility	40,000 30,000 40,000	sf sf sf
6	1031 Olive St.	Condominiums Retail	105 4,500	du sf
7	204 Lucas Ave.	Apartments	21	du
8	1100 Wilshire Blvd.	Condominiums	460	du
9	7th St. (Between Valencia & Witmer St.)	Apartments Retail	102 4,212	du sf
10	416-432 W. 8th St./800 S. Olive St.	Apartments	110	du
11	1076 W. 6th St.	Apartments Retail	600 20,000	du sf
12	431 S. Lucas	Affordable Apartments	75	du

Table II-1
Related Projects

No.	Location	Project Description/ Land Use	Size	Unit
13	611 W. 6th St.	Office Condominiums Live/Work Condominiums	135 402	du du
14	1304 W. 2nd St.	Apartments Specialty Retail	261 6,398	du sf
15	9th/Figueroa/Flower	Condominiums Retail	629 27,000	du sf
16	San Lucas/4th St.	Condominiums	54	du
17	North of 6th St.	Office	880,000	sf
18	2515 Olympic Blvd.	Auto Sales & Parking Lot	25,880	sf
19	715 N. Yale St.	Apartments	65	du
20	Wilshire Blvd./Witmer St.	Imageing Center, Pharmacy, Surgical Suites & Physician Offices	150,000	sf
21	756 S. Spring St.	Apartments	84	du
22	450 N. Grand	Performing Arts High School Performing Arts Theater	64 1,600	classrooms seats
23	Figueroa St./Chesar Chavez	Apartments Retail	210 10,966	du sf
24	Grand Ave./12th St.	Condominiums Retail	311 7,294	du sf
25	1136 W. 6th	Apartments Retail	725 39,999	du sf
26	600 W. 7th St.	Apartments	70	du
27	Between Broadway & Hill St. and 1st St. & 2nd St.	U.S. District Courtrooms Judges Chambers Support Offices Circuit Satellite Library Parking	41 40 n/a n/a 150	courtrooms chambers n/a n/a spaces
28	2950 W. 6th St.	Hotel Condo Hotel Condominiums Retail Restaurant	80 112 165 7,500 13,000	rooms du du sf sf
29	North of 8th St. between Grand & Olive	Condominiums Retail Restaurants	875 34,061 10,000	du sf sf
30	458 S. Spring St.	Loft Apartments	209	du
31	400 Washington Blvd.	5-year Master Plan Project	n/a	n/a
32	4th St. & Main St.	Residential Lofts Retail	n/a n/a	n/a n/a
33	1200 W. Colton St.	Office Exam Facility Conference Facility	25,500 50 350	sf visitors visitors
34	1924 W. Temple St.	High-Rise Condominiums Condominiums Apartments Retail	132 73 46 19,103	du du du sf
35	Alameda St./Los Angeles St.	Office Hotel Apartments Retail Museum	8,200,000 750 300 250,000 70,000	sf rooms du sf sf
36	West of SCI-Arc at Santa Fe Ave.	Loft Apartments	300	du
37	3rd St./Santa Fe	Multi-Use Development	596,000	sf
38	375 E. 2nd St.	Apartments Retail	124 12,500	du sf

Table II-1
Related Projects

No.	Location	Project Description/ Land Use	Size	Unit
39	Civic Center	EOC/POC/FDC Metro Jail Occupational Health & Services Div. (OHSD) Fire Station #4	433 512 30,000 21	emp beds sf emp
40	648 S. Vermont	Apartments Retail	444 30,650	du sf
41	3400 W. 3rd	Condominiums Apartments Supermarket High Turnover Restaurant Retail	130 250 30,000 150,000 200,000	du du sf sf sf
42	548 S. Spring St.	Loft Apartments	157	du
43	1st/Main St.	Police Headquarters Facility (PHF) Motor Transport Division (MTD) Recreation Center Aiso St. Parking Facility	2,400 56 60,000 300	emp emp sf spaces
44	610 S. Main St.	Restaurant Retail Pool/Event	13,921 726 726	sf sf sf
45	Northwest Corner of Alvarado St./Santa Ynez St.	Elementary School	875	st
46	Cesar Chavez Ave./Broadway	Apartments Retail	280 22,000	du sf
47	325 8th St.	Live/Work Lofts	91	du
48	3 Blocks Between Los Angeles St., Maple Ave., 7th St., & 9th St.	Condominiums Apartments	80 299	du du
49	901 S. Broadway	Lofts	82	du
50	Olive/Olympic/11th	Congregate Care Facility	200	du
51	146 W. 11th	Apartments Office Retail Condominiums	20 32,670 37,600 565	du sf sf du
52	3033 W. Wilshire	Live/Work Condominiums Retail	190 5,540	du sf
53	900 N. Broadway	Condominiums Cultural Center Restaurant Retail	223 7,000 15,000 22,008	du sf sf sf
54	810 S. Spring St.	Condominiums	93	du
55	101-131 E. 6th St.	Restaurant Retail Health Club	11,018 8,927 5,066	sf sf sf
56	Temple St./Spring St.	Hall of Justice Parking Structure	30 1,000	emp spaces
57	515 W. 7th St.	Condominiums Retail	55 28,000	du sf
58	1050 Hill St.	Entertainment	33,423	sf
59	Figueroa St./11th St.	Hotel Cinema Theatre Restaurants Retail Office Apartments	1,200 3,600 7,000 345,000 498,000 165,000 800	rooms seats seats sf sf sf du

Table II-1
Related Projects

No.	Location	Project Description/ Land Use	Size	Unit
60	8th St/Francisco St.	Hotel Condominiums Office Retail	480 836 988,225 46,000	rooms du sf sf
61	2525 W. Wilshire	Condominiums Retail	118 3,000	du sf
62	1340 S. Figueroa	Condominiums Retail	273 18,000	du sf
63	3154 W. Wilshire	Condominiums Retail	464 25,000	du sf
64	456 S. Witmer	Condominiums	39	du
65	Olympic Blvd./Olive St.	Live/Work Lofts with Restaurant/Bar	78	du
66	745 S. Spring	Condominiums Retail	247 10,675	du sf
67	8th St. & Hope St., 9th St. & Flower St.	Condominiums Retail/Restaurant	939 83,700	du sf
68	1234 W. 3rd St.	Apartments Retail	363 7,740	du sf
69	1150 S. Grand Ave.	Condominiums Retail Restaurant	351 125,000 125,000	du sf sf
70	Grand Ave./11th St.	Condominiums Retail Restaurant	128 3,472 2,200	du sf sf
71	609 W. 8th	Condominiums Hotel Retail Restaurant	225 200 30,000 32,000	du rooms sf sf
72	622 Lucas St.	Condominiums	311	du
73	701 3rd St.	Bar/Lounge	8,770	sf
74	1101 Main St.	Condominiums	300	du
75	1115 S. Hill St.	Condominiums Retail	172 6,850	du sf
76	1311 W. 5th St.	Condominiums Retail	130 7,037	du sf
77	Bunker Hill/Cesar Chavez	Supermarket Retail	17,000 4,200	sf sf
78	215 W. 6th St.	Condominiums Bar	84 6,000	du sf
79	200 S. Los Angeles St.	Condominiums Apartments Retail	570 280 50,000	du du sf
80	1901 W. 7th St.	Apartments (Ph 1) Retail (Ph 1) Apartments (Ph 2) Retail (Ph 2)	90 15,500 82 17,300	du sf du sf
81	1201 1st St.	High School	1,206	st
82	1600 W. Olympic Blvd.	Gas Station with Canopy & Mini-Market (Reconstruct) *Gas Station with Canopy & Mini-Market (Demolish)*	2,046 *2,044*	sf *sf*
83	501 S. Olive St.	Condominiums Retail Restaurant	900 19,000 19,200	du sf sf
84	411 W. 5th St.	Apartments	74	du

Table II-1
Related Projects

No.	Location	Project Description/ Land Use	Size	Unit
85	1500 S. Figueroa	Condominiums Retail	213 9,500	du sf
86	110 Beaudry Ave.	Apartments Retail	204 5,000	du sf
87	801 S. Grand Ave.	Live/Work Condominiums	132	du
88	250 S. Hill St.	Condominiums Retail Restaurant Health Club	330 2,800 9,200 56,200	du sf sf sf
89	1010 Wilshire Building	Condominiums	240	du
90	Flower/7th	Condominiums	222	du
91	215 W. 6th	Condominiums	198	du
92	Block bounded by 3rd St., Olive St., Hill St., & 4th St.	Office Retail	960,000 100,000	sf sf
93	Southeast Corner of Grand/Olympic	Condominiums Retail Restaurant	331 10,000 5,985	du sf sf
94	Parcel Q and Parcel W- Bounded by 1st St., Grand Ave., Hill St., & Upper 2nd St. Parcel L/M-2 - Bounded by GTK Way, Hope St., & Upper 2nd St.	Condominiums Apartments County Office Building Retail/Restaurant/Supermarket/Healthclub Hotel	1,648 412 681,000 449,000 275	du du sf sf rooms
95	221 S. Los Angeles St.	Condominiums Retail	300 34,000	du sf
96	2nd St./Hewitt	Condominiums	118	du
97	Bounded by Hewitt, 4th, Molino, & Palmetto	Condominiums	297	du
98	8th/Broadway	Condominiums	168	du
99	1028-1044 S. Hope St.	Condominiums Retail	250 7,283	du sf
100	629 Traction Ave.	Condominiums	190	du
101	Main St. (Between 6th & 7th)	Condominiums	550	du
102	Maple/Olympic Blvd.	Retail	100,000	sf
103	7th/Figueroa St.	Office	930,000	sf
104	Wilshire/St. Paul St.	Condominiums Retail	407 7,472	du sf
105	1128 W. Ingragham St.	Condominiums Retail	334 10,000	du sf
106	850 S. Hill St.	Condominiums	190	du
107	7th St./Lucas	Condominiums Retail	130 7,030	du sf
108	650 S. Spring St. or 111 W. 7th St.	Condominiums	420	du
109	600 S. Spring St.	Condominiums	220	du
110	327 Fremont Ave.	Apartments Retail	600 30,000	du sf
111	315 W. 9th St.	Condominiums Retail	210 9,000	du sf
112	2nd St./Santa Fe Ave.	Condominiums Retail	400 20,000	du sf
113	3rd St./Beaudry	Condominiums Apartments	425 425	du du
114	1016 Towne Ave.	Wholesale Market	78,972	sf
115	1111 Wilshire Blvd.	Condominiums Retail	420 40,000	du sf

Table II-1
Related Projects

No.	Location	Project Description/ Land Use	Size	Unit
116	720 Cesar Chavez	Condominiums Retail Restaurant	272 6,431 8,000	du sf sf
117	1360-1500 Figueroa St.	Condominiums	622	du
118	1247 7th St.	Condominiums Retail	186 6,200	du sf
119	855 Figueroa Tier	Condominiums	102	du
120	819 Santee St.	Condominiums Retail	96 7,800	du sf
121	1133 Hope St.	Condominiums Restaurant	159 6,827	du sf
122	Northwest corner of Lucas/5th	Gratts Primary School	380 176	seats st
123	426 S. Spring	Condominiums Hotel Retail	96 122 15,000	du rooms sf
124	San Pedro/14th Pl./15th	Wholesale	309,000	sf
125	Pico/Stanford/14th	Wholesale	182,000	sf
126	1101 N. Main	Condominiums	318	du
127	902 W. Washington	Condominiums	160	du
128	800 E. Pico	Condominiums	131	du
129	418 S. Spring	High-Rise Condominiums Hotel Restaurant/Retail	96 122 10,000	du rooms sf
130	233 W. Washington	Apartments Retail Office	92 24,250 24,250	du sf sf
131	860 S. Olive	Condominiums Retail Restaurant	353 18,900 6,000	du sf sf
132	1340 S. Olive	Condominiums	150	du
133	800 E. 12th	Light Industry Restaurant Warehouse	3,204,887 -1,450 -23,468	sf sf sf
134	601 S. Main	High-Rise Condominiums Specialty Retail	777 25,000	du sf
		Total Rooms	**3,229**	
		Total Dwelling Units	**30,579**	
		Total Commercial Square Feet	**21,567,139**	
		Total Students	**2,257**	
		Total Classrooms	**64**	
		Total Seats	**12,580**	
		Total Courtrooms	**41**	
		Total Chambers	**40**	
		Total Parking Spaces	**1,450**	
		Total Visitors	**400**	
		Total Employees	**2,940**	
		Total Beds	**512**	

Notes:
rm = rooms, du = dwelling units, sf = square feet, st = students, emp = employees, n/a = not available

Source: The Mobility Group, March 2009.

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	*13*	*October 15, 2009*

RESPONSIBLE AGENCIES

PROJECT TITLE/NO.	CASE NO.
Beverly and Lucas Project	*ENV-2009-2036-MND*

PREVIOUS ACTIONS CASE NO.	
	❑ DOES have significant changes from previous actions. ☑ DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

See Section II – Project Description

ENVIRONMENTAL SETTING:

See Section II – Project Description

PROJECT LOCATION

The Project site is located at 1416 West Beverly Boulevard and is generally bounded by Beverly Boulevard to the north, 2nd Street to the south, Lucas Avenue to the east, and Witmer Street to the west.

PLANNING DISTRICT	STATUS:
Westlake Community Plan	❑ PRELIMINARY ❑ PROPOSED *September 16, 1997* ☑ ADOPTED date

EXISTING ZONING	MAX. DENSITY ZONING	❑ DOES CONFORM TO PLAN
RC4(CW) / R4(CW)	*3.7:1 FAR, 3:1 FAR*	
PLANNED LAND USE & ZONE	**MAX. DENSITY PLAN**	❑ DOES NOT CONFORM TO PLAN
Residential		
SURROUNDING LAND USES	**PROJECT DENSITY**	❑ NO DISTRICT PLAN
Commercial & Residential Land Uses		

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

[signature] Planning Assistant

SIGNATURE **TITLE**

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as

described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   1) Earlier Analysis Used. Identify and state where they are available for review.
   2) 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.
   3) 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:
   1) The significance criteria or threshold, if any, used to evaluate each question; and
   2) The mitigation measure identified, if any, to reduce the impact to less than significance.

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." All potentially significant impacts have been mitigated to a less than significant level as indicated by the checklist on the following pages.

☒ Aesthetics	☒ Hazards & Hazardous Materials	☒ Public Services
❑ Agricultural Resources	❑ Hydrology/Water Quality	☒ Recreation
❑ Air Quality	❑ Land Use/Planning	☒Transportation/Traffic
❑ Biological Resources	❑ Mineral Resources	☒Utilities/Service Systems
☒ Cultural Resources	☒Noise	❑ Mandatory Findings of Significance
☒Geology/Soils	❑ Population/Housing	

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

☞ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER**
Christopher A. Joseph and Associates	*(310) 473-1600*

PROPONENT ADDRESS

11849 W. Olympic Boulevard, Suite 101, Los Angeles, CA 90064

AGENCY REQUIRING CHECKLIST	***DATE SUBMITTED***
City of Los Angeles, Department of City Planning	*October 15, 2009*

PROPOSAL NAME (If Applicable)

Beverly and Lucas Project

☞ **ENVIRONMENTAL IMPACTS** (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS.** Would the project:				
a.	Have a substantial adverse effect on a scenic vista?	❑	❑	■	❑
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	❑	❑	■	❑
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	❑	❑	■	❑
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	❑	■	❑	❑
II.	**AGRICULTURAL RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	❑	❑	❑	■
b.	Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	❑	❑	❑	■
c.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	❑	❑	❑	■
III.	**AIR QUALITY.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a.	Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	❑	❑	■	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	❑	❑	■	❑
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard?	❑	❑	■	❑
d.	Expose sensitive receptors to substantial pollutant concentrations?	❑	❑	■	❑
e.	Create objectionable odors affecting a substantial number of people?	❑	❑	■	❑

IV. BIOLOGICAL RESOURCES.

Would the project:

a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?	❑	❑	❑	■
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?	❑	❑	❑	■
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	❑	❑	❑	■
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	❑	❑	❑	■
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	❑	❑	■	❑
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	❑	❑	❑	■

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	**CULTURAL RESOURCES:** Would the project:				
a.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	❑	❑	❑	■
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	❑	■	❑	❑
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	❑	■	❑	❑
d.	Disturb any human remains, including those interred outside of formal cemeteries?	❑	❑	■	❑
VI.	**GEOLOGY AND SOILS.** Would the project:				
a.	Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :	❑	❑	❑	❑
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	❑	❑	■	❑
ii.	Strong seismic ground shaking?	❑	■	❑	❑
iii.	Seismic-related ground failure, including liquefaction?	❑	❑	❑	■
iv.	Landslides?	❑	❑	❑	■
b.	Result in substantial soil erosion or the loss of topsoil?	❑	❑	■	❑
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	❑	❑	■	❑
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	❑	❑	■	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	❑	❑	❑	■
VII.	**HAZARDS AND HAZARDOUS MATERIALS. Would the project:**				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	❑	❑	■	❑
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	❑	■	❑	❑
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	❑	❑	■	❑
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	❑	❑	■	❑
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	❑	❑	❑	■
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	❑	❑	❑	■
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	❑	❑	■	❑
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?	❑	❑	❑	■

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	❑	❑	■	❑
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	❑	❑	■	❑
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	❑	❑	■	❑
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?	❑	❑	■	❑
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	❑	■	❑	❑
f.	Otherwise substantially degrade water quality?	❑	❑	❑	■
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	❑	❑	❑	■
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	❑	❑	❑	■
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	❑	❑	❑	■
j.	Inundation by seiche, tsunami, or mudflow?	❑	❑	■	❑
IX.	**LAND USE AND PLANNING**. Would the project:				
a.	Physically divide an established community?	❑	❑	❑	■

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	❑	❑	■	❑
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	❑	❑	❑	■
X.	**MINERAL RESOURCES**. Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	❑	❑	❑	■
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	❑	❑	❑	■
XI.	**NOISE.** Would the project:				
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	❑	■	❑	❑
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	❑	■	❑	❑
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	❑	❑	■	❑
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	❑	❑	■	❑
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	❑	❑	❑	■
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	❑	❑	❑	■

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XII.	**POPULATION AND HOUSING**. Would the project:				
a.	Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	❑	❑	■	❑
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	❑	❑	❑	■
c.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	❑	❑	❑	■
XIII.	**PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a.	Fire protection?	❑	❑	■	❑
b.	Police protection?	❑	■	❑	❑
c.	Schools?	❑	■	❑	❑
d.	Parks?	❑	■	❑	❑
e.	Other governmental services (including roads)?	❑	■	❑	❑
XIV.	**RECREATION.**				
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	❑	■	❑	❑
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	❑	❑	■	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XV.	**TRANSPORTATION/CIRCULATION**. Would the project:				
a.	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)?	❑	❑	■	❑
b.	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	❑	❑	■	❑
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	❑	❑	❑	■
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	❑	❑	■	❑
e.	Result in inadequate emergency access?	❑	❑	■	❑
f.	Result in inadequate parking capacity?	❑	❑	❑	■
g.	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	❑	❑	■	❑
XVI.	**UTILITIES.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	❑	❑	❑	■
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	❑	❑	■	❑
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	❑	❑	■	❑
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	❑	❑	■	❑
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand	❑	❑	■	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	in addition to the provider's existing commitments?				
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	❑	■	❑	❑
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	❑	❑	■	❑
XVII.	**MANDATORY FINDINGS OF SIGNIFICANCE.**				
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	❑	❑	❑	■
b.	Does the project have impacts which are individually limited, but cumulatively considerable?("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	❑	❑	■	❑
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	❑	❑	■	❑

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

PREPARED BY	TITLE	TELEPHONE #	DATE

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IV. ENVIRONMENTAL IMPACT ANALYSIS

The following analysis provides the supporting documentation for the determinations presented in the City of Los Angeles' Initial Study and CEQA Environmental Checklist. Each response evaluates how the proposed Beverly and Lucas Project (as defined in Section II, Project Description), herein referred to as "Project" or "proposed Project", may affect the existing environmental conditions at the Project site and the surrounding environment.

1. AESTHETICS

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

Less Than Significant Impact. A significant impact would occur if the proposed Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks 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). Scenic vistas may include panoramic views of natural features, striking or unusual terrain, or unique urban or historic features. Under the City of Los Angeles CEQA Thresholds Guide, a significant impact occurs when a proposed project would adversely affect the public view of a scenic vista. Public views are those which can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those which can be seen from vantage points located on private property. Private views are not considered to be impacted when interrupted by land uses on adjacent blocks, specifically if the project complies with the zoning and design guidelines applicable to the site. For the purposes of this analysis, locations that may have the potential to be negatively impacted by view blockage would include public spaces such as parks, plazas, roadways, or a large number of private viewpoints such as a neighborhood or the entirety of a multiple-family residential building.

The Project site is located northwest of Downtown Los Angeles at the corner of West Beverly Boulevard and South Lucas Avenue. As discussed in Section II, Project Description, of this Initial Study, the existing visual character of the surrounding locale is highly urban and is characterized by a dense combination of educational, commercial and residential land uses (refer to Figures II-5 and II-6, Views of Surrounding Land Uses). The Project site is currently developed on varying topography with one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, vacant land, and an industrial building (refer to Figures II-3 and II-4, Views of the Project Site). The proposed Project would involve the demolition of all existing structures on site, and the construction of one new structure on site—a residential building comprised five residential stories, 153 for-rent dwelling units with associated landscaping, amenities, and three levels of

under-structure parking.[1] The Project site itself does not contain any unique scenic vistas. The Hollywood Hills are located approximately seven miles northwest of the Project site and are not visible from the site. The closest visual resource in the area of the Project site with the potential to be considered scenic is the skyline of Downtown Los Angeles, located approximately 1.5 miles southeast of the Project site.

The visibility of the Project site from off-site locations is dependent on the surrounding topography, weather conditions, and the observation point in relation to the Project site. Public and private views looking south and east towards the Downtown Los Angeles skyline, from areas north and west of the Project site that would potentially have a line of sight to the Downtown skyline, are already obstructed or constrained by existing multiple-story development. In addition, the topography of the area surrounding the Project site is dominated by varying and moderately inclined terrain. What can be seen from the Project site consists of roadways (including the Beverly Boulevard/West 1st Street Overpass) commercial uses, and single- to multiple-story buildings, including single- and multi-family residences. The closest public parks in the area are MacArthur Park on West 6th Street and South Alvarado Street (located approximately 0.85 miles southwest of the Project site), Everett Park on Everett and Sunset Boulevard (located approximately 1.5 miles northeast from the Project site) and Echo Park on Bellevue Avenue and Echo Park Avenue (located approximately 1.5 miles north of the Project site). Distance of separation, existing development, and the Beverly Boulevard/West 1st Street Overpass directly north of the Project site, create visual barriers for these parks and neighborhoods to the north. Residential uses within the vicinity of the Project site do not currently enjoy panoramic views towards the Downtown skyline due to grade differences, the roadway overpass and the multi-story development in the immediate and surrounding area.

The range of heights associated with the proposed Project would be greater than the existing uses located on the Project site. The proposed Project would be visible from some structures within the immediate vicinity of the Project site. A motorist traveling east on the Beverly Boulevard/West 1st Street Overpass, that passes over West 2nd Street, would have a brief passing glimpse of the proposed Project to their right; however, the Project site is not located within the viewshed of the Downtown skyline. Furthermore, recent redevelopment with increased height and massing has occurred on lands in the proximity and adjacent to the Project site.

In conclusion, the development of the proposed Project would not introduce incompatible elements that would block scenic views of the Downtown Los Angeles skyline from public or private vantage points. The proposed Project would not have a substantial adverse effect on any existing public or private views of a scenic vista, and therefore would have a less than significant impact and no mitigation measures are required.

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[1] *The proposed Project would be considered a "six-story" building per the LAMC and CBC. While the Project would contain five stories of residential development and three levels of under-structure parking, only one of the parking levels is considered a "story" pursuant to the LAMC and CBC.*

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

Less Than Significant Impact. A significant impact would occur only if a scenic resource would be damaged or removed by the Project within a City or State designated scenic highway or corridor.

As discussed in Response 1(a) above, the Project site is currently developed with one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, vacant land, and an industrial building. The proposed Project would involve the demolition of all existing structures and the removal of associated landscaping and parking on site, and the construction of one new structure on site—a residential building comprised of five residential stories, 153 for-rent dwelling units with associated landscaping, amenities, and three levels of under-structure parking.

Regional access to the Project site is provided by the Hollywood Freeway (US-101), located less than one mile north of the Project site, and the Harbor Freeway (I-110), located less than one mile west of the Project site. In addition, a network of Class II Major Highways, collector, and local roadways, including West Beverly Boulevard to the north, South Witmer Street to the west, South Lucas Avenue to the east, and West 2nd Street to the south, would provide local access to the Project site. No City or State designated scenic highways or corridors are located adjacent to or within the area of the Project site.[2]

Furthermore, the existing visual character of the surrounding locale is highly urban and does not contain natural scenic qualities or cultural, historical or aesthetic value that merits protection or enhancement. There are no scenic resources on the Project site. There are no rock outcroppings and the on-site existing vegetation consists of annual grasses, small shrubs, and mature trees. The Project site is interspersed with vegetation and the steep hill on Beverly Boulevard is densely covered with foliage. A Tree Survey prepared for the Project site by Christopher A. Joseph & Associates on August 19, 2008 identified nine trees which meet the City's trunk diameter criterion; however, the trees on the Project site are all ornamental-exotic, non-native species and have either been planted as part of the landscape development or have colonized the site. No protected tree species as defined under LAMC Ordinance 177,404 were observed on the Project site. The proposed Project would replace more than half of the total number required trees, which is permitted "by right" and would pay in-lieu fees for the remainder. A copy of the Tree Survey is included in Appendix D to this Initial Study.

In addition, a Historic Resource Report prepared for the Project site by Christopher A. Joseph & Associated on September 19, 2008 concluded that none of the buildings on the Project site are historic resources subject to CEQA. None of the buildings are currently designated as landmarks at the national,

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[2] *California Department of Transportation, Officially Designated State Scenic Highways, California Scenic Highway Program, website: http://www.dot.ca.gov/hq/LandArch/scenic/schwy1.htm, July 8, 2008; and City of Los Angeles, Transportation Element of the General Plan, Scenic Highways in the City of Los Angeles, Map E, June 1998, website: http://cityplanning.lacity.org/cwd/gnlpln/transelt/TEMaps/E_Scnc.gif, July 8, 2008.*

state, or local levels, nor have they been identified as significant in a historic resource survey. None of the buildings appear to qualify for listing in the California Register for lack of historical significance, architectural distinction, and physical integrity. A copy of the Historic Resource Report is included in Appendix E to this Initial Study.

As mentioned in Response 1(a) above, the existing visual character of the surrounding locale is highly urban and is characterized by a dense combination of educational, commercial and residential land uses. There are no City or State designated scenic highways or designated community byways in the vicinity of the Project site. In addition, the proposed Project would not result in the damage or removal of one or more features that contribute to the valued aesthetic character or image of the neighborhood, community, or localized area. Therefore impacts would be less than significant 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. A significant impact may occur if the proposed Project introduces incompatible visual elements on the Project site or visual elements that would be incompatible with the character of the area surrounding the Project site.

In addition to the major transportation corridors of the West Beverly Boulevard Bridge to the north over South Lucas Avenue and Glendale Avenue, West 1st Street, West 2nd Street and the Harbor Freeway to the east, the general visual quality of the Project site and area is characterized by complex roadway intersections, educational, commercial and residential uses. The buildings surrounding the Project site range from older low-rise buildings to newer mid-rise complexes. The existing buildings vary in age and architectural type and are not closely associated or identified with a particular architectural style or period.

One- and two-story commercial buildings, interspersed with surface parking lots, are located across West Beverly Boulevard directly north of the Project site. A two- to three-story large residential development is directly east of the Project site across South Lucas Avenue. Single- and multi-family residential buildings are located adjacent and to the south of the Project site, including a six-story apartment building between the east-west alley and South Witmer Street. An existing two-story residential building is located adjacent to the west of the Project site, and further west across South Witmer Street is Belmont High School.

The Project site currently has two zoning designations under the Central City West Specific Plan (Specific Plan).[3] The northern portion of the Project site is zoned as RC4(CW)-U/3.7, while the southern portion is zoned as R4(CW)-75/3. As set forth by the Specific Plan, the "RC4" component indicates that

[3] *City of Los Angeles Department of City Planning, General Plan, Community Plans, Specific Plans, Central City West, website: http://cityplanning.lacity.org/, July 10, 2008.*

the northern portion of the Project site is zoned for "Residential and Commercial Mixed Use," while the "R4" component indicates that the southern portion of the Project site is zoned for "Multiple Dwelling Use." Furthermore, the "-U/3.7" and "-75/3" components represent the maximum permitted height of structures within the zone (in feet) and the maximum permitted Floor Area Ratio (FAR). For the portion of the Project site fronting West Beverly Boulevard north of the east-west alley, the maximum height permitted is 1,218 feet above mean sea level, and the FAR is 3.7:1. For the portion of the Project site fronting South Lucas Avenue south of the north-south alley, the maximum permitted height is 75 feet, and the FAR is 3:1. Furthermore, under Section 12.21.1 B 2 of the LAMC permits an additional 12 feet in height due to the site's existing steep slope of greater than 20 feet. Therefore, a maximum height of up to 87 feet is permitted; however the Project is only proposing a maximum of 78 feet in height or 437 feet above mean sea level.

Even though the proposed Project would be consistent with the permitted building heights, the proposed Project could alter the visual character of the Project site with the construction of a six-story multi-family residential building with associated landscaping, amenities, and under-structure parking. The proposed Project would provide a total of 153 multi-family dwelling units and would offer a variety of amenities for residents, including a lobby, fitness room, recreation room, swimming pool and open space. Parking for Project residents would be provided within three structured-parking levels, which would contain a total of 170 total parking spaces and would be located under the five residential levels. There is no commercial component associated with the Project. Figures II-10 through II-15 in Section II, Project Description of this Initial Study, illustrates the Project's site plan and five proposed residential levels.

While the proposed Project would develop the site with taller structures than currently exist on the Project site, the Project would not exceed the established height requirements as described above. The proposed Project is located in an area planned for taller more intense development where recent redevelopment adjacent to the Project site has increased building height and massing. The proposed Project would be at a scale comparable to these recently developed multi-family residential uses. The proposed Project would be visible from some structures within the immediate vicinity of the Project site and would implement design features that are visually compatible with the urban context of the surrounding uses and new development in the area. Design features such as façade breaks, canopies and a variety of building materials would be incorporated to soften the increased massing of scale of the Project. In addition, the proposed Project would be required to submit a landscape plan to the Los Angeles Department of City Planning for review and approval prior to the issuance of grading permits.

Considering the recent redevelopment in the area and the proposed Project's required compliance with Design Standards and Guidelines, the proposed Project would not constitute an incompatible element to the existing visual character of the Project vicinity, and therefore, would have a less than significant impact and no mitigation measures are required.

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

Light and Glare

Less Than Significant Impact with Mitigation. A significant impact may occur if the Project introduces new sources of light or glare on the Project site which would be incompatible with the areas surrounding the Project site or which pose a safety hazard, such as to motorists utilizing adjacent streets.

The Project site is located in a well-lit urban area of the City of Los Angeles (City) where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, and indoor building illumination (light emanating from the interior of structures which passes through windows), all of which are common to densely populated areas. In addition, a high level of nighttime lighting is generated due to the Project site's location along West Beverly Boulevard, which is a classified Class II Major Highway.

The Project is proposed to improve upon Title 24 Building Energy Efficiency Standards by 14 percent. The Project site would be illuminated with indoor and outdoor night lighting. Security lighting would be provided along the perimeter of the structures, parking areas, in stairwells, along walkways, in open space areas, and in the hallways of the residential levels. All lighting would either be shielded and focused on the Project site or located completely indoors. Illumination already exists at the Project site with the existing multi-family residential uses, and the proposed Project would not introduce significantly more light into the Project area with construction of a new multi-family five residential-story building with associated landscaping, amenities, and three levels of under-structure parking. Illuminated areas would be localized and would minimize light trespass and spill. The majority of lighting would be directed towards the interior of the Project site and directed away from the neighboring residential land uses. Further, the proposed building would incorporate a variety of materials that would minimize the transmission of light from the building interior.

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, exterior building windows, and surfaces of brightly painted buildings in the Project vicinity. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area. The proposed Project includes glass windows, which could result in some transitory conditions of glare during the day. Overall, the building materials used would not be expected to cause glare that would be visually inconsistent with surrounding land uses, or to result in a substantial increase in glare that would affect nearby sensitive uses. Development of the proposed Project would include architectural features and façades that have a low level of reflectivity. The proposed Project would eliminate the existing source of glare from windshields of parked cars by moving the on-site parking to the three subterranean parking levels.

As the proposed Project would increase the amount of development on the Project site, Project implementation would incrementally increase the amount of nighttime lighting to the Project site over existing conditions. However, the proposed Project would comply with LAMC Section 93.0117 which states that no exterior light source may cause more than two footcandles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas on any other property containing a residential unit or units. Nevertheless, potential environmental impacts to residential properties adjacent to the Project site may result due to increased illumination and glare from the Project site. For instance, increased nighttime illumination may result from the increase of residential land uses and from vehicle headlights entering and exiting the Project site. Impacts associated with light and glare would be reduced to a less than significant level with implementation of the mitigation measures below.

Mitigation Measures

1-1 Outdoor lighting shall be designed and installed with downcast shielding, so that the light source cannot be seen from adjacent residential properties.

1-2 The exterior of the proposed buildings shall be constructed of non-reflective materials such as tinted non-reflective glass, metal panel, and pre-cast concrete, stucco, or fabricated wall surfaces.

Shade and Shadow

Less Than Significant Impact. The analysis of shade or shadow impacts refers to the potential blockage of direct sunlight by project buildings that may affect adjacent properties. The City of Los Angeles Draft Citywide CEQA Thresholds Technical Guide defines "shadow sensitive uses" as facilities and operations that are sensitive to the effects of shading, which include but are not limited to routinely useable outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. A shadow impact would be considered significant if shadow sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. (between early April and late October).

The Project site is currently developed on varying topography with one- and two-story structures. The range of height associated with the proposed Project would be greater than the existing uses located on the Project site. The proposed Project would involve the construction of a five residential-story building with associated landscaping, amenities, and three levels of under-structure parking. Shade/shadow graphics were prepared for the Project site by Christopher A. Joseph and Associates on March 12, 2009. 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. Shadows are shown for both solstices and equinoxes. The spring equinox and the winter solstice figures display shading for the hours of 9:00 a.m., 12:00 p.m., and

3:00 p.m. Pacific Standard Time. The summer solstice and fall equinox figures display shading for the hours of 9:00 a.m., 1:00 p.m., and 5:00 p.m. Pacific Daylight Time. The shade/shadow graphics (Figures 1-12) are included in Appendix B, Aesthetics Data, to this Initial Study.

The proposed Project's structure would cast shadows on surrounding properties that lie to the west, north and east of the Project site. To the west of the Project site, land uses that may be considered shadow sensitive would include the two-story residential structure (nestled in existing trees), the recently developed six-story apartment building, a few single- and/or multi-family residential units, and Belmont High sports courts. To the north of the Project site and across the West Beverly Boulevard two-level bridge are commercial uses; however, the uses are not pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; or existing solar collectors. To the east of the Project site, the recently developed two- to three-story multi-family residential structures would be considered shadow sensitive.

As illustrated in the shade/shadow graphics, the Project would not cast shadows on any shadow sensitive uses for longer than three hours between the hours of 9:00 a.m. and 3:00 p.m. (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. (between early April and late October). Project-related impacts associated with shade and shadow will be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. According to the City of Los Angeles CEQA Thresholds Guide, a significant cumulative aesthetic impact would occur if any of the related projects would "result in the removal, alteration, or destruction of similar aesthetic features as the proposed Project, and/or would add structural or other features that would contrast conspicuously with the valued aesthetic character of the same area as the project."[4] Implementation of the proposed Project in combination with other projects in the vicinity would result in the further infilling or improvement of existing urban land uses in the City. Development of the related projects is expected to occur in accordance with adopted plans and regulations. While many of the related projects and the proposed Project may be visible from public and private properties, the combination of the related projects and the proposed Project would not significantly obstruct existing public scenic views. Of the 134 related projects, only the recently developed North West Gateway project (east of the Project site) would potentially be located within the same viewshed as the Project site. However, the North West Gateway project is situated at a lower grade and has fewer story levels, and similar to the proposed Project, would not contribute to an obstruction of scenic views. The remaining related projects would not be capable of combining with the proposed Project to create a cumulative impact to scenic views. With respect to scenic highways, there are no City or State designated scenic highways or corridors identified in the vicinity of the proposed Project. With respect to potential light/glare and shade/shadow impacts, each related project would be required to

[4] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, page L.1-5.*

determine whether its development would result in impacts to these areas, and mitigation measures would be adopted where necessary. In terms of the overall visual quality of the surrounding neighborhoods, each of the related projects would be required to submit a design plan, 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. Therefore, cumulative impacts with respect to aesthetics would be less than significant and no mitigation measures are warranted.

2. AGRICULTURE

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. 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 vicinity is completely developed with residential and commercial uses as well as transportation corridors in a highly developed area of the City of Los Angeles and does not include any State-designated agricultural lands. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project site is not designated as "Prime Farmland", "Unique Farmland", or "Farmland of Statewide Importance", but is rather designated as "Urban and Built-up Land."[5] Therefore, the proposed Project would have no impact related to the conversion of prime farmland, unique farmland or farmland of statewide importance to a non-agricultural use and further analysis of this issue is not warranted.

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

No Impact. 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 zoned RC4(CW)-U/3.7 (Residential/Commercial Mixed Use) and R4(CW)-75/3 (Multiple Dwelling Residential) under the Central City West Specific Plan and is not zoned or utilized for agriculture. Additionally, the Project site is not subject to a Williamson Act Contract. Therefore, the proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract and no impact would occur. Further analysis of this issue is not warranted.

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[5] *California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Important Farmland in California, 2004, website: http://www.conservation.ca.gov/dlrp/fmmp/products/Pages/FMMP-MapProducts.aspx, July 9, 2008.*

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use. As discussed above, the Project site is located in an urbanized area and neither the Project site nor the surrounding properties are zoned or utilized for agricultural activities. Therefore, implementation of the proposed Project would not result in an impact associated with the conversion of farmland to a non-agricultural use and no impact would occur. Further analysis of this issue is not warranted.

Cumulative Impacts

No Impact. The proposed Project and the related projects identified in Section II, Project Description, of this Initial Study are located in a highly urbanized area of Los Angeles. None of the 134 related projects contain any land that is designated as Farmland, zoned or currently utilized for agricultural use. Therefore, development of the proposed Project in combination with the related projects would not result in the conversion of agricultural land from agricultural use to a non-agricultural use and no cumulative impacts to agricultural resources would occur.

3. AIR QUALITY

The following discussion is based on the Air Quality Analysis, prepared by Christopher A. Joseph & Associates on March 19, 2009. A copy of this analysis and modeling data results are included in Appendix C, Air Quality Data, to this Initial Study.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact may occur if the proposed 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. For projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the most recent AQMP prepared by the South Coast Air Management District (SCAQMD).

The Project site is located within the South Coast Air Basin (Basin), within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary. Moreover, to ensure continued progress toward clean air and to comply with state and federal requirements, the SCAQMD routinely prepares AQMP's for the Basin. The most recent of these was adopted by the

Governing Board of the SCAQMD on June 1, 2007 (referred to herein as the 2007 AQMP) and was prepared in coordination with the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the U.S. Environmental Protection Agency (U.S. EPA).

The 2007 AQMP incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. This new data allows the 2007 AQMP to more accurately accommodate population growth in the Basin, reduce the high levels of pollutants in the Basin from existing and future sources, meet federal and State air quality standards, reduce the population's exposure to unhealthy levels of pollutants, and minimize the fiscal impact that pollution control measures have on the local economy. The 2007 AQMP presents a comprehensive strategy aimed at controlling air pollution from all potential emitters, including stationary sources, on-road and off-road mobile sources, and area sources. It identifies the control measures that will be implemented to reduce major sources of pollutants.

For the proposed Project to be consistent with the 2007 AQMP, it should be consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of the SCAG's Regional Comprehensive Plan and Guide (RCPG). Since the Growth Management Chapter forms the basis of the land use and transportation control components of the 2007 AQMP, the SCAG projections in the RCPG are considered consistent with the AQMP growth projections. In addition, the proposed Project must accommodate the expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled (VMT) both within the project site and the community in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project is consistent with the AQMP.

As discussed below in Response 12(a), Population and Housing, of this Initial Study, SCAG data compiled in 2008 estimates the City of Los Angeles is projected to have a population of 4,057,484 persons and approximately 1,433,105 housing units by 2010. SCAG further projects that the City of Los Angeles will have a 2015 population of approximately 4,128,125 persons (a 1.7 percent increase) and an estimated 1,493,244 housing units (a 4.0 percent increase) in 2015.[6] The City also provides population and housing growth estimates for each Community Plan Area ("CPA") within the City. Because population and housing impacts are most importantly recognized at the local level, analyzing housing and population characteristics by CPA can be a more accurate method of predicting potential impacts.

The Project site is located in the Westlake CPA of the City within the Central City West Specific Plan[7] at 1416 West Beverly Boulevard. The proposed Project would involve the demolition of all existing residential and industrial uses on the Project site (one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, and an

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[6] *Southern California Association of Governments, SCAG 2004 Growth Forecasts, City of Los Angeles Subregion http://www.scag.ca.gov/forecast/downloads/2008GF.xls, March 2009.*

[7] *Ordinance No. 166,703 effective April 3, 1991. Amended by Ordinance No. 167,944 effective June 29, 1992. Amended by Ordinance No. 176,519 effective April 19, 2005.*

industrial building) and the removal of associated landscaping and parking. The existing development would be replaced by a multi-family residential building comprised of five residential stories, 153 for-rent dwelling units with associated landscaping, amenities and three levels of under-structure parking.

The population in the Westlake CPA is estimated to increase from 120,446 persons in 2008[8] to 121,987 persons by 2010,[9] while housing is estimated to increase from 38,373 residential units in 2008[10] to 38,860 residential units by 2010.[11] Currently, the Project site contains 12 multi-family residential units and one single-family home. In 2008, it was anticipated that housing units within the Westlake CPA had a population density of approximately 3.17 persons per multi-family unit and 4.64 per single-family unit.[12] Therefore, the existing residential units located on the Project site are anticipated to house approximately 43 persons. The Project is anticipated to result in a net increase of approximately 438 persons[13] and 140 new residential units[14] upon buildout. The total of 438 new residents introduced into the Westlake CPA by the proposed Project would represent less than one percent of the overall population growth expected to occur between 2008 and 2011. As for housing, the addition of 140 permanent dwelling units to the Westlake CPA by the proposed Project would represent less than one percent of the overall housing growth forecasted to occur between 2008 and 2011 in the CPA.

The net contribution of 438 new individuals and 140 new residential units by the proposed Project is not considered to be a substantial increase in population or housing for the area because this additional population and housing is within the City's projections for the Westlake CPA. Therefore, the population and housing growth associated with the proposed Project has already been anticipated and planned for in the CPA. Since SCAG's regional growth forecasts are based upon, among other things, land uses specified in City general plans, the proposed Project would also be consistent with the SCAG's regional forecast projections and would not jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin. Therefore, the proposed Project would also be consistent with the 2007 AQMP.

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[8] *City of Los Angeles Department of City Planning, City of Los Angeles Population & Housing Estimates (2007), Summary Data by Community Plan Area: Westlake Community Plan, website: http://cityplanning.lacity.org/DRU/Locl/LocRpt.cfm?geo=CP&sgo=CT#, July 14, 2008.*

[9] *City of Los Angeles Department of City Planning, Wilshire Community Plan, adopted September 16, 1997.*

[10] *City of Los Angeles Department of City Planning, City of Los Angeles Population & Housing Estimates (2007), Summary Data by Community Plan Area: Westlake Community Plan, website: http://cityplanning.lacity.org/DRU/Locl/LocRpt.cfm?geo=CP&sgo=CT#, July 14, 2008.*

[11] *City of Los Angeles Department of City of Planning Demographic Research Unit, Population and Housing Profile Westlake Community Plan Area, Community Profile, Website: http://cityplanning.lacity.org/, updated May 2009.*

[12] *City of Los Angeles Department of City Planning, City of Los Angeles Population & Housing Estimates (2006), Summary Data by Community Plan Area: Westlake Community Plan, website: http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=Wlk&sgo=ct&rpt=PnH&yrx=08, May 20, 2009.*

[13] *153 units (proposed)*3.14 persons/unit=481 persons–43 persons (12 existing multi-family units @ 3.17 persons/unit+ 1 existing single-family unit @ 4.64 persons/unit)=438 net persons*

[14] *153 units (proposed) –13 units (existing)=140 net residential units*

The area surrounding the Project site is characterized by a dense combination of educational, commercial and residential land uses. The residents of the proposed Project would be able to walk to neighborhood-serving retail uses (e.g., shopping and restaurant facilities). In addition, the Metropolitan Transportation Authority (Metro) operates five routes within walking distance of the Project site, and the City of Los Angeles Department of Transportation (LADOT) operates two local DASH service routes near the Project site. The proposed Project is planned in a way that results in the minimization of VMT both within the Project area and the community in which it is located. This type of urban infill/improvement development is consistent with the goals of the AQMP for reducing the emissions associated with new development. Therefore, the proposed Project would be consistent with the goals of the AQMP.

Based on this information, the proposed Project would not jeopardize attainment of the air quality standards set forth in the 2007 AQMP for the Basin and would not conflict with or obstruct implementation of the 2007 AQMP. Therefore, the Project's potential impact under this significance threshold is less than significant and no mitigation measures are warranted.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. The proposed 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. As mentioned previously, the proposed Project is located in the SCAQMD. Presently, three categories of air pollutants are regulated by federal, State, and/or regional government agencies: criteria pollutants, toxic air contaminants (addressed in Response 3(d) below), and greenhouse gases. These air pollutants, which are emitted in the Basin via "everyday" activities, can pose significant health and environmental risks.

Criteria Air Pollutants

The Federal Clean Air Act (FCAA) of 1970, and subsequent Federal Clean Air Act Amendments (FCAAA) of 1977 and 1990, required the establishment of national ambient air quality standards (NAAQS) for wide-spread pollutants considered harmful to public health and the environment. These pollutants, commonly referred to as criteria pollutants, include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). The FCAA also afforded individual states the option to adopt standards that are more stringent and/or include other pollutants. As such, the CARB also established ambient air quality standards for the state (CAAQS) as outlined in the 1988 California Clean Air Act (CCAA).

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 criteria pollutant thresholds outlined in Table IV-1, SCAQMD's Significant Emissions Thresholds, below be considered significant:

Table IV-1
SCAQMD's Significant Emissions Thresholds

Pollutant	Construction Threshold (pounds/day)	Operational Threshold (pounds/day)
VOC (volatile organic compounds)	75	55
NO_x (nitrogen oxides)	100	55
CO (carbon monoxide)	550	550
SO_x (sulfur oxides)	150	150
PM_{10} (respirable particulate matter)	150	150
$PM_{2.5}$ (fine particulate matter)	55	55

Source: South Coast Air Quality Management District, Air Quality Significance Thresholds, website: http://www.aqmd.gov/CEQA/hdbk.html, March 2009.

Construction Emissions

During construction, three basic types of activities would be expected to occur and generate criteria pollutant emissions. The first activity would involve the demolition of the existing on-site structures, which consist of one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, and an industrial building totaling approximately 11,279 square feet (193,800 square feet). Once demolished, the debris from the buildings would be hauled to a nearby landfill. Second, the development site would be prepared, excavated, and graded to accommodate the parking structure and building foundations. It is anticipated that approximately 24,089 cubic yards of soil would be hauled offsite. Third, the 153 new residential units with associated amenities and parking would be constructed. Overall, construction is anticipated to begin in November of 2009 and end in March of 2011.

The following construction activities at the project site would temporarily generate air pollution emissions: (1) demolition, grading, and excavation; (2) construction workers traveling to and from project site; (3) delivery and hauling of construction supplies, debris, and soil to and from the project site; (4) the fuel combustion by onsite construction equipment; (5) building construction, including the application of architectural coatings, and (6) paving of the site. Table IV-2, Duration and Equipment Used During Construction Phases, provides the estimated duration of each phase and the equipment anticipated to be used during each phase.

Table IV-2
Duration and Equipment Used During Construction Phases

Phase	Duration (month/year)	Equipment[(1)]
Demolition	11/09 - 12/09	1 Concrete/Industrial Saw 1 Rubber Tired Dozer 2 Tractors/Loaders/Backhoes 1 Water Truck
Grading/Excavation	01/10 20 - 04/10	1 Grader 1 Rubber Tired Dozer 1 Tractor/Loader/Backhoe 1 Water Truck
Building Construction	05/10 - 03/11	1 Crane 2 Forklifts 1 Tractor/Loader/Backhoe 1 Water Truck
Paving	02/11 - 03/11	4 Cement and Mortar Mixers 1 Paver 1 Paving Equipment 1 Roller 1 Tractor/Loader/Backhoe 1 Water Truck

Notes:
(1) The default equipment listed in the URBEMIS 2007 model, which is based on the size of the site and associated construction activities, was used for calculation purposes.

The analysis of daily construction emissions has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. Table IV-3, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days and compares them to the SCAQMD thresholds of significance. These calculations assume the distance from the site to the debris landfill during the demolition phase would be 30 miles round trip (URBEMIS 2007 default) and 40 miles round trip for the soil export (more conservative than the URBMIS 2007 default value). These calculations assume that appropriate dust control measures would be implemented during each phase of development as required by SCAQMD Rule 403-Fugitive Dust, which governs fugitive dust emissions from construction projects. This rule sets forth a list of control measures that must be undertaken for all construction projects to insure that no dust emissions from the project are visible beyond the property boundaries. These include:

- Water exposed surfaces and unpaved roads (manage haul road) twice a day as required under SCAQMD Rule 403—Fugitive Dust
- Reduce speed on unpaved roads to less than 15 mph
- Provide water to stabilize material while loading/unloading to reduce fugitive dust emissions

Table IV-3
Estimated Peak Daily Construction Emissions[(1)]

Emissions Source	Emissions in Pounds per Day					
	ROG	**NOx**	**CO**	**SOx**	**PM_{10}**	**$PM_{2.5}$**
Demolition Phase (2009)						
Fugitive Dust	0.00	0.00	0.00	0.00	2.18	0.45
Off-Road Diesel	1.80	13.76	6.25	0.00	0.84	0.77
On-Road Diesel	0.19	2.38	0.95	0.00	0.11	0.10
Worker Trips	0.05	0.08	1.52	0.00	0.01	0.01
Total Emissions	**2.03**	**16.22**	**8.71**	**0.00**	**3.15**	**1.33**
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***
Site Grading/Excavation Phase (2010)						
Fugitive Dust	0.00	0.00	0.00	0.00	4.11	0.86
Off-Road Diesel Equipment	3.00	24.99	12.46	0.00	1.25	1.15
On-Road Diesel Equipment	1.34	16.79	6.70	0.02	0.79	0.68
Worker Trips	0.03	0.06	1.13	0.00	0.01	0.00
Total Emissions	**4.38**	**41.84**	**20.29**	**0.02**	**6.16**	**2.70**
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 (2010)						
Building Construction Off-Road Diesel Equipment	1.74	14.39	6.21	0.00	0.76	0.70
Building Construction Vendor Trips	0.35	3.85	3.19	0.01	0.19	0.16
Building Construction Worker Trips	0.38	0.67	12.76	0.01	0.10	0.06
Total Emissions	**2.47**	**18.92**	**22.16**	**0.02**	**01.06**	**0.92**
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 (2011)						
Building Construction Off-Road Diesel Equipment	1.61	13.30	6.01	0.00	0.71	0.65
Building Construction Vendor Trips	0.32	3.47	2.96	0.01	0.17	0.15
Building Construction Worker Trips	0.35	0.62	11.88	0.01	0.10	0.06
Architectural Coatings	57.67	0.00	0.00	0.00	0.00	0.00
Architectural Coatings Worker Trips	0.08	0.14	2.78	0.00	0.02	0.01
Total Emissions	**60.04**	**17.53**	**23.63**	**0.02**	**1.01**	**0.86**
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***
Paving (2011)						
Paving Off-Gas	0.16	0.00	0.00	0.00	0.00	0.00
Paving Off-Road Diesel Equipment	2.98	19.95	10.41	0.00	1.49	1.37
Paving On-Road Diesel Equipment	0.05	0.58	0.23	0.00	0.03	0.02
Paving Worker Trips	0.07	0.12	2.36	0.00	0.02	0.01
Total Emissions	**3.25**	**20.65**	**13.00**	**0.00**	**1.54**	**1.41**

Table IV-3
Estimated Peak Daily Construction Emissions[(1)]

Emissions Source	Emissions in Pounds per Day					
	ROG	**NOx**	**CO**	**SOx**	**PM_{10}**	**$PM_{2.5}$**
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
(1) Dust control measures as required by SCAQMD Rule 403—Fugitive Dust.

Source: Christopher A. Joseph & Associates, March 2009. Calculation sheets are provided in Appendix C, Air Quality Data, to this Initial Study.

As shown in Table IV-3, construction-related daily emissions associated with the proposed project would not exceed any SCAQMD significance thresholds for criteria pollutants during the construction phase. Therefore, construction impacts are considered to be less than significant and no mitigation measures are warranted.

For an analysis of the proposed Project's localized air quality impacts during project construction, refer to Response 3(d) below.

Regional Operational Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project site after occupation. Stationary area source emissions would be generated by the consumption of natural gas, the operation of landscape maintenance equipment, the use of consumer products, and architectural coating. Mobile emissions would be generated by the motor vehicles traveling to and from the Project site.

The analysis of daily operational emissions associated with the proposed Project and the existing use of the Project site has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. The URBEMIS air quality model is a land-use-based model that estimates air emissions based on the type and density of the proposed land uses, and is influenced by such factors as trip generation rates, proximity to mass transit, local demographics, and the extent of pedestrian friendly amenities. Factors such as the Project's location within the Westlake Community Plan area in the City of Los Angeles, and the Project site's proximity to different modes of public transit service, serve to influence the air emissions that would be generated by the proposed Project. These factors serve to minimize the VMT within both the Project and the community in which it is located, and consequently minimize the generation of air pollutant emissions.

The results of these calculations are presented in Table IV-4, Estimated Future (2011) Daily Operational Emissions. As shown below, the net emissions generated by the proposed Project's operations would not exceed the thresholds of significance set by the SCAQMD during both summer and winter seasons. Therefore, impacts associated with operational emissions from the proposed project would be less than significant with respect to regional operational emissions and no mitigation measures are required.

Table IV-4
Estimated Future (2011) 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						
Existing Operational Emissions						
Natural Gas	0.01	0.13	0.06	0.00	0.00	0.00
Landscape Maintenance Equipment	0.13	0.02	1.59	0.00	0.01	0.01
Consumer Products	0.67	0.00	0.00	0.00	0.00	0.00
Architectural Coatings	0.02	0.00	0.00	0.00	0.00	0.00
Mobile (Vehicle) Sources	0.63	0.59	7.50	0.01	1.37	0.26
Total Emissions	1.46	0.74	9.15	0.01	1.38	0.27
Future Operational Emissions						
Natural Gas	0.10	1.23	0.52	0.00	0.00	0.00
Landscape Maintenance Equipment	0.12	0.02	1.55	0.00	0.01	0.01
Consumer Products	8.05	0.00	0.00	0.00	0.00	0.00
Architectural Coatings	0.27	0.00	0.00	0.00	0.00	0.00
Mobile (Vehicle) Sources	7.85	6.46	92.17	0.09	15.74	2.99
Total Emissions	16.39	7.71	94.24	0.09	15.75	3.00
Total Net Emissions	**14.93**	**6.97**	**85.09**	**0.08**	**14.37**	**2.73**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***
Wintertime (Non-Smog Season) Emissions						
Existing Operational Emissions						
Natural Gas	0.01	0.13	0.06	0.00	0.00	0.00
Consumer Products	0.67	0.00	0.00	0.00	0.00	0.00
Architectural Coatings	0.02	0.00	0.00	0.00	0.00	0.00
Mobile (Vehicle) Sources	0.66	0.73	7.13	0.01	1.37	0.26
Total Emissions	1.36	0.86	7.19	0.01	1.37	0.26
Future Operational Emissions						
Natural Gas	0.10	1.23	0.52	0.00	0.00	0.00
Consumer Products	8.05	0.00	0.00	0.00	0.00	0.00
Architectural Coatings	0.27	0.00	0.00	0.00	0.00	0.00
Mobile (Vehicle) Sources	7.57	8.31	81.40	0.07	15.74	2.99
Total Emissions	15.99	9.54	81.92	0.07	15.74	2.99
Total Net Emissions	**14.63**	**8.68**	**74.73**	**0.06**	**14.37**	**2.73**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Christopher A. Joseph & Associates, January 2009. Calculation sheets are provided in Appendix C, Air Quality Data, to this Initial Study.

For an analysis of the proposed Project's localized air quality impacts during project operation, refer to Response 3(d) below.

Greenhouse Gas Emissions

Greenhouse gas emissions were evaluated in this analysis due to increasing concerns over global climate change. Since the Federal Government currently does not regulate emissions of greenhouse gases, CARB has been tasked with regulating greenhouse gas emissions in California under the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB-32). AB-32 was passed in response to Executive Order S-3-05 issued by Governor Schwarzenegger in 2005, which sets forth a series of target dates by which statewide emission of greenhouse gases would be progressively reduced:

- By 2010, reduce greenhouse gas emissions to 2000 levels;
- By 2020, reduce greenhouse gas emissions to 1990 levels; and
- By 2050, reduce greenhouse gas emissions to 80 percent below 1990 levels.

AB-32 requires the CARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide greenhouse gas emissions are reduced to 1990 levels by 2020 (representing an approximate 25 percent reduction in emissions). In addition to identifying early actions to reduce greenhouse gases, CARB has also developed mandatory greenhouse gas reporting regulations that require emissions reporting for classes of facilities that collectively account for 94 percent of the stationary source emissions in California, including cement plants, oil refineries, electric generating facilities/providers, co-generation facilities, hydrogen plants, and other stationary combustion sources that emit more than 25,000 metric tons per year of carbon dioxide equivalencies (CO_2e) emissions.[15]

At this time there are currently no thresholds or official guidance adopted by the SCAQMD or other agencies in California to assess the significance of potential greenhouse gas emissions. However, the State Office of Planning and Research (OPR) is required to develop CEQA guidelines for the effects and mitigation of greenhouse gas emissions. These guidelines and regulations are expected to be certified and adopted by the State Resources Agency before January 1, 2010. In the interim, OPR, in collaboration with the California Resources Agency, the California Environmental Protection Agency, and the CARB, recently provided a new technical advisory containing informal guidance for public agencies as they address the issue of climate change in their CEQA documents. This technical advisory entitled, *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*, provides OPR's perspective on the issue and precedes the development of implementing regulations for CEQA in accordance with Senate Bill 97 (Chapter 185, Statutes of 2007).

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[15] *California Air Resources Board, December 6, 2007c, Proposed Regulation for the Mandatory Reporting of California Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), available at http://www.arb.ca.gov/cc/ccei/reporting/GHGReportBoardSlides12_06_07.pdf (proposed regulations were approved by CARB on December 6, 2007).*

In the technical advisory, OPR recommends each public agency that is a lead agency for complying with CEQA to develop its own approach to performing a climate change analysis for projects that generate greenhouse gas emissions. A consistent approach should be applied for the analysis of such projects, and the analysis must be based on best available information. For such projects, three types of analyses are used to determine whether the project could be in conflict with the State, regional, and local measures for reducing greenhouse gas emissions. The analyses are as follows:

I. Quantify the potential greenhouse gas emissions associated with the implementation of the project.

II. Assess the significance of the impact on climate change using applicable guidance documents and State, regional, and local greenhouse gas reduction goals.

III. Assess whether elements of the project and associated mitigation measures contribute to the efficiency of the project and sufficiently reduce greenhouse gas emissions.

I. Greenhouse Gas Quantification

In order to make a meaningful and significant attempt to analyze the Project's effects on greenhouse gas emissions and climate change, the potential direct and indirect greenhouse gas emissions due to the implementation of the Project were estimated. Consistent with the OPR technical advisory and the California Air Pollution Control Officers Association (CAPCOA) white paper (discussed below in greenhouse gas analysis II), an inventory of the proposed Project's greenhouse gas emissions in carbon dioxide equivalencies (CO_2e) was calculated using URBEMIS 2007 (area and motor vehicle emissions) and the methodologies described in the California Climate Action Registry (CCAR) General Reporting Protocol (version 3.1) published in January 2009.[16] Emission factors contained in the CCAR Protocol were used to calculate the estimated greenhouse gas emissions from electricity usage. The predicted greenhouse gas emissions for the proposed Project are conservative estimates since they do not include all project design features that would increase energy efficiency and decrease water usage (discussed below in greenhouse gas analysis III), which would significantly reduce potential greenhouse gas emissions.

II. Significance Assessment

As stated previously, there are currently no thresholds or official guidance adopted by the SCAQMD or other agencies in California to assess the significance of potential greenhouse gas emissions. However, a feasible way to determine if the proposed Project would have a significant impact on greenhouse gas emissions is to evaluate if the implementation of the Project would conflict with any recommended State, regional, and/or local greenhouse gas reduction goals or policies that are applicable to the Project.

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[16] *General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions. California Climate Action Registry, January 2009.*

AB-32

As an initial step of AB-32, CARB was required to adopt regulations that require the reporting and verification of statewide greenhouse gas emissions by January 1, 2008. These newly adopted regulations require emissions reporting beginning January 1, 2009 for classes of facilities that collectively account for 94 percent of the stationary source emissions in California, including cement plants, oil refineries, electric generating facilities/providers, co-generation facilities, hydrogen plants, and other stationary combustion sources that emit more than 25,000 metric tons per year of CO_2e emissions.[17] Since the Project would not fall under any of these industrial categories that are required to report their greenhouse gas emissions and would not have any significant stationary sources, the Project is not subject to CARB's mandatory reporting.

Through updated efforts, CARB staff is now recommending the expansion of the early actions for reducing greenhouse gas emissions under AB-32. All of these measures need to be in place and operative by January 1, 2012. The most recent list of the CARB's 44 early action strategies are in the sectors of fuels, transportation, forestry, agriculture, education, energy efficiency, commercial, solid waste, cement, oil and gas, electricity, and fire suppression. Since the proposed Project is a residential development, the potential impacts from the implementation of the Project would not conflict with or obstruct the implementation of CARB's 44 early action strategies. As such, the Project's potential impact on greenhouse gas emissions and climate change would be deemed less than significant under AB-32.

OPR

The OPR technical advisory discussed above identifies examples of mitigation measures that have been employed by some public agencies to reduce greenhouse gas emissions, either as general development policies or on a project-by-project basis. All of the applicable mitigation measures contained in the OPR technical advisory are consistent with the conservation and sustainable principles for the Project as shown in Table IV-5, Project Consistency with OPR Recommended Greenhouse Gas Mitigation Measures, below:

[17] *California Air Resources Board, December 6, 2007c, Proposed Regulation for the Mandatory Reporting of California Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), available at http://www.arb.ca.gov/cc/ccei/reporting/greenhouse gasReportBoardSlides12_06_07.pdf (proposed regulations were approved by CARB on December 6, 2007).*

Table IV-5
Project Consistency with OPR Recommended Greenhouse Gas Mitigation Measures

OPR Recommended Mitigation Measure	Project Consistency
Land Use and Transportation	
Encourage infill, redevelopment, and higher density development.	**Consistent.** The proposed Project would significantly increase the density development of the site compared to the current land use (13 occupied dwelling units to 153 dwelling units). Moreover, the Los Angeles Municipal Code (LAMC) permits 170 dwellings for the size of the Project site with a density bonus, and the proposed Project would provide 153 dwelling units.
Implement land use strategies to encourage jobs/housing proximity, promote transit-oriented development, and encourage high density development along transit corridors.	**Consistent.** The area surrounding the Project site is characterized by a dense combination of educational, commercial and residential land uses. As such, the residents of the proposed Project would be able to walk to neighborhood-serving retail uses (e.g., shopping and restaurant facilities). Regional access to the Project site is provided by the Hollywood Freeway (US-101), located less than one mile north of the Project site, and the Harbor Freeway (I-110), located less than one mile west of the Project site.
Incorporate features into project design that would accommodate the supply of frequent, reliable, and convenient public transit.	**Consistent.** The Metropolitan Transportation Authority (Metro) operates five routes within walking distance of the Project site and the City of Los Angeles Department of Transportation (LADOT) also operates two local DASH service routes near the Project site.
Encourage walking, bicycling, and the use of public transit systems.	**Consistent.** The area surrounding the Project site is characterized by a dense combination of educational, commercial and residential land uses. As such, the residents of the proposed Project would be able to walk to neighborhood-serving retail uses (e.g., shopping and restaurant facilities). In addition, the Metropolitan Transportation Authority (Metro) operates five routes within walking distance of the Project site and the City of Los Angeles Department of Transportation (LADOT) also operates two local DASH service routes near the Project site.
Encourage new developments to integrate housing, civic, and retail amenities to help reduce VMT resulting from discretionary automobile trips.	**Consistent.** The area surrounding the Project site is characterized by a dense combination of educational, commercial and residential land uses. As such, the residents of the proposed Project would be able to walk to neighborhood-serving retail uses (e.g., shopping and restaurant facilities). The Project would also provide a gym and a pool area for the residents.
Limit idling time for commercial vehicles, including delivery and construction vehicles.	**Consistent.** There is no commercial component associated with the Project. The idling time for construction vehicles would be limited to 15 minutes.

Table IV-5
Project Consistency with OPR Recommended Greenhouse Gas Mitigation Measures

OPR Recommended Mitigation Measure	Project Consistency
Green Buildings	
Encourage public and private construction of LEED certified or equivalent buildings.	**Consistent.** The new 153 dwelling units would be designed with numerous LEED components, such as improvement upon Title 24 energy efficiency standards by 14 percent, installation of dual-glazed energy efficient windows and doors, incorporation of various water conservation measures, etc. (outlined in greater detail below in greenhouse gas analysis III).
Energy Conservation Policies and Actions	
Recognize and promote energy saving measures beyond Title 24 requirements for residential and commercial projects.	**Consistent.** All structures for the proposed Project would improve upon Title 24 energy efficiency standards by 14 percent.
Where feasible, include in new buildings facilities to support the use of low/zero carbon fueled vehicles, such as the charging of electric vehicles from green electricity sources.	**Consistent.** The proposed Project would be designed to accommodate electric vehicle charging stations should they be deemed feasible and cost effective in the future.
Incorporate on-site renewable energy production, including installation of photovoltaic cells or other solar options.	**Consistent.** The proposed Project would install and use solar or low-emission water heaters.
Create bicycle lanes and walking paths directed to the location of schools, parks, and other destination points.	**Consistent.** The area surrounding the Project site is characterized by a dense combination of educational, commercial and residential land uses. The proposed Project would provide sufficient sidewalk and roadway access to these types of destination points.

As shown in Table IV-5 above, the proposed Project would be consistent with mitigation measures and methodologies contained in the OPR advisory document. As such, the Project's potential impact on greenhouse gas emissions and climate change would be deemed less than significant under the OPR technical advisory document.

CAPCOA White Paper

In January of 2008, the California Air Pollution Control Officers Association (CAPCOA) prepared a white paper concerning the evaluation of greenhouse gas emissions under CEQA in the hopes to provide a common platform of information and tools to support local governments. As stated in the CAPCOA white paper, "This paper is provided as a resource for local policy and decision makers to enable them to make the best decisions they can in the face of incomplete information during a period of change. This paper is intended as a resource, not a guidance document. It is not intended, and should not be interpreted, to dictate the manner in which an air district or lead agency chooses to address greenhouse gas emissions in the context of its review of projects under CEQA."

As discussed above, URBEMIS 2007 was used to estimate the potential criteria pollutant and greenhouse gas emissions from area and mobile sources associated with the proposed Project. CAPCOA considers the use of URBEMIS 2007 to be consistent with the methodology recommended in the white paper. To

estimate the potential greenhouse gas emissions from electricity usage at the proposed Project site, the CCAR Version 3.1 was used. This is also consistent with the recommended methodology contained in the CAPCOA white paper.

The CAPCOA white paper also provides design criteria and recommended mitigation measures to reduce greenhouse gas emissions from land development projects. Implementation of development techniques, specifically design criteria conducive to enhancing alternate modes of transportation, including transit, walking, and bicycling, is considered to be a comprehensive approach to reduce VMT and associated emissions. As discussed previously, the area surrounding the Project site is characterized by a dense combination of educational, commercial and residential land uses. As such, the residents of the proposed Project would be able to walk to neighborhood-serving retail uses (e.g., shopping and restaurant facilities). In addition, the Metro operates five routes within walking distance of the Project site and the LADOT operates two local DASH service routes near the Project site.

Based on all the information presented above, the proposed Project would be consistent with the CAPCOA white paper greenhouse gas quantification methodologies and recommended mitigation measures. As such, the Project's potential impact on greenhouse gas emissions and climate change would be deemed less than significant under the CAPCOA white paper.

City of Los Angeles

The City of Los Angeles has begun to address the issue of global climate change by publishing Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (the LA Green Plan).[18] This document outlines the goals and actions the City has established to reduce the generation and emissions of greenhouse gases from both public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels. To achieve this, the City will:

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

As part of the LA Green Plan, the Los Angeles Green Building Ordinance was passed in April 2008 that promotes green building practices by creating a series of requirements and incentives for developers to meet the U.S. Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Green Building Rating System. While the buildings associated with the proposed Project are not aiming for LEED certification, they would incorporate numerous LEED aspects. The energy efficiency and water conservation measures to be implemented as part of the Project, which compliment the goals of the LA Green Plan, are outlined below in greenhouse gas analysis III. As such, the Project's potential

[18] *Green LA: An Action Plan to Lead the Nation In Fighting Global Warming. City of Los Angeles, May 2007.*

impact on greenhouse gas emissions and climate change would be deemed less than significant under the LA Green Plan.

III. Efficiency Assessment of the Project

The Project is proposed to improve upon Title 24 energy efficiency standards by 14 percent. To achieve environmental sustainability and associated decreases in greenhouse gas emissions, the following energy-efficient design features would be incorporated into the Project to minimize energy use.

- Dual-glazed energy efficient windows and doors with a U-factor and solar heat gain coefficient which exceeds California Title 24 requirements.
- South facing balconies which reduce solar heat gain.
- Energy-efficient parking structure lights throughout the Project site.
- Energy efficient lighting comprised of compact fluorescent lamps installed in the Project.
- Light-colored roof materials used for Project buildings to reflect heat.
- Exterior walls with R-19 minimum insulation, which exceeds the R-13 Title 24 requirements.

Pursuant to the Los Angeles Department of Water and Power new development requirements of March 2008, the Project would incorporate the following series of water conservation devices and measures as applicable to increase water conservation.

- Install high efficiency toilets (1.28 gallons per flush or less, includes dual flush).
- Install high efficiency urinals (0.5 gallons per flush or less, includes waterless).
- Install faucet hardware in restrooms with a faucet flow rate of 1.5 gallons per minute or less.
- Install showerheads with a flow rate of 2.0 gallons per minute or less.
- Limit showers to one showerhead per shower stall.
- Install high efficiency clothes washers (water factor of 6.0 or less) where clothes washers are provided.
- Install high efficiency dishwashers (Energy Star rated) where dishwashers are provided.
- Install domestic water heating systems located in close proximity to point(s) of use, as feasible; use of tank-less and on-demand water heaters as feasible.
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration.
- Single-pass cooling shall be strictly prohibited.
- Install irrigation systems that meet the following requirements:
    - Weather-based irrigation controller with rain shutoff.

- Flow sensor and master valve shutoff (large landscapes).
- 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 plant materials.
- Use of landscaping contouring to minimize precipitation runoff.

- The Project is mandated to use recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary).

The implementation of these green building principles, performance standards, and mitigation measures will extensively reduce the potential greenhouse gas emissions associated with the implementation of the Project. As such, the Project's potential impact on greenhouse gas emissions and climate change would be deemed less than significant under this analysis and no mitigation measures are warranted.

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

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

Because the Basin is currently in non-attainment for ozone, CO, and PM_{10} (does not meet the national and/or State ambient air quality standards created under the Federal Clean Air Act (FCAA) and the California Clean Air Act (CCAA)), related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the proposed Project's 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 the proposed Project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts (outlined in Response 3(b) above). Furthermore, the SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions of non-attainment pollutants. Therefore, this analysis assumes that individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed in Response 3(b) above, the proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended thresholds. Therefore, the proposed Project would not generate a cumulatively considerable increase in emissions of non-attainment pollutants, and the impacts would be less than significant and no mitigation measures are warranted.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if the proposed Project would expose sensitive receptors to substantial pollutant concentrations. Sensitive receptors are populations that are more susceptible to the effects of air pollution than others, such as the elderly and children under the age of fourteen. The SCAQMD identifies the following locations that may contain high concentrations of sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[19]

On-site air emissions during construction and operation of the proposed Project have the potential to affect nearby sensitive receptors. Furthermore, traffic congested roadways and intersections have the potential to generate elevated concentrations of CO that might also affect nearby sensitive receptors. In an effort to prevent sensitive receptors from being exposed to harmful levels of air pollutants, the SCAQMD has:

- Developed localized significance thresholds (LSTs) for NO_x, CO, PM_{10}, and $PM_{2.5}$. The LSTs represent the maximum pounds of emissions per day that can be generated during the construction or operation of a project without causing or contributing to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[20] apply to projects that are less than or equal to five acres in size.
- Set the significance threshold for CO concentrations at intersections affected by project operations equal to the national and State 1-hour and 8-hr CO ambient air quality standards. The national 1-hour CO standard is 35.0 parts per million (ppm) and the State 1-hour CO standard is 20.0 ppm. Since the State 1-hour CO standard is less, 20.0 ppm is used as the 1-hour CO concentration threshold of significance. The national 8-hour and State 8-hour ambient air quality standards are both 9.0 ppm.
- Established thresholds of significance for potential exposure to toxic air contaminants (TACs). TACs refer to a diverse group of air pollutants that are capable of causing chronic (e.g., of long duration) and acute (e.g., severe but of short duration) adverse effects on human health. TACs are suspected, or known, to cause cancer, birth defects, neurological damage, or death. TACs may be

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[19] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, pages 5-1.*

[20] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

emitted from a variety of common sources, such as industry, agriculture, fuel combustion (motor vehicles), and commercial operations (e.g., dry cleaners). A project that emits (or exposes sensitive receptors to) TACs and exceeds the following criteria is considered to have a significant air quality impact; (1) the probability of contracting cancer for the Maximally Exposed Individual (MEI) [21] exceeds 10 in one million; or (2) ground-level concentrations of non-carcinogenic TACs would result in a hazard index[22] greater than 1.0 for the MEI.

Localized Emissions of NOx, CO, PM_{10} and $PM_{2.5}$

The SCAQMD has developed LST look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized on-site construction and operational emissions at small sites. LSTs are provided for each of the SCAQMD's 38 source receptor areas (SRA) at various distances from the source of emissions. The Project site is located in the Westlake community of the City, which is located within SRA 1, which covers the central Los Angeles area. The nearest and most notable off-site sensitive receptors that could potentially be affected by localized air quality emissions associated with the construction and operation of the proposed Project include single- and multi-family residential buildings located adjacent and to the south of the Project site (including a five-story apartment building located along South Witmer Street), an existing two-story residential building located adjacent and to the west of the Project site, Belmont High School located to the west of the Project site across South Witmer Street, and a multi-family residential complex located adjacent and east of the Project site across South Lucas Avenue. Given the proximity of these sensitive receptors to the Project site, the LSTs for construction and operation of the proposed Project 1.26-acre (gross acreage) site with receptors located within 25 meters (82.02 feet) have been calculated using linear regression.

Localized Construction Emissions

The average daily construction emissions that would be generated on the Project site during the construction phases are shown in Table IV-6, Estimated Localized Air Quality Impacts – Construction, along with the applicable construction LSTs for SRA 1. As shown, emissions generated onsite during construction of the proposed Project would not exceed the SCAQMD's LSTs for construction period emissions. Therefore, localized construction impacts would be less than significant, as construction of the proposed Project would not expose nearby sensitive receptors to substantial pollutant concentrations and no mitigation measures are warranted.

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[21] *An MEI is a hypothetical off-site person, usually at or near the site boundary, who would receive the maximum exposure from a facility's operations.*

[22] *A hazard index measures the potential for non-cancer health effects. It is the ratio of the estimated exposure level to the Reference Exposure Level, which is the level at or below which no adverse health effects are anticipated.*

Table IV-6
Estimated Localized Air Quality Impacts – Construction

Emissions Source	Emissions in Pounds per Day			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition Phase (2009)				
Total Site-Specific Emissions	13.79	6.54	3.03	1.23
SCAQMD LSTs for SRA 1	69.3	715.1	5.78	3.52
Significant Impact?	***No***	***No***	***No***	***No***
Grading Phase (2010)				
Total Site-Specific Emissions	25.04	12.69	5.36	2.01
SCAQMD LSTs for SRA 1	69.3	715.1	5.78	3.52
Significant Impact?	***No***	***No***	***No***	***No***
Building Construction (2010)				
Total Site-Specific Emissions	14.39	6.21	0.76	0.70
SCAQMD LSTs for SRA 1	69.3	715.1	5.78	3.52
Significant Impact?	***No***	***No***	***No***	***No***
Building Construction (2011)				
Total Site-Specific Emissions	13.30	6.54	0.71	0.65
SCAQMD LSTs for SRA 1	69.3	715.1	5.78	3.52
Significant Impact?	***No***	***No***	***No***	***No***
Paving Phase (2011)				
Total Site-Specific Emissions	19.97	10.86	1.49	1.37
SCAQMD LSTs for SRA 1	69.3	715.1	5.78	3.52
Significant Impact?	***No***	***No***	***No***	***No***

Source: Christopher A. Joseph & Associates, 2009. Calculation sheets are provided in Appendix C, Air Quality Data, to this Initial Study.

Localized Operational Emissions

The average daily emissions associated with stationary, area sources, and motor vehicles operating within the Project site have the potential to generate localized emissions of NOx, CO, PM_{10}, and $PM_{2.5}$. The average daily emissions have been calculated assuming that each vehicle would travel a maximum of 0.1 miles within the Project site. The results of these calculations for area sources and the internal vehicle trips are shown below in Table IV-7, Estimated Localized Air Quality Impacts – Operation. As can be seen, the average daily emissions generated within the Project site would not exceed the applicable operational LSTs for SRA 1. Therefore, the localized operational impacts would be less than significant and no mitigation measures are warranted.

Table IV-7
Estimated Localized Air Quality Impacts – Operation

Emissions Source	Emissions in Pounds per Day			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Summertime Emissions				
Total Site-Specific Emissions	2.17	15.17	0.19	0.06
SCAQMD LSTs for SRA 1	69.3	715.1	2.0	1.26
Significant Impact?	***No***	***No***	***No***	***No***
Wintertime Emissions				
Total Site-Specific Emissions	2.31	15.98	0.18	0.05
SCAQMD LSTs for SRA 1	69.3	715.1	2.0	1.26
Significant Impact?	***No***	***No***	***No***	***No***

Source: Christopher A. Joseph & Associates, 2009. Calculation sheets are provided in Appendix C, Air Quality Data, of this Initial Study.

CO Concentrations at Intersections with Project Operations (Motor Vehicles)

In order to estimate CO concentrations near congested roadways and intersections, the SCAQMD recommends using the CALINE4 dispersion model. CALINE4 adds roadway-specific CO emissions calculated from peak-hour turning volumes at each individual intersection to ambient CO air concentrations. For this analysis, localized CO concentrations were calculated based on a simplified CALINE4 screening procedure developed by the Bay Area Air Quality Management District (BAAQMD) and accepted by the SCAQMD. The simplified procedure is intended as a screening analysis by assuming worst-case conditions and providing a screening of maximum, worst-case CO concentrations. For increased accuracy, the emission factors used in the analysis have been updated to EMFAC (Emission Factors) 2007.

The maximum future 1-hour and 8-hour CO concentrations at the six intersections most affected by the operations associated with the Project are presented in Table IV-8, Predicted Future CO Concentrations with Project. The CO concentrations were calculated for receptor locations at the roadway edge, 25 feet from the roadway, 50 feet from the roadway, and 100 feet from the roadway. As stated previously, the national 1-hour CO ambient air quality standard is 35.0 ppm, the State 1-hour CO ambient air quality standard is 20.0 ppm, and the national 8-hour and State 8-hour CO ambient air quality standards are 9.0 ppm. As shown in Table IV-8, future CO concentrations near these intersections would not exceed the national and State ambient air quality standards for CO. Therefore, implementation of the proposed project and cumulative development would not expose sensitive receptors located in close proximately to these intersections to substantial localized pollutant concentrations, classifying the potential operational impacts as less than significant and no mitigation measures are warranted.

Table IV-8
Predicted Future CO Concentrations with Project

Intersection	CO Concentrations in Parts per Million (1)							
	Roadway Edge		25 feet		50 feet		100 feet	
	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour
Glendale Blvd/W 1st St/W 2nd St/Lucas Ave	7.9	6.6	7.0	5.9	6.6	5.7	6.2	5.4
Lucas Ave & 3rd St	8.4	6.9	7.2	6.0	6.7	5.7	6.3	5.4
Witmer St & 3rd St	7.5	6.3	6.5	5.6	6.2	5.4	5.9	5.1
Loma Dr & Beverly Blvd	6.7	5.7	6.2	5.3	5.9	5.2	5.7	5.0
Beaudry Ave & 2nd St Off-Ramp	7.3	6.2	6.4	5.5	6.1	5.3	5.8	5.1
Beaudry Ave & 2nd St	7.7	6.4	6.7	5.7	6.4	5.5	6.0	5.2

Notes:
(1) The national 1-hour CO ambient air quality standard is 35.0 ppm, and the State 1-hour CO ambient air quality standard is 20.0 ppm. National and State 8-hour standards are 9.0 parts per million.

Source: Traffic Information Source: The Mobility Group., Beverly & Lucas Project, Traffic Study, March 2009. Christopher A Joseph and Associates, January 2009. Calculation data and results are provided in Appendix A.

Toxic Air Contaminants (TAC)

Since the proposed Project consists of residential uses and would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, it is not anticipated that significant toxic airborne emissions would result from the construction and operation of the Project. In addition, construction activities associated with the proposed Project would be similar to the construction of other residential developments in the City and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level. Therefore, impacts associated with the release of toxic air contaminants associated with the construction and operation of the project would be less than significant and no mitigation measures are warranted.

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

Less Than Significant Impact. A significant impact may occur if construction and/or operation of the proposed Project would result in objectionable odors that would adversely impact sensitive receptors. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source, the wind speeds and direction, and the sensitivity of the receiving location each contribute to the intensity of the impact. While offensive odors rarely cause any physical harm, they can be unpleasant and cause distress among the public and generate citizen complaints.

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The proposed Project would include residential development and would not contain any of the above-listed odor producing uses. Any odors produced would be minimal, if noticeable at all; would be similar to existing residential and commercial uses in the local vicinity; and would be confined to the immediate vicinity of the new buildings.

During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors would be a temporary source of nuisance to adjacent uses, but because they are temporary and intermittent in nature, would not be considered a significant environmental impact. Therefore, Project-related impacts associated with objectionable odors would be less than significant and no mitigation measures are warranted.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed Project in conjunction with the related projects in the vicinity of the Project site would result in an increase in construction and operational emissions in the already urbanized Westlake Community Plan Area of the City. However, cumulative air quality impacts from construction, based on SCAQMD guidelines, are not analyzed in a manner similar to project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed in Response 3(b) above, with implementation of regulatory requirements, the proposed Project would not generate emissions that exceed the SCAQMD's recommended thresholds. Therefore, the proposed Project would not generate a cumulatively considerable increase in emissions for the pollutants for which the Basin is in non-attainment and impacts would be less than significant. In addition, the Project's potential impact on greenhouse gas emissions and climate change is less than significant based on the proposed Project's consistency with state, regional and local greenhouse gas (GHG) reduction strategies.

With respect to conformance with the 2007 AQMP, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2007 AQMP would not be obstructed by such growth and cumulative impacts would be less than significant. As discussed in Response 3(a) above, the proposed Project is consistent with SCAG and the Westlake Community Plan's growth projections, and would minimize the VMT within the community in which the proposed Project is located. Thus, the proposed Project would not have a cumulatively considerable contribution to this impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2007 AQMP would be less than significant.

4. BIOLOGICAL RESOURCES

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

No Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited. The Project site and the surrounding area are bounded by urban development. Vegetation currently on-site mostly consists of typical landscaping plants and trees. Additionally, there are no natural open spaces or areas of significant biological resource value on the Project site or in the vicinity of the Project site that may be suitable for sensitive plant or animal species recorded in the region, which are typically found in dune, salt marsh, riparian, sage scrub, and/or aquatic habitats. Furthermore, no candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS) are expected to occur on the Project site, as the site and the immediate surrounding area contain no habitat for such species. Therefore, the proposed Project would not have any adverse impacts to candidate sensitive, or special status species and no mitigation measures are required. No further analysis of this issue is warranted.

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. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation. The Project site is located in an urbanized area of the City, which has been previously developed. No riparian or other sensitive habitat areas are located on or adjacent to the Project site. Therefore, implementation of the proposed Project would have no impact on riparian habitat or other sensitive natural communities and no mitigation measures are required. No further analysis of this issue is warranted.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A significant impact would occur if federally protected wetlands as defined by Section 404 of the Clean Water Act are modified or removed without adequate mitigation. The Project site and surrounding area do not support riparian or wetland habitat. A review of the National Wetlands Inventory

identified no protected wetlands on or within vicinity of the Project site.[23] Therefore, the Project site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. No Project impacts to riparian or federally protected wetland habitats would occur. No mitigation measures are required and no further analysis of this issue is warranted.

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. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project site and the surrounding area are completely developed and urbanized; therefore, the site does not act as a migratory corridor or provide an area for resident terrestrial wildlife movement as it is surrounded by urban development that extends for miles. Additionally, the Project site does not contain any significant areas of natural open space or areas of significant biological resource value. No wildlife corridors are located on the Project site or in the surrounding areas due to existing development and no aquatic habitat is present on or adjacent to the site to support fish species. The highly developed conditions of the Project site and surrounding area would preclude its use as a native wildlife nursery site. As such, no impact would occur. Therefore, no mitigation measures are required and no further analysis of this issue is warranted.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance (Ordinance 177,404). The Protected Tree Ordinance provides guidelines for the preservation of all Oak trees (*Quercus* spp.) indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica var. californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).[24]

A Tree Survey was conducted for the Project site by Christopher A. Joseph & Associates on August 19, 2008. A copy of the Tree Survey is included in Appendix D, Tree Survey, to this Initial Study. The Project site is interspersed with vegetation and the steep hill on West Beverly Boulevard is densely covered with foliage. The survey found the vegetation on the Project site to consist of annual grasses, small shrubs, and mature trees. Nine trees that meet the City's trunk diameter criterion were identified.

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[23] *U.S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/nwi, July 14, 2008.*

[24] *City of Los Angeles, Office of the City Clerk, Ordinance No. 177404, website: http://clkrep.lacity.org/councilfiles/03-1459_ord_177404.pdf, March 21, 2008.*

However, the trees on the Project site are all ornamental-exotic, non-native species and have either been planted as part of the landscape development or have colonized the site. No protected tree species as defined under LAMC Ordinance 177,404 were observed on the Project site. Therefore, the proposed Project would not conflict with local policies or ordinances protecting biological resources and the impact would be less than significant and no mitigation measures are warranted.

The proposed Project would involve the removal of all existing vegetation from the Project site. The Specific Plan requires that one tree be provided on-site for every dwelling unit. If this cannot be accomplished, it is possible for the Project Applicant to provide 50 percent of the required trees on-site and provide the difference off-site pursuant to Appendix D Section C 2 of the Specific Plan. Implementation of the proposed Project would replace more than half of the total number of required trees (more than 87 trees [81 trees on-site and 6 trees in the parkway]), which is permitted "by right" and would pay in-lieu fees for the remainder. Potential impacts resulting from the removal of mature (non-protected) trees at the Project site would be reduced to less than significant with compliance with the established City procedures, thereby resulting in less than significant impacts to mature trees.

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. A significant impact would occur if a project is inconsistent with resource policies of any conservation plans of the types listed above. The Project site and surrounding area 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 to any adopted habitat or conservation plans would occur and no mitigation measures are required. No further analysis of this issue is warranted.

Cumulative Impacts

No Impact. Development of the proposed Project in combination with the 134 related projects would not result in a significant impact to sensitive biological resources, including wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat is expected to occur in the Project site vicinity due to the high level of existing urban development. Also, no City of Los Angeles protected trees exist on the Project site. Impacts resulting from the removal of mature non-protected trees at the Project site, as well as the sites of the related projects, would be reduced to less than significant with compliance with the established City procedures, as set forth above, thereby resulting in less than significant cumulative impacts to mature trees.

The Central region of Los Angeles is highly urbanized and no substantial areas of natural habitat for plants and animals are evident in the area where the related projects are proposed. As such, development of the proposed Project in combination with the 134 related projects would not have the potential to have

an adverse effect on any riparian habitat, or federally-protected wetlands, or the potential to interfere with any fish or wildlife corridors or habitat, or conflict with any local ordinances protecting biological ordinances or with an adopted or approved Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the proposed Project would not contribute to a cumulatively significant impact related to biological resources and no impact is expected to occur. As such, no mitigation measures are required and no further analysis of this issue is warranted.

5. CULTURAL RESOURCES

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

No Impact. Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in 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 project could have a significant effect on the environment if it "may cause a substantial adverse change in the significance of an historical resource." A "substantial adverse change" means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is impaired." Material impairment means altering "…in an adverse manner those characteristics of an historical resource that convey its historical significance and its eligibility for inclusion in the California Register of Historical Resources." Impacts to those cultural resources not determined to be significant according to the significance criteria described above are not considered significant for the purposes of CEQA. A project-related significant adverse effect would occur if the proposed Project were to adversely affect a historical resource meeting one of the above definitions.

Pursuant to Section 15064.5 of the State CEQA Guidelines, a historical resource (including both built environment and prehistoric archaeological resources) is presumed significant if the structure is listed on the California Register of Historical Resources (CRHR) or has been determined to be eligible for listing by the State Historical Resources Commission. The criteria for eligibility of listing in the California Register are based upon National Register criteria. The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process.[25] The California Register automatically includes the following: 1) California properties listed in

[25] *Public Resources Code Section 5024.1.*

the National Register and those formally Determined Eligible for the National Register; 2) California Registered Historical Landmarks from No. 0770 onward; and 3) the California Points of Interest that have been evaluated by the Office of Historical Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

To be eligible for listing in the California Register, a property must be at least 50 years of age and possess significance at the local, state, or national level. A resource less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance.[26] A historical resource may also be considered significant if the lead agency determines, based on substantial evidence, that the resource meets the criteria for inclusion in the CRHR. The criteria are as follows:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. The resource is associated with lives of persons important in our past;
3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, under National Register Bulletin 15, to be eligible for listing in the National, and, thus, California Registers, "a property must not only be shown to be significant under National Register criteria, but it also must have integrity." Integrity is defined in National Register Bulletin 15 as "the ability of a property to convey its significance."[27] Within the concept of integrity, the National Register recognizes seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting and materials. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.[28]

Field inspection and a records search of the Project site and surrounding area was conducted to determine if the proposed Project has the potential to impact historic resources. No designated landmarks or potential historic resources or City of Los Angeles Historic-Cultural Monuments were identified on or in the immediate vicinity of the Project site; however, the structures on the Project site were evaluated. The following discussion is based on the Beverly Lucas Historic Resource Report (Historic Resource Report), prepared by Christopher A. Joseph & Associates on September 19, 2008. A copy of the Historic Resource Report is provided in Appendix E, Cultural Resource Data, of this Initial Study.

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[26] *California Code of Regulations (CCR) Section 4852.*

[27] *National Register Bulletin #15, pp. 44-45.*

[28] *Public Resources Code Section 4852.*

The Project would involve the demolition of all existing uses on site prior to construction of the proposed Project. The Project site is currently developed with several buildings, including a variety of residential building types and accessory structures. The structures were constructed between the years of 1894/1895 and 1959.[29] The historic significance of the buildings located on the Project site was evaluated, and as discussed in the Historic Resource Report, none of the buildings have been previously evaluated as historic resources subject to CEQA and none of the buildings are currently designated as landmarks at the national, state or local levels, nor have they been identified as significant in a historic resource survey. In addition, based on the reasoning below, none of the buildings appear to qualify for listing in the California Register for lack of historical significance, architectural distinction and physical integrity.

- Criterion 1: The buildings were not the site of any historical events and do not reflect any broad patterns of history. They were part of the residential development that occurred in the area during the early part of the 20th century, but were not a catalyst for that development.
- Criterion 2: Tax Assessor research was conducted to establish the ownership history for each property from the time they were improved through 1960. Based upon subsequent research at the Los Angeles Public Library, it was determined that none of the property owners were significant in our past. The City Directory research revealed that many of the owners did not actually live in the subject buildings. The only owner of historic interest is Charles M. Stimson (1842-1917), a successful noted man in real estate who was well-known for his philantrophy in the Los Angeles and Pasadena area. He owned the lot today referred to as 117 Lucas Avenue. He did not live there, but could have been the one who developed the commercial building. The rest of the buildings on this lot were built later after his death. As such, the buildings are not significant for their association with historically significant persons.
- Criterion 3: None of the buildings are architecturally significant. Original building permits were not available for many of the buildings; therefore, the names of the original architects and builders are unknown. Research did not reveal any of the known owners, designers or builders of the buildings to be "masters." The buildings at 117 to 119 ¾ Lucas Avenue (other than 117) are very modest examples of the Craftsman style. The buildings at 1422 and 1430 Beverly Boulevard are early 20th century vernacular residences with Victorian features. They are unremarkable and lacking in details. The buildings at 117 to 119 ¾ Lucas Avenue (other than 117) are very modest examples of the Craftsman style. The building at 125 Lucas Avenue appears to be a late 19th century structure that was moved to the property; it is only a modest example of its type and lacking in details. Finally, the buildings are ineligible as a historic district because they are not collectively significant in any context.
- Criterion 4: Criterion 4 was not considered in this evaluation as it generally applies to archeological resources.

[29] *As discussed in the Historic Resource Report, the two-story duplex, located at 125 Lucas Avenue, constructed in 1894-1895 was moved to its current location in 1909 from 1003 West 1st Street.*

The Historic Resource Report concluded that no buildings on the Project site qualify as historic resources subject to CEQA. As such, the proposed Project would have no impact on a historic resource. No mitigation measures are required and further analysis of this issue in an environmental impact report is not warranted.

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

Less Than Significant With Mitigation. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant impact could occur if the proposed Project were to destroy archaeological resources which fall under either of these categories.

As mentioned above in Response 5(a), a records search of the Project site and surrounding area was conducted. As determined in the records search, one archaeological site and one isolate within a 0.5 mile radius of the Project site were identified; however, no archeological sites or isolates have been identified within the Project site.[30] According to the City of Los Angeles General Plan Framework EIR, the Project site is not designated as being an archaeological site; however, the site is in close proximity to a designated archaeological survey area.[31]

The Project site is located in a highly urbanized area of the City of Los Angeles and has been subject to past disturbance, including the construction of existing on-site residential uses. Any archaeological resources that may have existed near the site surface are likely to have been disturbed or previously removed. However, deeper excavations than previously performed on the site may result as the proposed Project would involve the demolition of all existing structures and the removal of associated landscaping and parking on site, and the construction of one new structure on site—a multi-family residential building comprised of five residential stories, 153 for-rent dwelling units with associated landscaping, amenities and parking. Parking would be provided within three under-structure parking levels. As such, the possibility exists that deeper lying archeological artifacts may be present that were not recovered during prior construction or other human activity. It is anticipated that via compliance with existing regulations and the implementation of required Mitigation Measure 5-1., the proposed Project's impact on any previously undiscovered archaeological resources would be reduced to a less than significant level.

Mitigation Measure

5-1 In the event that subsurface resources are encountered during the course of grading and/or excavation, all development shall temporarily cease in these areas until the Planning Department

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[30] *Correspondence received from Michelle Galaz, Department of Anthropology, California Historical Resources Information System, California State University, Fullerton, September 10, 2008.*

[31] *Los Angeles Citywide General Plan Framework Draft EIR, Figure CR-1, January 1995.*

of the City of Los Angeles is contacted and agrees upon a qualified archaeologist to be brought onto the Project site to properly assess the resources and make recommendations for their disposition. Construction activities could continue in other areas. If any find were determined to be significant by the archeologist, they shall be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.

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

Less Than Significant With Mitigation. A significant adverse effect could occur if grading or excavation activities associated with the proposed Project would disturb paleontological resources or geologic features which presently exist within the Project site.

Currently, the Project site is occupied by several residential structures with associated parking; thus, there are no unique geologic features located on the Project site. As a result, the proposed Project would not result in any direct or indirect impacts to unique geologic features. According to the City of Los Angeles General Plan Framework EIR, the Project site is not designated as a vertebrate paleontological resource site nor is the site located in a designated vertebrate paleontological resource site area.[32] However according to the City of Los Angeles General Plan Framework EIR, the Project site is located in an invertebrate paleontological resource sensitivity area, potentially containing bedrock where invertebrate fossils are likely to be found.[33]

The Project site is located in a highly urbanized area of the City of Los Angeles and has been subject to past disturbance, including the construction of existing on-site residential uses. Any paleontological resources that may have existed near the site surface are likely to have been disturbed or previously removed. However, deeper excavations than previously performed on the site may result as the proposed Project would involve the demolition of all existing structures and the removal of associated landscaping and parking on site, and the construction of one new structure on site—a multi-family residential building comprised of five residential stories, 153 for-rent dwelling units with associated landscaping, amenities and parking. Parking would be provided within three under-structure parking levels. As such, the possibility exists that deeper lying paleontological resources may be present that were not recovered during prior construction or other human activity. It is anticipated that via compliance with existing regulations and the implementation of required Mitigation Measure 5-2., the proposed Project's direct or indirect impacts on any previously undiscovered paleontological resources would be reduced to a less than significant level.

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[32] *Los Angeles Citywide General Plan Framework Draft EIR, Figure CR-2, January 1995.*

[33] *Los Angeles Citywide General Plan Framework Draft EIR, Figure CR-3, January 1995.*

Mitigation Measure

5-2 A qualified paleontologist, as determined by the Planning Department of the City of Los Angeles, shall monitor future ground-disturbing activities in native soil. In the event that paleontologist resources are discovered during grading and/or excavation, the monitor shall be empowered to temporarily halt or divert construction in the immediate vicinity of the discovery while it is evaluated for significance. Construction activities could continue in other areas. If any find were determined to be significant by the paleontologist, they shall be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.

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

Less Than Significant. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. According to Section 15064.5 of the State CEQA Guidelines, all human remains are a significant resource. Section 15064.5 of the State CEQA Guidelines also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered.

No known human burials have been identified on the Project site or within recorded resources located in the vicinity. However, it is possible that unknown human remains could occur on the Project site, and if proper care is not taken during Project construction, damage to or destruction of these unknown remains could occur. Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Los Angeles County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendent (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, re-intern the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC. The Project is required to comply with these procedures of conduct following the discovery of human remains and therefore, Project impacts on human remains would be less than significant and no mitigation measures are warranted.

Cumulative Impacts

Less Than Significant With Mitigation. Cumulative impacts on historic resources evaluate whether impacts of the proposed Project and 134 related projects, when taken as a whole, would substantially diminish the number of extant resources within the same or similar context or property type. As discussed above in Response 5(a), the Project site and immediate vicinity do not contain any known historic resources. It is not known at this time if future development of the related project sites would involve historic resources. However, it is anticipated that if historic resources are potentially affected, the related projects would be subject to the requirements of CEQA and City of Los Angeles historic resource protection ordinances. It is further anticipated that the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Consequently, cumulative impacts on historic resources as a result of related project development are expected to be less than significant and thus, when evaluated in conjunction with the proposed Project would not be cumulatively considerable.

As discussed above in Response 5(b), the Project site and immediate vicinity do not contain any known archaeological resources. Furthermore, if unknown archaeological resources are discovered, the proposed Project requires the implementation of Mitigation Measure 5-1 to reduce any potential impacts to a less than significant level. It is not known at this time if future development of the related project sites would involve archaeological resources. Development of the related projects would also require grading and excavation that could potentially affect archaeological resources. However, it is anticipated that if archaeological resources are potentially affected, the related projects would be subject to the requirements of CEQA and City of Los Angeles archeological resource protection ordinances (same as the proposed Project). It is further anticipated that the effects of cumulative development on archeological resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Consequently, cumulative impacts on archeological resources as a result of related project development are expected to be less than significant and thus, when evaluated in conjunction with the proposed Project would not be cumulatively considerable.

As discussed above in Responses 5(c) and 5(d), the Project site has the potential to contain unknown paleontological resources or human remains, and any potential impacts would be reduced to a less than significant level with adherence to required Mitigation Measure 5-2. Development of the related projects would also require grading and excavation that could potentially affect paleontological resources or human remains. The cumulative effect of these projects would contribute to the continued loss of subsurface cultural resources, if these resources are not protected upon discovery. CEQA requirements for protecting paleontological resources and human remains are applicable to development in the City of Los Angeles, as are local cultural resource protection ordinances. If subsurface cultural resources are protected upon discovery as required by law (same as for the proposed Project), impacts to those resources would be cumulatively less than significant and would not be cumulatively considerable.

Eventual realization of the related projects and their impacts upon cultural resources would be determined on a case-by-case basis; although, it is not expected that the related projects would cause a significant

environmental impact due to the urbanization of the area. Therefore, the proposed Project would not contribute to any potential cumulative impacts to cultural resources, and cumulative impacts to cultural resources would be less than significant with required mitigation.

6. GEOLOGY AND SOILS

The following analysis is based upon the Updated Geotechnical Engineering Investigation (Geotechnical Study), prepared by Geotechnologies, Inc., November 21, 2007. A copy of the Geotechnical Study is provided in Appendix F, Geotechnical Data, of this Initial Study.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. A significant impact may occur if a project is located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed. The Project site is located in the seismically active region of southern California, within the Peninsular Ranges Geomorphic Province, which is characterized by northwest trending mountain ranges and valleys. Tectonics of this region are controlled by the strike slip motion of the Pacific and North American crustal plates. Historic seismic records indicate that 66 earthquakes of magnitude 5.0 and greater have occurred within 60 miles of the Project site between the years of 1800 and 2005.

There are no active or potentially active faults identified by the State as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map that are known to be present beneath the Project site. Additionally, the City of Los Angeles Seismic Safety Element does not include the Project site within an Alquist-Priolo Earthquake Fault Zone (referred to as "Special Study Zone" prior to 1994) or Fault Rupture Study Area.[34] The California Division of Mines and Geology indicates that the Project site is within approximately 3.7 miles of the Hollywood Fault. The nearest active fault to the Project site is the Puente Hills Blind Thrust Fault, located less than 6.2 miles from the Project site. Roughly 25 miles in length, the Puente Hills Fault does not break surface sediments, but is likely responsible for the chain of low rises from Santa Fe Springs to the Coyote Hills and has been attributed to the Whittier Narrows Earthquake of 1987. Additionally, the Upper Elysian Park Blind Thrust Fault, which likely overlies the Puente Hills Blind Thrust Fault, is likely responsible for the uplift of the Elysian, Repetto, and Monterey

[34] *City of Los Angeles General Plan, Safety Element, Exhibit A: Alquist-Priolo Special Study Zones & Fault Rupture Study Areas in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, July 9, 2008.*

Park Hills. Due to the buried nature of blind thrust faults, their existence is usually not known until they produce an earthquake; however, the risk of surface rupture of these thrust faults is inferred to be low.

As the Project site is located in a seismically active region, the proposed Project is required to conform to all applicable provisions of the City Building Code, State of California Building Code, and International Building Code (IBC) with respect to new construction. As no active faults are located within or adjacent to the Project site, there is little probability of surface rupture occurring on the Project site. Therefore, impacts associated with fault rupture would be less than significant and no mitigation measures are required.

(ii) Strong seismic ground shaking?

Less Than Significant Impact with Mitigation. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Ground shaking is a seismic hazard that can cause damage to structures.

Although the Project site is not within an Alquist-Priolo Zone, as with all properties in the seismically active Southern California region, the Project site is susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Project site is moderate to strong ground shaking on one of the local regional faults.

However, the proposed Project is required to conform to all applicable provisions of the City Building Code, State of California Building Code, and the IBC. Conformance with required regulations and implementation of the Mitigation Measure 6-1 identified below would ensure the potential for structures on the Project site to sustain damage during an earthquake event, and Project impacts related to ground shaking would be less than significant.

Mitigation Measure

6-1 The proposed Project shall implement all recommendations for building design features included in the Geotechnical Study prepared for the Project.

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

No Impact. A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the Project. Soil liquefaction, the condition in which soils below the groundwater table temporarily lose their solid state, results from loss of strength during cyclic loading, such as that imposed by earthquakes. If the liquefying level is near the surface, the effects can be much like that of quicksand on any structure located on it. If the layer is in the subsurface, it may provide a sliding surface for the material above it. Liquefaction typically occurs in areas where the groundwater is less than 50 feet from

the surface, and where the soils are composed of poorly consolidated, fine- to medium-grained sand. In addition to the necessary soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to initiate liquefaction.

The Project site is located on a moderately inclined, east- and northeast-facing slope. Site elevations vary from 393 to 338 feet for a total elevation difference of 55 feet. A very steep unsupported slope, 20 feet high, is located along West Beverly Boulevard. As part of the Geological Study, to sufficiently observe the bedrock and obtain bedding attributes of the Project site, three test pits were excavated to a maximum depth of seven feet. Geologic materials encountered include fill from previous grading, cohesive colluvium, and sedimentary bedrock of the Puente Formation. The fill varies in thickness up to two feet. The colluvium is comprised of silty clay that is firm to stiff and is very porous with root holes. Colluvium was observed to a maximum depth of 1 ¾ feet. The bedrock underlying the site is relatively shallow and is composed of interbedded clayey siltstone, siltstone, and sandstone and is moderately hard in consistency. The upper two to three feet of the rock is very weathered and fractured and becomes less weathered with depth.

According to the City, the Project site is not located within a "Liquefiable Area" (recent alluvial deposits, with groundwater less than 30 feet deep), nor within a "Potentially Liquefiable Area" (recent alluvial deposits, with groundwater between 30 and 50 feet deep).[35] At the Project site, water seepage was encountered at depths of 33 and 37 feet below the ground surface at elevations of 351 and 348 feet, which correspond to elevations below the proposed finish floor elevation. Water seepage may be encountered at shallower depths elsewhere on the Project site. Fluctuations in the level of groundwater may occur due to variations in rainfall, temperature, and other factors. High groundwater levels could result in changed conditions. A map of Historically Highest Groundwater Levels does not include the Project site, presumably due to the relatively shallow occurrence of bedrock.

The Geological Study recommends that the proposed residential structure be supported in competent bedrock, as the colluvium and fill are not suitable for support of building foundations. The footings of the proposed Project will extend into the Puente Formation bedrock, which is not considered to be subject to liquefaction, due to its moderately hard consistency and long tectonic history. Therefore, the potential for liquefaction to affect the proposed Project is considered non-existent, no impact would occur and no mitigation measures are required.

(iv) Landslides?

No Impact. A significant impact may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Steep slopes, shallow soil development, excess water, and lack of shear strength in an area can result in slope instabilities and landslides.

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[35] *City of Los Angeles General Plan, Safety Element, Exhibit B: Areas Susceptible to Liquefaction in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, July 14, 2008.*

As discussed above in Response 6(a)(iii), the Project site is located on a moderately inclined, east- and northeast-facing slope and includes sloping topography, with site elevations varying between 55 feet. A very steep unsupported slope, 20 feet high, is located along West Beverly Boulevard. However, the Project site is not within a Landslide Inventory or Hillside Area,[36] but is located within a "Hillside Grading Ordinance Exemption Area."[37] No landslides have been mapped or observed on or adjacent to the Project site. Since the proposed structure would be constructed near to the site boundaries, all existing slopes on site will be removed. The resulting cuts in the soil and bedrock will be supported by temporary shoring or the permanent walls of the proposed structure. Therefore, no impact associated with landslides is anticipated to occur and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosion effects of wind or water for a protracted period of time. During construction activities, particularly during excavation for the subterranean levels and grading, the amount of impervious surfaces would be reduced, increasing the potential for wind-borne erosion. Additionally, there is a potential for erosion to occur during the grading process in periods of heavy precipitation.

Although development of the proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced through implementation of stringent erosion controls imposed during grading and building permit regulations. Regulatory measures are required to be implemented during construction periods to minimize wind and water-borne erosion (see Response 3(b) (Air Quality) above and Response 8(a) (Hydrology and Water Quality) below). All grading activities would require grading permits from the Department of Building and Safety, which would include requirements and standards designed to limit potential impacts to acceptable levels. On-site grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the LAMC which addresses grading, excavations, and fills. Additionally, construction activities must meet the National Pollution Discharge Elimination System (NPDES) requirements for storm water quality and comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). The SWRCB mandates that projects that disturb one or more acres of soil or less than one acre but are part of a larger development disturbing one or more acres must obtain coverage under the Statewide General Permit for Discharges of Storm Water Associated with Construction Activity. The General Permit requires that prior to construction activity project applicants file a Notice of Intent (NOI) with the SWRCB and prepare a project-specific Storm Water Pollution Prevention Plan (SWPPP) that incorporates Best Management Practices (BMPs) to control erosion and to protect the quality of surface water runoff during the construction period. Because the grading and

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[36] *City of Los Angeles General Plan, Safety Element, Exhibit C: Landslide Inventory & Hillside Areas in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, July 15, 2008.*

[37] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org, May 21, 2008.*

excavation required for the proposed Project would involve a footprint of greater than one acre, the proposed Project would be required to file a NOI and prepare a SWPPP.

The potential for soil erosion during the operation of the proposed Project is relatively low due to the fact that the Project site would be almost entirely developed with structures, paved areas and landscaping.

With implementation of the applicable grading and building permit requirements and the application of Best Management Practices (BMPs) outlined in the site-specific SWPPP, impacts associated with soil erosion and loss of topsoil would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. 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.

The Project site is not known to be located on a geological unit or soil that is unstable. As previously discussed, subsurface conditions generally consist of firm to stiff colluvium to a maximum depth of 1 ¾ feet, and moderately hard bedrock found thereafter. The soil is not expected to become unstable as a result of the proposed Project; however, excavations could be as much as 40 feet in depth and would expose colluvium, and well-bedded claystone, siltstone, and sandstone bedrock. Potential impacts with respect to liquefaction and landslide potential were determined to have no impact based on the analysis presented in Responses 6(a)(iii) and (iv) above. With respect to lateral spreading, subsidence, or collapse, dynamic compaction of dry and loose sands can occur during an earthquake. Typically, settlements occur in thick beds of such soils. The proposed structure would be supported by the Puente Formation bedrock. Due to the dense and consolidated consistency of the underlying bedrock, dynamic compaction settlement is not expected, though localized settlement of compacted fills may be anticipated in the event of strong ground shaking.

Construction of the proposed Project would comply with the would conform to all applicable provisions of the City Building Code, State of California Building Code, and International Building Code (IBC) with respect to new construction. These provisions are designed to assure safe construction and include building foundation requirements appropriate to the conditions present at the Project site. Impacts associated with lateral spreading, subsidence, or collapse are expected to be less than significant; however, the Project Applicant shall implement the Mitigation Measure 6-1 above and implement the recommendations in the Geological Study prepared for the Project to reduce potential impacts from unstable soils.

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Areas prone to liquefaction tend to have both alluvial soil and ground water levels close to the surface, which results in expansive soil.

As discussed in Response 6(a)(iii) above, water seepage was encountered at depths of 33 and 37 feet below the ground surface at elevations of 351 and 348 feet, which correspond to elevations below the proposed finish floor elevation. The Expansion Index of the remolded bedrock was found to be 118, 102 and 60 from samples taken from bedrock cuttings on the Project site, which is considered to be in the high to moderate expansion range, respectively.

Furthermore, safe construction would be assured through compliance to all applicable provisions of the City Building Code, State of California Building Code, and International Building Code (IBC) with respect to new construction, which include building foundation requirements appropriate to site conditions, and Project impacts would be less than significant and no mitigation measures are required.

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

No Impact. A significant impact may occur if a project is located in an area not served by an existing sewer system.

The Project site is located in a developed area of the City, which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Geotechnical impacts related to future development in the City would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the proposed Project and the related projects identified in Section II, Project Description, of this Initial Study. Nevertheless, cumulative development in the area 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 reduced to a less-than-significant level. Therefore, the proposed Project would not contribute to a cumulatively significant impact, and cumulative geology and soil impacts would be

less than significant. As such, no mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

7. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. A significant impact may occur if a project involves the use or disposal of hazardous materials as part of its routine operations that may have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Project construction activities may increase the use of typical construction materials, including paints, cleaning materials, and vehicle fuels, which may be hazardous if not properly transported, used, or disposed of. The use of these materials would be short term and would occur in accordance with standard construction practices and manufacturer guidelines. Construction activities would, therefore, not create a hazard to the public or environment through the routine transport, use, or disposal of hazardous materials and impacts would less than significant. The operation of the proposed Project would involve the use of minimal amounts of hazardous materials for routine cleaning typical of residential uses. All potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. With compliance with existing local, state, and federal regulations, the transport and storage of these materials would not pose a significant hazard to the public or the environment. Therefore, Project impacts related to this issue would be less than significant. No mitigation measures are required and no further analysis of this issue is warranted.

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 with Mitigation. A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. The proposed Project would involve the demolition of all existing uses on the Project site and the construction of a residential land use. Potentially hazardous materials that would likely be stored and used on the Project site include typical household cleaning solvents, paints and lacquers, and household pesticides, which, when stored and used in small quantities, would not pose a risk of upset or significant environmental impact.

Asbestos Containing Materials (ACM), Lead-Based Paint (LBP) and Polychlorinated Biphenyls (PCB)

Due to the age of the existing structures on the Project site, which range between 1894 and 1959, the potential for encountering asbestos containing materials (ACM) and lead-based paint (LBP) during Project demolition activities exists. Consequently, construction activities may have the potential to

expose construction works and sensitive receptors in the Project area to hazards associated with the demolition and removal of areas containing ACMs, LBP, or polychlorinated biphenyls (PCBs) which could be associated, for example, with lighting fixtures and systems. According to the Asbestos Survey prepared for the Project site by H2 Environmental Consulting Services, Inc. on December 29, 2006 (see Appendix G, Hazards and Hazardous Materials, of this Initial Study), structures on the Project site have asbestos containing materials. Prior to the demolition of the existing on-site uses, the Project Applicant would conduct additional surveys of all on-site structures and facilities to verify the presence or absence of any of LBP and PCBs, and conduct remediation or abatement before any disturbance occurs. Prior to the issuance of a demolition permit, the Project Applicant would provide a letter to the Department of Building and Safety from a qualified lead-based paint and polychlorinated biphenyls abatement consultant(s) that no LBPs and/or PCBs are present in the buildings (see Appendix G of this Initial Study). Mandatory compliance with applicable federal and state standards and procedures, including (but not limited to) the EPA, SCAQMD, and Cal/OSHA, would, therefore, reduce risks associated with asbestos, LBP, and PCBs to less than significant levels.

Mitigation Measure

7-1 Pursuant to mandatory regulatory compliance the Project Applicant shall abide by EPA, SCAQMD, the Cal/OSHA Construction Safety Orders, California Code of Regulations, Title 8, Section 1532.1 and with the California Health and Safety Code, Division 20, Chapter 6.5 for the evaluation, handling and transport of materials containing hazardous substances.

Methane

The City of Los Angeles Department of Building and Safety (LADBS) has established a Methane Ordinance (Ordinance), which details the development requirements for projects located in designated methane zones. Pursuant to the Ordinance, building permits may be issued upon submittal of detailed plans that show adequate protection against flammable gas incursion by providing the installation of suitable methane mitigation systems. According to the City of Los Angeles, the Project site is located within a designated Methane Zone.[38] While non-pressurized methane is normally not problematic, if the gas accumulates to high concentrations and becomes pressurized, detectable levels may enter the interior of a structure through cracks or other penetrations present in floor slabs.

A Report of Subsurface Methane Gas (Methane Report) was prepared for the Project site by Methane Specialists on October 12, 2007 and is included in Appendix G, Hazards and Hazardous Materials Data, of this Initial Study. Slightly significant gas concentrations and gas pressure were detected at all of the probes analyzed in the Methane Report. Accordingly, the proposed Project would therefore be required to comply with the requirements of Design Level II pursuant to the City of Los Angeles Methane Code (Methane Code), which would require the proposed Project to incorporate a passive methane mitigation

[38] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org, March 21, 2008.*

system and a horizontal membrane and venting system. In addition to the other items listed in this section, the Project would implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval. Compliance with these regulations, and the Methane Code would ensure impacts associated with methane would be less than significant.

Mitigation Measure

7-2 Pursuant to mandatory regulatory compliance the Project Applicant shall abide by Design Level II standards as presented in the City of Los Angeles Methane Code, which would require the Project to incorporate a passive methane mitigation system, a horizontal membrane and venting system, trench dams and utility seal-offs. Additionally, at the design level phase, the Project shall implement the engineer's design recommendations subject to the approval of the Department of Building and Safety, and the City of Los Angeles Fire Department.

Dewatering

Development of the Project could require dewatering and non-stormwater related discharges, in particular during the construction of the subterranean parking. In general, the Construction General Permit authorizes construction dewatering activities and other construction related non-stormwater discharges as long as they (a) comply with Section A.9 of the General Permit, (b) do not cause or contribute to violation of any water quality standards, (c) do not violate any other provisions of the General Permit, (d) do not require a non-stormwater permit as issued by the RWQCB, and (e) are not prohibited by a Basin Plan provision. Full compliance with applicable federal, state, and local water quality standards by the Project applicant, as required under existing laws and regulations, would assure that potential impacts from dewatering discharges are not significant. However, because dewatering would only occur temporarily, as needed during construction, no long-term impacts are anticipated. Therefore, impacts related to dewatering would be considered less than significant and no mitigation measures are required.

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. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Project site is located less than 0.01 miles from the nearest school. The Project site is located to the east of Belmont Senior High School, across South Witmer Street, which runs adjacent the western edge of the Project site. As stated in Response 7(a), the proposed Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance and, with compliance with existing local, state, and federal regulations, the routine transport, use, and disposal of these materials would not pose a significant hazard to the public or the environment. Therefore, impacts associated with the emission of hazardous materials near an existing or proposed school would be less than significant and no mitigation measures are required. No further analysis of this issue is warranted.

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 from which there is known migration of hazardous waste and submit such information to the State 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. The Project site is not included on any of the lists referenced in this question.[39] Additionally, the Project site is not located immediately adjacent to any sites listed in the aforementioned databases. Therefore, the Project is not anticipated to create a hazard to the public or the environment and impacts would be less than significant. No mitigation measures are required and no further analysis of this issue is warranted.

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

No Impact. A significant project-related impact may occur if the proposed Project were placed within a public airport land use plan area (i.e., County of Los Angeles Airport Land Use Plan), or within two miles of a public airport, and would subject persons to a safety hazard. The nearest public use airports, including the Santa Monica Airport, Bob Hope Airport in Burbank, and the Los Angeles International Airport, are located approximately eleven miles northwest and southwest of the Project site. Furthermore, the Project site is not located within an airport land use plan boundary.[40] Therefore, no impact would occur and no mitigation measures are required. As such, further analysis of this issue is not warranted.

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 the proposed Project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The proposed Project is not located in the vicinity of a private airstrip. Therefore, no impact would occur. No mitigation measures are required and further analysis of this issue is not warranted.

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[39] *State of California, Department of Toxic Substances Control, website: http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, July 15, 2008.*

[40] *Los Angeles County Department of Regional Planning, Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, website: http://planning.co.la.ca.us/spALUC.htm, July 15, 2008.*

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. Several streets within vicinity of the proposed Project are designated as a Selected Disaster Route in the Safety Element of the City of Los Angeles General Plan, including West Beverly Boulevard on which the Project fronts, West Sunset Boulevard to the north, South Hoover Street/South Alvarado Street to the west, and North Beaudry Avenue to the east of the Project site.[41] Disaster routes function as primary thoroughfares for the movement of emergency response traffic and access to critical facilities. Although the Project site is situated in the vicinity of these streets, the construction or operation of the Project would not require or result in any modifications to any of the aforementioned roadways. With the exception of potentially utilizing these streets during construction for the movement of construction vehicles, the Project would not intrude upon these roadways. The majority of construction activities for the Project would be confined to the site, except for infrastructure improvements, which would require some work in adjacent street rights-of-way. Since the Project would not cause the impediment of the City's designated disaster evacuation routes, nor would other elements of the Project's residential uses impair implementation of the City's emergency response plan, the Project would have a less-than-significant impact with respect to these issues. It is recommended that the Project Applicant submit an emergency response plan for approval by the decision maker and the Fire Department. The emergency response plans shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. No mitigation measures are required and no further analysis of this issue is warranted.

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. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project site is not located in a Very High Fire Hazard Severity Zone as designated by the Los Angeles Fire Department.[42] The Project site is located in the urbanized Westlake area of the City that does not include wildlands or high fire hazard terrain or vegetation. Therefore, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland

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[41] *City of Los Angeles General Plan, Safety Element, Exhibit H: Critical Facilities and Lifeline Systems in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, July 15, 2008.*

[42] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org, May 21, 2008.*

fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No mitigation measures are required and no further analysis of this issue is warranted.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed Project in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the Project area. However, as discussed above, the proposed Project would not use, store, transport, or otherwise accidentally release any hazardous materials that would have the potential to result in upset environmental conditions. With respect to the related 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 these properties. Further, local municipalities are required to follow local, State and federal laws regarding hazardous materials. Therefore, assuming compliance with local, State and federal laws pertaining to hazardous materials, cumulative impacts would be less than significant and no mitigation measures are required. No further analysis of this issue is warranted.

With respect to hazards from wildfires, the Project site and the sites of the 134 related projects are situated throughout the highly urbanized Westlake, West Los Angeles, and Century City areas of the City that do not include wildlands or high fire hazard terrain or vegetation. Therefore, no cumulative wildfire impact would occur. No mitigation measures are required and no further analysis of this issue is warranted.

8. HYDROLOGY AND WATER QUALITY

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

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water 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

Construction activities must meet the National Pollution Discharge Elimination System (NPDES) requirements for storm water quality and comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). The SWRCB mandates that projects that disturb one or more acres of soil or less than one acre but are part of a larger development disturbing one or more acres must obtain coverage under the Statewide General Permit for Discharges of Storm Water Associated with Construction Activity. The General Permit requires that,

prior to construction activity, Project Applicants file a Notice of Intent (NOI) with the SWRCB and prepare a project-specific Storm Water Pollution Prevention Plan (SWPPP) that incorporates Best Management Practices (BMPs) to control erosion and to protect the quality of surface water runoff during the construction period. Construction-phase housekeeping measures for control of contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides would be contained within the Project SWPPP.

Operation

The proposed Project does not include any point-source discharge. As per National Pollution Discharge Elimination System (NPDES) requirements, a Standard Urban Storm Water Mitigation Plan (SUSMP) was adopted for Los Angeles County and 85 cities, including the City of Los Angeles. The Los Angeles Regional Water Quality Control Board (LARWQCB) issued a Municipal Storm Water NPDES Permit in December 2001 that requires new development and redevelopment projects to incorporate storm water mitigation measures. Depending on the type of project, either a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves the site. SUSMPs are required for single-family hillside residences, residential developments of ten or more units, industrial/commercial developments of one or more acres, automotive service facilities, retail gasoline outlets, restaurants, parking lots of 5,000 or more square feet or larger or with 25 or more parking spaces, and projects discharging directly into designated Environmentally Sensitive Areas (ESA). As the proposed Project would involve a residential development of more than 10 units and subterranean parking with 25 or more parking spaces, the Project Applicant would be required to prepare a SUSMP to reduce potential surface water quality impacts during operation.

Through preparation and implementation of both the SWPPP Plan and the SUSMP, water quality impacts of the Project would be minimized. Therefore, Project impacts would be less than significant, no mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement, withdrawal of groundwater, or the paving of existing permeable surfaces that are located above groundwater basins.

Construction/Excavation-Related Impacts

Construction of the proposed Project would involve the demolition of the existing buildings and their replacement with a new residential development. Additionally, the proposed Project would also require excavation to a depth of approximately 35 to 40 feet below ground surface (bgs) to provide footings, foundations and subterranean walls to support the proposed three under-structure parking levels, parking structure and buildings. As discussed in Response 6(a)(iii) above, the Project site is not located in a "Liquefiable Area" or a "Potentially Liquefiable Area". According to the Geotechnical Study,[43] water seepage was encountered at the Project site at depths of 33 and 37 feet bgs at elevations of 351 and 348 feet, which correspond to elevations below the proposed finish floor elevation. Water seepage may be encountered at shallower depths elsewhere on the site. Fluctuations in the level of groundwater may occur due to variations in rainfall, temperature, and other factors. A map of Historically Highest Groundwater Levels does not include the Project site, presumably due to the relatively shallow occurrence of bedrock. Therefore, excavation for the proposed under-structure parking is not anticipated to contact or interfere with the groundwater table. Nonetheless, during the Project's construction phase, temporary dewatering of portions of the Project site would be required to allow construction of the subterranean parking. The excavation would extend below ground surface and within the groundwater level. The water is anticipated to flow from fractures in the bedrock and will likely yield low flows for a limited time. During foundation excavation, seepage would not be permitted to pond or accumulate.[44] To minimize the possibility of encountering disruptive groundwater during the excavation, groundwater levels may be lowered with sufficient anticipation to provide optimum excavation conditions. This may be achieved via temporary dewatering wells throughout the site, if deemed necessary. However, because dewatering would only occur temporarily, as needed during construction, no long-term impacts are anticipated.

Operational Impacts

The proposed Project does not propose any groundwater wells or pumping activities. All water supplied to the site will be derived from the City's existing water supply and infrastructure. The Project site is almost entirely covered by impervious surfaces, such as buildings, asphalt parking areas, and cement walkway, so it is not expected that there would be a substantial increase in impervious surface area upon completion of construction. Thus, during a storm event most water that encounters the site runs off from the site to the local stormdrain system or into landscaped areas.

Therefore, the proposed Project would not substantially alter groundwater recharge or deplete groundwater supplies and impacts associated with this issue would be less than significant and no mitigation measures are warranted.

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[43] *Updated Geotechnical Engineering Investigation, Geotechnologies, Inc. Consulting Geotechnical Engineers, November 21, 2007 (included in Appendix F of this Initial Study).*

[44] *Updated Geotechnical Engineering Investigation, Geotechnologies, Inc. Consulting Geotechnical Engineers, November 21, 2007 (included in Appendix F of this Initial Study).*

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the Project.

Construction Impacts

The Project site is almost entirely covered by impervious surfaces and most of the runoff flows to the local stormdrain system during a storm event. As discussed in Response 8(b) above, construction of the proposed Project would involve excavation to a depth of approximately 35 to 40 feet bgs to facilitate a three-level under-structure parking garage. Therefore, construction of the proposed Project would have the potential to increase the amount of erosion generated at the Project site due to altered drainage patterns. Nonetheless, adherence to the regulations outlined in response to Response 8(a) short-term construction impacts associated with erosion would be less than significant. As such, no mitigation measures are required and no further analysis of this issue is warranted.

Operational Impacts

As stated previously, the Project site is almost entirely covered by impervious surfaces and most of the runoff flows to the local stormdrain system during a storm event. Although the proposed Project would increase the amount of impervious surfaces at the site (see previous discussion), the amount of runoff from the site would not substantially change, and all the runoff associated with the proposed Project would be either directed to landscaped areas or directed to the existing stormdrain system and would not encounter unprotected soils. During Project construction, a temporary alteration of the existing on-site drainage pattern may occur. However, these changes would not result in substantial erosion or siltation due to stringent controls imposed via City grading and building permit regulations as discussed under Response 8(a) above. As such, any alteration of the existing drainage pattern would not result in substantial erosion or siltation on- or off-site and Project impacts related to this issue would be less than significant. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

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. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions that would adversely impact the Project site or nearby properties. The Project site is located in an urbanized area of the City and is currently developed with several single- and multi-family residential structures. As

discussed in Response 8(c) above, the Project site is served by existing served by existing City storm drain infrastructure. The proposed Project would involve the demolition of the existing residential land uses and their replacement with a new a multi-family residential building comprised of five residential stories, 153 for-rent dwelling units with associated landscaping, amenities and parking. The Project site, under current conditions, is almost entirely covered with impermeable surfaces. Furthermore, the Project site is not located adjacent to any stream or river, and Project runoff would continue to drain into existing City storm drain infrastructure. Therefore, the proposed Project would not have the potential to result in flooding due to altered drainage patterns and impacts would be less than significant. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

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 with Mitigation. A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeded the capacity of the storm drain system serving a project site. A project-related significant impact would also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

The Project area is primarily comprised of existing development with paved roadways and parking lots. As noted, the Project site is almost entirely covered by impervious surfaces. Thus, during a storm event most water that encounters the site either percolates through existing impervious surfaces or runs off from the impervious surfaces to the local storm drain system or into landscaped areas. With Project implementation, runoff from the Project site would continue to be directed towards existing storm drains in the Project vicinity. Because development of the proposed Project would result in little if any change in the amount of permeable area in the Project vicinity, the proposed Project would not result in an increase of storm water runoff to a level that would exceed the capacity of the storm drain system currently serving the Project site.

As previously noted, there are no stream or river courses located in the vicinity of the Project site. There are no surface drainage control structures (i.e., drainage swales, retention basins) on the site. Existing Project site storm water sheet flows into curbs, gutters, and drain inlets of the adjacent public streets and right-of-ways. This runoff then discharges into a City of Los Angeles municipal storm drain system, which is continuously maintained by the City of Los Angeles.

Due to the existing site conditions and the urbanized location of the Project site, no substantial increase is expected to occur in the rate of surface runoff or the volume of surface runoff when the site is developed as planned. In addition, hydrologic computations for municipal drainage systems are based on drainage areas much larger in size than the size of this Project site, and any peak storm water runoff from the Project site would be within the peak runoff of the municipal system in the vicinity of the Project site. As such, impacts associated with excessive runoff delivered to storm drains would be less than significant and no mitigation measures are warranted.

Refer to Response 8(a) for a discussion of Project impacts related to water quality.

Mitigation Measure

8-1 Pursuant to mandatory regulatory compliance the Project Applicant shall abide by the following:

1) Section 402 (p) of the federal Water Pollution Control Act, or Clean Water Act (CWA);

2) Order No. 01-182 of the Los Angeles Regional Water Quality Control Board, which regulates the issuance of waste discharge requirements to Los Angeles County;

3) the County of Los Angeles Standard Urban Storm Water Mitigation Plan (SUSMP);

4) the Los Angeles Municipal Code (LAMC); and

5) the State Water Resources Control Board (SWRCB), which required the Project Applicant to file a Notice of Intent (NOI) and prepare a Storm Water Pollution Prevention Plan (SWPPP) in compliance with the Statewide General Permit for Discharges of Stormwater Associated with Construction Activity (General Permit). The SWPPP shall incorporate Best Management Practices (BMPs) to control erosion and to protect the quality of surface water runoff during the construction period. The owner of the Project site shall maintain all structural or treatment control BMPs for the life of the Project.

f) Would the project otherwise substantially degrade water quality?

No Impact. A significant impact may occur if a project would include potential sources of water pollutants that would have the potential to substantially degrade water quality. Implementation of the proposed Project could affect the quality of runoff from the Project site. During construction, sediment is typically the constituent of greatest potential concern. The greatest risk of soil erosion during the construction phase occurs when site disturbance peaks due to grading activity and the removal and re-compaction or replacement of fill areas. (Sediment is not typically a constituent of concern during the long-term operation of developments similar to the proposed Project because sites are usually paved, and proper drainage infrastructure has been installed.) Other pollutants that could affect surface-water quality during Project construction include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, rodenticides, etc.).

Once the Project has been constructed, urban runoff might include all of the above contaminants, as well as trace metals from pavement runoff, nutrients and bacteria from pet wastes, and landscape maintenance debris may be mobilized in wet-season storm runoff from roadway areas, parking areas, and landscaping, and in dry-season "nuisance flows" from landscape irrigation. Liquid product spills occurring at the Project site could also enter the storm drain. Dry product spills could enter the storm drain via runoff in

wet weather conditions or dry-season "nuisance flows." Other than the sources discussed above in Responses 8(a) and 8(e), the proposed Project would not include other potential sources of contamination which could degrade water quality. Therefore, the proposed Project would not otherwise degrade water quality and no impact would occur. As such, no mitigation measures are required and no further analysis of this issue is warranted.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact may occur if a project were within a 100-year flood hazard area. The Project site is not located within a flood zone, including, but not limited to, the 100-year flood zone, designated by the Federal Emergency Management Agency (FEMA).[45] Additionally, the Project site is not within either a 100- or 500-year flood plain area, as determined by the City.[46, 47] Therefore, no impacts would occur and no mitigation measures are required. As such, no further analysis of this issue is warranted.

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

No Impact. A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. As discussed under Response 8(g) above, the Project site is not located within a 100- or 500-year flood zone. Therefore, the proposed Project would not introduce structures to an area of high flood risk such that flows would be impeded or redirected and no impact would occur. No mitigation measures are required and no further analysis of this issue is warranted.

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?

No Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. According to the Safety Element of the City's General Plan, the Project site does not lie within a potential inundation

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[45] *Federal Emergency Management Agency, Federal Insurance Administration, National Flood Insurance Program, Flood Insurance Rate Map (FIRM), City of Los Angeles, California, Los Angeles County, Panel 74 of 112, Community Panel Number 060137 0074 C, Effective Date: October 2, 1980.*

(Accessed from: City of Los Angeles Bureau of Engineering, Department of Public Works, NavigateLA, FloodLA, website: http://navigatela.lacity.org/common/mapgallery/pdf/fema_firm/0601370074C.pdf, August 5, 2008.)

[46] *City of Los Angeles General Plan, Safety Element, Exhibit F: 100-Year & 500-Year Flood Plains in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, July 15, 2008.*

[47] *City of Los Angeles Bureau of Engineering, Department of Public Works, NavigateLA, FloodLA, website: http://navigatela.lacity.org/floodgis/index01.cfm, August 5, 2008.*

area,[48] as there are no levees or dams in the Project vicinity. Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, would occur. No mitigation measures are required and no further analysis of this issue is warranted.

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

Less Than Significant Impact. A significant impact may occur if a project site is located sufficiently close to the ocean or other body of water to be potentially at risk of the effects of seismically-induced tidal phenomena (seiche or tsunami), or if the Project site is located adjacent to a hillside area with soil characteristics potentially susceptible to mudslides or mudflows.

According to the City's Safety Element of the General Plan, the Project site is not located within a tsunami hazard area,[49] so there is not potential impact associated with tsunamis. The closest body of water to the Project site is Echo Lake, which is located approximately 0.6 miles north of the Project site. Since the Project site is not located in close proximity to a contained body of water, there is no potential impact associated with a seiche and no mitigation measures are required. No further analysis of this issue is warranted.

With respect to the potential impact from a mudflow, the Project site is surrounded by urban development, but is located in an area with steep slopes and varying topography. As discussed in Response 6(a)(iv) above, the Project site is not within a City-designated Landslide Inventory or Hillside Area, but is located within a "Hillside Grading Ordinance Exemption Area." Therefore, the risks associated with hillside areas would be less at the Project site than in other areas that are designated as Hillside Areas, and the risks associated with mudflow would also be less than would otherwise be anticipated. As such, the proposed Project would have a less-than-significant impact associated with mudflow and no mitigation measures are required. No further analysis of this issue is warranted.

Cumulative Impacts

Less Than Significant Impact. Future development of the related projects could affect the amount, the rate, the velocity, and the quality of runoff within their respective drainage areas. Whether the effects would be positive or adverse would depend on a number of factors including the amount of pervious/impervious surfaces that would change, the duration of the construction period, the drainage improvements and BMPs that would be incorporated into the design, etc. for each of those projects. Nonetheless, similar to the proposed Project, each of the related projects would be required to prepare and implement a SUSMP and undergo a preliminary review by the City to determine what, if any, drainage

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[48] *City of Los Angeles General Plan, Safety Element, Exhibit G: Inundation & Tsunami Hazard Areas in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, July 15, 2008.*

[49] *City of Los Angeles General Plan, Safety Element, Exhibit G: Inundation & Tsunami Hazard Areas in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, July 15, 2008.*

improvements and BMPs would be required to ensure that the stormdrain capacity of the system serving each of the related projects is adequate, and to ensure that no downstream flooding would occur as a result of the exceedance of stormdrain capacity, and to ensure no significant water quality issues. As discussed above, the proposed Project would not result in any significant hydrology and water quality impacts. Therefore, cumulative impacts to hydrology and water quality would be less than significant. As such, no mitigation measures are required and no further analysis of this issue is warranted.

9. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier or other physical division within an established community. A project can physically divide an established community by interrupting or blocking access or by creating a conflict of scale, intensity, or use that would disturb an established community to such a degree that existing uses would not function as under existing conditions. The following evaluation is to determine whether the Project would contain any features or cause any changes that could cause a permanent physical division in the surrounding established community. Physically dividing elements may include land use incompatibility caused by contrasting scale or land use. A typical example would be a Project which involved a continuous right-of-way, such as a roadway which would divide a community and impede access between parts of the community.

The Project site is located approximately one mile northwest of downtown Los Angeles in the existing urban Westlake Community Plan Area. The Project would occupy an approximately 1.26-acre, L-shaped parcel comprised of several smaller lots. The Project site is generally bounded by West Beverly Boulevard, South Lucas Avenue, South Witmer Street, and West 2nd Street, in addition to existing development. The Project site has frontages along West Beverly Boulevard as well as South Lucas Avenue and South Witmer Street, with the longer frontages of the "L" extending along West Beverly Boulevard and South Lucas Avenue.

Land uses adjacent to the Project site include Belmont High School to the west, new two- to three-story multi-family construction to the west, mixed residential and commercial uses to the north across West Beverly Boulevard, and single- and multi-family residences to the south of the Project site, including the adjacent six-story multi-family building. The Project site is currently developed with several single- and multi-family residential structures; three parcels comprising the Project site are currently vacant. The proposed Project would replace the existing on-site uses with a six-story multi-family residential building comprising a total of 153 residential units, with associated landscaping, amenities, and under-structure parking. The residential units would be constructed over three levels of under-structure parking, which would provide a total of 170 parking spaces.

As discussed in Response 1(c) above, the proposed six-story building would increase the general height of buildings on the Project site, but would not exceed the permitted height for the Project site. Because the Project site has two different zonings, the northern and southern portions of the Project site are subject to two different height and Floor Area Ratio (FAR)[50] restrictions. The northern portion of the Project site, zoned RC4(CW)-U/3.7, is limited to a maximum height of 1,218 feet above mean sea level ("amsl") and a maximum FAR of 3.7:1 (3.7 times the buildable area of the Project site). The southern portion of the Project site, zoned R4(CW)-75/3, is limited to a maximum height of 75 feet and a FAR of 3.0:1 (three times the buildable area of the Project site). The LAMC permits an additional 12 feet since the site is located on a slope greater than 20-feet. While the proposed Project is permitted a maximum height of up to 87 feet, the Project is only proposing to provide 78 feet. This is consistent with the LAMC and does not require an entitlement request. However, structures of similar height and massing are located in the vicinity of the proposed Project. At present, the tallest building in the immediate vicinity is the five-story multi-family residential building located adjacent to the south of the Project. Other buildings immediately along West Beverly Boulevard are generally one to three stories in height, though much taller buildings can be seen within the Project area.

The new development would not consist of the placement of a new roadway or other physical barrier, which could physically divide an established community. Additionally, the Project would not cause a conflict of land use that would physically divide an existing community, as the residential land use of the Project would be consistent with multi-family residential land uses within vicinity of the Project site. Though the proposed structure would increase the general height of buildings on the Project site, the Project would be generally consistent with the LAMC and would not be anticipated to divide an established community. Therefore, Project impacts would be less than significant and no mitigation measures are required. As such, no further analysis of this issue is warranted.

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[50] *Floor Area Ratio (FAR) is the ratio the floor area of buildings to the area of the lot on which the building is located; i.e., FAR = (Building Floor Area) / (Site Area).*

(Floor Area is defined in the LAMC as that 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-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas. Therefore, floor area does not include exterior walls, stairs, elevators, shafts, telephone/electric mechanical rooms on each typical floor, and parking areas.)

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with any federal, State, county, or city land use plan and zoning designation currently applicable to the Project site and would cause adverse environmental effects, which these land use plans are designed to avoid or mitigate. Various local and regional plans guide development of the Project site.

At the regional level, the Project site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally-designated metropolitan planning organization. The Regional Comprehensive Plan and Guide (RCPG) of SCAG is a framework for decision-making with respect to regional growth and, through its Growth Management policies, addresses land use within a broader context. Additional SCAG plans also include the Compass Growth Vision, Regional Comprehensive Plan (RCP), and Regional Transportation Plan (RTP). The proposed Project is also located within the South Coast Air Basin (the "Basin") and, therefore, is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), and the Los Angeles County Metropolitan Transportation Authority's (LACMTA) Congestion Management Plan for Los Angeles County (CMP).

At the local level, development of the Project site is guided by the General Plan of the City of Los Angeles, the Westlake Community Plan (Community Plan), the Central City West Specific Plan (Specific Plan), and the City of Los Angeles Municipal Code (LAMC), which are intended to guide local land use decisions and development patterns. The applicable objectives and policies of each of the aforementioned plans are addressed in the following discussion of plan compliance.

Consistency with Regional Plans

SCAG Regional Comprehensive Plan and Guide

The Project site is located within the six-county region that comprises the SCAG planning area. SCAG's Regional Comprehensive Plan and Guide (RCPG) was adopted in 1994 by the member agencies of SCAG to set broad goals for the Southern California region and identify strategies for agencies at all levels of government to use in guiding their decision-making. Additionally, the RCPG is a framework for decision-making with respect to regional growth to year 2015 and beyond, including growth management and regional mobility.

Adopted RCPG policies related to land use are contained primarily in Chapter 3 of the RCPG, entitled "Growth Management." The purpose of the Growth Management chapter is to present forecasts which establish the socio-economic parameters for the development of the Regional Mobility and Air Quality Chapters of the RCPG, and to address issues related to growth and land consumption by encouraging

local land use actions which could ultimately lead to the development of an urban form that would help minimize development costs, save natural resources, and enhance the quality of life in the region.

Compass Growth Vision

The Compass Growth Vision is an implementing mechanism for the regional growth strategies outlined in the RCPG. The Compass Growth Vision is intended to provide a strategy to accommodate the projected six million new residents expected to live in the region by 2030 while balancing valuable quality of life goals. To organize the strategies for improving the quality of life in the SCAG region, the following four principles are identified: mobility, livability, prosperity and sustainability. Decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. The Growth Vision Report also provides policy and planning strategies as a way to achieve each of its principles.

Several areas throughout the SCAG region have been identified as strategic opportunity areas for the application of the Compass Growth Vision principles. These areas are referred to as the "Compass 2% Strategy Opportunity Areas." The Compass 2% Strategy Opportunity Areas represent key areas of the SCAG region with a high potential to implement projects, plans and/or policies consistent with the principles defined in the Compass Growth Vision report.

2008 Regional Comprehensive Plan (RCP)

The 2008 RCP is a guidance document that was developed in response to SCAG's Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving the region's inter-related housing, traffic, water, and air quality challenges. The 2008 RCP incorporates input from the RCP Task Force, SCAG's policy committees and subregions, local governments, and other key stakeholders.

The 2008 RCP defines a vision for the SCAG region that includes balancing resource conservation, economic vitality, and quality of life. It also provides a long-term planning framework that describes comprehensive responses to growth and infrastructure challenges and recommends an Action Plan targeted for the year 2035. The 2008 RCP does not mandate integrated resources planning; however, SCAG does request that local governments consider the recommendations set forth on the RCP in their General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions.

In September 2008, SCAG accepted the RCP as a reference document, but did not adopt its policies. SCAG has recommended that environmental documents continue to analyze projects per the policies in the 1996 RCPG.

2008 Regional Transportation Plan (RTP)

The 2008 RTP entitled "Making the Connections" presents the transportation vision for the SCAG region through the year 2035 and provides a long-term investment framework for addressing the region's transportation and related challenges. The goals of the RTP are to maximize mobility and accessibility, ensure safety and reliability, preserve the existing transportation system, maximize productivity of the transportation system, protect the environment, and encourage land use and growth patterns that complement the transportation system. The RTP also includes policies which reflect the transportation priorities for the SCAG region, and serve to guide plan development. The 2008 RTP ended its public comment period on February 19, 2008. SCAG adopted the 2008 RTP on May 8, 2008.[51]

Applicability of SCAG Plans

It should be noted that the goals and policies of the RCPG, Compass Growth Vision Report, and RTP only address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. 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.

Based on the amount of square footage associated with the Project, no commercial development and 153 residential dwelling units, it would not meet SCAG's criteria for a regionally significant Project.[52] Accordingly, because the proposed Project is not considered to be regionally significant[53] the proposed Project would not be required to demonstrate consistency with SCAG policies contained in the RCPG, Compass Growth Vision Report, RCP, or the RTP.

SCAQMD Air Quality Management Plan

The proposed Project is located within the Basin and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's Air Quality Management Plan (AQMP) was updated in 2007 (adopted June 1, 2007) to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. As stated in Response 3(a) above, the proposed Project generally conforms to the zoning and land use designations for the Project site as identified in the General Plan and, as such, would not add emissions to

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[51] *Southern California Association of Governments, Making the Connections: 2008 Regional Transportation Plan, website: http://www.scag.ca.gov/rtp2008, May 12, 2009.*

[52] *SCAG considers a project to be "regionally significant" if it has a minimium of 250,000 square feet of commercial use or 500 residences. Southern California Association of Governments, Minimum Criteria For Classification Of Projects As Regionally Significant, website: http://www.scag.ca.gov/igr/clist.htm, May 12, 2009.*

[53] *Southern California Association of Governments, Minimum Criteria For Classification Of Projects As Regionally Significant, website: http://www.scag.ca.gov/igr/clist.htm, May 12, 2009.*

the Basin that were not already accounted for in the approved AQMP and no impact would occur. As such, no mitigation measures are required and further analysis of this issue is not warranted.

Congestion Management Program (CMP)

The CMP for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also 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. Within Los Angeles, the Los Angeles County Metropolitan Transportation Authority (Metro) is the designated congestion management agency responsible for coordinating the CMP. The proposed Project's potential impacts with respect to the CMP are analyzed further below in Response 15(b), Transportation/Traffic, of this Initial Study. Project-related impacts to CMP were found to be less than significant; as such, no mitigation measures are required and further analysis of this issue is not warranted.

Consistency with Local Plans

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan) is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas. State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.[54]

Housing Element of the General Plan

Because the proposed Project would involve a multi-family residential development in a mostly residential portion of the community, the General Plan element that would be most applicable to the proposed Project is the Housing Element.

The City of Los Angeles continues to grow, and with that growth comes the need for more housing – not only more housing units, but a broader array of housing types to meet evolving household types and sizes, and a greater variety of housing price points that people at all income levels can afford. The City is committed to accommodating this growth and residential development in a sustainable way, which respects the collection of unique neighborhoods that characterize Los Angeles, while assuring all

[54] *California State Government Code Section 65300.*

residents a high quality of life, a vibrant economy, and accessibility to jobs, open space, and urban amenities. The City's General Plan lays out the strategy to meet this challenge, by directing growth to transit-rich and job-rich centers and supporting the growth with smart, sustainable infill development and infrastructure investments. By integrating the City's housing strategy with its growth strategy, the City supports economic development, reduces housing costs, minimizes environmental impacts, and enhances the quality of life. At the core of this strategy are complete mixed-use, mixed-income neighborhoods strategically located across the City that provide opportunities for housing, jobs, transit, and basic amenities for all segments of the population.[55]

The Housing Element is the City's blueprint for meeting the housing and growth challenge. It identifies the City's housing conditions and needs, reiterates goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City has committed to implement to create sustainable, mixed-income neighborhoods across the City. The Housing Element identifies portions of the project site as a potential housing site in "Appendix H – Inventory and Map of Parcels Available for Housing." As discussed in Section II, Project Description, the proposed Project would include 22 residential units reserved for Low Income households. This would be consistent with the Housing Element which states, "Many more affordable rental units are needed because there are more than 600,000 households with incomes below the median household income for the County of Los Angeles." The Housing Element further concludes that families unable to afford market rents are forced to share units and live in overcrowded conditions in order to afford the rents, or worse, they are forced into homelessness. In addition, illegal housing units may be created that do not meet building and zoning codes, posing safety hazards to occupants and negative impacts on neighborhoods.[56]

Policies

An analysis of the proposed Project's consistency with applicable polices of the Housing Element is summarized below in Table IV-9, Project Consistency with the Applicable Policies of the City of Los Angeles Housing Element 2006 - 2014. The proposed Project would be consistent with the objectives and policies listed above in the Housing Element, as the proposed Project would replace the 13 existing residences (12 multi-family dwelling units and one single-family residential dwelling unit) with 153 multi-family residential units within a mostly urbanized area the City, for a net increase of 140 units. Furthermore, the proposed Project would be consistent with the existing character and scale of adjacent development, which consists primarily of single- and multi-family residential uses with interspersed retail and commercial uses. As shown herein, the proposed Project would be consistent with the goals and policies of the Housing Element.

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[55] *Los Angeles Department of City Planning, Housing Element 2006 -2014, August 13, 2008.*

[56] *Los Angeles Department of City Planning, Housing Element 2006 -2014, August 13, 2008.*

Table IV-9
Project Consistency with the Applicable Policies of the City of Los Angeles
Housing Element 2006 - 2014

Policy	Consistency Discussion
Policy 1.1.2: Promote affordable rental housing for all income groups that need assistance.	**Consistent:** Development of the proposed Project would include 153 multi-family dwelling units of which 15 percent or up to 22 units would be restricted to Low Income residents.
Policy 1.1.3: Facilitate new construction of a variety of housing types that address current and projected needs of the city's households.	**Consistent:** Development of the proposed Project would include 153 multi-family dwelling units in the Project area. A variety of floor-plan layouts, including one- and two bedroom units, loft units, and a studio unit would be offered to potential residents. Furthermore, 15 percent of the 153 apartments would be reserved for Low Income households.
Policy 1.1.4: Expand location options for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.	**Consistent:** Development of the proposed Project would include 153 multi-family dwelling units in an area that is currently served by five Metro (Los Angeles County Metropolitan Transportation Authority) and two DASH routes (the City of Los Angeles DASH service). **Metro Bus** • Metro operates one Metro Rapid Bus Line past the site. Line 714 runs along Beverly Boulevard and 1st Street in the immediate vicinity of the Project site and connects Beverly Hills to Downtown Los Angeles. • Metro Line 14 also runs in the immediate vicinity of the Project site. Line 14 runs along Beverly Boulevard and 1st Street and connects Beverly Hills to Downtown Los Angeles. • Metro operates three other bus lines in the area of the Project. These include Line 10, which runs along Temple Street and connects West Hollywood and Downtown Los Angeles; Line 16/316, which run along 3rd Street and connect Century City, Hancock Park, Westlake, and Downtown Los Angeles. **City of Los Angeles - DASH** • The DASH– Route F runs along 3rd Street, Beaudry Avenue, and 4th Street and connects to Exposition Park. • The DASH–Pico Union/Echo Park Route runs along 3rd Street, Lucas Avenue, and 6th Street and connects to Echo Park and Washington Boulevard & Grand Avenue. Furthermore, the Project would improve the streetscape appearance along West Beverly Boulevard and South Lucas Avenue to make it more inviting and walkable for new and existing residents of the Project area.

Table IV-9
Project Consistency with the Applicable Policies of the City of Los Angeles
Housing Element 2006 - 2014

Policy	Consistency Discussion
Policy 1.2.3: Rehabilitate and/or replace substandard housing with housing that is decent, safe, healthy, sanitary and affordable and of appropriate size to meet the city's current and future household needs.	**Consistent:** The Project site is currently developed with one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, vacant land, and an industrial building. Implementation of the Project would result in the demolition of existing vacant structures with a 153 multi-family residential development of which 15 percent or up to 22 units would be restricted to Low Income residents. The Project is permitted within the existing zoning regulations and has been included in the build-out projections for the City of Los Angeles.
Policy 1.4.2: Promote the development of new affordable housing units citywide and within each Community Plan area.	**Consistent:** Development of the proposed Project would include 153 multi-family dwelling units of which 15 percent or up to 22 units would be restricted to Low Income residents.
Policy 2.1.1: Establish development standards and policing practices that reduce the likelihood of crime.	**Consistent.** As discussed in Response 13(b), Public Services-Police, the proposed Project would include security cameras and lighting to enhance public safety. Additionally, the building and layout design of the proposed Project would include crime prevention features, such as nighttime security lighting and secure parking facilities. Furthermore, all crime prevention features would be approved by the LAPD prior to the issuance of a building permit.
Policy 2.2.6: To accommodate projected growth to 2014 in a sustainable way, encourage housing in centers and near transit, in accordance with the General Plan Framework Element, as reflected in Map ES.1.	**Consistent:** Development of the proposed Project would include 153 multi-family dwelling units in an urban area that is currently served by five Metro (Los Angeles County Metropolitan Transportation Authority) and two DASH routes (the City of Los Angeles DASH service). (See Policy Consistency Analysis 1.1.4 above).
Policy 2.3.2: Promote and facilitate reduction of water consumption in new and existing housing.	**Consistent:** As discussed in Response 16(d), Utilities-Water, the and Pursuant to the Los Angeles Department of Water and Power new development requirements of March 2008, the proposed Project would include a myriad of project design features to facilitate the reduction of water consumption including, but not limited to, high efficiency toilets, and high efficiency urinals to increase water conservation.
Policy 2.3.3: Promote and facilitate reduction of energy consumption in new and existing housing.	**Consistent:** The Project is proposed to improve upon Title 24 energy efficiency standards by 14 percent. Furthermore, the Project would meet the "Standard of Sustainability" rating system outlined in the Green Building Ordinance pursuant to Los Angeles Municipal Code Section 16.10 (Green Building Program) effective April 2008. The Project

Table IV-9
Project Consistency with the Applicable Policies of the City of Los Angeles
Housing Element 2006 - 2014

Policy	Consistency Discussion
	would meet the intent of the criteria for certification at the Leadership in Energy and Environmental Design (LEED®) certified level**.**
Policy 2.3.4: Promote and facilitate reduction of waste in construction and building operations.	**Consistent.** As discussed in Response 16(g), Utilities-Solid Waste, the proposed Project would comply with AB 939, which requires 50 percent of all construction and demolition waste to be reused/recycled. Additionally, AB 939 requires 50 percent of all solid waste to be diverted from landfill disposal through reduction, recycling, and composting programs. Furthermore, the proposed Project would include the placement of recycling bins in appropriate areas of the project site to promote recycling of paper, metal, glass, and other recyclable materials. Therefore, the proposed Project would be consistent with this policy.
Policy 2.4.1: Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those currently there.	**Consistent:** As discussed in Question 13, operation of the proposed project would result in less than significant impacts to public services. The Project site is currently developed with one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, vacant land, and an industrial building. The Project would introduce a stable residential community to the currently vacant and underused parcels and would continue the residential patterns in the existing residential area. Implementation of the Project would result in the demolition of existing vacant structures and redevelopment of the site with a 153 multi-family residential development of which 15 percent or up to 22 units would be restricted to Low Income residents. The Project's proposed amenities available to residents, would include, but are not limited to, a community room, recreation room, and fitness room. The Project would include adequate under-structure parking and is in an urban area which is currently served by five Metro (Los Angeles County Metropolitan Transportation Authority) and two DASH routes (the City of Los Angeles DASH service). The Project is permitted within the existing zoning regulations and has been included in the build-out projections for the City of Los Angeles and is consistent with recent development adjacent to the Project site.
Policy 2.4.3: Promote preservation of neighborhood character in balance with facilitating new development.	**Consistent.** As discussed in Response 1(c), the proposed Project would not substantially degrade the existing visual character or quality of the project site or the surrounding area. Therefore, the proposed

Table IV-9
Project Consistency with the Applicable Policies of the City of Los Angeles
Housing Element 2006 - 2014

Policy	Consistency Discussion
	Project would be consistent with this guideline.
Policy 2.4.4: Promote residential development that meets the needs of current residents as well as new residents.	**Consistent.** As discussed earlier, the Housing Element states that as the City continues to grow, there is a growing need for more housing. Additionally, the Housing Element states that not only are more housing units needed, but a broader array of housing types to meet the needs of evolving household types and sizes. Furthermore, the Housing Element stresses the need for a variety of housing price points that people at all incomes can afford. The proposed project would introduce 153 multi-family residences to the Community Plan area. Additionally, the proposed Project would set aside 15 percent of the proposed apartments for Low Income households. Therefore, the proposed Project would be consistent with this policy.
Policy 3.1.1: Promote and facilitate equal opportunity practices in the sale and rental of housing.	**Consistent.** The proposed Project would comply with all state and local laws, including the Los Angeles Municipal Code, associated with non-discriminatory rental practices.

Source: City of Los Angeles Department of City Planning, Housing Element of the City of Los Angeles General Plan, adopted August 13, 2008; and Christopher A. Joseph & Associates, May 2009.

Land Use Element

Westlake Community Plan

The Westlake Community Plan, part of the City's General Plan Land Use Element, was adopted September 16, 1997. The Community Plan sets forth specific land use requirements and required entitlements for projects within the Westlake Community Plan area (CPA) of the City, in which the Project site is located.

Land Use Designation and Density

The Community Plan designates the Project site for Commercial and Residential Multiple Family land uses, which promotes mostly commercial and retail uses along its commercial corridors and multi-family residential projects within designated zones. As previously discussed, the proposed Project would replace the existing 12 multi-family dwelling units and one single-family residential dwelling unit with a 153-unit multi-family residential development and similar to existing conditions, no commercial component.

With respect to density, the Community Plan does not include guidelines for the allowable density of a specific land use designation. However, as land use designations within the Community Plan correspond with LAMC zoning, the Community Plan refers to the LAMC and the Specific Plan for allowable

densities of a given land use designation. Therefore, the proposed Project's consistency with the allowable density for the Project site is discussed later under "Los Angeles Municipal Code."

Policies

The proposed Project's consistency with applicable objectives and policies of the Westlake Community Plan is provided in Table IV-10, Westlake Community Plan Policy Consistency Analysis. As shown therein, the proposed Project would be consistent with the applicable land use objectives and policies of the Community Plan and the associated impacts would be less than significant. Therefore, no mitigation measures are required and further analysis of this issue is not warranted.

Table IV-10
Westlake Community Plan Policy Consistency Analysis

Policy	Consistency Analysis
Residential	
Objective 1: To designate a supply of residential land adequate to provide housing of the types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population.	**Consistent.** The Project includes the replacement of 12 apartment units and one single-family unit with a 153 multi-family residential unit development on a site that is designated for multi-family residential land uses. Furthermore, the Project would provide 15 percent Low Income units.
Objective 2: To conserve and improve existing viable housing for persons desiring to live in Westlake, especially low and moderate income families.	**Consistent.** Development of the proposed Project would replace the 12 apartment units and one single-family residences with 153 multi-family residential units within a mostly urbanized area the City, for a net increase of 140 units. Fifteen percent or 15 percent units would be restricted to Low Income residents.
Policy 5: That the City shall discourage the demolition of affordable housing unless there is adequate assurance that suitable equivalent replacement units will be made available.	**Consistent.** The policy is intended to address the replacement of affordable housing units with market rate units. As previously noted, the proposed Project would result in a net increase of 140 units of which 20 units would be restricted to Low Income residents. The project increases units compared to the existing units.
Police Protection	
Policy: To consult with Police Department staff as part of the review of significant development projects and major land use plan changes to determine service demands.	**Consistent.** As part of approval of a building permit, the Project applicant would be required to submit the proposed Project plans to the Los Angeles Police Department (LAPD) for review. During this review, the LAPD would determine the need for additional law enforcement or requirements. As discussed in Response 13(b), the proposed Project would have a less than significant impact (with mitigation) on police protection.

Table IV-10
Westlake Community Plan Policy Consistency Analysis

Policy	Consistency Analysis
Fire Protection	
Policy: To consult with the Fire Department as part of the review of significant development projects and major land use plan changes to determine service demands.	As part of approval of a building permit, the Project Applicant would be required to submit the proposed site plans to the LAFD for review. During this review, the LAFD would determine the need for additional service requirements.
Circulation	
Objective 1: To maximize the effectiveness of public transportation to meet the travel needs of transit dependent residents.	**Consistent.** Development of the proposed Project would include 153 multi-family dwelling units in an urban area that is currently served by five Metro (Los Angeles County Metropolitan Transportation Authority) and two DASH routes (the City of Los Angeles DASH service). (See General Plan Policy Consistency Analysis 1.1.4 above).
Objective 2: To provide for a circulation system coordinated with land uses and densities in order to accommodate the movement of people and goods.	**Consistent.** The Project site plan proposes that the driveway on Beverly Boulevard would to be right-in and right-out only and would access one level of parking, while the driveway on the alley would be a full access driveway and would access two levels of parking. The alley provides access to both Witmer Street and 2nd Street. The Project would improve the streetscape appearance along West Beverly Boulevard and South Lucas Avenue to make it more inviting and walkable.
Objective 3: To minimize the conflict between vehicular and pedestrian traffic.	**Consistent.** The Project site plan proposes that the driveway to the understructure parking facility be located on Beverly Boulevard would to be right-in and right-out only and would access one level of parking, while the driveway on the alley would be a full access driveway and would access two levels of parking. The alley provides access to both Witmer Street and 2nd Street. Pedestrians would benefit from the streetscape improvements along West Beverly Boulevard and South Lucas Avenue noted above.
Objective 4: To encourage alternate modes of travel and provide an integrated transportation system that is coordinated with land uses and which can accommodate the total travel needs of the community.	**Consistent.** Development of the proposed Project would include 153 multi-family dwelling units in an urban area that is currently served by five Metro (Los Angeles County Metropolitan Transportation Authority) and two DASH routes (the City of Los Angeles DASH service). Furthermore, the Project would provide bicycle facilities for residents and is located within walking distance to nearby Downtown area, the commercial core of the City. (See General Plan Policy Consistency Analysis 1.1.4 above).

Note: Only those policies applicable to the proposed Project have been included in this table.

Source: City of Los Angeles, Westlake Community Plan, adopted September 16, 1997; and Christopher A. Joseph & Associates, May 2009.

City of Los Angeles Municipal Code (LAMC)

Under Section 12.16.1 of the Los Angeles Municipal Code (LAMC), the Project site is currently zoned as CW. The "CW" designation indicates the Project site is within the Central City West Specific Plan Zone.

Central City West Specific Plan

The Central City West Specific Plan (Specific Plan), effective April 3, 1991, is intended to implement the goals and policies of the Westlake Community Plan and the Silver Lake-Echo Park Community Plan and to assure the compatibility of uses. As specified in the Specific Plan, wherever the Specific Plan contains provisions which require greater setbacks, greater street dedications, lower densities, lower heights, more restrictive uses, more restrictive parking requirements, or other greater restrictions or limitations on development; or less restrictive setbacks, less restrictive uses or less restrictive parking requirements than would be allowed or required pursuant to the provisions contained in Chapter 1 of the LAMC, the Specific Plan shall prevail and supersede the applicable provisions of that Code.

Permitted Land Uses

Under the Specific Plan, the northern portion of the Project site is zoned as RC4(CW)-U/3.7, while the southern portion is zoned as R4(CW)-75/3. As set forth by the Specific Plan, the "RC4" component indicates that the northern portion of the Project site is zoned for "Residential and Commercial Mixed Use," while the "R4" component indicates that the southern portion of the Project site is zoned for "Multiple Dwelling" use.

Uses permitted in the "RC4(CW)" zone include any use permitted in the "R4" and "C2" zones as set forth in Sections 12.11 and 12.14 of the LAMC. Land uses allowed in the "R4" zone include, but are not limited to, one- and two- family dwellings, multiple dwellings, and apartment houses. Land uses permitted in the "C2" zone include, but are not limited to, single family dwellings, two-family dwellings or apartment houses. Uses permitted in the "R4(CW)" zone include any use permitted in the "R4" zone as set forth in Section 12.11 of the LAMC, as described above. The proposed project would replace existing residential and industrial buildings with a multi-family five residential story development with associated landscaping, amenities, and three levels of under-structure parking. With approval of the zoning exception to not include a commercial component, the proposed Project would be consistent with the existing zoning designations for the Project site.

Furthermore, additional zoning information for the Project site classifies the Project site as ZI-2374. This signifies the Project site is within a State of California Enterprise Zone. Within the Los Angeles Enterprise Zone, businesses can take advantage of State and/or Federal tax credits and deductions not available to businesses elsewhere. The goal of the incentives is to stimulate business attraction, growth,

and increased employment opportunities within economically disadvantaged areas of the City.[57] However, no commercial development is included as a Project component.

Height Limitations

As noted above, under the Specific Plan, the northern portion of the Project site is zoned as RC4(CW)-U/3.7, while the southern portion is zoned as R4(CW)-75/3. The "-U/3.7"[58] and "-75/3" components represent the maximum permitted height of structures within the zone (in feet) and the maximum permitted Floor Area Ratio (FAR).

The maximum allowable height of buildings on a lot in the "U" Height District is governed by the provisions of Section 8A (Urban Density Requirements – Building Height) of the Specific Plan, which states that buildings or structures located on a lot with a "U" height designation between the centerline of Bixel Street on the east and the centerline of Witmer Street/Hartford Avenue/Blaine Street on the west, such as the Project site, shall not exceed a maximum height of 1,218 feet above mean sea level (amsl).

For the northern portion of the Project site fronting West Beverly Boulevard north of the alley, the maximum height and FAR permitted is 1,218 feet amsl and 3.7:1, respectively. For the southern portion of the Project site fronting South Lucas Avenue south of the alley, the maximum permitted height and FAR is 75 feet and 3:1, respectively. Furthermore, under the Section 12.21.1 B 2 of the LAMC permits an additional 12 feet in height due to the site's existing slope of greater than 20 feet. Therefore, a maximum height of up to 87 feet is permitted; however the Project is only proposing a maximum of 78 feet in height or 437 feet above mean sea level.

The proposed multi-family development comprised of five residential stories would not exceed the height limitations of these designations and is therefore consistent with the LAMC and does not require an entitlement request.

Affordable Housing Incentives

The City adopted Ordinance No. 179,681 on February 28, 2008, which established procedures to implement California Senate Bill 1818 (SB 1818), enforced by LAMC Section 12.22 A.25 "Affordable Housing Incentives – Density Bonus." Pursuant to LAMC Section 12.22 A.25(c)(1), project applicants may request a dwelling unit density increase of between 15 and 35 percent as well as other related development incentives (e.g., reduced parking standards, etc.) in exchange for setting aside between 5 and

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[57] *Los Angeles Community Development Department, State Enterprise Zones, website: http://www.lacity.org/cdd/bus_statecred.html, July 16, 2008.*

[58] *The maximum allowable height of buildings on a lot in the "U" Height District is governed by the provisions of Section 8A (Urban Density Requirements – Building Height) of the Specific Plan, which states that buildings or structures located on a lot with a "U" height designation between the centerline of Bixel Street on the east and the centerline of Witmer Street/Hartford Avenue/Blaine Street on the west, such as the project site, shall not exceed a maximum height of 1,218 feet above mean sea level ("amsl").*

30 percent of the maximum allowable density for Very Low, Low, and/or Moderate Income housing for a period of at least 30 years. The amount of density bonus granted is based upon the type and percent of units set aside (i.e., fewer units would need to be set aside for Very Low Income housing as compared to Low Income or Moderate Income housing to warrant the same density bonus).

The proposed Project would receive one affordable incentive pursuant to LAMC Section 12.22 A.25 (c)(3) since it would include at least 15 percent of the residential units for Low Income households. The proposed Project would set aside 22 residential units for Low Income households, or 15 percent of the 144 units otherwise permitted by-right.

Permitted Density

The northern portion of the Project site is zoned as RC4(CW)-U/3.7, while the southern portion is zoned as R4(CW)-75/3. On both portions of the Project site one dwelling unit is allowed for every 400 square feet of lot area. For the purposes of calculating density, the Project's lot area plus half of the area found in the existing alleys fronting the Project site would be approximately 57,709 square feet (approximately 1.33 acres). Accordingly, the site generates a total of 144 by-right for-rent residential dwelling units,[59] of which 15 percent, or 22 dwelling units, are required to be set aside[60] for low-income housing tenants. In exchange for providing the low income units, the Project is entitled under LAMC Section 12.22 A.25(c)(3) and California Senate Bill 1818 to a 27.5 percent density bonus, or 40 dwelling units, for a total of 184 dwelling units. The proposed Project will only utilize a six percent density bonus, or nine dwelling units, to achieve its proposed density of 153 dwelling units.

Parking Requirements

The City's SB 1818 ordinance (Ordinance No. 179681) requires Housing Development Projects, such as the proposed Project, to comply with whichever of the following options requires the least amount of parking, Parking Option 1, Parking Option 2, or applicable provisions of Section 12.21 A 4 of the LAMC. Parking Option 1 of the SB1818 ordinance requires the Project Applicant to provide one on-site parking space for each studio or one-bedroom dwelling unit, two on-site parking spaces for each two- or three-bedroom dwelling unit, and 2.5 on-site parking spaces for each dwelling units of four or more bedrooms. As previously discussed, the Project would provide 79 studio, 57 one-bedroom, and 17 two-bedroom dwelling units.

Therefore, under these requirements, a total of 170 parking spaces would be required, of which eight would be tandem spaces (although 17 tandem spaces are permitted), three van-accessible spaces and three handicap accessible spaces.

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[59] *57,709 square feet (lot area pre dedication [54,900 square feet] + ½ of existing to alley to remain [2,806 square feet]) / 400 square feet of lot area per dwelling unit = 144.27 = 144 dwelling units*

[60] *The Specific Plan allows for the payment of a per unit in-lieu fee.*

Required parking for restricted affordable units under Parking Option 2 may be reduced to one parking space per restricted affordable unit with the following exceptions: 0.5 parking spaces must be provided for each dwelling unit restricted to Low and Very Low Income units for senior citizens or disabled persons and 0.25 parking spaces must be provided for each restricted affordable unit in a residential hotel. Additionally, up to 40 percent of the parking provided for the restricted affordable units may be provided by compact stalls.

Accordingly, the proposed Project's 170 parking spaces would meet the SB 1818 parking requirements of Parking Option 1 and is therefore consistent with the LAMC.

Open Space

Common open space for the Project would include front and rear yards, main, south and north terrace, recreation room, fitness room, and outdoor swimming pool. Both the Specific Plan and the LAMC have requirements specifying the total amount of open space required for any development project.

Pursuant to LAMC Section 12.21 G.2, multi-family developments with six or more residential units must provide at a minimum the following usable open space per dwelling unit: 100 square feet for each unit having less than three habitable rooms; 125 square feet for each unit having three habitable rooms; and 175 square feet for each unit having more than three habitable rooms. Usable open space shall mean an area which is designed and intended to be used for active or passive recreation, and may consist of private and/or common areas. As further defined in and regulated by LAMC Section 12.21 G.2(a)(1)(iv), in developments built at an R4 density, common open space must constitute at least 50 percent of the total open space provided. Under the LAMC, a total of 16,150 square feet of open space for the Project would be required, based on the requirements of 100 square feet of open space per dwelling unit with less than three habitable rooms, 125 square feet per dwelling unit with three habitable rooms, and 175 square feet per dwelling unit with more than three habitable rooms.[61] The LAMC does not permit the front or rear yards to count towards common open space. Also, the LAMC requires that private open space have a minimum dimension of 50 square feet and have no horizontal dimension less than six feet. Additionally, recreation rooms at least 600 square feet in area for a development of 16 or more dwelling units may qualify as open space, but may not qualify for more than 25 percent of the total required open usable open space. The Project's private open space (5,575 square feet) located within the balconies does not count towards open space because the dimensions are less than required. Also, a portion of the recreations rooms do not count towards open space because they would account for more than 25 percent of the total usual open space, and therefore only a portion of the recreation rooms count, making up only 25 percent of the total usable open space. Therefore, the Project is proposing to provide 12,092 square feet of open space per the LAMC, 4,058 square feet short of what is required.

[61] *(100 sq ft/unit*127 units)+(125 sq ft/unit*22 units)+(175 sq ft/unit*4 units)=16,150 sq ft of open space.*

However, the Specific Plan adds an additional requirement that 100 square feet of open space per unit be common area open to all residents. This requires the Project to provide a minimum of 15,300 square feet of common open space area.

Both the LAMC and Specific Plan define where open space can be located. For example, the LAMC places a limit of 25 percent on the amount of open space that can be accommodated indoors and defines certain yards where it can be located. Meanwhile, the Specific Plan has no such limitation on interior space and permits open space to be located in other yards.[62] Based on these deferent criteria, the Project is able to count 15,958 square feet, or 192 square feet less than required, of open space. While the Project's proposed technically defined open space is inconsistent with the required standards, the inconsistency is not itself a physical impact and no mitigation measures are required. With approval of the minor adjustment to reduce the amount of required Open Space by 192 square feet, the proposed Project would be consistent with the existing zoning designations for the Project site.

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

No Impact. A significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in Response 4(f) above, the Project site and the surrounding area are part of the highly urbanized Westlake Community and are not included in 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.

Cumulative Impacts

No Impact. As discussed above, the proposed Project would be compatible with surrounding residential land uses and would be consistent with local and regional plans governing the Project site. Similar to the proposed Project, development of the 134 related projects is expected to occur in accordance with adopted plans and regulations, which would, in turn, ensure compatibility with surrounding land uses. Similar to the proposed Project, the related projects would be required to procure any necessary permits or entitlements prior to commencement. Therefore, the proposed Project would not contribute to a cumulative impact related to land use or planning and no cumulative land use or planning impacts would occur.

[62] *See Appendix D of the Central City West Specific Plan and Section 12.21 G of the LAMC.*

10. MINERAL RESOURCES

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource and/or the project converted an existing or potential future regionally-important mineral extraction use to another use. Additionally, a significant impact would occur if the project affected access to a site utilized or potentially available for regionally-important mineral resource extraction.

Natural mineral deposits are nonrenewable resources that cannot be replaced once they are depleted. The primary mineral resources within the City are rock, gravel and sand deposits. According to the Conservation Element of the City of Los Angeles General Plan, significant potential deposit sites (Mineral Resources Zone 2 (MRZ-2) sites) have been identified by the state geologist along the flood plain from the San Fernando Valley through downtown Los Angeles. MRZ-2 sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 sites in the City were developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.[63]

The Project site is located within a designated Residential and Commercial Mixed Use zone (RC4) and Residential Multiple Dwelling (R4) zone under the Central City West Specific Plan and is not known to contain any significant mineral resources. The Project site is not located within a Surface Mining District ("G") zone as designated in the Los Angeles Municipal Code. In addition, the Project site is not located within a Mineral Resource Zone 2 (MRZ-2) or any other area that would indicate the presence of regionally-important mineral resources.[64]

The Project site is located within the boundaries of the Los Angeles City Oil Field, which is a City-designated Major Oil Drilling Area.[65] However, the Project site, which is currently occupied by several single- and multi-family residential structures, contains no oil wells and is not utilized for oil extraction. Development of the proposed Project would not preclude the potential for oil extraction from the site, given that access to any resources beneath the site could occur from off-site locations. Therefore, no impacts associated with the loss of availability of a known regionally-important mineral resource would occur. As such, no mitigation measures are required and no further analysis of this issue in an environmental impact report is warranted.

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[63] *City of Los Angeles General Plan, Conservation Element, Section 18: Resource Management: Mineral Resources (Sand and Gravel), September 2001, pages II-57 and 58.*

[64] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, September 1996.*

[65] *City of Los Angeles General Plan, Safety Element, Exhibit E: Oil Fields and Oil Drilling Areas in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, August 5, 2008.*

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. A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction and the project converted an existing or potential future locally-important mineral extraction use to another use or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. As discussed in Response 10(a) above, the Project site is not located within a "G" District, or a MRZ-2 Area. While the Project site is located within the boundaries of the Los Angeles City Oil Field, the proposed Project would not involve any mineral or oil extraction activities. Therefore, no impacts associated with the loss of availability of a known locally-important mineral resource would occur and no mitigation measures are required. No further analysis of this issue in an environmental impact report is warranted.

Cumulative Impacts

Development of the proposed Project in conjunction with the 134 related projects identified in Section II, Project Description, of this Initial Study would result in further infilling of uses in the already urbanized areas within the Westlake community of the City. As previously stated, the Project site is located within the boundaries of the Los Angeles City Oil Field. Some of the 134 related projects are also located in proximity to, or within the boundaries of the Los Angeles City Oil Filed. It is unknown to what extent the related projects would be or are involved in the extraction of mineral resources. However, no mineral or oil extraction activities currently take place at the Project site. Furthermore, implementation of the proposed Project would not involve mineral or oil extraction activities. Therefore, the proposed Project would not contribute to the cumulative loss of a mineral resource and no impact would occur.

11. NOISE

The following is based on the Noise Analysis, prepared by Christopher A. Joseph & Associates on March 20, 2009. A copy of this analysis and modeling data results are included in Appendix H, Noise Data, to this Initial Study.

Fundamentals of Sound and Environmental Noise

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

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources.

Superimposed on this background noise is the sound from individual local sources. 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}, the equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the Leq 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 10 dBA "penalty" added to noise during the hours of 10:00 p.m. to 7:00 a.m., and an additional 5 dBA penalty during the hours of 7:00 p.m. to 10:00 p.m. to account for noise sensitivity in the evening and nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour Leq would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 45 dBA, moderate in the 45–60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA). Generally, a difference of 3 dBA over 24 hours is a barely-perceptible increase to most people. A 5 dBA increase is readily noticeable, while a difference of 10 dBA would be perceived as a doubling of loudness.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors such as the weather and reflecting or shielding also intensify or reduce the noise level at any given location. A commonly used rule of measurement for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA. Noise from stationary or point sources is reduced by about 6 dBA for every doubling of distance. Noise levels may also be reduced by intervening

structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 dBA with closed windows. The exterior-to-interior reduction of newer homes is generally 30 dBA or more.

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact With Mitigation. A significant impact may occur where a project would not comply with the City of Los Angeles General Plan Land Use Compatibility Standards for Noise or the City of LAMC (Ordinance No. 41.40 and 112.05).

Implementation of the proposed Project could result in the introduction of noise levels that may exceed permitted City noise levels. The primary sources of noise associated with the proposed Project would be construction activities at the Project site. However, Project-related traffic volumes and secondary sources of noise, including new stationary sources (such as heating, ventilation, and air conditioning units) and increased human activity throughout the Project site associated with operation of the proposed development would also occur. The net increase in Project site noise levels generated by these activities and other sources have been quantitatively estimated and compared to the applicable noise standards and thresholds of significance. Noise impacts associated with the operation of the Project are discussed under Question 11(c) below.

Aside from noise levels, groundborne vibration would also be generated during the construction phase of the proposed project by various construction-related activities and equipment. Thus, the groundborne vibration levels generated by these sources have also been quantitatively estimated and compared to applicable thresholds of significance. Groundborne vibration is discussed under Question 11(b) below.

Construction Noise Levels Thresholds

Construction noise levels were estimated by data published by the United States Environmental Protection Agency (U.S. EPA). Potential noise levels are identified for off-site locations that are sensitive to noise, including existing residences.

The State CEQA Guidelines do not define the levels at which permanent and temporary increases in ambient noise are considered "substantial." Therefore, for the purposes of this analysis, noise impacts are subject to the City of Los Angeles CEQA Thresholds Guide,[66] which states that a project would normally have a significant impact on noise levels from construction if:

[66] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, pages I.2-3 and I.2-4.*

(a) Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA[67] or more at a noise sensitive use;

(b) Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or

(c) Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.

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

Section 112.05 of the LAMC specifies the maximum noise level for powered equipment or powered hand tools. Any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from construction and industrial machinery is prohibited. However, the above noise limitation does not apply where compliance is technically infeasible (Section 112.05 of the LAMC). 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 techniques during the operation of the equipment. Thus, in accordance with Section 112.05 of the LAMC, a project would normally have a significant impact on noise levels from construction if:

(a) Noise levels associated with construction equipment would exceed 75 dBA at a distance of 50 feet from construction and industrial machinery.[68]

Existing Conditions

As discussed in Section II, Project Description, of this Initial Study, the Project site is currently developed with one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, vacant land, and an industrial building. The proposed Project would involve the demolition of all existing residential and industrial uses on the Project site. The area surrounding the Project site is characterized by a dense combination of educational, commercial and residential land uses. One- and two- story commercial buildings, interspersed with surface parking lots are located directly north and across West Beverly Boulevard from the Project site (nearest structures are

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[67] *The decibel (dB) is the standard unit for measuring the relative loudness of sound. The A-weighted decibel scale (dBA) relates to the pitch frequency of the sound, providing a special frequency-dependent rating scale to relate noise to human hearing and sensitivity.*

[68] *Threshold does not apply where compliance is deemed technically infeasible, as defined under Section 112.05 of the LAMC.*

approximately 130 feet from the Project site). A five-story residential development is directly east of the Project site across South Lucas Avenue (nearest portion of the complex is approximately 80 feet from the Project site). Single- and multi-family residential buildings are located adjacent and to the south of the Project site (some residential structures are approximately 25 feet from the Project site). A newly developed six-story apartment building is located south and west of the Project site along South Witmer Street (approximately 50 feet from the Project site). An existing two-story residential building is located adjacent and to the west of the Project site (approximately 50 feet from the Project site). Additionally, Belmont High School is located to the west of the Project site across South Witmer Street (the sports courts are approximately 125 feet from the Project site).

Construction Noise

During Project construction, three basic types of activities would be expected to occur and generate noise. The first activity would involve the demolition of all existing on-site structures and the removal of associated landscaping and parking. Once demolished, the debris from the buildings would be hauled away. Second, the development site would be prepared, excavated, and graded to accommodate the parking structure and building foundations. Third, a multi-family five residential story building comprised of 153 for-rent dwelling units with associated landscaping, amenities, and three levels of under-structure parking would be constructed. Overall, construction is anticipated to begin in November of 2009 and end in March of 2011. The Project would offer a variety of amenities for residents, including a lobby, fitness room, recreation room, swimming pool and open space. There is no commercial component associated with the proposed Project.

Construction of the proposed Project would require the use of heavy equipment for site clearing and grading, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, 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 the activity. In general, building construction activities at the Project site, which would involve the use of loaders, excavators and other medium sized equipment such as generators, would generate the loudest noise levels during construction of the proposed Project.

According to the U.S. EPA, excavation activities during construction for the proposed Project could generate a maximum noise level of 84 dBA CNEL[69] (without mufflers) at 50 feet. As with all construction equipment, noise levels would diminish rapidly with distance from the construction activity at a rate of approximately six dBA per doubling of distance. Construction activities would primarily affect the existing nearby off-site residential uses: the two-story multi-family residential building located

[69] *The Community Noise Equivalent Level (CNEL) is a noise measurement scale applied over a 24-hour period to all noise events received at the measurement point. It is weighted more heavily for evening and night periods in order to account for the lower tolerance of individuals to noise during those periods.*

approximately 50 feet to the west of the Project site, the six-story apartment building located approximately 50 feet south and west of the Project site, and the multi-family residential building located approximately 25 feet to the south of the Project site.

Based on the U.S. EPA's outdoor construction noise levels, and considering distance from noise, temporary construction noise levels could periodically reach 81.0 dBA CNEL (with mufflers) for the residential uses to the west of the Project site and 87.0 dBA CNEL (with mufflers) for the two-story multi-family residential building to the south of the Project site. In addition, existing roadway noise levels at the existing residential uses to the west would average approximately 64.1 dBA CNEL and approximately 59.4 dBA CNEL at the existing multi-family uses to the south, resulting in a 16.9 dBA CNEL and 27.6 dBA CNEL increase respectively. Therefore, construction activities would increase noise levels at these residential uses by more than 5 dBA CNEL for 10 days in a three month period as the proposed Project would be expected to take several months to complete.

However, construction activities associated with the proposed Project would only occur during the permitted hours designated in Section 41.40 of the LAMC and impacts would be considered less than significant for the residential uses as construction would not occur during recognized sleep hours. Because construction would be allowed to occur during school hours when children require quiet environments during class time (Belmont High School classrooms are located several hundred feet south and west of the Project site), impacts may be potentially significant. Compliance with the City of Los Angeles Noise Ordinance No. 112.05, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible, and City of Los Angeles Noise Ordinance No. 41.40, which restricts construction and demolition activities to the hours of 7:00 a.m. to 9:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday, and implementation of Mitigation Measures 11-1 through 11-8 would serve to reduce the construction-related noise levels associated with development of the Project site to a less than significant level.

Mitigation Measures

The following mitigation measures are recommended to further reduce construction-related noise levels:

11-1 Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

11-2 The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, jackhammers, and pile drivers.

11-3 Noise 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-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.

11-4 Equipment warm-up areas, water tanks, and equipment storage areas shall be located as far as possible from the surrounding residential uses.

11-5 The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

11-6 Flexible sound control curtains shall be placed around drilling apparatuses and drill rigs used within the Project site, if sensitive receptors are located at or within 50 feet.

11-7 All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.

11-8 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

Less Than Significant Impact With Mitigation. A significant impact may occur if the proposed Project would create generally excessive groundborne vibration levels during operation or outside of construction hours permitted by Section 41.40 of the LAMC.

Groundborne vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and in the U.S. is referenced as vibration decibels (VdB). The background vibration velocity level in residential and educational 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 approximately dividing line between barely perceptible and distinctly perceptible levels for many 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, and 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Operation of the Project's proposed residential uses would not create perceptible groundborne vibration. Accordingly, groundborne vibration impacts associated with the proposed Project's construction phase are analyzed below.

Construction Vibration Thresholds

The State CEQA Guidelines do not define the levels at which groundborne vibration or groundborne noises are considered "excessive." This analysis uses the Federal Railway Administration's (FRA) vibration impact thresholds for sensitive buildings, residences, and institutional land uses under conditions where there are an infrequent number of events per day. Thus, in accordance with the vibration impact thresholds of the FRA, a significant vibration impact may occur under the following conditions:[70]

(a) Groundborne vibration levels at or exceeding 65 VdB at buildings where vibration would interfere with interior operations (e.g., vibration-sensitive research and manufacturing, hospitals with vibration-sensitive equipment, and university research operations);

(b) Groundborne vibration levels at or exceeding 80 VdB at residences where people normally sleep (e.g., hotels and hospitals); and

(c) Groundborne vibration levels at or exceeding 83 VdB at institutional land uses (e.g., schools and churches).

Construction-Related Groundborne Vibration

Groundborne vibration during construction is generally associated with major earthmoving and foundation activities. Development of the Project would require the use of typical construction equipment that would generate outdoor sources of perceptible groundborne vibration and noise. Excavation, grading, demolition, and building construction activities could include the use of large bulldozers, caisson drilling rigs, loaded trucks, jackhammers, and small bulldozers, which could generate vibration levels ranging from 52 VdB to 81 VdB at 50 feet and from 58VdB to 87 VdB at 25 feet. These projected vibration levels could be experienced when equipment is operating at the Project's property line immediately adjacent to the existing nearby off-site sensitive receptors (residential uses). Accordingly, the two-story multi-family residential building located approximately 50 feet to the west of the Project site and the six-story apartment building located approximately 50 feet south and west of the Project site, could be exposed to groundborne vibration levels as high as 81.0 VdB; and the multi-family residential building located approximately 25 feet to the south of the Project site, could be exposed to groundborne vibration levels as high as 87.0 VdB. Similar to noise, vibration levels attenuate at a rate of approximately six VdB per doubling of distance. Overall, the residential uses to the west and south of the Project site would be exposed to vibration levels that would exceed the FRA's threshold of 80 VdB for

[70] *Federal Railroad Administration, 1998.*

residential uses where people normally sleep. As such, the vibration impacts would be potentially significant.

Implementation of Mitigation Measures 11-9 and 11-10 would serve to reduce the vibration levels associated with development of the Project site to a less than significant level.

Mitigation Measures

11-9 Existing structure demolition and site excavation located within 75 feet of the multi-family uses shall only occur between 9 a.m. and 5 p.m. Monday through Friday.

11-10 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.

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles CEQA Thresholds Guide, the proposed Project would typically have a significant impact on noise levels from Project operations if the proposed Project would increase the ambient noise levels by 3 dBA CNEL at the property line of homes where the resulting noise level would be at least 70 dBA CNEL or at the property line of commercial buildings where the resulting noise level is at least 75 dBA CNEL.

Operational Residential Noise

As noted above, upon completion and operation of the proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment. However, the operation of this and any other on-site stationary sources of noise would be required to comply with the Section 112.02 of the Los Angeles Municipal Code, 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. On this basis, a significant permanent noise impact from on-site residential operations is not anticipated and as such, no mitigation measures are required. Additionally, noise would be generated from the on-site parking facility. These impacts are discussed in greater detail under Question 11(d) below.

Operational Vehicular Noise

Locations in the vicinity of the Project site would experience permanent changes in noise levels if the proposed Project increases the number of motor vehicles traveling to and from the Project site. In order

for a 3 dBA increase in noise levels to occur, the sound energy must double. In the case of roadway noise levels, the traffic volume must double and the vehicle speed must not decrease.

Existing roadway noise levels were calculated for the roadway links in the Project vicinity that have noise-sensitive uses facing the roadways. This task was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Project Traffic Study, included as Appendix I, Traffic Data, of this Initial Study. The noise model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are presented in Table IV-11, Existing Roadway Noise Levels Offsite.

Table IV-11
Existing Roadway Noise Levels Offsite

Roadway	Roadway Segment	Existing Sensitive Land Uses Located Along Roadway Segment	dBA CNEL (1)
Glendale Boulevard	North of 2nd Street	Residential	65.3
Lucas Avenue	South of 2nd Street	Residential	59.4
	North of 3rd Street	Residential	59.8
	South of 3rd Street	School	59.7
Beverly Boulevard	West of Loma Drive/Belmont Avenue	Residential	62.4
	East of Loma Drive/Belmont Avenue	Residential	62.3
	West of Glendale Boulevard	Residential	57.7
2nd Street	East of Glendale Boulevard	Residential	64.3
	West of Beaudry Avenue	Commercial	64.1
	East of Beaudry Avenue	Commercial	64.1
Beaudry Avenue	North of 2nd Street	Commercial	61.9
	South of 2nd Street	Commercial	62.7
	North of I-110 Southbound Off-ramp	Commercial	62.7
	South of I-110 Southbound Off-ramp	Commercial	63.0
Belmont Avenue	North of Beverly Drive	Residential	53.9
Loma Drive	South of Beverly Drive	Commercial	46.7
Witmer Street	North of 3rd Street	Residential	51.0
	South of 3rd Street	Residential	53.5
3rd Street	West of Witmer Street	Commercial	64.1
	East of Witmer Street	Commercial	64.1
	West of Lucas Avenue	School	65.2
	East of Lucas Avenue	School	65.5

Table IV-11
Existing Roadway Noise Levels Offsite

Roadway	Roadway Segment	Existing Sensitive Land Uses Located Along Roadway Segment	dBA CNEL (1)

Notes:

(1) Values represent noise levels at the property building of the off-site sensitive land uses. It should be noted that the resulting noise levels are conservative, as many of the off-site residential uses have noise walls to attenuate roadway traffic noise. Because an extensive surrounding land use survey was not performed, this analysis was unable to determine which off-site residential uses had noise walls. As such, the noise attenuation from noise walls was excluded from this analysis.

Source: Christopher A Joseph and Associates, 2009. Calculation data and results are provided in Appendix H, Noise Data, of this Initial Study.

Long-term noise impacts from the development of the proposed Project have the potential to affect off-site locations, resulting primarily from vehicular traffic utilizing the local roadways along the affected roadway segments identified and analyzed in the Traffic Study, which is included as Appendix I, Traffic Data, to this Initial Study. Based on the Traffic Study, in combination with an analysis of the surrounding land uses, roadway noise levels were forecast to determine if the proposed Project's vehicular traffic would result in a significant impact at off-site, noise-sensitive receptor locations. Traffic noise impacts along the selected roadway segments were determined by comparing future (2011) conditions without the proposed Project to future conditions with the proposed Project, realizing any increases, and then comparing to the City's significance threshold (3.0 dBA CNEL). The increases in noise levels at noise-sensitive locations along the study-area roadway segments are identified in Table IV-11, Project Traffic Noise Impacts Offsite. Table IV-12, Future (2011) Traffic Noise Impacts, lists the existing noise-sensitive uses located along the roadway segments in the Project vicinity, and compares the existing roadway noise levels at these segments to the increase in noise levels that would result from the additional traffic generated by the proposed Project.

Table IV-12
Future (2011) Traffic Noise Impacts

Roadway	Roadway Segment	Noise Levels in dBA CNEL			
		Future (2011) WITHOUT Project	Future (2011) WITH Project	Increase	Significance Threshold
Glendale Boulevard	North of 2nd Street	66.5	66.5	0	3.0
Lucas Avenue	South of 2nd Street	61.3	61.3	0	3.0
	North of 3rd Street	61.6	61.7	0.1	3.0
	South of 3rd Street	61.6	61.6	0	3.0
Beverly Boulevard	West of Loma Drive/Belmont Avenue	63.7	63.7	0	3.0
	East of Loma Drive/Belmont Avenue	63.6	63.6	0	3.0
	West of Glendale Boulevard	58.3	58.4	0.1	3.0
2nd Street	East of Glendale Boulevard	64.7	64.8	0.1	3.0
	West of Beaudry Avenue	64.8	64.8	0	3.0
	East of Beaudry Avenue	64.6	64.6	0	3.0

Table IV-12
Future (2011) Traffic Noise Impacts

Roadway	Roadway Segment	Noise Levels in dBA CNEL			
		Future (2011) WITHOUT Project	Future (2011) WITH Project	Increase	Significance Threshold
Beaudry Avenue	North of 2nd Street	62.8	62.8	0	3.0
	South of 2nd Street	63.6	63.7	0.1	3.0
	North of I-110 Southbound Off-ramp	63.6	63.6	0	3.0
	South of I-110 Southbound Off-ramp	63.8	63.8	0	3.0
Belmont Avenue	North of Beverly Drive	54.0	54.0	0	3.0
Loma Drive	South of Beverly Drive	46.7	46.7	0	3.0
Witmer Street	North of 3rd Street	51.1	51.3	0	3.0
	South of 3rd Street	55.1	55.2	0.1	3.0
3rd Street	West of Witmer Street	65.7	65.7	0	3.0
	East of Witmer Street	65.7	65.7	0	3.0
	West of Lucas Avenue	66.5	66.5	0	3.0
	East of Lucas Avenue	66.7	66.7	0	3.0

Source: Christopher A Joseph and Associates, 2009. Calculation data and results are provided in Appendix I, Traffic Data, to this Initial Study.

It was determined that some off-site locations in the Project vicinity would experience a slight increase in permanent noise resulting from the additional traffic generated by the proposed Project. The proposed Project would increase local noise levels by a maximum of 0.1 dBA CNEL for the several roadway segments, and several of the analyzed roadway segments would not experience an increase in roadway noise as a result of the proposed Project. Because the increase in local noise levels at all of the analyzed roadway segments resulting from implementation of the proposed Project would not exceed the 3.0 dBA CNEL threshold established under the City's CEQA Thresholds Guide, they would not represent a substantial permanent increase in ambient noise levels. Therefore, noise impacts associated with additional traffic generation by the proposed Project would be less than significant and no mitigation measures are warranted.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. A significant impact may occur if the proposed Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the proposed Project.

The California Government Code Section 65302(g) requires that a noise element be included in the General Plan of each county and city in the State. The Noise Element of the City of Los Angeles General Plan is intended to identify sources of noise and provide objectives and policies that ensure that noise from various sources does not create an unacceptable noise environment. Overall, the City's Noise Element describes the noise environment (including noise sources) in the City, addresses noise mitigation

regulations, strategies, and programs as well as delineating federal, State, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise. It is a tool that City planners use to achieve and maintain compatible land uses with environmental noise levels.

The City's noise standards are correlated with land use types in order to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within a specified land use. In accordance with the Noise Element of the City of Los Angeles General Plan, a noise exposure of up to 60 dBA CNEL exposure is considered to be the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors, such as single-family homes. In addition a noise exposure of up to 65 dBA CNEL exposure is considered to be the most desirable target for the exterior of multi-family homes. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dBA CNEL for noise-sensitive uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dBA CNEL are normally unacceptable for sensitive receptors except in unusual circumstances.

HVAC Systems

As noted above, upon buildout of the proposed Project, new sources of noise would include stationary sources such as rooftop heating, ventilation, and air conditioning systems (HVAC) installed for the new residential uses located within the Project site. Large HVAC systems associated with the proposed residential uses could result in noise levels that average between 50 and 65 dBA L_{eq}[71] at 50 feet from the source. As 24-hour CNEL noise levels are about 6.7 dBA greater than 24-hour L_{eq} measurements, the HVAC equipment associated with the proposed residential uses could generate noise levels that average between 57 to 72 dBA CNEL at 50 feet when the equipment is operating continuously over a 24-hour period. These units are generally roof mounted and would be placed greater than 50 feet away from any sensitive receptor. As discussed previously, noise attenuates at approximately 6 dBA per doubling of distance. Therefore noise generated by the use of HVAC units associated with the proposed Project would produce maximum noise levels of approximately 59 dBA at the nearest residences to the south. As such, the noise levels generated by these large HVAC units would not exceed the City's exterior noise level standard of 65 dBA CNEL for off-site residential uses. Thus, the residential uses off-site would not be exposed to noise levels that exceed the City's noise standards. In addition, Project development, while contributing to an overall increase in ambient noise levels in the Project area, would result in land uses that are consistent with the General Plan land use designation for the Project site and would generate noise levels which are similar to surrounding land uses.

Parking Facilities

Noise would also be generated by activities within the proposed three-level structured parking facilities within the Project site. It is anticipated that sources of noise from the multiple surface and structured

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[71] *L_{eq} is the average acoustic energy content of noise for a stated period of time.*

parking facilities located throughout the Project site would include tires squealing, engines accelerating, doors slamming, and car alarms. Noise levels at the parking facilities would fluctuate with the amount of automobile and human activity at the Project site. During times when the largest number of people would enter and exit the Project site (usually morning and evening), the noise levels would range from 60 to 70 dBA L_{eq}. There would also be times in the day when very little activity occurs and the noise levels would average 50 to 60 dBA L_{eq}. The exterior-to-interior reduction of newer residential units in California is generally 30 dBA or more. Thus, impacts associated with noise generated as a result of the operation of the proposed Project would not adversely affect the surrounding residential uses, and this impact 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?

No Impact. Based upon the criteria established in the City of Los Angeles CEQA Thresholds Guide, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the proposed Project increases ambient noise levels by 1.5 dBA CNEL or greater. As discussed in Response 7(e), the Project site is not located within two miles of an airport or within an airport land use plan area. Therefore, no impact would occur.

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

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

Cumulative Impacts

Less Than Significant Impact. The continued development throughout the City would result in intermittent, short-term noise impacts throughout the area. Construction activities could result in significant short-term noise impacts on sensitive land uses in the vicinity of the Project site. The duration of these localized impacts would be limited to the construction phases of the individual projects. All construction activities taking place within the City would be subject to the City of Los Angeles's requirements and regulations.

Cumulative Construction Noise and Vibration

Development of the proposed Project in conjunction with nearby related projects could result in an increase in construction-related noise and vibration in this already urbanized area of the City. With Noise Element compliance, the combined impact of the construction noise and vibration from the proposed Project and existing noise levels of interior and exterior noise levels on adjacent properties would be

significant but of short duration. Based on the information in Responses 11(a) and 11(b) above, the noise and vibration levels associated with the proposed Project's construction activities would temporarily and intermittently exceed City standards and increase ambient noise levels at adjacent locations. Therefore, the proposed Project has the potential to cause a cumulatively considerable contribution to construction-related noise impacts. However, the nearest related projects to the proposed Project site (Coronita Family Apartments located to the south, and Northwest Gateway multi-family apartments located to the east) are already in the final phases of construction and would also be subject to Section 112.05 of the LAMC, which reduces construction noise impacts to the maximum extent feasible by prohibiting loud, unnecessary, and unusual construction noise within 500 feet from any residential zone, and LAMC Section 41.40, which limits the hours of allowable construction activities. Conformance with these City policies would reduce construction-related noise and vibration for the related projects. As such, cumulative noise and vibration impacts associated with construction activities would be less than significant and no mitigation measures are warranted.

Cumulative Operational Noise

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the Project vicinity. The predicted future year (2011) ambient noise levels (presented in the Noise Analysis) with and without the proposed Project are based on cumulative traffic conditions, which already take into account expected development of related projects identified in the surrounding area. As summarized above in Response 11(c), none of the study roadway segments in the Project vicinity would experience a substantial increase in ambient noise levels resulting from future ambient growth with the proposed Project (as compared to cumulative conditions without the proposed Project). As such, the cumulative noise impact associated with operational traffic would be less than significant.

With respect to stationary sources, all related projects would be required to comply with the regulations under the City's Noise Ordinance 112.02 of the LAMC, 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 5 dB. In addition, all related projects would require exterior walls to be constructed to provide a Sound Transmission Class of 50 or greater as defined in California Building Code No. 35-1, 1979 edition or any amendment thereto, or to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room. Consequently, all on-site equipment would be designed such that they would be shielded and appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby noise-sensitive uses. Thus, through conformance with LAMC Section 112.02 and UBC No. 35-1, 1979 edition, the cumulative noise impact associated with stationary sources would be less than significant and no mitigation measures are warranted.

12. POPULATION AND HOUSING

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact may occur if a project were to locate new development such as homes, businesses or infrastructure, with the effect of substantially inducing growth that would otherwise not have occurred as rapidly or in as great a magnitude.

As part of its comprehensive planning process for the Southern California region, the Southern California Association of Governments (SCAG) has divided its jurisdiction into 14 subregions. The Project site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. SCAG provides recent population and housing data for the Los Angeles, including growth projections up to the year 2035. According to SCAG data compiled in 2008, the City of Los Angeles is projected to have an estimated population of 4,057,484 persons and approximately 1,433,105 housing units by 2010. SCAG further projects that the City of Los Angeles will have a 2015 population of approximately 4,128,125 persons (a 1.7 percent increase) and an estimated 1,493,244 housing units (a 4.0 percent increase) in 2015.[72]

The first activity would involve the demolition of the existing on-site structures, which consist of one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, and an industrial building totaling approximately 11,279 square feet (193,800 square feet).

The proposed project would replace the existing on-site structures, which consist of one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, and an industrial building totaling approximately 11,279 square feet (193,800 square feet) with 153 multi-family residential development that would introduce an expanded residential population to the Westlake Community Plan area (CPA). Population and housing impacts, typically, are most significantly experienced at the local level, in this case, within the Westlake CPA. As such, analyzing population and housing characteristics by CPA offers a more precise method for assessing potential project-related impacts to existing and forecasted populations. Statistics for the Westlake CPA are maintained by the City of Los Angeles Department of City Planning, Demographic Research Unit (the "Demographic Unit"). The Demographic Unit contains statistics for the Westlake CPA to 2007 and estimates to 2010. Construction of the proposed Project would commence in 2009 with Project buildout anticipated for 2011. As such growth rates from 2007 to 2010, for population and housing, are applied to the projected statistics for 2010 to arrive at the estimated population and housing numbers for 2011.

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[72] *Southern California Association of Governments, SCAG 2004 Growth Forecasts, City of Los Angeles Subregion http://www.scag.ca.gov/forecast/downloads/2008GF.xls, March 2009.*

The Westlake CPA contained an estimated 120,446 persons in 2008[73] and is projected to contain an estimated 121,987 persons by 2010.[74] This would represent an average growth rate of approximately one percent per year between 2008 and 2010. Applying this rate to the projected 2010 population of 121,987, the Westlake CPA would be anticipated to contain approximately 123,207 persons by 2011.

With respect to housing, the Westlake CPA contained an estimated 38,373 housing units in 2008[75] and is projected to contain an estimated 38,860 housing units by 2010.[76] This would represent an average growth rate of approximately one percent per year between 2008 and 2010. Applying this rate to the projected 38,860 housing units by 2010, the Westlake CPA would be anticipated to contain approximately 39,249 housing units by 2011.

The proposed Project's impacts with respect to population and housing are discussed below.

Employees

There are no commercial land uses on the Project site. Implementation of the proposed project would remove all of the existing residential and industrial land uses on the project site. The existing industrial uses on the project site encompass approximately 11,279 square feet. As such, there are approximately 41 employees (11,279 square feet x 0.0034965)[77] that would be removed as a result of Project implementation. The proposed multi-family residences would generate, at most, a marginal number of employees for administrative and maintenance needs. Therefore, the proposed Project would maintain fewer employees in the CPA than the current land uses on the Project site.

Residents

Based on the estimates provided above, the average household size for dwelling units in 2011 would be 3.14 persons per unit (123,207/39,249). Using this rate, the proposed Project would result in approximately 481 residents (153 units x 3.14 persons/unit), or a net increase of approximately 438 residents to the Westlake CPA.[78] This would represent less than one percent (0.1 percent) of the projected

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[73] *City of Los Angeles Department of City of Planning Demographic Research Unit, Population and Housing Profile Westlake Community Plan Area, Community Profile, Website: http://cityplanning.lacity.org/, updated May 2009.*

[74] *City of Los Angeles Department of City Planning, Wilshire Community Plan, adopted September 16, 1997.*

[75] *City of Los Angeles Department of City of Planning Demographic Research Unit, Population and Housing Profile Westlake Community Plan Area, Community Profile, Website: http://cityplanning.lacity.org/, updated May 2009.*

[76] *City of Los Angeles Department of City of Planning Demographic Research Unit, Population and Housing Profile Westlake Community Plan Area, Community Profile, Website: http://cityplanning.lacity.org/, May 2009.*

[77] *Based on employee generation rate provided by the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002.*

[78] *153 units (proposed)*3.14 persons/unit=481 persons–43 persons (12 existing multi-family units @ 3.17 persons/unit+ 1 existing single-family unit @ 4.64 persons/unit)=438 net persons*

CPA population for 2011. This would not be considered a substantial increase since the addition of 438 persons is within the anticipated projections for population increases in the Westlake CPA.

No permanent residents would be generated as a result of construction of the proposed Project, as the Project would only generate temporary construction-related jobs. Specifically, most construction jobs for development of this size and nature are completed in a timely manner and require specialized workers depending on the construction phase. As such, construction workers are not likely to relocate to the area as a result of working on the proposed project.

Population growth associated with the proposed Project has already been anticipated and planned for in projections provided by SCAG, the City, and the Community Plan. Therefore, impacts would be less than significant.

Housing

With respect to housing, as discussed above, the Westlake CPA is projected to contain 39,249 housing units by 2011. The proposed Project would provide 153 multi-family residential dwelling units and would introduce 140 net dwelling units to the CPA.[79] The net increase of 140 dwelling units would represent less than one percent (0.4 percent) of the housing stock projected for the CPA. This is not considered to be a substantial increase in the housing stock for the City because the addition of 140 new dwelling units is within the projected housing increases for the City based on SCAG, the City, and the Community Plan; thus, impacts would be less than significant.

As such, the housing growth associated with the proposed Project has already been anticipated and planned for in projections provided by SCAG. Therefore, impacts would be less than significant.

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

No Impact. A significant impact may occur if a project would result in displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere. The proposed project displaces 12 existing apartment units and one single-family unit, which is not a substantial number. Furthermore, implementation of the proposed Project would increase the numbers of existing housing within the Westlake CPA, which would not necessitate the construction of replacement housing. Specifically, the proposed Project consists of a new 153-unit multi-family residential building, which would replace an existing 12-unit apartment building and one single family home. The only time in which existing housing would not be provided at the Project site is during construction related activities, which are short term in nature. As such, the proposed Project would introduce a net increase of 140 multi-family residential units to the CPA and no impacts related to displacement of existing housing would occur.

[79] *153 units (proposed) –13 units (existing)=140 net residential units*

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

No Impact. A significant adverse effect may occur if a project would result in displacement of substantial numbers of people in existing occupied housing. As stated above, the proposed Project consists of a new 153-unit multi-family residential building, which would replace an existing 12-unit apartment complex and one single-family unit located on the Project site. In 2008, the average household size in the Westlake CPA was 3.17 persons per multi-family unit and 4.64 per single-family unit.[80] Applying these figures to the existing 12-unit apartment complex and the one single-family unit, the existing units are estimated to house approximately 43 residents.

Since the proposed Project consists of 133 new market-rate and 22 Low Income residential units similar to the existing for-rent apartment units, it is likely, that a majority of the existing apartment residents could reside in the new building. Nonetheless, consistent with the City's Rent Stabilization Ordinance and Chapter XV of the LAMC, the Project Applicant would provide necessary relocation assistance to both qualified and non-qualified tenants of the apartment complex. This includes, among other things, the filing of a Termination of Tenancy application with the City's Housing Department and the provision of information to existing tenants as needed to facilitate their relocation. Furthermore, the proposed project would not result in a direct or indirect need to construct new housing elsewhere in the City, as the proposed project would provide a net increase in the City's housing stock of multi-family residential units. Furthermore, tenant relocation is being provided as mandated by law, for those tenants being displaced by the proposed Project, as mentioned above. Thus, no impact would occur, as the project would not displace a substantial number of people.

Cumulative Impacts

Less Than Significant Impact. Implementation of the proposed Project in combination with the 134 related projects would result in an increase in population and housing in the Westlake CPA, when considering the amount of newly proposed residential units and commercial uses of the related projects. Of the 134 related projects, only 37 related projects are located within the Westlake CPA, similar to the proposed project. The population and housing increases associated with the remaining 97 related projects would be addressed by the Silver Lake-Echo Park Elysian Valley, Central City, Central City North, Southeast Los Angeles, and South Los Angeles Community Plans due to varying statistical data and growth projections when compared to development within the Westlake CPA.

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[80] *City of Los Angeles Department of City Planning, City of Los Angeles Population & Housing Estimates (2006), Summary Data by Community Plan Area: Westlake Community Plan, website: http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=Wlk&sgo=ct&rpt=PnH&yrx=08, May 20, 2009.*

As shown in Table IV-13, Cumulative Population and Housing Growth, the proposed Project combined with the 37 related projects within the Westlake CPA would result in a cumulative increase of 32,165 new persons (including both residents and employees) and 8,323 new housing units in the Westlake CPA

Population

The approximately 32,165 cumulative new persons (residents and employees) represents substantially more than the 1,220-person population growth anticipated by SCAG for the Westlake CPA between 2010 and 2011.

Of these 32,165 individuals, only a net increase of 438 residents would be attributed to the proposed Project. These 438 residents represent approximately 1.4 percent of the cumulative population growth generated by the related projects. As 1.4 percent is not considered to be a substantial contribution to cumulative population growth, the proposed Project's contribution to cumulative population impacts would be less than significant.

Table IV-13
Cumulative Population and Housing Growth

Related Project No.	Project Description Land Use	Size Dwelling Unit (du) Square Feet (sf)	Generation Rates		Total Population (persons)	Total Housing (du)
			Population[(a)] (resident/du)	Employment[(b)] (employee/ 1,000 sf)		
3	Apartments	87 du	3.17	--	276	87
	Commercial	70,231 sf	--	2.2371	158	--
4	Office	5,432 sf	--	3.4965	19	--
	Uniform Sales Store	7,168 sf	--	2.2371	17	--
5	Grocery	40,000 sf	--	2.2371	90	--
	Retail	30,000 sf	--	2.2371	68	--
	Community Facility[(c)]	40,000 sf	--	3.4965	140	--
7	Apartments	21 du	3.17	--	67	21
8	Condominiums	460 du	3.17	--	1,459	460
9	Apartments	102 du	3.17	--	324	102
	Retail	4,212 sf	--	2.2371	10	--
11	Apartments	600 du	3.17	--	1,902	600
	Retail	20,000 sf	--	2.2371	45	--
12	Affordable Apartments	75 du	3.17	--	238	75
14	Apartments	261 du	3.17	--	828	261
	Specialty Retail	6,398 sf	--	2.2371	15	--
16	Condominiums	54 du	3.17	--	172	54
17	Office	880,000 sf	--	3.4965	3,077	--
18	Auto Sales & Parking Lot	25,880 sf	--	2.2371	58	--
20	Imageing Center, Pharmacy, Surgical Suites & Physician Offices	150,000 sf	--	3.4965	525	--
22	Performing Arts High School	64 rooms	--	n/a	n/a	--

Table IV-13
Cumulative Population and Housing Growth

Related Project No.	Project Description Land Use	Size Dwelling Unit (du) Square Feet (sf)	Generation Rates		Total Population (persons)	Total Housing (du)
			Population[(a)] (resident/du)	Employment[(b)] (employee/ 1,000 sf)		
	Performing Arts Theater	1,600 seats	--	n/a	n/a	--
25	Apartments	725 du	3.17	--	2,299	725
	Retail	39,999 sf	--	2.2371	90	--
28	Hotel	80 beds	--	n/a	n/a	--
	Condo Hotel	112 beds	--	n/a	n/a	--
	Condominiums	165 du	3.17	--	524	165
	Retail	7,500 sf	--	2.2371	17	--
	Restaurant	13,000 sf	--	2.2371	30	--
33	Office	25,500 sf	--	3.4965	90	--
	Exam Facility	50 visitors	--	n/a	n/a	--
	Conference Facility	350 visitors	--	n/a	n/a	--
34	High-Rise Condominiums	132 du	3.17	--	419	132
	Condominiums	73 du	3.17	--	232	73
	Apartments	46 du	3.17	--	146	46
	Retail	19,103 sf	--	2.2371	43	--
40	Apartments	444 du	3.17	--	1,408	444
	Retail	30,650 sf	--	2.2371	69	--
41	Condominiums	130 du	3.17	--	413	130
	Apartments	250 du	3.17	--	793	250
	Supermarket	30,000 sf	--	2.2371	68	--
	High Turnover Restaurant	150,000 sf	--	2.2371	336	--
	Retail	200,000 sf	--	2.2371	448	--
52	Live/Work Condominiums	190 du	3.17	--	603	190
	Retail	5,540 sf	--	2.2371	13	--
61	Condominiums	118 du	3.17	--	375	118
	Retail	3,000 sf	--	2.2371	7	--
63	Condominiums	464 du	3.17	--	1,471	464
	Retail	25,000 sf	--	2.2371	56	--
64	Condominiums	39 du	3.17	--	124	39
68	Apartments	363 du	3.17	--	1,151	363
	Retail	7,740 sf	--	2.2371	18	--
72	Condominiums	311 du	3.17	--	986	311
76	Condominiums	130 du	3.17	--	413	130
	Retail	7,037 sf	--	2.2371	16	--
80	Apartments (Ph 1)	90 du	3.17	--	286	90
	Retail (Ph 1)	15,500 sf	--	2.2371	35	--
	Apartments (Ph 2)	82 du	3.17	--	260	82
	Retail (Ph 2)	17,300 sf	--	2.2371	39	--
82	Gas Station with Canopy & Mini-Market (Reconstruct)	2,046 sf	--	2.2371	5	--
	Gas Station with Canopy & Mini-Market (Demolish)	*2,044 sf*	--	*2.2371*	*(5)*	--
86	Apartments	204 du	3.17	--	647	204
	Retail	5,000 sf	--	2.2371	12	--

Table IV-13
Cumulative Population and Housing Growth

Related Project No.	Project Description Land Use	Size Dwelling Unit (du) Square Feet (sf)	Generation Rates Population[(a)] (resident/du)	Generation Rates Employment[(b)] (employee/ 1,000 sf)	Total Population (persons)	Total Housing (du)
89	Condominiums	240 du	3.17	--	761	240
104	Condominiums	407 du	3.17	--	1,291	407
	Retail	7,472 sf	--	2.2371	17	--
105	Condominiums	334 du	3.17	--	1,059	334
	Retail	10,000 sf	--	2.2371	23	--
107	Condominiums	130 du	3.17	--	413	130
	Retail	7,030 sf	--	2.2371	16	--
113	Condominiums	425 du	3.17	--	1,348	425
	Apartments	425 du	3.17	--	1,348	425
115	Condominiums	420 du	3.17	--	1,332	420
	Retail	40,000 sf	--	2.2371	90	--
118	Condominiums	186 du	3.17	--	590	186
	Retail	6,200 sf	--	2.2371	14	--
				Total Related Projects	***31,727***	*8,183*
				Proposed Project (Net)	*438*	*140*
				Total Cumulative	***32,165***	***8,323***

Notes:
All calculations are rounded up for a conservative analysis.
rm = rooms, du = dwelling units, sf = square feet, st = students, emp = employees, n/a = not available
[a] *Based on average household size for multi-family dwelling units in the Westlake CPA of 3.17 persons per multi-family unit in 2008.*
[b] *Based on employee generation rates provided by Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, February 25, 2008.*
[c] *Calculation assumes office generation rate for a conservative analysis.*
Source: The Mobility Group, March 2009.
Source (table): Christopher A. Joseph & Associates, May 2009.

Housing

The approximately 8,323 cumulative new housing units represent approximately 850 percent more growth than the 876-unit housing growth anticipated by SCAG for the Westlake CPA between 2010 and 2011.

Of these 8,323 housing units, only a net increase of 140 housing units[81] would be attributed to the proposed Project. These 140 housing units represent approximately 1.7 percent of the cumulative housing growth generated by the related projects. As 1.7 percent is not considered to be a substantial contribution to cumulative housing growth, the proposed Project's contribution to cumulative housing impacts would be less than significant.

[81] *153 units (proposed) –13 units (existing)=140 net residential units*

13. PUBLIC SERVICES

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

a) Fire protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the proposed Project based upon response time, access, or fire/hydrant/water availability, necessitating a new or physically altered fire station. Although the Project would increase demand on existing fire services and facilities, the Project 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. Standard LAFD and LAMC 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

Construction of the proposed Project would increase the potential for accidental on-site fires from sources such as the operation of mechanical equipment and use of flammable construction materials. In most cases, the implementation of "good housekeeping" procedures by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures that would be implemented during construction of the proposed Project development include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

- Construction impacts are temporary in nature and do not cause lasting effects;
- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which 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. Additionally, if there are partial closures to streets surrounding the Project site, flagmen would be used to facilitate the traffic flow until construction is complete; and

- The Project site is currently within the required 1.5-mile radius of three LAFD fire stations, including Fire Stations 3, 11, and 20 (see Table IV-14, Project Site Fire Protection Services). Further, the Project site would continue to be in close proximity to LAFD fire stations throughout the duration of the construction period.

Based on the above information, construction of the proposed Project would not be expected to tax fire fighting and emergency services to the extent that there would be a need for new, expanded, consolidated, or relocated fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. During demolition, the Project would remain clean and unobstructed and flagmen would be utilized to facilitate the traffic flow until construction is complete, specifically if there are partial closures to streets surrounding the Project site. Therefore, construction impacts related to fire protection would be less than significant and no mitigation measures are required. As such, no further analysis of this issue in an environmental impact report is necessary.

Operation

As discussed in Response 12(a), Population and Housing, the proposed Project would result in a net increase of approximately 140 dwelling units and 438 permanent residents to the Westlake CPA. Implementation of the proposed Project could also be expected to increase the number of site visitors (i.e., at the proposed residences) within the Project site, though the number of site visitors cannot be calculated with accuracy. The increase in residents and visitors to the Project site would generate an increase in the demand for fire protection. The discussion below considers the major criteria for determining the proposed Project's potential impacts on fire protection, including: fire station response time and distance, fire flows and hydrants, and emergency access.

Fire Station Response Time and Distance

The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07(C) of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; while for a commercial land use, the distance is one mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

The Project would be served by three fire stations – Fire Station 3, located at 108 North Freemont Street in the Bunker Hill area, approximately 0.5 miles southeast of the Project site; Fire Station 11, located at 1819 West 7th Street in the Westlake area, approximately 1.4 miles southwest of the Project site; and Fire Station 20, located at 2144 West Sunset Boulevard in the Echo Park area, approximately 1.4 miles north of the Project site. Table IV-14 provides an overview of the Project site's fire protection services, including equipment, staff, and response times to Project site.

In accordance with the LAMC, the response distances from each of the three fire stations listed above to the Project site would meet and exceed the desired response distance standards of the LAFD. Additionally, the existing fire equipment and response times are adequate to meet the current demand for fire service and desired performance standards of the LAFD. Additionally, the proposed Project would not generate the need for construction of new or expanded fire protection facilities, based on adequate staffing, resources, response times, and distance of fire stations to the Project site.[82] Therefore, impacts would be less than significant and no mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

Table IV-14
Project Site Fire Protection Services

Station No.	Location	Equipment and Staff	Distance to Project Site (miles)	Response Time to Project Site (minutes)

3	108 North Freemont Street	• 1 Light Force
		  • 1 Truck
		  • 1 Engine
		• 1 Fire Engine
		• 1 Paramedic Rescue Ambulance
		• 1 Basic Life Support Rescue Ambulance
		• Staff of 16 at all times
			0.5	3.4

11	1819 West 7th Street	• 1 Light Force
		  • 1 Truck
		  • 1 Engine
		• 1 Fire Engine
		• 1 Paramedic Rescue Ambulance
		• 1 Basic Life Support Rescue Ambulance
		• Staff of 14 at all times
			1.4	5.7

20	2144 West Sunset Boulevard	• 1 Light Force
		  • 1 Truck
		  • 1 Engine
		• 1 Fire Engine
		• 1 Paramedic Rescue Ambulance
		• Staff of 12 at all times
			1.4	5.7

Source: Captain II - Paramedic William N. Wells, City of Los Angeles Fire Department, written correspondence, July 22, 2008.

Fire Flow and Hydrants

City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In all cases, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the

[82] *Wells, William N., Captain II-Paramedic, Planning Section, Los Angeles Fire Department (LAFD), written correspondence, CAJA staff, July 22, 2008.*

required gpm is flowing.[83] The required fire flow is closely related to the type and size of the land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. The overall fire flow requirement for the Project site, as indicated in Table 9-A of the Los Angeles Fire Code, is 4,000 gpm from four fire hydrants flowing simultaneously with a minimum residual pressure of 20 PSI.[84] The Project is currently under review by the LAPD to determine whether the pressure in the Project area is sufficient to meet City requirements. The Fire Department may use discretionary action to evaluate fire flow requirements within the immediate area that borders the Project. Fire flow requirements could necessitate a higher performance standard.[85] Additionally, any potential changes in existing hydrants along the Project frontages would be reviewed by the LAFD prior to site plan approval. If fire flows and pressures are determined to be insufficient, then upgrades to the existing infrastructure would be necessary. Therefore, Project impacts on fire flow would be less than significant and no mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

Emergency Access

The LAMC (Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.03, Fire Department Access) provides specific standards outlining that any person owning or having control of any facility, structure, group of structures or premises shall provide and maintain LAFD access in accordance with provisions of Section 57.09.03.

Fire truck access would be available along the adjacent alley and fronting streets. Emergency vehicle access to the Project site is provided from roadways near and adjacent to the site. Roadways near the Project site include South Witmer Street, West 1st Street and West 2nd Street. West Beverly Boulevard and South Lucas Avenue are located adjacent to the Project site. Additionally, 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. As such, Project impacts on emergency access would be less than significant and no mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

Cumulative Impacts

Less Than Significant Impact. The proposed Project, in combination with the 134 related projects identified in Section II, Project Description, of this Initial Study, would increase the demand for LAFD staffing, equipment, and facilities over an extended period of time. In order to accommodate the demand

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[83] *City of Los Angeles Municipal Code, Chapter 5 (Public Safety and Protection), Article 7 (Fire Protection and Prevention), Division 9 (Access, Hydrants, and Fire-Flow Requirements), Section 57.09.06 (Fire-Flow), Table 9-A (Fire-Flow by Type of Land Development).*

[84] *Comfort, Frank K.., Captain I, Hydrants and Access/Construction Services, Los Angeles Fire Department Bureau of Fire Prevention, electronic correspondence, CAJA staff, August 11, 2008*

[85] *Ibid.*

for increased services, additional funding would need to be provided to the City of Los Angeles. Consistent with existing mechanisms (i.e., property taxes, government funding, and developer fees) to increase funding for protection services, the proposed Project and all related projects would be required to monetarily contribute to these funds. Similar to the proposed Project, each of the 134 related projects would be individually subject to LAFD review during the building permit process, and would be required to comply with all applicable fire safety standards as a result in order to adequately mitigate fire protection impacts. Therefore, it is expected that cumulative impacts to fire protection would be less than significant and no mitigation measures are required.

b) Police protection?

Less Than Significant with Mitigation. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

The Project site is currently served by Los Angeles Police Department's (LAPD) Rampart Community Police Station (Station) located at 2710 West Temple Street[86], approximately 1.2 miles northwest of the Project site. The Station includes a staff of approximately 331 sworn officers and 24 civilian staff.[87] The Rampart Community Police Station serves a community area encompassing 7.4 square miles[88] and a population of approximately 375,000 residents.[89] The Station serves the areas of Angelino Heights, Echo Park, historic Filipinotown, Korea Town, Lafayette Park, Macarthur Park, Pico-Union, Temple-Beaudry, Virgil Village, and Westlake.[90] The service boundaries of the Rampart Area include Santa Monica Boulevard and Sunset Boulevard to the north, Santa Monica Freeway to the south, Harbor Freeway to the east, and Normandie Avenue to the west. Per the LAPD, the Project site is located within Reporting District (RD) 237. The service boundaries for RD 237 include Temple Street to the north, Third Street to the south, Harbor Freeway to the east, and Union Avenue to the west.[91]

Table IV-15, RD 237, Rampart Area, and Citywide Crime Statistics for 2007, provides a comparison of crime statistics for RD 237, Rampart Area, and Citywide crime statistics for 2007.

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[86] *Los Angeles Police Department, Community Police Station Address Directory, website: http://www.lapdonline.org/our_communities/content_basic_view/6279, August 5, 2008.*

[87] *Chief of Police William J. Bratton and Lieutenant Douglas G. Miller, Officer in Charge, City of Los Angeles Police Department, Community Relations Section, Office of the Chief of Police, as prepared by Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, written correspondence, August 25, 2008.*

[88] *Ibid.*

[89] *Los Angeles Police Department, About Rampart, website: http://www.lapdonline.org/rampart_community_police_station /content_basic_view/1657, August 5, 2008.*

[90] *Los Angeles Police Department, Rampart Community Police Station, website: http://www.lapdonline.org/rampart_community_police_station, August 5, 2008.*

[91] *Chief of Police William J. Bratton and Lieutenant Douglas G. Miller, Officer in Charge, City of Los Angeles Police Department, Community Relations Section, Office of the Chief of Police, as prepared by Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, written correspondence, August 25, 2008.*

Table IV-15
RD 237, Rampart Area, and Citywide Crime Statistics for 2007

Type of Crime	Number of Crimes		
	RD 237	**Rampart Area**	**Citywide**
Burglary from Business	0	108	3,441
Burglary from Residence	18	571	13,721
Burglary Other	3	85	2,485
Street Robbery	26	1,007	9,811
Other Robbery	6	230	3,668
Murder	2	25	394
Rape	3	63	997
Aggravated Assault	26	839	12,960
Burglary from Vehicle	19	1,017	21,081
Theft from Vehicle	19	428	9,482
Grand Theft	13	412	11,675
Theft from Person	3	107	1,049
Purse Snatch	0	32	347
Other Theft	7	619	14,513
Vehicle Theft	39	1,317	24,391
Bunco	0	44	349
Bike Theft	1	37	221
Total Crimes	**237**	**6,987**	**130,585**

Note: *RD = Reporting District*
Source: *Chief of Police William J. Bratton and Lieutenant Douglas G. Miller, Officer in Charge, City of Los Angeles Police Department, Community Relations Section, Office of the Chief of Police, as prepared by Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, written correspondence, August 25, 2008.*

As shown in Table IV-15, RD 237 had approximately 237 crimes in 2007, with predominant crimes being street robbery, burglary from vehicle and vehicle theft.[92] Because the population of RD 237 is not available, it is not possible to determine the crime rate for RD 237. Also shown in Table IV-15, the Rampart Area had approximately 6,987 crimes in 2007, with predominant crimes being street robbery, burglary from vehicle and vehicle theft. Therefore, the crime rate in the Rampart Area in 2007 was approximately 22 crimes per 1,000 persons.[93] For comparative purposes, in 2007 the City of Los Angeles had approximately 130,585 crimes, for a citywide crime rate in 2007 of approximately 30 crimes per

[92] *Chief of Police William J. Bratton and Lieutenant Douglas G. Miller, Officer in Charge, City of Los Angeles Police Department, Community Relations Section, Office of the Chief of Police, as prepared by Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, written correspondence, August 25, 2008.*

[93] *[(6,987 crimes) ÷ (317,320 residents) x (1,000)] = 22 crimes per 1,000 persons. (Source: Chief of Police William J. Bratton and Lieutenant Douglas G. Miller, Officer in Charge, City of Los Angeles Police Department, Community Relations Section, Office of the Chief of Police, as prepared by Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, written correspondence, August 25, 2008.)*

1,000 persons.[94] Based on the crime rates for 2007, the City of Los Angeles as a whole had approximately eight percent more crime per capita than the Rampart Area.

As proposed the Project would implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of people at all times of the day would provide a sense of security during evening and early morning hours. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. Additionally, the proposed 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. The follow discussion addresses potential construction and operational impacts anticipated with development of the proposed Project.

Construction

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious. Deployment of roving security guards is also an effective strategy in preventing problems from developing. The Project would employ construction security features, such as fencing, which would serve to minimize the need for LAPD services. The proposed Project design would address access control to proposed structures including parking areas, proposed security lighting, landscaping planning and minimization of "dead space" to eliminate areas of concealment, and provision of security patrol throughout the Project site if needed. The concepts of the "Design out Crime" initiative related to environmental design, published by LAPD, would be used for reference. All crime prevention features would be reviewed and approved by the LAPD prior to the issuance of a building permit.

Traffic generated by construction workers and trucks would occur primarily during off-peak traffic hours. Although minor traffic delays may result from construction activities at times, these impacts would be temporary in nature and would be coordinated with local police and emergency officials. Therefore, construction impacts related to police protection would less than significant and no mitigation measures are required. As such, further analysis of this issue in an environmental impact report is not necessary.

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[94] *[(130,585 crimes) ÷ (4,346,867 residents) x (1,000)] = 30 crimes per 1,000 persons. (Source: Chief of Police William J. Bratton and Lieutenant Doug Miller, Officer in Charge, City of Los Angeles Police Department, Community Relations Section, Office of the Chief of Police, as prepared by Officer Nina Preciado, Community Relations Section, Crime Prevention Unit, written response to request for service information, May 27, 2008.)*

Operation

As discussed in Response 13(a) above, the proposed Project would result in a net increase of approximately 140 residential dwelling units and 438 permanent residents to the Westlake CPA. Also, it is anticipated that implementation of the proposed Project would also increase the number of site visitors (i.e., at the proposed residences) to the Project site, though the number of site visitors cannot be calculated with accuracy. The increase in residents and visitors to the site would be anticipated to generate an increase in the demand for police protection within vicinity of the Project. Although there is not a direct proportional relationship between increases in land use activity and increases in demand for police protection, the number of calls for police response to home burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the increase in on-site activity and increased traffic on adjacent streets and arterials. The discussion below considers the major criteria for determining the proposed Project's potential impacts on police protection services, including officer-to-population ratio, response time and emergency vehicle access.

Officer-to-Population Ratio

Currently, the Rampart Community Police Station has an officer-to-population ratio of approximately one officer per 1,133 residents.[95] With the construction of the proposed Project, a net increase of 438 persons would be anticipated within the Westlake Community Plan Area and area served by the Rampart Community Police Station. The new persons introduced to the Project site would increase the current officer-to-population ratio of the Rampart Community Police Station from 1,133 residents per officer to approximately one officer per 1,135 residents.[96] Though the proposed Project's demand for police services would result in a need for one new officer to maintain the current officer-to-population ratio, the addition of one new officer to the Rampart Community Police Station would improve the officer-to-population ratio beyond current conditions. Under the conservative assumption that the Project would require the addition of one officer to maintain the existing service level in the Rampart Division, it is not anticipated that the addition of one officer would require the enlargement or relocation of the Rampart Community Police Station, or the construction of an additional station. Therefore, operational impacts related to the officer-to-population ratio would be less than significant and no mitigation measures are required.

Response Times

Response time is the amount of time from when a call requesting assistance is made until the time that a police unit responds to the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection (as discussed in Response 13(a) above), police units are most often in a

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[95] *(375,000 residents served by Rampart Community Police Station) ÷ (331 police officers) = 1,133 residents per officer.*

[96] *[(375,000 residents served by the Rampart Community Police Station + 438 net Project residents) ÷ (331 police officers)] = 1,135 people per officer.*

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 in the Rampart Wilshire Area during 2007 was approximately 7.0 minutes. The Citywide average during 2007 was approximately 6.9 minutes.[97]

Emergency Access

Emergency vehicle access to the Project site would continue to be provided by existing selected disaster routes located near the Project site (i.e., West Beverly Boulevard, Western Avenue and North Alvarado Street),[98] and the roadways adjacent to the Project site (i.e., South Witmer Street and South Lucas Avenue). The proposed Project would be required to be built according to code to ensure proper emergency access. Therefore, operational impacts related to emergency access would be less than significant significant.

LAPD Review

In a letter dated August 25, 2008 (see Appendix A, Letters from Public Service and Utility Agencies, to this Initial Study), it is noted that the proposed Project would have a moderate impact on police services in the Rampart Area. The LAPD strongly recommends that developers contact the Crime Prevention Unit of the LAPD for advice with respect to crime prevention features that may be incorporated into the design of the proposed Project. Furthermore, the LAPD encourages developers to provide the Rampart Area Commanding Officer with a diagram of each portion of the property. The diagram should include access routes and any additional information that might facilitate police response.[99]

Project Impacts

Based on the analysis above, construction and operational impacts associated with the proposed Project would be less than significant. The proposed Project would include standard security measures such as adequate security lighting and secure parking facilities. While, the proposed Project would not require the construction of a new or expansion to an existing police station, and would not impede emergency response times, therefore Project impacts to police protection services would be less than significant, the

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[97] *Chief of Police William J. Bratton and Lieutenant Douglas G. Miller, Officer in Charge, City of Los Angeles Police Department, Community Relations Section, Office of the Chief of Police, as prepared by Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, written correspondence, August 25, 2008.*

[98] *City of Los Angeles General Plan, Safety Element, Exhibit H: Critical Facilities and Lifeline Systems in the City of Los Angeles, March 1994, website: http://www.lacity.org/pln/Cwd/GnlPln/Index.htm, September 2, 2008.*

[99] *Chief of Police William J. Bratton and Lieutenant Doug Miller, Officer in Charge, City of Los Angeles Police Department, Community Relations Section, Office of the Chief of Police, as prepared by Officer Marco Jimenez, Community Relations Section, Crime Prevention Unit, written response to request for service information, August 25, 2008.*

following mitigation measures are recommended to further reduce the Project's potential impacts to the LAPD.

Mitigation Measures

13-1 The Project Applicant shall contact the Crime Prevention Unit of the Los Angeles Police Department for advice with respect to crime prevention features and shall incorporate any feasible features into the design of the proposed Project.

13-2 The Project Applicant shall provide the Rampart Area Commanding Officer with the diagram of each portion of the property. The diagram shall include the access routes and any additional information that might facilitate police response as requested by the Rampart Area Commanding Officer.

Cumulative Impacts

Less Than Significant Impact. The proposed Project, in conjunction with the 134 related projects identified in Section II, Project Description, of this Initial Study, would increase the demand for police protection services in the Project area. Specifically, there would be increased demands for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (i.e., property taxes and government funding) to which the applicants of the proposed Project and related projects would be required to contribute.

As discussed above, the proposed Project is located within the Rampart Area and would be served by the Rampart Community Police Station. Of the 134 related projects, 30 (Related Project No. 3, 4, 5, 7, 8, 9, 11, 12, 14, 16, 17, 20, 25, 33, 34, 61, 64, 68, 72, 76, 80, 82, 89, 104, 105, 107, 108, 113, 115, 122) would be served by the Rampart Community Police Station.[100] As shown in Table IV-16, Estimated Cumulative Police Service Population, the related projects plus the proposed Project would result in a 25,615-person cumulative increase in the police service population for the Rampart Community Police Station. The proposed Project would account for approximately 1.7 percent of the cumulative increase in police service population.

[100] *City of Los Angeles Police Department, Our Communities, RD Map of Rampart Area, website: http://www.lapdonline.org/assets/pdf/Rampart_RD_09.pdf, May 21, 2009; City of Los Angeles Police Department, Our Communities, Find Your Neighborhood, website: http://www.lapdonline.org/our_communities, May 21, 2009; and The Mobility Group, Beverly + Lucas Project, Traffic Study, Figure 8: Location of Cumulative Projects, March 6, 2009.*

Table IV-16
Estimated Cumulative Police Service Population

Related Project No.	Land Use	Size	Police Service Population Generation Rate[a]	Total Police Service Population
3	Apartments	87 du	3 persons/unit	261
	Commercial	70,231 sf	3 persons/1,000 sf	211
4	Office	5,432 sf	4 persons/1,000 sf	22
	Uniform Sales Store	7,168 sf	3 persons/1,000 sf	22
5	Grocery	40,000 sf	3 persons/1,000 sf	120
	Retail	30,000 sf	3 persons/1,000 sf	90
	Community Facility[b]	40,000 sf	4 persons/1,000 sf	160
7	Apartments	21 du	3 persons/du	63
8	Condominiums	460 du	3 persons/du	1,380
9	Apartments	102 du	3 persons/du	306
	Retail	4,212 sf	3 persons/1,000 sf	13
11	Apartments	600 du	3 persons/du	1,800
	Retail	20,000 sf	3 persons/1,000 sf	60
12	Affordable Apartments	75 du	3 persons/du	225
14	Apartments	261 du	3 persons/du	783
	Specialty Retail	6,398 sf	3 persons/1,000 sf	20
16	Condominiums	54 du	3 persons/du	162
17	Office	880,000 sf	4 persons/1,000 sf	3,520
20	Imageing Center, Pharmacy, Surgical Suites & Physician Offices	150,000 sf	4 persons/1,000 sf	600
25	Apartments	725 du	3 persons/du	2,175
	Retail	39,999 sf	3 persons/1,000 sf	120
33	Office	25,500 sf	4 persons/1,000 sf	102
	Exam Facility	50 visitors	n/a	n/a
	Conference Facility	350 visitors	n/a	n/a
34	High-Rise Condominiums	132 du	3 persons/du	396
	Condominiums	73 du	3 persons/du	219
	Apartments	46 du	3 persons/du	138
	Retail	19,103 sf	3 persons/1,000 sf	58
61	Condominiums	118 du	3 persons/du	354
	Retail	3,000 sf	3 persons/1,000 sf	9
64	Condominiums	39 du	3 persons/du	117
68	Apartments	363 du	3 persons/du	1,089
	Retail	7,740 sf	3 persons/1,000 sf	24
72	Condominiums	311 du	3 persons/du	933
76	Condominiums	130 du	3 persons/du	390
	Retail	7,037 sf	3 persons/1,000 sf	22
80	Apartments (Ph 1)	90 du	3 persons/du	270
	Retail (Ph 1)	15,500 sf	3 persons/1,000 sf	47
	Apartments (Ph 2)	82 du	3 persons/du	246
	Retail (Ph 2)	17,300 sf	3 persons/1,000 sf	52
82	Gas Station with Canopy & Mini-Market (Reconstruct)	2,046 sf	3 persons/1,000 sf	7
	Gas Station with Canopy & Mini-Market	*2,044 sf*	*3 persons/1,000 sf*	*(7)*

Table IV-16
Estimated Cumulative Police Service Population

Related Project No.	Land Use	Size	Police Service Population Generation Rate[a]	Total Police Service Population
	(Demolish)			
89	Condominiums	240 du	3 persons/du	720
104	Condominiums	407 du	3 persons/du	1,221
	Retail	7,472 sf	3 persons/1,000 sf	23
105	Condominiums	334 du	3 persons/du	1,002
	Retail	10,000 sf	3 persons/1,000 sf	30
107	Condominiums	130 du	3 persons/du	390
	Retail	7,030 sf	3 persons/1,000 sf	22
108	Condominiums	420 du	3 persons/du	1,260
113	Condominiums	425 du	3 persons/du	1,275
	Apartments	425 du	3 persons/du	1,275
115	Condominiums	420 du	3 persons/du	1,260
	Retail	40,000 sf	3 persons/1,000 sf	120
122	Gratts Primary School	380 seats	n/a	n/a
		176 st	n/a	n/a
			Total Related Projects	*25,177*
			Proposed Project (Net)	*438*
			Total Cumulative	***25,615***

Notes:
All calculations are rounded up for a conservative analysis.
du = dwelling unit; sf = square feet; st = students; n/a = not available
[a] *Based on police service population conversion factors in City of Los Angeles, L.A. CEQA Thresholds Guide, May 14, 1998. Updated 2006.*
[b] *Calculation assumes office generation rate for a conservative analysis.*
Source (related projects): The Mobility Group, March 2009.
Source (table): Christopher A. Joseph & Associates, May 2009.

The addition of roughly 25,615 persons to the Rampart Area could result in a demand for additional police officers and facilities for the Rampart Community Police Station in order to maintain the existing level of police protection for the area. In order to maintain the existing ratio of officer-to-population in the Rampart Area, approximately 23 additional officers would be necessary.[101] These needs would be funded via existing City of Los Angeles mechanisms (e.g. sales tax, government funding, developer fees, etc.) to which the proposed project and the 134 potential related projects would contribute. In addition, each of the related projects would be individually 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. Furthermore, each of the related projects would likely incorporate adequate crime prevention techniques and design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. Therefore, a less-than-significant cumulative impact on police protection services would occur and no mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

[101] *[(25,615 new persons) ÷ (1,133 persons per officer)] = 23 officers.*

c) Schools?

Less Than Significant Impact with Mitigation. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district. Public schools in the City of Los Angeles are under the jurisdiction of the Los Angeles Unified School District (LAUSD). The ability of the LAUSD schools serving the Project site to accommodate the proposed Project is analyzed by comparing school enrollments and capacities provided by LAUSD to the projected student population increase anticipated with the development of the proposed Project. It is anticipated that the proposed Project would generate students when construction is complete and the residential units are occupied. In order to determine the proposed Project's impact to schools, an analysis of current and future enrollments and capacities is presented below.

The Project site is located in Local District 4 and is located within a Middle School and High School Service Area Attendance Option Area.[102] There are seven LAUSD schools that currently serve the Project site, including one elementary school, two middle schools, and four high schools. The LAUSD schools that currently serve the Project site are listed in Table IV-17, LAUSD Schools Serving the Project Site, below.

Table IV-17
LAUSD Schools Serving the Project Site

School	Grades Served	Location
Elementary Schools		
Evelyn Thurman Gratts Elementary School	K-5	309 South Lucas Avenue
Middle Schools		
Liechty Middle School	6-8	650 South Union Avenue
Virgil Middle School	6-8	152 North Vermont Avenue
High Schools		
Belmont Senior High School	9-12	1575 West 2nd Street
Los Angeles High School for the Arts	9-12	1575 West 2nd Street
Civitas School of Leadership	9-10	1200 West Colton Street
Miguel Contreras Learning Center	9-12	322 South Lucas Avenue
Los Angeles School of Global Studies	9-12	322 South Lucas Avenue

Source: Glenn Striegler, Environmental Assessment Coordinator, Office of Environmental Health and Safety, Los Angeles Unified School District, written correspondence, CAJA staff, September 3, 2008.

As shown in Table IV-18 below, Estimated Proposed Project Student Generation, development of the proposed Project would generate a net increase of approximately 17 elementary students, 9 middle school students, and 9 senior high school students, for a total net increase of approximately 35 students.

[102] *Rena Perez, Director, Master Planning & Demographics, Facilities Services Division, Los Angeles Unified School District, written correspondence, CAJA Staff, August 28, 2008.*

Table IV-18
Estimated Proposed Project Student Generation

Project	Size (du)	Elementary School Students [a]	Middle School Students [a]	High School Students [a]	Total Students
Existing					
Single-Family Residences	1	1	1	1	3
Multi-Family Residences	12	2	1	1	4
Proposed					
Multi-Family Residences	153	20	11	11	42
Proposed Project Net Increase		***17***	***9***	***9***	***35***

Notes: du = dwelling unit.
All calculations are rounded up for a conservative analysis.
[a] *Based on LAUSD student generation rates for single- and multi-family residential uses as follow: 0.1958 elementary, 0.0933 middle and 0.1062 high school students per dwelling unit (single-family detached units), and 0.1266 elementary, 0.0692 middle and 0.0659 high school students per dwelling unit (multi-family attached units).*
(Source: Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, February 25, 2008)
Source: Craig Lawson & Co., LLC, May 2008. Christopher A. Joseph & Associates, May 2009.

Although it is very likely that some of the students generated by the proposed Project would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all students generated by the proposed Project would be new to the school district. As such, the proposed Project would introduce approximately 35 new students to the school district, which does not constitute a substantial increase in student populations to the area that could potentially cause the construction of new or expanded school facilities.

Nevertheless, as shown in Table IV-19 below, Proposed Project Impact on Public Schools, Evelyn Thurman Gratts Elementary School is current operating at acceptable capacity levels, while both Liechty and Virgil Middle Schools are exceeding current capacity levels for the 2007-2008 school year. However, the projected demand for Evelyn Thurman Gratts Elementary, Virgil Middle School, and the Service Area schools (total) would fall short of projected capacity.[103] As the existing schools that serve the Project site would not have adequate capacity to serve Project-generated students, new or expanded schools would be needed to adequate serve the student population and to avoid overcrowding. Eight new schools are proposed for construction within the Project area to help relieve known school overcrowding. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may be other overcrowded schools not listed above that are also targeted to be relieved by new schools. Therefore, it should not be assumed that these planned school capacities would be allocated solely towards offsetting overcrowding at the existing schools referenced.[104]

[103] *Rena Perez, Director, Master Planning & Demographics, Facilities Services Division, Los Angeles Unified School District, written correspondence, CAJA Staff, August 28, 2008.*

[104] *Glenn Striegler, Environmental Assessment Coordinator, Office of Environmental Health and Safety, Los Angeles Unified School District, written correspondence, CAJA staff, September 3, 2008.*

Table IV-19
Proposed Project Impact on Public Schools

School	2007-2008 Enrollment Capacity	2007-2008 Student Enrollment	Project-Generated Students	Student Enrollment with Project[a]	(-)Under / (+)Over Capacity (w/o Project)	(-)Under / (+)Over Capacity (w/ Project)
Elementary Schools						
Evelyn Thurman Gratts E.S.	953	903	17	920	+50	+33
Middle Schools						
Liechty M.S.	1,927	2,039	9	2,048	-112	-121
Virgil M.S.	2,529	3,124		3,133	-595	-604
High Schools						
Belmont Senior H.S.	--	--	--	--	--	--
Los Angeles H.S. for the Arts	--	--	--	--	--	--
Civitas School of Leadership	--	--	--	--	--	--
Miguel Contreras L.C.	--	--	--	--	--	--
Los Angeles School of G.S.	--	--	--	--	--	--
Service Area Schools Total	***9,797***	***9,987***	***35***	***10,022***	***+190***	***+225***

Notes: E.S.= Elementary School, M.S. = Middle School, H.S. = High School, L.C. = Learning Center, G.S. = Global Studies
[a] *Calculation assumes all project-generated students would attend each of the above-listed schools for a conservative analysis.*
Source (2007 – 2008 enrollment capacity and student enrollment): Rena Perez, Director, Master Planning & Demographics, Facilities Services Division, Los Angeles Unified School District, written correspondence, CAJA Staff, August 28, 2008.

The California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan[105] has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code. Thus, in accordance with the provisions of these regulations, the payment of this fee is deemed to fully mitigate any impact to school facilities.

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 laws (Government Code Section 65996). Furthermore, per Section 65995.5-7 of the California Government Code, LAUSD has imposed Level 2 residential developer fees at a rate of $3.83 per square foot of new residential construction,

[105] *Los Angeles Unified School District, School Facilities Fee Plan, March 2, 2002.*

effective October 23, 2008 through October 22, 2009. In addition, developers of affordable housing that meet LAUSD requirements may be eligible for the Level 1 residential rate of $2.97 per square foot.[106]

Although the proposed Project's impact on LAUSD schools would be negligible through the introduction of approximately 35 new net students to the LAUSD, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, Project impacts would be less-than-significant and no mitigation measures are required.

Mitigation Measure

13-3 Pursuant to standard regulatory compliance the Project Applicant shall abide by California Education Code Section 17620(a)(1) and shall be obligated to pay any required developer impact fees as established at the time of Project development.

Cumulative Impacts

Less Than Significant Impact. The proposed Project, in combination with the 134 related projects identified in Section II, Project Description, of this Initial Study, would increase demand for school services in the Project area. As with the proposed Project, it is likely that some of the students generated by the related projects would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all the students generated by the related projects would be new to the LAUSD. Related projects that provide entirely educational uses such as schools, as well as other uses such as senior care facilities and religious institutions are not expected to generate students. As shown in Table IV-20 below, Estimated Cumulative Student Generation, the related projects plus the proposed Project would generate an increase of approximately 4,798 elementary students, 2,692 middle school students, and 2,576 high school students, for a total increase of approximately 10,066 students.

The potential exists that not all of the students generated by the related projects in Local District 4 would attend Evelyn Thurman Gratts Elementary School, Virgil Middle School, Liechty Middle School, Miguel Contreras Learning Complex, Belmont Senior High School, or Edward R. Roybal Learning Center. There are 76 elementary schools, 8 middle schools, and 13 high schools in Local District 4.[107] Presumably, some of the students generated from the related projects could attend these or other schools. Further, additional schools are proposed and are being constructed in the Project area.[108] As noted, there

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[106] *Los Angeles Unified School District, Developer Fee Program Office, facsimile correspondence, October 22, 2008.*

[107] *Los Angeles Unified School District, Local District 4, List of LD4 Schools, website: http://www.lausd.net/District_4/List%20of%20LD4%20Schools.htm, August 6, 2008.*

[108] *Los Angeles Unified School District, Facilities Services Division, New Construction Strategic Execution Plan for 2008, Exhibit D: Project Summaries, website: http://www.laschools.org/sep/, August 6, 2008.*

is no excess capacity to house the projected student enrollment and construction of the new schools may not alleviate overcrowding. Therefore, to be conservative, it is concluded that the LAUSD schools that would serve the proposed Project and related projects would operate over capacities with cumulative student generation and new or expanded schools could be needed.

Table IV-20
Estimated Cumulative Student Generation

Related Project No.	Land Use	Size	Student Generation Rates (students/unit) [a, b]			Total Students
			Elementary School	Middle School	High School	
1	Community Building[c]	32,000 sf	1	1	1	3
	Performing Arts	25,000 sf	1	1	1	3
	Plaza House	14,100 sf	1	1	1	3
	Educational Center & Museum	23,700 sf	1	1	1	3
2	Artist-in-lofts	30 du	4	3	2	9
	Retail	5,000 sf	1	1	1	3
	Office	20,000 sf	1	1	1	3
3	Apartments	87 du	12	7	6	25
	Commercial	70,231 sf	2	1	1	4
4	Office	5,432 sf	1	1	1	3
	Uniform Sales Store	7,168 sf	1	1	1	3
5	Grocery	40,000 sf	1	1	1	3
	Retail	30,000 sf	1	1	1	3
	Community Facility[c]	40,000 sf	1	1	1	3
6	Condominiums	105 du	14	8	7	29
	Retail	4,500 sf	1	1	1	3
7	Apartments	21 du	3	2	2	7
8	Condominiums	460 du	59	32	31	122
9	Apartments	102 du	13	8	7	28
	Retail	4,212 sf	1	1	1	3
10	Apartments	110 du	14	8	8	30
11	Apartments	600 du	76	42	40	158
	Retail	20,000 sf	1	1	1	3
12	Affordable Apartments	75 du	10	6	5	21
13	Office Condominiums	135 du	18	10	9	37
	Live/Work Condominiums	402 du	51	28	27	106
14	Apartments	261 du	34	19	18	71
	Specialty Retail	6,398 sf	1	1	1	3
15	Condominiums	629 du	80	44	42	166
	Retail	27,000 sf	1	1	1	3
16	Condominiums	54 du	7	4	4	15
17	Office	880,000 sf	33	17	17	67
18	Auto Sales & Parking Lot	25,880 sf	1	1	1	3
19	Apartments	65 du	9	5	5	19
20	Imageing Center, Pharmacy, Surgical Suites & Physician Offices[d]	150,000 sf	5	3	3	11
21	Apartments	84 du	11	6	6	23
22	~~Performing Arts High~~	~~64 classrooms~~	~~n/a~~	~~n/a~~	~~n/a~~	~~n/a~~

Table IV-20
Estimated Cumulative Student Generation

Related Project No.	Land Use	Size	Student Generation Rates (students/unit) [a, b]			Total Students
			Elementary School	Middle School	High School	
	School					
	Performing Arts Theater	1,600 seats	n/a	n/a	n/a	n/a
23	Apartments	210 du	27	15	14	56
	Retail	10,966 sf	1	1	1	3
24	Condominiums	311 du	40	22	21	83
	Retail	7,294 sf	1	1	1	3
25	Apartments	725 du	92	51	48	191
	Retail	39,999 sf	1	1	1	3
26	Apartments	70 du	9	5	5	19
27	U.S. District Courtrooms	41 courtrooms	n/a	n/a	n/a	n/a
	Judges Chambers	40 chambers	n/a	n/a	n/a	n/a
	Support Offices	n/a	n/a	n/a	n/a	n/a
	Circuit Satellite Library	n/a	n/a	n/a	n/a	n/a
	Parking	150 spaces	n/a	n/a	n/a	n/a
28	Hotel	80 rooms	n/a	n/a	n/a	n/a
	Condo Hotel	112 du	15	8	8	31
	Condominiums	165 du	21	12	11	44
	Retail	7,500 sf	1	1	1	3
	Restaurant	13,000 sf	1	1	1	3
29	Condominiums	875 du	111	61	58	230
	Retail	34,061 sf	1	1	1	3
	Restaurants	10,000 sf	1	1	1	3
30	Loft Apartments	209 du	27	15	14	56
31	5-year Master Plan Project	n/a	n/a	n/a	n/a	n/a
32	Residential Lofts	n/a	n/a	n/a	n/a	n/a
	Retail	n/a	n/a	n/a	n/a	n/a
33	Office	25,500 sf	1	1	1	3
	Exam Facility	50 visitors	n/a	n/a	n/a	n/a
	Conference Facility	350 visitors	n/a	n/a	n/a	n/a
34	High-Rise Condominiums	132 du	17	10	9	36
	Condominiums	73 du	10	6	5	21
	Apartments	46 du	6	4	4	14
	Retail	19,103 sf	1	1	1	3
35	Office	8,200,000 sf	301	159	158	618
	Hotel	750 rooms	n/a	n/a	n/a	n/a
	Apartments	300 du	38	21	20	79
	Retail	250,000 sf	6	4	4	14
	Museum	70,000 sf	2	1	1	4
36	Loft Apartments	300 du	38	21	18	77
37	Multi-Use Development[c]	596,000 sf	14	8	8	30
38	Apartments	124 du	16	9	9	34
	Retail	12,500 sf	1	1	1	3
39	EOC/POC/FDC	433 emp	n/a	n/a	n/a	n/a
	Metro Jail	512 beds	n/a	n/a	n/a	n/a
	Occupational Health & Services Div. (OHSD)[e]	30,000 sf	2	1	1	4

Table IV-20
Estimated Cumulative Student Generation

Related Project No.	Land Use	Size	Student Generation Rates (students/unit) [a, b]			Total Students
			Elementary School	Middle School	High School	
	Fire Station #4	21 emp	n/a	n/a	n/a	n/a
40	Apartments	444 du	57	31	30	118
	Retail	30,650 sf	1	1	1	3
41	Condominiums	130 du	17	9	9	35
	Apartments	250 du	32	18	17	67
	Supermarket	30,000 sf	1	1	1	3
	High Turnover Restaurant	150,000 sf	4	2	2	8
	Retail	200,000 sf	5	3	3	11
42	Loft Apartments	157 du	20	11	11	42
43	Police Headquarters Facility (PHF)	2,400 emp	n/a	n/a	n/a	n/a
	Motor Transport Division (MTD)	56 emp	n/a	n/a	n/a	n/a
	Recreation Center[c]	60,000 sf	2	1	1	4
	Aiso St. Parking Facility	300 spaces	n/a	n/a	n/a	n/a
44	Restaurant	13,921 sf	1	1	1	3
	Retail	726 sf	1	1	1	3
	Pool/Event	726 sf	1	1	1	3
45	Elementary School	875 st	0	0	0	0
46	Apartments	280 du	36	20	19	75
	Retail	22,000 sf	1	1	1	3
47	Live/Work Lofts	91 du	12	7	6	25
48	Condominiums	80 du	11	6	6	23
	Apartments	299 du	38	21	20	79
49	Lofts	82 du	11	6	6	23
50	Congregate Care Facility	200 du	0	0	0	0
51	Apartments	20 du	3	2	2	7
	Office	32,670 sf	2	1	1	4
	Retail	37,600 sf	1	1	1	3
	Condominiums	565 du	72	40	38	150
52	Live/Work Condominiums	190 du	25	14	13	52
	Retail	5,540 sf	1	1	1	3
53	Condominiums	223 du	29	16	15	60
	Cultural Center	7,000 sf	1	1	1	3
	Restaurant	15,000 sf	1	1	1	3
	Retail	22,008 sf	1	1	1	3
54	Condominiums	93 du	12	7	7	26
55	Restaurant	11,018 sf	1	1	1	3
	Retail	8,927 sf	1	1	1	3
	Health Club	5,066 sf	1	1	1	3
56	Hall of Justice	30 emp	n/a	n/a	n/a	n/a
	Parking Structure	1,000 spaces	n/a	n/a	n/a	n/a
57	Condominiums	55 du	7	4	4	15
	Retail	28,000 sf	1	1	1	3
58	Entertainment	33,423 sf	1	1	1	3
59	Hotel	1,200 rooms	n/a	n/a	n/a	n/a

Table IV-20
Estimated Cumulative Student Generation

Related Project No.	Land Use	Size	Student Generation Rates (students/unit) [a, b]			Total Students
			Elementary School	Middle School	High School	
	Cinema	3,600 seats	n/a	n/a	n/a	n/a
	Theatre	7,000 seats	n/a	n/a	n/a	n/a
	Restaurants	345,000 sf	9	5	5	19
	Retail	498,000 sf	12	10	10	32
	Office	165,000 sf	7	4	4	15
	Apartments	800 du	102	56	53	211
60	Hotel	480 rooms	n/a	n/a	n/a	n/a
	Condominiums	836 du	106	58	56	220
	Office	988,225 sf	37	20	19	76
	Retail	46,000 sf	2	1	1	4
61	Condominiums	118 du	15	9	8	32
	Retail	3,000 sf	1	1	1	3
62	Condominiums	273 du	35	19	18	72
	Retail	18,000 sf	1	1	1	3
63	Condominiums	464 du	59	33	31	123
	Retail	25,000 sf	1	1	1	3
64	Condominiums	39 du	5	3	3	11
65	Live/Work Lofts with Restaurant/Bar	78 du	10	6	6	22
66	Condominiums	247 du	32	18	17	67
	Retail	10,675 sf	1	1	1	3
67	Condominiums	939 du	119	65	62	246
	Retail/Restaurant	83,700 sf	2	2	2	6
68	Apartments	363 du	46	26	24	96
	Retail	7,740	1	1	1	3
69	Condominiums	351 du	45	25	24	94
	Retail	125,000 sf	3	2	2	7
	Restaurant	125,000 sf	3	2	2	7
70	Condominiums	128 du	17	9	9	35
	Retail	3,472 sf	1	1	1	3
	Restaurant	2,200 sf	1	1	1	3
71	Condominiums	225 du	29	16	15	60
	Hotel	200 rooms	n/a	n/a	n/a	n/a
	Retail	30,000 sf	1	1	1	3
	Restaurant	32,000 sf	1	1	1	3
72	Condominiums	311 du	40	22	21	83
73	Bar/Lounge	8,770 sf	1	1	1	3
74	Condominiums	300 du	38	21	20	79
75	Condominiums	172 du	22	12	12	46
	Retail	6,850 sf	1	1	1	3
76	Condominiums	130 du	17	9	9	35
	Retail	7,037 sf	1	1	1	3
77	Supermarket	17,000 sf	1	1	1	3
	Retail	4,200 sf	1	1	1	3
78	Condominiums	84 du	11	6	6	23
	Bar	6,000 sf	1	1	1	3

Table IV-20
Estimated Cumulative Student Generation

Related Project No.	Land Use	Size	Student Generation Rates (students/unit) [a, b]			Total Students
			Elementary School	Middle School	High School	
79	Condominiums	570 du	73	40	38	151
	Apartments	280 du	36	20	19	75
	Retail	50,000 sf	2	1	1	4
80	Apartments (Ph 1)	90 du	12	7	6	25
	Retail (Ph 1)	15,500 sf	1	1	1	3
	Apartments (Ph 2)	82 du	11	6	6	23
	Retail (Ph 2)	17,300 sf	1	1	1	3
81	High School	1,206 st	0	0	0	0
82	Gas Station with Canopy & Mini-Market (Reconstruct)	2,046 sf	1	1	1	3
	Gas Station with Canopy & Mini-Market (Demolish)	*2,044 sf*	*(1)*	*(1)*	*(1)*	*(3)*
83	Condominiums	900 du	114	63	60	237
	Retail	19,000 sf	1	1	1	3
	Restaurant	19,200 sf	1	1	1	3
84	Apartments	74 du	10	6	5	21
85	Condominiums	213 du	27	15	15	57
	Retail	9,500 sf	1	1	1	3
86	Apartments	204 du	26	15	14	55
	Retail	5,000 sf	1	1	1	3
87	Live/Work Condominiums	132 du	17	10	9	36
88	Condominiums	330 du	42	23	22	87
	Retail	2,800 sf	1	1	1	3
	Restaurant	9,200 sf	1	1	1	3
	Health Club	56,200 sf	2	1	1	4
89	Condominiums	240 du	31	17	16	64
90	Condominiums	222 du	29	16	15	60
91	Condominiums	198 du	26	14	14	54
92	Office	960,000 sf	36	19	19	74
	Retail	100,000 sf	3	2	2	7
93	Condominiums	331 du	42	23	22	87
	Retail	10,000 sf	1	1	1	3
	Restaurant	5,985 sf	1	1	1	3
94	Condominiums	1,648 du	209	115	109	433
	Apartments	412 du	53	29	28	110
	County Office Building	681,000 sf	25	14	14	53
	Retail/Restaurant/ Supermarket/Healthclub	449,000 sf	11	6	6	23
	Hotel	275 rooms	n/a	n/a	n/a	n/a
95	Condominiums	300 du	38	21	20	79
	Retail	34,000 sf	1	1	1	3
96	Condominiums	118 du	15	9	8	32
97	Condominiums	297 du	42	21	20	83
98	Condominiums	168 du	22	12	12	46

Table IV-20
Estimated Cumulative Student Generation

Related Project No.	Land Use	Size	Student Generation Rates (students/unit) [a, b]			Total Students
			Elementary School	Middle School	High School	
99	Condominiums	250 du	32	18	17	67
	Retail	7,283 sf	1	1	1	3
100	Condominiums	190 du	25	14	13	52
101	Condominiums	550 du	70	39	37	146
102	Retail	100,000 sf	3	2	2	7
103	Office	930,000 sf	35	18	18	71
104	Condominiums	407 du	52	29	27	108
	Retail	7,472 sf	1	1	1	3
105	Condominiums	334 du	43	24	23	90
	Retail	10,000 sf	1	1	1	3
106	Condominiums	190 du	25	14	13	52
107	Condominiums	130 du	17	9	9	35
	Retail	7,030 sf	1	1	1	3
108	Condominiums	420 du	54	30	28	112
109	Condominiums	220 du	28	16	15	59
110	Apartments	600 du	76	42	40	158
	Retail	30,000 sf	1	1	1	3
111	Condominiums	210 du	27	15	14	56
	Retail	9,000 sf	1	1	1	3
112	Condominiums	400 du	51	28	27	106
	Retail	20,000 sf	1	1	1	3
113	Condominiums	425 du	54	30	29	113
	Apartments	425 du	54	30	29	113
114	Wholesale Market	78,972 sf	2	1	1	4
115	Condominiums	420 du	54	30	28	112
	Retail	40,000 sf	1	1	1	3
116	Condominiums	272 du	35	19	18	72
	Retail	6,431 sf	1	1	1	3
	Restaurant	8,000 sf	1	1	1	3
117	Condominiums	622 du	79	44	41	164
118	Condominiums	186 du	24	13	13	50
	Retail	6,200 sf	1	1	1	3
119	Condominiums	102 du	13	8	7	28
120	Condominiums	96 du	13	7	7	27
	Retail	7,800 sf	1	1	1	3
121	Condominiums	159 du	21	12	11	44
	Restaurant	6,827 sf	1	1	1	3
122	Gratts Primary School	380 seats	0	0	0	0
		176 st	0	0	0	0
123	Condominiums	96 du	13	7	7	27
	Hotel	122 rooms	n/a	n/a	n/a	n/a
	Retail	15,000 sf	1	1	1	3
124	Wholesale	309,000 sf	8	4	4	16
125	Wholesale	182,000 sf	5	3	3	11
126	Condominiums	318 du	41	23	21	85

Table IV-20
Estimated Cumulative Student Generation

Related Project No.	Land Use	Size	Student Generation Rates (students/unit) [a, b]			Total Students
			Elementary School	Middle School	High School	
127	Condominiums	160 du	21	12	11	44
128	Condominiums	131 du	17	10	9	36
129	High-Rise Condominiums	96 du	13	7	7	27
	Hotel	122 rooms	n/a	n/a	n/a	n/a
	Restaurant/Retail	10,000 sf	1	1	1	3
130	Apartments	92 du	12	7	7	26
	Retail	24,250 sf	1	1	1	3
	Office	24,250 sf	1	1	1	3
131	Condominiums	353 du	45	25	24	94
	Retail	18,900 sf	1	1	1	3
	Restaurant	6,000 sf	1	1	1	3
132	Condominiums	150 du	19	11	10	40
133	Light Industry	3,204,887 sf	91	48	48	187
	Restaurant	1,450 sf	1	1	1	3
	Wholesale	23,468 sf	1	1	1	3
134	High-Rise Condominiums	777 du	99	54	52	205
	Specialty Retail	25,000 sf	1	1	1	3
		Total Related Projects	*4,781*	*2,683*	*2,567*	*10,031*
		Proposed Project (Net)	*17*	*9*	*9*	*35*
		Total Cumulative	***4,798***	***2,692***	***2,576***	***10,066***

Note: du = dwelling unit; sf = square feet; emp = employees; st = students; n/a = not available. Numbers in "Total" cells may not add precisely due to rounding.
All calculations are rounded up for a conservative analysis.
[a] *Based on the following student generation rates: 0.1958 elementary, 0.0933 middle and 0.1062 high school students per dwelling unit (single-family detached units); and 0.1266 elementary, 0.0692 middle and 0.059 high school students per dwelling unit (multi-family attached units). Los Angeles Unified School District, Residential Development School Fee Justification Study, February 25, 2008.*
[b] *Based on the following student generation rates: 0.0234 elementary, 0.0123 middle, and 0.0123 high school students per 1,000 square feet of retail/service space; 0.0366 elementary, 0.0193 middle, and 0.0192 high school students per 1,000 square feet of office space; 0.0318 elementary, 0.0168 middle, and 0.0167 high school students per 1,000 square feet of research and development space; 0.0282 elementary, 0.0149 middle, and 0.0148 high school students per 1,000 square feet of industrial/warehouse/manufacturing space; 0.0295 elementary, 0.0153 middle, and 0.0153 high school students per 1,000 square feet of hospital space; 0.0118 elementary, 0.0063 middle, and 0.0062 high school students per 1,000 square feet of hotel/motel space; and 0.0009 elementary, 0.0005 middle, and 0.0005 high school students per 1,000 square feet of parking structure space. Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, February 25, 2008.*
[c] *Calculation assumes "retail and services" generation rate.*
[d] *Calculation assumes "hospital" generation rate.*
[e] *Calculation assumes "office" generation rate.*
[f] *Uses the stricter generation rate of office space for entire project.*
[g] *Assumes one unit = 50 sf.*
Source (related projects): The Mobility Group, March 2009.
Source (table): Christopher A. Joseph & Associates, May 2009.

When considering cumulative school facility impacts, an evaluation would be conducted on a case-by-case basis in conjunction with the development proposals for each project. As mandated by State law, 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 impact on school facilities. As such, the applicants of the related

projects, in addition to the proposed Project, would be required to pay a school fee to the LAUSD to help reduce cumulative impacts that they may have on school services. Compliance with the provisions of SB 50 is deemed to provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, with the full payment of all applicable school fees, the proposed and related projects would reduce potential cumulative impacts to schools to less-than-significant levels. As such, no further analysis of this issue in an environmental impact report is necessary.

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 municipally owned and operated recreation and park facilities within the City. Per City standards, a half-mile radius is the standard service radius for neighborhood parks; a two-mile radius is the standard service radius for community parks. The LADRP has identified the following 20 parks and recreational centers located within a two-mile radius of the Project site: [109]

- 6th and Gladys Street Park, a 0.34 acre pocket park, located at 824 East 6th Street;
- Alpine Recreational Center, a 1.93 acre neighborhood park, located at 817 Yale Street;
- Alvarado Terrace Park, a 1.17 acre small park, located at 1341 South Bonnie Brae Street;
- Bellevue Recreation Center, a 9.05 acre neighborhood park, located at 826 Lucile Avenue;
- Beverly Park, a 0.32 acre pocket park, located at 1644-1648 Beverly Boulevard;
- City Hall Park, a 3.98 acre facility located at 200 North Spring Street;
- Echo Park, Lake, Outdoor Pool and Recreation Center, a 29.41 acre community park, located at 751 Echo Park Boulevard and 1632 Bellevue Avenue;
- Echo Deep Pool, a 2.08 acre recreation facility, located at 1419 Colton Street;
- Elysian Park, a 605.80 acre region park, located at 929 Academy Road;
- Everett Park, a 0.70 acre small park, located at Everett Street and Sunset Boulevard;
- Hope and Peace Park, a 0.54 acre pocket park, located at 843 South Bonne Brae Street;
- Lafayette Park and Recreation Center, a 9.67 acre neighborhood park, located at 2830 West 6th Street;
- Lake Street Community Center and Universal Access Playground, a 1.83 acre facility, located at 227 North Lake Street;
- Lilac Terrace Park, a 2.82 acre neighborhood park, located at 1253 Lilac Terrace;

[109] *City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Chapter 2.14: Recreation and Open Space, January 19, 1995, page 2.14-2.*

- MacArthur Park, Senior Citizen Center and Lake, a 31.15 acre community park, located at 2230 West 6th Street;
- Occidental Parkway, a 1.03 acre median park, located on Occidental Boulevard between 6th Street and Beverly Boulevard;
- Pershing Square, a 5.02 acre community park, located at 532 South Olive Street;
- Shatto Recreation Center, a 5.39 acre neighborhood park, located at 3191 West 4th Street;
- Silverlake Recreation Center, a 3.73 acre neighborhood park, located at 1850 West Silverlake Drive; and
- Toberman Recreation Center, a 2.73 acre neighborhood park, located at 1725 South Toberman Street.

The Public Recreation Plan, a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The standard ratio of neighborhood and community parks to population is four acres per 1,000 residents, within a one- to two-mile radius (for neighborhood and community parks, respectively). Currently, the Westlake Community Plan Area (CPA) provides 0.37 acres of neighborhood and community park acreage per 1,000 people, which equates to approximately 9.3 percent of the neighborhood and community parkland required under the City's minimum parkland-to-population ratio. Existing parks and recreational facilities are not adequately meeting the Project area's current demand for parks and recreational facilities. The Project site is located in a high density area of the City that is below the City's standard for neighborhood and community park acreage. The recreational facilities in this area with active recreational features are heavily used by residents and any additional patrons will greatly impact the existing facilities. According to the LADRP, any project that does not provide either the acreage, sufficient fees to purchase the acreage, or suitable improvements to existing facilities will have an impact on the parks and recreation system.[110]

As discussed in Response 12(a) above, the proposed Project is anticipated to result a net increase of approximately 438 residents, thereby generating additional demand for added parks, improved sites, and recreational facilities and programs in an area where the existing supply of such facilities is already inadequate.[111] As proposed, the Project would generate a need for approximately 1.75[112] acres (approximately 76,230 square feet) of public parkland to be provided in the Project area.

Consistent with the LADRP and in order to help alleviate the burden upon existing recreational and park facilities, the proposed Project would provide on-site open space per the Specific Plan with requested approval to provide 192 square feet less than as required., including a variety of residential recreational

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[110] *Shull, Michael A., Superintendent, City of Los Angeles Department of Recreation and Parks, written correspondence, CAJA staff, September 10, 2008.*

[111] *Ibid.*

[112] *438 residents * 4 acres/1,000 residents = 1.75 acres of public parkland*

amenities. The LAMC and Specific Plan provide minimum standards for the amount of "open space" that residential development projects should provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards. However, it should be noted that not all areas designated as open space in the LAMC or Specific Plan would be classified as park or recreational facilities under the City's Quimby and Parkland fee programs, the General Plan Framework Element, or the LADRP. Therefore, such open space should not be used as a basis to determine an environmental impact under CEQA with respect to parks and recreational facilities. Though the Project proposes a total of 15,958 square feet (0.37 acres) of total open space[113] under the Specific Plan (as discussed in Section II, Project Description, of this Initial Study), which would generally meet the amount of open space required for the proposed Project under the Specific Plan; however, an additional 1.57[114] acres of neighborhood and community park acreage would be necessary to meet City standards. Therefore, Project impacts on parks and recreational facilities would be potentially significant.

To alleviate the demand on City parks and recreational facilities, as authorized under the Quimby Act, the City of Los Angeles has established a local ordinance, LAMC Section 17.12 (Park and Recreation Site Acquisition and Development Provisions), which requires land dedication or payment of fees for park or recreational purposes for projects involving residential subdivisions. The Quimby Act allows California municipalities to require developers of new residential subdivisions to dedicate parkland or to pay fees in lieu of parkland dedication. In subdivisions containing more than 50 dwelling units, developers may dedicate parkland in lieu of paying fees (LAMC Section 17.12). Section 17.12.B of the LAMC would allow the City to require a dedication of up to 32 percent[115] of the Project area for park and recreation purposes, equivalent to approximately a third of an acre.[116] The purpose for the collected Quimby fees is to acquire necessary land and/or develop new neighborhood and community parks or recreation facilities, which would reasonably serve the proposed Project. Revenues generated through the Quimby Act cannot be used for the operation or maintenance of park facilities.

Furthermore, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of $200 per dwelling unit on all construction of new and modification of existing dwelling units to be paid to the Department of Building and Safety. These Parkland fees are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. If a developer has already paid Quimby Act fees, as described under Section 17.12, or has dedicated in lieu parkland or recreational facilities, the Parkland fees required may be reduced in the form of a credit in the amount of fees already paid.

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[113] *As discussed in Section II, Project Description, of this Initial Study, common open space provided with the Project would include a front and rear yard, main and north terrace, lobby, pool, recreation room, and gymnasium.*

[114] *.37 acres (provided via open space) – 1.94 acres required per the Public Recreation Plan = -1.57 acres.*

[115] *For projects which may or will be developed with a net density of 100 units per acre or less, 32 percent of the gross subdivision area may be required to be dedicated for parks and recreational purposes.*

[116] *Shull, Michael A., Superintendent, City of Los Angeles Department of Recreation and Parks, written correspondence, CAJA staff, September 10, 2008.*

According to the analysis above, the proposed Project would generate an increase in the demand for parks and recreational facilities in the Project area. In addition, the proposed Project would further strain parks and create additional demand, which would require improvements to existing parks and recreational facilities. While the LADRP is currently investigating opportunities for parkland acquisition in the Downtown area, the LADRP does not have specific plans for the construction or expansion of parks and recreational facilities within a two mile radius of the Project site.[117] Since there are no future plans to expand and/or create additional park and recreational facilities that serve the Project site, the payment of Quimby and Parkland fees would assist in funding capital improvement projects, upgrades to existing recreational facilities, and acquisition and development of new park and recreation facilities around the Project site. Additionally, the construction of on-site amenities and consultation with LADRP staff in the Project's early design stages would help offset any potential impacts. Thus, through compliance with applicable local and state regulations as described above and identified in Mitigation Measure 13-4 below, the proposed Project's potential impacts on parks and recreational facilities to a less than significant.

Mitigation Measure

13-4 Pursuant to mandatory regulatory compliance the Project Applicant shall abide by the following:

1) Los Angeles Municipal Code Section 17.12 (Park and Recreation Site Acquisition and Development Provisions) and pay applicable Quimby Fees.

2) Los Angeles Municipal Code Section 21.10.3(a)(1) (Dwelling Unit Construction Tax) and pay applicable Parkland Fees.

Cumulative Impacts

Less Than Significant Impact. The Project site and related project sites are located in an urbanized area, where the current parkland to residence ratio is below the standard set by the LADPR. Development of the proposed Project in conjunction with the 134 related projects identified in Section II, Project Description, of this Initial Study would further increase demand for parks in the Project area. While employees generated by the commercial projects would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities, the increase in population by the related residential projects would increase the demand for parks and further impact the shortage of park/recreational space in the Westlake area. Without proper mitigation, the construction of the proposed Project and related projects would further reduce the LADPR's ability to adequately serve the surrounding community, and a potentially significant impact would occur. Future impacts on park facilities would be partially mitigated through the collection of park fees on new development and the provision of parkland; however, existing deficiencies would not be addressed by these fees. Therefore,

[117] *Shull, Michael A., Superintendent, City of Los Angeles Department of Recreation and Parks, written correspondence, CAJA staff, September 10, 2008.*

cumulative impacts on parks would be significant. However, each of the residential related projects is expected to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Furthermore, the applicants of the related projects would be anticipated to implement mitigation measures requiring consultation with City staff early in the design stages and the subsequent development of additional recreational parks amenities within the related project sites. Therefore, with payment of the applicable Quimby and Parks and Recreation fees on a project-by-project basis, the cumulative park impacts related to parks and recreational facilities would be reduced to less-than-significant levels.

e) Other public facilities?

Less Than Significant With Mitigation. A significant impact may occur if a project generates a demand for other public facilities such as libraries and energy supply facilities and distribution infrastructure (Appendix F of the State CEQA Guidelines discussion of Energy Conservation Measures) that exceeds the capacity available.

Libraries

The City of Los Angeles Public Library (LAPL) provides library services throughout the City of Los Angeles including: the Central Library, eight regional branch libraries, 63 community branches,[118] and four bookmobile units.[119] According to the Los Angeles CEQA Thresholds Guide (2006), approximately 6 million books and other materials comprise the LAPL collection, of which 2.2 million are located in the Central Library. According to the Citywide General Plan Framework Draft EIR, libraries in the City of Los Angeles serve the City by mandating certain facility sizes based on service population and have a maximum service radius of two miles.[120]

The Project site would be served by the Los Angeles Public Library's (LAPL) Echo Park Branch Library (Library), located at 1410 West Temple Street. The Library is a 12,500-square-foot facility with an undeveloped 5,000-square-foot basement and includes a collection size of 39,241 volumes. Currently, the Library has a total of 10 staff positions and serves the residential and retail/commercial community six days and four nights a week.[121] It presently has resources for children, teens, adults, and Spanish speakers. The Echo Park Branch Library provides free wireless internet access and, like every other branch of the LAPL, this Library offers free use of computer workstations that provide access to the LAPL's information network. These workstations also provide internet access, the ability to search the LAPL online catalog, subscription databases, word processing and language learning tools, access to an

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[118] *Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2007-2010, page 22.*

[119] *Los Angeles CEQA Thresholds Guide, 2006.*

[120] *City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Figure K-1, page 2.1 3-8, January 1995.*

[121] *Berns, Rona, Library Facilities Division, Los Angeles Public Library (LAPL), written correspondence, CAJA staff, August 19, 2008.*

historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.[122]

The Los Angeles Public Library Branch Facilities Plan (Plan), adopted in 1988, set standards for site selection of libraries and identified a list of projects in which existing branch libraries are to be renovated or new facilities constructed in order to bring library resources to the residents of the City of Los Angeles in accordance with the standards in the Plan.[123] The Board of Library Commissioners approved a new Plan on February 8, 2007. The Plan includes Criteria for New Libraries, which recommends new size standards for the provision of LAPL facilities.[124] According to the current Plan, service criteria are based on floor area required to serve varying amounts of residential population. Current LAPL branch building size standards are presented in Table IV-21, City of Los Angeles Public Library Branch Building Size Standards.

Table IV-21
City of Los Angeles Public Library Branch Building Size Standards

Population Served	Size of Facility (sq. ft.)
Under 45,000	12,500
Above 45,000	14,500
Regional Branch	up to 20,000

Note: For a community with population above 90,000, an additional library branch should be considered for the area.
Source: Berns, Rona, Library Facilities Division, Los Angeles Public Library (LAPL), written correspondence, CAJA staff, August 19, 2008; Los Angeles Public Library, Branch Facilities Plan, Criteria for New Libraries, website: http://www.lapl.org/about/Branch_Facilities_Criteria.pdf, August 28, 2008.

According to the LAPL, the Echo Park Branch Library has a service population of 53,764 people, based on the 2000 United States Census. Per the City Planning Department's estimation, the service population was 56,992 people and is anticipated to reach 59,321 people by 2010.[125] Development of the proposed project would increase the demand for library services by increasing the permanent residential population in the area. Currently, the Library does not meet the current demand for library services.[126]

Additionally, the City of Los Angeles General Plan Framework EIR sets forth a calculation of 0.5 square feet of facility space per resident and two volumes of permanent collection per resident to determine

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[122] *Los Angeles Public Library, Branch Libraries, Echo Park Branch Library, website: http://www.lapl.org/branches/Branch.php?bID=8, August 27, 2008.*

[123] *Los Angeles Public Library: Summary of Branch Facilities Plan Revision, Background, website: http://www.lapl.org/about/planning_overview.html, August 28, 2008.*

[124] *Berns, Rona, Library Facilities Division, Los Angeles Public Library (LAPL), written correspondence, CAJA staff, August 19, 2008.*

[125] *Berns, Rona, Library Facilities Division, Los Angeles Public Library (LAPL), written correspondence, CAJA staff, August 19, 2008.*

[126] *Ibid.*

demand for library facilities.[127] As discussed in Question 12(a) (Population and Housing), the proposed Project would increase the residential population in the Project area by approximately net 438 individuals. This increase in on-site population of approximately 438 residents would require an additional 219 square feet of library space (438 persons x 0.5 square feet) and 876 volumes of permanent collection (438 persons x 2 volumes each of permanent collections) to meet the State standards and the citywide standards set by the LAPL.

As discussed above, the Echo Park Branch Library does not meet the branch building size criteria established by the Los Angeles Public Library Branch Facilities Plan or the current demand for library services. Though the Plan includes plans to renovate the Library and add public space by building out the basement, there are currently no funds available for this development plan.[128] Any increase in the demand for library facilities, including library materials, computers and information services, would result in a potentially significant impact on the Library. However, with implementation of Mitigation Measure 13-1, significant impacts to library services would be reduced to a less-than-significant level, by generating funds for books, computers and other library materials.[129]

Mitigation Measure

13-5 The Project Applicant shall pay a mitigation fee of $200 per capita or $87,600,[130] based upon projected residential population generated as a result of the buildout of the Project.

Cumulative Impacts

Less Than Significant Impact. Implementation of the proposed Project in combination with the related projects identified in Section II, Project Description, of this Initial Study would further increase the demand for libraries and energy supply facilities and distribution infrastructure in the Project area.

Libraries

Specifically, there would be increased demands for additional LAPL staffing, materials, and facilities over time. This need would be funded via existing mechanisms (i.e., property taxes, government funding, mitigation fees) to which the applicants of the proposed Project and related projects would be required to contribute.

Only those related projects in the City of Los Angeles that would patronize the same library as the proposed Project will be analyzed in the cumulative discussion. Of the 134 related projects, only 103

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[127] *City of Los Angeles Citywide General Plan Framework EIR, Section 2.13 Public Libraries, January 1995.*

[128] *Berns, Rona, Library Facilities Division, Los Angeles Public Library (LAPL), written correspondence, CAJA staff, August 19, 2008.*

[129] *Berns, Rona, Library Facilities Division, Los Angeles Public Library (LAPL), written correspondence, CAJA staff, August 19, 2008.*

[130] *[438 net residents x $200 per person] = $87,600.*

would provide residential uses. Based on a two-mile library services area, 95 of these residential related projects (Related Project Nos. 2-3, 6-16, 19, 21, 23-26, 28-30, 32, 34-36, 38, 40-42, 46-54, 57, 59-61, 64-72, 74-76, 78-80, 83-84, 86-91, 93-95, 98-101, 104-113, 115-121, 123, 126, 129, 131, and 134) would be expected to utilize the same library that would serve the proposed Project (i.e., the Echo Park Branch Library) and would generate an increase of approximately 94,261 new residents to the Project area. As shown in Table IV-22, Estimated Cumulative Library Demand, the related projects served by the Echo Park Branch Library would also generate a demand for approximately 48,544.5 square feet of library facility space and approximately 188,522 library volumes.

Typically, projects that generate employees and/or students are not expected to increase library demand as students and employees usually do not have long periods of time during their work or school days to visit library facilities and are more likely to use libraries near their homes during non-work or non-school hours. Therefore, the non-residential related projects and the non-residential portions of the related projects listed in Table IV-22 below have been excluded from this cumulative analysis.

If one assumes that the Echo Park Branch Library would primarily service most of the related projects within the City of Los Angeles, the cumulative increase of 94,261 persons would increase the library service population from approximately 53,764 persons (based on 2000 U.S. Census) to approximately 148,025 persons, which represents an approximately 75 percent increase over the current library service population. Because the Westlake community already exceeds a 45,000-person recommended service population for a library of its size, the proposed Project and related projects' cumulative 75 percent increase in library service population size may demand a new or expanded library facility. Nonetheless, the proposed Project's net increase of approximately 438 residents represents only approximately 0.5 percent of the 94,261-person cumulative increase in library service population. Based on the proposed Project's minimal contribution to the increase in cumulative library demand, the proposed Project would not substantially contribute to a cumulative impact with respect to library services and cumulative library impacts would be less than significant.

Table IV-22
Estimated Cumulative Service Population for the Echo Park Branch Library

Related Project No.	Land Use	Size (du)	Residents[a]	Library Space Demand (sf)[b]	Library Volume Demand[b]
2	Artist-in-lofts	30	96	48	192
3	Apartments	87	276	138	552
6	Condominiums	105	333	166.5	666
7	Apartments	21	67	33.5	134
8	Condominiums	460	1,459	729.5	2,918
9	Apartments	102	324	162	648
10	Apartments	110	349	147.5	698
11	Apartments	600 du	1,902	951	3,804
12	Affordable Apartments	75	238	119	476
13	Office Condominiums	135	428	214	856

Table IV-22
Estimated Cumulative Service Population for the Echo Park Branch Library

Related Project No.	Land Use	Size (du)	Residents[a]	Library Space Demand (sf)[b]	Library Volume Demand[b]
	Live/Work Condominiums	402	1,275	637.5	2,550
14	Apartments	261	828	414	1,656
15	Condominiums	629	1,994	997	3,988
16	Condominiums	54	172	86	344
19	Apartments	65	207	103.5	414
21	Apartments	84	267	133.5	534
23	Apartments	210	666	333	1,332
24	Condominiums	311	986	493	1,972
25	Apartments	725	2,299	1,149.5	4,598
26	Apartments	70	222	111	444
28	Condo Hotel	112	356	178	712
	Condominiums	165	524	262	1,048
29	Condominiums	875	2,774	1,387	5,548
30	Loft Apartments	209	663	331.5	1,326
32	Residential Lofts	n/a	n/a	n/a	n/a
34	High-Rise Condominiums	132	419	103.5	838
	Condominiums	73	232	133.5	464
	Apartments	46	146	333	292
35	Apartments	300	951	493	1,902
36	Loft Apartments	300	951	1,149.5	1,902
38	Apartments	124	394	111	788
40	Apartments	444	1,408	178	2,816
41	Condominiums	130	413	262	826
	Apartments	250	793	1,387	1,586
42	Loft Apartments	157	498	331.5	996
46	Apartments	280	888	103.5	1,776
47	Live/Work Lofts	91	289	133.5	578
48	Condominiums	80	254	333	508
	Apartments	299	948	493	1,896
49	Lofts	82	260	1,149.5	520
50	Congregate Care Facility	200	634	111	1,268
51	Apartments	20	64	178	128
	Condominiums	565	1,792	262	3,584
52	Live/Work Condominiums	190	603	1,387	1,206
53	Condominiums	223	707	331.5	1,414
54	Condominiums	93	295	103.5	590
57	Condominiums	55	175	133.5	350
59	Apartments	800	2,536	333	5,072
60	Condominiums	836	2,651	493	5,302
61	Condominiums	118	375	1,149.5	750
64	Condominiums	39	124	111	248
65	Live/Work Lofts	78	248	178	496

Table IV-22
Estimated Cumulative Service Population for the Echo Park Branch Library

Related Project No.	Land Use	Size (du)	Residents[a]	Library Space Demand (sf)[b]	Library Volume Demand[b]
66	Condominiums	247	783	262	1,566
67	Condominiums	939	2,977	1,387	5,954
68	Apartments	363	1,151	331.5	2,302
69	Condominiums	351	1,113	103.5	2,226
70	Condominiums	128	406	133.5	812
71	Condominiums	225	714	333	1,428
72	Condominiums	311	986	493	1,972
74	Condominiums	300	951	1,149.5	1,902
75	Condominiums	172	546	111	1,092
76	Condominiums	130	413	206.5	826
78	Condominiums	84	267	133.5	534
79	Condominiums	570	1,807	903.5	3,614
	Apartments	280	888	444	1,776
80	Apartments (Ph 1)	90	286	143	572
	Apartments (Ph 2)	82	260	130	520
83	Condominiums	900	2,853	1,426.5	5,706
84	Apartments	74	235	117.5	470
86	Apartments	204	647	323.5	1,294
87	Live/Work Condominiums	132	419	209.5	838
88	Condominiums	330	1,047	523.5	2,094
89	Condominiums	240	761	380.5	1,522
90	Condominiums	222	704	352	1,408
91	Condominiums	198	628	314	1,256
93	Condominiums	331	1,050	525	2,100
94	Condominiums	1,648	5,225	2,612.5	10,450
	Apartments	412	1,307	653.5	2,614
95	Condominiums	300	951	475.5	1,902
98	Condominiums	168	533	266.5	1,066
99	Condominiums	250	793	396.5	1,586
100	Condominiums	190	603	301.5	1,206
101	Condominiums	550	1,744	872	3,488
104	Condominiums	407	1,291	645.5	2,582
105	Condominiums	334	1,059	529.5	2,118
106	Condominiums	190	603	301.5	1,206
107	Condominiums	130	413	206.5	826
108	Condominiums	420	1,332	666	2,664
109	Condominiums	220	698	349	1,396
110	Apartments	600	1,902	951	3,804
111	Condominiums	210	666	333	1,332
112	Condominiums	400	1,268	634	2,536
113	Condominiums	425	1,348	674	2,696
	Apartments	425	1,348	674	2,696
115	Condominiums	420	1,332	666	2,664
116	Condominiums	272	863	431.5	1,726
117	Condominiums	622	1,972	986	3,944

Table IV-22
Estimated Cumulative Service Population for the Echo Park Branch Library

Related Project No.	Land Use	Size (du)	Residents[a]	Library Space Demand (sf)[b]	Library Volume Demand[b]
118	Condominiums	186	590	295	1,180
119	Condominiums	102	324	171	648
120	Condominiums	96	305	152.5	610
121	Condominiums	159	505	252.5	1,010
123	Condominiums	96	305	152.5	610
126	Condominiums	318	1,009	504.5	2,018
129	High-Rise Condominiums	96	305	152.5	610
131	Condominiums	353	1,120	560	2,240
134	High-Rise Condominiums	777	2,464	1,232	4,928
	Related Projects Total		*93,823*	*48,325.5*	*187,646*
	Proposed Project Total (net)		*438*	*219*	*876*
	Cumulative Total (Related Projects Total + Proposed Project Total)		***94,261***	***48,544.5***	***188,522***

Notes: du = dwelling units, sf = square feet, st = students. Totals may not equal due to rounding.

[a] *Calculations assume 3.17 persons per multi-family unit and 4.64 persons per single-family unit, which were the average household sizes in the Wilshire CPA in 2008. (City of Los Angeles Department of City Planning, City of Los Angeles Population & Housing Estimates (2006), Summary Data by Community Plan Area: Westlake Community Plan, website: http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=Wlk&sgo=ct&rpt=PnH&yrx=08, May 20, 2009.)*

[b] *Demand calculations based on State of California library standards of 0.5 square feet of library facility per capita and two library volumes per capita. (City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, pages 2.13-1 & 2.13-2, January 1995.)*

Source (Related Projects): The Mobility Group, March 2009.
Source (Table): Christopher A. Joseph & Associates, May 2009.

14. 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 includes substantial population growth which could generate a demand for parks or recreational facilities that exceed the capacity of existing parks or recreational facilities and causes premature deterioration of the facilities.

As discussed in Response 13(d), the Project site is located in a high-density area that is currently experiencing a deficiency in the amount of parkland acreage per capita. While the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 people, the Westlake CPA, which includes the Project site, provides only 0.37 acres of neighborhood and community park acreage per 1,000 people, or approximately 9.3 percent of the City's standard. According to the Los Angeles

Department of Recreation and Parks (LADRP), the facilities in this area with active recreational features are heavily used by residents and any additional patrons would greatly impact the existing facilities.[131] As the proposed Project would be anticipated to result in a net increase of residents on site, development of the proposed Project would intensify the usage of the existing park and recreational facilities and generate additional demand for added parks, improved sites, and recreational facilities and programs in the area,[132] creating a potentially significant impact on existing parks and recreational facilities.

The proposed Project would provide a total of 15,958 square feet of common open space for Project residents under the Specific Plan, including a variety of recreational amenities, which would help to alleviate Project impacts on existing parks and recreational facilities. As discussed in Response 13(d), the amount of open space to be provided with the proposed Project would be generally consistent with Specific Plan requirements.

Similar to the discussion under Response 13(d) above, the Project Applicant would be required to pay Quimby fees to the City for the purpose of acquiring additional parkland (and recreational facilities) in the Project area, and/or provide adequate parkland within the Project site, as determined by the City of Los Angeles, which would serve to alleviate the demand for parks and recreational facilities. Therefore, Project impacts on existing neighborhood and regional parks and other recreational facilities would be reduced to a less-than-significant level and no additional mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As discussed in Response 13(d), the proposed Project would provide on-site open space and a variety of residential recreational amenities. However, as analyzed throughout this Initial Study, the construction of these on-site recreational areas would not result in an adverse effect on the physical environment. Though the Project's occupants are anticipated to increase demand for parks and recreational facilities in an area with an already insufficient supply to meet current standards and demand, as noted in Response 13(d), the Project would not involve the construction or expansion of off-site public recreational facilities and, as a result, no additional physical effects on the environment would be anticipated.

Acquisition and development of park and recreational sites and facilities, as well as maintenance of public parks and public recreational facilities in Los Angeles is funded largely through the City general fund and

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[131] *Shull, Michael A., Superintendent, City of Los Angeles Department of Recreation and Parks, written correspondence, CAJA staff, September 10, 2008.*

[132] *Shull, Michael A., Superintendent, City of Los Angeles Department of Recreation and Parks, written correspondence, CAJA staff, September 10, 2008.*

through Quimby and other park fees for new development. As discussed in Response 13(d), Project-related impacts associated with the use and maintenance of park and recreation facilities would be mitigated to less-than-significant levels through the payment of all applicable Quimby fees. Therefore, the impact would be less than significant. No mitigation measures would be required and no further analysis of this issue in an environmental impact report is necessary.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed Project in conjunction with the 134 related projects identified in Section II, Project Description, of this Initial Study, would result in an increase in permanent residents residing in the Project area and further increase demand for park and recreational facilities in the Project area. The increase in residential population by any related projects in the vicinity of the Project site would, in the absence of mitigation, lower the City's existing parkland to population ratio, which is currently below the preferred standard in the Westlake area. Employees generated by the commercial projects would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities.

Future impacts on park facilities would be partially mitigated through the collection of park fees on new development and the provision of parkland. However, existing deficiencies would not be addressed by these fees. Therefore, cumulative impacts on parks would be potentially significant. In accordance with State CEQA Guidelines Section 15130(a)(3), however, the proposed Project's contribution to the cumulative impact would be rendered less than cumulatively considerable through adherence to the Impacts by any residential related projects could be reduced through adherence to the Quimby Act, conditions of approval, and environmental review procedures. Adherence to the requirements would constitute implementation or funding of the proposed Project's fair share of measures designed to alleviate the cumulative impact. Any new or expansion of an existing recreational facility proposed by the related projects would be developed in accordance with all City requirements, thereby reducing potential adverse physical effect on the environment to less-than-significant levels. Therefore, cumulative impacts to park and recreation services would be less than significant and no mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

15. TRANSPORTATION/TRAFFIC

The following analysis is based on the Beverly and Lucas Project Traffic Study (Traffic Study) prepared by the Mobility Group on March 6, 2009. The Los Angeles Department of Transportation (LADOT) submitted a letter on May 27, 2009 stating they had reviewed the Project Traffic Study and it adequately evaluated Project related traffic impacts on the surrounding community. A copy of the Traffic Study with the modeling data results and the LADOT letter are included in Appendix I, Traffic Data, to this Initial Study.

a) Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number or vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

Less Than Significant Impact. A significant impact would occur if the proposed Project would generate traffic at a study intersection that would exceed City of Los Angeles Department of Transportation (LADOT) standards. According to LADOT policy, a significant project impact would occur when the Critical Movement Analysis value (volume to capacity ratio) increases by 0.010 or more when the final Level of Service (LOS) at a given study intersection is E or F, by 0.020 or more when the final LOS is D, or by 0.040 or more when the final LOS is C. Potential impacts of the Project have been evaluated in accordance with the assumptions, methodology, and procedures approved by the LADOT.

The Traffic Study includes an analysis of existing traffic conditions (2008) and future traffic conditions (2011, expected completion of the proposed Project) before and after completion of the proposed Project, in the AM and PM peak hours at intersections adjacent to or in proximity to the Project site that are expected to potentially experience the most direct impacts due to traffic generated by the proposed Project. Existing traffic conditions provide the foundation for the assessment of future traffic conditions. The existing conditions analysis includes a description of key area streets and highways, traffic volumes, and operating conditions. The following six study intersections were identified; all study intersections are signalized and currently operate at LOS C or better during AM and PM peak hours.

1. Glendale Boulevard and Lucas Avenue and Second Street
2. Lucas Avenue and Third Street
3. Witmer Street and Third Street
4. Beverly Boulevard and Loma Drive
5. Beaudry Avenue and SR-110 2nd Street SB Off-Ramp
6. Beaudry Avenue and 2nd Street

Future traffic growth and intersection operating conditions are forecast as a result of ambient growth (i.e., regional growth added at one percent per year) and related projects in the vicinity of the Project site by year 2011. As shown in Table IV-23, Future Traffic Conditions With and Without The Project, the Traffic Study concludes that the future conditions with the addition of the Project traffic would cause small increases in the volume to capacity ratios at the study intersections in AM or PM peak hours. These increases are less than the thresholds (as shown above) and would not cause a significant impact to occur.

Table IV-23
Future Traffic Conditions With and Without Project

No.	Intersection	Peak Hour	Without Project		With Project		
			V/C	LOS	V/C	LOS	Impact
1	Glendale Boulevard and Lucas Avenue and Second 2nd Street	AM	0.888	D	0.899	D	0.011
		PM	0.893	D	0.895	D	+0.002

Table IV-23
Future Traffic Conditions With and Without Project

No.	Intersection	Peak Hour	Without Project		With Project		
			V/C	LOS	V/C	LOS	Impact
2	Lucas Avenue and Third Street	AM	0.945	E	0.946	E	+0.001
		PM	0.962	E	0.969	E	+0.007
3	Witmer Street and Third Street	AM	0.451	A	0.451	A	+0.000
		PM	0.612	B	0.613	B	+0.001
4	Beverly Boulevard and Loma Drive	AM	0.458	A	0.461	A	+0.003
		PM	0.466	A	0.468	A	+0.002
5	Beaudry Avenue and SR-110 Second Street Southbound Off-Ramp	AM	0.736	C	0.736	C	+0.000
		PM	0.663	B	0.664	B	+0.001
6	Beaurdry Avenue and Second Street	AM	0.806	D	0.811	D	+0.005
		PM	0.883	D	0.885	D	+0.002

Source: Beverly + Lucas Project Traffic Study prepared by the Mobility Group on March 6, 2009. A copy of this study and modeling data results are included in Appendix I, Traffic Data, to this Initial Study.

The operation of the proposed Project is not anticipated to significantly impact any of the designated study intersections. It was also concluded that the intersections adjacent to the Project site would operate satisfactorily with the Project and that no improvements would be necessary. Therefore, impacts associated with existing traffic load and capacity of the street system would be less than significant and no mitigation measures are required.

In addition to the operational traffic generated by the proposed Project, construction traffic during the Project's construction phases would occur. Construction activities are considered temporary, not continuous, and short-term. Construction activities at the 1.26-acre Project site are expected to begin in late 2009 and would occur over the course of approximately 16 months, with full Project buildout by 2011. The demolition phase would occur over an approximately two-month period, the grading and excavation phases would occur over an approximately four-month period, and actual construction of the Project would occur over an approximately 10-month period. Permits will be required for the demolition of existing buildings and the Project will be subject to conditions of the grading permit. During construction, more vehicle trips are expected to be generated during the grading and excavation phase than during other portions of the Project's construction activity. Impacts of construction traffic during the various construction phases of the Project would be a temporary lessening of the capacities of access streets and haul routes due to slower movements and larger turning radii of trucks.

Activity at construction projects is typically concentrated outside of the peak travel periods, with most workers usually arriving prior to 7:00 a.m. and departing the Project site between 3:00 p.m. and 4:00 p.m., thereby avoiding the generation of trips during the morning and afternoon peak hour periods consistent with LADOT recommendations.

Due to the small nature of the Project construction site, the phasing of the Project's development, and construction worker traffic at non-peak hours, construction traffic is not anticipated to adversely affect street operations. Thus, construction traffic impacts would be less than significant.

b) Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. A significant impact may occur if the proposed Project would exceed thresholds adopted by the County of Los Angeles Metropolitan Transit Authority (Metro). To address increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111. The Metro is responsible for implementing the CMP for Los Angeles County to monitor and regulate regional traffic growth and transportation improvement programs. The CMP designates a transportation network including all State highways and some arterials within Los Angeles County to be monitored by local jurisdictions. If the level of service standard deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan that is in conformance with the Los Angeles County CMP. The intent of the CMP is to provide information to decision makers to assist in the allocation of transportation funds through the State Transportation Improvement Program process.

The CMP requires that traffic studies be prepared to document impacts to all CMP freeway monitoring stations where a project would add 150 or more trips to the freeway, in either direction during either the AM or PM weekday peak hours. The Traffic Study determined that the maximum number of trips the proposed Project would add to any single freeway segment would be eight trips in any direction in either peak hour. Thus, it is concluded that the Project would not cause any significant impacts to the freeway system. Therefore, Project-related impacts to CMP freeway monitoring stations would be less than significant.

An analysis is also required at all CMP monitoring intersections where a project would add 50 or more peak hour trips. The Traffic Study estimated that the proposed Project would generate an additional 66 AM peak hour trips and 80 PM peak hour trips to what is currently generated at the Project site. Identified in the most recent CMP (2004) are four arterial monitoring stations: Sunset Boulevard & Alvarado Street, Wilshire Boulevard & Alvarado Street, Wilshire Boulevard & Western Avenue, and Western Avenue & 8th Street. All four of these monitoring stations are located outside of the immediate study area at some distance from the Project site; Project trips would be expected to disperse onto numerous roadways. The Traffic Study determined that no more than ten percent of Project trips would be expected to pass through any of these intersections at AM or PM peak hours. Therefore, Project-related impacts to CMP intersections would be less than significant.

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. A significant impact would occur if the proposed Project includes an aviation-related use and would result in safety risks associated with such use. The proposed Project does not include any aviation-related uses. Therefore, no impact would occur and further analysis of this issue is not warranted.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. A significant impact may occur if the proposed Project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. No hazardous design features or uses would be introduced under the proposed Project that would create significant hazards to the surrounding roadways. Therefore, impacts related to road design features would be less than significant.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the proposed Project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the project site or adjacent uses.

The proposed Project would provide adequate emergency access in conformance with City requirements. The Project Applicant is required to consult with the LAFD prior to Project construction, thereby further reducing any potential impacts related to emergency access and design alternatives for the Project. City and emergency services would be notified of any planned road closures or restrictions on any roadways, alternative emergency routes, and detours due to construction activities of the Project. In addition, the Project Applicant would work together with the Crime Prevention Unit of the Los Angeles Police Department (LAPD) for advice with respect to crime prevention features that may be incorporated into the design of the proposed Project during both construction and operational time periods. Therefore, impacts related to emergency access would be less than significant and no mitigation measures are warranted.

f) Would the project result in inadequate parking capacity?

No Impact. A significant impact may occur if the proposed Project would result in an inadequate parking capacity based on City Code requirements and City Planning Department Deputy Advisory Agency policies. The proposed Project would be developed under LAMC Section 12.22 A.25 and SB 1818, and would provide a total of 170 parking spaces in three levels of under-structure parking.

Under the City's operative parking standards (LAMC Section 12.21 A 4 the Project would be required to provide at least one parking space for each dwelling unit of less than three habitable rooms, 1.5 parking spaces for each dwelling unit of three habitable rooms, and two parking spaces for each dwelling unit of more than three habitable rooms. As the Project would provide 79 studio, 57 one-bedroom, and 17 two-bedroom dwelling units, 213 parking spaces would be required.

The City's SB 1818 ordinance (Ordinance No. 179681) requires Housing Development Projects, such as the proposed Project, to comply with whichever of the following options requires the least amount of parking, Parking Option 1, Parking Option 2, or applicable provisions of Section 12.21 A 4 of the LAMC.

Parking Option 1 of the SB1818 ordinance requires the Project Applicant to provide one on-site parking space for each studio or one-bedroom dwelling unit, two on-site parking spaces for each two- or three-bedroom dwelling unit, and 2.5 on-site parking spaces for each dwelling units of four or more bedrooms. As previously discussed, the Project would provide 79 studio, 57 one-bedroom, and 17 two-bedroom dwelling units. Therefore, under these requirements, a total of 170 parking spaces would be required, 17 (8 provided) of which may be tandem spaces, three van-accessible spaces and three handicap accessible spaces.

Required parking for restricted affordable units under Parking Option 2 may be reduced to one parking space per restricted affordable unit with the following exceptions: 0.5 parking spaces must be provided for each dwelling unit restricted to Low and Very Low Income units for senior citizens or disabled persons and 0.25 parking spaces must be provided for each restricted affordable unit in a residential hotel. Additionally, up to 40 percent of the parking provided for the restricted affordable units may be provided by compact stalls.

Accordingly, the proposed Project's 170 parking spaces would meet the SB 1818 parking requirements of Parking Option 1. As such, impacts related to parking would be less than significant and no mitigation measures are required.

g) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less Than Significant Impact. A significant impact may occur if the proposed Project would conflict with adopted polices or involve modification of existing alternative transportation facilities located on-site or off-site.

The proposed Project is located along West Beverly Boulevard which provides several bus routes, allowing residents to access the Project site via public transit from locations throughout the City and region. The Project area is currently served by five Metro (Los Angeles County Metropolitan Transportation Authority) and two DASH routes (the City of Los Angeles DASH service). The public transportation routes in the Project area are listed in Section II, Project Description, of this Initial Study.

The Traffic Study analyzed the transit system serving the Project area to determine if the capacity would be substantially exceeded with implementation of the proposed Project. Project trip generation was estimated for the daily AM and PM peak hour periods. The likely distribution of Project trips was identified based on the type of land uses in the Project, the likely origins and destinations of Project residents, and the characteristics of the street system in the area of the Project. Because of the Project's downtown location near transit, employment, and entertainment destinations, a number of Project trips might be expected to be walk or transit trips rather than vehicle trips. Transit trips that would be generated by the Project were estimated per CMP guidelines and requirements. The Traffic Study estimated there would be approximately 10 a.m. (2 inbound and 8 outbound) and 13 p.m. (8 inbound and 5 outbound) peak hour transit trips generated by the Project. Given the amount of transit service in the Project area, the Project trips would represent a very small proportion of the overall transit system

capacity. The maximum eight peak hour trips per direction would constitute about one percent of the peak hour capacity (727 persons/hour) of the bus lines adjacent to the Project site, and about 0.3 percent of the peak hour transit capacity (1,994 persons/hour) within one half mile of the Project site.

The Traffic Study concluded that the Project would not cause the capacity of the transit system to be substantially exceeded and therefore the Project would not create any significant impacts on the transit systems serving the Project area. Furthermore, implementation of the proposed Project is not anticipated to involve any permanent lane closures or otherwise impact public transit service. Moreover, the proposed Project would not conflict with adopted policies, plans, or programs that support alternative transportation. As such, impacts related to alternative transportation would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Questions 15(a) and 15(b), above, analyze the proposed Project's traffic impacts in combination with the traffic impacts of the 134 potential development projects identified in the study area. As discussed therein, the proposed Project would not have a significant impact with respect to any of the study intersections, street segments, or the CMP system. Therefore, cumulative traffic impacts would be less than significant.

Because impacts related to emergency access are generally site-specific, like the proposed Project, the Applicants of the related projects would be anticipated to consult individually with City departments (including but not limited to the LAFD and LAPD) and to implement any access recommendations provided. Therefore, the proposed Project would not contribute to a cumulative impact related to emergency access and cumulative emergency access impacts would be less than significant.

Implementation of the proposed Project is not anticipated to substantially exceed the capacity of the transit system or involve any permanent lane closures. Furthermore, the proposed Project would provide adequate parking that would meet City parking requirements for newly developed projects. As the proposed Project would not result in significant impacts to public transportation or parking, the proposed Project would not contribute to cumulative impacts to alternative transportation or parking, and such impacts would be less than significant.

16. UTILITIES AND SERVICE SYSTEMS

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

No Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. 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 National Pollutant Discharge Elimination System (NPDES) permit that ensures compliance with wastewater treatment and discharge requirements. The Los Angeles RWQCB (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the project area.

The Project site is not served by a private on site wastewater treatment system, but instead conveys wastewater via municipal sewage infrastructure maintained by the City of Los Angeles Department of Public Works (LADPW) Bureau of Sanitation Division to the Hyperion Treatment Plant (HTP) located in Playa del Rey, which provides preliminary, primary and secondary treatment processes. This treatment facility is a public facility and is therefore subject to the State's wastewater treatment requirements. The residential land use anticipated under the Project is not anticipated to generate sewer flows that would contain constituents that would jeopardize the ability of the HTP to operate within its established wastewater treatment requirements. As with all wastewater treated by HTP, wastewater from the Project would be treated according to the treatment requirements enforced by the LARWQCB. Therefore, no significant impact would occur and no mitigation measures are required. No further analysis of this issue in an environmental impact report is warranted.

Cumulative Impacts

No Impact. Similar to the proposed Project, each of the related projects identified in Section II, Project Description, of this Initial Study would convey wastewater via municipal sewage infrastructure maintained by the LADPW to the HTP, and would not be served by a private on site wastewater treatment system. As the treatment facility is a public facility, it is therefore subject to the State's wastewater treatment requirements. As with all wastewater treated by the HTP, wastewater from the Project and 134 related projects would be treated to the treatment requirements enforced by the LARWQCB. Therefore, no significant impact would occur and no mitigation measures are required.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. 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 the project site would be exceeded.

The Project site is currently served by existing water and wastewater utility lines. In the event that, during development, utility lines are found to be substandard or in deteriorated condition, the Project Applicant would be required to make necessary improvements to achieve adequate service, under City of Los Angeles Building and Safety Code and LADPW requirements. The construction of the Project would include all necessary on- and off-site sewer pipe improvements and connections to adequately link the Project to the existing City water and wastewater systems. The design of these connections would be developed by a registered engineer and approved by the LADPW Bureau of Engineering. Where any

utility line construction encroaches into public right-of-way, review and approval by the Los Angeles Department of Transportation (LADOT) would be required. The construction of water and wastewater infrastructure would be localized to the Project site and immediate vicinity. As discussed below, water and wastewater treatment demands generated by the Project are not expected to significantly impact existing facilities or result in the need to construct new water and wastewater treatment facilities.

Wastewater Treatment Facilities

Wastewater treatment services would be provided to the Project by the LADPW. Municipal sewage infrastructure maintained by the LADPW would convey wastewater to the HTP for treatment. As discussed in Response 12(a), Population and Housing, implementation of the proposed Project would result in the development of 153 multi-family dwelling units and approximately 481 permanent residents. For a conservative analysis, no deductions have been taken for existing uses, which would increase the amount of wastewater generated at the Project site. As shown in Table IV-24, Estimated Proposed Project Wastewater Generation, the proposed Project would generate approximately 15,880 gallons per day (gpd) or approximately 0.016 million gallons per day (mgd) of wastewater. The HTP has a design capacity to treat approximately 450 mgd and currently treats an average daily flow of approximately 362 mgd. This represents a remaining capacity of approximately 88 mgd of wastewater that can be treated at the HTP, which indicates that the HTP would have sufficient capacity to accommodate the proposed Project's approximate 0.016 mgd of wastewater generation.

Table IV-24
Estimated Proposed Project Wastewater Generation

Proposed Land Uses	Number (du)	Wastewater Generation Rate[b] (gpd/du)	Wastewater Generated (gpd)
Multi-Family Residences	153 (total)		
Studio units	79	80	6,320
One-bedroom units	57	120	6,840
Two-bedroom units	17	160	2,720
Total Proposed Project Wastewater Generation (Net)			***15,880***

Notes: du = dwelling unit
Source: Lorscheider, Brent, Acting Division Manager, Wastewater Engineering Services Division, City of Los Angeles Bureau of Sanitation, written correspondence, CAJA staff, August 6, 2008.

A letter from the Bureau of Sanitation dated August 6, 2008 (see Appendix A, Letters from Public Service and Utility Agencies, to the Initial Study) indicated that the Project site is served by an existing 8-inch sewer line on Beverly Boulevard, which feeds into an 30-inch line on First Street, continues into a 24-inch line, before discharging into a 36-inch line on Figueroa street.[133] As stated above, the HTP has a design capacity to treat approximately 450 mgd and currently treats an average daily flow of

[133] *Lorscheider, Brent, Acting Division Manager, Wastewater Engineering Services Division, City of Los Angeles Bureau of Sanitation, written correspondence, CAJA staff, August 6, 2008.*

approximately 362 mgd.[134] Therefore, the proposed Project's approximate 0.016 mgd of wastewater generation would be adequately served. Additionally, the Bureau of Sanitation indicated that the existing sewer system would likely accommodate the anticipated sewage flow of the proposed Project; however, the current flow levels in the 8-inch, 24-inch, 30-inch, and 36-inch lines cannot be determined at this time, as gauging is needed for these lines.[135] Therefore, the proposed Project's impact on wastewater treatment facilities and infrastructure would be less than significant.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) is responsible for providing water to the Project site. As previously stated, the proposed Project would involve the replacement of existing residential uses with a 153 multi-family residential development. For a conservative analysis no credit is being assumed for existing conditions. As shown in Table IV-25, Estimated Proposed Project Water Consumption, operation of the proposed Project would result in approximately 18,101 gpd (approximately 0.018 mgd) of water consumption.

Table IV-25
Estimated Proposed Project Water Consumption

Proposed Land Uses	Size (du)	Water Consumption Rate (gpd/du) [(1)]	Water Consumed (gpd)
Proposed			
Multi-Family Residences	153 (total)		
Studio units	79	96	6,794
One-bedroom units	57	142	8,094
Two-bedroom units	17	189	3,213
Total Proposed Project Water Consumption (Net)			***18,101***

Notes:
du = dwelling unit
(1) Water usage is calculated using 118% (for Residential) or 128% (for other uses) of standard wastewater rates to include outdoor water usage.
Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002; Christopher A. Joseph and Associates, July 2008.

LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in Sylmar, which treats City water prior to distribution throughout the LADWP's Central Water Service Area. The designed treatment capacity of the LAAFP is 600 million gallons per day (mgd) with an average plant flow of 450 mgd in non-summer months and 550 mgd during summer months. Therefore, the facility has between approximately 50 to 150 mgd of remaining capacity, depending on the season. The proposed Project's water consumption of approximately 0.018 mgd of water represents approximately 0.01 and

[134] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Major Activities, website: http://www.lacity.org/san/wastewater/factsfigures.htm, January 7, 2009.*

[135] *Lorscheider, Brent, Acting Division Manager, Wastewater Engineering Services Division, City of Los Angeles Bureau of Sanitation, written correspondence, CAJA staff, August 6, 2008.*

0.04 percent excess treatment capacity currently available at the LAAFP during non-summer and summer months respectively. Therefore, the proposed Project would have a less than significant impact with respect to water treatment facilities and no mitigation measures are warranted.

Cumulative Impacts

Wastewater Treatment Facilities and Existing Infrastructure

Less Than Significant Impact. Development of the proposed Project in combination with the 134 related projects identified in Section II, Project Description, of this Initial Study would further increase demands for sewer service in the LADWP's service area and could result in a decrease in the HTP's daily effluent capacity. As shown in Table IV-26, Estimated Cumulative Wastewater Generation, the proposed Project and the related projects would generate approximately 8,254,804 gpd (approximately 8.3 mgd) of wastewater.

Table IV-26
Estimated Cumulative Wastewater Generation

Related Project No.	Land Use	Size	Sewage Generation Rate (gpd/unit) [a]	Sewage Generated (gpd)
1	Community Building	32,000 sf	0.02 gal/sf/day	640
	Performing Arts	25,000 sf	0.02 gal/sf/day	500
	Plaza House	14,100 sf	0.02 gal/sf/day	282
	Educational Center & Museum	23,700 sf	0.02 gal/sf/day	474
2	Artist-in-lofts	30 du	160 gal/du/day	4,800
	Retail	5,000 sf	0.08 gal/sf/day	400
	Office	20,000 sf	0.15 gal/sf/day	3000
3	Apartments	87 du	160 gal/du/day	13,920
	Commercial	70,231 sf	0.08 gal/sf/day	5,618
4	Office	5,432 sf	0.15 gal/sf/day	815
	Uniform Sales Store	7,168 sf	0.08 gal/sf/day	573
5	Grocery	40,000 sf	0.08 gal/sf/day	3,200
	Retail	30,000 sf	0.08 gal/sf/day	2,400
	Community Facility	40,000 sf	0.02 gal/sf/day	800
6	Condominiums	105 du	160 gal/du/day	16,800
	Retail	4,500 sf	0.08 gal/sf/day	360
7	Apartments	21 du	160 gal/du/day	3,360
8	Condominiums	460 du	160 gal/du/day	73,600
9	Apartments	102 du	160 gal/du/day	16,320
	Retail	4,212 sf	0.08 gal/sf/day	337
10	Apartments	110 du	160 gal/du/day	17,600
11	Apartments	600 du	160 gal/du/day	96,000
	Retail	20,000 sf	0.08 gal/sf/day	1,600
12	Affordable Apartments	75 du	160 gal/du/day	12,000
13	Office Condominiums	135 du	160 gal/du/day	21,600
	Live/Work Condominiums	402 du	160 gal/du/day	64,320
14	Apartments	261 du	160 gal/du/day	41,760

Table IV-26
Estimated Cumulative Wastewater Generation

Related Project No.	Land Use	Size	Sewage Generation Rate (gpd/unit) [a]	Sewage Generated (gpd)
	Specialty Retail	6,398 sf	0.08 gal/sf/day	512
15	Condominiums	629 du	160 gal/du/day	10,0640
	Retail	27,000 sf	0.08 gal/sf/day	2160
16	Condominiums	54 du	160 gal/du/day	8,640
17	Office	880,000 sf	0.15 gal/sf/day	13,200
18	Auto Sales & Parking Lot	25,880 sf	0.02 gal/sf/day	518
19	Apartments	65 du	160 gal/du/day	10,400
20	Imageing Center, Pharmacy, Surgical Suites & Physician Offices	150,000 sf	0.02 gal/sf/day	3,000
21	Apartments	84 du	160 gal/du/day	13,440
22	Performing Arts High School	64 classrooms	8 gal/student/day	512
	Performing Arts Theater	1,600 seats	4 gal/seat/day	6,400
23	Apartments	210 du	160 gal/du/day	33,600
	Retail	10,966 sf	0.08 gal/sf/day	877
24	Condominiums	311 du	160 gal/du/day	49,760
	Retail	7,294 sf	0.08 gal/sf/day	584
25	Apartments	725 du	160 gal/du/day	116,000
	Retail	39,999 sf	0.08 gal/sf/day	3,199
26	Apartments	70 du	160 gal/du/day	11,200
27	U.S. District Courtrooms	41 courtrooms	n/a	n/a
	Judges Chambers	40 chambers	n/a	n/a
	Support Offices	n/a	n/a	n/a
	Circuit Satellite Library	n/a	n/a	n/a
	Parking	150 spaces	0.02 gal/sf/day	3
28	Hotel	80 rooms	130 gal/room/day	10,400
	Condo Hotel	112 du	130 gal/room/day	14,560
	Condominiums	165 du	160 gal/du/day	26,400
	Retail	7,500 sf	0.08 gal/sf/day	600
	Restaurant	13,000 sf	0.3 gal/sf/day	3,900
29	Condominiums	875 du	160 gal/du/day	140,000
	Retail	34,061 sf	0.08 gal/sf/day	2,725
	Restaurants	10,000 sf	0.3 gal/sf/day	3,000
30	Loft Apartments	209 du	160 gal/du/day	33,440
31	5-year Master Plan Project	n/a	n/a	n/a
32	Residential Lofts	n/a	n/a	n/a
	Retail	n/a	n/a	n/a
33	Office	25,500 sf	0.15 gal/sf/day	3,825
	Exam Facility	50 visitors	8 gal/visitor/day	400
	Conference Facility	350 visitors	8 gal/visitor/day	2,800
34	High-Rise Condominiums	132 du	160 gal/du/day	21,120
	Condominiums	73 du	160 gal/du/day	11,680
	Apartments	46 du	160 gal/du/day	7,360
	Retail	19,103 sf	0.08 gal/sf/day	1,528
35	Office	8,200,000 sf	0.15 gal/sf/day	1,230,000
	Hotel	750 rooms	130 gal/room/day	97,500

Table IV-26
Estimated Cumulative Wastewater Generation

Related Project No.	Land Use	Size	Sewage Generation Rate (gpd/unit) [a]	Sewage Generated (gpd)
	Apartments	300 du	160 gal/du/day	48,000
	Retail	250,000 sf	0.08 gal/sf/day	20,000
	Museum	70,000 sf	0.08 gal/sf/day	5,600
36	Loft Apartments	300 du	160 gal/du/day	48,000
37	Multi-Use Development[c]	596,000 sf	0.02 gal/sf/day	11,920
38	Apartments	124 du	160 gal/du/day	19,840
	Retail	12,500 sf	0.08 gal/sf/day	1,000
39	EOC/POC/FDC	433 emp	8 gal/emp/day	3,464
	Metro Jail	512 beds	75 gal/bed/day	38,400
	Occupational Health & Services Div. (OHSD)	30,000 sf	.02 gal/sf/day	600
	Fire Station #4	21 emp	8 gal/emp/day	168
40	Apartments	444 du	160 gal/du/day	71,040
	Retail	30,650 sf	0.08 gal/sf/day	2,452
41	Condominiums	130 du	160 gal/du/day	20,800
	Apartments	250 du	160 gal/du/day	40,000
	Supermarket	30,000 sf	0.08 gal/sf/day	2,400
	High Turnover Restaurant	150,000 sf	0.3 gal/sf/day	45,000
	Retail	200,000 sf	0.08 gal/sf/day	16,000
42	Loft Apartments	157 du	160 gal/du/day	25,120
43	Police Headquarters Facility (PHF)	2,400 emp	8 gal/emp/day	19,200
	Motor Transport Division (MTD)	56 emp	8 gal/emp/day	448
	Recreation Center[c]	60,000 sf	0.02 gal/sf/day	1,200
	Aiso St. Parking Facility	300 spaces	0.02 gal/sf/day	6
44	Restaurant	13,921 sf	0.3 gal/sf/day	4,176
	Retail	726 sf	0.08 gal/sf/day	58
	Pool/Event	726 sf	0.02 gal/sf/day	15
45	Elementary School	875 st	8 gal/student/day	7,000
46	Apartments	280 du	160 gal/du/day	44,800
	Retail	22,000 sf	0.08 gal/sf/day	1,760
47	Live/Work Lofts	91 du	160 gal/du/day	14,560
48	Condominiums	80 du	160 gal/du/day	12,800
	Apartments	299 du	160 gal/du/day	47,840
49	Lofts	82 du	160 gal/du/day	13,120
50	Congregate Care Facility	200 du	160 gal/du/day	32,000
51	Apartments	20 du	160 gal/du/day	3,200
	Office	32,670 sf	0.15 gal/sf/day	4,900
	Retail	37,600 sf	0.08 gal/sf/day	3,008
	Condominiums	565 du	160 gal/du/day	90,400
52	Live/Work Condominiums	190 du	160 gal/du/day	30,400
	Retail	5,540 sf	0.08 gal/sf/day	443
53	Condominiums	223 du	160 gal/du/day	35,680
	Cultural Center	7,000 sf	0.02 gal/sf/day	140
	Restaurant	15,000 sf	0.3 gal/sf/day	4,500
	Retail	22,008 sf	0.08 gal/sf/day	1,761

Table IV-26
Estimated Cumulative Wastewater Generation

Related Project No.	Land Use	Size	Sewage Generation Rate (gpd/unit) [a]	Sewage Generated (gpd)
54	Condominiums	93 du	160 gal/du/day	14,880
55	Restaurant	11,018 sf	0.3 gal/sf/day	3,305
	Retail	8,927 sf	0.08 gal/sf/day	714.16
	Health Club	5,066 sf	0.02 gal/sf/day	101
56	Hall of Justice	30 emp	8 gal/emp/day	240
	Parking Structure	1,000 spaces (50,000 sf)	0.02 gal/sf/day	20
57	Condominiums	55 du	160 gal/du/day	8,800
	Retail	28,000 sf	0.08 gal/sf/day	2,240
58	Entertainment	33,423 sf	0.02 gal/sf/day	668
59	Hotel	1,200 rooms	130 gal/room/day	15,6000
	Cinema	3,600 seats	4 gal/seat/day	14,400
	Theatre	7,000 seats	4 gal/seat/day	28,000
	Restaurants	345,000 sf	0.3 gal/sf/day	103,500
	Retail	498,000 sf	0.08 gal/sf/day	39,840
	Office	165,000 sf	0.15 gal/sf/day	24,750
	Apartments	800 du	160 gal/du/day	12,8000
60	Hotel	480 rooms	130 gal/room/day	62,400
	Condominiums	836 du	160 gal/du/day	133,760
	Office	988,225 sf	0.15 gal/sf/day	148,233
	Retail	46,000 sf	0.08 gal/sf/day	3,680
61	Condominiums	118 du	160 gal/du/day	18,880
	Retail	3,000 sf	0.08 gal/sf/day	240
62	Condominiums	273 du	160 gal/du/day	43,680
	Retail	18,000 sf	0.08 gal/sf/day	1440
63	Condominiums	464 du	160 gal/du/day	74,240
	Retail	25,000 sf	0.08 gal/sf/day	2,000
64	Condominiums	39 du	160 gal/du/day	6,240
65	Live/Work Lofts with Restaurant/Bar	78 du	0.3 gal/sf/day	23
66	Condominiums	247 du	160 gal/du/day	39,520
	Retail	10,675 sf	0.08 gal/sf/day	854
67	Condominiums	939 du	160 gal/du/day	150,240
	Retail/Restaurant	83,700 sf	0.3 gal/sf/day	25,110
68	Apartments	363 du	160 gal/du/day	58080
	Retail	7,740	0.08 gal/sf/day	619
69	Condominiums	351 du	160 gal/du/day	56,160
	Retail	125,000 sf	0.08 gal/sf/day	10,000
	Restaurant	125,000 sf	0.3 gal/sf/day	37,500
70	Condominiums	128 du	160 gal/du/day	20,480
	Retail	3,472 sf	0.08 gal/sf/day	278
	Restaurant	2,200 sf	0.3 gal/sf/day	660
71	Condominiums	225 du	160 gal/du/day	36,000
	Hotel	200 rooms	130 gal/room/day	26,000
	Retail	30,000 sf	.08 gal/sf/day	2,400
	Restaurant	32,000 sf	0.3 gal/sf/day	9,600
72	Condominiums	311 du	160 gal/du/day	49,760

Table IV-26
Estimated Cumulative Wastewater Generation

Related Project No.	Land Use	Size	Sewage Generation Rate (gpd/unit) [a]	Sewage Generated (gpd)
73	Bar/Lounge	8,770 sf	0.3 gal/sf/day	2,631
74	Condominiums	300 du	160 gal/du/day	48,000
75	Condominiums	172 du	160 gal/du/day	27,520
	Retail	6,850 sf	0.08 gal/sf/day	5,48
76	Condominiums	130 du	160 gal/du/day	20,800
	Retail	7,037 sf	0.08 gal/sf/day	562
77	Supermarket	17,000 sf	0.08 gal/sf/day	1,360
	Retail	4,200 sf	0.08 gal/sf/day	336
78	Condominiums	84 du	160 gal/du/day	13,440
	Bar	6,000 sf	0.3 gal/sf/day	1,800
79	Condominiums	570 du	160 gal/du/day	91,200
	Apartments	280 du	160 gal/du/day	44,800
	Retail	50,000 sf	0.08 gal/sf/day	4,000
80	Apartments (Ph 1)	90 du	160 gal/du/day	14,400
	Retail (Ph 1)	15,500 sf	0.08 gal/sf/day	1,240
	Apartments (Ph 2)	82 du	160 gal/du/day	13,120
	Retail (Ph 2)	17,300 sf	0.08 gal/sf/day	1,384
81	High School	1,206 st	8 gal/student/day	9,648
82	Gas Station with Canopy & Mini-Market (Reconstruct)	2,046 sf	0.02 gal/sf/day	41
	Gas Station with Canopy & Mini-Market (Demolish)	*2,044 sf*	*0.02 gal/sf/day*	-41
83	Condominiums	900 du	160 gal/du/day	14,4000
	Retail	19,000 sf	0.08 gal/sf/day	1,520
	Restaurant	19,200 sf	0.3 gal/sf/day	5,760
84	Apartments	74 du	160 gal/du/day	11,840
85	Condominiums	213 du	160 gal/du/day	34,080
	Retail	9,500 sf	0.08 gal/sf/day	760
86	Apartments	204 du	160 gal/du/day	32,640
	Retail	5,000 sf	0.08 gal/sf/day	400
87	Live/Work Condominiums	132 du	160 gal/du/day	21,120
88	Condominiums	330 du	160 gal/du/day	52,800
	Retail	2,800 sf	0.08 gal/sf/day	224
	Restaurant	9,200 sf	0.3 gal/sf/day	2,760
	Health Club	56,200 sf	0.02 gal/sf/day	1,124
89	Condominiums	240 du	160 gal/du/day	38,400
90	Condominiums	222 du	160 gal/du/day	35,520
91	Condominiums	198 du	160 gal/du/day	31,680
92	Office	960,000 sf	0.15 gal/sf/day	14,4000
	Retail	100,000 sf	0.08 gal/sf/day	8,000
93	Condominiums	331 du	160 gal/du/day	52,960
	Retail	10,000 sf	0.08 gal/sf/day	800
	Restaurant	5,985 sf	0.3 gal/sf/day	1,796
94	Condominiums	1,648 du	160 gal/du/day	263,680
	Apartments	412 du	160 gal/du/day	65920

Table IV-26
Estimated Cumulative Wastewater Generation

Related Project No.	Land Use	Size	Sewage Generation Rate (gpd/unit) [a]	Sewage Generated (gpd)
	County Office Building	681,000 sf	0.15 gal/sf/day	102,150
	Retail/Restaurant/ Supermarket/Healthclub	449,000 sf	0.3 gal/sf/day	134,700
	Hotel	275 rooms	130 gal/room/day	35,750
95	Condominiums	300 du	160 gal/du/day	48,000
	Retail	34,000 sf	0.08 gal/sf/day	2,720
96	Condominiums	118 du	160 gal/du/day	18,880
97	Condominiums	297 du	160 gal/du/day	47,520
98	Condominiums	168 du	160 gal/du/day	26,880
99	Condominiums	250 du	160 gal/du/day	40,000
	Retail	7,283 sf	0.08 gal/sf/day	583
100	Condominiums	190 du	160 gal/du/day	30,400
101	Condominiums	550 du	160 gal/du/day	88,000
102	Retail	100,000 sf	0.08 gal/sf/day	8,000
103	Office	930,000 sf	0.15 gal/sf/day	13,9500
104	Condominiums	407 du	160 gal/du/day	65,120
	Retail	7,472 sf	0.08 gal/sf/day	598
105	Condominiums	334 du	160 gal/du/day	53,440
	Retail	10,000 sf	0.08 gal/sf/day	800
106	Condominiums	190 du	160 gal/du/day	30,400
107	Condominiums	130 du	160 gal/du/day	20,800
	Retail	7,030 sf	0.08 gal/sf/day	562
108	Condominiums	420 du	160 gal/du/day	67,200
109	Condominiums	220 du	160 gal/du/day	35,200
110	Apartments	600 du	160 gal/du/day	96,000
	Retail	30,000 sf	0.08 gal/sf/day	2,400
111	Condominiums	210 du	160 gal/du/day	33,600
	Retail	9,000 sf	0.08 gal/sf/day	720
112	Condominiums	400 du	160 gal/du/day	64,000
	Retail	20,000 sf	0.08 gal/sf/day	1,600
113	Condominiums	425 du	160 gal/du/day	6,8000
	Apartments	425 du	160 gal/du/day	68000
114	Wholesale Market	78,972 sf	0.08 gal/sf/day	6,318
115	Condominiums	420 du	160 gal/du/day	67,200
	Retail	40,000 sf	0.08 gal/sf/day	3,200
116	Condominiums	272 du	160 gal/du/day	43,520
	Retail	6,431 sf	0.08 gal/sf/day	514
	Restaurant	8,000 sf	0.3 gal/sf/day	2,400
117	Condominiums	622 du	160 gal/du/day	99,520
118	Condominiums	186 du	160 gal/du/day	29,760
	Retail	6,200 sf	0.08 gal/sf/day	496
119	Condominiums	102 du	160 gal/du/day	16,320
120	Condominiums	96 du	160 gal/du/day	15,360
	Retail	7,800 sf	0.08 gal/sf/day	624
121	Condominiums	159 du	160 gal/du/day	25,440
	Restaurant	6,827 sf	0.3 gal/sf/day	2,048
122	Gratts Primary School	380 seats	8 gal/student/day	1,408

Table IV-26
Estimated Cumulative Wastewater Generation

Related Project No.	Land Use	Size	Sewage Generation Rate (gpd/unit) [a]	Sewage Generated (gpd)
		176 st	n/a	n/a
123	Condominiums	96 du	160 gal/du/day	15,360
	Hotel	122 rooms	130 gal/room/day	15,860
	Retail	15,000 sf	0.08 gal/sf/day	1,200
124	Wholesale	309,000 sf	0.08 gal/sf/day	24,720
125	Wholesale	182,000 sf	0.08 gal/sf/day	14,560
126	Condominiums	318 du	160 gal/du/day	50,880
127	Condominiums	160 du	160 gal/du/day	25,600
128	Condominiums	131 du	160 gal/du/day	20,960
129	High-Rise Condominiums	96 du	160 gal/du/day	15,360
	Hotel	122 rooms	130 gal/room/day	15,860
	Restaurant/Retail	10,000 sf	0.3 gal/sf/day	3,000
130	Apartments	92 du	160 gal/du/day	14,720
	Retail	24,250 sf	0.08 gal/sf/day	1,940
	Office	24,250 sf	0.15 gal/sf/day	36,378
131	Condominiums	353 du	160 gal/du/day	56,480
	Retail	18,900 sf	0.08 gal/sf/day	1,512
	Restaurant	6,000 sf	0.3 gal/sf/day	1,800
132	Condominiums	150 du	160 gal/du/day	24,000
133	Light Industry	3,204,887 sf	0.02 gal/sf/day	64,097
	Restaurant	1,450 sf	0.3 gal/sf/day	435
	Wholesale	23,468 sf	0.08 gal/sf/day	1,877
134	High-Rise Condominiums	777 du	160 gal/du/day	124,320
	Specialty Retail	25,000 sf	0.08 gal/sf/day	2,000
			Related Projects Total	*8,238,924*
			Proposed Project Total	*15,880*
			Cumulative Total	***8,254,804***

Notes: sf = square feet; gal = gallons; du = dwelling unit; gpd =- gallons per day.
[a] *Based on the wastewater generation rates provided by City of Los Angeles, Department of Public Works, Bureau of Engineering, March 2002.*
Source: Christopher A. Joseph & Associates, May 2009.

As discussed above, the HTP has a design capacity to treat 450 mgd and currently treats an average daily flow of 362 mgd. This represents a remaining capacity of 88 mgd of wastewater that can be treated at the HTP. The additional approximately 8.3 mgd generated by the proposed and related projects would represent approximately 9.4 percent of remaining treatment capacity currently available at the HTP. Similar to the proposed Project, related projects would be required to improve or replace substandard or deteriorated utility lines per City of Los Angeles Building and Safety Code and Department of Public Works requirements. Furthermore, similar to the proposed Project, each related project would be required to comply with City and State water conservation programs and the City's sewer allocation ordinance, which would not allow HTP treatment capacity to be exceeded. Therefore, cumulative impacts on wastewater service and infrastructure would be less than significant and no mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

Water Treatment Facilities and Existing Infrastructure

Less Than Significant Impact. Development of the proposed Project in conjunction with the related projects identified in Section II, Project Description, of this Initial Study would result in an increase in the demand for water service in LADWP's service area and would further increase the regional demand for water supplies. As shown in Table IV-27, Estimated Cumulative Water Consumption, the proposed Project and the related projects would consume approximately 9,971,279 gpd (approximately 10.0 mgd) of water.

Table IV-27
Estimated Cumulative Water Consumption Generation

Related Project No.	Land Use	Size	Water Consumption Rate (gpd/unit) [a]	Water Consumed (gpd)
1	Community Building	32,000 sf	0.03 gal/sf/day	960
	Performing Arts	25,000 sf	0.03 gal/sf/day	750
	Plaza House	14,100 sf	0.03 gal/sf/day	423
	Educational Center & Museum	23,700 sf	0.03 gal/sf/day	711
2	Artist-in-lofts	30 du	188.88 gal/du/day	5,664
	Retail	5,000 sf	0.1 gal/sf/day	500
	Office	20,000 sf	0.19 gal/sf/day	3,800
3	Apartments	87 du	188.88 gal/du/day	16,426
	Commercial	70,231 sf	0.1 gal/sf/day	7,023
4	Office	5,432 sf	0.19 gal/sf/day	1,032
	Uniform Sales Store	7,168 sf	0.1 gal/sf/day	717
5	Grocery	40,000 sf	0.1 gal/sf/day	4,000
	Retail	30,000 sf	0.1 gal/sf/day	3,000
	Community Facility	40,000 sf	0.03 gal/sf/day	1,200
6	Condominiums	105 du	188.88 gal/du/day	19,824
	Retail	4,500 sf	0.1 gal/sf/day	450
7	Apartments	21 du	188.88 gal/du/day	3,965
8	Condominiums	460 du	188.88 gal/du/day	86,848
9	Apartments	102 du	188.88 gal/du/day	19,258
	Retail	4,212 sf	0.1 gal/sf/day	421

Table IV-27
Estimated Cumulative Water Consumption Generation

Related Project No.	Land Use	Size	Water Consumption Rate (gpd/unit) [a]	Water Consumed (gpd)
10	Apartments	110 du	188.88 gal/du/day	20,768
11	Apartments	600 du	188.88 gal/du/day	113,280
	Retail	20,000 sf	0.1 gal/sf/day	2,000
12	Affordable Apartments	75 du	188.88 gal/du/day	14,188.88
13	Office Condominiums	135 du	188.88 gal/du/day	25,488
	Live/Work Condominiums	402 du	188.88 gal/du/day	75,898
14	Apartments	261 du	188.88 gal/du/day	49,277
	Specialty Retail	6,398 sf	0.1 gal/sf/day	640
15	Condominiums	629 du	188.88 gal/du/day	118,755
	Retail	27,000 sf	0.1 gal/sf/day	2,700
16	Condominiums	54 du	188.88 gal/du/day	10,195
17	Office	880,000 sf	0.19 gal/sf/day	167,200
18	Auto Sales & Parking Lot	25,880 sf	0.1 gal/sf/day	2,588
19	Apartments	65 du	188.88 gal/du/day	12,272
20	Imageing Center, Pharmacy, Surgical Suites & Physician Offices	150,000 sf	0.19 gal/sf/day	28,500
21	Apartments	84 du	188.88 gal/du/day	15,859
22	Performing Arts High School	64 classrooms	10.24 gal/student/day	655
	Performing Arts Theater	1,600 seats	5.12 gal/seat/day	8,192
23	Apartments	210 du	188.88 gal/du/day	39,648
	Retail	10,966 sf	0.1 gal/sf/day	1,097
24	Condominiums	311 du	188.88 gal/du/day	58,717
	Retail	7,294 sf	0.1 gal/sf/day	729
25	Apartments	725 du	188.88 gal/du/day	136,880
	Retail	39,999 sf	0.1 gal/sf/day	4,000
26	Apartments	70 du	188.88 gal/du/day	13,216
27	U.S. District Courtrooms	41 courtrooms	n/a	n/a
	Judges Chambers	40 chambers	n/a	n/a
	Support Offices	n/a	n/a	n/a
	Circuit Satellite Library	n/a	n/a	n/a
	Parking	150 spaces	0.03 gal/sf/day	5
28	Hotel	80 rooms	166.4 gal/room/day	13,312
	Condo Hotel	112 du	166.4 gal/room/day	18,637
	Condominiums	165 du	188.88 gal/du/day	31,152
	Retail	7,500 sf	0.1 gal/sf/day	750
	Restaurant	13,000 sf	0.38 gal/sf/day	4,940
29	Condominiums	875 du	188.88 gal/du/day	88
	Retail	34,061 sf	0.1 gal/sf/day	3,406
	Restaurants	10,000 sf	0.38 gal/sf/day	3,800
30	Loft Apartments	209 du	188.88 gal/du/day	39,459
31	5-year Master Plan Project	n/a	n/a	n/a
32	Residential Lofts	n/a	n/a	n/a
	Retail	n/a	n/a	n/a
33	Office	25,500 sf	0.19 gal/sf/day	4,845
	Exam Facility	50 visitors	5.12 gal/visitor/day	256

Table IV-27
Estimated Cumulative Water Consumption Generation

Related Project No.	Land Use	Size	Water Consumption Rate (gpd/unit) [a]	Water Consumed (gpd)
	Conference Facility	350 visitors	5.12 gal/visitor/day	1,792
34	High-Rise Condominiums	132 du	188.88 gal/du/day	24,922
	Condominiums	73 du	188.88 gal/du/day	13,782
	Apartments	46 du	188.88 gal/du/day	8,685
	Retail	19,103 sf	0.1 gal/sf/day	1,910
35	Office	8,200,000 sf	0.19 gal/sf/day	1,558,000
	Hotel	750 rooms	166.4 gal/room/day	124,800
	Apartments	300 du	188.88 gal/du/day	56,640
	Retail	250,000 sf	0.1 gal/sf/day	25,000
	Museum	70,000 sf	0.03 gal/sf/day	2,100
36	Loft Apartments	300 du	188.88 gal/du/day	56,640
37	Multi-Use Development[c]	596,000 sf	0.1 gal/sf/day	59,600
38	Apartments	124 du	188.88 gal/du/day	23,411
	Retail	12,500 sf	0.1 gal/sf/day	1,250
39	EOC/POC/FDC	433 emp	10 gal/emp/day	4,330
	Metro Jail	512 beds	75 gal/bed/day	96,666
	Occupational Health & Services Div. (OHSD)	30,000 sf	0.19 gal/sf/day	5,700
	Fire Station #4	21 emp	10 gal/emp/day	210
40	Apartments	444 du	188.88 gal/du/day	83,827
	Retail	30,650 sf	0.1 gal/sf/day	3,065
41	Condominiums	130 du	188.88 gal/du/day	24,544
	Apartments	250 du	188.88 gal/du/day	47,200
	Supermarket	30,000 sf	0.1 gal/sf/day	3,000
	High Turnover Restaurant	150,000 sf	0.38 gal/sf/day	57,000
	Retail	200,000 sf	0.1 gal/sf/day	20,000
42	Loft Apartments	157 du	188.88 gal/du/day	29,642
43	Police Headquarters Facility (PHF)	2,400 emp	10 gal/emp/day	24,000
	Motor Transport Division (MTD)	56 emp	10 gal/emp/day	560
	Recreation Center[c]	60,000 sf	0.03 gal/sf/day	1,800
	Aiso St. Parking Facility	300 spaces	0.03 gal/sf/day	9
44	Restaurant	13,921 sf	0.38 gal/sf/day	5,290
	Retail	726 sf	0.1 gal/sf/day	73
	Pool/Event	726 sf	0.03 gal/sf/day	22
45	Elementary School	875 st	10.24 gal/student/day	8,960
46	Apartments	280 du	188.88 gal/du/day	52,864
	Retail	22,000 sf	0.1 gal/sf/day	2,200
47	Live/Work Lofts	91 du	188.88 gal/du/day	17,181
48	Condominiums	80 du	188.88 gal/du/day	15,104
	Apartments	299 du	188.88 gal/du/day	56,451
49	Lofts	82 du	188.88 gal/du/day	15,482
50	Congregate Care Facility	200 du	188.88 gal/du/day	37,760
51	Apartments	20 du	188.88 gal/du/day	3,776
	Office	32,670 sf	0.1 gal/sf/day	3,267
	Retail	37,600 sf	0.1 gal/sf/day	3,760

Table IV-27
Estimated Cumulative Water Consumption Generation

Related Project No.	Land Use	Size	Water Consumption Rate (gpd/unit) [a]	Water Consumed (gpd)
	Condominiums	565 du	188.88 gal/du/day	106,672
52	Live/Work Condominiums	190 du	188.88 gal/du/day	35,872
	Retail	5,540 sf	0.1 gal/sf/day	554
53	Condominiums	223 du	188.88 gal/du/day	42,102
	Cultural Center	7,000 sf	0.26 gal/sf/day	1,820
	Restaurant	15,000 sf	0.38 gal/sf/day	5,700
	Retail	22,008 sf	0.1 gal/sf/day	2,201
54	Condominiums	93 du	188.88 gal/du/day	17,558
55	Restaurant	11,018 sf	0.38 gal/sf/day	4,187
	Retail	8,927 sf	0.1 gal/sf/day	893
	Health Club	5,066 sf	0.38 gal/sf/day	1,925
56	Hall of Justice	30 emp	5.12 gal/emp/day	154
	Parking Structure	1,000 spaces (50,000 sf)	0.03 gal/sf/day	30
57	Condominiums	55 du	188.88 gal/du/day	10,384
	Retail	28,000 sf	0.1 gal/sf/day	2,800
58	Entertainment	33,423 sf	0.01 gal/sf/day	334
59	Hotel	1,200 rooms	166.4 gal/room/day	199,680
	Cinema	3,600 seats	5.12 gal/seat/day	18,432
	Theatre	7,000 seats	5.12 gal/seat/day	35,840
	Restaurants	345,000 sf	0.38 gal/sf/day	131,100
	Retail	498,000 sf	0.1 gal/sf/day	49,800
	Office	165,000 sf	0.19 gal/sf/day	31,350
	Apartments	800 du	188.88 gal/du/day	151,040
60	Hotel	480 rooms	166.4 gal/room/day	79,872
	Condominiums	836 du	188.88 gal/du/day	157,837
	Office	988,225 sf	0.1 gal/sf/day	98,823
	Retail	46,000 sf	0.1 gal/sf/day	4,600
61	Condominiums	118 du	188.88 gal/du/day	22,278
	Retail	3,000 sf	0.1 gal/sf/day	300
62	Condominiums	273 du	188.88 gal/du/day	51,542
	Retail	18,000 sf	0.1 gal/sf/day	1,800
63	Condominiums	464 du	188.88 gal/du/day	87,603
	Retail	25,000 sf	0.1 gal/sf/day	2,500
64	Condominiums	39 du	188.88 gal/du/day	7,363
65	Live/Work Lofts with Restaurant/Bar	78 du	188.88 gal/sf/day	14,726
66	Condominiums	247 du	188.88 gal/du/day	46,634
	Retail	10,675 sf	0.1 gal/sf/day	1,068
67	Condominiums	939 du	188.88 gal/du/day	177,283
	Retail/Restaurant	83,700 sf	0.1 gal/sf/day	31,806
68	Apartments	363 du	188.88 gal/du/day	68,534
	Retail	7,740	0.1 gal/sf/day	774
69	Condominiums	351 du	188.88 gal/du/day	66,269
	Retail	125,000 sf	0.1 gal/sf/day	12,500
	Restaurant	125,000 sf	0.38 gal/sf/day	47,500
70	Condominiums	128 du	188.88 gal/du/day	24,166

Table IV-27
Estimated Cumulative Water Consumption Generation

Related Project No.	Land Use	Size	Water Consumption Rate (gpd/unit) [a]	Water Consumed (gpd)
	Retail	3,472 sf	0.1 gal/sf/day	347
	Restaurant	2,200 sf	0.38 gal/sf/day	836
71	Condominiums	225 du	188.88 gal/du/day	42,480
	Hotel	200 rooms	166.4 gal/room/day	33,280
	Retail	30,000 sf	0.1 gal/sf/day	3,000
	Restaurant	32,000 sf	0.3 gal/sf/day	12,160
72	Condominiums	311 du	188.88 gal/du/day	58,717
73	Bar/Lounge	8,770 sf	0.38 gal/sf/day	3,333
74	Condominiums	300 du	188.88 gal/du/day	56,640
75	Condominiums	172 du	188.88 gal/du/day	32,474
	Retail	6,850 sf	0.1 gal/sf/day	685
76	Condominiums	130 du	188.88 gal/du/day	24,544
	Retail	7,037 sf	0.1 gal/sf/day	704
77	Supermarket	17,000 sf	0.1 gal/sf/day	1,700
	Retail	4,200 sf	0.1 gal/sf/day	420
78	Condominiums	84 du	188.88 gal/du/day	15,859
	Bar	6,000 sf	0.38 gal/sf/day	2,280
79	Condominiums	570 du	188.88 gal/du/day	107,616
	Apartments	280 du	188.88 gal/du/day	52,864
	Retail	50,000 sf	0.1 gal/sf/day	5,000
80	Apartments (Ph 1)	90 du	188.88 gal/du/day	16,992
	Retail (Ph 1)	15,500 sf	0.1 gal/sf/day	1,550
	Apartments (Ph 2)	82 du	188.88 gal/du/day	15,482
	Retail (Ph 2)	17,300 sf	0.1 gal/sf/day	1,730
81	High School	1,206 st	10.24 gal/student/day	12,349
82	Gas Station with Canopy & Mini-Market (Reconstruct)	2,046 sf	0.1 gal/sf/day	205
	Gas Station with Canopy & Mini-Market (Demolish)	*2,044 sf*	*-0.1 gal/sf/day*	*-204*
83	Condominiums	900 du	188.88 gal/du/day	169,920
	Retail	19,000 sf	0.1 gal/sf/day	1,900
	Restaurant	19,200 sf	0.38 gal/sf/day	7,296
84	Apartments	74 du	188.88 gal/du/day	13,971
85	Condominiums	213 du	188.88 gal/du/day	40,214
	Retail	9,500 sf	0.1 gal/sf/day	950
86	Apartments	204 du	188.88 gal/du/day	20
	Retail	5,000 sf	0.1 gal/sf/day	500
87	Live/Work Condominiums	132 du	188.88 gal/du/day	24,922
88	Condominiums	330 du	188.88 gal/du/day	62,304
	Retail	2,800 sf	0.1 gal/sf/day	280
	Restaurant	9,200 sf	0.38 gal/sf/day	3,496
	Health Club	56,200 sf	0.38 gal/sf/day	21,356
89	Condominiums	240 du	188.88 gal/du/day	45,312
90	Condominiums	222 du	188.88 gal/du/day	41,914
91	Condominiums	198 du	188.88 gal/du/day	37,382

Table IV-27
Estimated Cumulative Water Consumption Generation

Related Project No.	Land Use	Size	Water Consumption Rate (gpd/unit) [a]	Water Consumed (gpd)
92	Office	960,000 sf	0.1 gal/sf/day	96,000
	Retail	100,000 sf	0.1 gal/sf/day	10,000
93	Condominiums	331 du	188.88 gal/du/day	62,493
	Retail	10,000 sf	0.1 gal/sf/day	1,000
	Restaurant	5,985 sf	0.38 gal/sf/day	2,274
94	Condominiums	1,648 du	188.88 gal/du/day	311,142
	Apartments	412 du	188.88 gal/du/day	77,786
	County Office Building	681,000 sf	0.1 gal/sf/day	68,100
	Retail/Restaurant/ Supermarket/Healthclub	449,000 sf	0.38 gal/sf/day	170,620
	Hotel	275 rooms	166.4 gal/room/day	45,760
95	Condominiums	300 du	188.88 gal/du/day	56,640
	Retail	34,000 sf	0.1 gal/sf/day	3,400
96	Condominiums	118 du	188.88 gal/du/day	22,278
97	Condominiums	297 du	188.88 gal/du/day	56,074
98	Condominiums	168 du	188.88 gal/du/day	31,718
99	Condominiums	250 du	188.88 gal/du/day	47,200
	Retail	7,283 sf	0.1 gal/sf/day	728
100	Condominiums	190 du	188.88 gal/du/day	35,872
101	Condominiums	550 du	188.88 gal/du/day	103,840
102	Retail	100,000 sf	0.1 gal/sf/day	10,000
103	Office	930,000 sf	0.19 gal/sf/day	176,700
104	Condominiums	407 du	188.88 gal/du/day	76,842
	Retail	7,472 sf	0.1 gal/sf/day	747
105	Condominiums	334 du	188.88 gal/du/day	63,059
	Retail	10,000 sf	0.1 gal/sf/day	1,000
106	Condominiums	190 du	188.88 gal/du/day	35,872
107	Condominiums	130 du	188.88 gal/du/day	24,544
	Retail	7,030 sf	0.1 gal/sf/day	703
108	Condominiums	420 du	188.88 gal/du/day	79,296
109	Condominiums	220 du	188.88 gal/du/day	41,536
110	Apartments	600 du	188.88 gal/du/day	113,280
	Retail	30,000 sf	0.1 gal/sf/day	3,000
111	Condominiums	210 du	188.88 gal/du/day	39,648
	Retail	9,000 sf	0.1 gal/sf/day	900
112	Condominiums	400 du	188.88 gal/du/day	75,520
	Retail	20,000 sf	0.1 gal/sf/day	2,000
113	Condominiums	425 du	188.88 gal/du/day	80,240
	Apartments	425 du	188.88 gal/du/day	80,240
114	Wholesale Market	78,972 sf	0.1 gal/sf/day	7,897
115	Condominiums	420 du	188.88 gal/du/day	79,296
	Retail	40,000 sf	0.1 gal/sf/day	4,000
116	Condominiums	272 du	188.88 gal/du/day	51,354
	Retail	6,431 sf	0.1 gal/sf/day	643
	Restaurant	8,000 sf	0.38 gal/sf/day	3,040
117	Condominiums	622 du	188.88 gal/du/day	117,434
118	Condominiums	186 du	188.88 gal/du/day	35,117

Table IV-27
Estimated Cumulative Water Consumption Generation

Related Project No.	Land Use	Size	Water Consumption Rate (gpd/unit) [a]	Water Consumed (gpd)
	Retail	6,200 sf	0.1 gal/sf/day	620
119	Condominiums	102 du	188.88 gal/du/day	19,258
120	Condominiums	96 du	188.88 gal/du/day	18,125
	Retail	7,800 sf	0.1 gal/sf/day	780
121	Condominiums	159 du	188.88 gal/du/day	30,019
	Restaurant	6,827 sf	0.38 gal/sf/day	2,594
122	Gratts Primary School	380 seats	10.24 gal/student/day	1,802
		176 st	n/a	18,125
123	Condominiums	96 du	188.88 gal/du/day	20,301
	Hotel	122 rooms	166.4 gal/room/day	1,500
	Retail	15,000 sf	0.1 gal/sf/day	30,900
124	Wholesale	309,000 sf	0.1 gal/sf/day	18,200
125	Wholesale	182,000 sf	0.1 gal/sf/day	60,038
126	Condominiums	318 du	188.88 gal/du/day	30,208
127	Condominiums	160 du	188.88 gal/du/day	24,733
128	Condominiums	131 du	188.88 gal/du/day	18,125
129	High-Rise Condominiums	96 du	188.88 gal/du/day	20,301
	Hotel	122 rooms	166.4 gal/room/day	1,000
	Restaurant/Retail	10,000 sf	0.38 gal/sf/day	17,370
130	Apartments	92 du	188.88 gal/du/day	2,425
	Retail	24,250 sf	0.1 gal/sf/day	4,608
	Office	24,250 sf	0.19 gal/sf/day	66,646
131	Condominiums	353 du	188.88 gal/du/day	1,890
	Retail	18,900 sf	0.1 gal/sf/day	2,280
	Restaurant	6,000 sf	0.3 gal/sf/day	28,320
132	Condominiums	150 du	188.88 gal/du/day	320,489
133	Light Industry	3,204,887 sf	0.01 gal/sf/day	551
	Restaurant	1,450 sf	0.38 gal/sf/day	2,347
	Wholesale	23,468 sf	0.1 gal/sf/day	146,698
134	High-Rise Condominiums	777 du	188.88 gal/du/day	2,500
	Specialty Retail	25,000 sf	0.1 gal/sf/day	2,594
			Related Projects Total	*9,953,178*
			Proposed Project Total	*18,101*
			Cumulative Total	***9,971,279***

Notes: sf = square feet; gal = gallons; du = dwelling unit; gpd =- gallons per day.
[a] *Based on the wastewater generation rates provided by City of Los Angeles, Department of Public Works, Bureau of Engineering, March 2002. (Water consumption is assumed to be 118 percent of wastewater generation for residential uses and 128 percent of wastewater generation for non-residential uses.)*
Source: Christopher A. Joseph & Associates, May 2009.

Water requirements for any project that is consistent with the City's General Plan have been taken into account in the planned growth in overall water demand. For projects that are not consistent with the General Plan or that meet the requirements established in Sections 10910-10915 of the State Water Code, a water availability assessment demonstrating sufficient water supply is required on a project-by-project basis.

As discussed previously, the LAAFP has between approximately 50 to 150 mgd remaining treatment capacity, depending on the season. The additional approximately 10.0 mgd of water demanded by the proposed Project and related projects would represent between approximately 6.7 and 20 percent, respectively, of the excess treatment capacity currently available at the LAAFP. Similar to the proposed Project, related projects would be required to improve or replace substandard or deteriorated utility lines per City of Los Angeles Building and Safety Code and Department of Public Works requirements. As the proposed Project is consistent with the General Plan and the water demands of related projects are already taken into account in the UWMP or would be evaluated on a project-by-project basis, cumulative impacts on water treatment facilities and infrastructure would be less than significant and no mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving the project site. As discussed under Question 8(d), the Project site is fully developed with existing residential and industrial buildings and is served by existing storm drains on Beverly Boulevard to the north of the Project site and Lucas Avenue to the south of the Project site.[136] The proposed project would involve the demolition of all existing onsite structures and their replacement with a new residential building, resulting in an increase in building footprint as compared to the combined footprint of the existing structures. As such, the proposed Project would slightly decrease the amount of permeable surface area on the Project site, which would decrease the amount of stormwater that would enter the groundwater system through percolation and increase the amount of stormwater that would enter the City's storm drains. However, the Project site is not located adjacent to any stream or river, and project runoff would continue to drain into the existing City storm drain infrastructure. Moreover, as outlined in Response 16(b), the HTP would have ample capacity to handle wastewater generated by the proposed Project. Additionally, the Project would be required to prepare and implement a SUSMP and undergo a preliminary review by the City to ensure that the Project would not exceed the capacity of the existing storm drain system. Therefore, impacts with respect to existing or planned drainage systems would be less than significant. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

Cumulative Impacts

Less Than Significant Impact. Future development of the proposed Project in conjunction with the related projects identified in Section II, Project Description, of this Initial Study could affect the amount and the rate of runoff within their respective drainage areas. Whether the effects would be positive or

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[136] *City of Los Angeles Department of Public Works, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org, May 13, 2009.*

adverse would depend on a number of factors including the amount of pervious/impervious surfaces that would change, the drainage improvements, etc. for each of those projects. It is anticipated that, since the entire study area containing the related projects is heavily urbanized, the great majority of the related projects sites are also impervious. In addition, under current open space and streetscape requirements, new development is more likely to incorporate more landscaped open space than under existing conditions. Nonetheless, similar to the proposed Project, each of the related projects would be required to prepare and implement a SUSMP and undergo a preliminary review by the City to determine what, if any, drainage improvements and BMPs would be required to ensure that the storm drain capacity of the system serving each of the related projects is adequate. Therefore, cumulative impacts to stormwater drainage facilities would be less than significant and no mitigation measures are required. No further analysis of this issue in an environmental impact report is necessary.

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. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City of Los Angeles' water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct and State Water Project, and from the Metropolitan Water District of Southern California (obtained from the Colorado River Aqueduct). These three sources, along with recycled water, are expected to supply the City of Los Angeles' water needs in the years to come. Overall, any project that is consistent with the City of Los Angeles General Plan has been taken into account in the planned growth in water demand.

As shown in Table IV-25, Estimated Proposed Project Water Consumption, under Question 16(b), the proposed Project would demand approximately 18,101 gpd or approximately 0.018 mgd of water. As the proposed Project would be consistent with the land uses and zoning provided within the City's General Plan and Planning and Zoning Code (see Question 9, Land Use and Planning), the proposed Project's water supply needs have already been accommodated within water supply projections for the region. The City's long-range water supply projections are based on the LADWP's Urban Water Management Plan, which incorporates the population growth anticipated by the Los Angeles General Plan and the implementation of water conservation measures. Pursuant to the LADWP new development requirements of March 2008, the Project would incorporate the following series of water conservation devices and measures as applicable to increase water conservation:

- Install high efficiency toilets (1.28 gallons per flush or less, includes dual flush).
- Install high efficiency urinals (0.5 gallons per flush or less, includes waterless).
- Install faucet hardware in restrooms with a faucet flow rate of 1.5 gallons per minute or less.
- Install showerheads with a flow rate of 2.0 gallons per minute or less.

- Limit showers to one showerhead per shower stall.
- Install high efficiency clothes washers (water factor of 6.0 or less) where clothes washers are provided.
- Install high efficiency dishwashers (Energy Star rated) where dishwashers are provided.
- Install domestic water heating systems located in close proximity to point(s) of use, as feasible; use of tank-less and on-demand water heaters as feasible.
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration.
- Single-pass cooling shall be strictly prohibited.
- Install irrigation systems that meet the following requirements:
    - Weather-based irrigation controller with rain shutoff.
    - Flow sensor and master valve shutoff (large landscapes).
    - 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 plant materials.
    - Use of landscaping contouring to minimize precipitation runoff.
- The Project is mandated to use recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary).

Furthermore, the Project would comply with water conservation measures, including Titles 20 and 24 of the California Administrative Code and Chapter XII of the LAMC, to reduce the projected water demand, which, relative to population growth, have resulted in decreased demand in recent years.

Since the Project would be consistent with the General Plan's growth projections and would implement the City's mandatory water conservation measures, it is anticipated that the Project would not cause the LADWP to exceed its existing and projected entitled resources. Furthermore, the proposed Project would be constructed in accordance with all applicable water conservation measures mandated by the City and State including the City of Los Angeles Water Management Ordinance No. 170,978. The Water Management Ordinance requires that Project to implement 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). The Project's water conservation features are discussed in detail in Section II, Project Description, of this Initial Study.

Therefore, the Project would have a less-than-significant impact with respect to water entitlements and supply. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed Project in conjunction with the 134 related projects identified in Section II, Project Description, of this Initial Study would result in an increase in the demand for water service in LADWP's service area and would further increase the regional demand for water supplies. As shown in Table IV-27, Estimated Cumulative Water Consumption, under Question 16(b), the proposed Project and the related projects would demand approximately 10.0 mgd of water. Each of the related projects would be evaluated on a case-by-case basis for General Plan consistency. Water requirements for any project that is consistent with the City's General Plan have been taken into account in the planned growth in overall water demand. All related projects would be required to implement water conservation measures required under Titles 20 and 24 of the California Administrative Code and Chapter XII of the Los Angeles Municipal Code LAMC. For projects that are not consistent with the General Plan or that exceed a maximum size established under SB610 and 221 (Sections 10910-10915 of the State Water Code), a water availability assessment demonstrating sufficient water supply is required on a project-by-project basis. Water supplies to serve projects that are not of sufficient size to trigger SB610 and 221 would be addressed through the LADWP's Urban Water Management Plan. As the proposed Project is consistent with the General Plan and the water demands of related projects are already taken into account in the Urban Water Management Plan or would be evaluated on a project-by-project basis, the proposed Project and related projects would have a less-than-significant cumulative impact related to water supplies. Therefore, no mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

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. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project site would be exceeded. As discussed under Question 16(b), the proposed Project's generation approximately 15,880 gpd or approximately 0.016 mgd of wastewater at the Project site would be accommodated as part of the remaining 88 mgd of treatment capacity currently available at the HTP. Additionally, in order to comply with the City's water conservation and sewer allocation ordinances, the proposed Project's new residences would be equipped with water conservation devices (i.e., showerheads, toilets, faucets, etc.). The standard City sewage generate rate used to estimate the proposed Project's future wastewater generation, as shown in Table-24, Estimated Proposed Project Wastewater Generation, in Response 16(b), reflect these water conservation measures. Furthermore, the Sewer Allocation Ordinance assures that no project may connect to the City's sewer conveyance or treatment system until scheduled treatment capacity at HTP is available. The capacity of the HTP and other treatment plants serving the Los Angeles

area are scheduled to be sufficient to sustain wastewater treatment needs to the year 2015.[137] Since the Project would not connect to the City's wastewater conveyance and treatment system until scheduled capacity is determined, the Project would not exceed the scheduled capacity of the HTP. Therefore, the Project would have a less-than-significant impact with respect to wastewater treatment capacity. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

Cumulative Impacts

Less Than Significant Impact. As with the proposed Project, the 134 related projects identified in Section II, Project Description, of this Initial Study would be located within the HTP service area. Also, similar to the proposed Project, each related project would be required to comply with City and State water conservation programs and the City's Sewer Allocation Ordinance. No related project would be allowed to connect to the City's wastewater conveyance or treatment system until scheduled capacity is available at HTP. Therefore, related projects would not be permitted to exceed HTP's scheduled treatment capacity and cumulative impacts with respect to wastewater treatment capacity would be less than significant. As such, no mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

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 With Mitigation. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The City of Los Angeles currently does not own or operate any landfill facilities. Most waste generated in the City of Los Angeles is disposed of at the Sunshine Canyon Landfill or the Chiquita Canyon Landfill. Both facilities accept the following waste types:

The Sunshine Canyon Landfill has a daily permitted intake of 12,100 tons per day and a remaining permitted capacity of 111,200,000 cubic yards of solid waste.[138] In 2003, the City and the California Integrated Waste Management Board (CIWMB) approved the solid waste facility permit for Phase I of the Sunshine Canyon Landfill.[139] The permit initially allows a maximum capacity of 16 million tons.[140] As of November 30, 2007, the Sunshine Canyon Landfill accepted an average of 6,441 tons per day,[141] for a remaining permitted intake approximately 5,659 tons per day. The Chiquita Canyon Landfill has a daily

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[137] *City of Los Angeles, Citywide General Plan Framework, December 1996.*

[138] *California Integrated Waste Management Board, Solid Waste Information System (SWIS), Facility/Site Search, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: http://www.ciwmb.ca.gov/SWIS/19-AA-2000/Detail/, August 11, 2008.*

[139] *Solid Waste Facility Permit No. 19-AR-0002-2.*

[140] *California Integrated Waste Management Board Resolution 2003-289, May 13, 2003.*

[141] *Sunshine Canyon Landfill, Update from Project Director, website: http://www.sunshinecanyonlandfill.com/update/_index.htm, August 11, 2008.*

permitted intake of 6,000 tons per day and a remaining permitted capacity of 35,800,000 cubic yards.[142] The Chiquita Canyon Landfill typically accepts between 5,000 to 6,000 tons per day of solid waste,[143] for a remaining permitted intake of approximately 0 to 1,000 tons per day.

Construction-Related Impacts

Construction of the proposed Project would generate solid waste (in the form of demolition and construction debris) that would need to be disposed of at area landfills. The demolition phase of the proposed Project would involve the demolition of all existing residential and industrial uses on the project site (one occupied multi-family residential building with 12 apartments, one occupied single-family residential unit, unoccupied residential buildings, and an industrial building) and the removal of associated landscaping and parking. Excavation and grading would occur on the Project site to accommodate the Project's proposed subterranean parking. The existing development would be replaced by a five-story multi-family residential building comprised of 153 for-rent dwelling units with associated landscaping, amenities, and three levels of under-structure parking.

The proposed Project could be expected to generate approximately 6,468,641.5 pounds[144] (2,888 tons) of waste over the 15 month construction period, resulting in approximately 9.6 tons of construction/demolition waste per day.[145] Much of this material would be recycled and salvaged to the maximum extent feasible. Materials not recycled would be disposed of at local landfills. Combined with the recycling of most of the solid waste generated by the construction of the proposed Project, short-term construction impacts to landfills and solid waste service could be accommodated by either the Sunshine Canyon Landfill or the Chiquita Canyon Landfill.

Operation

It is anticipated that the proposed Project would result in a net increase of approximately 612 pounds (or 0.306 tons) of solid waste per day[146] before any recycling activities, which could be adequately

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[142] *California Integrated Waste Management Board, Solid Waste Information System (SWIS), Facility/Site Search, Facility/Site Summary Details: Chiquita Canyon Sanitary Landfill (19-AA-0052), website: http://www.ciwmb.ca.gov/SWIS/19-AA-0052/Detail/, August 11, 2008.*

[143] *Chiquita Canyon, Frequently Asked Questions, website: http://www.chiquitacanyon.com/faq.php, August 11, 2008.*

[144] *111,562 sf * 4.38 lbs/sf (residential Construction) + 52,000 sf * 115 lbs/sf (Residential Demolition) = 6,468,641.5 pounds. (2,888 tons)*

(Calculation based on generation rates provided by the United States Environmental Protection Agency (U.S. EPA), Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-3, June 1998.)

[145] *Based on an assumed demolition schedule of two months (or 40 working days) and a construction schedule of 15 months (20 x 20 = 400 working days). Construction period spans November 2009 to March 2011.*

[146] *153 multi-family units * 4 lbs/day = 612 lbs/day of solid waste.*

(Calculation based on generation rates provided by the City of Los Angeles Bureau of Sanitation, "Solid Waste Generation", 1981.)

accommodated by landfills. Additionally, pursuant California AB 939, each city and county in the State must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, it is reasonable to assume that a substantial quantity of the waste that would be generated by the proposed project during operation would be reused or recycled in accordance with City policies. Therefore, either the Sunshine Canyon Landfill or the Chiquita Canyon Landfill could adequately accommodate the Project.

While it is anticipated that, the two landfills would have adequate capacity to accommodate the waste generated by daily construction and operation of the Project, because the precise landfill that would serve the Project is unknown, solid waste impacts would be potentially significant. However, with implementation of Mitigation Measures 16-1 through 16-4, both construction and operational impacts regarding solid waste would be reduced to a less than significant level.

Therefore, the proposed Project would result in a less-than-significant impact with respect to demolition and construction waste.

Mitigation Measures

16-1 Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.

16-2 To facilitate on-site separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.

16-3 Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.

16-4 A recyclables collection room shall be maintained and available for residential use at all time.

Cumulative Impacts

Less Than Significant. Development of the Project and related projects identified in Section II, Project Description, of this Initial Study would generate solid waste during their respective construction periods, and on an on-going operational basis following the completion of construction. Solid waste generation is expected to increase over existing conditions throughout the Project study area. It is anticipated that the proposed Project and other related projects would not conflict with solid waste policies and objectives in the SRRE or its updates, CISWMPP, the General Plan Framework Element or the Curbside Recycling

Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE, based on the programs in place to meet such diversion requirements. With the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Therefore, the proposed Project and related projects, with respect to solid waste disposal capacity, would not be cumulatively significant. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

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. With the implementation of the mitigation measure below, solid waste generated onsite by the proposed Project would be disposed of in accordance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. In addition, as discussed in Response 16(f), the combined remaining daily intake of the Sunshine Canyon and Chiquita Canyon Landfills would be able to accommodate the solid waste generated by the proposed project and no exemptions with respect to solid waste disposal would be needed nor are they requested. Therefore, since the proposed Project would comply with federal, State, and local regulations no impact with respect to these regulations would occur. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

Cumulative Impacts

Less Than Significant Impact. Implementation of the proposed Project in combination with the 134 related projects identified in Section II, Project Description, of this Initial Study would further increase regional demands on landfill capacities. Similar to the proposed Project, each of the related projects would be required to comply with applicable federal, State, and local regulations, and no impact with respect to these regulations would occur. As such, no mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

Energy Supply Facilities and Distribution Infrastructure

Electricity

The Los Angeles Department of Water and Power (LADWP) provides electricity to the City of Los Angeles (City). LADWP obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power. LADWP obtains power from four municipally owned power plants within the Los Angeles Basin, LADWP Hydrogenerators on the Los Angeles Aqueduct, and shared-ownership generating facilities in the Southwest, and also purchases power from the Southwest and Pacific Northwest. Currently LADWP power is generated in the Los Angeles Basin at the following generating stations: Haynes Generating Station near Seal Beach, Scattergood

Generating Station near Playa del Rey, Valley Generating Station in the San Fernando Valley, and Harbor Generating Station at Los Angeles Harbor. However, LADWP also purchases excess power, as it is made available, from self-generators interconnected with LADWP within the City. In total, LADWP operates 20 receiving stations and 174 distribution stations to provide electricity to customers, with additional facilities to be acquired as their load increases.

Electrical distribution lines that would serve the Project site and the surrounding area include an overhead (4.8 kilovolt (kV)) line adjacent to the site running along West Beverly Boulevard and along the south half of South Lucas Avenue, and an overhead along the side of the building facing the alley. A 34.5 kV underground distribution line is adjacent to the site, running along West Beverly Boulevard. There are currently no electrical service problems or deficiencies in the Project area; however, implementation of the proposed Project would require an on-site transformation facility.[147]

As shown in Table IV-28, Existing Electricity Demand, the existing uses on the Project site currently consume approximately 200.4 kilowatt-hours (kWh) of electricity per day. The proposed Project would be anticipated to consume approximately 2,358.5 kWh per day[148], resulting in an increase of approximately 2,158.1 kWh over the existing uses on the Project site. LADWP would be able to accommodate the proposed Project's demand for electricity service with the existing electricity supplies.[149]

Table IV-28
Existing Electricity Demand

Land Use	Size (du)	Consumption Rate (kWh/du/year)	Daily Total (kWh/day)
Single-Family Residential	1	5,626.5	15.4
Multi-Family Residential	12	5,626.5	185.0
		Total	***200.4***

Notes: du = dwelling unit; kWh = kilowatt-hours
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.

These calculations do not account for many of the energy conservation measures that would be included in the Project and thus represent a conservative analysis. As noted under Question 1(d), the proposed Project would improve upon Title 24 Building Energy Efficiency Standards by 14 percent and would therefore not have any significant impacts with respect to the inefficient use or waste of energy.

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147 *Los Angeles Department of Water and Power, Environmental Services, Distribution Planning, response to service letter, electronic correspondence with Shilpa Gupta, Environmental Specialist, September 24, 2008.*

148 *[153 units * 5,626.5 kWh/du/year] / 365 days/year = 2,358.5 kWh/year*

149 *Ibid.*

Implementation of the proposed Project would not require new (off-site) energy supply facilities and distribution infrastructure or capacity enhancing alternations to existing facilities. Similarly, the proposed Project would incorporate several energy conservation measures in excess of minimum State requirements and would improve upon the existing uses' energy efficiency. Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Implementation of the proposed Project in combination with the 134 related projects listed in Table II-1, Related Projects, in Section II, Project Description, of this Initial Study and other future cumulative growth in the City would increase the demand for electricity. This projected cumulative increase in electricity demand would be up to approximately 1,335,298.3 kWh per day, as shown in Table IV-29, Estimated Cumulative Electricity Demand. Coupled with other potential growth within the service area of LADWP, additional cumulative increases in demand for electricity could occur.

Table IV-29
Estimated Cumulative Electricity Demand

Related Project No.	Land Use	Size	Consumption Rate (kWh/du or sf/year)[a]	Electricity Demand (kWh/du or sf/day)
1	Community Building[1]	32,000 sf	10.5 kWh/sf/year	920.5
	Performing Arts[1]	25,000 sf	10.5 kWh/sf/year	719.2
	Plaza House[1]	14,100 sf	10.5 kWh/sf/year	405.6
	Educational Center & Museum[1]	23,700 sf	10.5 kWh/sf/year	681.8
2	Artist-in-lofts	30 du	5,626.5 kWh/du/year	462.5
	Retail	5,000 sf	13.55 kWh/sf/year	185.6
	Office	20,000 sf	12.95 kWh/sf/year	709.6
3	Apartments	87 du	5,626.5 kWh/du/year	1,341.1
	Commercial	70,231 sf	13.55 kWh/sf/year	2,607.2
4	Office	5,432 sf	12.95 kWh/sf/year	192.7
	Uniform Sales Store	7,168 sf	13.55 kWh/sf/year	266.1
5	Grocery	40,000 sf	53.30 kWh/sf/year	5,841.1
	Retail	30,000 sf	13.55 kWh/sf/year	1,113.7
	Community Facility[1]	40,000 sf	10.5 kWh/sf/year	1,150.7
6	Condominiums	105 du	5,626.5 kWh/du/year	1,618.6
	Retail	4,500 sf	13.55 kWh/sf/year	167.1
7	Apartments	21 du	5,626.5 kWh/du/year	323.7
8	Condominiums	460 du	5,626.5kWh/du/year	7,090.9
9	Apartments	102 du	5,626.5 kWh/du/year	1,572.3
	Retail	4,212 sf	13.55 kWh/sf/year	156.4
10	Apartments	110 du	5,626.5 kWh/du/year	1,695.7
11	Apartments	600 du	5,626.5 kWh/du/year	9,249
	Retail	20,000 sf	13.55 kWh/sf/year	742.5
12	Affordable Apartments	75 du	5,626.5 kWh/du/year	1,156.1
13	Office Condominiums	135 du	5,626.5 kWh/du/year	2,081
	Live/Work Condominiums	402 du	5,626.5 kWh/du/year	6,196.9
14	Apartments	261 du	5,626.5 kWh/du/year	4,023.3

Table IV-29
Estimated Cumulative Electricity Demand

Related Project No.	Land Use	Size	Consumption Rate (kWh/du or sf/year)[a]	Electricity Demand (kWh/du or sf/day)
	Specialty Retail	6,398 sf	13.55 kWh/sf/year	237.5
15	Condominiums	629 du	5,626.5 kWh/du/year	9,696.1
	Retail	27,000 sf	13.55 kWh/sf/year	1,002.3
16	Condominiums	54 du	5,626.5 kWh/du/year	832.4
17	Office	880,000 sf	12.95 kWh/sf/year	918.2
18	Auto Sales & Parking Lot	25,880 sf	13.55 kWh/sf/year	960.8
19	Apartments	65 du	5,626.5 kWh/du/year	1,002
20	Imageing Center, Pharmacy, Surgical Suites & Physician Offices[1]	150,000 sf	10.5 kWh/sf/year	4,315.1
21	Apartments	84 du	5,626.5 kWh/du/year	1,294.9
22	Performing Arts High School	64 classrooms	10.5 kWh/sf/year	n/a
	Performing Arts Theater[1]	1,600 seats	10.5 kWh/sf/year	n/a
23	Apartments	210 du	5,626.5 kWh/du/year	3,237.2
	Retail	10,966 sf	13.55 kWh/sf/year	407.1
24	Condominiums	311 du	5,626.5 kWh/du/year	4,794.1
	Retail	7,294 sf	13.55 kWh/sf/year	270.8
25	Apartments	725 du	5,626.5 kWh/du/year	11,175.9
	Retail	39,999 sf	13.55 kWh/sf/year	1,484.9
26	Apartments	70 du	5,626.5 kWh/du/year	1,079.1
27	U.S. District Courtrooms[1]	41 courtrooms	10.5 kWh/sf/year	n/a
	Judges Chambers[1]	40 chambers	10.5 kWh/sf/year	n/a
	Support Offices[1]	n/a	10.5 kWh/sf/year	n/a
	Circuit Satellite Library[1]	n/a	10.5 kWh/sf/year	n/a
	Parking[1]	150 spaces	10.5 kWh/sf/year	n/a
28	Hotel	80 rooms	9.95 kWh/sf/year	n/a
	Condo Hotel	112 du	5,626.5 kWh/du/year	1,726.5
	Condominiums	165 du	5,626.5 kWh/du/year	2,543.5
	Retail	7,500 sf	13.55 kWh/sf/year	278.4
	Restaurant	13,000 sf	47.45 kWh/sf/year	1,690
29	Condominiums	875 du	5,626.5 kWh/du/year	13,488.2
	Retail	34,061 sf	13.55 kWh/sf/year	1,264.5
	Restaurants	10,000 sf	47.45 kWh/sf/year	1,300
30	Loft Apartments	209 du	5,626.5 kWh/du/year	3,221.7
31	5-year Master Plan Project	n/a	n/a	n/a
32	Residential Lofts	n/a	5,626.5 kWh/du/year	n/a
	Retail	n/a	13.55 kWh/sf/year	n/a
33	Office	25,500 sf	12.95 kWh/sf/year	904.7
	Exam Facility[1]	50 visitors	10.5 kWh/sf/year	n/a
	Conference Facility[1]	350 visitors	12.95 kWh/sf/year	n/a
34	High-Rise Condominiums	132 du	5,626.5 kWh/du/year	2,034.8
	Condominiums	73 du	5,626.5 kWh/du/year	1,125.3
	Apartments	46 du	5,626.5 kWh/du/year	709.1
	Retail	19,103 sf	13.55 kWh/sf/year	709.2
35	Office	8,200,000 sf	12.95 kWh/sf/year	290,931.5
	Hotel	750 rooms	9.95 kWh/sf/year	n/a

Table IV-29
Estimated Cumulative Electricity Demand

Related Project No.	Land Use	Size	Consumption Rate (kWh/du or sf/year)[a]	Electricity Demand (kWh/du or sf/day)
	Apartments	300 du	5,626.5 kWh/du/year	4,624.5
	Retail	250,000 sf	13.55 kWh/sf/year	9,280.8
	Museum[1]	70,000 sf	10.5 kWh/sf/year	2,013.7
36	Loft Apartments	300 du	5,626.5 kWh/du/year	4,624.5
37	Multi-Use Development[1]	596,000 sf	10.5 kWh/sf/year	17,145.2
38	Apartments	124 du	5,626.5 kWh/du/year	1,911.5
	Retail	12,500 sf	13.55 kWh/sf/year	464
39	EOC/POC/FDC[1]	433 emp	10.5 kWh/sf/year	n/a
	Metro Jail[1]	512 beds	10.5 kWh/sf/year	n/a
	Occupational Health & Services Div. (OHSD)	30,000 sf	12.95 kWh/sf/year	1,064.4
	Fire Station #4[1]	21 emp	10.5 kWh/sf/year	n/a
40	Apartments	444 du	5,626.5 kWh/du/year	6,844.3
	Retail	30,650 sf	13.55 kWh/sf/year	1,137.8
41	Condominiums	130 du	5,626.5 kWh/du/year	2004
	Apartments	250 du	5,626.5kWh/du/year	3853.8
	Supermarket	30,000 sf	53.3 kWh/sf/year	4,380.8
	High Turnover Restaurant	150,000 sf	47.45 kWh/sf/year	19,500
	Retail	200,000 sf	13.55 kWh/sf/year	7,424.7
42	Loft Apartments	157 du	5,626.5 kWh/du/year	2,420.2
43	Police Headquarters Facility (PHF)[2]	2,400 emp	12.95 kWh/sf/year	n/a
	Motor Transport Division (MTD)[2]	56 emp	12.95 kWh/sf/year	n/a
	Recreation Center[1]	60,000 sf	10.5 kWh/sf/year	1,726
	Aiso St. Parking Facility[1]	300 spaces	10.5 kWh/sf/year	n/a
44	Restaurant	13,921 sf	47.45 kWh/sf/year	1,809.7
	Retail	726 sf	13.55 kWh/sf/year	27.0
	Pool/Event[1]	726 sf	10.5 kWh/sf/year	20.9
45	Elementary School	875 st	5.9 kWh/sf/year	n/a
46	Apartments	280 du	5,626.5 kWh/du/year	4,316.2
	Retail	22,000 sf	13.55 kWh/sf/year	816.7
47	Live/Work Lofts	91 du	5,626.5 kWh/du/year	1,402.8
48	Condominiums	80 du	5,626.5 kWh/du/year	1,233.2
	Apartments	299 du	5,626.5 kWh/du/year	4,609.1
49	Lofts	82 du	5,626.5 kWh/du/year	1,264
50	Congregate Care Facility	200 du	5,626.5 kWh/du/year	3,083
51	Apartments	20 du	5,626.5 kWh/du/year	308.3
	Office	32,670 sf	12.95 kWh/sf/year	1,159.1
	Retail	37,600 sf	13.55 kWh/sf/year	1,395.8
	Condominiums	565 du	5,626.5 kWh/du/year	8,709.5
52	Live/Work Condominiums	190 du	5,626.5 kWh/du/year	2,928.9
	Retail	5,540 sf	13.55 kWh/sf/year	205.7
53	Condominiums	223 du	5,626.5 kWh/du/year	3,437.6
	Cultural Center[1]	7,000 sf	10.5 kWh/sf/year	201.4
	Restaurant	15,000 sf	47.45 kWh/sf/year	1,950
	Retail	22,008 sf	13.55 kWh/sf/year	817

Table IV-29
Estimated Cumulative Electricity Demand

Related Project No.	Land Use	Size	Consumption Rate (kWh/du or sf/year)[a]	Electricity Demand (kWh/du or sf/day)
54	Condominiums	93 du	5,626.5 kWh/du/year	1,433.6
55	Restaurant	11,018 sf	47.45 kWh/sf/year	1,432.3
	Retail	8,927 sf	13.55 kWh/sf/year	331.4
	Health Club[1]	5,066 sf	10.5 kWh/sf/year	145.7
56	Hall of Justice[1]	30 emp	10.5 kWh/sf/year	n/a
	Parking Structure[1]	1,000 spaces (50,000 sf)	10.5 kWh/sf/year	1,438.4
57	Condominiums	55 du	5,626.5 kWh/du/year	847.8
	Retail	28,000 sf	13.55 kWh/sf/year	1,039.5
58	Entertainment[1]	33,423 sf	10.5 kWh/sf/year	961.5
59	Hotel	1,200 rooms	9.95 kWh/sf/year	n/a
	Cinema[1]	3,600 seats	10.5 kWh/sf/year	n/a
	Theatre[1]	7,000 seats	10.5 kWh/sf/year	n/a
	Restaurants	345,000 sf	47.45 kWh/sf/year	44,850
	Retail	498,000 sf	13.55 kWh/sf/year	18,487.4
	Office	165,000 sf	12.95 kWh/sf/year	5,854.1
	Apartments	800 du	5,626.5 kWh/du/year	12,332.1
60	Hotel	480 rooms	9.95 kWh/sf/year	n/a
	Condominiums	836 du	5,626.5 kWh/du/year	12,887
	Office	988,225 sf	12.95 kWh/sf/year	35,061.7
	Retail	46,000 sf	13.55 kWh/sf/year	1,707.7
61	Condominiums	118 du	5,626.5 kWh/du/year	1,819
	Retail	3,000 sf	13.55 kWh/sf/year	111.4
62	Condominiums	273 du	5,626.5 kWh/du/year	4,208.3
	Retail	18,000 sf	13.55 kWh/sf/year	668.2
63	Condominiums	464 du	5,626.5 kWh/du/year	7,152.6
	Retail	25,000 sf	13.55 kWh/sf/year	928.1
64	Condominiums	39 du	5,626.5 kWh/du/year	601.2
65	Live/Work Lofts with Restaurant/Bar	78 du	5,626.5 kWh/du/year	1,202.4
66	Condominiums	247 du	5,626.5 kWh/du/year	3,807.5
	Retail	10,675 sf	13.55 kWh/sf/year	396.3
67	Condominiums	939 du	5,626.5 kWh/du/year	14,474.7
	Retail/Restaurant[3]	83,700 sf	47.45 kWh/sf/year	10,881
68	Apartments	363 du	5,626.5 kWh/du/year	5,596.7
	Retail	7,740	13.55 kWh/sf/year	287.3
69	Condominiums	351 du	5,626.5 kWh/du/year	5,410.7
	Retail	125,000 sf	13.55 kWh/sf/year	4,640.4
	Restaurant	125,000 sf	47.45 kWh/sf/year	16,250
70	Condominiums	128 du	5,626.5 kWh/du/year	1,973.1
	Retail	3,472 sf	13.55 kWh/sf/year	128.9
	Restaurant	2,200 sf	47.45 kWh/sf/year	286
71	Condominiums	225 du	5,626.5 kWh/du/year	3,468.4
	Hotel	200 rooms	9.95 kWh/sf/year	n/a
	Retail	30,000 sf	13.55 kWh/sf/year	1,113.7
	Restaurant	32,000 sf	47.45 kWh/sf/year	4,160
72	Condominiums	311 du	5,626.5 kWh/du/year	4,794.1

Table IV-29
Estimated Cumulative Electricity Demand

Related Project No.	Land Use	Size	Consumption Rate (kWh/du or sf/year)[a]	Electricity Demand (kWh/du or sf/day)
73	Bar/Lounge[3]	8,770 sf	47.45 kWh/sf/year	1,140.1
74	Condominiums	300 du	5,626.5 kWh/du/year	4,624.5
75	Condominiums	172 du	5,626.5 kWh/du/year	2,651.4
	Retail	6,850 sf	13.55 kWh/sf/year	254.3
76	Condominiums	130 du	5,626.5 kWh/du/year	2004
	Retail	7,037 sf	13.55 kWh/sf/year	261.2
77	Supermarket	17,000 sf	53.5 kWh/sf/year	2,482.5
	Retail	4,200 sf	13.55 kWh/sf/year	155.9
78	Condominiums	84 du	5,626.5 kWh/du/year	1,294.9
	Bar	6,000 sf	13.55 kWh/sf/year	222.7
79	Condominiums	570 du	5,626.5 kWh/du/year	8,786.6
	Apartments	280 du	5,626.5 kWh/du/year	4,316.2
	Retail	50,000 sf	13.55 kWh/sf/year	1,856.2
80	Apartments (Ph 1)	90 du	5,626.5 kWh/du/year	1,384.4
	Retail (Ph 1)	15,500 sf	13.55 kWh/sf/year	575.4
	Apartments (Ph 2)	82 du	5,626.5 kWh/du/year	1,264
	Retail (Ph 2)	17,300 sf	13.55 kWh/sf/year	642.2
81	High School	1,206 st	10.5 kWh/sf/year	n/a
82	Gas Station with Canopy & Mini-Market (Reconstruct)	2,046 sf	13.55 kWh/sf/year	76
	Gas Station with Canopy & Mini-Market (Demolish)	*2,044 sf*	*13.55 kWh/sf/year*	*-75.9*
83	Condominiums	900 du	5,626.5 kWh/du/year	13,873.6
	Retail	19,000 sf	13.55 kWh/sf/year	705.3
	Restaurant	19,200 sf	47.45 kWh/sf/year	2,496
84	Apartments	74 du	5,626.5 kWh/du/year	1,140.7
85	Condominiums	213 du	5,626.5 kWh/du/year	3,283.4
	Retail	9,500 sf	13.55 kWh/sf/year	352.7
86	Apartments	204 du	5,626.5 kWh/du/year	3,144.7
	Retail	5,000 sf	13.55 kWh/sf/year	185.6
87	Live/Work Condominiums	132 du	5,626.5 kWh/du/year	2,034.8
88	Condominiums	330 du	5,626.5 kWh/du/year	5,087
	Retail	2,800 sf	13.55 kWh/sf/year	103.9
	Restaurant	9,200 sf	47.45 kWh/sf/year	1,196
	Health Club[1]	56,200 sf	10.5 kWh/sf/year	1,616.7
89	Condominiums	240 du	5,626.5 kWh/du/year	3,699.6
90	Condominiums	222 du	5,626.5 kWh/du/year	3,422.2
91	Condominiums	198 du	5,626.5 kWh/du/year	3,052.2
92	Office	960,000 sf	12.95 kWh/sf/year	34,060.3
	Retail	100,000 sf	13.55 kWh/sf/year	3,712.3
93	Condominiums	331 du	5,626.5 kWh/du/year	5,102.4
	Retail	10,000 sf	13.55 kWh/sf/year	371.2
	Restaurant	5,985 sf	47.45 kWh/sf/year	778.1
94	Condominiums	1,648 du	5,626.5 kWh/du/year	25,404
	Apartments	412 du	5,626.5 kWh/du/year	6,351

Table IV-29
Estimated Cumulative Electricity Demand

Related Project No.	Land Use	Size	Consumption Rate (kWh/du or sf/year)[a]	Electricity Demand (kWh/du or sf/day)
	County Office Building	681,000 sf	12.95 kWh/sf/year	24,161.5
	Retail/Restaurant/ Supermarket/Healthclub[3]	449,000 sf	47.45 kWh/sf/year	58,370
	Hotel	275 rooms	9.95 kWh/sf/year	n/a
95	Condominiums	300 du	5,626.5 kWh/du/year	4,624.5
	Retail	34,000 sf	13.55 kWh/sf/year	1,262.2
96	Condominiums	118 du	5,626.5 kWh/du/year	1,819
97	Condominiums	297 du	5,626.5 kWh/du/year	4,578.3
98	Condominiums	168 du	5,626.5 kWh/du/year	2,589.7
99	Condominiums	250 du	5,626.5 kWh/du/year	3,853.8
	Retail	7,283 sf	13.55 kWh/sf/year	270.4
100	Condominiums	190 du	5,626.5 kWh/du/year	2,928.9
101	Condominiums	550 du	5,626.5 kWh/du/year	8,479.3
102	Retail	100,000 sf	13.55 kWh/sf/year	3,712.3
103	Office	930,000 sf	12.95 kWh/sf/year	32,995.9
104	Condominiums	407 du	5,626.5 kWh/du/year	6,273.9
	Retail	7,472 sf	13.55 kWh/sf/year	277.4
105	Condominiums	334 du	5,626.5 kWh/du/year	5,148.6
	Retail	10,000 sf	13.55 kWh/sf/year	371.2
106	Condominiums	190 du	5,626.5 kWh/du/year	2,928.9
107	Condominiums	130 du	5,626.5 kWh/du/year	2004
	Retail	7,030 sf	13.55 kWh/sf/year	261
108	Condominiums	420 du	5,626.5 kWh/du/year	6,474.3
109	Condominiums	220 du	5,626.5 kWh/du/year	3,391.3
110	Apartments	600 du	5,626.5 kWh/du/year	9,249
	Retail	30,000 sf	13.55 kWh/sf/year	1,113.7
111	Condominiums	210 du	5,626.5 kWh/du/year	3,237.2
	Retail	9,000 sf	13.55 kWh/sf/year	334.1
112	Condominiums	400 du	5,626.5 kWh/du/year	6,166
	Retail	20,000 sf	13.55 kWh/sf/year	742.5
113	Condominiums	425 du	5,626.5 kWh/du/year	6,551.4
	Apartments	425 du	5,626.5 kWh/du/year	6,551.4
114	Wholesale Market	78,972 sf	13.55 kWh/sf/year	2,931.7
115	Condominiums	420 du	5,626.5 kWh/du/year	6,474.3
	Retail	40,000 sf	13.55 kWh/sf/year	1,484.9
116	Condominiums	272 du	5,626.5 kWh/du/year	4,192.9
	Retail	6,431 sf	13.55 kWh/sf/year	238.7
	Restaurant	8,000 sf	47.45 kWh/sf/year	1,040
117	Condominiums	622 du	5,626.5 kWh/du/year	9,588.2
118	Condominiums	186 du	5,626.5 kWh/du/year	2,867.2
	Retail	6,200 sf	13.55 kWh/sf/year	230.2
119	Condominiums	102 du	5,626.5 kWh/du/year	1,572.3
120	Condominiums	96 du	5,626.5 kWh/du/year	1,479.9
	Retail	7,800 sf	13.55 kWh/sf/year	289.6
121	Condominiums	159 du	5,626.5 kWh/du/year	2,451
	Restaurant	6,827 sf	47.45 kWh/sf/year	887.5
122	Gratts Primary School	380 seats	5.9 kWh/sf/year	n/a

Table IV-29
Estimated Cumulative Electricity Demand

Related Project No.	Land Use	Size	Consumption Rate (kWh/du or sf/year)[a]	Electricity Demand (kWh/du or sf/day)
		176 st	5.9 kWh/sf/year	n/a
123	Condominiums	96 du	5,626.5 kWh/du/year	1,479.9
	Hotel	122 rooms	9.95 kWh/sf/year	n/a
	Retail	15,000 sf	13.55 kWh/sf/year	556.8
124	Wholesale	309,000 sf	13.55 kWh/sf/year	11,471.1
125	Wholesale	182,000 sf	13.55 kWh/sf/year	6,756.4
126	Condominiums	318 du	5,626.5 kWh/du/year	4,902
127	Condominiums	160 du	5,626.5 kWh/du/year	2,466.4
128	Condominiums	131 du	5,626.5 kWh/du/year	2,019.4
129	High-Rise Condominiums	96 du	5,626.5 kWh/du/year	1,479.9
	Hotel	122 rooms	9.95 kWh/sf/year	n/a
	Restaurant/Retail[3]	10,000 sf	47.45 kWh/sf/year	1,300
130	Apartments	92 du	5,626.5 kWh/du/year	1,418.2
	Retail	24,250 sf	13.55 kWh/sf/year	900.2
	Office	24,250 sf	12.95 kWh/sf/year	860.4
131	Condominiums	353 du	5,626.5 kWh/du/year	5,441.5
	Retail	18,900 sf	13.55 kWh/sf/year	701.6
	Restaurant	6,000 sf	47.45 kWh/sf/year	780
132	Condominiums	150 du	5,626.5 kWh/du/year	2,312.3
133	Light Industry[1]	3,204,887 sf	10.5 kWh/sf/year	92,195.4
	Restaurant	1,450 sf	47.45 kWh/sf/year	188.5
	Wholesale	23,468 sf	13.55 kWh/sf/year	871.2
134	High-Rise Condominiums	777 du	5,626.5 kWh/du/year	11,977.5
	Specialty Retail	25,000 sf	13.55 kWh/sf/year	928.1
			Related Projects Total	*1,333,140.2*
			Proposed Project Total	*2,158.1*
			Cumulative Total	***1,335,298.3***

Notes: du = dwelling uni; sf = square feet; kWh = kilowatt-hours
[1] Calculation assumes "miscellaneous" generation rate.
[2] Calculation assumes "office" generation rate.
[3] Calculation assumes "restaurant" generation rate for a conservative analysis.
Source (generation rates): SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.
Source (related projects): The Mobility Group, March 2009.
Source (table): Christopher A. Joseph & Associates, May 2009.

Future development projects within the service area of LADWP would be subject to the locally mandated energy conservation programs. While LADWP had indicated that it would be able to accommodate the proposed Project's demand for electricity service with existing electricity supplies, the cumulative effect of the proposed Project and other new and added loads will require near term and/or future additions to the distribution system capacity. Related projects would be required to implement energy conservation measures meeting or exceeding Title 24 standards. These would be stricture energy conservation standards than prior construction. Accordingly, since most of the related projects would be infill redevelopment of sites with preexisting construction, it is likely that any increase in electricity demand would be counter-balanced by the conservation standards required of new construction. As such, the

proposed Project would not contribute to a cumulatively considerable effect on electricity generation or infrastructure. Therefore, impacts would be less than significant and no mitigation measures are required.

Natural Gas

The Southern California Gas Company (the Gas Company) provides natural gas to the City of Los Angeles through existing gas mains located under the streets. Natural gas is provided in accordance with the Gas Company's policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made. The State of California produces about 16 percent of the natural gas it uses. The remaining natural gas is obtained from sources outside the State, including the Southwest, Canada, and the Rocky Mountain area. The predicted availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, the Gas Company is under the jurisdiction of the CPUC, but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which the service is available, gas service would be provided in accordance with those revised conditions.

The Project site is currently developed, with existing gas mains connecting the Project site to the natural gas system. As shown in Table IV-30, Existing Natural Gas Demand, natural gas consumption associated with the existing uses on the Project site is estimated at approximately 54,809 cubic feet per month (cfm).

Table IV-30
Existing Natural Gas Demand

Land Use	Size (du)	Consumption Rate (cubic feet/du/month)	Total (cubic feet/month)
Single-Family Residential	1	6,665	6,665
Multi-Family Residential	12	4,012	48,144
		Total	***54,809***

Notes:
du = dwelling unit
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.

The proposed Project would consume approximately 613,836 cfm of natural gas[150]. This is an increase of approximately 559,027 cfm over the existing uses on the Project site. However, as indicated by the Gas Company, natural gas service to the proposed Project could be served without any significant impact. Any natural gas facility additions would be in accordance with the Gas Company's policies and extension rules on file with the California Public Utilities Commission at the time contractual agreements are made.[151] As noted in Response 1(d), the Project is proposing to improve upon Title 24 energy efficiency

[150] *153 units * 4,012 cubic feet/du/month = 613,836 cfm*

[151] *Southern California Gas Company, Gayle Jovoni, Planning Associate, response to service letter, July 25, 2008.*

standards by 14 percent. The incorporation of energy conservation measures would lessen the Project's impact on natural gas.

Implementation of the proposed Project would not require new (off-site) energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities. Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Implementation of the proposed Project in combination with the 134 related projects listed in Table II-1, Related Projects, in Section II, Project Description, of this Initial Study and other future cumulative growth in the City would increase the consumption of natural gas. This projected cumulative increase in natural gas consumption would be up to approximately 102,250,020 cubic feet per month (cfm), or 102 million cfm (mcfm), as shown in Table IV-31, Estimated Cumulative Natural Gas Demand. Coupled with other potential growth within the service area of the Gas Company, additional cumulative increases in demand for natural gas could occur.

Table IV-31
Estimated Cumulative Natural Gas Demand

Related Project No.	Land Use	Size	Consumption Rate (cubic feet/du or sf/month)	Total (cubic feet/month)
1	Community Building	32,000 sf	3 cubic feet/sf/month	96,000
	Performing Arts	25,000 sf	3 cubic feet/sf/month	75,000
	Plaza House	14,100 sf	3 cubic feet/sf/month	42,300
	Educational Center & Museum	23,700 sf	3 cubic feet/sf/month	71,100
2	Artist-in-lofts	30 du	4,012 cubic feet/du/month	120,360
	Retail	5,000 sf	3 cubic feet/sf/month	15,000
	Office	20,000 sf	2 cubic feet/sf/month	40,000
3	Apartments	87 du	4,012 cubic feet/du/month	349,044
	Commercial	70,231 sf	3 cubic feet/sf/month	210,693
4	Office	5,432 sf	2 cubic feet/sf/month	10,864
	Uniform Sales Store	7,168 sf	3 cubic feet/sf/month	21,504
5	Grocery	40,000 sf	3 cubic feet/sf/month	120,000
	Retail	30,000 sf	3 cubic feet/sf/month	90,000
	Community Facility	40,000 sf	3 cubic feet/sf/month	120,000
6	Condominiums	105 du	4,012 cubic feet/du/month	421,260
	Retail	4,500 sf	3 cubic feet/sf/month	13,500
7	Apartments	21 du	4,012 cubic feet/du/month	84,252
8	Condominiums	460 du	4,012 cubic feet/du/month	1,845,520
9	Apartments	102 du	4,012 cubic feet/du/month	409,224
	Retail	4,212 sf	3 cubic feet/sf/month	12,636
10	Apartments	110 du	4,012 cubic feet/du/month	441,320
11	Apartments	600 du	4,012 cubic feet/du/month	2,407,200
	Retail	20,000 sf	3 cubic feet/sf/month	60,000
12	Affordable Apartments	75 du	4,012 cubic feet/du/month	300,900
13	Office Condominiums	135 du	4,012 cubic feet/du/month	541,620

Table IV-31
Estimated Cumulative Natural Gas Demand

Related Project No.	Land Use	Size	Consumption Rate (cubic feet/du or sf/month)	Total (cubic feet/month)
	Live/Work Condominiums	402 du	4,012 cubic feet/du/month	1,612,824
14	Apartments	261 du	4,012 cubic feet/du/month	1,047,132
	Specialty Retail	6,398 sf	3 cubic feet/sf/month	19,194
15	Condominiums	629 du	4,012 cubic feet/du/month	2,643,908
	Retail	27,000 sf	3 cubic feet/sf/month	81,000
16	Condominiums	54 du	4,012 cubic feet/du/month	96,288
17	Office	880,000 sf	2 cubic feet/sf/month	1,760,000
18	Auto Sales & Parking Lot	25,880 sf	3 cubic feet/sf/month	77,640
19	Apartments	65 du	4,012 cubic feet/du/month	260,780
20	Imageing Center, Pharmacy, Surgical Suites & Physician Offices	150,000 sf	2 cubic feet/sf/month	300,000
21	Apartments	84 du	4,012 cubic feet/du/month	337,008
22	Performing Arts High School	64 classrooms	n/a	n/a
	Performing Arts Theater	1,600 seats	n/a	n/a
23	Apartments	210 du	4,012 cubic feet/du/month	842,520
	Retail	10,966 sf	3 cubic feet/sf/month	32,898
24	Condominiums	311 du	4,012 cubic feet/du/month	1,247,732
	Retail	7,294 sf	3 cubic feet/sf/month	21,882
25	Apartments	725 du	4,012 cubic feet/du/month	2,908,700
	Retail	39,999 sf	3 cubic feet/sf/month	119,997
26	Apartments	70 du	4,012 cubic feet/du/month	280,840
27	U.S. District Courtrooms	41 courtrooms	n/a	n/a
	Judges Chambers	40 chambers	n/a	n/a
	Support Offices	n/a	2 cubic feet/sf/month	n/a
	Circuit Satellite Library	n/a	n/a	n/a
	Parking	150 spaces	n/a	n/a
28	Hotel	80 rooms	5 cubic feet/sf/month	n/a
	Condo Hotel	112 du	4,012 cubic feet/du/month	449,344
	Condominiums	165 du	4,012 cubic feet/du/month	661,980
	Retail	7,500 sf	3 cubic feet/sf/month	22,500
	Restaurant	13,000 sf	3 cubic feet/sf/month	39,000
29	Condominiums	875 du	4,012 cubic feet/du/month	3,510,500
	Retail	34,061 sf	3 cubic feet/sf/month	102,183
	Restaurants	10,000 sf	3 cubic feet/sf/month	30,000
30	Loft Apartments	209 du	4,012 cubic feet/du/month	838,508
31	5-year Master Plan Project	n/a	n/a	n/a
32	Residential Lofts	n/a	4,012 cubic feet/du/month	n/a
	Retail	n/a	3 cubic feet/sf/month	n/a
33	Office	25,500 sf	2 cubic feet/sf/month	51,000
	Exam Facility	50 visitors	2 cubic feet/sf/month	n/a
	Conference Facility	350 visitors	2 cubic feet/sf/month	n/a
34	High-Rise Condominiums	132 du	4,012 cubic feet/du/month	529,584
	Condominiums	73 du	4,012 cubic feet/du/month	292,876
	Apartments	46 du	4,012 cubic feet/du/month	184,552
	Retail	19,103 sf	3 cubic feet/sf/month	57,309

Table IV-31
Estimated Cumulative Natural Gas Demand

Related Project No.	Land Use	Size	Consumption Rate (cubic feet/du or sf/month)	Total (cubic feet/month)
35	Office	8,200,000 sf	2 cubic feet/sf/month	16,400,000
	Hotel	750 rooms	5 cubic feet/sf/month	n/a
	Apartments	300 du	4,012 cubic feet/du/month	1,203,600
	Retail	250,000 sf	3 cubic feet/sf/month	750,000
	Museum	70,000 sf	3 cubic feet/sf/month	210,000
36	Loft Apartments	300 du	4,012 cubic feet/du/month	1,203,600
37	Multi-Use Development	596,000 sf	3 cubic feet/sf/month	1,788,000
38	Apartments	124 du	4,012 cubic feet/du/month	497,488
	Retail	12,500 sf	3 cubic feet/sf/month	37,500
39	EOC/POC/FDC	433 emp	2 cubic feet/sf/month	n/a
	Metro Jail	512 beds	2 cubic feet/sf/month	n/a
	Occupational Health & Services Div. (OHSD)	30,000 sf	2 cubic feet/sf/month	60,000
	Fire Station #4	21 emp	2 cubic feet/sf/month	n/a
40	Apartments	444 du	4,012 cubic feet/du/month	1,781,328
	Retail	30,650 sf	3 cubic feet/sf/month	91,950
41	Condominiums	130 du	4,012 cubic feet/du/month	521,560
	Apartments	250 du	4,012 cubic feet/du/month	1,003,000
	Supermarket	30,000 sf	3 cubic feet/sf/month	90,000
	High Turnover Restaurant	150,000 sf	3 cubic feet/sf/month	450,000
	Retail	200,000 sf	3 cubic feet/sf/month	600,000
42	Loft Apartments	157 du	4,012 cubic feet/du/month	629,884
43	Police Headquarters Facility (PHF)	2,400 emp	2 cubic feet/sf/month	n/a
	Motor Transport Division (MTD)	56 emp	2 cubic feet/sf/month	n/a
	Recreation Center	60,000 sf	3 cubic feet/sf/month	180,000
	Aiso St. Parking Facility	300 spaces	n/a	n/a
44	Restaurant	13,921 sf	3 cubic feet/sf/month	41,763
	Retail	726 sf	3 cubic feet/sf/month	2,178
	Pool/Event	726 sf	3 cubic feet/sf/month	2,178
45	Elementary School	875 st	n/a	n/a
46	Apartments	280 du	4,012 cubic feet/du/month	1,123,360
	Retail	22,000 sf	3 cubic feet/sf/month	66,000
47	Live/Work Lofts	91 du	4,012 cubic feet/du/month	365,092
48	Condominiums	80 du	4,012 cubic feet/du/month	320,960
	Apartments	299 du	4,012 cubic feet/du/month	1,199,588
49	Lofts	82 du	4,012 cubic feet/du/month	328,984
50	Congregate Care Facility	200 du	4,012 cubic feet/du/month	802,400
51	Apartments	20 du	4,012 cubic feet/du/month	80,240
	Office	32,670 sf	2 cubic feet/sf/month	65,340
	Retail	37,600 sf	3 cubic feet/sf/month	112,800
	Condominiums	565 du	4,012 cubic feet/du/month	2,266,780
52	Live/Work Condominiums	190 du	4,012 cubic feet/du/month	762,280
	Retail	5,540 sf	3 cubic feet/sf/month	16,620
53	Condominiums	223 du	4,012 cubic feet/du/month	894,676
	Cultural Center	7,000 sf	3 cubic feet/sf/month	21,000

Table IV-31
Estimated Cumulative Natural Gas Demand

Related Project No.	Land Use	Size	Consumption Rate (cubic feet/du or sf/month)	Total (cubic feet/month)
	Restaurant	15,000 sf	3 cubic feet/sf/month	45,000
	Retail	22,008 sf	3 cubic feet/sf/month	66,024
54	Condominiums	93 du	4,012 cubic feet/du/month	373,116
55	Restaurant	11,018 sf	3 cubic feet/sf/month	33,054
	Retail	8,927 sf	3 cubic feet/sf/month	17,854
	Health Club	5,066 sf	3 cubic feet/sf/month	15,198
56	Hall of Justice	30 emp	2 cubic feet/sf/month	n/a
	Parking Structure	1,000 spaces (50,000 sf)	n/a	n/a
57	Condominiums	55 du	4,012 cubic feet/du/month	220,60
	Retail	28,000 sf	3 cubic feet/sf/month	84,000
58	Entertainment	33,423 sf	3 cubic feet/sf/month	100,296
59	Hotel	1,200 rooms	5 cubic feet/sf/month	n/a
	Cinema	3,600 seats	3 cubic feet/sf/month	n/a
	Theatre	7,000 seats	3 cubic feet/sf/month	n/a
	Restaurants	345,000 sf	3 cubic feet/sf/month	n/a
	Retail	498,000 sf	3 cubic feet/sf/month	1,494,000
	Office	165,000 sf	2 cubic feet/sf/month	330,000
	Apartments	800 du	4,012 cubic feet/du/month	3,209,600
60	Hotel	480 rooms	5 cubic feet/sf/month	n/a
	Condominiums	836 du	4,012 cubic feet/du/month	3,354,032
	Office	988,225 sf	2 cubic feet/sf/month	1,976,450
	Retail	46,000 sf	3 cubic feet/sf/month	138,000
61	Condominiums	118 du	4,012 cubic feet/du/month	473,416
	Retail	3,000 sf	3 cubic feet/sf/month	9,000
62	Condominiums	273 du	4,012 cubic feet/du/month	1,095,276
	Retail	18,000 sf	3 cubic feet/sf/month	54,000
63	Condominiums	464 du	4,012 cubic feet/du/month	1,861,568
	Retail	25,000 sf	3 cubic feet/sf/month	75,000
64	Condominiums	39 du	4,012 cubic feet/du/month	156,468
65	Live/Work Lofts with Restaurant/Bar	78 du	4,012 cubic feet/du/month	312,936
66	Condominiums	247 du	4,012 cubic feet/du/month	990,964
	Retail	10,675 sf	3 cubic feet/sf/month	32,025
67	Condominiums	939 du	4,012 cubic feet/du/month	3,767,268
	Retail/Restaurant	83,700 sf	3 cubic feet/sf/month	251,100
68	Apartments	363 du	4,012 cubic feet/du/month	1,456,356
	Retail	7,740 sf	3 cubic feet/sf/month	23,220
69	Condominiums	351 du	4,012 cubic feet/du/month	1,408,212
	Retail	125,000 sf	3 cubic feet/sf/month	375,000
	Restaurant	125,000 sf	3 cubic feet/sf/month	375,000
70	Condominiums	128 du	4,012 cubic feet/du/month	513,536
	Retail	3,472 sf	3 cubic feet/sf/month	10,416
	Restaurant	2,200 sf	3 cubic feet/sf/month	6,600
71	Condominiums	225 du	4,012 cubic feet/du/month	902,700
	Hotel	200 rooms	5 cubic feet/sf/month	n/a
	Retail	30,000 sf	3 cubic feet/sf/month	90,000

Table IV-31
Estimated Cumulative Natural Gas Demand

Related Project No.	Land Use	Size	Consumption Rate (cubic feet/du or sf/month)	Total (cubic feet/month)
	Restaurant	32,000 sf	3 cubic feet/sf/month	96,000
72	Condominiums	311 du	4,012 cubic feet/du/month	1,247,732
73	Bar/Lounge	8,770 sf	3 cubic feet/sf/month	26,310
74	Condominiums	300 du	4,012 cubic feet/du/month	1,203,600
75	Condominiums	172 du	4,012 cubic feet/du/month	690,064
	Retail	6,850 sf	3 cubic feet/sf/month	20,550
76	Condominiums	130 du	4,012 cubic feet/du/month	521,560
	Retail	7,037 sf	3 cubic feet/sf/month	21,111
77	Supermarket	17,000 sf	3 cubic feet/sf/month	51,000
	Retail	4,200 sf	3 cubic feet/sf/month	12,600
78	Condominiums	84 du	4,012 cubic feet/du/month	337,008
	Bar	6,000 sf	3 cubic feet/sf/month	18,000
79	Condominiums	570 du	4,012 cubic feet/du/month	2,286,840
	Apartments	280 du	4,012 cubic feet/du/month	1,123,360
	Retail	50,000 sf	3 cubic feet/sf/month	150,000
80	Apartments (Ph 1)	90 du	4,012 cubic feet/du/month	361,080
	Retail (Ph 1)	15,500 sf	3 cubic feet/sf/month	46,500
	Apartments (Ph 2)	82 du	4,012 cubic feet/du/month	328,984
	Retail (Ph 2)	17,300 sf	3 cubic feet/sf/month	51,900
81	High School	1,206 st	n/a	n/a
82	Gas Station with Canopy & Mini-Market (Reconstruct)	2,046 sf	3 cubic feet/sf/month	6,138
	Gas Station with Canopy & Mini-Market (Demolish)	*2,044 sf*	*3 cubic feet/sf/month*	*-6,132*
83	Condominiums	900 du	4,012 cubic feet/du/month	3,610,800
	Retail	19,000 sf	3 cubic feet/sf/month	57,000
	Restaurant	19,200 sf	3 cubic feet/sf/month	57,600
84	Apartments	74 du	4,012 cubic feet/du/month	296,888
85	Condominiums	213 du	4,012 cubic feet/du/month	854,556
	Retail	9,500 sf	3 cubic feet/sf/month	28,500
86	Apartments	204 du	4,012 cubic feet/du/month	818,448
	Retail	5,000 sf	3 cubic feet/sf/month	15,000
87	Live/Work Condominiums	132 du	4,012 cubic feet/du/month	529,584
88	Condominiums	330 du	4,012 cubic feet/du/month	1,323,960
	Retail	2,800 sf	3 cubic feet/sf/month	8,400
	Restaurant	9,200 sf	3 cubic feet/sf/month	27,600
	Health Club	56,200 sf	3 cubic feet/sf/month	168,600
89	Condominiums	240 du	4,012 cubic feet/du/month	962,880
90	Condominiums	222 du	4,012 cubic feet/du/month	890,664
91	Condominiums	198 du	4,012 cubic feet/du/month	794,376
92	Office	960,000 sf	2 cubic feet/sf/month	1,920,000
	Retail	100,000 sf	3 cubic feet/sf/month	300,000
93	Condominiums	331 du	4,012 cubic feet/du/month	1,327,972
	Retail	10,000 sf	3 cubic feet/sf/month	30,000
	Restaurant	5,985 sf	3 cubic feet/sf/month	17,955

Table IV-31
Estimated Cumulative Natural Gas Demand

Related Project No.	Land Use	Size	Consumption Rate (cubic feet/du or sf/month)	Total (cubic feet/month)
94	Condominiums	1,648 du	4,012 cubic feet/du/month	6,611,776
	Apartments	412 du	4,012 cubic feet/du/month	1,652,944
	County Office Building	681,000 sf	2 cubic feet/sf/month	1,362,000
	Retail/Restaurant/ Supermarket/Healthclub[2]	449,000 sf	3 cubic feet/sf/month	1,347,000
	Hotel	275 rooms	5 cubic feet/sf/month	n/a
95	Condominiums	300 du	4,012 cubic feet/du/month	1,203,600
	Retail	34,000 sf	3 cubic feet/sf/month	102,000
96	Condominiums	118 du	4,012 cubic feet/du/month	473,416
97	Condominiums	297 du	4,012 cubic feet/du/month	1,191,564
98	Condominiums	168 du	4,012 cubic feet/du/month	674,016
99	Condominiums	250 du	4,012 cubic feet/du/month	1,003,000
	Retail	7,283 sf	3 cubic feet/sf/month	21,849
100	Condominiums	190 du	4,012 cubic feet/du/month	762,280
101	Condominiums	550 du	4,012 cubic feet/du/month	2,206,600
102	Retail	100,000 sf	3 cubic feet/sf/month	300,000
103	Office	930,000 sf	2 cubic feet/sf/month	1,860,000
104	Condominiums	407 du	4,012 cubic feet/du/month	1,632,884
	Retail	7,472 sf	3 cubic feet/sf/month	22,416
105	Condominiums	334 du	4,012 cubic feet/du/month	1,340,008
	Retail	10,000 sf	3 cubic feet/sf/month	30,000
106	Condominiums	190 du	4,012 cubic feet/du/month	762,280
107	Condominiums	130 du	4,012 cubic feet/du/month	521,560
	Retail	7,030 sf	3 cubic feet/sf/month	21,090
108	Condominiums	420 du	4,012 cubic feet/du/month	1,685,040
109	Condominiums	220 du	4,012 cubic feet/du/month	882,640
110	Apartments	600 du	4,012 cubic feet/du/month	2,407,200
	Retail	30,000 sf	3 cubic feet/sf/month	90,000
111	Condominiums	210 du	4,012 cubic feet/du/month	842,520
	Retail	9,000 sf	3 cubic feet/sf/month	27,000
112	Condominiums	400 du	4,012 cubic feet/du/month	1,604,800
	Retail	20,000 sf	3 cubic feet/sf/month	60,000
113	Condominiums	425 du	4,012 cubic feet/du/month	1,705,100
	Apartments	425 du	4,012 cubic feet/du/month	1,705,100
114	Wholesale Market	78,972 sf	3 cubic feet/sf/month	236,916
115	Condominiums	420 du	4,012 cubic feet/du/month	1,685,040
	Retail	40,000 sf	3 cubic feet/sf/month	120,000
116	Condominiums	272 du	4,012 cubic feet/du/month	1,091,264
	Retail	6,431 sf	3 cubic feet/sf/month	19,293
	Restaurant	8,000 sf	3 cubic feet/sf/month	24,000
117	Condominiums	622 du	4,012 cubic feet/du/month	2,495,464
118	Condominiums	186 du	4,012 cubic feet/du/month	746,232
	Retail	6,200 sf	3 cubic feet/sf/month	18,600
119	Condominiums	102 du	4,012 cubic feet/du/month	409,224
120	Condominiums	96 du	4,012 cubic feet/du/month	385,152
	Retail	7,800 sf	3 cubic feet/sf/month	23,400
121	Condominiums	159 du	4,012 cubic feet/du/month	637,908

Table IV-31
Estimated Cumulative Natural Gas Demand

Related Project No.	Land Use	Size	Consumption Rate (cubic feet/du or sf/month)	Total (cubic feet/month)
	Restaurant	6,827 sf	3 cubic feet/sf/month	20,481
122	Gratts Primary School	380 seats	n/a	n/a
		176 st	n/a	n/a
123	Condominiums	96 du	4,012 cubic feet/du/month	385,152
	Hotel	122 rooms	5 cubic feet/sf/month	n/a
	Retail	15,000 sf	3 cubic feet/sf/month	45,000
124	Wholesale	309,000 sf	3 cubic feet/sf/month	927,000
125	Wholesale	182,000 sf	3 cubic feet/sf/month	546,000
126	Condominiums	318 du	4,012 cubic feet/du/month	1,275,816
127	Condominiums	160 du	4,012 cubic feet/du/month	641,920
128	Condominiums	131 du	4,012 cubic feet/du/month	525,572
129	High-Rise Condominiums	96 du	4,012 cubic feet/du/month	385,152
	Hotel	122 rooms	5 cubic feet/sf/month	n/a
	Restaurant/Retail	10,000 sf	3 cubic feet/sf/month	30,000
130	Apartments	92 du	4,012 cubic feet/du/month	369,104
	Retail	24,250 sf	3 cubic feet/sf/month	72,750
	Office	24,250 sf	2 cubic feet/sf/month	48,500
131	Condominiums	353 du	4,012 cubic feet/du/month	1,416,236
	Retail	18,900 sf	3 cubic feet/sf/month	56,700
	Restaurant	6,000 sf	3 cubic feet/sf/month	18,000
132	Condominiums	150 du	4,012 cubic feet/du/month	40,120
133	Light Industry	3,204,887 sf	2,929,600 cubic feet/parcel/month	n/a
	Restaurant	1,450 sf	3 cubic feet/sf/month	4,350
	Wholesale	23,468 sf	3 cubic feet/sf/month	70,404
134	High-Rise Condominiums	777 du	4,012 cubic feet/du/month	3,117,324
	Specialty Retail	25,000 sf	3 cubic feet/sf/month	75,000
			Related Projects Total	*101,636,184*
			Proposed Project Total	*613,836*
			Cumulative Total	***102,250,020***

Notes: sf = square feet; du = dwelling unit; st = students
Source (generation rates): SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.
Source (related projects): The Mobility Group, March 2009.
Source (table): Christopher A. Joseph & Associates, May 2009.

Future development projects within the service area of the Gas Company would be subject to the locally mandated energy conservation programs. As with the proposed Project, the Gas Company already serves most of these sites because they are infill/redevelopment projects. Any natural gas facility additions would be in accordance with the Gas Company's policies and extension rules on file with the California Public Utilities Commission at the time contractual agreements are made.[152] Related projects would be required to implement energy conservation measures meeting or exceeding Title 24 standards. These

[152] *Southern California Gas Company, Gayle Jovoni, Planning Associate, response to service letter, July 25, 2008.*

would be stricture energy conservation standards than prior construction. Accordingly, since most of the related projects would be infill redevelopment of sites with preexisting construction, it is likely that any increase in electricity demand would be counter-balanced by the conservation standards required of new construction. As such, the proposed Project would not contribute to a cumulatively considerable effect on natural gas supplies and infrastructure. Therefore, impacts would be less than significant and no mitigation measures are required.

17. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. Based on the analysis contained in this Environmental Impact Analysis, with the implementation of identified mitigation measures, where applicable, the proposed project would not degrade the quality of the environment and the project does not have the potential for significant environmental impacts. Specifically, as discussed under Question 4(a) through (e), the proposed project would not reduce or threaten any fish or wildlife species (endangered or otherwise). Furthermore, as discussed under Question 5(a) through (d), the proposed project would not eliminate important examples of the major periods of California history or pre-history, nor do the impacts have the potential to degrade the environment. 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. 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 are less than significant when viewed separately, but would be significant when viewed together. The proposed Project would not combine with the 134 related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in this Initial Study (see "Cumulative Impacts" subheadings throughout this Environmental Impact Analysis).

In particular, the proposed Project and related projects are anticipated to comply with applicable federal, State, and City regulations that would preclude significant cumulative impacts with regard to geology and soils, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic. Compliance with City design standards would ensure that any cumulative impacts related to aesthetics and land use planning would be less than significant. Furthermore, an increase in area

populations and employment resulting from the proposed project and related projects are anticipated to be within City forecasts; therefore, less than significant cumulative impacts to population and housing are anticipated. Similarly, the demands on public services such as fire protection, police protection, schools, parks, recreation, and solid waste generation resulting from the proposed project and related projects would be less than significant with the application of the standard mitigation measures identified above with regard to the proposed project. Lastly, as service providers conduct ongoing evaluations to ensure facilities are adequate to serve the forecasted growth of the community, cumulative impacts on utilities are concluded to be less than significant. Therefore, the proposed Project's incremental 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. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this Environmental Impact Analysis, with implementation of the recommended mitigation measures, the proposed Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

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V. PREPARERS OF THE INITIAL STUDY AND PERSONS CONSULTED

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David Benjamin, Graphics Specialist
Amy Parravano, Biologist
Michael Brown, Noise Specialist
Bryan Chen, Air Quality Specialist

Traffic Consultant

The Mobility Group
18301 Von Karman
Irvine, California 92612
(949) 474-1591
Michael Bates, President
Eric Ji, Transportation Engineer

Architect

PSL Architects
1657 Alvira Street
Los Angeles, CA 90035
(323) 954-9996
Mark Lahmon, Principal
Andrew Crane, Project Architect

Land Use Consultant

Craig Lawson & Co., LLC
8758 Venice Boulevard, Suite 200
Los Angeles, CA 90034
(310) 838-2400
Jim Ries
Alex Irvine

Civil Engineer

Hall & Foreman - LA / Ventura Division
20950 Warner Center Lane, Suite A
Woodland Hills, CA 91367
(818) 251-1200
Jerry Veluhakis
Alex Moore

Geotechnical Consultants

Geotechnologies, Inc.
439 Western Avenue
Glendale, California 91201
(818) 240-9600
Reinard T. Knur, G.E., C.E.G.

Public Services and Utilities Agencies Consulted

Transportation Services

City of Los Angeles Department of Transportation
100 S. Main St., 10th Floor
Los Angeles, California 90012
(213) 367-8470
Tomas Carranza, Senior Transportation Engineer

Electricity Services

City of Los Angeles Department of Water and Power
Distribution Planning
111 North Hope Street, Room 1044
Los Angeles, California 90012
(213) 367-0610
Charles Holloway, Supervisor of Environmental Assessment
Shilpa Gupta, Environmental Specialist

Fire Protection Services

City of Los Angeles Fire Department
Bureau of Fire Protection
Hydrants and Access / Construction Services
221 North Figueroa Street, Suite 1500
Los Angeles, California 90012
(213) 482-6536
Captain Frank K. Comfort, Captain I-Hydrants and Access Unit

City of Los Angeles Fire Department
Planning Section
200 North Main Street, Suite 1800
Los Angeles, CA 90012
(213) 978-3845
Captain William N. Wells, Captain II-Paramedic

Library Services

City of Los Angeles Public Library
Library Facilities Division
630 West Fifth Street
Los Angeles, California 90071
(213) 228-7515
Juliana Cheng, Director
Rona Berns, Senior Management Analyst

Natural Gas Services

The Southern California Gas Company
P.O. Box 90024
Compton, California 90224
(310) 687-2037
Gayle Jovoni, Planning Associate

Parks and Recreation Facilities

City of Los Angeles Department of Recreation and Parks
Planning and Development Division
1200 West 7th Street, Suite 700 (MS 682)
Los Angeles, CA 90017
(213) 928-9191
Michael A. Shull, Superintendent
Jon Kirk Mukri, General Manager

Police Protection Services

City of Los Angeles Police Department
Community Relations Section, Crime Prevention Unit
Office of the Chief of Police
150 North Los Angeles Street, Room 611
P.O. Box 30158
Los Angeles, CA 90012
(213) 485-4101
William J. Bratton, Chief of Police
Douglas G. Miller, Lieutenant/Officer in Charge
Marco Jimenez, Officer

School Facilities

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 20th Floor
Los Angeles, CA 90017
(213) 241-3199
Glenn Striegler - PG, Environmental Assessment Coordinator

Los Angeles Unified School District
Facilities Services Division
1055 West 7th Street, 9th Floor
P.O. Box 513307-1307
Los Angeles, CA 90017-2577
(213) 893-6850
Rena Perez, Director (Master Planning and Demographics)

Solid Waste Services

City of Los Angeles Department of Public Works, Bureau of Sanitation
Solid Resources Citywide Recycling Division
1149 South Broadway, 10th Floor
Los Angeles, CA 90015
(213) 485-2260
Mistie M. Joyce, Environmental Specialist II

Water Services

City of Los Angeles Department of Water and Power
Water Distribution Engineering
111 North Hope Street, Room 1044
Los Angeles, California 90012
(213) 367-4114
Mina Abdelshehid, Civil Engineering Associate

Wastewater Services

City of Los Angeles Department of Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
1149 South Broadway Street, 9th Floor
Los Angeles, CA 90015
(213) 485-2210
Brent Lorscheider, Acting Division Manager

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
AND
6262 VAN NUYS BLVD., SUITE 351
VAN NUYS, CA 91401

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YOLANDA OROZCO
MICHAEL K. WOO

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CITY OF LOS ANGELES
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MAYOR

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DEPUTY DIRECTOR
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FAX: (213) 978-1275

INFORMATION
(213) 978-1270

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January 21, 2010

Matthew Sullivan (O)
515 S. Figueroa Street, Suite 1060
Los Angeles, CA 90071

Craig Lawson and Co., LLC (R)
Attention: Jim Reis
8758 Venice Boulevard, Suite 200
Los Angeles, CA 90034

RE: Reconsideration, ENV-2009-2036-MND, APCC-2009-2066-SPE-ZAA-ZAD-SPP;
1416-1430 West Beverly Boulevard

Pursuant to Section 15164 of the State California Environmental Quality Act (CEQA) Guidelines, the Department of City Planning has issued a Reconsideration of the previously issued Mitigated Negative Declaration (MND), ENV-2009-2036-MND which was published and circulated for a 20-day public comment period and was filed on October 15, 2009 with no public comments.

Subsequent to the original publication, in a letter dated December 16, 2009, the applicant's representative requested a reconsideration of the MND from the Department of City Planning's Expedited Processing Section for the filing of a Reconsideration Case No. ENV-2009-2036-MND-REC1 for revisions to the project description, including a decreased number of units and parking spaces. The Department of City Planning has determined that the previously issued Mitigated Negative Declaration ENV-2009-2036-MND still addresses all areas of potential environmental impacts due to the revised project.

In addition, the Department of Transportation (DOT) issued a memo dated May 27, 2009 that included the analysis of 6 intersections with a determination that none of these intersections would be significantly impacted by the project related traffic. On December 21, 2009, DOT issued another memo with a revised project description that included less units and less parking and determined that the recommended requirements, including driveway access and circulation that were identified in DOT's original letter dated May 27, 2009 shall remain in effect.

The project description is hereby amended to read:

"The demolition of all existing residential and industrial uses on the site to facilitate the proposed construction and maintenance of a two phase 100% affordable project consisting of approximately 120,691 square feet of residential development ("the Project") and approximately 125 residential units located on an approximately 54,900 square foot site. The project consists of two separate buildings - Building A, a 6-story building, reaching 81.5 feet tall, with 68 units within 73,752 square feet of floor area, and Building B, a 5-story building, reaching 77 feet tall, with 57 senior units within 46,939 square feet of floor area. Note each building will contain one non-deed restricted managers unit. The project will provide 97 parking spaces, as required by LAMC sections 12.22.A.25.d.2 and 12.21 A 4 (a), in subterranean parking structures located below each building and 19,417 square feet of open space (such as a courtyards, roof decks, a community room and landscaped yards) in lieu of the 15,100 square feet required. The dual zoned site includes 32,806 square feet of RC4 (CW)-U/3.7 and 22,094 square feet of R4 (CW)-75/3 zoned land. In addition, the applicant has indicated that they will haul approximately 24,089 cubic yards of soil.

Per APCC-2009-2066-SPE-ZAA-ZAD-SPP, the applicant is requesting Pursuant to LAMC Section 11.5.7, a Specific Plan Exception from the Central City West Specific Plan ("CCWSP") to deviate from Section 6.F.3.a.2 of the CCWSP to permit a 68-unit multi-family building without commercial floor area, which is otherwise required within the Specific Plan's RC4 (CW) Zone;

Pursuant to LAMC Section 12.24.X.26, a Zoning Administrator's Determination to deviate from LAMC Section 12.21.C.8.a to provide more than two retaining walls and to build retaining walls with related fencing in excess of the permitted heights including: (1) Build a maximum of 3 retaining walls in lieu of the maximum 2 allowed; (2) Provide retaining walls which exceed the 10-foot permitted height by as much as 8-feet (from natural grade); (3) Provide 8-foot tall fences along the alley frontages of both buildings in lieu of the 6-feet permitted and a front yard fence, associated with Building B, which exceeds the 3 feet 6 inches permitted by 66 inches (24 of which will be a solid wall and the remaining 42 inches consisting of a guardrail).

Also, pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to permit an 8-foot, 2-inch encroachment of an architectural feature from floors 2 through the roof of Building A into the required northerly setback creating a 6-foot, 10-inch yard front yard in lieu of the 15 feet required in the RC4(CW)-U/3.7 and R4(CW) Zones.

Finally, pursuant to Section 17.A.1 of the CCWSP and LAMC Section 11.5.7.C, a Project Permit Compliance Review with the Central City West Specific Plan. In conjunction with the Project Permit Compliance, the Applicant requests

permission to locate 50% (equal to 63) of the required (equal to 125) trees off-site as provided for by Appendix D Section C 2 of the CCWSP.

Pursuant to various sections of the LAMC, the Applicant will request approvals and permits for the Building and Safety Department and other municipal agencies for project construction actions, including but not limited to the following: demolition, excavation, haul route, shoring, grading, foundation, building, and tenant improvements."

The Department of City Planning has determined that the revised project will not create any new substantial impacts beyond what has been previously analyzed in the original environmental clearance and does not represent any increase to the originally proposed project, as defined by the California Environmental Quality Act (CEQA Guidelines). Therefore, pursuant to section 15073.5 of the CEQA Guidelines, recirculation of the MND is not required.

Sincerely,

S. Gail Goldberg
Director
Department of City Planning

Henry Chu
City Planner

SGG:JT:HC:HUL:jq

cc: Owner/Applicant

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	**COUNCIL DISTRICT**
City of Los Angeles	13
PROJECT TITLE	**CASE NO.**
ENV-2009-2036-MND	APCC-2009-2066-SPE-ZAA-ZAD-SPP

PROJECT LOCATION
1416-1430 West Beverly Boulevard and 109-125 1/2 South Lucas Avenue

PROJECT DESCRIPTION
The demolition of all existing residential and industrial uses on the site and the proposed construction, maintenance, and use of a new as a 6-story (up to 87-foot tall), 153-unit multifamily residential project (containing approximately 132,351 square feet of floor area) with 170 parking spaces within three subterranean parking levels, including approximately 15,958 square feet of common and open space amenities (such as a lobby, fitness room, community room, swimming pool, and open space) all on an approximate 54,900 square foot site in the RC4(CW)-U/3.7 Zone and R4(CW) Zone. In addition, the applicant has indicated that they will haul approximately 24,089 cubic yards of soil. Per APCC-2009-2066-SPE-ZAA-ZAD-SPP, the applicant is requesting that Pursuant to LAMC Section 11.5.7, the following Specific Plan Exceptions from the Central City West Specific Plan (CCWSP): (1) From Section 6.F.3.a.2 of the CCWSP to permit a 153-unit multi-family project without commercial floor area, which is otherwise required within the Specific Plan's RC4(CW) Zone; (2) From Section C.1 of Appendix D of the CCWSP and consistent with LAMC Section 11.5.7.F.1 (c) to provide 15,958 square feet of open space as defined by the CCWSP and 12,092 square feet of open space as defined by the LAMC in lieu of the 16,150 square feet of open space required. Also, pursuant to LAMC Section 12.24.X.26, a Zoning Administrator's Determination to deviate from LAMC Section 12.21.C.8.a to provide more than two retaining walls and to build retaining walls in excess of the permitted height including: (1) Build a maximum 4 retaining walls in lieu of the maximum 2 allowed; (2) Provide 8-foot tall building walls (from natural grade) in the front yard; (3) Provide the maximum 4 retaining walls to be 8 feet tall from natural grade in lieu of the 3 feet, 6 inches feet required above natural ground level adjacent to a feature, railing or ramp; (4) Provide a retaining wall with a maximum height of 20 feet in the side and rear yards lieu of the maximum 12 feet allowed. Also, pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to permit three canopies with a 2-foot 6-inch side yard setback for a length of approximately 20 feet along Lucas Avenue in lieu of the required 9 feet; Pursuant to LAMC Section 12.22.A.25, the applicant is setting aside 15% of the project's total units for low income households for a period of 30 years, and is requesting the following: (1) to permit an additional 6% density bonus (an additional 9 units) over what is permitted by-right on the site in lieu of the 27.5% increase allowed for project a project providing 15 percent of low income affordable units, and 2) provide 170 parking spaces in conformance with Parking Option No. 1 as stated in LAMC Section 12.22.A.25.d.1. Finally, pursuant to Section 17.A.1 of the CCWSP and LAMC Section 11.5.7.C, a Project Permit Compliance Review with the Central City West Specific Plan. In conjunction with the Project Permit Compliance, the Applicant requests permission to locate 50% of the required trees off-site as provided for by Appendix D Section C 2 of the CCWSP. Pursuant to various sections of the LAMC, the Applicant will request approvals and permits for the Building and Safety Department and other municipal agencies for project construction actions, including but not limited to the following: demolition, excavation, haul route, shoring, grading, foundation, building, and tenant improvements.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Beverly Lucas, LLC. Attn: Matthew Sullivan
515 S. Figueroa, Suite 1060
Los Angeles, CA 90071

FINDING:
The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

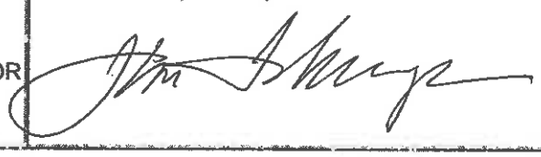
(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-make may adopt the mitigated negative declariation, 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 THIS FORM	TITLE	TELEPHONE NUMBER
HAYDEE URITA-LOPEZ	City Planning Assistant	(213) 978-1453

ADDRESS	SIGNATURE (Official)	DATE
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012		11/04/2009

☞ **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.

Helen Nieto-Lopez — Planning Assistant

SIGNATURE — TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as

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JAMES WILLIAMS
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CITY OF LOS ANGELES
CALIFORNIA

ANTONIO R. VILLARAIGOSA
MAYOR

FILED
OCT 15 2009
DEAN C. LOGAN
REGISTRAR-RECORDER/COUNTY CLERK
BY ANTHEREBY DEPUTY

EXECUTIVE OFFICES

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NOTICE OF INTENT TO ADOPT

A MITIGATED NEGATIVE DECLARATION

Public Resources Code Section 21092 and Cal. Code of Regulations Title 14, Section 15072 (the Guidelines for the California Environmental Quality Act) require a local agency to provide a notice of intent to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency of the negative declaration or mitigated negative declaration to allow the public and agencies the review period provided under Section 15105 of the Guidelines.

Project Title: ENV-2009-2036-MND

Project Location (include county): 1416-1430 West Beverly Boulevard and 109-125 1/2 South Lucas Avenue; Westlake; Los Angeles

Project Description: The demolition of all existing residential and industrial uses on the site and the proposed construction, maintenance, and use of a new as a 6-story (up to 87-foot tall), 153-unit multifamily residential project (containing approximately 132,351 square feet of floor area) with 170 parking spaces within three subterranean parking levels, including approximately 15,958 square feet of common and open space amenities (such as a lobby, fitness room, community room, swimming pool, and open space) all on an approximate 54,900 square foot site in the RC4(CW)-U/3.7 Zone and R4(CW) Zone. In addition, the applicant has indicated that they will haul approximately 24,089 cubic yards of soil. Per APCC-2009-2066-SPE-ZAA-ZAD-SPP, the applicant is requesting that Pursuant to LAMC Section 11.5.7, the following Specific Plan Exceptions from the Central City West Specific Plan (CCWSP): (1) From Section 6.F.3.a.2 of the CCWSP to permit a 153-unit multi-family project without commercial floor area, which is otherwise required within the Specific Plan's RC4(CW) Zone; (2) From Section C.1 of Appendix D of the CCWSP and consistent with LAMC Section 11.5.7.F.1 (c) to provide 15,958 square feet of open space as defined by the CCWSP and 12,092 square feet of open space as defined by the LAMC in lieu of the 16,150 square feet of open space required. Also, pursuant to LAMC Section 12.24.X.26, a Zoning Administrator's Determination to deviate from LAMC Section 12.21.C.8.a to provide more than two retaining walls and to build retaining walls in excess of the permitted height including: (1) Build a maximum 4 retaining walls in lieu of the maximum 2 allowed; (2) Provide 8-foot tall building walls (from natural grade) in the front yard; (3) Provide the maximum 4 retaining walls to be 8 feet tall from natural grade in lieu of the 3 feet, 6 inches feet required above natural ground level adjacent to a feature, railing or ramp; (4) Provide a retaining wall with a maximum height of 20 feet in the side and rear yards lieu of the maximum 12 feet allowed. Also, pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to permit three canopies with a 2-foot 6-inch side yard setback for a length of approximately 20 feet along Lucas Avenue in lieu of the required 9 feet; Pursuant to LAMC Section 12.22.A.25, the applicant is setting aside 15% of the project's total units for low income households for a period of 30 years, and is requesting the following: (1) to permit an additional 6% density bonus (an additional 9 units) over what is permitted by-right on the site in lieu of the 27.5% increase allowed for project a project providing 15 percent of low income affordable units, and 2) provide 170 parking spaces in conformance with Parking Option No. 1 as stated in LAMC Section 12.22.A.25.d.1. Finally, pursuant to Section 17.A.1 of the CCWSP and LAMC Section 11.5.7.C, a Project Permit Compliance Review with the Central City West Specific Plan. In conjunction with the Project Permit Compliance, the Applicant requests permission to locate 50% of the required trees off-site as provided for by Appendix D Section C 2 of the CCWSP. Pursuant to various sections of the LAMC, the Applicant will request approvals and permits for the Building and Safety Department and other municipal agencies for project construction actions, including but not limited to the following: demolition, excavation, haul route, shoring, grading, foundation, building, and tenant improvements.

09 0035729

THIS NOTICE WAS POSTED
ON OCT 15 2009
UNTIL NOV 16 2009

Schedule: The City of Los Angeles will receive comments on the proposed mitigated negative declaration beginning October 15, *2009 for* **20** *days, ending November 4, 2009*. The City of Los Angeles, as lead agency, will make a determination on the project, following a public hearing to be scheduled.

Copies of the proposed mitigated negative declaration and all documents referenced in the proposed mitigated negative declaration are available for review during the lead agency's normal business hours at: City of Los Angeles Planning Department, Environmental Review Section, 200 North Spring Street, Room 750, Los Angeles, California 90012.

Signature: _____ **Title:** Senior City Planner **Date:** 11/4/2009

09 0035729

MITIGATION MONITORING AND REPORTING PLAN

A. INTRODUCTION

Section 21081.6 of the Public Resources Code requires 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).

In 2009, an Initial Study/Mitigated Negative Declaration (IS/MND) was prepared (and adopted by the City of Los Angeles) to address the potential environmental impacts of the Beverly and Lucas Project. Where appropriate, the IS/MND included mitigation measures to avoid or to reduce potentially significant environmental impacts of the Project. This Mitigation Monitoring and Reporting Plan (MMRP) is designed to monitor implementation of the mitigation measures identified for the Project (refer to the MMRP table on the following pages). The required mitigation measures are listed and categorized by impact area, as identified in the IS/MND, with an accompanying identification of when the mitigation measure is required to be implemented and the agency responsible for overseeing enforcement of the measures.

The Project Applicant shall be responsible for implementing all mitigation measures unless otherwise noted.

MMRP Table

Mitigation Measure	Timing/Schedule	Implementation Responsibility	Implementation and Verification	
			Action	Date Completed
1. Aesthetics				
Mitigation Measure 1-1: Light and Glare Outdoor lighting shall be designed and installed with downcast shielding, so that the light source cannot be seen from adjacent residential properties.	Prior to issuance of a Certificate of Occupancy	City of Los Angeles – Building and Safety		
Mitigation Measure 1-2: Light and Glare The exterior of the proposed buildings shall be constructed of non-reflective materials such as tinted non-reflective glass, metal panel, and pre-cast concrete, stucco, or fabricated wall surfaces.	Prior to issuance of a Certificate of Occupancy	City of Los Angeles – Building and Safety		
5. Cultural Resources				
Mitigation Measure 5-1: Archeological Resources In the event that subsurface resources are encountered during the course of grading and/or excavation, all development shall temporarily cease in these areas until the Planning Department of the City of Los Angeles is contacted and agrees upon a qualified archaeologist to be brought onto the Project site to properly assess the resources and make recommendations for their disposition. Construction activities could continue in other areas. If any find were determined to be significant by the archeologist, they shall be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.	On-going throughout Project ground-disturbing activities/Prior to issuance of a Building Permit	City of Los Angeles - Planning		
Mitigation Measure 5-2: Paleontological Resources A qualified paleontologist, as determined by the Planning Department of the City of Los Angeles, shall monitor future ground-disturbing activities in native soil. In the event that paleontologist resources are discovered during grading and/or excavation, the monitor shall be empowered to temporarily halt or divert construction in the immediate vicinity of the discovery while it is evaluated for significance. Construction activities could continue in other areas. If any find were determined to	On-going throughout Project ground-disturbing activities/Prior to issuance of a Building Permit	City of Los Angeles - Planning		

MMRP Table

Mitigation Measure	Timing/Schedule	Implementation Responsibility	Implementation and Verification	
			Action	Date Completed
be significant by the paleontologist, they shall be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.				
6. Geology and Soils				
Mitigation Measure 6-1: Seismic Groundshaking The proposed Project shall implement all recommendations for building design features included in the Geotechnical Study prepared for the Project. Mitigation Measure 6-2: Geologic Instability Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The project shall comply with the Uniform Building Code Chapter 18. Division1 Section1804.5 Liquefaction Potential and Soil Strength Loss. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.	On-going throughout Project design and construction Prior to issuance of grading or building permits	City of Los Angeles – Building and Safety City of Los Angeles – Building and Safety		
7. Hazards and Hazardous Materials				
Mitigation Measure 7-1: Hazardous Materials Pursuant to mandatory regulatory compliance the Project Applicant shall abide by	On-going throughout Project construction	City of Los Angeles – LAFD, Building and Safety		

MMRP Table

Mitigation Measure	Timing/Schedule	Implementation Responsibility	Implementation and Verification	
			Action	Date Completed
EPA, SCAQMD, the Cal/OSHA Construction Safety Orders, California Code of Regulations, Title 8, Section 1532.1 and with the California Health and Safety Code, Division 20, Chapter 6.5 for the evaluation, handling and transport of materials containing hazardous substances.	and operation phases			
Mitigation Measure 7-2: Methane Pursuant to mandatory regulatory compliance the Project Applicant shall abide by Design Level II standards as presented in the City of Los Angeles Methane Code, which would require the Project to incorporate a passive methane mitigation system, a horizontal membrane and venting system, trench dams and utility seal-offs. Additionally, at the design level phase, the Project shall implement the engineer's design recommendations subject to the approval of the Department of Building and Safety, and the City of Los Angeles Fire Department.	During Project construction	City of Los Angeles – LAFD, Building and Safety		
8. Hydrology and Water Quality				
Mitigation Measure 8-1: Water Quality Pursuant to mandatory regulatory compliance the Project Applicant shall abide by the following: 1) Section 402 (p) of the federal Water Pollution Control Act, or Clean Water Act (CWA); 2) Order No. 01-182 of the Los Angeles Regional Water Quality Control Board, which regulates the issuance of waste discharge requirements to Los Angeles County; 3) the County of Los Angeles Standard Urban Storm Water Mitigation Plan (SUSMP); 4) the Los Angeles Municipal Code (LAMC); and 5) the State Water Resources Control Board (SWRCB), which	During Project construction and operation phases	City of Los Angeles – Building and Safety		

MMRP Table

Mitigation Measure	Timing/Schedule	Implementation Responsibility	Implementation and Verification	
			Action	**Date Completed**
required the Project Applicant to file a Notice of Intent (NOI) and prepare a Storm Water Pollution Prevention Plan (SWPPP) in compliance with the Statewide General Permit for Discharges of Stormwater Associated with Construction Activity (General Permit). The SWPPP shall incorporate Best Management Practices (BMPs) to control erosion and to protect the quality of surface water runoff during the construction period. The owner of the Project site shall maintain all structural or treatment control BMPs for the life of the Project.				
12. Noise				
Mitigation Measure 11-1: Construction Noise Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.	On-going through construction phase	City of Los Angeles – Building and Safety		
Mitigation Measure 11-2: Construction Noise The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, jackhammers, and pile drivers.	On-going through construction phase	City of Los Angeles – Building and Safety		
Mitigation Measure 11-3: Construction Noise Noise 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-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.	On-going through construction phase	City of Los Angeles – Building and Safety		
Mitigation Measure 11-4: Construction Noise Equipment warm-up areas, water tanks, and equipment storage areas shall be	On-going through construction phase	City of Los Angeles – Building and Safety		

MMRP Table

Mitigation Measure	Timing/Schedule	Implementation Responsibility	Implementation and Verification	
			Action	Date Completed
located as far as possible from the surrounding residential uses.				
Mitigation Measure 11-5: Construction Noise The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.	On-going through construction phase	City of Los Angeles – Building and Safety		
Mitigation Measure 11-6: Construction Noise Flexible sound control curtains shall be placed around drilling apparatuses and drill rigs used within the Project site, if sensitive receptors are located at or within 50 feet.	On-going through construction phase	City of Los Angeles – Building and Safety		
Mitigation Measure 11-7: Construction Noise All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.	On-going through construction phase	City of Los Angeles – Building and Safety		
Mitigation Measure 11-8: Construction Noise The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.	Prior to commencement of construction activities	City of Los Angeles – Building and Safety		
Mitigation Measure 11-9: Construction Vibration Existing structure demolition and site excavation located within 75 feet of the multi-family uses shall only occur between 9 a.m. and 5 p.m. Monday through Friday.	On-going through construction phase	City of Los Angeles – Building and Safety		

MMRP Table

Mitigation Measure	Timing/Schedule	Implementation Responsibility	Implementation and Verification	
			Action	Date Completed
Mitigation Measure 11-10: Construction Vibration 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.	On-going through construction phase	City of Los Angeles – Building and Safety		
13. Public Services				
Mitigation Measure 13-1: Police Services The Project Applicant shall contact the Crime Prevention Unit of the Los Angeles Police Department for advice with respect to crime prevention features and shall incorporate any feasible features into the design of the proposed Project.	Prior to issuance of a Building Permit	City of Los Angeles – LAPD, Building and Safety		
Mitigation Measure 13-2: Police Services The Project Applicant shall provide the Rampart Area Commanding Officer with the diagram of each portion of the property. The diagram shall include the access routes and any additional information that might facilitate police response as requested by the Rampart Area Commanding Officer.	Prior to issuance of a Certificate of Occupancy	City of Los Angeles – LAPD		
Mitigation Measure 13-3: School Services Pursuant to standard regulatory compliance the Project Applicant shall abide by California Education Code Section 17620(a)(1) and shall be obligated to pay any required developer impact fees as established at the time of Project development.	Prior to issuance of a Building Permit	City of Los Angeles – Planning		
Mitigation Measure 13-4: Parks and Recreational Services Pursuant to mandatory regulatory compliance the Project Applicant shall abide by the following:	Prior to issuance of a Building Permit	City of Los Angeles – Planning		

MMRP Table

Mitigation Measure	Timing/Schedule	Implementation Responsibility	Implementation and Verification	
			Action	Date Completed
1) Los Angeles Municipal Code Section 17.12 (Park and Recreation Site Acquisition and Development Provisions) and pay applicable Quimby Fees. 2) Los Angeles Municipal Code Section 21.10.3(a)(1) (Dwelling Unit Construction Tax) and pay applicable Parkland Fees.				
Mitigation Measure 13-5: Library Services The Project Applicant shall pay a mitigation fee of $200 per capita based upon projected residential population generated as a result of the buildout of the Project.	Prior to issuance of a Building Permit	City of Los Angeles – Planning		
16. Utilities and Service Systems				
Mitigation Measure 16-1: Solid Waste Services Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.	Prior to issuance of a Demolition Permit	City of Los Angeles – Building and Safety		
Mitigation Measure 16-2: Solid Waste Services To facilitate on-site separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.	On-going through construction phase	City of Los Angeles – Building and Safety		
Mitigation Measure 16-3: Solid Waste Services Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and	On-going through operation phase	City of Los Angeles – Public Works		

MMRP Table

Mitigation Measure	Timing/Schedule	Implementation Responsibility	Implementation and Verification	
			Action	Date Completed
recycled accordingly as a part of the project's regular solid waste disposal program. Mitigation Measure 16-4: Solid Waste Services A recyclables collection room shall be maintained and available for residential use at all time.	On-going through operation phase	City of Los Angeles – Public Works		