Environmental Review Section

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

ENVIRONMENTAL IMPACT REPORT (DRAFT)

WESTCHESTER-PLAYA DEL REY COMMUNITY PLAN AREA

Playa Manchester Project

ENV-2008-2610-EIR

Council District No. 11

THIS DOCUMENT COMPRISES THE DRAFT ENVIRONMENTAL IMPACT REPORT AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

Project Address:
7270 through 7298 West Manchester Avenue and 8624 Rayford Drive

Project Description: The Proposed Project involves the demolition of approximately 24,000 square feet of retail uses and the development of a mixed-use structure containing approximately 260 dwelling units, including 16 joint live/work units, above one subterranean and two above-ground parking levels containing approximately 475 parking spaces. The Proposed Project would also contain approximately 58,437 square feet of open and recreational space including landscaped areas, a gym/multi-purpose area, a swimming pool, an outdoor courtyard, and private balconies.

APPLICANT:
Decron Properties

PREPARED BY:
Christopher A. Joseph & Associates

March 2010

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I. INTRODUCTION/SUMMARY

A. INTRODUCTION

The purpose of the Introduction/Summary is to provide the reader with a clear and simple description of the Proposed Project and its potential significant environmental impacts. Section 15123 of the *CEQA Guidelines* requires that the summary identify each significant effect and recommended mitigation measures and alternatives that would minimize or avoid potential significant impacts. The summary is also required to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and how to mitigate significant effects. This section focuses on the major areas of the project that are important to decision-makers and uses non-technical language to promote understanding. This summary is intended as an overview and should be used in conjunction with a thorough reading of the Draft Environmental Impact Report (Draft EIR). The text of this report, including figures, tables, and appendices, serves as the basis for this summary.

B. PURPOSE OF THE EIR

This Draft EIR is intended to serve as an information document for the public agency decision-makers and the public regarding the Playa Manchester Project (Proposed Project). The Proposed Project is a mixed-use project that is proposed to be located at the southeast corner of the intersection of Manchester Avenue and Rayford Drive in the Westchester community of the City of Los Angeles. The project applicant is Decron Properties Corp., 6222 Wilshire Boulevard, Suite 400, Los Angeles CA 90048. A detailed description of the Proposed Project is contained in Section III, Project Description, of this Draft EIR.

The Proposed Project would require approval of certain discretionary actions by the City of Los Angeles and other governmental agencies. Therefore, the Proposed Project is subject to environmental review requirements under the California Environmental Quality Act (CEQA). For purposes of complying with CEQA, the City of Los Angeles, Department of City Planning, Environmental Review Section, at 200 N. Spring Street, Room 763, Los Angeles, CA 90012 is identified as the Lead Agency for the Proposed Project.

As described in more detail below, the Proposed Project represents a change to the Playa del Oro mixed-use project, a portion of which has recently been constructed on the property that adjoins the project site. The Los Angeles City Council adopted a mitigated negative declaration ("MND") for the Playa del Oro project (ENV 2002-7628 MND) and approved the project in Case No. CPC 2003-5554-VZC-SPP (Council File 04-0443) on May 19, 2004. Therefore, the Proposed Project is subject to Section 15162 of the *State CEQA Guidelines*, which provides as follows:

> *(a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows … that the project will have one or more significant effects not discussed in the previous EIR or negative declaration.

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a)….

(c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described above occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR or negative declaration has been certified or subsequent negative declaration adopted.

(d) A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR shall state where the previous document is available and can be reviewed.

As the lead agency for the Proposed Project, the City of Los Angeles has determined that the Proposed Project represents a substantial change to the Playa del Oro project that requires major revisions to the previous MND. Therefore, this Draft EIR constitutes a "subsequent EIR" under Section 15162 of the CEQA Guidelines. As such, this Draft EIR focuses on the incremental effects of the Proposed Project on the environment, compared against the effects of the previously-approved Playa del Oro project. *See Benton v. Board of Supervisors* (1991) 226 Cal.App.3d 1467 (upholding an agency's decision to limit its environmental review to the incremental effects of a proposal to relocate a previously-approved winery). *See also* Remy et al., *Guide to the California Environmental Quality Act* (10th ed. 2007) pp. 168 (If the project constitutes a modification of a project that was previously-approved and previously subjected to environmental analysis, then the "baseline" for purposes of CEQA is adjusted such that the originally-

approved project is "assumed to exist"). In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid significant environmental impacts.

C. EIR PROCESS

Notice of Preparation

In compliance with Section 21080.4 of the California Public Resources Code, a Notice of Preparation (NOP) was prepared by the Department of City Planning and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies and other interested parties on October 30, 2008. The NOP was circulated for 30 days with the comment period ending December 1, 2008. Appendix A to this Draft EIR contains a copy of the NOP. Appendix B to this Draft EIR contains the written responses received by the City in response to the NOP.

Environmental Issues to be Analyzed in the EIR

Based on public comments in response to the NOP and review of environmental issues by the City of Los Angeles Department of City Planning, this Draft EIR analyses the following impact areas:

- Aesthetics
- Air Quality
- Cultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population, Housing and Employment
- Public Services
    - Fire
    - Police
    - Schools
    - Recreation and Parks
    - Libraries
- Traffic, Transportation, and Parking
- Utilities and Services
    - Water
    - Sewer
    - Solid Waste
    - Electricity
    - Natural Gas

Environmental Review Process

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days. After completion of the 45-day review period, a Final EIR will be prepared that responds to comments on the Draft EIR submitted during the review period and modifies the Draft EIR as required. Public hearings on the Proposed Project will be held after completion of the Final EIR. The City will make the Final EIR available to agencies and the public prior to considering certification of the EIR. Notice of the time and location will be published prior to the public hearing date. All comments or questions about the Daft EIR should be addressed to:

Adam Villani, Environmental Review Coordinator
Environmental Review Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Organization of the Draft EIR

The Draft EIR is organized into eight sections as follows:

Section I (Introduction/Summary): This section provides an introduction to the environmental review process and a summary of the project description, alternatives, environmental impacts, and mitigation measures.

Section II (Environmental Setting): An overview of the environmental setting of the Proposed Project is provided including a description of existing and surrounding land uses, and a list of related projects.

Section III (Project Description): A complete description of the Proposed Project including project location, project site characteristics, project characteristics, project objectives, and required discretionary actions is presented.

Section IV (Environmental Impact Analysis): The Environmental Impact Analysis section is the primary focus of this EIR. Separate discussions are provided to address the potential environmental effects of the Proposed Project. Each environmental issue contains a discussion of existing conditions, an assessment and discussion of the significance of impacts associated with the Proposed Project, mitigation measures, cumulative impacts, and level of impact significance after mitigation.

Section V (General Impact Categories): This section provides a summary of significant and unavoidable impacts of the Proposed Project, a discussion of potential growth inducing effects, and an explanation of the significant irreversible environmental changes.

Section VI (Alternatives to the Proposed Project): This section includes an analysis of a range of reasonable alternatives to the Proposed Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the project and alternatives that would avoid or substantially lessen any of the significant effects of the project.

Section VII (Preparers of the EIR): This section presents a list of City, County, and other agencies and consultant team members that contributed to the preparation of the EIR.

Section VIII (Acronyms and Abbreviations): This section presents an alphabetical list of all acronyms and abbreviations found within the EIR.

D. SUMMARY OF THE PROPOSED PROJECT

The Proposed Project involves the demolition of 24,000 square feet of retail uses and the construction of a four- to six-story structure over three levels of parking, of which one level would be subterranean, on a 3.03-acre site. The Proposed Project involves the development of 260 dwelling units, including 16 ground floor joint live/work units, a multi-purpose room/gym area, a pool, landscaped common areas, and 475 parking spaces for a total of 266,456 square feet of development (see Table III-1 and Figures III-2 through III-8). Pedestrian access to the project site would be provided along with a landscaped buffer on both Manchester Avenue and Rayford Drive. Vehicular access would be shared with the Playa del Oro development and would be provided via one main driveway on Manchester Avenue and one service driveway on an alley way located south of the project site, which directly connects to Rayford Drive. These driveways would allow access to and from the subterranean parking area on the east and south sides of the structure. Additionally, appropriate signs would be posted at the intersection of the alley and Rayford Drive to prohibit project-generated and other traffic from using the alley to travel through the community south of the project site.

Previous Environmental Review

The purpose of this Draft EIR is to provide project-level subsequent environmental impact analysis that accurately analyzes the Proposed Project in light of current conditions, circumstances, and new information that was not available and not analyzed in previously certified environmental documentation. The eastern portion of the project site was previously approved for a 134-unit building pursuant to Case No. CPC 2003-5554 VZE-SPR. The building was approved on May 19, 2004 as part of the 539-unit Playa del Oro mixed-use project that is currently under construction on the adjacent property east of the project site. As part of its approval, the City Council found that the potential environmental impacts of the Playa del Oro project can be reduced to a less than significant level with the implementation of specified mitigation measures and adopted a Mitigated Negative Declaration (ENV 2002-7628-MND).

As approved, the 539-unit Playa del Oro project was to consist of three separate buildings. Two of the buildings, which will contain 405 dwelling units, have been constructed. However, construction of the third building, which would contain 134 units, has not commenced. The 134-unit building is considered to be part of the baseline conditions in this Draft EIR because it has already undergone review under CEQA and any potential environmental effects have been mitigated pursuant to the mitigation measures required for the Playa del Oro project. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 dwelling units, resulting in a net increase of 126 dwelling units. Therefore, this Draft EIR analyzes the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

E. AREAS OF KNOWN CONTROVERSY

Section 15123 of the *CEQA Guidelines* requires an EIR to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved. The letters submitted in response to the NOP are contained in Appendix B to this Draft EIR. Concerns raised in letters submitted to the City of Los Angeles in response to the NOP included the following:

- Air Quality: Quantifying $PM_{2.5}$ Emissions, Additional Traffic Trips
- Cultural: Historical, Archeological Resources & Provisions for Native American Remains
- Land Use and Planning: Compatible Land Use
- Population and Housing: Increased Residents
- Traffic: Preparation of a Traffic Impact Report, including impacts on the Metro Bus Lines

F. ISSUES TO BE RESOLVED

Issues to be resolved include whether or how to mitigate potentially significant environmental impacts from the Proposed Project and whether one of the alternatives should be approved rather than the Proposed Project.

G. ALTERNATIVES

This EIR considers a range of alternatives to the Proposed Project to provide informed decision-making in accordance with Section 15126.6 of the *State CEQA Guidelines*. As described below in greater detail, the alternatives to the Proposed Project that are analyzed in this Draft EIR include: 1) No Project Alternative; 2) Reduced Density Alternative; 3) Mixed-Use (Retail/Residential) Alternative; and 4) Existing Zoning Alternative.

Alternative A – No Project Alternative

The No Project Alternative is the circumstance under which the project does not proceed. The *State CEQA Guidelines* (Section 15126.6(e)) provide that the "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the Proposed Project is not approved based on current plans and consistent with available infrastructure and community services. Under the No Project Alternative, the commercial uses and surface parking lot currently located on the western portion of the project site would remain at their current levels of operation. As described in Section III, Project Description, the Applicant has a vested right to construct 134 previously-approved dwelling units on the eastern portion of the project site. Under the No Project Alternative, no new development would occur on the western portion of the project site; however, the 134 dwelling units would be developed on the eastern portion of the project site.

Alternative B – Reduced Density Alternative

Under the Reduced Density Alternative, the project site would be built out in a manner similar to the Proposed Project. However, the size of the development would be reduced by approximately 25 percent for a total of 199,842 square feet. Whereas the Proposed Project would consist of 260 dwelling units, including 16 joint live/work units, the Reduced Density Alternative would provide a total of 195 dwelling units, including 12 joint live/work units. Similarly, parking facilities, recreational amenities (i.e., the proposed gym/multi-purpose area), and open space would be reduced by 25 percent to approximately 118,203 square feet (approximately 357 parking spaces), 1,050 square feet, and 43,828 square feet under this alternative, respectively. Building heights under this alternative would also be reduced by 25 percent.

Alternative C – Mixed-Use (Retail/Residential) Alternative

Under the Mixed-Use (Retail/Residential) Alternative, the project would be developed similar to the Proposed Project. However, under this alternative, the space proposed for the 16 joint live/work units fronting Manchester Avenue would be replaced with commercial/retail uses. Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed with a mixed-use structure totaling approximately 255,652 square feet including 222 dwelling units (totaling approximately 217,156 square feet), approximately 42,500 square feet of common area, approximately 27,380 square feet of commercial/retail uses fronting Manchester Avenue. The parking area would be constructed directly behind the commercial/retail uses with additional parking below the residential units. Parking would be provided in three levels (two above ground and one subterranean) containing 516 parking spaces. The floor to area ratio under the Mixed-Use (Retail/Residential) Alternative would be 1.94:1. All other aspects of the project, including building heights, would be the same as described under the Proposed Project.

Alternative D – Existing Zoning Alternative

Under the Existing Zoning Alternative, the project site would be developed in accordance with the existing City of Los Angeles Los Angeles Municipal Code zoning regulations. Under the Existing Zoning Alternative, the existing commercial uses would be demolished and an approximately 94,860 square-foot retail building with 380 parking spaces (in subterranean or partially subterranean levels) would be developed on the [Q]C4-1-CDO zoned (western) portion of the project site and the construction of the previously-approved 134 dwelling units would occur on the [Q]RAS4-1-CDO zoned (eastern) portion of the project site. Under the Existing Zoning Alternative there would be full compliance with the "Q" conditions (Ordinance No. 175,981), compliance with commercial corner regulations (LAMC Section 12.22-A.23), and compliance with transitional height limits (LAMC Section 12.21.1-A.10). The maximum building height for the retail building would be limited to 45 feet.

Environmentally Superior Alternative

In addition to the discussion and comparison of impacts of a Proposed Project and the alternatives, Section 15126.6 of the *State CEQA Guidelines* requires that an "environmentally superior" alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. Based on the

alternatives analysis provided, and summarized in Table VI-32, Alternatives Comparison, the Reduced Density Alternative would result in similar impacts to those associated with the Proposed Project, however, impacts under this alternative would occur to a lesser degree than under the Proposed Project. Therefore, the Reduced Density Alternative is considered to be the environmentally superior alternative.

H. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table I-1 summarizes the various environmental impacts associated with the construction and operation of the Proposed Project. Mitigation measures are proposed for significant impacts, and the level of significance after mitigation is also identified.

Table I-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
IMPACTS FOUND TO BE LESS THAN SIGNIFICANT		
Agricultural Resources The Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. The Westchester area and adjacent properties are not utilized for agricultural purposes. The western portion of the project site is currently developed with commercial uses. The eastern portion of the project site is currently vacant. Furthermore, the project site is not designated for use as agricultural land. The project site is not under a Williamson Act Contract. Therefore, development of the Proposed Project would result in less than significant impacts.	None.	Less than significant.
Biological Resources The project site does not contain any species identified as a candidate, sensitive, or special status species. The western portion of the project site supports a total of five trees which meet the City's trunk diameter criterion and/or protected status. Implementation of the Proposed Project would require the removal of two Coast Live Oaks and three mature ornamental trees, defined as non-protected species. City of Los Angeles Protected Tree Ordinance No. 177,404 provides that a protected species tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. The Ordinance also requires that for each protected species tree removed, a minimum of two trees of the same species shall be planted and that the size and number of the replacement trees shall approximate the value of the trees to be replaced. To reduce potentially significant impacts to protected tree species and non-native tree species which would be removed by the Proposed Project, the mitigation measures listed shall be implemented. No riparian or other sensitive habitat areas are located on or adjacent to the project	A-1. Prior to the issuance of a grading permit, the Project Applicant shall provide a Mitigation Planting Plan to compensate for the loss of two Coast Live Oaks, and three mature ornamental trees. The Mitigation Planting Plan shall include a 2:1 replacement of Coast Live Oaks with a minimum 24-inch box size (i.e. a minimum of four new 24-inch box Coast Live Oaks), and a 1:1 replacement of mature non-protected species with a minimum 24-inch box size (i.e. a minimum of three new 24-inch box ornamental trees). The plantings may occur at project entry points, common areas, or along the Manchester Avenue right-of-way. It is understood that this Mitigation Planting	Less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
site. Therefore, implementation of the Proposed Project would not result in any adverse impacts on riparian habitat or other sensitive natural communities. No protected wetlands occur on the project site or in the immediate area. The project site does not support any riparian or wetland habitat and no impacts on riparian or wetland habitats would occur. Buildout of the Proposed Project would not interfere with or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. No impacts to habitat conservation plans would occur as a result of the buildout of the Proposed Project.	Plan would be only a part of the overall project landscape plans, which should also include additional trees and understory plantings of climate-adapted plant material. All planting plans shall be to the satisfaction of the City of Los Angeles Urban Forestry Division of the Bureau of Street Services, the Department of Planning and the Advisory Agency. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards. A-2. When planted in or adjacent to vehicular use areas the genus or genera of the tree(s) shall provide a minimum crown of 30'-50'. Please refer to City of Los Angeles Landscape Ordinance (Ord. No. 170,978), Guidelines K - Vehicular Use Areas. A-3. Removal of all trees in the public right-of-way shall require the approval of the Board of Public Works. A-4. The project applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the Advisory Agency guaranteeing the survival of trees required to be maintained, replaced or relocated in such a	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	fashion as to assure the existence of continuously living trees for a minimum of three (3) years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new tree bond to the satisfaction of the Bureau of Engineering. Subsequently the original owner's bond may be exonerated. A-5. The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Any bond required shall be in a sum estimated by the City Engineer to be equal to the dollar value of the replacement tree or of the tree which is to be relocated. In determining value for these purposes, the City Engineer shall consult with the Advisory Agency and shall also consult the evaluation of trees guidelines approved and adopted for professional plantsmen by the International Society of Arboriculture, the American Society of Consulting Arborists, the National Arborists Association and the American Association of Nurserymen, and other available, local information, or guidelines. A-6. Prior to the exoneration of the bond, the owner	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	of the project site shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the trees were properly replaced, the date of the replacement and the survival of the replacement trees for a period of three years.	
Cultural Resources *Historic Resources* There are no known historic resources on or adjacent to the project site. There are currently three single-story structures existing on the western portion of the project site; the eastern portion of the project site is currently vacant. None of the structures meet the minimum fifty-year age requirement for consideration as a landmark at the national or state levels. Additionally, none of the on-site or adjacent buildings meet the criteria for designation under the California Register of Historical Resources, nor are they identified as a California Historical Landmark or listed on the National Register of Historic Places, National Register Information System (NRIS). Furthermore, the closest City of Los Angeles Historic-Cultural Monuments are the Loyola Theater, approximately 1.25 miles east of the project site, and the Los Angeles International Airport Theme Building, approximately one mile southeast of the project site. Therefore, no project impact on historical resources would occur.	None.	Less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Geology and Soils There are no active surface fault traces identified by the State, known to be present on the project site. The project site is not located within a designated Alquist-Priolo Zone. No known or potentially active faults pass through the project site. Potential impacts from seismic ground shaking are present throughout Southern California and would be of comparable intensity at the project site as they would be for large parts of the City of Los Angeles and the region. The Proposed Project would be required to comply with existing codes which reduce seismic risks to an acceptable level; thus, the Proposed Project would have a less than significant impact with regard to seismic ground shaking. The project site is not located within a potentially liquefiable area. As such, buildout of the Proposed Project would not expose people or structures to adverse impacts related to liquefaction. No impacts with respect to liquefaction would result. The project site contains no slopes adequate to support landslide conditions. The project site is not classified by the City of Los Angeles as being within a landslide hazard area. Therefore, the Proposed Project would not expose people or structures to adverse effects resulting from landslides and no project impacts would occur. The area surrounding the project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Proposed Project. The implementation of the required construction Best Management Practices (BMPs) would ensure that soil erosion impacts would be less than significant. No exposed areas subject to erosion would be created or affected by the Proposed Project. The use of septic tanks or alternative wastewater disposal systems would not be required and no impact with respect to this issue would occur.	None.	Less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Mineral Resources The Playa Manchester project site is not located within an area containing significant mineral deposits or a surface mining district. No classified or designated mineral deposits of statewide or regional significance are known to occur on or near the project site. The project site is not located in oil field or drilling areas as designated by the City of Los Angeles. Furthermore, no oil wells or mineral operations currently exist on-site. Therefore, the Proposed Project would not cause the permanent loss of, or access to any significant oil resources and no impacts on oil or mineral resources would occur.	None.	Less than significant.
AESTHETICS		
Views The project site does not contain any scenic resources such as rock outcroppings, or historic buildings, and no State-designated scenic highways are located adjacent to or within view of the project site. The two nearest State-designated scenic highway are Culver Boulevard and Vista del Mar, located approximately 1.14 miles northwest and 1.48 miles west, respectively. However, the project site is not visible from either of these scenic highways due to the topography of the area and existing development. Scenic resources in the project area include the Ballona Wetlands, views from the coastal bluffs, and nearby historic resources. However, none of these scenic resources are visible from or across the project site. Therefore, impacts on scenic resources would be less than significant. Buildout of the Proposed Project would introduce new structures with a height and massing that would be generally larger than most of the surrounding uses, which are one to two stories in height. However, at between three and five stories in height the	B-1 Project lighting, including security lighting, shall be directed onto the project site, and all lighting shall be shielded from adjacent roadways and off-site properties. B-2 Atmospheric light pollution shall be minimized by utilizing lighting fixtures that cut-off light directed to the sky. B-3 All glass to be incorporated into the exterior of the building shall be either of low-reflectivity, or accompanied by a non-glare coating. B-4 On-site signs shall be limited to the maximum allowable under the LAMC.	With implementation of the mitigation measures, impacts of the Proposed Project on views of and through the project site and impacts related to light and glare would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Proposed Project would be generally consistent in height and mass with the Playa del Oro development currently under construction directly adjacent to the east, and the three-story multi-family residential structure on the northwest corner of Manchester Avenue and Rayford Drive, northwest of the project site. Impacts related to the change in the visual appearance and character of the project site would be less than significant. The view lines through the project site would be greatly reduced. No scenic resources are currently available in the vicinity of the project site and the existing surrounding development prevents views of any potential scenic resources in the distance through the project site. Development of the Proposed Project would not affect scenic views; impacts associated with blockage of views would be less than significant. Project implementation may incrementally increase the amount of nighttime lighting. As outlined in Mitigation Measure B-1 and B-2, all security and architectural lighting would be shielded, limiting the Proposed Project's contribution to ambient lighting levels to an amount similar to what is currently experienced in the project vicinity. Additionally, any signage associated with the proposed live/work units on the ground floor would be compliant with LAMC § 12.11.5-B-4 and § 14.4.4-E, which limit sign illumination. Therefore, with implementation of the mitigation measures, the Proposed Project would not result in a substantial amount of light that would adversely affect day or nighttime views in the project vicinity, and impacts would be less than significant. Development of the Proposed Project would include architectural features and façades that have a low level of reflectivity, including the use of design features such as non-reflective glass. The Proposed Project would eliminate the existing source of glare from windshields of parked cars by moving all parking to the enclosed parking		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
garage. With implementation of Mitigation Measure B-3, which requires the use of glass with low reflectivity or non-glare coating, the net potential for glare generation would be reduced to the maximum extent possible. As such, with implementation of the mitigation measures, impacts related to glare would be less than significant. All signage would be subject to review by the appropriate City entities. Additionally, as discussed, all signs would be compliant with LAMC §§ 12.11.5-B.4 and 14.4.4-E and would be required to comply with provisions set forth in the Loyola Village CDO. Therefore, impacts would be less than significant. **Shade/Shadow** *Winter Solstice* The Proposed Project's maximum height would be tall enough to result in winter solstice shadows extending beyond the surrounding roadways. These shadows would only cast onto small portions of the landscaped areas of the multi-family residential uses to the north, across Manchester Avenue, and the church to the west, across Rayford Drive. However, winter shadows cast by the Proposed Project would not be cast onto nearby shadow-sensitive uses in excess of the three-hour threshold during the course of one day. As such, no significant winter shadow impact from the Proposed Project would occur. *Summer Solstice* Shadows cast during the summer solstice are shorter than at any other time of the year. These shadows would cast onto the Playa del Oro development for less than the threshold four hours. Development of the Proposed Project would result in shadows only being cast upon the adjacent Playa del Oro project at 5:00 P.M. and	None.	There are no mitigation measures required.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
would not impact nearby sensitive uses. Therefore, impacts would be less than significant.		
AIR QUALITY		
AQMP (Air Quality Management Plan) Consistency The Proposed Project is planned in a way that results in the minimization of vehicle miles traveled (VMT) both within the project area and the community in which it is located, thereby, minimizing the amount of air pollutant emissions. Therefore, the Proposed Project would be consistent with the goals of the Air Quality Management Plan (AQMP) for reducing the emissions associated with new development and would not impair implementation of the AQMP; this impact would be less than significant. ***Construction Impacts*** *Regional Air Quality Impacts* Construction-related daily emissions would not exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds for ROG, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ during any of the construction phases. Consequently, impacts associated with regional construction-related emissions from the Proposed Project during all construction phases would be less than significant. *Local Air Quality Impacts* On-site emissions generated by the Proposed Project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$ at a receptor distance of 82 feet. Thus, the on-site construction emissions would also not exceed the SCAQMD localized thresholds at receptor	No mitigation measures are required for the Proposed Project.	The level of significance for the Proposed Project's air quality-related impacts would be less than significant without implementation of mitigation.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
distances beyond 82 feet (i.e., 164, 328, 656, and 1,640 feet). Therefore, the localized air quality impacts resulting from construction emissions associated with the Proposed Project would be less than significant. ***Operational Impacts*** *Regional Air Quality Impacts* The operational emissions associated with the Proposed Project would not exceed the established SCAQMD threshold levels for VOC, NO_x, CO, SO_x PM_{10}, and $PM_{2.5}$ during both the summertime (smog season) and wintertime (non-smog season). Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant. *Local Air Quality Impacts* On-site operational emissions generated by the Proposed Project would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$. Thus, the localized air quality impacts resulting from operational emissions associated with the Proposed Project would be less than significant. ***Localized CO Impacts*** The SCAQMD recommends an evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse, and/or if the LOS worsens from C to D or worse. Based on the traffic study prepared for the Proposed Project, none of the proposed project traffic volumes would meet these criteria at the seven analyzed study intersections. As such, an evaluation of potential localized CO impacts		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
associated with the Proposed Project would not be necessary, and impacts would be less than significant. ***Toxic Air Contaminants*** As the Proposed Project consists of the development of residential and joint live/work uses, and would not include any land uses that would typically involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, no toxic airborne emissions would typically result from its implementation. In addition, construction activities associated with the Proposed Project would be typical of other similar 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 that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant. ***Objectionable Odors*** Objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. Since the Proposed Project involves the development of residential and joint live/work units, no elements related to industrial projects and their odor producing elements are anticipated. Thus, impacts associated with objectionable odors during operation of the Proposed Project would be less than significant. 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		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
temporary source of nuisance to adjacent uses, but because they are temporary and intermittent in nature, the odors would not be considered a significant environmental impact. Therefore, impacts associated with construction-generated odors would be less than significant. ***Consistency with General Plan Air Quality Element*** The Proposed Project would be consistent with goals, objectives, and policies set forth in the City's General Plan Air Quality Element. Therefore, no impact would occur with respect to consistency with the applicable air quality policies in the General Plan. ***Greenhouse Gas Emissions*** *Greenhouse Gas Inventory* The Proposed Project construction Greenhouse Gas (GHG) emissions would be approximately 601.82 metric tons per year, while the 2004 Statewide Total emission level was 364,000,000 metric tons per year. Additionally, the net increase in GHG emissions from vehicle, electrical, and natural gas usage associated with operation of the Proposed Project would be approximately 211.03 metric tons per year. Emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is not possible to predict the specific impact, if any, to global climate change from one project's		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
relatively small incremental increase in emissions. **<u>Compliance with 2006 CAT Report Strategies and ARB's Scoping Plan Recommended Measures</u>** The following design features result in a reduction in criteria air pollutant and GHG emissions, and are proposed as part of the Proposed Project: • The project site is located as adjacent to a mixed-use project (i.e., Playa del Oro project) that consists of multi-family residential, retail, and restaurant uses. Thus, the project site is located within walking distance of shopping sites for project residents. • The Proposed Project would promote integrated urban living by offering residential amenities to complement and enhance the surrounding "Community Commercial" land uses and the surrounding Westchester-Playa del Rey community. The Proposed Project would be consistent with all feasible and applicable strategies to reduce greenhouse gas emissions in California. Therefore, the impact of the Proposed Project would be less than significant.		
CULTURAL RESOURCES		
Archaeological Resources There are no known archaeological resources on the project site. Archaeological resources that may have existed on the site have likely been previously unearthed or disturbed. The anticipated excavation activities associated with the Proposed Project would include the foundations and utilities, as well as one subterranean level of parking. However, in the event that subsurface resources are encountered during the	**Archaeological Resources** D-1. A covenant and agreement shall be recorded between the Proposed Project and the City of Los Angeles Department of City Planning prior to obtaining a grading permit stating that if any archaeological resources are encountered during	With implementation of the mitigation measures, the Proposed Project would have a less than significant impact with respect to archaeological and paleontological resources.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
course of grading and/or excavation, per the California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, all development is required to temporarily cease in these areas until the City of Los Angeles Planning Department 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. With the implementation of mitigation measures, impacts from the development of the Proposed Project on any archaeological resources would be reduced to a level of less than significant. ***Paleontological Resources*** There are no known paleontological resources on the project site. No vertebrate fossil sites have been identified in the vicinity of the project site and therefore top soil and previously disturbed surficial layers in the project area are not likely to contain substantive vertebrate fossils. The project site has been previously disturbed, paved, and developed with commercial uses. Excavations anticipated for the Proposed Project are those associated with foundations, utilities installation, and one subterranean level of parking. While it is possible that paleontological resources could be discovered during construction activities, it is unlikely due to previous disturbance and development of the project site. However, in the event that paleontological resources are encountered during the course of grading and/or excavation, per the California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, all development is required to temporarily cease in these areas until the City of Los Angeles Planning Department is contacted and agrees upon a qualified paleontologist to be brought onto the project site to properly assess the resources and make recommendations for their disposition. With the implementation of mitigation measures, impacts from the development of the Proposed Project on the paleontological resources would be reduced to a level of less	Project development, the project shall be halted. The services of an archaeologist shall be secured by contacting the South Central Coastal Information Center (SCCIC), or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. If an archaeological survey, study or technical report is prepared, copies shall be submitted to the SCCIC. **Paleontological Resources** D-2. A covenant and agreement shall be recorded between the Proposed Project and the City of Los Angeles Department of City Planning prior to obtaining a grading permit stating that if any paleontological materials are encountered during the course of the project any paleontological materials are encountered during the course of the project development, the project shall be halted. The services of a qualified paleontologist approved by the City or County of Los Angeles and the Los Angeles County History Museum (LACM) Vertebrate Paleontology shall be retained to assess the resources and evaluate the impact. If a paleontological survey, study or technical report	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
than significant. ***Human Remains*** No known human burials have been identified on the project site. Excavations anticipated for the Proposed Project are those associated with foundations, utilities installation, and one subterranean level of parking. While it is possible that human remains could be discovered during construction activities there would be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent remains. With the implementation of the precautionary guidelines mentioned, potential impacts on human remains would be less than significant.	is prepared, copies shall be submitted to the LACM. **Human Remains** D-3. If human remains are discovered at the project site during construction, work at the construction site shall be suspended, and the City of L.A. Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment of disposition of the remains.	
HAZARDS AND HAZARDOUS MATERIALS		
Routine Transport, Use, or Disposal of Hazardous Materials *Construction* Construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of residential development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. Therefore, the Proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during	E-1. For USTs currently in use and any found to be present on-site, a qualified UST consultant shall decommission the UST in compliance with the LAFD and other applicable state agencies. E-2. Prior to construction, further investigation is required to assess the potential for subsurface groundwater and soil contaminants in the vicinity of the former Gerald's Hardware Store on-site. If contaminated soils are found to be present, a qualified abatement consultant shall	With the implementation of mitigation measures, impacts related to hazards and hazardous materials would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
construction and impacts would be less than significant. *Operation* Operation of the Proposed Project would involve the transport, use, and disposal of hazardous materials typically associated with residential uses. Hazardous materials commonly used in the operations of residential uses include minimal amounts of solvents and household products used for routine cleaning, maintenance, and landscaping. Therefore, the uses developed under the Proposed Project would not involve the routine transport, use, or disposal of substantial amounts of hazardous materials and impacts would be less than significant. ***Storage Tanks*** The UST associated with the former service station was removed from the project site by 1989 while the UST associated with the former Gerald's Hardware Store possesses an unknown status, and the UST associated with the on-site mechanic is currently in operation with no reported spills, leaks, or other environmental violations. Upon demolition, the removal of USTs found on-site would be carried out in accordance with all applicable City, State, and federal requirements. The LAFD would be consulted prior to the removal of storage tanks to ensure that nearby sensitive receptors would not be adversely affected during the removal process and that any contaminated soil is properly handled and disposed of. Mitigation measures are provided to ensure the safe removal of the any USTs uncovered during the demolition process and remediation of contaminated soils. With implementation of Mitigation Measures E-1 through E-3, impacts related to storage tanks would be less than significant.	abate the soils in compliance with the Department of Building and Safety and other applicable State regulations. E-3. Prior to the issuance of a building permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified abatement consultant that no contaminated soils are present on-site. If contaminated soils are found to be present, a qualified abatement consultant shall abate the soils in compliance with the Department of Building and Safety and other applicable State regulations. E-4. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified PCB abatement consultant that no PCBs are present on-site. If PCBs are found to be present, a qualified abatement consultant shall abate the site in compliance with the applicable City, State and federal rules and regulations. E-5. In the event that any suspect ACMs are discovered during future construction activities at the site, the materials shall be sampled and analyzed for asbestos content prior to any disturbance. Prior to the issuance of the	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Polychlorinated Biphenyls PCBs may be present in any fluorescent light ballast discovered on-site and, although unlikely, in the pad-mounted transformer and hydraulic fluid used in the hydraulic lifts operated by the auto mechanic. Therefore, mitigation measures are provided to ensure the safe removal of any identified PCBs. With implementation of Mitigation Measure E-4, impacts to PCBs would be less than significant. ***Asbestos-Containing Materials*** The possible occurrence of ACM in the resilient floor tile/mastic and roofing material at the project site does not necessarily require any type of remediation. Any ACM would have to be handled properly in the event that buildings or fixtures containing such materials were demolished or remodeled. Certain maintenance activities would be advised if ACMs were left in place and the buildings reused. Because all on-site structures would be demolished under the Proposed Project, mitigation measures are provided to ensure the safe removal of any identified ACMs. With implementation of Mitigation Measure E-5, impacts related to the presence and safe removal of any on-site ACMs would be less than significant. ***Lead-Based Paint*** LBP materials were not sought on-site as the project site is not developed with residential uses. However, a previous LBP analysis identified lead levels below federal standards in the Re-Max portion of the on-site structures. If other sources of LBP are encountered on-site, LBP materials may require special handling and disposal as all on-site structures would be demolished under the Proposed Project. Therefore, mitigation measures are provided to ensure the safe removal of any identified LBPs. With implementation of Mitigation Measure E-6, impacts related	demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If additional ACMs are found to be present, a qualified asbestos abatement consultant shall abate the buildings in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other State and federal rules and regulations. E-6. A LBP survey shall be conducted to determine the existence of any LBP on-site. Any contractor who would disturb lead containing surfaces shall be notified of the hazard and their requirement to comply with the applicable City, State, and federal regulations. Any additional LBP identified shall be abated by a qualified abatement consultant in accordance with all applicable City, State, and federal regulations. E-7. Because the project site is located in a City-designated Methane Buffer Zone, the applicant shall be required to comply with Division 71 of the Los Angeles Municipal Code detailing the inclusion of a methane mitigation system.	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
to potential on-site LBP would be less than significant. ***Methane Gas*** The project site is located within a City of Los Angeles Methane Buffer Zone. Methane gas is generated in the area by subterranean sources, including oil production facilities and resources located to the west along the coast. With compliance with Division 71 of the Los Angeles Municipal Code and implementation of Mitigation Measure E-7, impacts related to on-site methane contamination would be less than significant. ***Proximity to a School*** The project site is located within 0.03 mile of Loyola Village Elementary School. Groundwater in the vicinity of the project site trends southeast. Because of the location of the school relative to the project site, an accidental release of hazardous materials resulting in groundwater intrusion could impact Loyola Village Elementary School. However, construction and operation of the Proposed Project will not include the heavy use, handling, or storage of large amounts of hazardous materials. Any accidental release of hazardous materials from the Proposed Project would not likely result in groundwater intrusion that could reach the nearby elementary school. Therefore, it is considered unlikely that an accidental release of hazardous materials would impact Loyola Village Elementary School and impacts would be less than significant.		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Hazardous Materials Sites *On-Site* It is considered possible that a UST is still located on-site. As such, Mitigation Measures E-1 through E-3 shall be implemented. The UST associated with the existing on-site auto mechanic is used for the storage of used motor oil associated with routine operation. Concentrations of metal on-site were within found to be within background levels. Concentrations of diesel range hydrocarbons were reported below the guidance levels set forth in the California LUFT Manual. Prior to demolition and construction activities, Mitigation Measures E-1 through E-3 shall be implemented. With the implementation of the included mitigation measures, impacts related to possible on-site soil contamination would be less than significant. *Off-Site* Three land uses in the vicinity of the project site were identified in a review of hazardous materials databases. The Airport Marina Hotel, AMFAC Hotel, and Furama Hotel (which formerly occupied a portion of the project site) are listed on the RCRA-TSD, FINDS, HAZNET, and RCRA-SQG databases. The waste category is listed as an "organic" small quantity generator with no reported releases or violations. The database identified waste material that no longer exists at the identified site; there is no potential for these materials to impact the project site or vicinity. The Loyola Village Elementary School is listed on the FINDS database. However, no releases or contamination issues have been reported regarding this location. The Otis College of Art and Design is listed on the HAZNET and EMI databases. The waste category is listed as "photo-chemicals and photo-processing waste" with no		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
releases, contamination issues, or violations reported. Because these two identified sites exist hydraulically down gradient from the project site, it is unlikely that any potential release of hazardous materials could impact the project site. Therefore, impacts would be less than significant. ***Proximity to an Airport*** The nearest airport to the project site is the Los Angeles International Airport. The project site is not located within the boundaries of an airport land use plan and would not result in a safety hazard for people residing or working in the project area. The Proposed Project is not located in the vicinity of a private airstrip. Therefore, no impact would occur. ***Emergency Response Plan*** Manchester Avenue and Lincoln Boulevard are City-designated selected disaster routes. In addition, according to the Safety Element of the General Plan of the City of Los Angeles, a Selected Emergency Facility identified as a City of Los Angeles Maintenance Warehouse is located approximately 0.37 miles southeast of the project site. Despite its proximity to both selected disaster routes and the Selected Emergency Facility, the Proposed Project would not impede access to or from Manchester Avenue or Lincoln Boulevard, or interfere with operation at the nearby City Maintenance Warehouse. The construction and operation of the Proposed Project would not interfere with any other adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant. ***Wildland Fire*** The project site is not located within a City-designated Wildland Fire Hazard Area.		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Thus, no impact with respect to wildland fires would occur.		
HYDROLOGY AND WATER QUALITY		
Surface Water Hydrology Runoff levels resulting from buildout of the Proposed Project are anticipated to be the same as under existing conditions, detention basins will not be required. The existing municipal storm drain system will be able to accommodate the flows generated under the Proposed Project. Therefore, impacts to existing storm drain system capacity resulting from buildout of the Proposed Project would be less than significant. Appropriate debris filters would be installed at strategic locations in accordance with the Stormwater Pollution Prevention Plan (SWPPP). The project site is currently considered completely developed and primarily covered with impervious surfaces. Upon project buildout, potential erosion of the project site would be roughly the same as under current conditions because new development under the Proposed Project would also cover the project site with primarily impervious surfaces. Thus, development of the project site would not result in significant impacts related to surface water runoff. *Tsunamis, Seiches, and Flooding* The project site would not be susceptible to tsunamis due to its location at approximately 1.6 miles east of the Pacific Ocean and its relatively high elevation of approximately 153 feet above sea level as compared to the surrounding properties. Therefore, the project site would not be susceptible to tsunamis. There are no large bodies of water in the immediate vicinity of the project site. The	As impacts related to surface water runoff and water quality would be less than significant, no mitigation measures are required. However, the City requires implementation of the following standard measures to ensure the mitigation of the less-than significant impacts. **Short-Term Construction Impacts** F-1. All earthwork on the project site shall be performed in accordance with the requirements of the City of Los Angeles Department of Building and Safety, the City of Los Angeles Civil Engineer of Record, and the Storm Water Pollution Prevention Program. F-2. All waste shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site. F-3. Leaks, drips, and spills shall be cleaned up	Impacts related to hydrology and water quality would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
closest body of water is the Ballona Creek and Ballona Wetlands, which is located approximately 0.6 miles northwest of the project site and at a lower elevation than the project site. Therefore, the project site would not be susceptible to seiches. According to the Safety Element of the General Plan of the City of Los Angeles, the project site is not located within a 100-year or 500-year flood hazard area as mapped on a Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) or other flood hazard delineation map. Therefore, the future development of the project site would not result in or expose people or structures to flooding resulting from the failure of a levee or dam. Impacts related to seismically induced tidal phenomena and flooding would be less than significant. ***Groundwater*** The groundwater table at the nearby groundwater well number 1307F was measured at approximately 111.5 feet bgs. Development of the project site includes excavation down to between approximately 12 and 24 feet bgs for the proposed enclosed parking levels. As excavation activities would terminate above the groundwater table, excavation activities would not result in the alteration of groundwater flows beneath the project site. Therefore, impacts would be less than significant. ***Water Quality*** *Construction-Related Impacts* Three general sources of short-term construction-related stormwater pollution associated with the project site are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) earth moving activities which, when	immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. F-4. Pavement at material spills shall not be hosed down. Dry cleanup methods shall be used whenever possible. F-5. Waste containers shall be covered and maintained. Uncovered waste containers shall be stored under a roof or covered with tarps or plastic sheeting. F-6. Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets. F-7. All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills. **Surface Water Runoff/Water Quality Impacts** F-8. Project applicant(s) are required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment; and 3) the maintenance and operation of construction equipment. <u>Construction Materials</u> The project site would contain a variety of construction materials that are potential sources of stormwater pollution. Categories of such materials include: adhesives, cleaning agents, landscaping, plumbing, painting, heating/cooling, and masonry materials, floor and wall coverings, and construction debris. Construction material spills can be a source of stormwater pollution and/or soil contamination, which could generate a potentially significant impact to water quality. With implementation of the required BMPs and the mitigation measures listed, short-term impacts on water quality from construction materials would be less than significant. <u>Site Grading</u> Grading activities can greatly increase erosion processes, which would generate a potentially significant impact to water quality. With implementation of the required BMPs, and the mitigation measures listed, short-term impacts on water quality from site grading would be less than significant. <u>Equipment Maintenance</u> Poorly maintained vehicles and heavy equipment that leak fuel, oil antifreeze, or other fluids on the construction site are also common sources of stormwater pollution and soil contamination which would generate a potentially significant impact on water quality. However, with the implementation of the required BMPs, short-term impacts on water quality from equipment maintenance would be less than	in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required. All structural or treatment control BMPs shall be maintained for the life of the project. F-9. Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rates for developments where increased peak stormwater discharge rate will result in increased potential for downstream erosion. F-10. Maximize trees and other vegetation at the site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants. F-11. Reduce impervious surface area by using impermeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers (i.e., turf block); and granular materials (i.e., crushed aggregates,	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
significant. *Long-Term Operation Impacts* To prevent potential impacts, the Proposed 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 RWQCB, which regulates the issuance of waste discharge requirements to Los Angeles County; 3) the County of Los Angeles Standard Urban Stormwater Mitigation Plan (SUSMP); and 4) the City of Los Angeles Municipal Code (LAMC). The project site would provide structural or treatment control BMPs designed to control stormwater runoff contamination. While some infiltration through landscaped areas would occur, the project site would primarily rely on the implementation of Treatment Control BMPs to control stormwater runoff contamination. As required by the SUSMP, detailed plans for the project site's compliance with the SUSMP would be submitted to the City as part of the development plan approval process prior to issuance of building and grading permits. Detailed plans would include the location of oil and grease separators at storm drain inlets, and the location of infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping. With compliance with the SUSMP requirements, the Proposed Project's operational impacts on stormwater quality would be less than significant. The project site would be required to comply with the City's Urban Runoff Ordinance, which outlines practices for all developments in the City and runoff control requirements for all new development. Good housekeeping practices include: 1) collection, storage, and minimization of urban runoff; 2) maintenance of equipment; 3) removal of debris; and 4) prohibition of the use of any pesticides and fungicides that are banned by the US Environmental Protection Agency. All new developments in the City must prepare an Urban Runoff Mitigation Plan that must	cobbles). F-12. Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation. F-13. Toxic wastes must be discarded at a licensed regulated disposal site. Trash waste containers must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Drip pans or absorbent materials shall be used whenever grease containers are emptied. Containers shall be washed in an area with properly connected sanitary sewer. F-14. Reduce the use of hazardous materials and waste by: using detergent-based or water-based cleaning systems; and avoid chlorinated compounds, petroleum distillates, phenols, and formaldehyde. F-15. Utilize natural drainage systems to the maximum extent practicable. F-16. Control or reduce or eliminate flow to natural drainage systems to the maximum extent practicable. F-17. Protect slopes and channels and reduce run-off	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
address one or more of the following goals: 1) maximization of permeable areas for infiltration of runoff; 2) maximization of the amount of runoff directed toward permeable areas or stored for reuse; and 3) removal of pollutants through installation of treatment control BMPs, Compliance with the City's Urban Runoff Ordinance would ensure that the Proposed Project does not adversely affect off-site water quality. Furthermore, with implementation of the mitigation measures listed, impacts on water quality would be reduced to a level of less than significant.	velocities by complying with Chapter IX, Division 70 of the Los Angeles Municipal Code and utilizing vegetation (grass, shrubs, vines, ground covers, and trees) to provide long-term stabilization of soil. F-18. All storm drains inlets and catch basins within the project area must be stenciled with prohibitive language (such as "NO DUMPING – DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping. Signs and prohibitive language and/or graphical icons prohibiting illegal dumping must be posted at public access points along channels and creeks within the project area. The legibility of any stencils and/or signs must be maintained. F-19. Materials with the potential to contaminate stormwater must be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs. F-20. The hazardous materials storage area must be paved and sufficiently impervious to contain leaks and spills. F-21. The hazardous materials storage area must have	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	a roof or awning to minimize collection of stormwater within the secondary containment area. F-22. The owner of the property shall prepare and execute covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions. F-23. Incorporate appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Protect outlets of culverts, conduits, or channels from erosion by discharge velocities by installing a rock outlet protection. Install sediment traps below the pipe-outlet. Inspect, repair, and maintain the outlet protection after each significant rain.	
LAND USE AND PLANNING		
Community Division The project site is located in the Westchester community, which is generally characterized by a mix of residential and commercial uses. The area surrounding the	The applicant shall be required to comply with all applicable zoning requirements and to incorporate traffic modifications and/or pay any required fees set forth in the Coastal Transportation Corridor Specific Plan, as	Impacts on land use compatibility and zoning would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
project site is developed with residential, commercial, and retail uses as well as recreational facilities and parking lots. As the uses proposed by the project, which are residential and joint live/work units, are similar to those mentioned above, the Proposed Project would be compatible with the types of uses surrounding the project site. More specifically, the Proposed Project would be developed adjacent to single-family residential uses along Villanova Avenue to the south of the project site, and along Rayford Drive southwest of the project site. Development of the Proposed Project would create more of a visual contrast between the existing structures to the south and southwest and the proposed structure due to its height and massing. However, development of the Proposed Project would not limit access to the existing residential uses to the south, nor would it divide the established community. The Proposed Project would provide a visual contrast to the low-density commercial uses and surface parking lot currently on the project site. However, it would be similar in design to the adjacent Playa del Oro mixed-use development currently under construction directly east of the project site, as well as the multi-family residential uses along Manchester Avenue to the north of the project site. As the Proposed Project would include similar uses to those of the surrounding area and be consistent with the design of surrounding development, no significant impacts would result from the Proposed Project with regard to land use compatibility. Furthermore, the Proposed Project would not physically divide an established community as no separation of uses or disruption of access between land use types would occur as a result of the Proposed Project.	determined by the Department of Transportation. Compliance with these regulations will reduce project impacts to a less than significant level. Therefore, no mitigation measures are required.	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Consistency with Land Use Plans, Policies, and Regulations *Regional Comprehensive Plan and Guide* The Proposed Project would generally conform to objectives set forth in the Regional Comprehensive Plan and Guide (RCPG), including those objectives provided in the Growth Management, Regional Mobility, and Housing Chapters. Therefore, impacts would be less than significant. *Final 2008 Regional Comprehensive Plan* The Proposed Project supports the Final 2008 Regional Comprehensive Plan (RCP) goals by locating the Proposed Project in proximity to a job-rich area, thus minimizing urban sprawl, associated automobile trip emission, and demand on local infrastructure. In addition, the project site is located in proximity to existing public transit opportunities provided by Metro and Big Blue Bus (BBB) lines, which provide service in the immediate project vicinity. The Proposed Project would be consistent with the Final 2008 RCP objectives regarding water quality, watershed management and planning, and sustainable water supplies. The Proposed Project would incorporate the use of existing and planned stormwater catchment systems and would direct stormwater in a manner that would not result in substantial erosion or flooding within the project site or off-site locations. In addition, if required, new storm drains would be designed and sized using the Los Angeles County Hydrology Manual method for a minimum 50-year-frequency storm event capacity. In addition, the Proposed Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Accordingly, the Proposed Project would be generally consistent with the Final 2008 RCP and related land use impacts would be less than significant. *City of Los Angeles General Plan* The Proposed Project would generally conform to the policies identified in the various Elements of the General Plan and impacts would be less than significant. *Westchester-Playa del Rey Community Plan* <u>Consistency with Community Plan Land Use Designation</u> The Community Plan designates the project site as Community Commercial and refers to the City of Los Angeles Municipal Code for specific land uses permitted within this designation. The Community Commercial land use designation allows for the construction of commercial and medium- to high-density multi-family residential uses. Development of the Proposed Project would include the construction of a mixed-use development containing multi-family residential and joint live/work units. This type of development would be consistent with the Community Commercial land use designation. The current zoning on the project site is [Q]C4-1-CDO, on the western portion, and [Q]RAS4-1-CDO, on the eastern portion. The Proposed Project includes a proposed zone change from the current split zoning to (T)(Q)RAS4-1-CDO for the entire project site. Under the Community Plan, the RAS4 zone corresponds to the Community Commercial designation. Therefore, if approved, the proposed zone		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
change would be consistent with the Community Plan. <u>Consistency with Community Plan Policies</u> The Proposed Project would implement a number of Community Plan policies, thereby assisting the City in meeting many of the Community Plan's goals and objectives. Therefore, impacts would be less than significant. *Loyola Village Community Design Overlay* The project site is located within the boundaries of the Loyola Village CDO District. The Proposed Project would be generally consistent with the design guidelines and standards provided in the Loyola Village CDO. Therefore, project impacts would be less than significant. *Los Angeles Coastal Transportation Corridor Specific Plan* The Los Angeles Coastal Transportation Corridor Specific Plan (Specific Plan) provides an outline for development within the Specific Plan Area to encourage alternate modes of transportation (i.e., bicycle, mass transit, etc.) as well as implementation of the Transportation Impact Assessment Fee which helps fund transportation infrastructure improvement. As the project site is located within the Specific Plan Area, development of the Proposed Project would be required to comply with any traffic mitigation measures or fees set forth by the Specific Plan. With implementation of required mitigation measures and/or payment of required fees, as determined by the Department of Transportation, potential impacts would be less than significant.		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
City of Los Angeles Planning and Zoning Code Currently, the project site is designated [Q]C4-1-CDO on the western portion of the project site and [Q]RAS4-1-CDO on the eastern portion of the project site. The Q conditions for the eastern (RAS4-1) portion of the project site were established pursuant to Ordinance No. 175,996, adopted May 19, 2004. The Q conditions for the western (C4-1) portion of the project site were established pursuant to Ordinance No. 175,981, adopted May 11, 2004. Additionally, included in the Discretionary Actions for the Proposed Project is a zone change that would change the western portion of the project site from [Q]C4-1-CDO to [Q]RAS4-1-CDO. This zone change would designate the entire project site as (T)(Q)RAS4-1-CDO. Therefore, the Proposed Project would not be developed under the current split-zoning situation. As such, the following provides an analysis of the Proposed Project's compliance with the City's Planning and Zoning Code under the proposed zone change. The Proposed Project involves the development of 260 dwelling units, including 16 joint live/work units. Pursuant to LAMC Section 12.16, the proposed residential and joint live/work uses are permitted within the RAS4 zone, as outlined in LAMC Section 12.11.5. These proposed uses are also permitted within the (T)(Q)RAS4-1-CDO zone as provided under the "Q" condition. Therefore, project impacts under the proposed zone change with respect to zoning consistency would be less than significant. Within the RAS4 zone, front yard setbacks are required at a minimum depth of five feet; side and rear yard setbacks are also required at a minimum of five feet in width. The Proposed Project would provide a seven foot front yard**,** including compliance with CDO standards to construct the 16 joint live/work uses no more than two feet from any property line abutting the front yard, a 15 foot side yard, and a seven foot		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
rear yard setback plus the additional 28 feet for the existing rear access road. Thus the Proposed Project would exceed the required setbacks for front, side, and rear yards; therefore, no significant impact would occur. The proposed RAS4 classification allows for development of R4 uses on the project site. The Proposed Project would develop 260 residential units, including 16 joint live/work units, which would be permitted under development regulations of the R4 zone. The project site is also located in Height District 1, which typically permits a maximum floor area ratio (FAR) of 3:1 with no height limit in the RAS4 zone. The proposed 260 residential units, including 16 joint live/work units, would occupy 266,456 square feet and would be developed on a 131,943 square-foot lot. Thus, the FAR for the Proposed Project would be 2.02:1, which falls within the allowable 3:1 FAR. Additionally, the RAS4 classification requires a minimum lot area of one unit per 400 square feet. Applying the density limitation of the RAS4-1 zone to the 131,943 square-foot lot, the Proposed Project would be limited to constructing no more than 330 dwelling units. The Proposed Project would include 70 fewer units than the maximum density permitted in the RAS4-1 zone. Therefore, the Proposed Project would be consistent with the density limitations and impacts would be less than significant. The Proposed Project would involve the development of 260 dwelling units, including 16 joint live/work units. Per LAMC requirements, the Proposed Project would require approximately 35,200 square feet of open space based on an estimated average unit size. The Proposed Project would provide approximately 59,837 square feet of common open space, including 35,159 square feet of landscaped area, and approximately 1,400 square feet of private open space to include a multi-purpose room and gym area, as well as a swimming pool. Therefore, the Proposed Project would have a less than significant impact with respect to the open space required as		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
set forth in the LAMC. As discussed in greater detail in Section IV.K, Traffic, Transportation, and Parking, the Proposed Project would require a total of approximately 407 resident parking spaces under the current LAMC regulations. Therefore, the 475 parking spaces provided by the Proposed Project would provide more than adequate parking to meet the requirements under LAMC. <u>City of Los Angeles Sign Regulations</u> The Proposed Project would incorporate project identity sings and address signs, which would be compliant with LAMC §§ 12.11.5-B.4 and 14.4.4-E. Furthermore, all signage would be subject to review by the appropriate City entities. Therefore, the Proposed Project would have less than significant impacts with regards to signage regulations and policies. *City of Los Angeles Planning Department Walkability Checklist* While the walkability guidelines are not mandatory and are not a part of the LAMC, incorporating them to the maximum extent feasible would create a more walkable environment and a higher quality of urban form for the Proposed Project. The Proposed Project would be generally consistent with the guidelines in the Walkability Checklist; therefore, impacts would be less than significant.		
NOISE		
Construction Noise Construction of the Proposed Project would require the use of heavy equipment for the demolition of the existing on-site structures, grading and excavation at the	No measures are available to reduce the significant and unavoidable construction noise impacts related to the Proposed Project. However, the City requires implementation of the following standard measures to	With compliance with Section 41.40 of the LAMC and the implementation of the Mitigation Measures H-1

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
project site, installation of new utilities, paving, and building fabrication for the proposed mixed-use development. 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. During construction of the Proposed Project, the nearest and most notable off-site sensitive receptors to the project site are the various single- and multi-family uses, church uses, and an elementary school that are located around the project site boundary. The construction activities associated with the Proposed Project would comply with the noise regulations established in Sections 41.40 and 112.05 of the LAMC. Noise levels from construction activities at the project site would exceed 75 dBA at 50 feet from the project site. However, implementation of Mitigation Measures H-1 through H-9, which would require the implementation of noise reduction devices and techniques during construction at the project site, would serve to reduce the noise levels associated with construction of the Proposed Project to the maximum extent feasible. Thus, the Proposed Project would be in compliance with the City's Code with respect to construction, and would not violate the noise standards established in the LAMC. Nevertheless, because construction noise levels associated with the Proposed Project are likely to exceed the existing ambient noise levels at all of the identified off-site sensitive locations, with the exception of the Custom Hotel, by more than 5 dBA for more than ten days in a three-month period and by more than 10 dBA for more than one day, construction activities associated with the Proposed Project would generate a substantial temporary or periodic increase in ambient noise levels in the project vicinity and these construction noise impacts would be	mitigate noise impacts as much as feasible: **Construction Noise** H-1. The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. H-2. Construction and demolition shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday, and prohibited on all Sundays and federal holidays. H-3. Noise and groundborne vibration construction activities whose specific location on the project 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. H-4. Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.	through H-9, which would require the implementation of noise reduction devices and techniques during construction at the project site, construction-related noise impacts associated with the Proposed Project would be reduced to the maximum extent feasible. Nevertheless, because construction noise levels are likely to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period and by more than 10 dBA for more than one day, construction noise impacts would be significant and unavoidable. In terms of building damage, the construction-related vibration impacts associated with the Proposed Project would be potentially significant at the single-family residential uses located

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
significant and unavoidable. As the Custom Hotel would not experience an increase in ambient noise levels due to construction of the Proposed Project, noise impacts at this off-site sensitive receptor during construction at the project site would be less than significant. ***Construction-Related Groundborne Vibration*** Construction activities that would occur within the project site would include demolition as well as grading and excavation, which would have the potential to generate low levels of groundborne vibration. Vibration velocities could reach as high as approximately 0.089 inches per second PPV at 25 feet from the source activity, depending on the type of construction equipment in use. This corresponds to a RMS velocity level (in VdB) of 87 VdB at 25 feet from the source activity. Construction activities would have the potential to impact the nearest surrounding off-site sensitive receptors to the project site as well as existing on-site sensitive receptors. Vibration velocities forecasted to occur at the off-site sensitive receptors would range from 0.0006 PPV at the Custom Hotel located southeast of the project site to 0.995 PPV at the single-family residential buildings located immediately south of the project site. None of the buildings at the identified off-site sensitive use locations are considered to be "fragile" structures, such as historical buildings or buildings that are extremely susceptible to vibration damage. Only the single-family residences located immediately south of the project site could be exposed to PPV groundborne vibration levels that exceed 0.2 inches per second during construction of the Proposed Project, while the remaining off-site sensitive receptor locations would not be exposed to PPV groundborne vibration levels that exceed this threshold. Thus, in terms of building damage, a potentially significant impact associated with groundborne vibration would occur at the single-family residences located south of	H-5. 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. H-6. The project contractor shall use power construction equipment with state-of-the-are noise shielding and muffling devices. H-7. Barriers such as plywood structures or flexible sound control curtains shall be erected between the Proposed Project and the existing single-family residences to the south as well as the proposed multi-family residential uses associated with the Playa del Oro project to the west to minimize the amount of noise to the maximum extent feasible during construction. H-8. 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. H-9. 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	immediately south of the project site. In terms of human annoyance, the vibration levels experienced at the single-family family residential uses located immediately south of the project site and the proposed multi-family residential buildings associated with the Playa del Oro project, which is currently under construction, located east of the project site would be potentially significant. However, implementation of Mitigation Measure H-3 would serve to locate groundborne vibration construction activities as far as possible from the nearest vibration-sensitive land uses, which would reduce the vibration levels experienced at the identified nearby sensitive receptors. In addition, implementation of Mitigation Measure H-11, which would prohibit the use of construction

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
the project site, while a less-than-significant impact would occur at the remaining identified sensitive receptors. In terms of human annoyance, the vibration levels forecasted to occur at the off-site sensitive receptors would range from 42.9 VdB at the Custom Hotel located southeast of the project site to 108 VdB at the single-family residences located immediately south of the project site. Because the vibration levels experienced at the proposed multi-family residential buildings associated with the Playa del Oro project that is currently under construction and the single-family residences located south of the project site would exceed the FTA's threshold of 80 VdB for residences, the vibration impact at these off-site sensitive uses would be potentially significant. The vibration impact at the remaining off-site residential uses would be less than significant. In addition, because the vibration levels experienced at the off-site church buildings to the north and west of the project site as well as the Loyola Village Elementary School classroom buildings to the south of the project site, across Villanova Avenue, would not exceed the FTA's threshold of 83 VdB for institutional uses, which applies to schools and churches, impacts associated with construction-related vibration would be less than significant. ***Operational Noise*** *Traffic Noise* The increase in traffic resulting from implementation of the Proposed Project would increase the ambient noise levels at sensitive off-site locations in the project vicinity. Off-site locations in the project vicinity would experience a slight increase in noise resulting from the additional traffic generated by the Proposed Project. The Proposed Project would not increase local noise levels at any of the analyzed	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 and approved by the City's Department of Building and Safety. H-10. Two weeks prior to the commencement of construction at the project site, notification must be provided to the immediate surrounding off-site residential and church that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. **Construction Vibration** H-11. The operation of construction equipment that generates high levels of vibration, such as large bulldozers, loaded trucks, and jackhammers, shall be prohibited within 45 feet of the existing off-site single-family residences and proposed multi-family residential buildings located	equipment that generates high levels of vibration (i.e., large bulldozers, loaded trucks, and caisson drills) within 45 feet of the existing off-site single-family residences and proposed multi-family residential buildings located immediately south and east of the project site boundary, respectively, during project construction, would ensure that the construction-related vibration impacts at these sensitive receptors would be reduced to a less-than-significant level. Implementation of Mitigation Measure H-12, which would require all new mechanical equipment associated with the Proposed Project to comply with Section 112.02 of the City of Los Angeles Municipal Code, would prevent that noise levels resulting from this equipment from exceeding the

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
roadway segments that are located in proximity to the project site, and thus would not exceed the identified thresholds of significance. 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 dBA and 5 dBA CNEL thresholds established under the *L.A. CEQA Thresholds Guide*, this impact would be less than significant. In addition, as the other roadway segments that are located even further away from the project site would experience less traffic increases due to the Proposed Project, the increase in local noise levels at these roadway segments would also not exceed the identified thresholds of significance, and impacts would be less than significant. *On-site Non-Vehicular Noise* As part of the Proposed Project, new rooftop mechanical equipment and heating, ventilation, and air conditioning (HVAC) units and exhaust fans may be installed on the proposed mixed-use building. The noise levels generated by these new HVAC units and exhaust fans could potentially disturb the existing single-family and multi-family residential uses as well as the proposed multi-family residential buildings associated with the Playa del Oro project located offsite. However, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 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 five decibels. Thus, the 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. In addition, nighttime noise limits would be applicable to any equipment items required to operate between the hours of 10:00 p.m. and 7:00 a.m. As such, this impact	immediately south and east of the project site boundary, respectively, during project construction. Instead, small rubber-tired bulldozers shall be used within this area during demolition, grading, and site preparation operations. **Operational Noise** H-12. All new mechanical equipment associated with the Proposed Project shall comply with Section 112.02 of the City of 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. H-13. All exterior windows associated with the proposed residential uses at the project site shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise	ambient noise level on the premises of other occupied properties by more than five decibels. This would ensure that the effect of the noise levels from this equipment on off-site sensitive uses would be reduced to a less-than-significant impact. In addition, with implementation of Mitigation Measure H-13, which would ensure that all exterior windows associated with the proposed residential uses would be constructed such that sufficient sound insulation is provided to ensure that interior noise levels would be below a CNEL of 45 dBA in any habitable room, impacts associated with interior noise levels at the new residential uses onsite would be reduced to a less-than-significant level. Implementation of Mitigation Measure H-14 would ensure

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
would be less than significant. Nonetheless, Mitigation Measure H-12 is recommended to ensure that all new mechanical equipment associated with the Proposed Project would adhere to Section 112.02 of the City Municipal Code. In order to ensure that on-site operational noise would not adversely affect the future residents at the project site, Mitigation Measure H-13 would be implemented to ensure that all exterior windows associated with the proposed residential uses would be constructed such that sufficient sound insulation is provided to ensure that interior noise levels would be below a CNEL of 45 dBA in any residential unit. *Parking Facility Noise* Noise would be generated by activities within the three levels of parking that would be constructed beneath the residential building. Parking would be provided in two above-ground levels and one subterranean level. As the subterranean parking level would be fully enclosed on all sides, noise generated at this level would not affect the existing off-site sensitive receptors located adjacent to the project site. However, the noise generated at the two above-ground parking levels may potentially affect the adjacent off-site sensitive receptors. Operational-related noise generated by motor driven vehicles within the project site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, Section 114.02 of the LAMC prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. Sources of noise within the parking levels would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the project site. Automobile movements would comprise the most continuous noise	levels below a CNEL of 45 dBA in any habitable room. H-14. The side of the proposed parking structure facing the existing single-family residences to the south of the project site and the proposed multi-family residential uses associated with the Playa del Oro development to the east of the project site shall be fully enclosed. As an alternative, the Proposed Project Applicant may submit evidence to the City's Department of Building and Safety of an alternative design that does not fully enclose the portions of the parking structure facing the single-family residences to the south and the multi-family residential uses to the east, and that achieves noise attenuation such that noise levels from the parking structure would not exceed 61.7 dBA at the project site's property line adjoining the single-family residences to the south and the multi-family residential uses to the west.	that the ambient noise levels at the existing single-family residences to the south of the project site and the proposed multi-family residential uses associated with the Playa del Oro development to the east of the project site would not be exceeded by more than five decibels due to operation of the Proposed Project's parking structure. This would ensure that a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project would not occur at these nearby noise-sensitive receptors. As such, upon implementation of Mitigation Measure H-14, this impact would be reduced to a less-than-significant level.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
source and would generate a noise level of approximately 56 dBA L_{eq} (1-hour) at a distance of 50 feet, while car alarm and horn events, which would occur less frequently, would generate maximum noise levels as high as 49 dBA L_{eq} (1-hour) at a distance of 50 feet. Overall, a composite noise level of 60 dBA L_{eq} (1-hour) at a distance of 50 feet is typically associated with parking structures. The nearest off-site sensitive receptors that may be affected by noise associated with the proposed parking levels are the proposed multi-family residential uses located west of the project site, which are part of the Playa del Oro project, and the single-family residences located immediately south of the project site. As both of these off-site sensitive uses would be located within 50 feet of the proposed parking levels, the noise levels experienced by these off-site sensitive uses may exceed 60 dBA L_{eq} (1-hour). Given that the existing daytime ambient noise level that was measured at the single-family residences to the south of the project site was approximately 56.7 dBA L_{eq}, it is likely that the noise levels generated by the proposed above-ground parking levels would exceed the 5 dBA significance criterion at these sensitive receptors. Thus, a potentially significant impact would occur. *Airport Noise* The project site is located approximately 0.5 miles north of the Los Angeles International Airport (LAX). The range for normally acceptable exterior noise level for multi-family residential uses is 50-65 dBA CNEL, while the range for conditionally acceptable exterior noise level for multi-family residential uses is 60-70 dBA CNEL. According to the Los Angeles County Airport Land Use Plan (ALUP), generally at 65 CNEL level 33 percent of those exposed would be highly annoyed and five percent would actually complain. However, according to the ALUP noise contour for LAX, the location of the project site is beyond the 65 dBA CNEL contour of the airport. Thus, residents at the project site would not be		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
exposed to potentially excessive noise levels associated with the airport and this impact would be less than significant. Aside from LAX, the Proposed Project is not located in the vicinity of any private airstrips. The nearest private airstrip to the project site is the Agua Dulce Airpark, located approximately 38 miles north of the project site. Therefore, no impact with respect to the exposure of persons to excessive airstrip noise levels would occur. ***Operational Vibration*** The Proposed Project would not include stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the project site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on the nearby local roadways, the proposed residential uses at the project site would not be a land use that attracts any of these heavy-duty vehicles. While refuse trucks would be used for the disposal of solid waste at the project site, these trips would typically only occur once a week and would not be any different than those presently occurring at the project site for the existing commercial uses. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.		
POPULATION, HOUSING AND EMPLOYMENT		
Construction Construction of the Proposed Project would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the project site. However, the employment patterns of construction workers in southern California	No mitigation measures are required.	The Proposed Project would result in less than significant impacts on population, housing, and employment.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Proposed Project. Therefore, project-related construction workers would not be likely to relocate their place of residence as a consequence of working on the Proposed Project, and significant housing or population impacts would not result from construction of the Proposed Project. ***Operation*** *Population* The Proposed Project involves the demolition of all on-site uses and the construction of 260 residential units on the project site, which includes the westerly portion of the Playa del Oro site that was previously approved for a 134-unit residential building. Because the Applicant has a vested right to construct the 134-unit residential building on the eastern portion of the project site, the analysis focuses on the proposed net increase of 126 residential units. As the existing on-site uses are all commercial in nature, the 126 residential and joint live/work units also represent an increase in residential construction on the project site. The Proposed Project would be expected to result in an increase of approximately 374 net permanent residents which would be well within the City's and SCAG's anticipated growth rate, representing 0.09 percent of the Citywide total growth to 2015. Impacts related to population and population growth would therefore be less than significant. *Housing* The Proposed Project involves the removal of 24,000 square feet of commercial uses and the construction of 260 residential units on the project site, which includes the westerly portion of the Playa del Oro site that was previously approved for a 134-		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
unit residential building. Because the Applicant has a vested right to construct the 134-unit residential building on the eastern portion of the project site, the analysis below focuses on the proposed net increase of 126 residential units. This would be well within the City's and SCAG's anticipated growth rate, representing 0.08 percent of the Citywide total growth to 2015. Development of the Proposed Project would be within SCAG's housing unit projection for the period between 2000 and 2015 for Census Tract 2766.02 resulting in 487 fewer housing units than anticipated for the census tract containing the project site. Therefore, the Proposed Project would be consistent with the housing projections for the Los Angeles Subregion. Additionally, the Proposed Project would introduce high-density residential uses near a transit corridor, as encouraged by SCAG policy. Therefore, impacts related to housing and housing growth would be less than significant. *Employment* With the exception of the proposed 16 joint live/work units, the Proposed Project does not include any commercial component. Therefore, the Proposed Project is not expected to generate a substantial amount of on-site employment. As the Proposed Project would result in the removal of approximately 24,000 square feet of commercial development, buildout of the Proposed Project could result in a net job loss of up to 54 jobs on the project site. Despite the decrease in employment associated with the implementation of the Proposed Project, SCAG and the City anticipate employment growth in the immediate project area and the Los Angeles Subregion, thereby providing jobs for the new residents generated by the Proposed Project. Therefore, the Proposed Project would result in a less than significant impact regarding employment.		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
PUBLIC SERVICES-FIRE PROTECTION		
Construction activities have the potential to affect fire protection services, 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. 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. Therefore, construction-related impacts on fire protection services would be less than significant. The Proposed Project would introduce approximately 374 new residents. While the number of site visitors cannot be calculated with accuracy, the 374 estimated project residents is a conservative projection of the number of people on-site at any given time. This is due to the fact that many project residents would be employed at off-site locations during the daytime hours. Nonetheless, this increase in residents and visitors to the project site would generate a potential increase in demand for fire protection services. During the project's construction phase, the project applicant would be required to coordinate with LADWP to confirm water conveyance capacity and would be required to install any upgrades that would be necessary, including those for fire flow. Therefore, impacts related to fire flow would be potentially significant unless mitigated. Distance to the nearest fire station is the primary indicator of LAFD's ability to provide adequate services. The Proposed Project is within a 1.5-mile radius of LAFD Fire Station No. 5, the first-in response station, as well as Fire Station No. 67.	Because no significant impacts related to fire protection services would be less than significant, no mitigation measures are required. However, the City requires implementation of the following standard measures to mitigate any of the less-than-significant impacts of the project: J-1. The project applicant shall submit a plot plan to the LAFD prior to occupancy of the project, for review and approval, which shall provide the capacity of the fire mains serving the project site. Any required upgrades shall be identified and implemented prior to occupancy of the project. J-2. The Proposed Project shall comply with all fire code and ordinance requirements for building construction, emergency access, water mains, fire flows, and hydrant placement. Prior to the issuance of a certificate of occupancy for any phase of the project, the applicant shall implement all fire code and ordinance requirements to the satisfaction of the Los Angeles Fire Department. J-3. The design of the project site shall provide adequate access for Fire Department equipment	Impacts related to fire protection services would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
As such, the Proposed Project would be in compliance with the Fire Code mandated response distance and would not be expected to require the installation of an on-site automatic fire sprinkler system. Therefore, the Proposed Project would provide adequate on-site fire protection and impacts would be less than significant. Emergency vehicle access to the Proposed Project would continue to be provided from local and major roadways near the project site (i.e., Manchester Avenue and Lincoln Boulevard), and roadways adjacent to the project site (Rayford Drive and a proposed private driveway adjacent to the southern edge of the project site). Additionally, emergency access to the project site would be maintained at all times. Therefore, impacts related to emergency access would be less than significant.	and personnel to the structure.	
PUBLIC SERVICES-POLICE PROTECTION		
Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. The project applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services. Therefore, impacts on LAPD services during construction periods would be less than significant. Traffic generated by construction workers and trucks would occur primarily during off-peak 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, impacts associated with construction activities would be less than significant. The Proposed Project would introduce approximately 374 new permanent residents to the project site. The Proposed Project would include strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security	No mitigation measures are required.	Impacts to police protection services would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
would be controlled to limit public access. The building and layout design of the proposed structure also include crime prevention features, such as nighttime security lighting and secure parking facilities. All crime prevention features shall be approved by the LAPD prior to issuances of a building permit. Therefore, operational impacts would be less than significant. New persons introduced to the project site on a daily basis would not require any additional officers in order to maintain the current officer-to-population ratio in the Westchester-Playa del Rey Area. Therefore, as the Proposed Project would not result in a need for new officers to maintain the current officer-to-population ratio, it is not likely that any expansion, consolidation, or relocation of the Pacific Community Police Station would be needed. As buildout of the Proposed Project would not result in the demand for any new, expanded, consolidated, or relocated police facilities, impacts associated with the officer-to-population ratio would be less than significant. Emergency access to the project site would be provided by the existing and proposed street system. The Proposed Project would be required to be built according to code to ensure proper emergency access. Therefore, impacts on emergency access would be less than significant.		
PUBLIC SERVICES - SCHOOLS		
The Proposed Project would generate a net total of approximately 52 students, including 26 elementary school students, 13 middle school students, and 13 high school students over baseline conditions. None of the schools serving the project site are operating at or above capacity. The addition of 26 new elementary school students to Loyola Village Elementary School would not result in the school reaching or surpassing its capacity for students. Also, the addition of 13 middle school students and 13 high school students to Wright Middle School and	Because no significant school impacts have been identified, no mitigation measures are required. However, the City requires implementation of following standard measure to ensure that any impacts are minimized: J-4. The applicant shall be required to pay LAUSD	Impacts to school facilities and services would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Westchester High School would not result in either school reaching or surpassing their capacities for students. Further, pursuant to the California Government Code, payment of school facilities fees would, by law, mitigate any impacts resulting from buildout of the Proposed Project. As such, with payment of school facilities fees, impacts to school services as a result of the buildout of the Proposed Project would be less than significant.	developer school fees to the satisfaction of the administering agency.	
PUBLIC SERVICES – RECREATION AND PARKS		
As there are no existing residential units on the project site, the estimated number of additional residents generated is also the net increase in population that would create demand for parks and recreation facilities. The Proposed Project would include 58,437 square feet of common open space and recreation space. Under LAMC Section 12.21(G), the Proposed Project would be required to provide 28,275 square feet of open space.[1] With the provision of project recreation and open space and the payment of appropriate in-lieu fees, the Proposed Project would have a less than significant impact to park and recreation facilities	With payment of park fees pursuant to LAMC Section 21.10.3(a)(1), impacts would be less than significant and no mitigation measures are required.	With implementation of fees, impacts related to recreation and parks services would be less than significant.
PUBLIC SERVICES – LIBRARIES		
The Westchester-Loyola Village and Playa Vista Branch Libraries would serve the library needs of the Proposed Project. Based on the library-sizing criteria in the Los Angeles Public Library Branch Facilities Plan, both libraries serving the project would have enough square footage capacity to accommodate the additional residential population associated with the project. Therefore, project impacts related to library services would be less than significant.	Because no significant impacts to library service were identified, no mitigation measures are required.	Impacts to library services would be less than significant.

[1] *169 units having fewer than three habitable rooms x 100 sf = 16,900 sf. 91 units having three habitable room x 125 sf = 11,375 sf. 16,900 sf + 11,375 sf = 28,275 sf of open space required.*

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
TRAFFIC, TRANSPORTATION AND PARKING		
Trip Generation Trip counts were taken between March 18 and March 20, 2008. The Proposed Project would result in a net decrease of 307 daily trips, with an increase of 33 trips during the AM peak hour and a decrease of 32 trips during the PM peak hour. ***Vehicular Access*** Vehicular access, which would be shared with the adjacent Playa del Oro development, would be provided via one main driveway on Manchester Avenue and one service driveway on an alley way located south of the project site, which directly connects to Rayford Drive. Signs would be posted at the intersection of the alley and Rayford Drive to prohibit project-generated and other traffic from using the alley to travel through the community south of the project site. Ingress and egress to the subterranean parking structure would occur on the eastern and southern sides of the proposed development. ***Related Projects*** It was determined that 19 related projects in the surrounding communities and jurisdictions could potentially contribute significant traffic to the study intersections. The Proposed Project would not have a significant impact on any study intersection. Six of the seven study intersections would operate at acceptable levels of service (LOS), LOS D or better, during both the AM and PM peak hour. The remaining intersection would operate at LOS F during the AM peak hour.	K-1. A "No left-turn" sign for westbound traffic will be installed along the alley at Rayford Drive and a "No right-turn" sign for northbound traffic will be installed along Rayford Drive at the alley to prohibit cut-through traffic. The Proposed Project would not significantly impact any of the seven study intersections, the CMP network, or the study residential street segment. Other projects in the vicinity such as the Playa del Oro project on the adjacent site will be implementing mitigation measures such as improvements to Lincoln Boulevard and Manchester Avenue (Condition T-1 in Table IV.K-1) that will alleviate forecasted traffic increases such that levels of service are not significantly affected pursuant to the City's thresholds (see Table IV.K-4 and Table IV.K-11).	Impacts with respect to traffic, transportation, and parking would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Congestion Management Program The local Congestion Management Program (CMP) requires that all CMP intersections be analyzed where a project would likely add 50 or more trips during the peak hours. A review of the project trip distribution and net project traffic additions to the project vicinity shows that the Proposed Project would not add 50 or more trips during the AM and PM peak hours to any CMP monitored intersection. In addition, any CMP monitored freeway segment where a project is expected to add 150 or more trips in any direction during the peak hours is also to be analyzed. Based on the project trip distributions described previously, the Proposed Project is not expected to add 150 or more directional trips to any monitored freeway segment. Therefore, no significant, project-related impact would occur at any CMP monitored freeway location and no additional freeway analysis is necessary. *Analysis of Residential Street Traffic* A residential street traffic analysis was also conducted to determine the potential impact of project traffic on the residential street segment of Rayford Drive, south of 85th Street. Daily traffic counts were conducted on this residential street segment on April 10, 2008. This daily traffic volume was used as the basis for the residential street impact analysis. Development of the Proposed Project would not cause an increase in traffic on the residential street segment as there would be a net decrease in daily project trips when compared to the existing uses currently found on-site. ***Parking*** Parking for the Proposed Project would be provided in three levels of parking (one subterranean level, two aboveground levels) at a rate of 1.83 spaces per unit for a total of 475 parking spaces. The parking area would be constructed behind the joint		

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
live/work units with additional parking beneath the residential units. As discussed in Section IV.G. Land Use and Planning, the Proposed Project would require a total of approximately 406.5 resident parking spaces under the current LAMC regulations. Therefore, the 475 parking spaces provided by the Proposed Project would provide more than adequate parking to meet the requirements under LAMC. As such, Proposed Project impacts related to parking would be less than significant.		
UTILITIES-WATER		
The Proposed Project would result in a net increase in consumption of approximately 21,804 gallons per day (gpd) of water over baseline conditions. ***Water Supply*** The Proposed Project does not meet any of the criteria for SB 610 or SB 221; as such, a Water Supply Assessment is not required. The Los Angeles Department of Water and Power (LADWP) addresses issues of water supply in its Final Year 2005 Urban Water Management Plan (UWMP). Because the water consumption associated with the project is consistent with what would occur based on what the City has planned for the project site, the Proposed Project would be consistent with the UWMP. Therefore, the project's demand for water supply could be accommodated by the LADWP, and impacts related to water supply would be less than significant. ***Local Water Infrastructure*** No infrastructure deficiencies are known to occur in the project vicinity, and it is anticipated that the existing infrastructure system could serve the Proposed Project. Further, during the project's construction phase, the project applicant would be required to coordinate with LADWP to confirm water conveyance capacity and	Because no significant impacts to water service were identified, no mitigation measures are required. However, the City requires the following standard measures to ensure that impacts are less than significant: L-1. The landscaped irrigation system shall be designed, installed, and tested to provide uniform irrigation coverage for each zone. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets. Each zone (sprinkler valve) shall water plants having similar watering needs (do not mix shrubs, flowers and turf in the same watering zone). Automatic irrigation timers shall be set to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times shall be adjusted for all zones seasonally, reducing water times and frequency in the cooler months (fall,	Impacts related to water service would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
would be required to install any upgrades that would be necessary. Through this process, project impacts related to water conveyance infrastructure would be less than significant. ***Water Quality*** The Proposed Project would result in a net increase in water consumption of approximately 21,804 gpd over the existing uses. The net increase in water consumption by the Proposed Project represents approximately 0.04 percent of the remaining treatment capacity at Los Angeles Aqueduct Filtration Plant (LAAFP). As such, impacts to treatment capacity as a result of the Proposed Project would be less than significant. ***Fire Flow*** According to LADWP, a 10-inch water main is required to satisfy the required 4,000 gallons per minute (gpm) fire flow. Should it be determined that the existing water main infrastructure is unable to accommodate the estimated water consumption for the project during the project's construction phase, the project applicant would be required to coordinate with LADWP to confirm water conveyance capacity and would be required to install any upgrades that would be necessary, including those for fire flow. Through this process, project impacts related to fire flow would be less than significant.	winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property. The irrigation systems shall also 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; and • Use of landscaping contouring to minimize precipitation runoff. L-2. Drought-tolerant, low water consuming plant varieties shall be used to reduce irrigation water consumption. For a list of these plant varieties,	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	refer to Sunset Magazine, October 1988, "The Unthirsty 100," pp. 74-83, or consult a landscape architect. L-3. The Project Applicant shall use recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary). L-4. The Project Applicant shall install ultra-low-flush high-efficiency toilets (1.28 gallons/flush or less, includes dual flush), ultra-low-flush high-efficiency urinals (0.5 gallons/flush or less, includes waterless), and water-saving showerheads (2.0 gallons/minute or less). Low flow faucet aerators shall be installed on all sink faucets with a faucet flow rate of 1.5 gallons/minute or less. L-5. Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). Cooling towers shall be operated at a minimum of 5.5 cycles of concentration. L-6. The Project Applicant shall install domestic water heating systems located in close proximity to point(s) of use. Tank-less and on-demand water heaters shall be used as feasible.	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	L-7. The Project Applicant shall install high-efficiency clothes washers (water factor of 6.0 or less) where clothes washers are provided, and high-efficiency dishwashers (Energy Star rated) shall be installed where dishwashers are provided. Water conserving clothes washers and dishwashers are now available from many manufacturers. Water savings also represent energy savings, in that the water saved by these appliances is typically heated. L-8. The Project Applicant shall install onsite water recycling systems for wastewater discharge for commercial laundries, dye houses, food processing, certain manufacturing operations, etc. (subject to a payback threshold of five years or less). L-9. Single-pass cooling shall be prohibited. L-10. The Project Applicant shall install metering systems as follows: • All dwelling units shall have individual metering and billing for water use; and • All irrigated landscapes of 5,000 square feet or more require separate metering or submetering.	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
UTILITIES-SEWER		
The Proposed Project is anticipated to generate a net increase of approximately 18,590 gpd of wastewater over the baseline conditions. No sewer infrastructure deficiencies are known to occur in the project vicinity. During the project's construction phase, the project applicant would be required to coordinate with LABS to confirm sewer capacity availability and would be required to implement any upgrades that would be needed. Through this process, impacts related to wastewater conveyance infrastructure would be less than significant. Wastewater generated on the project site would be subsequently conveyed to HTP. The 18,590 gpd net increase in wastewater over the existing uses represents approximately 0.02 percent of the remaining capacity at HTP. Therefore, impacts to wastewater treatment capacity as a result of the buildout of the Proposed Project would be less than significant.	Because no significant impacts related to sewer service were identified, no mitigation measures are required.	Impacts related to sewer services would be less than significant.
UTILITIES-SOLID WASTE		
Construction Impacts Construction waste would be generated during demolition and construction activities. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials, which would generate approximately 47,976 tons of demolition/construction debris for the project. The Sunshine Canyon Landfill and the Chiquita Canyon Landfill have a combined remaining capacity of 147,000,000 tons. In accordance with historic recycling trends in the City and the incentives for recycling, most of the demolition/construction debris associated with the project likely would be recycled. However, conservatively assuming that none of the demolition/construction debris is recycled, the existing remaining landfill capacity would be adequate to accommodate the project. Therefore, project impacts related to landfill capacity as a	Because no significant impacts related to solid waste services have been identified, no mitigation measures are required. However, the City requires implementation of the following standard measures to minimize impacts: L-11. In compliance with City Ordinance 171,687, the construction contractor will provide space for recycling containers. L-12. In compliance with AB 939, the construction contractor shall only contract for waste disposal services with a company that recycles	Impacts to solid waste resources would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
result of demolition/construction would be less than significant. ***Operational Impacts*** Operation of the Proposed Project would result in ongoing generation of solid waste. Over the long-term, the Proposed Project would be expected to generate a net increase of approximately 384 pounds of solid waste per day (ppd) or 0.19 tons of solid waste over the baseline conditions. This net increase in solid waste represents approximately 0.002 percent of the remaining daily intake capacity, and approximately 0.002 percent of the total permitted daily intake at Sunshine Canyon Landfill. At Chiquita Canyon Landfill, this generation rate represents approximately 0.02 percent of the remaining daily intake capacity, and approximately 0.003 percent of the total permitted daily intake. Furthermore, operations within the City and the project site would continue to be subject to the requirements set forth in AB 939 requiring each city or county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The increase in solid waste generated by the Proposed Project would not result in the need for additional waste collection routes and recycling or disposal facilities. Therefore, impacts associated with solid waste service would be less than significant.	construction-related wastes. L-13. In compliance with AB 939, to facilitate the on-site separation and recycling of construction-related wastes, the construction contractor shall provide temporary waste separation bins on-site during construction. L-14. All waste shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood and vegetation. Non-recyclable materials/wastes must be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.	
UTILITIES-ELECTRICITY		
The Proposed Project would generate a net increase in electricity demand over the baseline conditions estimated at 1,055 kilowatt hours (KW-Hours). ***Electricity Supplies*** Energy conservation standards established by Title 24 of CCR would be incorporated into new buildings as part of the building permit process and thus reduce the amount of electricity consumed by the Proposed Project by addressing	Because no significant impacts related to electricity service have been identified, no mitigation measures are required. However, the City requires implementation of the following standard measures to minimize impacts: L-15. Windows shall be designed to reduce thermal gain and loss and thus cooling loads during warm weather, and heating loads during cool	Impacts to electricity services would be less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
insulation, glazing, lighting, shading, and water and space heating systems. The Applicant would be required to incorporate the energy conservation measures (refer to measures L-15 through L-19) into the project design and operation. As such, impacts to electricity supplies would be less than significant. ***Electricity Distribution System*** LADWP undertakes expansion and/or modification of electricity distribution infrastructure and systems to serve future growth in the City of Los Angeles as required in the normal process of providing electrical service. During the project's construction phase, the project applicant would be required to coordinate with LADWP to determine connection requirements and any upgrades that are needed (if any) would be implemented at that time. As such, impacts to electricity distribution infrastructure would be less than significant.	weather (e.g., tinting, double pane glass, etc.). L-16. Thermal insulation that exceeds requirements established by the State of California Energy Conservation Standards shall be installed in walls and ceilings. L-17. High-efficiency lamps shall be installed for all outdoor security lighting. L-18. Time control interior and exterior lighting shall be installed. These systems shall be programmed to account for variations in seasonal daylight times. L-19. Exterior walls shall be finished with light-colored materials and high-emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light-colored materials to reflect more light and thus increase lighting efficiency. L-20. If applicable, the Applicant shall coordinate with LADWP and fund the installation of the upgraded facilities as needed to maintain an adequate electricity distribution system and/or to connect the project site to the surrounding infrastructure.	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
UTILITIES-NATURAL GAS		
The Proposed Project would generate a net demand increase of 14,446 cubic feet (cf) of natural gas over the baseline conditions. ***Natural Gas Supplies*** The Applicant would be required to incorporate the energy conservation measures (refer to mitigation measures L-15 through L-19) into the project design and operation. With modern energy efficient construction materials, the Proposed Project would be consistent with the City's energy conservation standards also helping to reduce demand for natural gas. As such, impacts to natural gas supplies as a result of buildout of the Proposed Project would be less than significant. ***Natural Gas Distribution System*** According to the 2008 California Gas Report, SCG operates in an environment where interstate pipeline capacity exists in excess of anticipated demand. Therefore, there is adequate pipeline capacity to deliver natural gas to the City of Los Angeles.	Because no significant impacts related to natural gas service have been identified, no mitigation measures are required.	Impacts to natural gas supplies and infrastructure would be less than significant.

Source: Christopher A. Joseph & Associates, March 2010.

II. ENVIRONMENTAL SETTING

A. OVERVIEW OF ENVIRONMENTAL SETTING

This section provides a brief overview of the project site's regional and local setting. Additional descriptions of the environmental setting as it relates to each of the environmental issues analyzed in this EIR are included in the environmental setting discussions contained within Sections IV.A through IV.K. A list of related projects, which is used as the basis for the discussion of cumulative impacts in Section IV (Environmental Impact Analysis), is also provided.

Regional Setting

The project site is located in Los Angeles County, within the Westchester Community of the City of Los Angeles. The project site is situated approximately 0.5 miles north of the Los Angeles International Airport (LAX) (refer to Figure II-1, Regional and Project Vicinity Map). Regional access to the project site is provided by Lincoln Boulevard (State Route 1), located approximately 0.15 miles east of the project site, the Glenn Anderson Freeway (I-105), located approximately two and one half miles south of the project site, and the San Diego Freeway (I-405), located approximately two and three-quarter miles east of the project site.

Local Setting

The 3.03-acre (approximately 131,943 square feet) project site is located at the southeast corner of West Manchester Avenue and Rayford Drive and is located at an elevation of approximately 155 feet above mean sea level (msl) with a two to five percent slope trending southeast.[1] West Manchester Avenue and Lincoln Boulevard serve as the primary arterial roadways providing access to the project site. The project site is generally bounded by West Manchester Avenue to the north, Lincoln Boulevard to the east, Villanova Avenue to the south, and Rayford Drive to the west (refer to Figure II-1, Regional and Project Vicinity Map).

The project site is located within the Westchester-Playa del Rey Community Plan (Community Plan) area. Under the Community Plan, the project site is designated for "Community Commercial" land use. As discussed in Section IV.G, the western portion of the project site is currently zoned as [Q]C4-1-CDO (C4: Commercial with limitations and Multi-Family residential, Height District 1, and CDO: Loyola Village Community Design Overlay[2]) and the eastern portion of the project site is currently zoned as [Q]RAS4-1-CDO (RAS4: Residential/Accessory Services Zone, Height District 1, and CDO: Loyola Village Community Design Overlay). In addition, the project site is located within the Coastal Transportation

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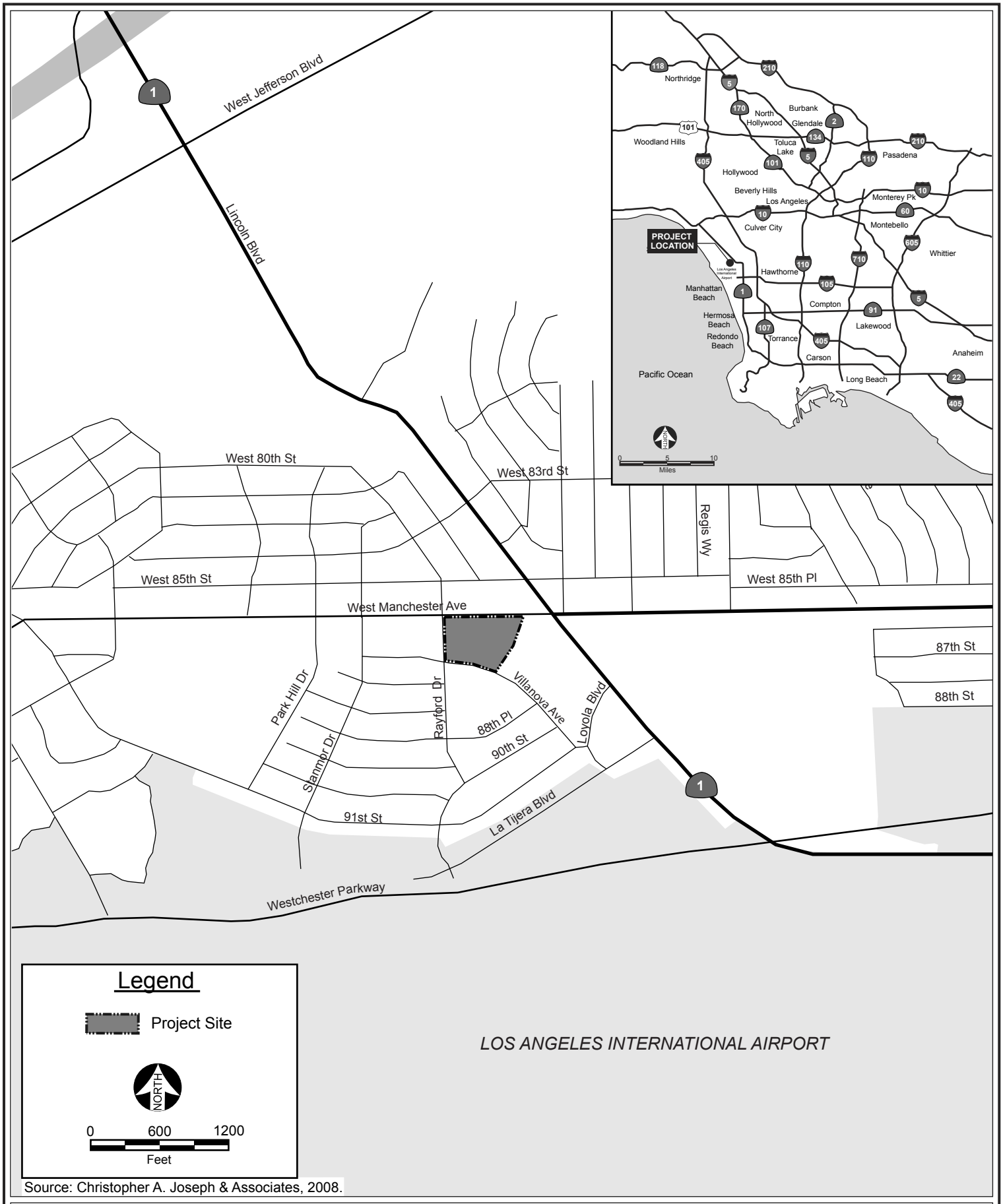
[1] *United States Department of the Interior, Geological Survey, Venice Quadrangle, California, Los Angeles Co., 7.5 Minute Series (Topographic), 1964, Photo Revised 1981, map.*

[2] *As discussed further in Section IV.G. Land Use and Planning, the project site is located within the Loyola Village Community Design Overlay district.*



Source: Christopher A. Joseph & Associates, 2008.

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Figure II-1
Regional and Project Vicinity Map

Corridor Specific Plan (Specific Plan) bounded by the City of Santa Monica on the north, Imperial Highway on the south, San Diego Freeway on the east, and Vista Del Mar on the west. As described in the Community Plan, the Specific Plan is a Transportation Plan implemented to fund specific transportation improvements due to transportation impacts generated by the area's projected new commercial development. Furthermore, the project site is also located within the Airport Corridor Boundary, which outlines the LAX boundary area where the Los Angeles World Airports can build.

Existing Land Uses

As shown by the aerial photograph in Figure II-2 and the existing project site views in Figure II-3, the western portion of the project site is currently developed with three existing structures which contain eight separate commercial uses, totaling 24,000 square feet, including Re/Max Realty, Sunflower Health Food Store, a Pilates/yoga studio, ADA Creation (a gift shop), a karate/martial arts studio, All Cities Real Estate, an automotive repair center, and Graphaids art supply store.

The eastern portion of the project site is currently vacant.[3] This portion of the project site was previously occupied by buildings associated with the former Furama Hotel. These buildings were demolished in 2006.

The western portion of the project site supports a total of five trees that meet the City's trunk diameter criterion and/or protected status. Two of the trees are Coast Live Oaks and three are mature ornamental trees, defined as non-protected species.[4]

Surrounding Land Uses

As shown in Figure II-2, the project site is located in a developed urban area. General land uses in the project vicinity include various commercial and multi-family uses.

North of the site, on the northeast corner of Manchester Avenue and Rayford Drive, is the Westchester Church of the Nazarene. Several multi-family uses, the Siam Restaurant, and a commercial use are also located north of the project site. On the northeast corner of Manchester Avenue and Lincoln Boulevard are a restaurant, bar, liquor store, and bank (see Figure II-4).

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[3] *In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site (the eastern portion of the current project site), which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project. See section III. Project Description, for a description of the Proposed Project.*

[4] *Playa Manchester Project Tree Report, August 2009, included as Appendix J to this Draft EIR.*

Source: Google Earth Pro and Christopher A. Joseph & Associates, 2008.

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Figure II-2
Existing Uses Map

View 1: View looking east across Rayford Drive towards the existing commercial uses on-site.

View 2: View from the project site looking towards the existing automotive use on-site.

View 3: View looking south across Manchester Avenue at the existing commercial uses on-site.

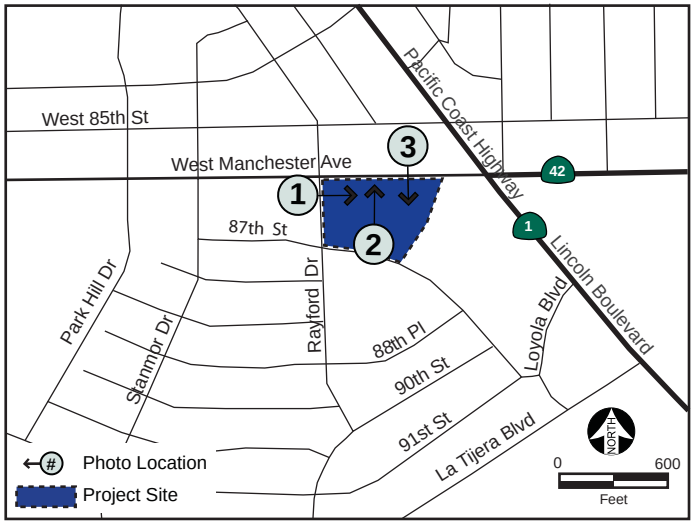

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure II-3
Views of Existing On-Site Land Uses
Views 1, 2 and 3

View 1: View looking north across Manchester Avenue towards the surrounding multi-family uses.

View 2: View looking northeast across Manchester Avenue at the commercial uses.

View 3: View looking southwest across Lincoln Boulevard towards the Playa del Oro mixed-use development.

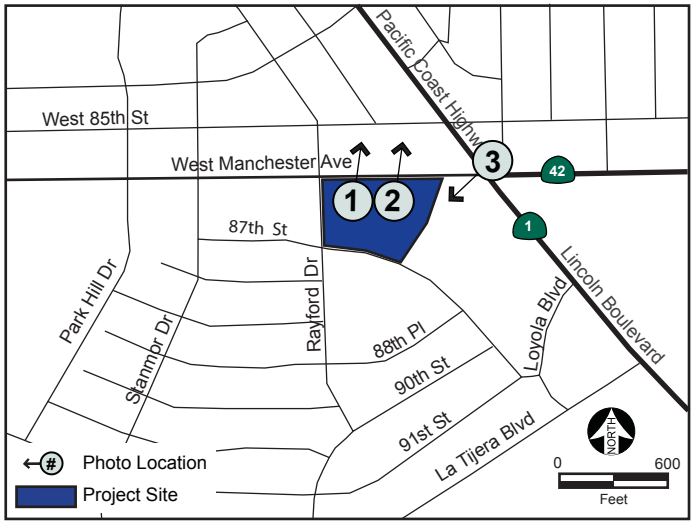

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure II-4
Views of the Surrounding Land Uses
Views 1, 2 and 3

East of the project site is the Playa del Oro mixed-use development, which is currently under construction (see Figures II-4, View 3 and Figure II-5, View 4). Further east of the project site, past the Playa del Oro development, is the Westchester Park and Recreation area. The Park contains a Senior Citizen Center, community swimming facilities, and a golf course.

Southeast of the project site is the Custom Hotel, a two-story parking structure, and several commercial uses including: a travel agency, art supply store, Ralphs Supermarket, bowling alley, diner, and retail store. Along the project site's southern edge are single-family homes and a residential community, south of which is the Loyola Village Elementary School located on the south side of Villanova Avenue (see Figure II-5).

To the west of the project site are a single-family residence and the Congregational Church of the Messiah and its associated surface parking (see Figure II-6).

View 4: View looking west across Lincoln Boulevard towards the Playa del Oro mixed-use development and the Custom Hotel.

View 5: View looking west across Lincoln Boulevard towards commercial uses, including a restaurant, art supply store, and Ralph's Supermarket.

View 6: View looking northeast across Villanova Avenue towards single-family homes. The Playa del Oro mixed-use development and the Custom Hotel are in the background.

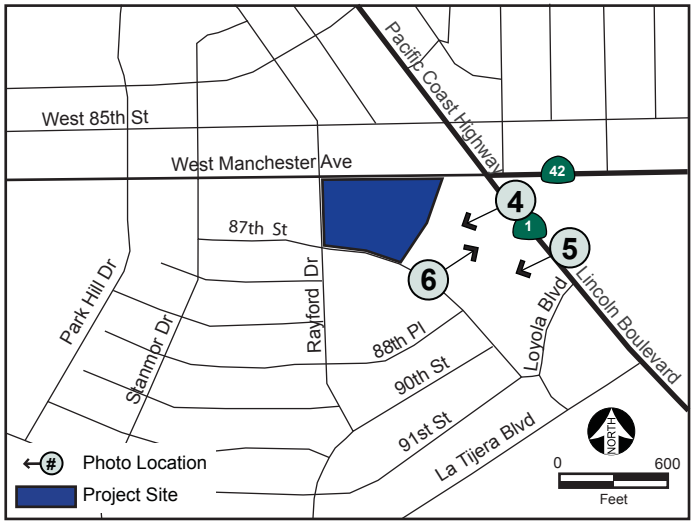

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure II-5
Views of the Surrounding Land Uses
Views 4, 5 and 6

View 7: View looking southwest across Rayford Drive towards the Congregational Church of the Messiah.

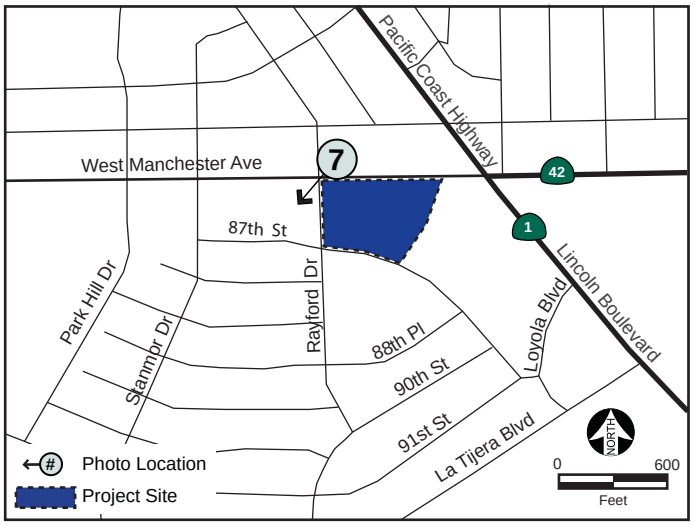

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure II-6
Views of the Surrounding Land Uses
View 7

B. RELATED PROJECTS

Sections 15126 and 15130 of the *State CEQA Guidelines* provide that EIRs consider the significant environmental effects of a Proposed Project as well as "cumulative impacts." "Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (*State CEQA Guidelines* Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (*State CEQA Guidelines* Section 15130 (b)(1)(A)).

All proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Proposed Project, are included in Table II-1 below. An analysis of the cumulative impacts associated with these related projects and the Proposed Project are provided under each individual environmental impact category in Chapter IV of this EIR. The locations of the related projects are shown in Figure II-7.

Table II-1
Playa Manchester Related Projects and Description

Map No.	Location (Address)	Size	Unit	Description
1	SWC Lincoln Blvd./ Manchester Ave.	Playa del Oro/Furama Redevelopment		
		539	du	Apartment
		27,000	sf	Retail
		(500)	rm	Hotel (to be removed)
		(10,420)	sf	Retail (to be removed)
		(10,590)	sf	Office (to be removed)
		(4,800)	sf	High-Turnover Restaurant (to be removed)
2	7215 W. Manchester Ave.[a]	4,850	sf	Walk-In Bank
3	6225 W. Century Blvd.	180	du	Hotel
4	7900 S. Loyola Blvd.	16	st	Daycare Center
5	7831 Sepulveda Blvd.	600	st	School Expansion
6	5401 Beethoven St.	420	st	Private School
7	8632 Sepulveda Blvd.	3,621	sf	Walk-In Bank
8	5550 Grosvenor Blvd.	208	du	Condominium
9	4500 Via Marina	120	du	Apartment (expansion)
10	Southern terminus of Fiji Wy. (Parcel 64)[b]	478	du	Multi-family Residential
		500	sf	Restaurant
		34	slip	Boat
		(224)	du	Apartment (to be removed)
11	West of Fiji Wy. Near Terminus Fisherman's Village[c] (Parcels 55/56/W)	132	rm	Hotel
		1,230	seat	Restaurant
		24,250	sf	Retail
		5,200	sf	Office
		26	slip	Boat
		(12,984)	sf	Retail/Commercial (to be removed)
		(16,149)	sf	Restaurant (to be removed)
		(17)	slip	Boat (to be removed)
12	West of Lincoln Blvd., North of Fiji Wy. (Parcels 50&83)	4,700	sf	Specialty Retail

Table II-1 (Continued)
Playa Manchester Related Projects and Description

Map No.	Location (Address)	Size	Unit	Description
13	12700 Braddock Dr.	134,557	sf	Warehouse
		1,357	sf	Office
		(58,323)	sf	University of CA Laundry Building (to be removed)
14	South of Jefferson Blvd., East of Lincoln Blvd.	Playa Vista Phase I		
		3,246	du	Condominium
		2,142,050	sf	Office
		25,000	sf	Retail
		1,129,900	sf	Production & Staging Support
		65,000	sf	Community Serving Uses
		(2,166)	du	Condominium
		(221,000)	sf	Office
		(12,500)	sf	Retail
15	South of Jefferson Blvd./ Westlawn Ave.[d]	Playa Vista Phase II		
		175,000	sf	Office
		2,600	du	Apartment
		150,000	sf	Shopping Center
		40,000	sf	Community Serving Uses
16	North side Fiji Wy., West of Admiralty Wy. (Parcel 52/GG)	345	Vessel	Dry Stack Storage Facility
		30	Vessel	Mast Up Storage Space
		1,500	sf	Sheriff Boatwright Facility
17	1 LMU Dr.[e]	7,800	st	Loyola Marymount University Master Plan
18	6161 W Centinela Ave.[f]	Carlyle Radisson		
		342,409	sf	Office
19	9204 Airport Blvd.[g]	Airport Blvd Carwash		
		1	site	Car Wash
		(15,251)	sf	Car Rental Facility (to be removed)

Note: du = dwelling unit; sf = square feet; st = students; rm = rooms

[a] *Traffic impact study for Bank of America project at Lincoln Boulevard/Manchester Ave., Crain & Associates, August 2008.*

[b] *Traffic analysis for a Proposed 478-unit Residential Development on Parcel 64 in Marina del Rey, Crain & Associates, January 2007.*

[c] *Traffic study for the Fisherman's Village Retail and Commercial Development Project, Hirsch Green Traffic Consultant, March 2007.*

[d] *Traffic analysis for the Village at Playa Vista Project, Kaku Associates, Inc. and Raju Associates, Inc., July 2003.*

[e] *No net increase of number of students or expansion of campus square footage. Therefore, no net increase trip generation for the project.*

[f] *Memorandum of Understanding (MOU) for the 9204 Airport Boulevard Carwash Project, Crain & Associates, March 19, 2008.*

Source: Crain & Associates, Traffic Impact Study for Residential Project at Lincoln Boulevard/Manchester Avenue (8601 Lincoln Boulevard), City of Los Angeles, June 23, 2008, p. 27-29.

Source: Crain & Associates, August 12, 2008.

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Figure II-7
Related Projects Location Map

III. PROJECT DESCRIPTION

A. PROJECT APPLICANT

The project applicant for the Playa Manchester Project is Decron Properties, Corp., 6222 Wilshire Boulevard, Suite 650, Los Angeles, CA 90048.

B. PROJECT LOCATION

The 3.03-acre project site is located at 7270 through 7298 West Manchester Avenue and 8624 Rayford Drive, which is at the southeast corner of the intersection of West Manchester Avenue and Rayford Drive, in the Westchester community of Playa Del Rey, within the City of Los Angeles (see Section II, Figure II-1, Regional and Vicinity Location Map).

C. PROJECT HISTORY

The project site is part of a larger site, the Lincoln-Manchester Property, owned by the Applicant, which is generally bounded by Manchester Avenue, Lincoln Boulevard, Loyola Boulevard, Villanova Avenue and Rayford Drive, and consists of approximately 13 acres (see Figure III-1, Project History). The southeast portion of the Lincoln-Manchester Property is developed with a retail center anchored by a 31,000 square foot supermarket, a bowling alley, and a two-level parking structure. The Applicant is currently redeveloping a portion of the Lincoln-Manchester property, with the construction of multi-family residential, retail, and restaurant uses at the southwest corner of Manchester Avenue and Lincoln Boulevard pursuant to approvals granted by the City Council on May 19, 2004 in Case No. CPC 2003-5554-VZC-SPR (Council File 04-0443). Specifically, the City Council granted Site Plan Review approval for the construction, use, and maintenance of a mixed-use project consisting of 539 new multi-family residential units, 27,600 square feet of retail and renovation of the former Furama Hotel tower (currently named the Custom Hotel).[1] In addition to the Site Plan Review approval, the City Council also adopted Ordinance No. 175,996 on May 19, 2004 effecting a Vesting Zone Change from C2-1 and P-1 to (T)(Q)RAS4-1 for the approximately 6.8 acre portion of the Lincoln-Manchester Property located at the southwest corner of Manchester Avenue and Lincoln Boulevard. As part of the approval of the Zone Change and Site Plan Review, the City Council found that the potential environmental impacts of the mixed-use project and the renovation of the former Furama Hotel tower can be reduced to a less than significant level with the implementation of specified mitigation measures and adopted a Mitigated Negative Declaration (ENV 2002-7628-MND).

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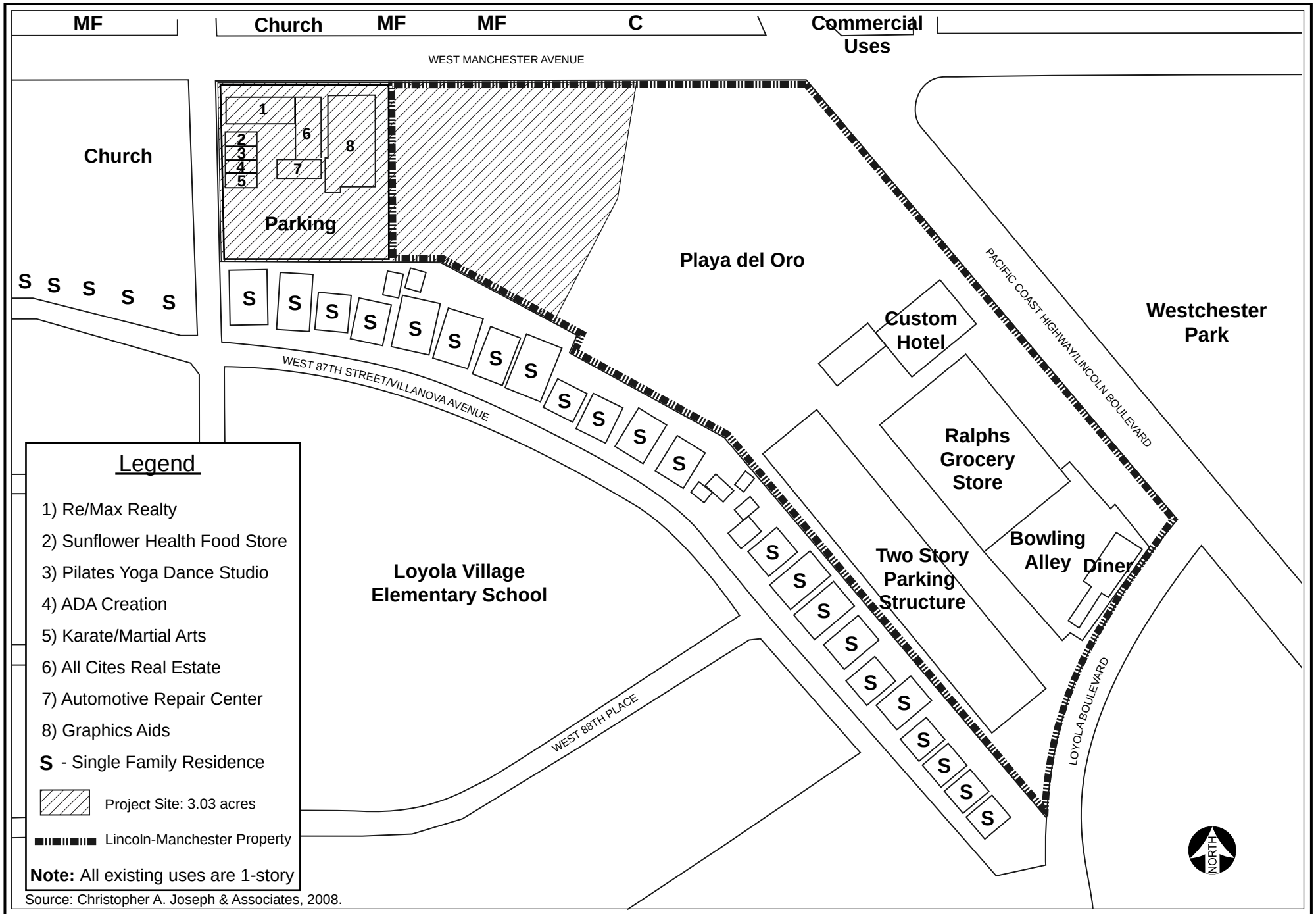
[1] *The May 19, 2004 Site Plan Review approval included the approximate 0.75-acre site developed with the former Furama Hotel tower building. The Applicant no longer owns the former Furama Hotel tower property, which has been redeveloped with a 250-room stand alone hotel, the Custom Hotel.*



Source: Christopher A. Joseph & Associates, 2008.

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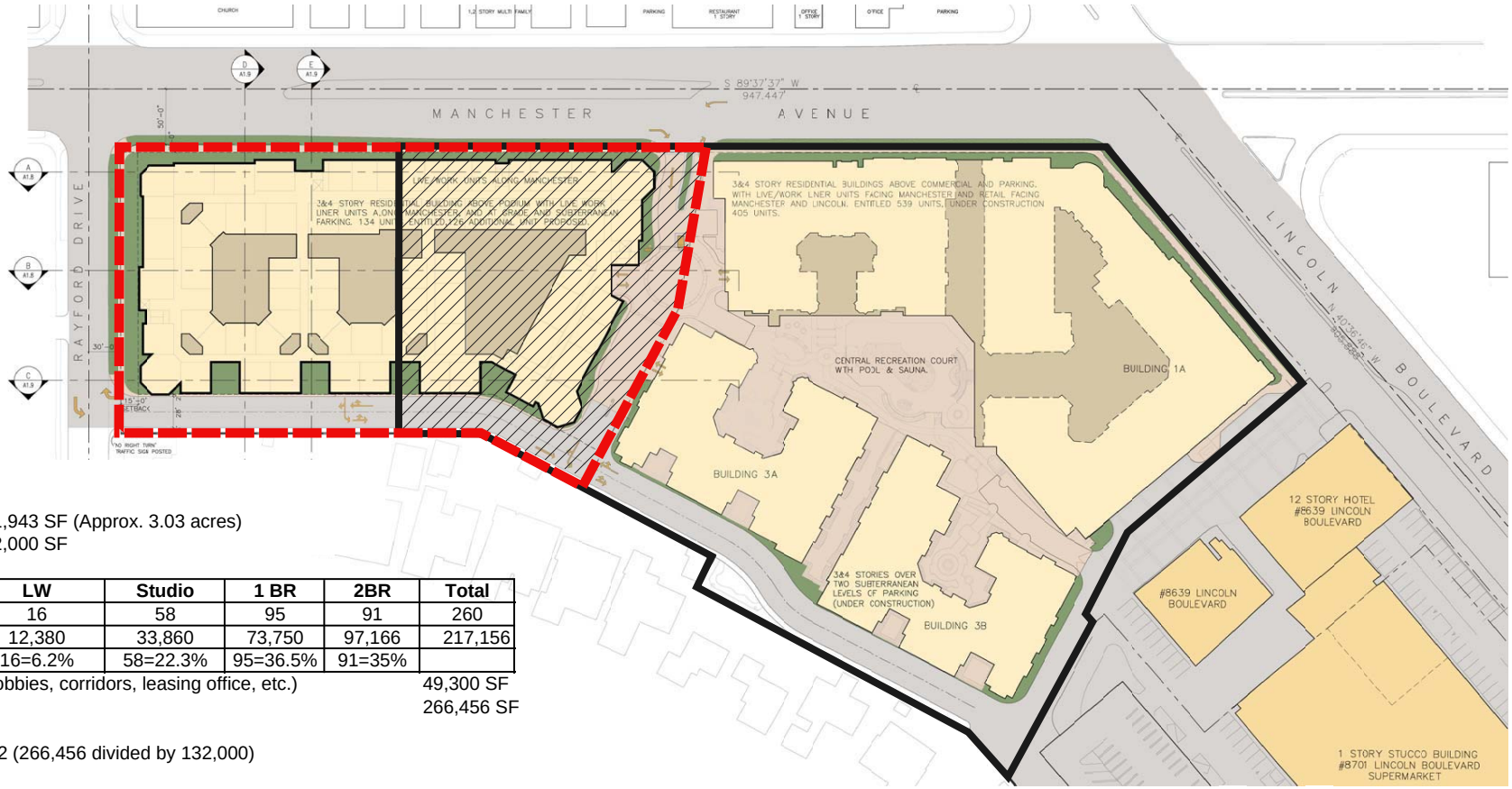
Figure III-1
Project History

At the time of the Site Plan Review and Ordinance approvals for the mixed-use project (now known as Playa del Oro), the Applicant owned the approximately 1.12-acre property located at the northeast corner of Manchester Avenue and Rayford Drive and occupied by a real estate office (Remax) and other commercial uses (7298 Manchester Avenue, 7296 Manchester Avenue, and 8624 Rayford Drive). Subsequently, the Applicant acquired the approximate .33-acre property located adjacent to the Playa del Oro site at 7280 Manchester Avenue and formerly occupied by Gerald's Hardware. The Applicant now proposes to combine these sites (7298 Manchester Avenue, 7296 Manchester Avenue, 8624 Rayford Drive, and 7280 Manchester Avenue) with an approximately 1.58-acre portion of the Playa del Oro site previously approved for 134 units to form a larger, approximately 3.03-acre, project site.

As approved, the 539-unit Playa del Oro project was to be constructed in three separate buildings. Two of the buildings, which will contain 405 dwelling units, are currently under construction. However, construction of the third building, which would contain 134 units, has not commenced. The 134-unit building is considered to be part of the baseline conditions in this Draft EIR because it has already undergone review under CEQA and any potential environmental effects have been mitigated pursuant to the mitigation measures required for the Playa del Oro project. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which comprises 260 dwelling units, resulting in a net increase of 126 dwelling units. Therefore, this Draft EIR analyzes the incremental effects of constructing an additional 126 dwelling units on the expanded site.

D. PROJECT CHARACTERISTICS

As shown in Figure III-2, Conceptual Site Plan, the Proposed Project involves the demolition of 24,000 square feet of retail uses and the construction of a four- to six-story mixed-use project containing a total of 260 dwelling units, including 16 ground floor joint live/work units, all located above three levels of parking, of which one level would be subterranean. As shown in Figures III-3 thru III-8, the topography of the project site slopes slightly downwards towards the east, along Manchester Avenue, and downwards towards the north, along Rayford Drive. As shown in Table III-1, the mixed-use building would be approximately 266,456 square feet and would include approximately 1,400 square feet of multi-purpose room/gym area, as well as a pool and landscaped common areas (refer to Figure III-9, Podium Level). The Proposed Project would include a landscaped buffer and pedestrian access along Manchester Avenue. Per the City of Los Angeles Department of Transportation (LADOT), the Proposed Project would also require a roadway dedication along its Manchester Avenue frontage in accordance with City Street-Width Standards (see Appendix I to this Draft EIR). It is anticipated that the Proposed Project would be completed in one phase with construction beginning approximately in January 2011, occurring over an approximate 24-month period.



PROJECT SUMMARY:

Site Area: 131,943 SF (Approx. 3.03 acres)
Net Site Area: 132,000 SF

Unit	LW	Studio	1 BR	2BR	Total
Total	16	58	95	91	260
Total Unit Area (sf)	12,380	33,860	73,750	97,166	217,156
Total Unit; Total in %	16=6.2%	58=22.3%	95=36.5%	91=35%	

Common Area: (includes lobbies, corridors, leasing office, etc.) 49,300 SF
Total Building Area: 266,456 SF

Floor Area Ratio: 2.02 (266,456 divided by 132,000)

PARKING SUMMARY:

						Total
Required	Studio	1 stall/ unit	x	58	=	58
	L/W	1.5 stall/ unit	x	16	=	24
	1 BD	1.5 stall/ unit	x	95	=	142.5
	2 BD	2 stall/ unit	x	91	=	182
						406.5

Provided	Direct Access		Tandem		Total
	Top Level	109	22		131
	Motor Ct. Level	142	60		202
	Subterra	80	62		142
	Total	331	144		**475**

Total Guest Parking: 65 stalls

Legend

- Playa del Oro
- Playa Manchester
- Vacant portion of Playa del Oro now to be included with Playa Manchester

NORTH

0 80 160
Feet

Source: Van Tilburg Banvard & Soderbergh, AIA. September 19, 2008

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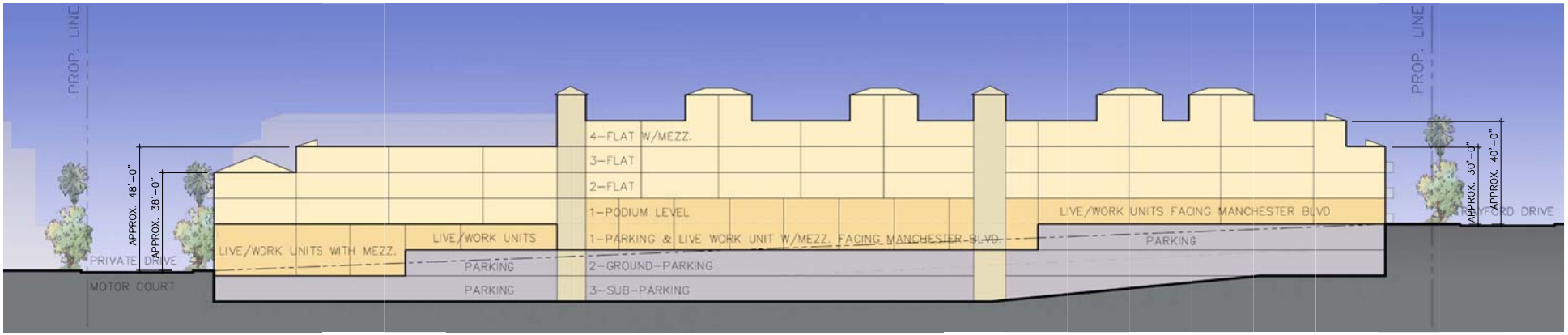
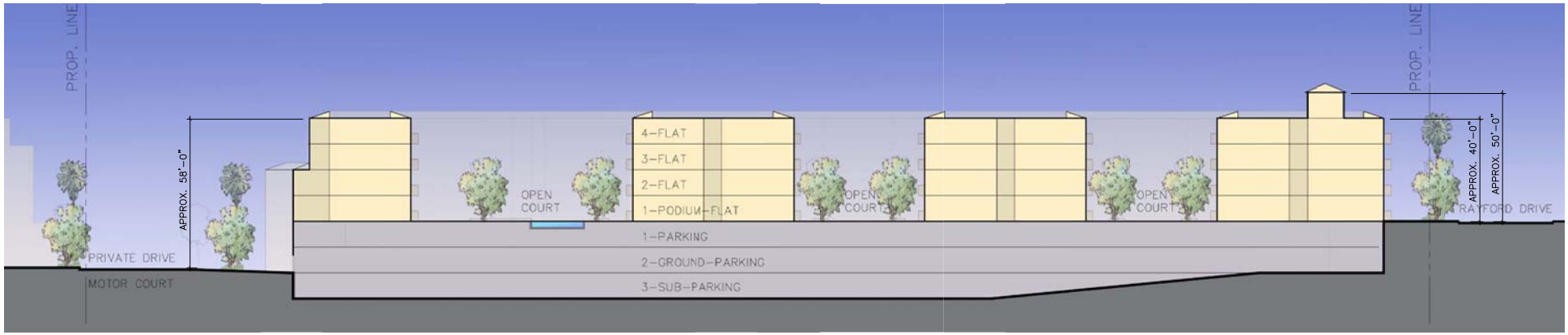
Figure III-2
Conceptual Site Plan



BUILDING SECTION - A



BUILDING SECTION - B

Source: Van Tilburg Banvard & Soderbergh, AIA. September 19, 2008

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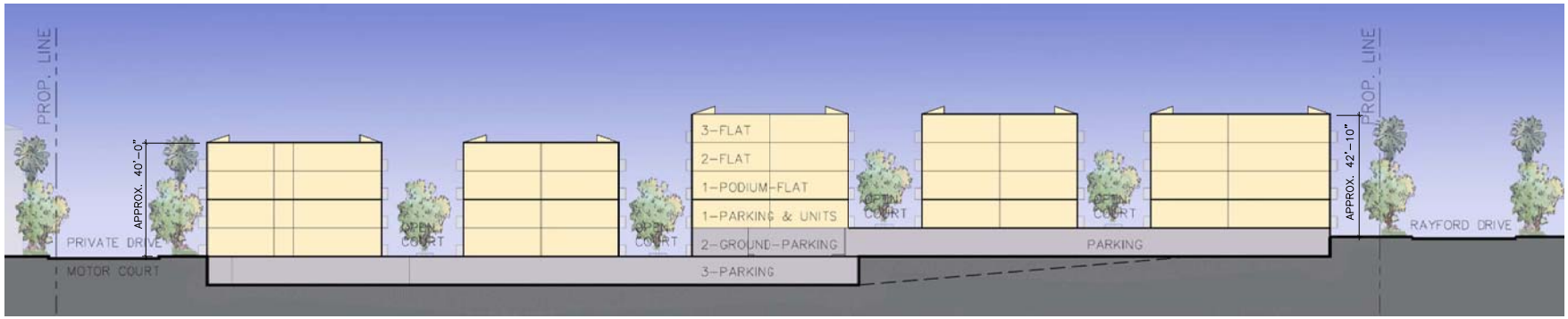
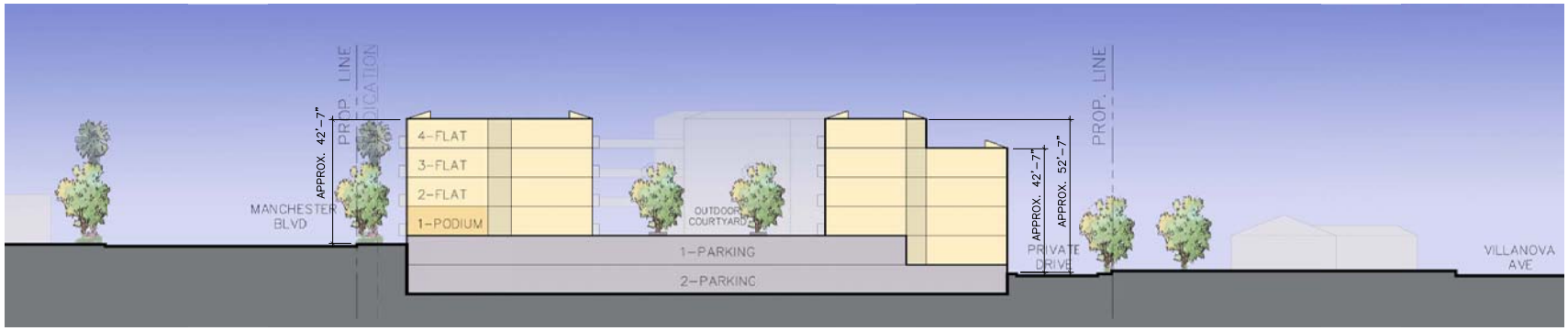
Figure III-3
Building Cross-Sections
A and B



BUILDING SECTION - C



BUILDING SECTION - D

BUILDING SECTION - E

Source: Van Tilburg Banvard & Soderbergh, AIA. September 19, 2008.

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Figure III-4
Building Cross Sections
C Through E

MANCHESTER AVENUE ELEVATION

ENTRY COURT ELEVATION

Source: Van Tilburg Banvard & Soderbergh, AIA. September 19, 2008.

REAR DRIVE ELEVATION

RAYFORD DRIVE ELEVATION

Source: Van Tilburg Banvard & Soderbergh, AIA. September 19, 2008.

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Figure III-6
Conceptual Elevations

Source: Van Tilburg Banvard & Soderbergh, AIA., 2009.

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Figure III-7
Rendering of Rayford Drive Elevation

Source: Van Tilburg Banvard & Soderbergh, AIA., 2009.

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Figure III-8
Rendering of Villanova Avenue Elevation

Source: Van Tilburg Banvard & Soderbergh, AIA. September 19, 2008.

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Figure III-9
Podium Level

Residential and Joint Live/Work Units

As shown in Table III-1, the Proposed Project would develop 260 dwelling units to include 58 studio units, 95 one-bedroom units, 91 two-bedroom units, and 16 joint live/work units. The joint live/work units would be located on the ground level (podium level) of the proposed building, fronting Manchester Avenue, and would include direct public access from Manchester Avenue. The fourth floor residential units that face Manchester Avenue would include mezzanines above the top floor with private terraces. Each mezzanine would be a maximum of 500 square feet.

Table III-1
Proposed Project Summary

Use	Square Feet (SF)	Total (UNITS)
Residential and Joint Live/Work Units		
Studio	546	16
Studio	593	40
Studio + Mezzanine	702	2
1 BR	770	92
1 BR + Den	970	3
2 BR	1,022	65
2 BR + Den	1,222	8
2 BR	1,050	8
2 BR + Den	1,256	10
Live/Work	1,022	3
Live/Work + Mezzanine	910	1
Live/Work + Mezzanine	702	9
Live/Work Flat	770	2
Live/Work Flat	546	1
Subtotal	***217,156***	***260***
Recreation	1,400	N/A
Common Areas (includes lobbies, corridors, leasing office, etc.)	47,900	N/A
Total Building Area	**266,456**	**260**
Parking		
Top Level	N/A	131
Motor Court Level	N/A	202
Subterranean	N/A	142
Total Parking Area	157,604	475

Source: Van Tilburg Banvard & Soderbergh, September 19, 2008.

Parking and Access

The parking area would be constructed directly behind the live/work units with additional parking below the residential units. Parking would be provided in three levels (two above-ground and one subterranean) at a rate of 1.83 spaces per unit for a total of 475 parking spaces. The parking plan layout is summarized

in Table III-2, Parking Plan Layout. A total of 407 parking spaces would be required for the Proposed Project under the current City of Los Angeles Municipal Code (LAMC) regulations. The Project proposes a total on-site parking supply of 475 spaces, consistent with the amount required by the LAMC.

Table III-2
Parking Plan Layout

Unit Type	Rate (stall/unit)	Total (Units)	Total (Stalls)
Required			
Studio	1 stall/unit	58	58
Live/Work	1.5 stall/unit	16	24
1 BR	1.5 stall/unit	95	142.5
2 BR	2 stall/unit	91	182
		Total Required Parking	**406.5**
Parking Location	**Direct Access**	**Tandem Stalls**	**Total (Stalls)**
Provided			
Top Level	109	22	131
Motor Court Level	142	60	202
Subterranean Level	80	62	142
Total	***331***	***144***	**475**
Source: Van Tilburg Banvard & Soderbergh, September 19, 2008.			

Vehicular access would be shared with the Playa del Oro development and would be provided via existing driveways on Manchester Avenue and Rayford Drive, allowing access to and from the parking area on the east and south sides of the structure, respectively. Refer to Figure III-10, Proposed Vehicle Circulation Plan. Additionally, the Proposed Project would include adequate bicycle parking.

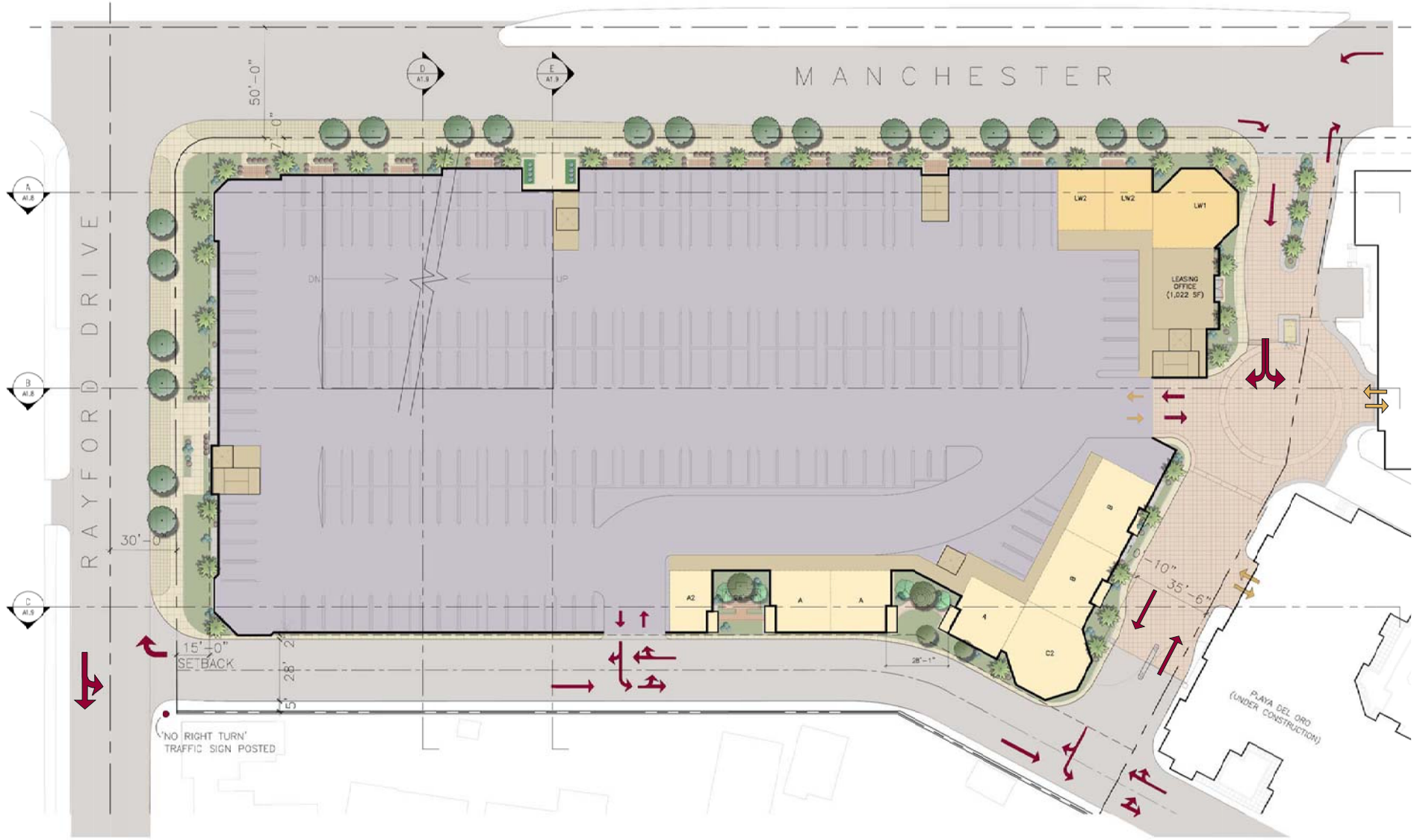
Design Concept

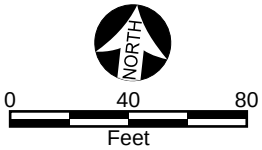
As shown in Figure III-3 and Figure III-4, the proposed building would range in height from 30’0” to a maximum height of 58’0” above finished grade due partially to the site’s natural slope. The natural slope of Manchester Avenue ranges from approximately 165 feet above mean sea level (msl) at the corner of Rayford Drive and decreases to approximately 144 feet above msl to the east on the property. Furthermore, the natural slope of Rayford Drive ranges from approximately 165 feet above msl and decreases to approximately 148 feet above msl at the southern end of the project site.

To further reduce massing, the fifth level of the building would be set back from the fourth level facing the southern property line, which abuts single-family residential uses. As such, the maximum height for the south-facing side of the structure would be five-stories and approximately 52’7” high. No part of the parking garage, other than the access point, would be visible from any of the streets.

Open Space and Landscaping

As shown in Figure III-2, the Proposed Project would include landscaping along the perimeter of the project site as well as internally throughout the development. There would be a total of approximately





Source: Van Tilburg Banvard & Soderbergh, AIA. September 19, 2008.

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Figure III-10
Proposed Vehicle Circulation Plan

58,437 square feet of common open area, including 35,159 square feet of landscaped area. Open space that would be available to the residents includes approximately 1,400 square feet of gym/multi-purpose area on the ground floor (podium level), a swimming pool, outdoor courtyard, and private balconies.

Roadway Dedication

Per the traffic assessment issued by LADOT, included as Appendix I to this Draft EIR, the Proposed Project would require a seven-foot roadway dedication along its Manchester Avenue frontage.

E. PROJECT OBJECTIVES

The objectives of the Proposed Project are as follows:

- To establish infill development providing housing to serve the local community in a manner consistent with the RAS4 zone;
- To maintain the opportunity for a commercial presence along Manchester Avenue by providing joint live/work units;
- To provide a development that is compatible and complementary with surrounding land uses;
- To provide adequate parking facilities to serve the proposed development residents and guests; and
- To redevelop the project site in a manner that is financially feasible.

F. DISCRETIONARY ACTIONS

In order to permit development of the Proposed Project, the following discretionary land use approvals have been requested by the Applicant:

- Zone Change. In order to accommodate the Proposed Project, the Applicant seeks a vesting zone change for the Project Site from [Q]C4-1-CDO, on the western portion and [Q]RAS4-1-CDO (Residential/Accessory Services), on the eastern portion, to (T)(Q)RAS4-1-CDO for the entire project site; and

- Site Plan Review. Pursuant to LAMC section 16.05-D.2, the Applicant requests Site Plan Review approval for the Proposed Project. This Site Plan Review would supersede the Site Plan Review granted in CPC 2003-5554 VZC-SPR with respect to the Project Site.

This EIR serves as an advisory document, compliant with CEQA, intended to offer additional guidance to the lead agency for all discretionary actions associated with the Proposed Project. This EIR is also 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:

- South Coast Air Quality Management District; and
- Regional Water Quality Control Board, Los Angeles Region.

IV. ENVIRONMENTAL IMPACT ANALYSIS
A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

1. INTRODUCTION

This section addresses potential environmental resources for which the Proposed Project, Playa Manchester, would not result in significant impacts related to the environmental topics listed below. California Public Resources Code Section 21003(f) states:

> *"…it is the policy of the State that…all persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment."*

This policy is reflected in *State CEQA Guidelines* (Guidelines) Sections 15126.2(a), "(a)n EIR shall focus on the significant environmental effects of the Proposed Project" and 15143, "(t)he EIR shall focus on the significant effects on the environment."

Although the Guidelines allow use of an Initial Study to document project effects which are less than significant, Guidelines Section 15063(a) provides that an Initial Study is not required if the Lead Agency can determine that an EIR will clearly be required for the project. Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant, and were therefore not discussed in detail in the EIR. Because the City of Los Angeles Department of City Planning, the Lead Agency for the Proposed Project under CEQA, was able to determine that an EIR would clearly be required for the Proposed Project, an Initial Study was not prepared. The statements required by Guidelines Section 15128 are included in this Section.

The Lead Agency has determined that the Proposed Project would not have the potential to result in significant impacts with regard to the following environmental issue areas: agricultural resources, biological resources, geology and soils, and mineral resources. The rationale for each of these determinations is presented below. The Lead Agency also determined, based on the environmental characteristics of the project area and review of existing data and relevant programs, that implementation of the Proposed Project may have the potential to create environmental impacts in the remaining environmental issue areas. The analyses of these environmental issues are contained in the remainder of Chapter IV of this EIR.

2. AGRICULTURAL RESOURCES

The Playa Manchester project site is located in a heavily urbanized area in the Westchester community of the City of Los Angeles and does not include any State-designated agricultural lands. The Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively referred to as "Farmland"), as shown on the maps prepared pursuant to the Farmland

Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Westchester area is not included in the Important Farmland Category and the adjacent properties are not utilized for agricultural purposes.[1]

According to the Important Farmland in California map of 2004, the project site is on land that is considered "Out of Survey Area.[2] The western portion of the project site is currently developed with three existing structures which contain eight separate commercial uses, including: two real estate offices; a health food store/acupuncture office; a pilates/yoga studio; a gift shop; a karate/martial arts studio; an automotive service center; and an art supply store. The eastern portion of the project site is currently vacant. Furthermore, the project site is zoned [Q]C4-1-CDO (C4: Commercial with limitations and Multi-Family residential, Height District 1, and Community Design Overlay district[3]) and [Q]RAS4-1 (RAS4: Residential/Accessory Services Zone, Height District 1, and Community Design Overlay district), and is not designated for use as agricultural land pursuant to the maps prepared for the California Farmland Mapping and Monitoring Program.[4] Additionally, the project site is not under a Williamson Act Contract.[5] Therefore, development of the Proposed Project would not convert any farmland to a non-agricultural use.

3. BIOLOGICAL RESOURCES

The western portion of the site is currently occupied by three one-story structures, which contain eight separate retail uses; the eastern portion of the site (adjacent to the Playa del Oro project) is vacant. The project site is located in an urbanized area, and does not contain any species identified as a candidate, sensitive, or special status species in regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The western portion of the project site supports a total of five trees which meet the City's trunk diameter criterion and/or protected status. Implementation of the Proposed Project would require the removal of two Coast Live Oaks and three

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[1] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland Map, 1998, Map.*

[2] *California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Important Farmland in California, 2004, Map, website: http://www.consrv.ca.gov/DLRP/fmmp/overview/survey_area_map.htm; accessed June 25, 2008.*

[3] *As discussed in Section IV.G. Land Use and Planning, the project site is located within the Loyola Village Community Design Overlay district.*

[4] *California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Important Farmland in California, 2004, Map, website: http://www.consrv.ca.gov/DLRP/fmmp/overview/survey_area_map.htm; accessed June 25, 2008.*

[5] *California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Important Farmland in California, 2004, Map, website: http://www.consrv.ca.gov/DLRP/fmmp/overview/survey_area_map.htm; accessed June 25, 2008.*

mature ornamental trees, defined as non-protected species having a 12 inch diameter (caliper) or more at four and one half (4.5) feet above natural grade (Diameter at Breast Height – DBH) (refer to Appendix J, *Playa Manchester Project Tree Report*, dated August 2009). City of Los Angeles Protected Tree Ordinance No. 177,404 provides that a protected species tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. The Ordinance also requires that for each protected species tree removed, a minimum of two trees of the same species (minimum 15 gallon size) shall be planted and that the size and number of the replacement trees shall approximate the value of the trees to be replaced. In addition, a bond must be posted to guarantee the survival of trees which would be maintained, replaced or relocated to assure the existence of continuously living trees for a minimum of three years from the date the bond was posted or the trees were replaced or relocated. Further, the City Planning guidelines require that desirable mature ornamental trees (i.e., those with a DBH of 12" and over) be replaced at a 1:1 ratio. To reduce potentially significant impacts to protected tree species and non-native tree species which are at least 12 inches in diameter which would be removed by the Proposed Project, the mitigation measures listed below shall be implemented.

The project site is located in an urbanized area in the Westchester community of the City of Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the project site.[6] Therefore, implementation of the Proposed Project would not result in any adverse impacts on riparian habitat or other sensitive natural communities.

Review of the National Wetlands Inventory identified no protected wetlands on the project site or in the immediate area.[7] Therefore, the project site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act and no impacts on riparian or wetland habitats would occur with buildout of the Proposed Project.

As discussed, the project site has no riparian or wetland habitats and no significant ecological areas through or on the project site. As the project site has been previously disturbed by heavy urban development, there are no wildlife corridors on or through the project site. Buildout of the Proposed Project would not result in the interference of the movements of any migratory fish species or any other migratory wildlife species. As such, the buildout of the Proposed Project would not interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. There would be no impacts with the development of the Proposed Project.

The project site and its vicinity are not part of or included in any adopted California Department of Fish and Game (CDFG), U.S. Fish and Wildlife Service (USFWS) Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, State, or federal habitat conservation plans.[8,9]

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[6] *City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Significant Ecological Areas, September 1, 1996.*

[7] *National Wetlands Inventory, U.S. Fish & Wildlife Service, website, http:www.nwi.fws.gov, accessed March 20, 2008.*

[8] *California Department of Fish and Game. 2006. California Natural Diversity Database, website http://www.dfg.ca.gov/biogeodata/cnddb/, September 12, 2008.*

As such, no impacts to habitat conservation plans would occur as a result of the buildout of the Proposed Project.

As discussed, the Proposed Project would not result in impacts on sensitive natural communities, including riparian or wetland habitats; migratory wildlife corridors or native wildlife nursery sites; or habitat conservation plans. As such, with implementation of Mitigation Measures A-1 through A-6, impacts related to biological resources would be less than significant.

Mitigation Measures

A-1. Prior to the issuance of a grading permit, the Project Applicant shall provide a Mitigation Planting Plan to compensate for the loss of two Coast Live Oaks, and three mature ornamental trees. The Mitigation Planting Plan shall include a 2:1 replacement of Coast Live Oaks with a minimum 24-inch box size (i.e. a minimum of four new 24-inch box Coast Live Oaks), and a 1:1 replacement of mature non-protected species with a minimum 24-inch box size (i.e. a minimum of three new 24-inch box ornamental trees). The plantings may occur at project entry points, common areas, or along the Manchester Avenue right-of-way.

It is understood that this Mitigation Planting Plan would be only a part of the overall project landscape plans, which should also include additional trees and understory plantings of climate-adapted plant material.

All planting plans shall be to the satisfaction of the City of Los Angeles Urban Forestry Division of the Bureau of Street Services, the Department of Planning and the Advisory Agency. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

A-2. When planted in or adjacent to vehicular use areas the genus or genera of the tree(s) shall provide a minimum crown of 30'-50'. Please refer to City of Los Angeles Landscape Ordinance (Ord. No. 170,978), Guidelines K - Vehicular Use Areas.

A-3. Removal of all trees in the public right-of-way shall require the approval of the Board of Public Works.

A-4. The project applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the Advisory Agency guaranteeing the survival of trees required to be maintained, replaced or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three (3) years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner

[9] *U.S. Fish & Wildlife Service, Habitat Conservation Plans, http://ecos.fws.gov/conserv_plans/servlet/gov.doi.hcp.servlets.PlanReport, September 12, 2008.*

post a new tree bond to the satisfaction of the Bureau of Engineering. Subsequently the original owner's bond may be exonerated.

A-5. The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Any bond required shall be in a sum estimated by the City Engineer to be equal to the dollar value of the replacement tree or of the tree which is to be relocated. In determining value for these purposes, the City Engineer shall consult with the Advisory Agency and shall also consult the evaluation of trees guidelines approved and adopted for professional plantsmen by the International Society of Arboriculture, the American Society of Consulting Arborists, the National Arborists Association and the American Association of Nurserymen, and other available, local information, or guidelines.

A-6. Prior to the exoneration of the bond, the owner of the project site shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the trees were properly replaced, the date of the replacement and the survival of the replacement trees for a period of three years.

4. CULTURAL RESOURCES

Historic Resources

There are no known historic resources on or adjacent to the project site. There are currently three single-story structures existing on the western portion of the project site; the eastern portion of the project site is currently vacant. According the Los Angeles County Office of the Assessor, the oldest building on the western portion of the project site, the Graphaids art supply store, was constructed in 1964.[10] The remaining structures on the western portion of the project site were constructed in 1989.[11] Therefore, none of the structures meet the minimum fifty-year age requirement for consideration as a landmark at the national or state levels. Additionally, none of the on-site or adjacent buildings meet the criteria for designation under the California Register of Historical Resources, nor are they identified as a California Historical Landmark or listed on the National Register of Historic Places, National Register Information System (NRIS).[12,13,14] Furthermore, the closest City of Los Angeles Historic-Cultural Monuments are the

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[10] *Los Angeles County Office of the Assessor, Property Maps and Data, website: http://maps.assessor.lacounty.gov/mapping/viewer.asp, July 27, 2009.*

[11] *Los Angeles County Office of the Assessor, Property Maps and Data, website: http://maps.assessor.lacounty.gov/mapping/viewer.asp, August 7, 2009.*

[12] *California Register of Historical Resources, website: http://www.parks.ca.gov/?page_id=21747, July 27, 2009.*

[13] *California Office of Historic Preservation, California Historical Landmarks, California Historical Landmarks Listed by County, Los Angeles, website: http://www.parks.ca.gov/?page_id=21427, July 27, 2009.*

[14] *California Office of Historic Preservation, National Register, National Register Information System, Search by Location, Search by State and City, website: http://www.nr.nps.gov/nrloc1.htm, July 27, 2009.*

Loyola Theater, located at 8610 South Sepulveda Boulevard, approximately 1.25 miles east of the project site, and the Los Angeles International Airport Theme Building, located at 201 Center Way, approximately one mile southeast of the project site.[15] Therefore, no project impact on historical resources would occur.

5. GEOLOGY AND SOILS

A Geotechnical Engineering Investigation Report was prepared for 7250-7270 West Manchester Avenue (Playa del Oro site). The Geotechnical Engineering Investigation Report is contained in Appendix K to this Draft EIR. The Playa del Oro site is directly adjacent to the project site and therefore is comprised of similar subsurface conditions, including regional faulting, seismic activity, and liquefaction conditions.

The project site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. However, there are no active surface fault traces identified by the State, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, known to be present on the project site.[16,17] The project site is not located within a designated Alquist-Priolo Zone.[18] No known or potentially active faults pass through the project site.[19] The fault closest to the project site is the active Newport Inglewood Fault, located 3.64 miles the east of the project site, just east of the San Diego Freeway (I-405).[20] The City of Los Angeles Seismic Safety Element does include the Newport Inglewood Fault within a Fault Rupture Study Area. In addition, the City of Los Angeles Uniform Building Code, updated since the 1994 Northridge Earthquake, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. As such, impacts related to ground rupture from known earthquake faults would be less than significant.

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[15] *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic-Cultural Monuments Listing, City Declared Monuments, website: http://www.preservation.lacity.org/files/HCM%20Database%20Updated%20113007.pdf, accessed April 21, 2008.*

[16] *Active faults are classified by the State Division of Mines and Geology as faults showing evidence of surface displacement within the last 11,000 years.*

[17] *City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Alquist-Priolo Special Study Zones and Fault Rupture Study Areas in the City of Los Angeles, 1996.*

[18] *City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Alquist-Priolo Special Study Zones and Fault Rupture Study Areas in the City of Los Angeles, 1996.*

[19] *Geotechnical Engineering Investigation, Proposed Apartment Building, 7250 – 7270 West Manchester Avenue, Playa Del Rey, California, Prepared by Geotechnologies, Inc., October 11, 2004.*

[20] *United States Geological Survey, Earthquake Hazards Program, Quaternary Fault and Fold Database of the United States, Interactive Fault Map, website: http://earthquake.usgs.gov/regional/qfaults/, accessed April 21, 2008.*

As with all properties in the seismically active Southern California region, the project site is susceptible to ground shaking during a seismic event. The project site is located west of the Newport Inglewood Fault Zone.[21] Potential impacts from seismic ground shaking are present throughout Southern California and would be of comparable intensity at the project site as it would be for large parts of the City of Los Angeles and the region. The Proposed Project would be required to comply with existing codes which reduce seismic risks to an acceptable level; thus, the Proposed Project would have a less than significant impact with regard to seismic ground shaking.

According to the Environmental and Public Facilities Maps of the City Planning Department of the City of Los Angeles, the project site is not located within a potentially liquefiable area.[22] Furthermore, a liquefaction analysis of the soils underlying the project area was performed indicating that these soils would not be prone to liquefaction during 475-year return period ground motion.[23] As such, buildout of the Proposed Project would not expose people or structures to adverse impacts related to liquefaction. No impacts with respect to liquefaction would result.

The project site contains gently varying topography but no slopes adequate to support landslide conditions. The project site is not classified by the City of Los Angeles as being within a landslide hazard area.[24] Additionally, development must comply with building regulations set forth by City Building Codes, which require site analysis and remedial measures of unstable slopes prior to development. Therefore, the Proposed Project would not expose people or structures to adverse effects resulting from landslides and no project impacts would occur.

The project site is relatively flat and subterranean excavation would be limited to that necessary for the installation of the foundation, utilities, and subterranean parking. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavation, and fills.

The area surrounding the project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Proposed Project. During construction, the Proposed Project would be required to prevent the transport of sediments from the project site by

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[21] *Environmental and Public Facilities Maps, Los Angeles City Planning Department: Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, September 1, 1996.*

[22] *City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Areas Susceptible to Liquefaction in the City of Los Angeles, September 1, 1996.*

[23] *Geotechnical Engineering Investigation, Proposed Apartment Building, 7250 – 7270 West Manchester Avenue, Playa Del Rey, California, Prepared by Geotechnologies, Inc., October 11, 2004.*

[24] *City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Landslide Inventory and Hillside Areas in the City of Los Angeles, September 1, 1996.*

stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in a Storm Water Pollution Prevention Program (SWPPP), which is required to be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Storm Water Regulations. The implementation of the required construction BMPs would ensure that soil erosion impacts would be less than significant.

Long-term operation of the Proposed Project would not result in substantial soil erosion or loss of topsoil. The majority of the project site would be covered by a structure and by paving while the remaining portions of the project site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Proposed Project. With implementation of operational BMPs (in compliance with NPDES requirements) long term impacts related to erosion or loss of the top soil would be less than significant.

The project site is not known to be in an area susceptible to liquefaction.[25] Areas prone to liquefaction tend to have both alluvial soil and ground water levels close to the surface, which create expansive soil. The on-site soils are very low in expansion range.[26] Safe construction will be assured through compliance with the City of Los Angeles Building Code, which includes building foundation requirements appropriate to site conditions. As such, no impacts with respect to unstable or expansive soils are anticipated.

The project site is located in a developed urban area in the Westchester community of the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary, nor are any proposed as part of the Proposed Project. As the use of septic tanks or alternative wastewater disposal systems would not be required, no impact with respect to this issue would occur.

6. MINERAL RESOURCES

The Playa Manchester project site is not located within an area containing significant mineral deposits (Mineral Resource Zone 2 Areas MR-Z) or a surface mining district.[27] The project site is currently zoned [Q]C4-1-CDO (C4: Commercial with limitations and Multi-Family residential, Height District 1, and CDO: Community Design Overlay district) and [Q]RAS4-1-CDO (RAS4: Residential/Accessory Services Zone, Height District 1, and CDO: Community Design Overlay district), and no classified or designated mineral deposits of statewide or regional significance are known to occur on or near the project site.

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[25] *Environmental and Public Facilities Maps: Areas Susceptible to Liquefaction in the City of Los Angeles, Los Angeles City Planning Department, September 1, 1996.*

[26] *Geotechnical Engineering Investigation, Proposed Apartment Building, 7250 – 7270 West Manchester Avenue, Playa Del Rey, California, Prepared by Geotechnologies, Inc., October 11, 2004.*

[27] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

The project site is not located in oil field or drilling areas as designated by the City of Los Angeles.[28] Additionally, the project sites are located outside of any City of Los Angeles oil drilling or surface mining supplemental use districts. Furthermore, no oil wells or mineral operations currently exist on-site. Therefore, the Proposed Project would not cause the permanent loss of, or access to any significant oil resources and no impacts on oil or mineral resources would occur.

[28] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Oil Field and Oil Drilling Areas in the City of Los Angeles, September 1996.*

IV. ENVIRONMENTAL IMPACT ANALYSIS
B. AESTHETICS
1. VIEWS

INTRODUCTION

This section evaluates the potential impacts of the Proposed Project on aesthetics, views and vistas, light and glare, and shade and shadows in the project area. "Aesthetics" refers to visual resources and the quality of what can be seen or overall visual perception of the environment, and may include such characteristics as building height and mass, development density, design character, and landscaping. "Views" refers to visual access and obstruction of prominent visual features, including both specific visual landmarks and panoramic vistas. Lighting issues address the effects of nighttime illumination and daytime glare on adjacent land uses. Shading issues are concerned with the shading effects of shadows cast by existing or proposed structures upon adjacent land uses. This section includes a depiction of the shadows that would be cast by the Proposed Project and cumulative shadows cast by the Proposed Project, the existing development, and other related development that occurs in the future near the project site. This section also includes an assessment of whether project-specific and cumulative shadows would cast onto shadow-sensitive receptors in excess of the City's threshold for shadow impacts.

ENVIRONMENTAL SETTING

Existing Visual Character

Project Site

The project site is located in the Westchester community of the City of Los Angeles. The project site is approximately 3.03 acres and is bound by Manchester Avenue to the north, the Playa del Oro development to the east, several single-family residences to the south, and Rayford Drive to the west (see Figure II-1, Regional and Project Vicinity Map).

The topography of the project site is moderately sloped downward to the southeast. The western portion of the project site is currently developed with three commercial structures totaling approximately 24,000 square feet (sf) of development. The existing on-site uses include: Re/Max Realty, Sunflower Health Food Store, a Pilates/yoga studio, ADA Creation (a gift shop), a karate/martial arts studio, All Cities Real Estate, an automotive repair center, and Graphaids art supply store. All existing uses on the project site are one-story in height. Development of the project site has occurred continuously over the last century. Thus, the project site consists of buildings of varying age and architectural style; there is a lack of uniformity in design among nearby development.

The eastern portion of the project site is currently vacant.[1] This portion of the project site was previously approved for the construction of a 3- and 4-story, 134-unit residential building pursuant to Case No. CPC 2003-5554-VZC-SPR.

Landscaping consists of six ornamental and street trees located along Manchester Avenue, Rayford Drive, and nine trees, two of which are potentially protected Coast Live Oak species, throughout the project site as well as ornamental bushes and shrubs. Figures IV.B-1 through IV.B-3 show views of the project site's existing uses.

Surrounding Locale

The Westchester community is generally characterized by a mix of urban uses. The immediate area surrounding the project site is developed with low- to medium-density, single-family and multi-family residential structures, two churches, a restaurant, an elementary school, and a construction site. Surrounding development generally ranges from one to two stories in height. Figures IV.B-4 through IV.B-6 show views of the surrounding uses.

North of the site, on the northeast corner of Manchester Avenue and Rayford Drive, is the Westchester Church-Nazarene. Several multi-family uses, a restaurant, and a commercial use are also located north of the project site. On the northeast corner of Manchester Avenue and Lincoln Boulevard are a restaurant, bar, liquor store, and bank (see Figure II-7).

East of the project site is the five-story Playa del Oro mixed-use development which is currently under construction (see Figures II-7, View 3 and Figure II-8, View 4). Further east of the project site, past the Playa del Oro development, is the Westchester Park and Recreation area. The Park contains a Senior Citizen Center, community swimming facilities, public library, other public buildings, and a golf course.

Southeast of the project site is the 12-story Custom Hotel, a two-story parking structure, and several commercial uses including: a travel agency, art supply store, Ralphs supermarket, bowling alley, diner, and retail store. Along the project site's southern edge are single-family homes and a residential community, south of which is the Loyola Village Elementary School located on the south side of Villanova Avenue (see Figure II-8).

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[1] *In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site (the eastern portion of the current project site), which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project. See section III. Project Description, for a description of the Proposed Project.*

View 1: View looking south across Manchester Avenue toward the existing commercial uses on the project site.

View 2: View looking southeast across Manchester Avenue toward the project site.

View 3: View looking south across Manchester Avenue toward the graded portion of the project site.

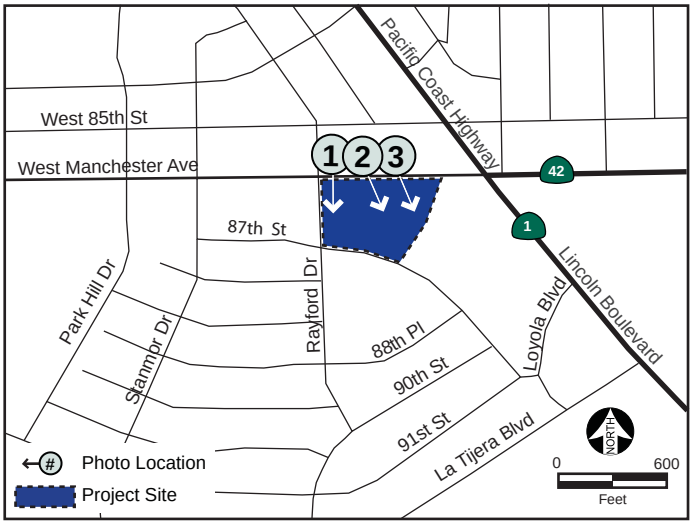

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure IV.B-1
Existing On-Site Uses
Views 1, 2 and 3

View 4: View looking north along Rayford Drive toward the project site.

View 5: View looking northeast across the project site. The on-site auto mechanic can be seen.

View 6: View looking east across the project site. The on-site auto mechanic is visible to the left and the adjacent Playa del Oro project site is visible in the background.

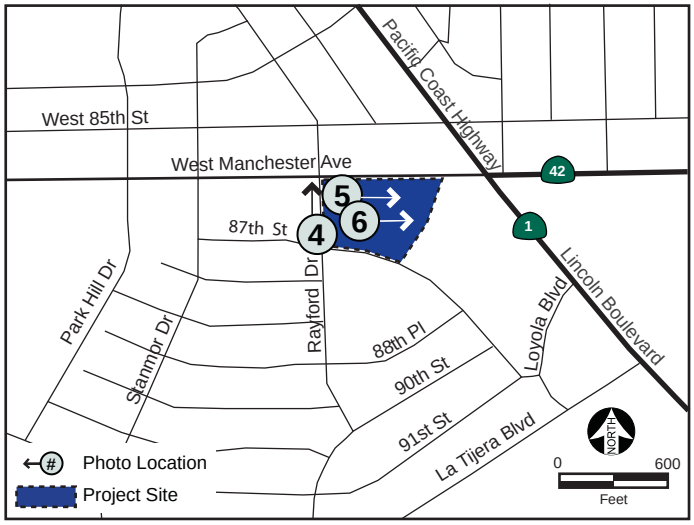

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure IV.B-2
Existing On-Site Uses
Views 4, 5 and 6

View 7: View of the internal courtyard associated with the on-site commercial structures.

View 8: View looking east across Rayford Drive toward the existing commercial uses on the project site.

View 9: View looking southeast across Rayford Drive toward the project site.

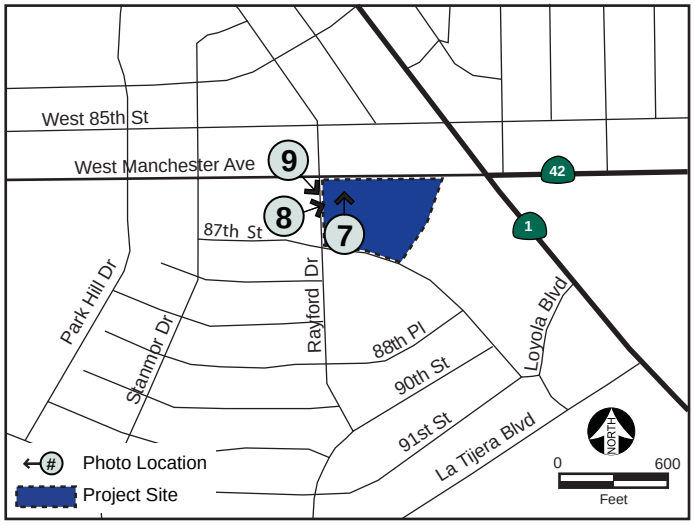

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure IV.B-3
Existing On-Site Uses
Views 7, 8 and 9

View 1: View looking northwest across Manchester Avenue toward a nearby multi-family residential structure.

View 2: View looking northeast across Manchester Avenue toward a church and several multi-family residential structures.

View 3: View looking northeast across Manchester Avenue toward the nearby Siam Restaurant.

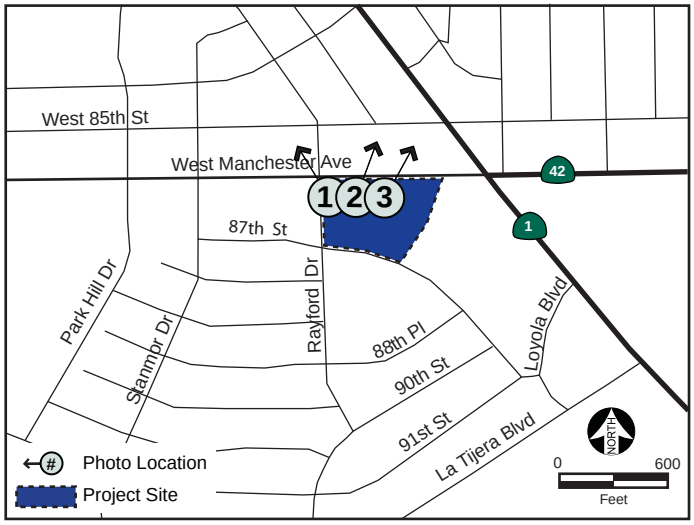

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure IV.B-4
Surrounding Uses
Views 1, 2 and 3

View 4: View looking west across Rayford Drive toward the Congregational Church of the Messiah.

View 5: View looking northwest along Villanova Avenue at the adjacent single-family residential neighborhood.

View 6: View looking southwest across the intersection of Rayford Drive and Villanova Avenue at the adjacent single-family residential neighborhood.

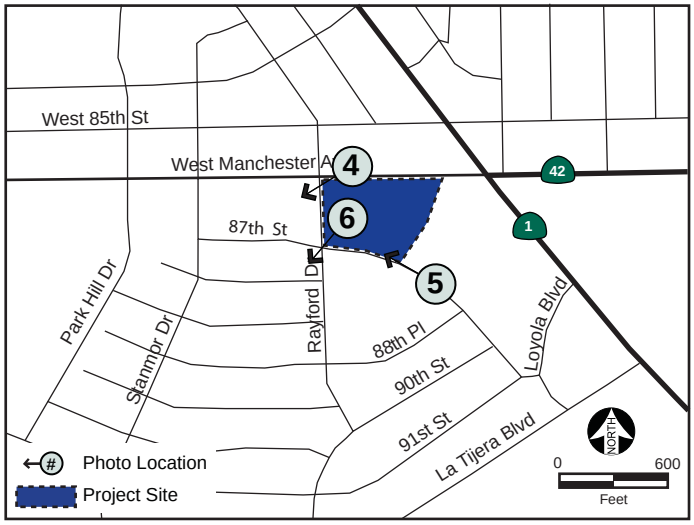

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure IV.B-5
Surrounding Uses
Views 4, 5 and 6

View 7: View looking southwest across the project site's existing surface parking lot. A single-family residential neighborhood can be seen in the background.

View 8: View looking southwest across Lincoln Boulevard towards the Playa del Oro mixed-use development.

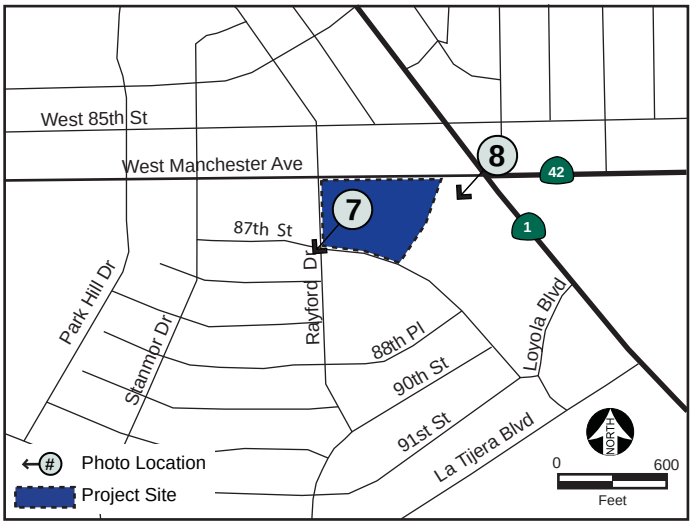

PHOTO LOCATION MAP

Source: Christopher A. Joseph & Associates, 2008.

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Figure IV.B-6
Surrounding Uses
Views 7 and 8

To the west of the project site are a single-family residence and the Congregational Church of the Messiah with its associated surface parking (see Figure II-9).

Scenic Resources

There are no State-designated scenic highways adjacent to the project site or in the project area. The nearest City-designated scenic highway to the project site are Culver Boulevard between Lincoln Boulevard and Vista del Mar, and Vista del Mar between Culver Boulevard and Imperial Highway, located approximately 1.14 miles northwest and 1.48 miles west, respectively.[2] Due to the location of the project site in relation to both Culver Boulevard and Vista del Mar, the topography of the project area, and existing intervening development, the project site is not visible from either of these two designated scenic highways. Additionally, the project site does not contain any valued view resources such as rock outcroppings or historic buildings. While there are two native Coast Live Oaks on the project site, (protected under Los Angeles Municipal Ordinance 177,404) neither tree is in an aesthetically pleasing condition (refer to Appendix J, *Playa Manchester Project Tree Report*, dated August 2009) and as they are in planters behind the existing retail development they cannot be seen from any of the surrounding areas. Therefore, these trees do not constitute a scenic resource.

Significant visual resources in the area include views of the Ballona Wetlands, approximately 0.65 miles northwest of the project site; and views from the coastal bluffs, approximately 0.5 miles northwest of the project site; as well as historic resources in the area. The nearest historic resources to the project site include the Loyola Theater, approximately 1.25 miles east of the project site and the Los Angeles International Airport Theme Building, approximately one mile south of the project site (see Section IV.A. Impacts Found to be Less Than Significant, Subsection 4. Cultural Resources). However, due to the topography of the project area and the surrounding development, no significant visual resources are visible across the project site.

Existing Viewsheds

Viewsheds refer to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by development that has become a prominent visual component of the area. Public views are those which can be seen from vantage points which are publicly accessible, such as street, freeways, parks, and vista points. These views are generally available to a greater number of persons than 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, particularly if a project complies with the zoning and design guidelines applicable to the site. In the project area, the existing viewsheds are defined by a mix of low- to mid-rise residential and commercial uses. There are no scenic resources of value visible from the project site or from the properties adjacent to the project site. As such, the existing viewsheds are defined primarily by existing urban development.

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[2] *City of Los Angeles, Department of City Planning, Transportation Element of the General Plan, Map E – Scenic Highways, website: http://cityplanning.lacity.org, accessed April 17, 2008.*

Views of and Toward the Project Site

The project site is moderately sloped downward to the southeast. The western portion of the project site is developed with three commercial structures, including seven retail uses and an auto-mechanic use. All existing uses are one story in height. Ornamental trees are located along the sidewalks of both Manchester Avenue and Rayford Drive and are dispersed throughout the project site. The eastern portion of the project site is currently vacant.

Views through the Project Site

The project site is located in a fully developed urban environment within the City of Los Angeles. There are no prominent visual resources located within the vicinity of the project site. Views of the Playa del Oro construction site are available through the project site looking easterly from Rayford Drive and southeasterly from Manchester Avenue. No views of visually prominent scenic resources are available through the project site because of the arrangement of the existing on-site uses and surrounding development.

Light and Glare

Ambient light consists primarily of natural light conditions and the light emanating from existing structures and security lighting. The project site contains approximately three structures and a surface parking lot with on-site lighting primarily for security purposes and sign illumination. Ambient lighting emanating from the project site contributes to the moderate to high ambient lighting level in the project area. Lighting associated with the surrounding uses in the project vicinity consists of light generated by vehicle headlights, street lights, and commercial and residential uses along Manchester Avenue, Rayford Drive, and Lincoln Boulevard. The areas to the east, in particular around the intersection of Manchester Avenue and Lincoln Boulevard, generally experience higher ambient lighting levels.

Glare is largely a daytime phenomenon, occurring when sunlight is reflected off the surfaces of buildings, objects (e.g., vehicle windshields), or by vehicle headlights on adjacent roadways. Excessive glare not only restricts visibility but also increases the ambient heat reflectivity in a given area. The existing surface parking lot on the project site, when occupied with vehicles, can be a source of glare from sunlight reflecting off windshields. The on-site buildings are one story in height and do not contain expansive areas of glass from which to reflect light.

City of Los Angeles Sign Regulations

The City of Los Angeles regulates the placement, construction, and modification of all exterior signs and sign support structures through Division 62 (Building Code) of the Los Angeles Municipal Code (LAMC). Building permits must be obtained from the Department of Building and Safety for any proposed signs and electrical permits must be obtained for a sign illuminated by electrical lighting. Specific Municipal Code requirements and restrictions are dependent upon signage type; however, general constraints on design, construction, materials, potential for hazards to traffic, and determination of such hazards are applicable.

Loyola Village Community Design Overlay

The project site is located within the Loyola Village Community Design Overlay (CDO) District and is subject to signage regulations contained therein. The Loyola Village CDO, adopted July 2009, provides design guidelines within the Loyola Village area to enhance the visual identity of the district area as well as encourage pedestrianism. A more thorough analysis of the Proposed Project's compliance with the Loyola Village CDO's design guidelines and standards is provided in Section IV.G. Land Use and Planning.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Proposed Project could have a potentially significant aesthetic impact if it were to result in one or more of the following:

(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 within a state scenic highway;

(c) Substantially degrade the existing visual character or quality of the site and its surroundings; or

(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

(a) The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;

(b) The amount of natural open space to be graded or developed;

(c) The degree to which proposed structures in natural open spaces would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;

(d) The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;

(e) The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements;

(f) The degree to which the project would contribute to the area's aesthetic value;

(g) Applicable guidelines and regulations;

(h) The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);

(i) Whether the project affects views from a designated scenic highway, corridor, or parkway;

(j) The extent of obstruction (e.g., total blockage, partial interruption; or minor diminishment);

(k) The extent to which the project affects recognized view available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point;

(l) The change in ambient illumination levels as a result of project sources; and

(m) The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

Project Impacts

Scenic Resources

Project development would alter the appearance of the project site, with construction of a four- to six-story mixed-use building containing a total of 260 dwelling units, including 16 ground floor joint live/work units. The project site does not contain any scenic resources such as rock outcroppings or historic buildings, and no State-designated scenic highways are located adjacent to or within view of the project site.[3] The two nearest State-designated scenic highways are Culver Boulevard between Lincoln Boulevard and Vista del Mar, and Vista del Mar between Culver Boulevard and Imperial Highway, located approximately 1.14 miles northwest and 1.48 miles west of the project site, respectively.[4] However, as discussed, the project site is not visible from either of these scenic highways due to the topography of the area and existing intervening development.

As discussed above, the Proposed Project would not affect views from a designated scenic highway, corridor, or parkway; nor would it substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings.

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[3] *City of Los Angeles, Department of City Planning, Transportation Element of the General Plan, Map E – Scenic Highways, website: http://cityplanning.lacity.org, accessed April 17, 2008.*

[4] *City of Los Angeles, Department of City Planning, Transportation Element of the General Plan, Map E – Scenic Highways, website: http://cityplanning.lacity.org, accessed April 17, 2008.*

Scenic resources in the project area include the Ballona Wetlands, views from the coastal bluffs, and nearby historic resources. However, as previously discussed, none of these scenic resources are visible from or across the project site. Therefore, impacts on scenic resources would be less than significant.

Views of the Project Site

The Proposed Project would remove the existing 24,000 square feet of development on the western portion of the project site and develop approximately 266,456 square feet of residential and ancillary uses over the entire project site. The proposed development would substantially change the current appearance of project site while also increasing the amount of development on-site. The proposed development would be visible from the surrounding roadways as well as from the various commercial, retail, residential, educational, and religious uses that line them. Views of the project site would be available from more off-site locations than at present because of the increased height and mass of the Proposed Project compared to the existing uses. Figures IV.B-7 and IV.B-8 shows renderings of the Proposed Project from Rayford Drive and Villanova Avenue.

The Proposed Project would be consistent with the urbanized character of the surrounding area, including the residential developments along Manchester Avenue, Rayford Drive, and Lincoln Boulevard, though built at a higher intensity than most of the nearby development. The buildout of the Proposed Project would introduce new structures with a height and massing that would be generally larger than most of the surrounding uses, which are one to two stories in height. However, at between three and five stories in height, the Proposed Project would be generally consistent in height and mass with the four- and five-story Playa del Oro development currently under construction directly adjacent to the east, and the three-story multi-family residential structure on the northwest corner of Manchester Avenue and Rayford Drive, northwest of the project site. Further, the Proposed Project would be similar in scale to the former Furama hotel. Figure IV.B-9 shows cross sections of the Proposed Project.

The Proposed Project would be similar in scale to other higher density structures in the project area, including the four-story Park West apartments, located approximately 0.3 miles southeast of the project site fronting Lincoln Boulevard, and the aforementioned Playa del Oro development, to the east and currently under construction. Landscaping would include various trees and shrubs along the perimeter of the project site as well as throughout the inner courtyards and pool area for a total of approximately 35,159 square feet of landscaped areas. Impacts related to the change in the visual appearance and character of the project site would be less than significant, as viewed from adjacent streets and the areas surrounding the project site.

Views Through the Project Site

The Proposed Project would be between three and five stories in height. Therefore, the view lines through the project site would be greatly reduced. However, since no scenic resources are currently available in the vicinity of the project site and the existing surrounding development prevents views of any potential scenic resources in the distance through the project site, development of the Proposed Project would not affect scenic views. Thus, impacts associated with the blockage of views through the project site would be less than significant.

Source: Van Tilburg Banvard & Soderbergh, AIA., 2009.

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Environmental Planning and Research

Figure IV.B-7
Rendering of Rayford Drive Elevation

Source: Van Tilburg Banvard & Soderbergh, AIA., 2009.

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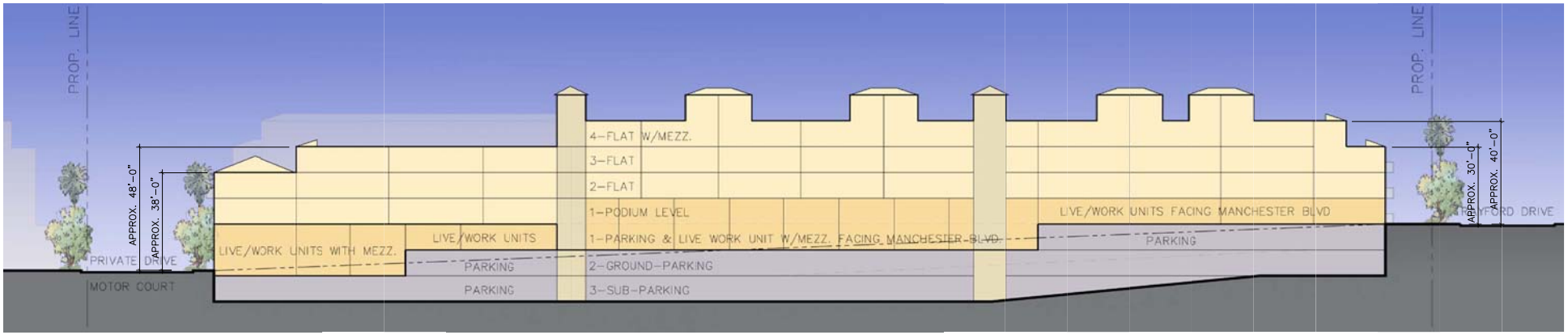
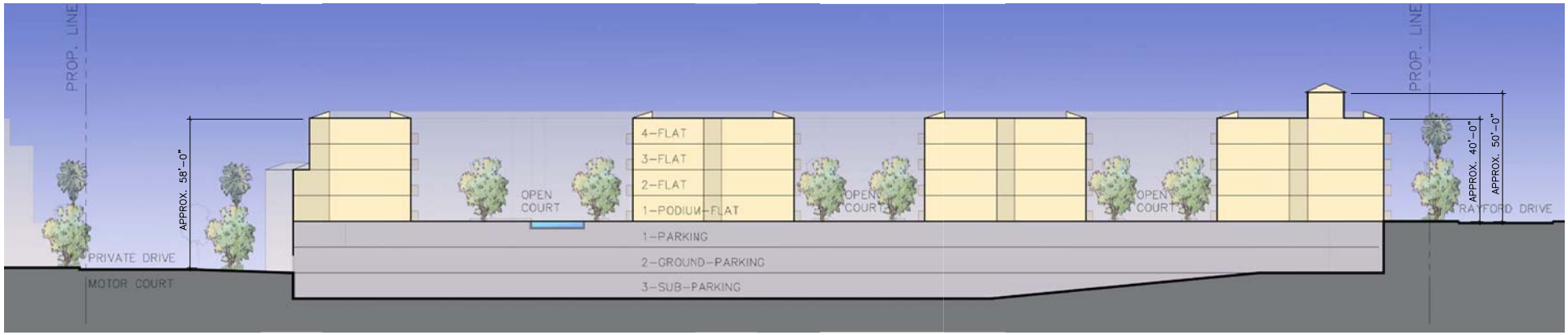
Figure IV.B-8
Rendering of Villanova Avenue Elevation



BUILDING SECTION - A



BUILDING SECTION - B

Source: Van Tilburg Banvard & Soderbergh, AIA. September 19, 2008

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Figure IV.B-9
Cross Sections of the Proposed Project

Light and Glare

Ambient lighting emanating from the existing uses on the project site contributes to the moderate to high ambient lighting levels in the surrounding area. The existing surface parking lot on the project site is a source of glare from sunlight reflecting off windshields. Nonetheless, as the Proposed Project would increase the amount of development on the project site, project implementation may incrementally increase the amount of nighttime lighting. This lighting would be derived from within the residential development as well as from security lighting on the ground floor, in the stairwells and access points, and in other common open space areas. Furthermore, the project site is located along Manchester Avenue, a Major Highway Class II, approximately 370 feet from Lincoln Boulevard, a major commercial corridor and State Highway with high ambient lighting levels. These roadways and others in the project area are lined with street lights that further contribute to the existing ambient lighting levels. As outlined in Mitigation Measures B-1 and B-2, all security and architectural lighting would be shielded, limiting the

Proposed Project's contribution to ambient lighting levels to an amount similar to what is currently experienced in the project vicinity. Additionally, any signage associated with the proposed live/work units on the ground floor would be compliant with LAMC § 12.11.5-B.4., which limits signage in the RAS4 zone to one exterior wall sign which is not internally illuminated[5], and § 14.4.4-E., which states that "no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property." Therefore, with implementation of the mitigation measures, the Proposed Project would not result in a substantial amount of light that would adversely affect day or nighttime views in the project vicinity, and impacts would be less than significant.

Development of the Proposed Project would include architectural features and façades that have a low level of reflectivity, including the use of design features such as non-reflective glass. Additionally, the Proposed Project would not include shiny surfaces, or metal or other reflective materials in the building façades and signage associated with the live/work uses on the ground floor. The Proposed Project would eliminate the existing source of glare from windshields of parked cars by moving all parking to the enclosed parking garage. Although the Proposed Project includes glass windows, which could result in some transitory conditions of glare during the day, with implementation of Mitigation Measure B-3, which requires the use of glass with low reflectivity or non-glare coating, the net potential for glare generation would be reduced to the maximum extent possible. As such, with implementation of the mitigation measures, impacts related to glare would be less than significant.

Signage Regulations and Policies

Any signage associated with the Proposed Project would be made up of project identity signs and address signs. All signage would be subject to review by the appropriate City entities and would incorporate specific design features intended to mitigate visual impacts, such as light and glare hazards to motorists. Additionally, as discussed, all signs would be compliant with LAMC §§ 12.11.5-B.4. and 14.4.4-E and,

[5] *LAMC § 12.11.5-B.4.*

as outlined in Mitigation Measure B-4, signs shall be limited to the maximum allowable under the LAMC.

Signage would also be required to comply with provisions set forth in the Loyola Village CDO. Guideline 16 of the CDO is intended to minimize sign clutter and ensure that signage design is suitable and well proportioned to the structure and building façade.[6] Signs associated with the Proposed Project would be limited to the size and placement outlined in Standards 16a through 16i under Guideline 16 of the CDO. In addition, the CDO contains two [Q] conditions pertaining to signage. Q-Condition 11a prohibits the use of billboards and electronic signs; while Q-Condition 11b limits the number of signs each business is permitted. No billboards or electronic signs would be included in the Proposed Project and the number of signs would be limited to the number permitted under the Q-Conditions of the CDO. Thus, the Proposed Project would be compliant with design guidelines set forth in the Loyola Village CDO. Therefore, with implementation of the mitigation measures, project impacts would be less than significant.

CUMULATIVE IMPACTS

Development of the Proposed Project in conjunction with the related projects, identified in Section III, Environmental Setting, would result in a mix of new development and redevelopment, or infilling, of residential, educational, industrial, and commercial land uses in the Westchester community. Only identified projects adjacent to or in close proximity to the Proposed Project would have the potential to contribute to a cumulatively considerable effect on aesthetics. Of the identified related projects, there is one related project located adjacent to the project site that may contribute a cumulatively considerable aesthetic impact, the Playa del Oro project (Related Project No. 1).

Development projects in proximity to the Proposed Project have the potential to contribute to blockage of scenic vistas and a substantial increase in the amount of light and glare in the area. The nearest related project to the Proposed Project is the adjacent Playa del Oro project to the east. However, as no views of particular aesthetic value exist through the project site, development of the Playa del Oro project would not contribute to the obstruction of any significant view. Therefore, development of the Proposed Project, in conjunction with the Playa del Oro project, is not anticipated to contribute to the blockage of a scenic view. Additionally, development of the Playa del Oro project would not be expected to substantially change the overall ambient light levels or create an extensive source of potential new glare. Any additional glare from the related projects would be subject to the City's reflective materials design standards, which limits the amount of reflective surface areas and materials that can be used for a given project. The potential light and glare created from this related project would not be cumulatively considerable.

Development of the remaining related projects throughout the Westchester community, in conjunction with the Proposed Project, would result in a substantial change to the visual environment. However, the most common scenic resources of value are trees and historic structures, both of which are protected by

[6] *Loyola Village Community Design Overlay District, Guideline 16, July 2009.*

City policies and regulations. As no substantial scenic resources are located in the area surrounding the project site, development of the related projects in conjunction with the Proposed Project would not result in a cumulatively considerable reduction in scenic resources. Furthermore, the development of the related projects is expected to be consistent with the height, mass, and visual character of the existing urban Westchester community. Therefore, the Proposed Project in conjunction with the related projects would not result in a significant impact related to the aesthetic and visual character of the area.

MITIGATION MEASURES

B-1 Project lighting, including security lighting, shall be directed onto the project site, and all lighting shall be shielded from adjacent roadways and off-site properties.

B-2 Atmospheric light pollution shall be minimized by utilizing lighting fixtures that cut-off light directed to the sky.

B-3 All glass to be incorporated into the exterior of the building shall be either of low-reflectivity, or accompanied by a non-glare coating.

B-4 On-site signs shall be limited to the maximum allowable under the LAMC.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the mitigation measures, impacts of the Proposed Project on views of and through the project site and impacts related to light and glare would be less than significant.

ENVIRONMENTAL SETTING

The issue of shade and shadow pertains to the blockage of direct sunlight by on-site buildings, which affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational, churches, schools, outdoor restaurants, and pedestrian areas have expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive." The area around the project site was surveyed for shadow-sensitive uses. The shadow sensitive uses identified are described below.

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 the rotation of the earth (i.e., time of day) and its 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.

Summer and Winter Solstice

"Solstice" is defined as either of the two points on the ecliptic that lie midway between the equinoxes (separated from them by an angular distance of 90 degrees). At the solstices, the sun's apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23.5 degrees of the arc. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the northern hemisphere, the longest day and shortest night of the year occur on this date, making the beginning of summer. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. Measuring the shadow lengths for the winter and summer solstices represents the extreme shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year. Shadows are shown for summer solstice, cast from 9:00 A.M. to 5:00 P.M., and for winter solstice, cast from 9:00 A.M. to 3:00 P.M. Project-generated shadows and figures depicting these shadows are discussed and shown under the "Project Impacts" subheading below (see Figures IV.B-10 and IV.B-11).

Existing Shadow Patterns

The existing on-site structures are one story tall and do not extend shadows beyond the surrounding roadways.

Shadow-Sensitive Land Uses

According to the *L.A. CEQA Thresholds Guide*, facilities and operations that are sensitive to the effect of shading generally include, but are not limited to: routinely useable outdoor spaces associated with

residential or institutional land uses, commercial uses, such as pedestrian-oriented outdoor areas or restaurants with outdoor eating areas; nurseries; existing solar collectors; and recreational areas, such as parks. A survey of the project area revealed that shadow-sensitive land uses in the vicinity of the project site include the multi-family residential and church uses to the northwest, north, and northeast, the single-family residential and school uses to the south and southeast, and the single-family residential and church uses to the west.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G of the *State CEQA Guidelines* does not provide specific thresholds of significance for shade and shadow impacts.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

(a) A project impact would normally be considered significant shadow-sensitive uses would be shaded by project-related structure for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (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. Pacific Daylight Time (between April and late October).

Project Impacts

Shade and Shadow

Winter Solstice

The Proposed Project would achieve heights from 30’ 0” to 58’ 0”. As shown in Figure IV.B-10, the Proposed Project’s maximum height would be tall enough to result in winter solstice shadows extending beyond the surrounding roadways. At 9:00 A.M., shadows would be cast northward upon Manchester Avenue, fronting yards of the multi-family residential uses. Additional shadows would be cast westward upon Rayford Drive, fronting the landscaped yard and surface parking area of the church. Shadows would be cast onto small portions of the landscaped areas of the multi-family residential uses to the north, across Manchester Avenue, and the church to the west, across Rayford Drive. However, shading resulting from the Proposed Project would be cast upon these properties to the north and west for less than the three-hour threshold. By noon, the shadows from the proposed development would no longer be cast upon the described shadow-sensitive uses. The Proposed Project would cast shadows directly north and onto Manchester Avenue. By 3:00 P.M., the Proposed Project would cast shadows towards the northeast and once again upon Manchester Avenue and the yards fronting the multi-family residential uses. These 3:00 P.M. shadows would also be cast onto the Siam Restaurant. Therefore, winter shadows cast by the Proposed Project would not be cast onto nearby shadow-sensitive uses in excess of the three-hour threshold during the course of one day. As such, no significant winter shadow impact from the Proposed Project would occur.

Source: Google Earth Pro, 2008.

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Figure IV.B-10
Winter Solstice Shadows
December 21st

Summer Solstice

As discussed above, shadows cast during the summer solstice are shorter than at any other time of the year. As such, shadows cast by future structures developed on the project site would be shorter during the summer solstice than during the winter solstice. As shown in Figure IV.B-11, shadows cast during the summer solstice would be cast in the same general directions as on the winter solstice but would not extend as far out. At 9:00 A.M., shadows would be cast directly westward upon the proposed on-site driveways and onto Rayford Drive. Additional shadows would be cast westward upon Rayford Drive, fronting the landscaped yard and surface parking areas of the church. These shadows would not extend onto any portion of the church to the west. By 1:00 P.M., the shadows from the proposed development would no longer be cast westward but would be cast towards the north and would not extend off the project site. By 5:00 P.M., the Proposed Project would cast shadows eastward and upon the western façade of the adjacent Play del Oro development. As these shadows would be cast onto the Playa del Oro development after 1:00 P.M., the development would be shaded for less than the threshold four hours. Development of the Proposed Project would result in shadows only being cast upon the adjacent Playa del Oro project at 5:00 P.M. and later, which would not impact nearby sensitive uses. Therefore, impacts would be less than significant.

CUMULATIVE IMPACTS

A cumulative shading impact may occur if a related project was in construction adjacent to or near the Proposed Project and resulted in a shadow overlap such that the new combined shadow would be cast upon shadow-sensitive uses in excess of the three-hour threshold. The only related project which could have the potential to create a cumulative shading impact is the Playa del Oro mixed-use development (Related Project No. 1) located directly adjacent and east of the project site. Because this related project would achieve roughly the same height as the Proposed Project, it can be assumed that shadow lengths would be similar to the Proposed Project. At 9:00 A.M., the shadows would similarly be cast to the northwest and only abut, not shade, the nearby multi-family residential uses. The remainder of the uses located north of the Playa del Oro project are commercial in nature. As such, the shadows cast to the north would not cast upon shadow-sensitive uses. Therefore, no cumulatively considerable shading impacts would occur.

MITIGATION MEASURES

There are no mitigation measures required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to the shading of shadow-sensitive uses as a result of the buildout of the Proposed Project would be less than significant.

Source: Google Earth Pro, 2008.

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Figure IV.B-11
Summer Solstice Shadows
June 21st

IV. ENVIRONMENTAL IMPACT ANALYSIS
C. AIR QUALITY

INTRODUCTION

This section examines the degree to which the Proposed Project may result in significant adverse changes to air quality. Both short-term construction emissions occurring from activities such as site grading and haul truck trips, as well as long-term effects related to the ongoing operation of the Proposed Project are discussed in this section. The analysis contained herein focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. "Emissions" refer to the actual quantity of pollutant measured in pounds per day (ppd). "Concentrations" refer to the amount of pollutant material per volumetric unit of air and are measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

The potential for the Proposed Project to conflict with or obstruct implementation of the applicable air quality plan, to violate an air quality standard or contribute substantially to an existing or projected air quality violation, to result in a cumulatively considerable net increase of greenhouse gases or any criteria pollutant for which the project region is non-attainment, to expose sensitive receptors to substantial pollutant concentrations, or to create objectionable odors affecting a substantial number of people are also discussed. Documents used in the preparation of this section include the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook and the 2007 Air Quality Management Plan (AQMP), as amended, as well as federal and State regulations and guidelines.

ENVIRONMENTAL SETTING

The project site is located within the South Coast Air Basin (Basin), named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys below. This Basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The regional climate within the Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is primarily influenced by a wide range of emissions sources – such as dense population centers, heavy vehicular traffic, and industry – and meteorology.

Air Pollutants

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples are boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products such as barbeque lighter fluid and hair spray. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may

be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, racecars, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Both the federal and State governments have established ambient air quality standards for outdoor concentrations of various pollutants in order to protect public health and welfare. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, that have been adopted for them. The national and State standards have been set at levels considered safe to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

The criteria air pollutants which are most relevant to current air quality planning and regulation in the Basin include ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. In addition, toxic air contaminants (TACs) and greenhouse gas (GHG) emissions are of a concern in the Basin. The characteristics of each of these pollutants are briefly described below.

- *Ozone (O_3)* is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs) and nitrogen oxides (NO_x), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

- *Carbon Monoxide (CO)* is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

- *Respirable Particulate Matter (PM_{10})* and *Fine Particulate Matter ($PM_{2.5}$)* consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

- *Nitrogen dioxide (NO_2)* is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of nitrogen oxide compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic

density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitors.

- *Sulfur dioxide (SO_2)* is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When sulfur dioxide oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

- *Lead (Pb)* occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles such as race cars. However, because it was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, lead is present in many urban soils and can get re-suspended in the air. Other sources of lead include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary lead smelters.

- *Toxic Air Contaminants (TAC)* refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. They include both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. Toxic air contaminants are different than "criteria" pollutants in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxics and their effects on health tend to be felt on a local scale rather than on a regional basis.

- *Greenhouse Gas (GHG)* emissions refer to a group of emissions that are believed to affect global climate conditions. Simply put, the greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass allows solar radiation (sunlight) into the Earth's atmosphere, but prevents radiative heat from escaping, thus warming the Earth's atmosphere. Greenhouse gases such as carbon dioxide (CO_2), methane, and nitrous oxide keep the average surface temperature of the Earth close to a hospitable 60 degrees Fahrenheit. However, excessive concentrations of GHGs in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences. Global climate change attributable to anthropogenic (human) emissions of GHGs is one of the most important and widely debated scientific, economic, and political issues in the United States.

  GHGs include carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Carbon dioxide is the most abundant GHG. Other GHGs are less abundant, but have higher global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. GHGs are the result of human activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power

generation, transportation, heating, and cooking are the primary sources of GHG emissions. According to the California Energy Commission (CEC), emissions from fossil fuel consumption represent approximately 81 percent of all GHG emissions and transportation creates 41 percent of all GHG emissions in the United States.[1] A general description of the GHGs discussed is provided in Table IV.C-1, Description of Identified Greenhouse Gases.

Health Effects of Criteria Air Pollutants

The health effects of the criteria pollutants (i.e., ozone, carbon monoxide, fine suspended particulate matter, nitrogen dioxide, sulfur dioxide, and lead) and TACs are described below.[2] In addition, a list of the harmful effects of each criteria pollutant is provided in Table IV.C-2, Summary of Health Effects of Criteria Pollutants.

Ozone

Individuals exercising outdoors, children, and people with a preexisting lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible sub-groups for ozone effects. Short-term exposures (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated ozone levels are associated with increased school absences. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high ozone communities.

Ozone exposure under exercising conditions is known to increase the severity of the above mentioned observed responses. Animal studies suggest that exposures to a combination of pollutants that include ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

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[1] *California Energy Commission, Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, Staff Final Report, December 2006.*

[2] *The descriptions of the health effects of the criteria pollutants are taken from Appendix C (Health Effects of Ambient Air Pollutants) of SCAQMD's "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" document.*

Table IV.C-1
Description of Identified Greenhouse Gases

Greenhouse Gas	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of carbon dioxide are from burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and is the main component of natural gas. When one molecule of methane is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. There are no ill health effects from methane. A natural source of methane is from the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	HFCs are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (CFCs) for automobile air conditioners and refrigerants. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, their production was stopped as required by the Montreal Protocol in 1987.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down though the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above the earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Source: Association of Environment Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007.

Table IV.C-2
Summary of Health Effects of Criteria Pollutants

Pollutants	Primary Health and Welfare Effects
Ozone (O_3)	• Aggravation of respiratory and cardiovascular diseases • Reduced lung function • Increased cough and chest discomfort
Carbon Monoxide (CO)	• Aggravation of some heart disease (angina) • Reduced tolerance for exercise • Impairment of mental function • Impairment of fetal development • Death at high levels of exposure
Fine Particulate Matter (PM_{10} and $PM_{2.5}$)	• Reduced lung function • Aggravation of respiratory and cardio-respiratory diseases • Increases in mortality rate • Reduced lung function growth in children
Nitrogen Dioxide (NO_2)	• Aggravation of respiratory illness
Sulfur Dioxide (SO_2)	• Aggravation of respiratory diseases (asthma, emphysema) • Reduced lung function
Lead (Pb)	• Behavioral and hearing disabilities in children • Nervous system impairment

Source: SCAQMD, Guidance Document for Air Quality Issues in General Plans and Local Planning, 2005.

Carbon Monoxide (CO)

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Reduction in birth weight and impaired neurobehavioral development has been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include pre-term births and heart abnormalities. Additional research is needed to confirm these results.

Particulate Matter (PM_{10} & $PM_{2.5}$)

A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air

pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer.

Daily fluctuations in fine particulate matter concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter.

The elderly, people with pre-existing respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of PM_{10} and $PM_{2.5}$.

Nitrogen Dioxide (NO_2)

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2 in healthy individuals. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

In animals, exposure to levels of NO_2 considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of O_3 and NO_2.

Sulfur Dioxide (SO_2)

A few minutes of exposure to low levels of SO_2 can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO_2.

Animal studies suggest that despite SO_2 being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO_2 levels. In these studies, efforts to separate the effects of SO_2 from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Sulfates (SO_4)

Most of the health effects associated with fine particles and SO_2 at ambient levels are also associated with SO_4. Thus, both mortality and morbidity effects have been observed with an increase in ambient SO_4 concentrations. However, efforts to separate the effects of SO_4 from the effects of other pollutants have generally not been successful.

Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure. Animal studies suggest that acidic particles such as sulfuric acid aerosol and ammonium bisulfate are more toxic than non-acidic particles like ammonium sulfate. Whether the effects are attributable to acidity or to particles remains unresolved.

Lead (Pb)

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence levels. In adults, increased lead levels are associated with increased blood pressure.

Lead poisoning can cause anemia, lethargy, seizures and death. It appears that there are no direct effects of lead on the respiratory system. Lead can be stored in the bone from early-age environmental exposure, and elevated blood lead levels can occur due to the breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland), and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of lead because of previous environmental lead exposure of their mothers.

Toxic Air Contaminants (TACs)

Toxic Air Contaminants (TACs) are a broad class of compounds known to cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. As discussed previously, effects from TACs may be both chronic and acute on human health. Acute health effects are attributable to sudden exposure to high quantities of air toxics. These effects include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects result from low-dose, long-term exposure from routine releases of air toxics. The effect of major concern for this type of exposure is cancer, which requires a period of 10-30 years after exposure to develop.

TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs (based on the statewide average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals

in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the ARB, and are listed as carcinogens either under the State's Proposition 65 or under the federal Hazardous Air Pollutants programs. California has adopted a comprehensive diesel risk reduction program. The United States Environmental Protection Agency (U.S. EPA) has adopted low sulfur diesel fuel standards that will reduce diesel particulate matter substantially. These went into effect in June 2006.

Existing Regional Air Quality

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The Basin has low mixing heights and light winds, which help to accumulate air pollutants. The most current average daily emissions inventory for the entire Basin and the Los Angeles County portion of the Basin is summarized in Table IV.C-3, 2006 Estimated Average Daily Regional Emissions.[3] As shown, exhaust emissions from mobile sources generate the majority of VOC, CO, NO_x, and SO_x in the Basin and the Los Angeles County portion of the Basin. Area-wide sources generate the most airborne particulates (i.e., PM_{10} and $PM_{2.5}$) in both the Basin and Los Angeles County.

Measurements of ambient concentrations of the criteria pollutants are used by U.S. EPA and the ARB to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and State standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in "attainment." If the pollutant exceeds the standard, the area is classified as a "non-attainment" area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated "unclassified."

Table IV.C-3
2006 Estimated Average Daily Regional Emissions

Emissions Source	Emissions in Tons per Day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
South Coast Air Basin						
Stationary (Point) Sources	101.9	58.3	55.4	19.3	20.9	13.7
Area-wide Sources	148.3	25.6	110.3	0.8	210.3	51.2
Mobile Sources	425.8	866.5	3,580.0	28.1	48.4	39.0
Natural (non-anthropogenic) Sources	86.5	5.0	164.2	1.5	16.6	14.1
Total Emissions	762.5	955.4	3,909.9	49.7	296.2	118.0
Los Angeles County						
Stationary (Point) Sources	65.16	42.41	37.50	18.00	14.44	10.22
Area-wide Sources	90.39	15.87	50.50	0.41	134.12	30.29
Mobile Sources	264.45	587.17	2,212.77	35.00	32.93	27.12
Natural (non-anthropogenic) Sources	40.55	1.94	64.99	0.6	6.56	5.56
Total Emissions	460.55	647.39	2,365.76	54.01	188.05	73.19

Source: California Air Resources Board, June 2007.

[3] *The estimated annual average emissions for 2006 are the most recent data provided by the ARB.*

The U.S. EPA and the ARB use different standards for determining whether the Basin is in attainment. Federal and State standards are summarized in Table IV.C-4, Ambient Air Quality Standards. The attainment status for the Los Angeles County portion of the Basin with regard to the national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS) is shown in Table IV.C-5, Attainment Status for the South Coast Air Basin (Los Angeles County Portion).

Table IV.C-4
Ambient Air Quality Standards

Air Pollutant	Averaging Time	State Standard	Federal Standard
Ozone	1 Hour	0.09 ppm	--
	8 Hour	0.07 ppm	0.075 ppm
Carbon Monoxide	1 Hour	20.0 ppm	35.0 ppm
	8 Hour	9.0 ppm	9.0 ppm
Nitrogen Dioxide	1 Hour	0.18 ppm	--
Sulfur Dioxide	1 Hour	0.25 ppm	--
	24 Hour	0.04 ppm	0.14 ppm
PM_{10}	24 Hour	50 $\mu g/m^3$	150 $\mu g/m^3$
$PM_{2.5}$	24 Hour	--	35 $\mu g/m^3$

Note: The lead standard is not listed because of the phase-out of leaded gasoline.
Source: California Air Resources Board, Ambient Air Quality Standards, website: http://www.arb.ca.gov/research/aaqs/aaqs2.pdf, November 2, 2007.

Table IV.C-5
Attainment Status for the South Coast Air Basin (Los Angeles County Portion)

Pollutant	Attainment Status	
	NAAQS	CAAQS
Carbon Monoxide	Attainment	Attainment
Nitrogen Dioxide	Attainment	Attainment
Ozone	Extreme Non-attainment	Non-attainment
PM_{10}	Serious Non-Attainment	Non-attainment
$PM_{2.5}$	Non-Attainment	Non-attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment

Source: California Air Resources Board: State Area Designation Maps found at http://www.arb.ca.gov/desig/adm, May 2008.

Existing Local Air Quality

The SCAQMD divides the Basin into 38 source receptor areas (SRAs) in which 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. The project site is located within the City of Los Angeles and is located within SRA 3, which covers the Southwest Coastal Los

Angeles County area.[4] Currently, SCAQMD Station No. 820 collects ambient air quality data for SRA 3. This station currently monitors emission levels of ozone, CO, NO_2, SO_2, and PM_{10}. Table IV.C-6, Summary of Ambient Air Quality in the Proposed Project Vicinity, identifies the national and State ambient air quality standards for the relevant air pollutants, along with the ambient pollutant concentrations that were measured at the SCAQMD Station No. 820 between 2005 and 2007.[5]

According to the air quality data from the SCAQMD Station No. 820, shown in Table IV.C-6, both the national and State 1-hour ozone standards were not exceeded from 2005 to 2007. The national 8-hour ozone standard was not exceeded from 2005 to 2007, while the State 8-hour ozone standard was exceeded a total of 2 days from 2005 to 2007. The national 24-hour PM_{10} standard has not been exceeded from 2005 to 2007, while the State 24-hour PM_{10} standard was exceeded a total of 2 days from 2005 to 2007. In addition, no national or State standards for CO, NO_2, or SO_2 have been exceeded from 2005 to 2007.

Table IV.C-6
Summary of Ambient Air Quality in the Project Vicinity

Air Pollutants Monitored Within SRA 3 — Southwest Coastal Los Angeles County Area	Year		
	2005	2006	2007
Ozone			
Maximum 1-hour concentration measured	0.086 ppm	0.08 ppm	0.087 ppm
Days exceeding national 0.12 ppm 1-hour standard	0	0	0
Days exceeding State 0.09 ppm 1-hour standard	0	0	0
Maximum 8-hour concentration	0.076 ppm	0.066 ppm	0.074 ppm
Days exceeding national 0.08 ppm 8-hour standard [a]	0	0	0
Days exceeding State 0.07 ppm 8-hour standard	1	0	1
Respirable Particulate Matter (PM_{10})			
Maximum 24-hour concentration measured	44.0 $\mu g/m^3$	45.0 $\mu g/m^3$	96.0 $\mu g/m^3$
Days exceeding national 150 $\mu g/m^3$ 24-hour standard	0	0	0
Days exceeding State 50 $\mu g/m^3$ 24-hour standard	0	0	2
Carbon Monoxide (CO)			
Maximum 1-hour concentration measured	3.0 ppm	3.0 ppm	3.0 ppm
Days exceeding national 35.0 ppm .1-hour standard	0	0	0
Days exceeding State 20.0 ppm 1-hour standard	0	0	0
Maximum 8-hour concentration measured	2.1 ppm	2.3 ppm	2.4 ppm
Days exceeding national & State 9.0 ppm 8-hour standard	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour concentration measured	0.09 ppm	0.10 ppm	0.08 ppm
Days exceeding State 0.25 ppm 1-hour standard	0	0	0
Annual Arithmetic Mean (AAM)	0.0134 ppm	0.0155 ppm	0.0140 ppm
Does measured AAM exceed national 0.0534 ppm AAM standard?	No	No	No
Sulfur Dioxide (SO_2)			
Maximum 24-hour concentration measured	0.012 ppm	0.006 ppm	0.009 ppm
Number of days exceeding national 0.14 ppm 24-hour standard	0	0	0
Number of days exceeding state 0.04 ppm 24-hour standard	0	0	0

[4] *SCAQMD, website: http://www.aqmd.gov/telemweb/areamap.asp, July 1, 2008.*

[5] *The most current air quality data available pertaining to ambient pollutant concentrations over a three-year period provided by the SCAQMD is from 2005 to 2007.*

Table IV.C-6
Summary of Ambient Air Quality in the Project Vicinity

Air Pollutants Monitored Within SRA 3 — Southwest Coastal Los Angeles County Area	Year		
	2005	2006	2007

Note: ppm = parts per million by volume
$\mu g/m^3$ = micrograms per cubic meter
[a] *The U.S. EPA has revised the national 8-hour ozone standard from 0.08 ppm to 0.075 ppm, effective May 27, 2008.*
Source: South Coast Air Quality Management District, 2004, 2005, 2006.

Existing Air Pollutant Emissions in Local Vicinity

Air pollutant emissions are generated in the local vicinity of the project site by stationary and area-wide sources, such as space and water heating, landscape maintenance from leaf blowers and lawn mowers, consumer products, and mobile sources, primarily automobile traffic. None of the existing uses surrounding the project site involve industrial or manufacturing processes that would result in the release of toxic air emissions. Overall, motor vehicles are the primary source of pollutants in the project site vicinity.

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed CO "hotspots." The SCAQMD considers CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots. The SCAQMD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, hospitals, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive receptors to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The SCAQMD recommends the use of CALINE4, a dispersion model for predicting CO concentrations, as the preferred method of estimating localized pollutant concentrations at sensitive receptors near congested roadways and intersections. For each intersection analyzed, CALINE4 adds roadway-specific CO emissions calculated from peak-hour turning volumes 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 and accepted by the SCAQMD. The simplified procedure is intended as a screening analysis, which identifies a potential CO hotspot. This methodology assumes worst-case conditions and provides a screening of maximum, worst-case CO concentrations. The emission factors used in the analysis have been updated to EMFAC2007.

Maximum 1-hour and 8-hour CO concentrations were calculated for the seven study intersections evaluated in the traffic report for the Proposed Project, which may have sensitive receptors in close

proximity to the roadways. The results of these calculations are presented in Table IV.C-7, Existing (2008) Localized Carbon Monoxide Concentrations, for representative receptors located at each roadway edge as well as at 25, 50, and 100 feet from each roadway. The distances of 25, 50, and 100 feet from each roadway were selected because they represent locations where a person may be living or working for more than eight hours at a time. 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. The 8-hour national and State standards for localized CO concentrations are 9.0 ppm.

As shown in Table IV.C-7, none of the study intersections are currently exceeding the national and State 1-hour and 8-hour CO standards. Therefore, CO hotspots do not exist near these intersections.

Table IV.C-7
Existing (2008) Localized Carbon Monoxide Concentrations

Intersection	CO Concentrations in Parts per Million [a]							
	Roadway Edge		25 feet		50 feet		100 feet	
	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour
83rd Street and Lincoln Boulevard	6.4	4.8	5.2	4.0	4.8	3.7	4.3	3.3
83rd Street and Rayford Drive	3.8	2.9	3.4	2.7	3.3	2.6	3.2	2.6
Manchester Avenue and Pershing Drive	4.2	3.2	3.7	2.9	3.6	2.8	3.4	2.7
Manchester Avenue and Rayford Drive	3.5	2.8	3.3	2.6	3.3	2.6	3.2	2.5
Manchester Avenue and Lincoln Boulevard	6.0	4.5	5.0	3.8	4.6	3.5	4.2	3.2
Manchester Avenue and Loyola Boulevard	3.9	3.0	3.6	2.8	3.5	2.7	3.3	2.6
Loyola Boulevard and Lincoln Boulevard	5.7	4.3	4.8	3.6	4.4	3.4	4.0	3.1

[a] *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.*

Traffic Information Source: Crain & Associates, September 2008.
Source: Christopher A Joseph and Associates, 2008. Calculation data and results are provided in Appendix D.

Existing Site Emissions

The western portion of the project site is currently developed with three existing structures which contain eight separate commercial uses, including: two real estate offices; a health food store/acupuncture office; a pilates/yoga studio; a gift shop; a karate/martial arts studio; an automotive service center; and an art supply store. Air pollutant emissions are generated at the project site by stationary and area-wide sources, such as space and water heating, landscape maintenance equipment, architectural coatings (painting), and mobile vehicle traffic traveling to and from the site. The average daily emissions generated by the existing uses at the project have been calculated utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. The results of these calculations are shown in Table IV.C-8, Existing (2008) Daily Operational Emissions at Project Site. Currently, the operational emissions of VOC, NO_x,

Table IV.C-8
Existing (2008) Daily Operational Emissions at Project Site

Emissions Source	Emissions in Pounds per Day					
	VOC	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Water and Space Heating	0.02	0.23	0.19	0.00	0.00	0.00
Landscape	0.14	0.02	1.66	0.00	0.00	0.00
Architectural Coating	0.14	-	-	-	-	-
Motor Vehicles	8.84	9.34	111.70	0.09	15.56	2.96
Total Emissions	***9.14***	***9.59***	***113.55***	***0.09***	***15.56***	***2.96***
Wintertime (Non-Smog Season) Emissions						
Water and Space Heating	0.02	0.23	0.19	0.00	0.00	0.00
Architectural Coating	0.14	-	-	-	-	-
Motor Vehicles	10.09	11.53	108.84	0.07	15.56	2.96
Total Emissions	***10.25***	***11.76***	***109.03***	***0.07***	***15.56***	***2.96***

Source: Christopher A. Joseph & Associates, 2008. Computer sheets are provided in Appendix D.

CO, SO_x, PM_{10}, and $PM_{2.5}$ at the project site do not exceed the SCAQMD thresholds for operational emissions associated with these pollutants. As shown in Table IV.C-8, motor vehicles are the primary source of air pollutant emissions associated with the project site.

In addition, the GHG emissions resulting from the consumption of natural gas and electricity, as well as the consumption of fuel by motor vehicles traveling to and from the project site, by the existing uses at the project site are shown in Table IV.C-9, Existing (2008) Operational Greenhouse Gas Emissions.

Table IV.C-9
Existing (2008) Operational Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions in Metric Tons per Year
Natural Gas Consumption	45.10
Electricity Generation	118.68
Motor Vehicles	1,369.32
Total	***1,533.10***

Source: Christopher A. Joseph & Associates, 2008. Calculation data and results are provided in Appendix D.

Existing State-wide Greenhouse Gas Emissions

The CEC published the *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004* in December 2006. This report indicates that California emitted between 425 and 468 million metric tons of greenhouse gases in 1990. This is largely a result of California's large population. When considering fossil fuel emissions at the level of each individual person, California is second lowest in the nation in per capita CO_2 emissions, with only the District of Columbia being lower. Between 1990 and 2000, California's population grew by 4.1 million people and during the 1990 to 2003 period, California's gross

state product grew by 83 percent (in dollars, not adjusted for inflation). However, California's greenhouse gas emissions grew by only 12 percent between 1990 and 2003. The report concludes that California's ability to slow the rate of growth of greenhouse gas emissions is largely due to the success of its energy efficiency, renewable energy programs, and commitment to clean air and clean energy. In fact, the State's programs and commitments lowered its greenhouse gas emissions rate of growth by more than half of what it would have been otherwise.

Regulatory Framework

Air quality in the United States is governed by the Federal Clean Air Act (CAA). In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). At the federal level, the CAA is administered by the U.S. EPA. In California, the CCAA is administered by the ARB at the State level and by the AQMD at the regional and local levels.

Air quality within the Basin is addressed through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the Basin are discussed below.

Federal

U.S. EPA

The U.S. EPA is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The U.S. EPA also has jurisdiction over emissions sources outside state waters (outer continental shelf), and establishes various emissions standards for vehicles sold in states other than California.

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP.

State

ARB

The ARB, a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, the ARB conducts research, sets California Ambient Air Quality Standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. The ARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair

spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

California Global Warming Solutions Act

In August 2006, the California Legislature adopted AB 32, the California Global Warming Solutions Act of 2006. This bill requires the ARB to adopt regulations to require the reporting and verification of statewide greenhouse gas emissions and to monitor and enforce compliance with that program. As part of this effort, the ARB will adopt a statewide greenhouse gas emissions limit equivalent to the statewide greenhouse gas emissions levels in 1990, to be achieved by 2020. The ARB will adopt rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emission reductions. These are expected to include market-based compliance mechanisms. The statute would further require the ARB to monitor compliance with and enforce any rule, regulation, order, emission limitation, emissions reduction measure, or market-based compliance mechanism that it adopts. In October 2006, the Governor issued an Executive Order in which he designated the Cal/EPA Secretary with the primary responsibility for implementing AB 32 (rather than providing the ARB with unfettered discretion as the law required). In late December, the Governor announced the members of a blue-ribbon Market Advisory Committee board to devise approaches to develop a market for carbon trading. More developments are likely as the Governor and the Legislature determine who has primary responsibility for implementation and the relationship between regulations and market-based mechanisms. Because, the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, and the present year (2009) is beyond the midpoint of this timeframe, it is expected that the regulations would affect many existing sources of greenhouse and not just new general development projects.

In response to the Executive Order, the Secretary of Cal/EPA created the Climate Action Team (CAT), which, in March 2006, published the *Climate Action Team Report to Governor Schwarzenegger and the Legislature* (the "2006 CAT Report"). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change greenhouse gas emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.

As a central requirement of AB 32, the ARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 greenhouse gas emissions limit. This Scoping Plan, which was developed by the ARB in coordination with the CAT, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall greenhouse gas emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs, implementation of California's clean cars standards, increases in the amount of clean and renewable energy used to power the State, and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan also proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in

California ports. The Proposed Scoping Plan was approved by the ARB on December 11, 2008. The measures in the Scoping Plan would be developed over the next two years and be in place by 2012. As required by AB 32, the ARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

Our understanding of the fundamental processes responsible for global climate change has improved over the past decade, and our predictive capabilities are advancing. However, significant scientific uncertainties remain in, for example, predictions of local effects of climate change, occurrence of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth climate system, the uncertainty in its description and in the prediction of changes may never be completely eliminated. Due to these uncertainties, there continues to be significant debate over the extent to which increased concentrations of greenhouse gases have caused or will cause climate change, and over the appropriate actions to limit and/or respond to climate change.

Currently, AB 32 does not provide significance thresholds or methodology for analyzing a project's impacts regarding the production of greenhouse gases. Further, neither the ARB nor the SCAQMD have issued any guidance to counties, cities, or other agencies for the implementation of AB 32 through the CEQA process or for the evaluation and/or analysis of greenhouse gas emissions in environmental documents. In June 2008, the Governor's Office of Planning and Research (OPR) released a technical advisory entitled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review* (the "OPR Climate Change Report"), which provides lead agencies an approach to comply with CEQA climate change analysis for projects that generate GHG emissions. However, no significance thresholds for analyzing a project's impacts regarding the production of greenhouse gases has been provided in the OPR technical advisory document.

Off-Road Diesel Engines

Off-road diesel vehicles, which include construction equipment, are also regulated by the ARB for both in-use (existing) and new engines. There have been four sets of standards, known as Tiers, implemented by the ARB for new off-road diesel engines. Tier 1 standards began in 1996. Tier 2 and 3 were adopted in 2000 and were more stringent than the first tier. Tier 2 and 3 standards were completely phased in by 2006 and 2008, respectively. On December 9, 2004, the ARB adopted the Tier 4 or fourth phase of emission standards for late model year engines. These emission standards are nearly identical to those finalized by the U.S. EPA in May 2004. These standards will decrease PM and NO_X emissions 90 percent below current levels beginning in 2011.

Since most off-road vehicles today have no emission controls and can last 30 years or longer, the ARB approved, on July 26, 2007, a regulation to reduce emission from existing (in-use) off-road diesel vehicles used in construction and other industries. It was approved by the California Office of Administrative Law (OAL) on May 16, 2008 and it became effective on June 15, 2008. This regulation includes an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and up. This regulation also establishes emission rates targets that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. The regulation will take effect on the larger fleets first with

average compliance dates in 2010 while medium and small fleet requirements will achieve compliance in 2013 and 2015, respectively. This regulation also includes the Surplus Off-Road Opt-in for NO_x (SOON) program. The local air districts may opt into the SOON program to reduce NO_x emissions beyond what is required by the regulation. Staff at the SCAQMD proposed Rule 2449, which would implement the SOON program. This rule was adopted at the May 2, 2008 board meeting. Opting into this program is anticipated to achieve a 12 ton per day reduction in NO_x by 2014 in the Basin.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a council of governments for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment.

Although the SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan and Guide (RCPG) provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RCPG is a framework for decision-making for local governments, assisting them in meeting federal and State mandates for growth management, mobility, and environmental standards, while maintaining consistency with regional goals regarding growth and changes through the year 2015, and beyond. Policies within the RCPG include consideration of air quality, land use, transportation, and economic relationships by all levels of government.

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, and local governments, and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and provides regulatory enforcement through such measures as educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of the SCAQMD on June 1, 2007. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2007 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has

occurred within the Basin. As discussed on page 2-6 of the 2007 AQMP, levels of ambient pollutants monitored in the Basin have decreased substantially since 1985.

The future air quality levels projected in the 2007 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by SCAG in its most current version of the RCPG, which was adopted in March 1996. The 2007 AQMP also assumes that general development projects will include feasible strategies (i.e., mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations which are designed to address air quality impacts and pollution control measures.

The 2007 AQMP incorporates new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling. General development projects would be affected in the form of any applicable rules and regulations – if any – that are adopted as a result of the 2007 AQMP. The recommended control measures and the recommended State and federal control measures that promote fuel efficiency and pollution prevention in the 2007 AQMP is expected to reduce GHG emissions. In general, the strategies that conserve energy and promote clean technologies usually also reduce GHG emissions.

Although the SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with plans and new development projects within the Basin. Instead, the SCAQMD has prepared the *CEQA Air Quality Handbook* to assist Lead Agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the Basin.

Local

City of Los Angeles

Local jurisdictions, such as the City of Los Angeles, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City of Los Angeles is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals.

The Air Quality Element of the City of Los Angeles General Plan was adopted on November 24, 1992 and sets forth the goals, objectives and policies which will guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges that numerous efforts are underway at the regional, county and city levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area's residents are crucial to the achievement of state and federal air quality standards.

The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and clean air goals. Mutually reinforcing strategies need to be developed

that work to reduce the use of single occupant vehicles and reduce vehicle trips and vehicle miles traveled.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City utilizes the *CEQA Air Quality Handbook* as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

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

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

City of Los Angeles Green Building Ordinance

On April 22, 2008, the Los Angeles City Council approved Ordinance No. 179,820 (the Green Building Ordinance). The goal of the Green Building Ordinance is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional and global ecosystems. To achieve these goals, it must be demonstrated that certain projects in the City meet

the intent of the criteria for certification at the LEED certified level. The ordinance applies to the following categories of projects in the City:

- A new non-residential building or structure of 50,000 gross square feet of more of floor area;
- A new mixed use or residential building of 50,000 gross square feet or more of floor area in excess of six stories;
- A new mixed use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential uses;
- The alteration or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building; or
- The alteration of at least 50 dwelling units in an existing mixed use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

Unless these projects have been reviewed and the plans are stamped approved by the Director for LEED compliance, no building permits will be issued to these projects under the Ordinance. The Ordinance contains exceptions for the following projects:

- A Historic Resource, if the Department of City Planning finds that full LEED compliance would require alterations that conflict with the Secretary of the Interior's Standards for the Treatment of Historic Properties. In those cases, a LEED-AP, which is a person who has been designated a LEED Accredited Professional by the Green Building Certification Institute (GBCI), shall assert in writing that the project has incorporated all other reasonable measures to achieve LEED compliance, while avoiding adverse impacts to the Historic Resource's character-defining features;
- Any Project where plans were accepted by the Department of Building and Safety for plan check and the appropriate fee is paid prior to November 1, 2008, provided no changes were made to the project that would increase the floor area by more than five percent. This exception shall no longer be valid if construction is not commenced within one year of the date of issuance of the permit;
- Any entitlement application for a project filed and deemed complete with the exception of CEQA review prior to November 1, 2008, provided no changes are made to the application that would increase the floor area by more than five percent;
- Any residential or mixed use project of six or fewer stories where plans were accepted by the Department of Building and Safety for plan check and the appropriate fee is paid prior to May 1, 2009, provided no changes were made to the Project which increase the floor area by more than five percent. This exception shall no longer be valid if construction is not commenced within one year of the date of issuance of the permit; and

- Any entitlement application for a residential or mixed use project of six or fewer stories filed and deemed complete with the exception of CEQA review prior to May 1, 2009, provided no changes are made to the application that would increase the floor area by more than five percent.

ENVIRONMENTAL IMPACTS

Methodology

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the Proposed Project. Air pollutant emissions associated with the Proposed Project would result from project operations and from project-related traffic volumes. Construction activities would also generate air pollutant emissions at the project site and on roadways resulting from construction-related traffic. The net increase in project site emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to thresholds of significance recommended by the SCAQMD (see Project Impacts subheading, below).

Construction Emissions

The regional construction emissions associated with the Proposed Project are calculated using the URBEMIS 2007 computer model developed for the ARB by estimating the types and number of pieces of equipment that would be used to demolish existing structures, grade, and excavate the project site, construct the proposed development, and plant new landscaping within the project site. These construction emissions are analyzed according to the regional thresholds established by the SCAQMD and published in the CEQA *Air Quality Handbook*. The construction activities associated with the Proposed Project would cause diesel emissions, and would generate emissions of dust. Construction equipment within the project site that would generate criteria air pollutants could include excavators, graders, dump trucks, and loaders. Some of this equipment would be used during demolition and grading activities as well as when structures are constructed on the project site. In addition, emissions during construction activities also include export truck trips off-site to remove debris and delivery truck trips during the demolition phase. It is assumed that all of the construction equipment used would be diesel-powered.

In addition to SCAQMD's regional significance thresholds, the SCAQMD has also developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute 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,[6] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute

[6] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003.*

to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. For PM_{10} LSTs, the thresholds were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$ LSTs, the thresholds were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

The SCAQMD has developed five sample construction scenarios, one-acre, two-acre, three-acre, four-acre, and five-acre in size, where construction impacts do not exceed the most stringent LSTs. The sample scenarios were designed to be used as models or templates for analyzing construction air quality impacts by projects of similar size. As the project site is approximately 3.03 acres in size, the three-acre sample construction scenario is used as a template to analyze the significance of the construction emissions generated by the Proposed Project. In conducting the analysis, the parameters of the three-acre sample construction scenario are slightly modified such that they would apply to the project-specific characteristics of the Proposed Project. The parameters that have been modified in the three-acre sample construction scenario for the Proposed Project analysis include the number of equipment, the construction schedule, the square footage of the proposed structure, and the amount of dirt that would be handled at the project site. The resulting construction emissions generated are then analyzed against the applicable LSTs for a three-acre site.[7]

Operational Emissions

Operational emissions associated with the Proposed Project are estimated using the URBEMIS 2007 computer model developed for the ARB and the information provided in the traffic study prepared for the Proposed Project. Operational emissions would be comprised of mobile source emissions and area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the project site associated with operation of the Proposed Project. Area source emissions are generated by natural gas consumption for space and water heating, and landscape maintenance equipment. To determine if a regional air quality impact would occur, the increase in emissions would be compared with the SCAQMD's recommended regional thresholds for operational emissions.

As discussed above, the SCAQMD has developed LSTs that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. However, because the LST methodology is applicable to projects where emission sources occupy a fixed location, this methodology would typically not apply to the operational phase of a project because emissions are primarily generated by mobile sources. LSTs would apply to the operational phase of a project if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse/transfer facilities). Consequently, only the emissions generated by stationary sources associated with the Proposed Project (e.g., water and space heaters, landscaping equipment, etc.) are analyzed against the applicable LSTs.

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[7] *As the SCAQMD had only provided construction LST values for the one-acre, two-acre, and five-acre sites, the LST values for a three-acre site was estimated using the linear regression methodology recommended by the SCAQMD.*

Localized CO Concentrations

Localized CO concentrations are calculated based on a simplified CALINE4 screening procedure developed by the Bay Area Air Quality Management District and accepted by the SCAQMD. The simplified model is intended as a screening analysis, which identifies a potential CO hotspot. This methodology assumes worst-case conditions and provides a screening of maximum, worst-case CO concentrations. The emission factors used in the simplified CALINE4 model have been updated to EMFAC2007. The resulting emissions are compared with adopted national and State ambient air quality standards.

Greenhouse Gas Emissions

The emissions generated by the Proposed Project, and indeed any project, are too small to significantly influence global climate change on their own. Even if an individual project's GHG emissions were large enough to influence global climate change, the significance of the impact of a single project on global climate cannot be determined at this time. First, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. Second, global climate change models are not sensitive enough to be able to predict the effect of a single project on global temperatures and the resultant effect on climate; therefore, they cannot be used to evaluate the significance of a project's impact. Thus, insufficient information and predictive tools exist to assess whether a single project would result in a significant impact on global climate. Furthermore, there are currently no adopted thresholds or guidance adopted by the SCAQMD or other agencies in California to assess the significance of potential impacts associated with greenhouse gases. In the absence of established thresholds, however, the OPR nonetheless recommends, in its 2008 technical advisory, that lead agencies should make a good-faith effort to calculate, model, or estimate the amount of CO_2 and other GHG emissions from a project. In the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a "significant impact", the OPR recommends that individual lead agencies may undertake a project-by-project analysis that is consistent with available guidance and current CEQA practice. Thus, for the purpose of this analysis, a quantitative analysis containing an inventory of a project's GHG emissions and a qualitative analysis involving a project's compliance with adopted programs and policies to reduce GHG emissions, which is a method suggested by the Association of Environmental Professionals (AEP), have been conducted to evaluate the Proposed Project's potential effect on climate change.[8]

In terms of generating an inventory of the Proposed Project's GHG emissions, the California Climate Action Registry (CCAR) has prepared a protocol (CCAR Protocol) for calculating and reporting GHG emissions from a number of general and industry-specific activities. However, there is no clear guidance defining the extent to which direct and indirect emissions resulting from a project need be included under CEQA. For example, composting of yard waste and decomposing solid waste at landfills result in the emission of GHGs. From a global perspective, whether produced locally or throughout the world, the

[8] *Association of Environmental Professionals (AEP), Alternative Approaches to Analyzing Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007.*

manufacture and transport of construction materials result in the emission of GHGs, and the loss of forest to produce wood products reduces the Earth's ability to sequester carbon emissions. It is, however, reasonable to consider only the GHG emissions resulting from the incremental increase in usage of on-road mobile vehicles, electricity, and natural gas upon implementation of the Proposed Project as project-related. This approach is the same as that used in this EIR section for criteria pollutants.

During construction activities at the project site, the consumption of fuel by the on-site equipment would generate GHG emissions. The URBEMIS 2007 model, which estimates the daily amount of CO_2 emissions generated by on-site equipment during construction activities at the project site, is used to estimate the amount of GHG emissions that would result on a maximum (i.e., worst-case) construction day. During operation of the Proposed Project, the consumption of fossil fuels to generate electricity and to provide heating and hot water for the on-site land uses, as well as the consumption of fuel by on-road mobile vehicles associated with the Proposed Project, also creates GHG emissions. As such, in generating the GHG emissions for the Proposed Project, the future fuel consumption rates for the Proposed Project by these sources are estimated based on the proposed residential square footage. Natural gas and electricity demand factors derived from the SCAQMD's *CEQA Air Quality Handbook* are used to project fuel consumption rates. The GHG emission factors from the CCAR Protocol for natural gas and electricity are then applied to the respective consumption rates, to calculate annual GHG emissions in metric tons. The annual GHG emissions in metric tons generated by on-road mobile vehicles associated with the Proposed Project, which consist primarily of CO_2 emissions, are estimated using the URBEMIS 2007 computer model. The URBEMIS 2007 model estimates the daily amount of CO_2 emissions generated by on-road vehicles resulting from operation of a project. It should be noted that it is difficult to identify the specific generating source of electricity. The Los Angeles DWP produces power at City-operated plants and also imports power during peak demand periods. The emission factors used in this analysis represent a State-wide average of known power producing facilities, utilizing various technologies and emission control strategies, and do not take into account the DWP's unique emissions profile nor do they reflect targeted future reductions in GHG emissions under SB 1368 or the LA Green Plan. At this time, these emission factors are considered conservative and representative.

Not all greenhouse gases exhibit the same ability to induce climate change; as a result, greenhouse gas contributions are commonly quantified in carbon dioxide equivalencies (CO_2e). The GHG mass emissions for the Proposed Project are calculated by converting pollutant specific emissions to CO_2e emissions by applying the applicable global warming potential (GWP) value.[9] These GWP ratios are published in the CCAP Protocol. By applying the GWP ratios, the Proposed Project's CO_2e emissions are converted to metric tons per year.

For the qualitative GHG emissions analysis for the Proposed Project, the 2006 CAT Report, as discussed previously, has recommended a list of strategies that the State could pursue to reduce climate change greenhouse gas emissions. In addition, the ARB's Scoping Plan, which was approved in December 2008, also recommends measures that serve to reduce California's GHG emissions to 1990 levels by 2020.

[9] *CO_2E was developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) 1996.*

Thus, in the absence of regulatory guidance, this EIR will also address the potential impacts associated with GHG emissions resulting from implementation of the Proposed Project by evaluating qualitatively whether the Proposed Project would be consistent with any of the emission reduction strategies identified by the CAT and the recommended measures by ARB's Scoping Plan.

Thresholds of Significance

In accordance with Appendix G to the *State CEQA Guidelines*, the project would have a significant air quality impact on air quality if it would:

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

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

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

(d) Expose sensitive receptors to substantial pollutant concentrations; or

(e) Create objectionable odors affecting a substantial number of people.

Consistency with the Applicable AQMP

For general development projects, the SCAQMD recommends that consistency with the current AQMP be determined by comparing the population generated by the project to the population projections used in the development of the AQMP. Exceeding the AQMP population projections could jeopardize attainment of the air quality conditions projected in the AQMP, which would potentially result in a significant impact.

Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations

Regional Mass Daily Emissions

The SCAQMD's regional emission thresholds apply to all federally regulated air pollutants except lead, which is not exceeded in the Basin. Table IV.C-10, SCAQMD's Regional Emission Thresholds of Significance, shows the thresholds of significance published by the SCAQMD for construction and operational emissions that apply to development projects.

The SCAQMD also recommends that any construction-related and operational emissions from individual development projects that exceed the construction and operational thresholds, shown in Table IV.C-10, to be considered cumulatively considerable. These thresholds apply to individual development projects only; they do not apply to the combined emissions generated by a set of cumulative development projects.

Table IV.C-10
SCAQMD's Regional Emission Thresholds of Significance

Pollutant	Construction	Operation
	pounds/day	pounds/day
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Respirable Particulate Matter (PM_{10})	150	150
Fine Particulate Matter (PM2.5)	55	55
Nitrogen Oxides (NO_x)	100	55
Reactive Organic Gases (ROG)	75	55

Source: SCAQMD CEQA Air Quality Handbook, 1993, website: http://aqmd.gov/ceqa/handbook/signthres.doc, July 7, 2008.

Localized Daily Pollutant Concentrations

As discussed previously, the SCAQMD's LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. In addition, based on the size of the project site (i.e., approximately 3.03 acres), the three-acre sample construction scenario developed by the SCAQMD is used as a template to analyze the significance of the emissions generated by the Proposed Project. As such, construction and operational emissions associated with the Proposed Project, which is located within SRA 3 (Southwest Coastal Los Angeles County area), would be significant if they exceed the LSTs shown in Table IV.C-11, SCAQMD's Localized Significance Thresholds.

Cumulatively Considerable Net Increase of Criteria Pollutants

The SCAQMD's *CEQA Air Quality Handbook* identifies several methods to determine the cumulative significance of land use projects (i.e., whether the contribution of a project is cumulatively considerable). However, the SCAQMD no longer recommends the use of these methodologies. Instead, the SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[10] The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

[10] *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.*

Table IV.C-11
SCAQMD's Localized Significance Thresholds [a]

Pollutant Monitored Within SRA 3 — Southwest Coastal Los Angeles County Area	3 Acre Site				
	Allowable emissions (pounds/day) as a function of receptor distance (feet) from site boundary				
	82 (ft)	164 (ft)	328 (ft)	656 (ft)	1,640 (ft)
Construction Thresholds					
Nitrogen Oxides (NO_x)	153.00	148.33	160.00	184.00	247.67
Carbon Monoxide (CO)	1,262.33	1,523.33	2,055.00	3,430.33	9,119.67
Respirable Particulate Matter (PM_{10})	10.33	30.67	44.67	72.67	155.67
Fine Particulate Matter ($PM_{2.5}$)	6.00	8.33	14.33	28.33	86.00
Operational Thresholds					
Nitrogen Oxides (NO_x)	153.00	148.33	160.00	184.00	247.67
Carbon Monoxide (CO)	1,262.33	1,523.33	2,055.00	3,430.33	9,119.67
Respirable Particulate Matter (PM_{10})	2.67	8.00	11.00	17.67	37.67
Fine Particulate Matter ($PM_{2.5}$)	1.33	2.33	3.67	7.00	21.33

[a] *The localized thresholds for both construction and operational emissions for a 3-acre site in SRA 3 were calculated based on the linear regression methodology recommended by the SCAQMD.*
Source: SCAQMD, Final Localized Significance Threshold Methodology, Appendix C (Localized Significance Threshold Mass rate Look-up Table), June 2003, Revised July 2008.

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

Localized Pollutant Concentrations

The SCAQMD currently recommends that impacts to sensitive receptors be considered significant when a project generates localized pollutant concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ at sensitive receptors near a project site that exceed the localized pollutant concentration thresholds listed above or when a project's traffic causes CO concentrations at sensitive receptors located near congested intersections to exceed the national or State ambient air quality standards. The roadway CO thresholds would also apply to the contribution of emissions associated with cumulative development.

Greenhouse Gas Emissions

At present, no State or local agency has established quantitative significance thresholds for greenhouse gas emissions that would be applicable to the Proposed Project. Thus, while emissions of GHGs have been quantified for the Proposed Project, they have not been used to determine significance under CEQA.

In the absence of adopted quantitative thresholds, this EIR assumes that the Proposed Project would be considered to generate a cumulatively considerable increase in greenhouse gas emissions if it is not consistent with any strategies from the 2006 CAT Report and recommended measures from ARB's Scoping Plan that the Lead Agency deems to be applicable and feasible for the proposed land use.

L.A. CEQA Thresholds Guide

The City prepared the *L.A. CEQA Thresholds Guide* in 2006. For air quality, the City has not adopted specific citywide significance thresholds but instead relies on regional significance thresholds identified

by the SCAQMD in its CEQA *Air Quality Handbook* (SCAQMD CEQA Handbook), as revised in November 1993 and approved by the SCAQMD's Board of Directors. Thus, construction and operational emissions associated with the Proposed Project would be significant if:

Construction Emissions

- Construction emissions exceed the SCAQMD regional thresholds shown in Table IV.C-10 above.

Operational Emissions

- Operational emissions exceed the SCAQMD regional thresholds shown in Table IV.C-10 above.
- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
    - The Proposed Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or
    - The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.
- The project creates an objectionable odor at the nearest sensitive receptor.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance of a project with regards to toxic air contaminants shall be made on a case-by-case basis, considering the following factors:

Toxic Air Contaminants

- The regulatory framework for the toxic material(s) and process(es) involved;
- The proximity of the toxic air contaminants to sensitive receptors;
- The quantity, volume and toxicity of the contaminants expected to be emitted;
- The likelihood and potential level of exposure; and
- The degree to which project design will reduce the risk of exposure.

Project Impacts

In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the

Proposed Project, which comprises 260 residential units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the analysis below focuses on the incremental effects of constructing an additional 126 residential units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

AQMP Consistency

The 2007 AQMP, discussed previously, was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, and to return clean air to the region. Projects that are considered to be consistent with the AQMP would not interfere with attainment, because this growth is included in the projections used to formulate the AQMP. Therefore, projects, land uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

Projects that are consistent with the projections of population forecasts identified in the Growth Management Chapter of the RCPG are considered consistent with the AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP.

As discussed in Section IV.H. Population and Housing, construction of the Proposed Project is expected to result in approximately 374 net new permanent residents in the City of Los Angeles. Based on SCAG's projection for the City of Los Angeles, population is anticipated to increase by 416,156 between 2000 and 2015. Thus, the addition of an estimated 374 new residents under the Proposed Project would be well within the City's and SCAG's anticipated growth rate, representing 0.09 percent of the Citywide total growth for the period of 2000 to 2015. In addition, SCAG projections also estimate an increase of 1,532 residents within Census Tract 2766.02, which contains the project site, between 2000 and 2015. As such, the Proposed Project's generation of 374 net new permanent residents would be within SCAG's population projection for this period for Census Tract 2766.02. As the Proposed Project would be within the projections for population growth within Census Tract 2766.02, the Proposed Project would be consistent with the population projections for the Los Angeles Subregion. Consequently, the Proposed Project would not have the potential to jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin based on population generation in exceedance of projected growth.

Another measurement tool to determine consistency with the AQMP is to assess how a project accommodates 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.

The project site is in a highly urbanized area within the Westchester-Playa Del Rey Community Plan Area of the City of Los Angeles. The Proposed Project involves an infill development consisting of 260 residential and joint live/work units along with associated parking on a site that is surrounded by a highly developed urban area. Live/work developments reduce VMT by eliminating or reducing the home-to-work trips, which is usually at least two trips per day for most people. If an employee travels between three and ten miles to work, eliminating these trips would save 12-40 VMT per person per day. The project site is also located in proximity to many employment centers in neighboring communities including the City of El Segundo (approximately two miles south of the project site), the City of Santa Monica (approximately four miles northwest of the project site), and West Los Angeles (approximately 4.7 miles north of the project site). One of the objectives identified for the Proposed Project was to establish an infill development providing housing on-site to serve the local community in a manner consistent with the (T)(Q)RAS4-1-CDO zoning. This type of infill development would serve to minimize the VMT in the local community in which it is located. In addition, the Metropolitan Transportation Authority (Metro) and the Santa Monica Big Blue Bus Lines (BBB) are two public transit operators that provide service to the immediate project vicinity. Specifically, Metro Line 115/315 provides daily service between Playa del Rey and the City of Norwalk, with frequent service available on weekdays, weekends, and holidays. The BBB provides Line 3, which runs on a daily basis between UCLA and the Metro Green Line Station at Aviation Boulevard and Imperial Highway, and Line R3, which travels from Wilshire Boulevard and 4th Street in the City of Santa Monica to the Metro Green Line Aviation Station near LAX. In addition to these three lines, many more transit opportunities are available via transfers to other lines or transit providers. When these transfer opportunities are considered, all areas within the Los Angeles region are accessible using public transit. Thus, 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, thereby, minimizing the amount of air pollutant emissions. Therefore, the Proposed Project would be consistent with the goals of the AQMP for reducing the emissions associated with new development. Based on this information, the Proposed Project would not impair implementation of the AQMP, and this impact would be less than significant.

Construction Impacts

The Proposed Project involves the development of approximately 260 residential and joint live/work units located above three levels of parking. Three basic types of activities are expected to occur and generate construction-related emissions at the project site as a result of implementation of the Proposed Project. The first activity would involve the demolition of the existing 24,000 square feet of retail uses at the site, which includes two real estate offices, a health food store/acupuncture office, a Pilates/yoga studio, a gift shop, a karate/martial arts studio, an automotive service center, and an art supply store. The debris from the demolished buildings would be exported to a landfill. Secondly, the project site would be excavated to accommodate the building foundation for the proposed building, and the excavated soil would be exported. Finally, the proposed building would be constructed. Overall, construction activities at the project site would occur over an approximate 24-month period, with construction beginning approximately in January 2011.

Construction activities at the project site would generate pollutant emissions from the following construction activities: (1) demolition, grading, and excavation; (2) construction workers traveling to and from project

site; (3) delivery and hauling of construction supplies and debris to and from the project site; (4) the fuel combustion by onsite construction equipment; and (5) building construction, including the application of architectural coatings. These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving site preparation and grading would primarily generate PM_{10} emissions. Mobile source emissions (use of diesel-fueled equipment onsite, and traveling to and from the project site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

Regional Air Quality Impacts

The analysis of regional daily construction emissions has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table IV.C-12, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days. These calculations assume that appropriate dust control measures would be implemented during each phase of development as required by SCAQMD Rule 403 - Fugitive Dust. These standard fugitive dust control measures are applicable to all construction projects in the Basin.

Table IV.C-12
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition Phase (2011)						
Fugitive Dust	--	--	--	--	21.80	4.53
Off-Road Diesel	2.68	20.99	12.19	--	1.20	1.10
On-Road Diesel	4.53	57.71	22.20	0.08	2.61	2.23
Worker Trips	0.02	0.04	0.73	0.00	0.01	0.00
Total Emissions	***7.23***	***78.74***	***35.12***	***0.08***	***25.62***	***7.86***
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 (2011)						
Fugitive Dust	--	--	--	--	384.30	80.26
Off-Road Diesel Equipment	2.56	19.85	10.73	--	1.17	1.07
On-Road Diesel Equipment	4.24	54.05	20.79	0.08	2.44	2.09
Worker Trips	0.03	0.06	0.98	0.00	0.01	0.00
Total Emissions	***6.83***	***73.96***	***32.50***	***0.08***	***387.92***	***83.42***
Dust Control Measures [a]	0.00	0.00	0.00	0.00	(266.89)	(55.74)
Total Emissions after Dust Control Measures	***6.83***	***73.96***	***32.50***	***0.08***	***121.03***	***27.68***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Table IV.C-12 (Continued)
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Building Construction Phase (2011)						
Building Construction Off-Road Diesel Equipment	1.54	12.48	6.31	--	0.71	0.66
Building Construction On-Road Diesel Equipment [b]	2.52	31.10	10.01	0.04	1.49	1.30
Building Construction Vendor Trips	0.24	2.66	2.11	0.01	0.13	0.11
Building Construction Worker Trips	0.25	0.47	8.15	0.01	0.08	0.04
Total Emissions	***4.55***	***46.71***	***26.58***	***0.06***	***2.41***	***2.11***
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 (2012)						
Building Construction Off-Road Diesel Equipment	1.44	11.56	6.11	--	0.64	0.59
Building Construction On-Road Diesel Equipment [b]	2.27	27.83	9.19	0.04	1.35	1.16
Building Construction Vendor Trips	0.22	2.38	1.95	0.01	0.12	0.10
Building Construction Worker Trips	0.23	0.43	7.58	0.01	0.08	0.04
Architectural Coatings Off-Gas	48.29	--	--	--	--	--
Architectural Coatings Worker Trips	0.06	0.11	2.01	0.00	0.02	0.01
Total Emissions	***52.51***	***42.31***	***26.84***	***0.06***	***2.21***	***1.90***
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 (2013)						
Building Construction Off-Road Diesel Equipment	1.34	10.70	5.95	--	0.56	0.51
Building Construction On-Road Diesel Equipment [b]	2.04	19.10	6.90	0.04	1.20	1.03
Building Construction Vendor Trips	0.20	2.10	1.80	0.01	0.10	0.08
Building Construction Worker Trips	0.21	0.39	7.04	0.01	0.08	0.04
Architectural Coatings Off-Gas	48.29	--	--	--	--	--
Architectural Coatings Worker Trips	0.06	0.10	1.87	0.00	0.02	0.01
Total Emissions	***52.14***	***32.39***	***23.56***	***0.06***	***1.96***	***1.67***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

[a] *Dust control measures as required by SCAQMD Rule 403—Fugitive Dust.*

[b] *It is anticipated that approximately 30 concrete trucks would travel to the project site during peak construction days during the building phase. A roundtrip distance of 30 miles is assumed in the calculations. Emissions from on-road diesel equipment during the building phase are calculated using the Heavy Heavy Duty Diesel Truck (HHDT) Emission Factors from the ARB's EMFAC2007 (version 2.3) Burden Model. These emission factors are provided in Appendix D.*

Source: Christopher A. Joseph & Associates, December 2008. Calculation sheets are provided in Appendix D.

As shown in Table IV.C-12, construction-related daily emissions would not exceed the SCAQMD significance thresholds for ROG, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ during any of the construction phases. The PM_{10} and $PM_{2.5}$ emissions shown in Table IV.C-12 takes into consideration the implementation of the standard dust control measures as required by SCAQMD Rule 403 - Fugitive Dust. Consequently, impacts

associated with regional construction-related emissions from the Proposed Project during all construction phases would be less than significant.

Local Air Quality Impacts

The daily construction emissions generated by the Proposed Project are also analyzed against SCAQMD's LSTs to determine whether the emissions would cause or contribute to adverse localized air quality impacts. The nearest and most notable off-site sensitive receptors to the project site that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project include:

- The multi-family uses and the Westchester Church-Nazarene located approximately 100 feet north of the project site, across Manchester Avenue;
- The multi-family uses of the Playa del Oro mixed-use development, which is currently under construction, located approximately 15 feet east of the project site;
- The existing Custom Hotel located approximately 740 feet southeast of the project site;
- The single-family uses located immediately adjacent to the project site's southern edge;
- The Loyola Village Elementary School located approximately 178 feet south of the project site, across Villanova Avenue;
- The single-family uses located approximately 58 feet west of the project site, across Rayford Drive; and
- The Congregational Church of the Messiah located approximately 118 feet west of the project site, across Rayford Drive.

According to Table IV.C-11, the closest receptor distance on the SCAQMD's mass rate LST look up tables is 82 feet. Although some of the nearest off-site sensitive receptors to the project site (i.e., single-family residences to the south and west, and the proposed multi-family residential uses to the east) are closer than 82 feet, the SCAQMD's LST methodology states that projects with boundaries located closer than 82 feet (25 meters) to the nearest receptor should use the LSTs for receptors located at 82 feet.[11]

As discussed previously under Methodology, the three-acre sample construction scenario developed by the SCAQMD is used as a template to analyze the significance of the construction emissions generated by the Proposed Project. In conducting the analysis, the parameters of the three-acre sample construction scenario (e.g., construction schedule, number of equipment, amount of dirt handled, size of the areas disturbed, etc.) have been modified slightly such that they would apply to the project-specific characteristics of the

[11] *SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

Proposed Project. Table IV.C-13, Localized Estimated Daily Construction Emissions, identifies daily emissions that are estimated to occur during construction of the Proposed Project.

As shown in Table IV.C-13, on-site emissions generated by the Proposed Project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$ at a receptor distance of 82 feet. Thus, the on-site construction emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 82 feet (i.e., 164, 328, 656, and 1,640 feet). Therefore, the localized air quality impacts resulting from construction emissions associated with the Proposed Project would be less than significant.

Operational Impacts

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 for space and water heating devices, and the operation of landscape maintenance equipment. Mobile emissions would be generated by the motor vehicles traveling to and from the project site.

Table IV.C-13
Localized Estimated Daily Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition (2011)				
Onsite Combustion Emissions from Construction Equipment	32.71	16.83	1.74	1.60
Onsite Fugitive Dust Emissions from Construction Operations	--	--	0.68	0.14
Onsite Combustion Emissions from Mobile Vehicles	0.23	0.08	0.01	0.01
Total Emissions	***32.94***	***16.91***	***2.43***	***1.75***
SCAQMD Localized Thresholds [a]	153.00	1,262.33	10.33	6.00
Significant Impact?	No	No	No	No
Site Grading/Excavation (2011)				
Onsite Combustion Emissions from Construction Equipment	24.25	12.46	1.42	1.31
Onsite Fugitive Dust Emissions from Construction Operations	--	--	1.91	0.40
Onsite Combustion Emissions from Mobile Vehicles	1.32	0.42	0.06	0.06
Total Emissions	***25.57***	***12.88***	***3.39***	***1.77***
SCAQMD Localized Thresholds	153.00	1,262.33	10.33	6.00
Significant Impact?	No	No	No	No
Building (2011)				
Onsite Combustion Emissions from Construction Equipment	23.50	10.90	1.28	1.17
Onsite Combustion Emissions from Mobile Vehicles	0.21	0.07	0.01	0.01
Total Emissions	***23.71***	***10.97***	***1.29***	***1.18***
SCAQMD Localized Thresholds	153.00	1,262.33	10.33	6.00
Significant Impact?	No	No	No	No
Building (2012)				

Table IV.C-13 (Continued)
Localized Estimated Daily Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Onsite Combustion Emissions from Construction Equipment	21.78	10.63	1.16	1.07
Onsite Combustion Emissions from Mobile Vehicles	0.19	0.06	0.01	0.01
Onsite Combustion Emissions from Construction Equipment for Architectural Coatings	0.00	0.00	0.00	0.00
Onsite Combustion Emissions from Mobile Vehicles for Architectural Coatings	0.02	0.01	0.00	0.00
Total Emissions	***21.99***	***10.70***	***1.17***	***1.08***
SCAQMD Thresholds	153.00	1,262.33	10.33	6.00
Significant Impact?	No	No	No	No
Building (2013)				
Onsite Combustion Emissions from Construction Equipment	20.17	10.39	1.04	0.96
Onsite Combustion Emissions from Mobile Vehicles	0.16	0.06	0.01	0.01
Onsite Combustion Emissions from Construction Equipment for Architectural Coatings	0.00	0.00	0.00	0.00
Onsite Combustion Emissions from Mobile Vehicles for Architectural Coatings	0.02	0.01	0.00	0.00
Total Emissions	***20.35***	***10.46***	***1.05***	***0.97***
SCAQMD Thresholds	153.00	1,262.33	10.33	6.00
Significant Impact?	No	No	No	No

[a] *The localized thresholds for construction emissions at a receptor distance of 82 feet for a three-acre site in SRA 3 were calculated based on the linear regression methodology recommended by the SCAQMD.*

Source: Christopher A. Joseph & Associates, December 2008. Calculation sheets are provided in Appendix D.

Regional Air Quality Impacts

The analysis of daily operational emissions from the Proposed Project 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 generates air emissions based on the type and density of the proposed land uses, and is influenced by other factors such 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 an urbanized area of the City of Los Angeles, the project's proximity to public transit, etc., serve to reduce the air emissions that would be generated by the Proposed Project. The results of these calculations, and associated SCAQMD thresholds, are presented in Table IV.C-14, Estimated Future (2012) Daily Operational Emissions.

As shown in Table IV.C-14, the operational emissions associated with the Proposed Project would not exceed the established SCAQMD threshold levels for VOC, NO_x, CO, SO_x PM_{10}, and $PM_{2.5}$ during both the summertime (smog season) and wintertime (non-smog season). Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

Table IV.C-14
Estimated Future (2012) Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Future With Project Emissions						
Water and Space Heating, and Cooking Appliances	0.09	1.14	0.48	0.00	0.00	0.00
Landscape Maintenance Equipment	0.12	0.02	1.55	0.00	0.01	0.01
Consumer Products	5.95	--	--	--	--	--
Architectural Coatings	0.20	--	--	--	--	--
Mobile (Vehicle) Sources	5.87	5.44	70.17	0.08	13.74	2.61
Total Emissions	***12.23***	***6.60***	***72.2***	***0.08***	***13.75***	***2.62***
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						
Future With Project Emissions						
Water and Space Heating, and Cooking Appliances	0.09	1.14	0.48	0.00	0.00	0.00
Consumer Products	5.95	--	--	--	--	--
Architectural Coatings	0.20	--	--	--	--	--
Mobile (Vehicle) Sources	6.20	6.72	66.78	0.06	13.74	2.61
Total Emissions	***12.44***	***7.86***	***67.26***	***0.06***	***13.74***	***2.61***
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, July 2008. Calculation sheets are provided in Appendix D.

Local Air Quality Impacts

To determine whether operational emissions generated by the Proposed Project would result in localized air quality impacts, the operational emissions of the Proposed Project are analyzed against the SCAQMD's LSTs for a receptor location of 82 feet. As discussed previously under Methodology, the LST methodology is applicable to projects where emission sources occupy a fixed location. Consequently, this methodology would not apply to mobile sources associated with the Proposed Project. Instead, the LSTs would only apply to the emissions generated from stationary sources associated with the Proposed Project (e.g., water and space heaters, landscaping equipment, etc.). Table IV.C-15, Localized Estimated Daily Operational Emissions, analyzes the daily operational emissions generated by stationary sources associated with the Proposed Project against the SCAQMD's localized operational emission thresholds.[12]

[12] *The daily operational emissions generated by the stationary sources associated with the proposed project are taken from the emission sources (with the exception of the mobile sources) presented in Table IV.C-13 above that have been generated by the URBEMIS computer model.*

Table IV.C-15
Localized Estimated Daily Operational Emissions

Operational Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions				
Future With Project Emissions				
Water and Space Heating, and Cooking Appliances	1.14	0.48	0.00	0.00
Landscape Maintenance Equipment	0.02	1.55	0.01	0.01
Consumer Products	--	--	--	--
Architectural Coatings	--	--	--	--
Total Emissions	***1.16***	***2.03***	***0.01***	***0.01***
SCAQMD Localized Thresholds [a]	153.00	1,262.33	2.67	1.33
Significant Impact?	No	No	No	No
Wintertime (Non-Smog Season) Emissions				
Future With Project Emissions				
Water and Space Heating, and Cooking Appliances	1.14	0.48	0.00	0.00
Consumer Products	--	--	--	--
Architectural Coatings	--	--	--	--
Total Emissions	***1.14***	***0.48***	***0.00***	***0.00***
SCAQMD Localized Thresholds [a]	153.00	1,262.33	2.67	1.33
Significant Impact?	No	No	No	No

[a] *The localized thresholds for construction emissions at a receptor distance of 82 feet for a three-acre site in SRA 3 were calculated based on the linear regression methodology recommended by the SCAQMD.*

Source: Christopher A. Joseph & Associates, July 2008. Calculation sheets are provided in Appendix D.

As shown in Table IV.C-15, on-site operational emissions generated by the Proposed Project would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$. Thus, the localized air quality impacts resulting from operational emissions associated with the Proposed Project would be less than significant.

Localized CO Impacts

The SCAQMD recommends an evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse, and/or if the LOS worsens from C to D or worse. Based on the traffic study prepared for the Proposed Project, none of the proposed project traffic volumes would meet these criteria at the seven analyzed study intersections. As such, an evaluation of potential localized CO impacts associated with the Proposed Project would not be necessary, and impacts would be less than significant.

Toxic Air Contaminants

As the Proposed Project consists of the development of residential and joint live/work uses, and would not include any land uses that would typically involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, no toxic airborne emissions would typically result from its implementation**.** In addition, construction activities associated with the Proposed Project would be typical of other similar 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 that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

Objectionable Odors

Objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. Since the Proposed Project involves the development of residential and joint live/work units, no elements related to industrial projects and their odor producing elements are anticipated. Thus, impacts associated with objectionable odors during operation of the Proposed Project would be less than significant.

During the construction phase of the Proposed Project, potential sources of objectionable odors at the project site would be those associated with construction equipment exhaust and the exhaust generated by vehicles traveling to and from the project site. In addition, activities associated with the application of architectural coatings and other interior and exterior finishes may also 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, the odors would not be considered a significant environmental impact. Therefore, impacts associated with construction-generated odors are expected to be less than significant.

Consistency with General Plan Air Quality Element

Local jurisdictions, such as the City of Los Angeles, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions.

The Air Quality Element of the City of Los Angeles sets forth the goals, objectives, and policies that would guide the City in the implementation of its air quality improvement programs and strategies. A detailed analysis of the consistency of the Proposed Project with relevant policies in the City's General Plan Air Quality Element is presented in Table IV.C-16, Project Consistency with Applicable Policies of the General Plan Air Quality Element.

The Proposed Project would be consistent with goals, objectives, and policies set forth in the City's General Plan Air Quality Element, as it would be generally consistent with the applicable air quality policies discussed above. Therefore, no impact would occur with respect to consistency with the applicable air quality policies in the General Plan.

Greenhouse Gas Emissions

An individual project cannot generate enough greenhouse gas emissions to significantly influence global climate change. However, an individual project may contribute an incremental amount of GHG

Table IV.C-16
Project Consistency with Applicable Policies of the General Plan Air Quality Element

Policy	Consistency Analysis
Policy 1.3.1: Minimize particulate emissions from construction sites.	**Consistent.** Construction activities associated with the Proposed Project would be required to comply with the provisions under SCAQMD Rule 403—Fugitive Dust, which would require appropriate dust control measures to be implemented during each phase of development. Consequently, particulate emissions at the project site during construction of the Proposed Project would be minimized. Therefore, the Proposed Project would be consistent with this policy.
Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.	**Consistent.** Construction activities associated with the Proposed Project would be required to comply with the provisions under SCAQMD Rule 403—Fugitive Dust, which would require appropriate dust control measures to be implemented during each phase of development. Some of these dust control measures include daily watering of unpaved areas, and reducing vehicle speed on unpaved surfaces to less than 15 miles per hour. Therefore, the Proposed Project would be consistent with this policy.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**Consistent.** The Proposed Project would consist of the development of 260 residential and joint live/work units on a site that is adjacent to a mixed-use project (i.e., Playa del Oro project) that consists of multi-family residential, retail, and restaurant uses. As such, future residents of the Proposed Project would have close access to retail and restaurant establishments, which would encourage residents to walk and bike to neighborhood-serving retail uses within the project site and surrounding areas. Therefore, the Proposed Project would be consistent with this policy.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** As discussed under the consistency analysis for Policy 4.2.2, the Proposed Project would encourage residents to walk and bike to neighborhood-serving retail uses within the surrounding areas. In addition, the project site is located in proximity to existing public transit opportunities provided by the Metro and the BBB, which provide service to the immediate project vicinity. Furthermore, the Proposed Project would include a pedestrian access to the joint live/work units located along Manchester Boulevard. The Proposed Project would be consistent with this policy.
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The air quality analysis conducted for the Proposed Project in this Draft EIR serves to identify potential air quality impacts and, if necessary, recommend mitigation measures to reduce these impacts to a less-than-significant level. The analysis in this Draft EIR will be used by the City's Planning Commission in its review and approval process for the proposed project. Therefore, the Proposed Project would be consistent with this policy.

Source: Christopher A. Joseph & Associates, 2008.

emissions. For most projects, the main contribution of GHG emissions is from motor vehicles, but how much of those emissions are "new" is uncertain. New projects do not create new drivers, and therefore do not create a new mobile source of emissions. Rather, new projects only redistribute the existing traffic patterns. Larger projects will certainly affect a larger geographic area, but again, would not cause the creation of new drivers. Some mixed-use and transportation-oriented projects can actually reduce the number of vehicle miles traveled that a person drives.

Greenhouse Gas Inventory

Based on the methodology described under the Methodology heading of this section, the construction and operational GHG emissions for the Proposed Project have been calculated in metric tons per year as shown in Table IV.C-17, Predicted Proposed Project Greenhouse Gas Emissions. Also included in this table is the California Energy Commission's estimated 2004 State-wide inventory, the latest year for which data are available. As shown therein, the Proposed Project construction GHG emissions would be approximately 601.82 metric tons per year, while the 2004 Statewide Total emission level was 364,000,000 metric tons per year. Additionally, the net increase in GHG emissions from vehicle, electrical, and natural gas usage associated with operation of the Proposed Project would be approximately 211.03 metric tons per year.

Emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is not possible to predict the specific impact, if any, to global climate change from one project's relatively small incremental increase in emissions.

Compliance with 2006 CAT Report Strategies and ARB's Scoping Plan Recommended Measures

The following design features result in a reduction in criteria air pollutant and GHG emissions, and are proposed as part of the Proposed Project:

- The project site is located as adjacent to a mixed-use project (i.e., Playa del Oro project) that consists of multi-family residential, retail, and restaurant uses. Thus, the project site is located within walking distance of shopping sites for project residents.

- The Proposed Project would promote integrated urban living by offering residential amenities to complement and enhance the surrounding "Community Commercial" land uses and the surrounding Westchester-Playa del Rey community.

The consistency of the Proposed Project with the strategies from the 2006 CAT Report and the recommended measures in ARB's Scoping Plan is evaluated in Table IV.C-18 and Table IV.C-19, respectively. As shown, the Proposed Project would be consistent with all feasible and applicable strategies to reduce greenhouse gas emissions in California. Therefore, the impact of the Proposed Project would be less than significant.

Table IV.C-17
Predicted Proposed Project Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions in Metric Tons per Year
Proposed Project Construction	
Construction Emissions [a]	601.82
2004 Statewide Total [b]	364,000,000
Peak Annual Construction Increase as a Percentage of 2004 Statewide Total	0.000165
Proposed Project Operation [c]	
Natural Gas Consumption	301.56
Electricity Generation	238.55
Motor Vehicles	1,204.02
Total	***1,744.13***
Existing Uses [c]	
Natural Gas Consumption	45.10
Electricity Generation	118.68
Motor Vehicles	1,369.32
Total	***1,533.10***
Total Net Proposed Project Operational GHG Emissions	***211.03***
2004 Statewide Total [b]	364,000,000
Net Increase as a Percentage of 2004 Statewide Total	0.000058

[a] *Emissions represent the peak annual construction emissions associated with the Proposed Project over the 2011-2013 construction schedule generated by the URBEMIS 2007 computer model.*

[b] *Statewide totals were derived from the California Energy Commission: http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF.*

[c] *Emissions for natural gas and electricity consumption are calculated by applying the GHG emission factors from the CCAR Protocol for natural gas and electricity to their respective consumption rates to calculate annual GHG emissions in metric tons. The annual GHG emissions in metric tons generated by on-road mobile vehicles are estimated using the URBEMIS 2007 computer model.*

Source: Christopher A. Joseph & Associates, 2008. Calculation data and results are provided in Appendix D.

Table IV.C-18
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Air Resources Board	
Vehicle Climate Change Standards AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the ARB I September 2004.	**Consistent.** The vehicles that travel to and from the project site on public roadways would be in compliance with ARB vehicle standards that are in effect at the time of vehicle purchase.
Hydrofluorocarbon Reduction 1) Ban retail sale of HFC in small cans. 2) Require that only low GWP refrigerants be used in new vehicular systems.	**Generally Consistent.** This strategy applies to consumer products that may be used by the residential uses associated with the Proposed Project. All applicable products would be required to

Table IV.C-18 (Continued)
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
3) Adopt specifications for new commercial refrigeration. 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs. 5) Enforce federal ban on releasing HFCs.	comply with the regulations that are in effect at the time of manufacture.
Alternative Fuels: Biodiesel Blends ARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	**Generally Consistent.** The diesel vehicles that travel to and from the project site on public roadways could utilize this fuel once it is commercially available.
Alternative Fuels: Ethanol Increased use of E-85 fuel.	**Generally Consistent.** Residents of the Proposed Project could purchase flex-fuel vehicles and utilize this fuel once it is commercially available in the region and local vicinity.
Heavy-Duty Vehicle Emission Reduction Measures Increased efficiency in the design of heavy duty vehicles and an education program for the heavy duty vehicle sector.	**Generally Consistent.** The heavy-duty vehicles (e.g., refuse trucks) that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Achieve 50% Statewide Recycling Goal Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	**Consistent.** The Proposed Project would be subject to the requirements set forth in AB 939, which requires each city or county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting.
Zero Waste – High Recycling Efforts to exceed the 50 percent goal would allow for additional reductions in climate change emissions.	**Consistent.** The Proposed Project would be subject to the requirements of AB 939. In addition, the project site is located within the City of Los Angeles, which surpassed the State-mandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate. In 2001 and 2002, the City achieved a diversion rate of 63 and 62 percent, respectively. Furthermore, in 1999, the Mayor directed City departments to develop strategies to achieve the citywide recycling goal of 70 percent by 2015. The Proposed Project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
Department of Forestry	
Urban Forestry	**Consistent.**

Table IV.C-18 (Continued)
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	The landscaping proposed for the Proposed Project would include new trees, of equal value to those being replaced, pursuant to Los Angeles Municipal Ordinance 177,404 lining the project's street frontages and within the project site.
Department of Water Resources	
Water Use Efficiency Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions.	**Consistent.** The project applicant intends to comply with the City's proposed Green Building Program requirements, including the provision of water saving features and energy efficient features.
Energy Commission (CEC)	
Building Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	**Consistent.** The Proposed Project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. Implementation of the proposed Los Angeles Green Building Program requires the Proposed Project to meet Title 24 standards, which also meet the LEED standard.
Appliance Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	**Consistent.** Under State law, appliances that are purchased for the Proposed Project - both pre- and post-development – would be consistent with energy efficiency standards that are in effect at the time of manufacture.
Fuel-Efficient Replacement Tires & Inflation Programs State legislation established a statewide program to encourage the production and use of more efficient tires.	**Generally Consistent.** Residents the Proposed Project could purchase tires for their vehicles that comply with State programs for increased fuel efficiency.
Alternative Fuels: Non-Petroleum Fuels Increasing the use of non-petroleum fuels in California's transportation sector, as recommended as recommended in the CEC's 2003 and 2005 Integrated Energy Policy Reports.	**Generally Consistent.** Residents of the Proposed Project could purchase alternative fuel vehicles and utilize these fuels once they are commercially available in the region and local vicinity.
Business, Transportation and Housing	
Measures to Improve Transportation Energy Efficiency Builds on current efforts to provide a framework for expanded and new initiatives including incentives, tools	**Consistent.** The location of the Proposed Project promotes fuel conservation through pedestrian activity, nearby access

Table IV.C-18 (Continued)
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
and information that advance cleaner transportation and reduce climate change emissions.	to public transportation, and shopping in close proximity to homes.
Smart Land Use and Intelligent Transportation Systems (ITS) Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. ITS is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services. Governor Schwarzenegger is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through state investments, incentives and technical assistance, land use, and technology strategies that provide for a prosperous economy, social equity and a quality environment. Smart land use, demand management, ITS, and value pricing are critical elements in this plan for improving mobility and transportation efficiency. Specific strategies include: promoting jobs/housing proximity and transit-oriented development; encouraging high density residential/commercial development along transit/rail corridor; valuing and congestion pricing; implementing intelligent transportation systems, traveler information/traffic control, incident management; accelerating the development of broadband infrastructure; and comprehensive, integrated, multimodal/intermodal transportation planning.	**Consistent.** The Proposed Project locates new residential housing within walking distance of existing nearby commercial uses. In addition, the project site is located in proximity to existing public transit opportunities provided by the Metro and the BBB, which provide service in the immediate project vicinity.
State and Consumer Services Agency	
Green Buildings Initiative Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and –leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.	**Consistent.** As discussed previously, the Proposed Project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. Implementation of the proposed Los Angeles Green Building Program requires the Proposed Project to meet 2008 Title 24 standards.
Public Utilities Commission (PUC)	
California Solar Initiative	**Generally Consistent**

Table IV.C-18 (Continued)
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
The solar initiative includes installation of 1 million solar roofs or an equivalent 3,000 MW by 2017 on homes and businesses, increased use of solar thermal systems to offset the increasing demand for natural gas, use of advanced metering in solar applications, and creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	Although solar roofs are not currently included as part of the Proposed Project, the design of the new building structures would not preclude the installation and use of solar equipment in the future if they become cost effective from a purchase and maintenance standpoint of the property owners.
Sources: Climate Action Team, 2006 and Christopher A. Joseph & Associates, 2008.	

Table IV.C-19
Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
California Air Resources Board	
California Light-Duty Vehicle Greenhouse Gas Standards Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Generally Consistent.** The vehicles that travel to and from the project site on public roadways would be in compliance with ARB vehicle standards that are in effect at the time of vehicle purchase.
Energy Efficiency Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly-owned utilities).	**Consistent.** The Project applicant intends to comply with the City's proposed Green Building Program requirements, including the provision of water saving features and energy efficient features. The Proposed Project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. With implementation of the proposed Los Angeles Green Building Program requirements, the Proposed Project could exceed Title 24 standards. Furthermore, under State law, appliances that are purchased for the Proposed Project - both pre- and post-development – would be consistent with energy efficiency standards that are in effect at the time of manufacture.
Low Carbon Fuel Standard Develop and adopt the Low Carbon Fuel Standard.	**Generally Consistent.** Residents of the Proposed Project could purchase low carbon fuel once they are commercially available in the region and local vicinity.
Regional Transportation-Related Greenhouse Gas Targets	**Generally Consistent.** The passenger vehicles that travel to and from the

Table IV.C-19 (Continued)
Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Vehicle Efficiency Measures Implement light-duty vehicle efficiency measures.	**Generally Consistent.** The light-duty vehicles that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Million Solar Roofs Program Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Generally Consistent** Although solar roofs are not proposed as part of the Proposed Project, the design of the new building structures would not preclude the installation and use of solar equipment in the future if they become cost effective from a purchase and maintenance standpoint of the property owners.
Medium/Heavy-Duty Vehicles Adopt medium and heavy-duty vehicle efficiency measures.	**Generally Consistent.** The medium and heavy-duty vehicles that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Green Building Strategy Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The Project applicant intends to comply with the City's proposed Green Building Program requirements, including the provision of water saving features and energy efficient features.
High Global Warming Potential Gases Adopt measures to reduce high global warming potential gases.	**Consistent.** The Project applicant intends to comply with the City's proposed Green Building Program requirements, including the provision of water saving features and energy efficient features. The Project would also not preclude the implementation of this measure by the ARB.
Recycling and Waste Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** The Proposed Project would be subject to the requirements of AB 939. In addition, the project site is located within the City of Los Angeles, which surpassed the State-mandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate. In 2001 and 2002, the City achieved a diversion rate of 63 and 62 percent, respectively. Furthermore, in 1999, the Mayor directed City departments to develop strategies to achieve the citywide recycling goal of 70 percent by

Table IV.C-19 (Continued)
Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
	2015. The Proposed Project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
Water Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** The Project applicant intends to comply with the City's proposed Green Building Program requirements, including the provision of water saving features and energy efficient features.
Sources: Climate Action Team, 2006 and Christopher A. Joseph & Associates, 2008.	

The following planned City actions, as presented in the LA Green Plan, when implemented, may further decrease emissions of GHGs from the Proposed Project:

- Decreasing emissions from Department of Water and Power electrical generation and import activities;
- Providing compact fluorescent light (CFL) bulbs to encourage acceptance and use of CFLs; and
- Expanding the regional rail network to reduce VMT.

In addition, the Proposed Project is designed with a number of features which are consistent with the following City of Los Angeles goals:

- Promoting high-density housing close to mass transportation; and
- Creating walkable neighborhoods.

As discussed previously, the City of Los Angeles Green Building Ordinance contains an exception for residential or mixed use projects of six or fewer stories that filed an entitlement application and had it deemed complete, with the exception of CEQA review, prior to May 1, 2009. The applicant could have qualified for this exception by filing an entitlement application prior to May 1, 2009. Nonetheless, the applicant chose not to file the application prior to May 1, 2009 and will instead voluntarily comply with the Green Building Ordinance**.**

CUMULATIVE IMPACTS

AQMP Consistency

Cumulative development can affect implementation of the 2007 AQMP. The 2007 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Growth

considered to be consistent with the 2007 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2007 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Additionally, since the Proposed Project is consistent with SCAG's growth projections, and would minimize the VMT within the community in which the Proposed Project is located, it 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.

Construction Impacts

Because the Basin is currently in non-attainment for ozone, PM_{10}, and $PM_{2.5}$, cumulative development could violate an air quality standard or contribute to an existing or projected air quality violation. This is considered to be a significant cumulative impact. With respect to determining the significance of the Proposed Project's contribution to regional emissions, the SCAQMD neither recommends quantified analyses of cumulative construction emissions nor provides methodologies or thresholds of significance to be used to assess cumulative construction impacts. According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed previously, construction of the Proposed Project would not exceed the SCAQMD's threshold of significance for any of the criteria pollutants during all phases of construction. Therefore, the daily construction emissions associated with these criteria pollutants generated by the Proposed Project would not be cumulatively considerable. Therefore, the cumulative impact of the Proposed Project for ROG, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions during construction would be less than significant.

Operational Impacts

Due to the non-attainment of ozone, PM_{10}, and $PM_{2.5}$ standards in the Basin, the generation of daily operational emissions associated with cumulative development would result in a cumulative significant impact associated with the cumulative net increase of any criteria pollutant for which the region is in non-attainment. With respect to operational emissions, the SCAQMD has indicated that if an individual project results in air emissions of criteria pollutants (CO, ROG, NO_x, SO_x, PM_{10}, and $PM_{2.5}$) that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the Proposed Project region is in non-attainment under an applicable federal or state ambient air quality standard. As discussed previously, operational emissions associated with the Proposed Project would not exceed the SCAQMD's thresholds of significance for any of the criteria pollutants. Therefore, the cumulative impact of the Proposed Project for ROG, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions during operation would be less than significant.

Localized CO Impacts

Cumulative development is not expected to expose sensitive receptors to substantial pollutant concentrations. As discussed previously, the existing 1-hour and 8-hour CO concentrations at the study intersections currently do not exceed their respective national or State ambient air quality standards. For impacts associated with future 1-hour and 8-hour CO concentrations, the SCAQMD recommends an evaluation of potential localized CO impacts resulting from a project when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse, and/or if the LOS at the intersections worsens from C to D or worse. Based on the traffic study prepared for the Proposed Project, none of the future (2012) traffic volumes, which are based on the projected future traffic volumes from the Proposed Project, future ambient growth, and related projects in the project area, would meet these criteria at the seven analyzed study intersections. As such, an evaluation of potential localized CO impacts associated with the Proposed Project would not be necessary. Therefore, CO hotspots would not occur near these intersections in the future, and this cumulative impact would be less than significant; no significant project cumulative impact would occur for CO. It is also unlikely that future projects will result in long-term future exposure of sensitive receptors to substantial pollutant concentrations because CO levels are projected to be lower in the future due to improvements in vehicle emission rates predicted by the ARB. Therefore, the cumulative impact of the Proposed Project is considered to be less than significant.

Consistency with General Plan Air Quality Element

As is true for the Proposed Project, development of the related projects would also be reviewed for consistency with the City's air quality policies by the City of Los Angeles, in accordance with the requirements of CEQA, which require findings of policy consistency prior to approval of entitlements for development. For this reason, the cumulative impact associated with consistency of related projects with the City's air quality policies would be less than significant. In addition, as noted above, development of the Proposed Project would be consistent with the City's applicable air quality policies. Therefore, the cumulative impact of the related projects in combination with the Proposed Project would be less than significant.

Global Climate Change

In the absence of established quantitative thresholds to evaluate impacts associated with GHG emissions, consistency with adopted programs and policies to reduce GHG emissions has been suggested as a method to qualitatively evaluate the significance of cumulative impacts. A project's consistency with the implementing programs and regulations to achieve the statewide GHG emission reduction goals established under AB 32 cannot yet be evaluated because they are still under development. Nonetheless, the CAT has recommended strategies for implementation at the statewide level to meet the goals of GHG reduction. As shown in Table IV.C-18, the Proposed Project is consistent with all feasible and applicable strategies to reduce greenhouse gas emissions in California as identified in the 2006 CAT Report and the recent ARB's Scoping Plan. In addition to complying with the CAT strategies, implementation of the proposed Los Angeles Green Building Program standards could further reduce emissions. Therefore, the

potential impact on global warming resulting from implementation of the Proposed Project would not be cumulatively considerable.

MITIGATION MEASURES

No mitigation measures are required for the Proposed Project.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The level of significance for the Proposed Project's air quality-related impacts would be less than significant without implementation of mitigation.

IV. ENVIRONMENTAL IMPACT ANALYSIS
D. CULTURAL RESOURCES
1. ARCHAEOLOGICAL AND PALEONTOLOGICAL RESOURCES

INTRODUCTION

This section describes the impacts the Proposed Project may have on archaeological and paleontological resources.

ENVIRONMENTAL SETTING

Regulatory Framework

Federal, State, and local laws and guidelines govern the treatment of archaeological resources. There are specific criteria for demanding whether prehistoric or historic sites and objects are significant and/or protected by law. Federal and State significance criteria generally focus on the resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet Federal, State, and local laws and regulations that seek to mitigate impacts to significant prehistoric or historic resources are summarized below.

National Historic Preservation Act of 1996

The National Historic Preservation Act established the National Register of Historic Places (NRHP) to recognize resources associated with the country's history and heritage. Criteria for listing on the NRHP pursuant to Title 26, Part 63 of the Code of Federal Regulations are: significance in American history, architecture, archaeology, engineering, and culture as presented in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that are either: (a) associated with events that have made a significant contribution to the broad patterns of our history; (b) associated with the lives of persons significant in our past; (c) embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or (d) have yielded, or may be likely to yield information important to history. Criterion (d) is usually reserved for either archaeological or paleontological resources. Eligible properties must meet at least one of the criteria and exhibit integrity as determined by the degree to which the resource retains its historic properties, conveys its historic character, the degree to which the original fabric has been retained, and the reversibility of non-historic changes to the property.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) was created to identify resources deemed worthy of preservation on a State level and was modeled closely after the NRHP. The criteria are nearly identical to those of the NRHP but focus on resources of statewide, rather than national, significance. The CRHR automatically includes any resource listed, or formally designated as eligible for listing, on the NRHP.

The State Historic Preservation Office (SHPO) maintains the CRHR, which also includes properties designated under local ordinances or identified through local historical resources surveys.

California Senate Bill 297 (1982)

California Senate Bill 297 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; established procedures to be implemented if Native American remains are discovered during construction of a project; and establishes the authority of the Native American Heritage Commission to resolve disputes regarding the disposition of such remains. The bill has been incorporated into Section 15064.5(c) of the State CEQA Guidelines.

California Public Resources Code

According to Section 21083.2(g) of the California Public Resources Code, a "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.

3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Archaeological Resources

Definition of Archaeological Resources

According to the Archaeological Resources Protection Act of 1979, "the term 'archaeological resource' means any material remains of past human life or activities which are of archaeological interest, as determined under uniform regulations promulgated pursuant to this Act. Such regulations containing such determination shall include, but not be limited to: pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Nonfossilized and fossilized paleontological specimens, or any portion or piece thereof, shall not be considered archeological resources, under the regulations under this paragraph, unless found in an archaeological

context. No item shall be treated as an archaeological resource under regulations under this paragraph unless such item is at least 100 years of age."[1]

Archaeological Resources on the Project Site

The project site is in an urbanized area and it has been previously developed. According to the City of Los Angeles Planning Department, there are no designated archaeological sites or survey areas within the project site.[2] No archaeological surveys have been conducted within the project site that would have the potential to uncover any archaeological resources.

Paleontological Resources

Definition of Paleontological Resources

Paleontological resources include fossil remains, fossil localities, and formations that have produced fossil material in other nearby areas. Paleontological resources are limited, nonrenewable, sensitive scientific and educational resources include fossils preserved either as impressions of soft (fleshy) or hard (skeletal) parts, mineralized remains of skeletons, tracks, or burrows; other trace fossils; coprolites (fossilized excrement); seeds or pollen; and other microfossils from terrestrial, aquatic, or aerial organisms.

Paleontological Resources on the Project Site

The project site is in an urbanized area and it has been previously developed. According to the City of Los Angeles Planning Department, there are no paleontological sites or areas within the project site.[3] Surficial deposits in the project area consist of fill materials, which consist of silty sands and sands which are yellowish brown to grey, slightly moist, loose to medium dense, and fine to medium grained. These deposits typically do not contain significant vertebrate fossils, at least in the uppermost layers, and there are no records of vertebrate fossil localities anywhere nearby. However, at an unknown but probably very shallow depth in the project area there is a possibility of deposits containing fossils.[4]

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[1] *Archaeological Resources Protection Act of 1979 (As Amended) Section 3, http://www.cr.nps.gov/local-law/FHPL_ArchRsrcsProt.pdf, July 30, 2009.*

[2] *City of Los Angeles Planning Department, Environmental and Public Facility Maps, Prehistoric and Historic Archaeological Sites and Survey Area in the City of Los Angeles, 1994.*

[3] *City of Los Angeles Planning Department, Environmental and Public Facility Maps, Vertebrate Paleontological Resources in the City of Los Angeles, 1992.*

[4] *Geotechnical Engineering Investigation, prepared by Geotechnologies, Inc., dated October 11, 2004.*

Human Remains

No known human burials have been identified within the project site. The project site has been previously disturbed by development.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G of the State CEQA Guidelines

In accordance with guidance provided in Appendix G of the State CEQA Guidelines, the Proposed Project could have a potentially significant impact if it were to result in one or more of the following:

(a) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;

(b) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or

(c) Disturb any human remains, including those interred outside of formal cemeteries.

City of Los Angeles CEQA Thresholds Guide

Archeological Resources

Furthermore, as set forth in the City of Los Angeles *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory.

(b) Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions.

(c) Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind.

(d) Is at least 100-years old[5] and possesses substantial stratigraphic integrity.

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[5] *Although the CEQA criteria state that "important archaeological resources" are those which are at least 100-years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.*

(e) Involves important research questions that historical research has sown can be answered only with archaeological methods.

Paleontological Resources

Furthermore, as set forth in the City of Los Angeles *Draft L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource.

(b) Whether the paleontological resource is of regional or statewide significance.

Project Impacts

Archaeological Resources

There are no known archaeological resources on the project site. Archaeological resources that may have existed on the site have likely been previously unearthed or disturbed. Furthermore, the possibility for archaeological resources is unlikely given the project site is not located in an area designated by the City of Los Angeles General Plan Framework EIR or the Environmental and Public Facilities Maps of the City Planning Department of the City of Los Angeles as being in an archaeological site or survey area.[6] The anticipated excavation activities associated with the Proposed Project would include the foundations and utilities, as well as one subterranean level of parking. However, in the event that subsurface resources are encountered during the course of grading and/or excavation, per the California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, all development is required to temporarily cease in these areas until the City of Los Angeles Planning Department 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. With the implementation of mitigation measures listed below, impacts from the development of the Proposed Project on any archaeological resources would be reduced to a level of less than significant.

Paleontological Resources

There are no known paleontological resources on the project site. Any paleontological resources that may have existed on the project site have likely been previously unearthed or disturbed. Furthermore, the possibility for paleontological resources is unlikely given the Proposed Project site is not located in an area designated by the City of Los Angeles General Plan Framework EIR or the Environmental and

[6] *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Section 2.15, Cultural Resources, Figure CR-1, January 1995 and the City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

Public Facilities Maps of the City Planning Department of the City of Los Angeles as a paleontological site or survey area.[7] No vertebrate fossil sites have been identified in the vicinity of the project site and therefore topsoil and previously disturbed surficial layers in the project area are not likely to contain substantive vertebrate fossils. The project site has been previously disturbed, paved, and developed with commercial uses. Excavations anticipated for the Proposed Project are those associated with foundations, utilities installation, and one subterranean level of parking. While it is possible that paleontological resources could be discovered during construction activities, it is unlikely due to previous disturbance and development of the project site. However, in the event that paleontological resources are encountered during the course of grading and/or excavation, per the California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, all development is required to temporarily cease in these areas until the City of Los Angeles Planning Department is contacted and agrees upon a qualified paleontologist to be brought onto the project site to properly assess the resources and make recommendations for their disposition. With the implementation of mitigation measures listed below, impacts from the development of the Proposed Project on the paleontological resources would be reduced to a level of less than significant.

Human Remains

No known human burials have been identified on the project site. Excavations anticipated for the Proposed Project are those associated with foundations, utilities installation, and one subterranean level of parking. While it is possible that human remains could be discovered during construction activities there would be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These code provisions require notification of the County Coroner and the Native American Heritage Commission; if the remains are found to be of a Native American, the County Coroner and Native American Heritage Commission must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent remains. With the implementation of the precautionary guidelines mentioned above, potential impacts on human remains would be less than significant.

CUMULATIVE IMPACTS

Development of the Proposed Project in combination with the 19 related projects listed in Section II. Environmental Setting, would result in the increased potential for encountering archaeological and paleontological resources in the project vicinity. The potential that one or more of these related projects might encounter archaeological or paleontological resources during the course of development is

[7] *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Section 2.15, Cultural Resources, Figure CR-21, January 1995 and the City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

determined by such factors as whether prehistoric human presence had occurred at any given related project site, and the type of proposed development activities at the site. However, not all archaeological and paleontological resources are of equal scientific value. While some have the potential to be scientifically important due to rarity of their ability to provide new information, many of these resources are common and have little scientific value. Therefore, the significance of cumulative impacts to archaeological and paleontological resources is not determined simply by the frequency of the encounter, but by the nature of that encounter. The mere fact of an encounter does not imply an adverse impact.

With appropriate mitigation, such an encounter may lead to the recovery of scientifically important archaeological or paleontological resources that would not have been exposed without these activities. Considering that the discovery of archaeological and paleontological resources is a fairly rare event, the discovery of a scientifically important archaeological or paleontological resource is even more rare an event; the fact that discovery of rare resources may lead to their recovery rather than their destruction, it is not anticipated that there would be a significant adverse cumulative impact to archaeological or paleontological resources. Further, CEQA requirements for protecting archaeological and paleontological resources are applicable to development in the City of Los Angeles, as are other local cultural resources protection ordinances. If subsurface cultural resources are protected upon discovery as required by law, impacts to those resources would not be cumulatively considerable.

MITIGATION MEASURES

Archaeological Resources

D-1. A covenant and agreement shall be recorded between the Proposed Project and the City of Los Angeles Department of City Planning prior to obtaining a grading permit stating that if any archaeological resources are encountered during Project development, the project shall be halted. The services of an archaeologist shall be secured by contacting the South Central Coastal Information Center (SCCIC), or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. If an archaeological survey, study or technical report is prepared, copies shall be submitted to the SCCIC.

Paleontological Resources

D-2. A covenant and agreement shall be recorded between the Proposed Project and the City of Los Angeles Department of City Planning prior to obtaining a grading permit stating that if any paleontological materials are encountered during the course of the project any paleontological materials are encountered during the course of the project development, the project shall be halted. The services of a qualified paleontologist approved by the City or County of Los Angeles and the Los Angeles County History Museum (LACM) Vertebrate Paleontology shall be retained to assess the resources and evaluate the impact. If a paleontological survey, study or technical report is prepared, copies shall be submitted to the LACM.

Human Remains

D-3. If human remains are discovered at the project site during construction, work at the construction site shall be suspended, and the City of L.A. Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment of disposition of the remains.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the mitigation measures listed above, the Proposed Project would have a less than significant impact with respect to archaeological and paleontological resources.

IV. ENVIRONMENTAL IMPACT ANALYSIS
E. HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section evaluates potential impacts related to hazards and hazardous materials associated with development of the Proposed Project. It discusses whether the Proposed Project would create a significant hazard to the public or the environment due to its proximity to hazardous conditions and/or hazardous materials. This analysis is based on the findings of *the Phase I Environmental Site Assessment of Playa Del Oro Parcel 5*, prepared by EMG, dated December 1, 2006 and the *Phase I Environmental Assessment Report for Furama Hotel and Adjoining Properties, at Corner of Manchester Avenue and Lincoln Boulevard, Los Angeles, CA 90045,* prepared by EMG, dated August 18, 2000. These reports are included as Appendix E to this Draft EIR.

ENVIRONMENTAL SETTING

Existing Uses

The project site is approximately 3.03 acres (131,943 square feet) and is located at 7270 through 7298 West Manchester Avenue and 8624 Rayford Drive. The project site is located west of Lincoln Boulevard and the Playa Del Oro construction site, north of single-family residential uses, and east of Rayford Drive. The western portion of the project site is currently developed with three existing structures which contain eight separate commercial uses, totaling 24,000 square feet, including: Re/Max Realty, Sunflower Health Food Store, a Pilates/yoga studio, ADA Creation (a gift shop), a karate/martial arts studio, All Cities Real Estate, an automotive repair center, and Graphaids art supply store. The eastern portion of the project site is currently vacant.[1]

Surrounding Uses

The project site and immediate vicinity slope gently downward to the southeast while areas to the west of the project site slope downward to the west and areas north of the project site slope downward to the north. These areas are developed with single- and multi-family residential, retail, commercial, educational, public facilities, and religious uses.

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[1] *In 2004, City Council adopted a Mitigated Negative Declaration ("MND") for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site (the eastern portion of the current project site), which will no longer be constructed. In lieu of constructing the previously-approved, vested, and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project. See section III. Project Description, for a description of the Proposed Project.*

Sensitive Receptors

Surrounding uses that would be considered sensitive receptors with respect to hazardous material exposure include the residential uses located north, south, and west of the project site, the churches located north across Manchester Avenue from the project site and west across Rayford Drive from the project site, the Loyola Village Elementary School located approximately 178 feet south of the project site, and the Westchester Recreation Center located approximately 0.2 miles east of the project site.

Historic Use of the Project Site

Summary of Site History

The project site was developed with three small residential structures sometime between 1938 and 1953 according to an aerial photograph taken in 1938 showing no development and an aerial photograph taken in 1953 showing the three small residential developments. By 1963, the project site was developed with a single retail-type building and associated surface parking lot. By 1981, an on-site vehicle repair station had been developed. In 1997, the western portion of the project site had been improved with a retail-type building that closely resembles the current improvements. Until 2007, the eastern portion of the project site was developed with buildings associated with the former Furama Hotel.

Historical Aerial Photographs

Historical photographs between the years 1938 and 2004 were used to ascertain the historical use of the project site. A 1938 photograph shows the project site as farmland and completely undeveloped. By 1953, the project site is improved with what appear to be three residential structures. In 1963, the project site had been redeveloped and improved with one retail-style building and an associated parking area. Aerial photographs taken in 1972 and 1985 identify the same retail-type buildings that currently exist on the western portion of the project site. By 1997, the western portion of the project site had remained developed with retail-style buildings resembling the current on-site uses, and the eastern portion of the project site was developed with buildings associated with the former Furama Hotel. See Figure II-5 for an aerial photograph depicting the existing on-site uses.

Previous Investigations

A previous environmental assessment dated August 18th, 2000 was identified for the entire block containing the project site and the commercial uses extending southeast to Loyola Boulevard. The environmental assessment does not identify any reported incidents of leakage or contamination regarding the underground storage tanks (USTs) used by the on-site auto mechanic or by the former hardware store. In addition to the improvements described above, the August 2000 Phase I identifies a possible former service station located at the southeast corner of the intersection of Manchester Avenue and Rayford Drive, at 7298 West Manchester Avenue, that was in operation until 1989. The on-site gasoline tanks were removed in 1989. However, there was some concern expressed regarding the nearby Carriage Cleaners located along Lincoln Boulevard. A Phase II, Subsurface Investigation, was conducted for the Re/Max and former service station property located on-site and the Carriage Cleaners property located off-site on November 19, 2001. Analysis of existing soils indicated no detectable levels of gasoline-

related hydrocarbons (BTEX or MTBE) beneath the Re/Max property and the concentrations of metal reported were at background levels. Relatively low concentrations of diesel range hydrocarbons were reported in three of 12 soil samples collected from beneath the auto mechanic. These concentrations ranged from below laboratory reporting limits to 17 parts per million, which is below the guidance level set in the *California Leaking Underground Fuel Tank (LUFT) Manual*. At the Carriage Cleaners site, no reportable concentrations of "perc" (tetrachloroethene), the dry cleaning solvent, were reported in the soils near the cleaners. The soil sample analysis provides supporting evidence that neither a UST nor a dry cleaning release occurred at or near the project site prior to 2001.

Project Site Reconnaissance

Site reconnaissance was conducted October 9, 2006. The following paragraphs describe the conditions at the project site as reported in the technical report.

Topography and Drainage

The project site is located at an elevation of approximately 155 feet above mean sea level (msl) with a two to five percent slope trending southeast.[2] Drainage from the site is via sheetflow into the adjacent streets and towards localized area drains and the nearby Playa Del Oro construction site.

Storage Tanks

Based on the August 2000 Phase I prepared for the block containing the project site and immediate commercial area, a total of three USTs were historically and are currently operating on-site. The first of the three storage tanks was associated with the former service station located on-site. Though it is unknown what the exact capacity of the storage tank was, the Facility Inventory Database for underground storage tanks (CA FID UST database) listing for this UST indicates that the facility is "inactive." Further, a letter from the Los Angeles Fire Department (LAFD) dated September 1989 indicates that the UST had been removed, and based on the information provided to LAFD, no further action was required. The second storage tank identified was a 7,500-gallon capacity tank installed in 1964 for use at the former Gerald's Hardware Store. This UST was listed on several UST databases; however, no additional information is provided regarding the construction, use, or current status of the UST and the Gerald's Hardware Store site. The last of the three storage tanks is currently in use by the existing on-site auto mechanic and has a capacity of 7,500 gallons. This storage tank was installed in 1989 and is utilized to store the used motor oil generated during vehicle maintenance. There have been no reported leaks or spills related to this storage tank and this use is not listed on any database which reports spills, incidents, or releases. Laboratory analysis of soil samples collected during a 2001 Phase II subsurface assessment indicated no detectable levels of gasoline-related hydrocarbons (including BTEX or MTBE) in soils beneath the auto mechanic or adjacent to the in-use waste oil storage tank. The concentrations of metal on-site were within background levels. Also, relatively low concentrations of

[2] *United States Department of the Interior, Geological Survey, Venice Quadrangle, California, Los Angeles Co., 7.5 Minute Series (Topographic), 1964, Photo Revised 1981, map.*

diesel range hydrocarbons were reported in three of the 12 soil samples ranging between below laboratory reporting limits to 17 parts per million, below the guidance levels set forth in the *California LUFT Manual*.

No above-ground storage tanks (ASTs) were observed during site reconnaissance and no records of past ASTs were reported for the project site.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) are mixtures of chlorinated compounds which can exist as vapor, oily liquids, or solids. PCBs have been used as coolants and lubricants in transformers and other electrical equipment because they do not burn easily and are good insulators. When PCBs leak into the air, water, and soil, they can result in skin rashes and liver damage to humans. PCBs are also probable human carcinogens. In 1977, the U.S. government banned production of PCBs.

One exterior pad-mounted transformer was identified as serving the project site. This transformer is owned and maintained by the Los Angeles Department of Water and Power (LADWP) and is considered non-PCB containing based upon the recent date(s) of installation. Four vehicle hydraulic lifts associated with the on-site auto mechanic were also encountered. Because PCB hydraulic fluid has not been manufactured since 1977 and these lifts were installed post-1977, PCB-containing hydraulic fluid is not likely to be encountered in this equipment. Finally, it is not known whether fluorescent light ballasts are present within the structures. Older light ballasts associated with this type of light fixture were typically manufactured with fluids containing PCBs. Newer light ballasts (post 1969) were typically manufactured free of PCBs and will generally be labeled “No PCBs.”

Asbestos-Containing Materials

Asbestos-containing materials (ACMs) are materials that contain asbestos, a naturally-occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. When left intact and undisturbed, these materials do not pose a health risk to building occupants. There is, however, potential for exposure when ACMs become damaged to the extent that asbestos fibers become airborne and are inhaled. These airborne fibers are carcinogenic and can cause lung disease. The age of a building is directly related to its potential for containing elevated levels of ACMs. Asbestos was utilized routinely in many building materials until 1978. The Environmental Protection Agency (EPA) recommends a proactive in-place management program be implemented wherever ACMs are found in a building; ACMs that are not damaged may remain in place. The EPA also recommends that damaged ACMs be removed, repaired, encapsulated, or enclosed. Prior to any renovation or demolition activities, the EPA recommends that all ACMs be removed from a project site.

During site reconnaissance, two suspect ACMs were identified: 12” x 12” resilient floor tile/mastic and roofing material. The floor tile/mastic was not tested for asbestos content because it was in good condition, and thus did not necessitate sampling. The roofing material was not tested for asbestos content because it too was in good condition and sampling had the potential to void an existing warranty. However, the U.S. EPA identifies both materials as suspect ACMs regardless of installation date in its

publication Managing Asbestos in Place (the "Green Book"). The "suspect" designation necessitates sampling prior to any repair, renovation, or demolition activities that may disturb these materials.

Lead-Based Paint

Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACMs, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance will result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore, buildings, built before 1978 are likely to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.

According to the Phase I environmental assessment prepared for the project site, lead based paint usage was not sought because no residences exist on the project site. However, a previous LBP analysis was prepared by ACS Associates dated June 2, 1998. The analysis conducted at least two wipe samples from on-site structures. Specifically, two lead wipe samples were collected from the Re-Max structure (west conference room and southeast meeting room). Results of the wipes indicated that the lead samples were below the Federal Standards and no further work or assessment was recommended.

Containers of Hazardous or Unidentified Substances

Upon site reconnaissance, between five and ten five-gallon paint cans were identified on-site and located specifically in the electrical room of the Re-Max building. In addition, between five and ten one-gallon parts washing solvent containers were encountered on-site and are located in the auto mechanic structure. This product generates a waste that is either hazardous or regulated. Further, approximately 20 oil canisters were encountered on-site in the auto mechanic structure. Used oil filters are disposed of in two 55-gallon drums, and the liquid drains into floor drains which are connected to a clarifier and UST. Also encountered were approximately 20 one-gallon antifreeze containers located in the auto mechanic structure. The use of antifreeze generates waste that is either hazardous or regulated.

Solid Waste Disposal

Commercial waste from the on-site businesses and tenants appears to be the only solid waste generated. This waste is collected in dumpsters and picked up by the municipal trash service.

Radon

A *California State Radon Survey* has been conducted by the Department of Health Services (DHS) in conjunction with the United States Environmental Protection Agency (EPA). The California survey is part of an ongoing program by the EPA to measure levels of radon in all states in the country. In this report, California was organized into nine sampling regions using general geology, climate, and existing radon distribution knowledge. The geographically distributed results were later weighted for population distribution by the EPA. The project site is located in the City of Los Angeles, within Los Angeles County. The results of the survey indicate that 98 percent of all homes in the region have radon

concentrations below four picoCuries/liter of air (pCi/L). Due to the low concentrations of radon in the region, it is unlikely the project site would be impacted by the presence of radon. Further, according to the Phase I environmental assessment, radon was not addressed as part of the assessment because no residences exist on-site. Additionally, no prior sampling results were provided for review of previous radon levels.

Wells

No evidence of monitoring wells was observed at the project site.

Methane Gas

Methane is generated by the biodegradation of organic matter in the absence of oxygen. Methane is not toxic; however, it is combustible and potentially explosive at concentrations above 53,000 parts per million (ppm) in the presence of oxygen. 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. The project site is located within a Methane Buffer Zone.[3]

Other Conditions of Concern

Currently, there are between 20 and 30 used tires on-site located inside the auto mechanic structure. Used tires are considered hazardous waste and are picked up and disposed of by a licensed waste handler. No other evidence of known or observed environmentally sensitive conditions was visible at the site.

Regulatory Framework

A variety of laws and regulations governing the management and control of hazardous substances has been established at the federal level to protect the environment. These regulations fall under the jurisdiction of the United States EPA and include the following principal laws:

- The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or "Superfund," creates national policy and procedures to identify and cleanup sites where hazardous substances have been released into the environment and provides the mechanisms by which these remedial actions are financed. Additionally, the Superfund Amendment and Reauthorization Act (SARA), which extended and amended CERCLA, required that due diligence be exercised in the investigation of past and current handling of hazardous substances prior to property sale.

[3] *City of Los Angeles, Zoning Information and Map Access System (ZIMAS), website: http://zimas.lacity.org, accessed July 2, 2008.*

- The Resource Conservation and Recovery Act (RCRA) was enacted in 1974 as the first step in regulating the potential health and environmental problems associated with solid hazardous and non-hazardous waste disposal.
- The Toxic Substances Control Act (TSCA), enacted in 1976, regulates and controls harmful chemicals and toxic substances in commercial use, in particular PCBs.
- The Federal Insecticide, Fungicide, and Rodenticide Act (as amended) controls the manufacture, use, and disposal of pesticides and herbicides.
- The Hazardous and Solid Waste Act (HSWA) includes the 1984 amendments to RCRA to address gaps in the area of highly toxic wastes.
- Title 29 Code of Federal Regulations (CFR), Park 1910 contains the Occupational Safety and Health Administration (OSHA) requirements for workers at hazardous waste sites including emergency response, hazard communication, and personal protective equipment.

At the State level, California has developed hazardous waste regulations that are similar to the federal laws, but that are much more stringent in their application. The basic law established in California, similar to RCRA, is the Hazardous Waste Control Law (HWCL). More detailed information concerning the implementation of these requirements is given in Title 22 of California Code of Regulations (CCR), Chapter 230. The HWCL empowers the Department of Toxic Substances Control (DTSC), a division of CAL EPA (formerly part of the Department of Health Services), to administer the State's hazardous waste program and implement the federal program in California. This law includes UST regulation.

Other relevant State laws include the following:

- Proposition 65 focuses on carcinogenic or teratogenic contaminants and implements the State's community-right-to-know program.
- UST Law that regulates underground storage to prevent groundwater contamination.
- Porter-Cologne Water Quality Control Act, adopted in 1969, requires the maintenance of the highest reasonable quality o the State's waters. It authorizes the Regional Water Quality Control Board (RWQCB) to supervise cleanup efforts at spill sites that have affected groundwater.

The DTSC has the primary responsibility for enforcement and implementation of hazardous waste control laws in the State. However, this responsibility is shared with other State and local government agencies, including the State Water Resources Control Board (SWRCB), RWQCB, and City and County governments.

At the local level, the LAFD administers hazardous materials environmental compliance programs within City jurisdiction. These programs include hazardous materials disclosure and business plans, underground storage tank programs, aboveground storage tank spill prevention control and countermeasures, hazardous waste generator programs (administered by Los Angeles County Fire Department), and the California Accidental Release Prevention Program.

Regulatory Agency Search

On-Site

The project site was listed on four of the environmental databases that were reviewed. These databases include: the California Facility Inventory Database (CA FID), the Underground Storage Tank (UST) database, the Hazardous Waste Information System (HAZNET) database, and the Statewide Environmental Evaluation and Planning System (SWEEPS) database. These databases all provided information about the former and current USTs operated on-site associated with the former service station, the former Gerald's Hardware Store, and the current auto mechanic.

Off-Site

Three properties in the vicinity of the project site were checked for listing on governmental databases. Two of these properties are listed in more than one database. The following paragraphs provide a brief explanation of the nine databases containing these properties.

The Airport Marina Hotel, AMFAC Hotel, and Furama Hotel (which formerly occupied the eastern portion of the project site) are listed on the RCRA-TSD, FINDS, HAZNET, and RCRA-SQG databases. The waste category is listed as an "organic" small quantity generator with no reported releases or violations.

The Loyola Village Elementary School is listed on the Facility Index System (FINDS) database. However, no releases or contamination issues have been reported regarding this location.

The Otis College of Art and Design is listed on the HAZNET and Emissions Inventory Data (EMI) databases. The waste category is listed as "photo-chemicals and photo-processing waste" with no releases, contamination issues, or violations reported.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Proposed Project could have a potentially significant impact upon hazards and hazardous materials if it were to:

(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 hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials in to 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 complied 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, 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, result in a safety hazard for people residing or working in the project area;

(g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

(h) Expose people or structure 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.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination shall be made on a case-by-case basis, considering the following factors:

(a) The regulatory framework;

(b) The probable frequency and severity of consequences to people or property as a result of a potential accidental release of explosion of a hazardous substance;

(c) The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences;

(d) The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;

(e) The regulatory framework for the health hazard;

(f) The probable frequency and severity of consequences to people from exposure to the health hazard; or

(g) The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Project Impacts

Routine Transport, Use, or Disposal of Hazardous Materials

Construction

Construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of residential development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the Proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. Furthermore, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. For example, the Proposed Project would be required to implement standard best management practices (BMPs) set forth by the City and the Los Angeles Regional Water Quality Control Board (LARWQCB) which would ensure that wastes generated during the construction process are disposed of properly. Therefore, the Proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction. Impacts would be less than significant.

Operation

Operation of the Proposed Project would involve the transport, use, and disposal of hazardous materials typically associated with residential uses. Hazardous materials commonly used in the operations of residential uses include minimal amounts of solvents and household products used for routine cleaning, maintenance, and landscaping. Therefore, the uses developed under the Proposed Project would not involve the routine transport, use, or disposal of substantial amounts of hazardous materials. Impacts would be less than significant.

Storage Tanks

The three USTs operating historically and currently on-site associated with the former service station, the former Gerald's Hardware Store, and the current on-site auto mechanic all possess a different status. The UST associated with the former service station was removed from the project site by 1989 while the UST associated with the former Gerald's Hardware Store possess an unknown status, and the UST associated with the on-site mechanic is currently in operation with no reported spills, leaks, or other environmental violations. Upon demolition, the removal of the UST associated with the on-site auto mechanic and any other USTs found on-site (including the UST of unknown status associated with the former Gerald's Hardware Store) would be carried out in accordance with all applicable City, State, and federal requirements. The LAFD would be consulted prior to the removal of storage tanks to ensure that nearby sensitive receptors would not be adversely affected during the removal process and that any contaminated soil is properly handled and disposed of. Mitigation measures are provided below to ensure the safe removal of the existing UST and any additional USTs uncovered during the demolition process and remediation of contaminated soils. With implementation of Mitigation Measures E-1 through E-3, impacts related to storage tanks would be less than significant.

Polychlorinated Biphenyls

As discussed previously, PCBs may be present in any fluorescent light ballast discovered on-site and, although unlikely, in the pad-mounted transformer and hydraulic fluid used in the hydraulic lifts operated by the auto mechanic. Therefore, mitigation measures are provided below to ensure the safe removal of any identified PCBs. With implementation of Mitigation Measure E-4, impacts to PCBs would be less than significant.

Asbestos-Containing Materials

The possible occurrence of ACM in the resilient floor tile/mastic and roofing material at the project site does not necessarily require any type of remediation; however, any ACM would have to be handled properly in the event buildings or fixtures containing such materials were demolished or remodeled and certain maintenance activities would be advised if ACMs were left in place and the buildings reused. Because all on-site structures would be demolished under the Proposed Project, mitigation measures are provided below to ensure the safe removal of any identified ACMs. With implementation of Mitigation Measure E-5, impacts related to the presence and safe removal of any on-site ACMs would be less than significant.

Lead-Based Paint

As indicated previously, LBP materials were not sought on-site as the project site is not developed with residential uses. However, a previous LBP analysis identified lead levels below federal standards in the Re-Max portion of the on-site structures. If other sources of LBP are encountered on-site, LBP materials may require special handling and disposal as all on-site structures would be demolished under the Proposed Project. Therefore, mitigation measures are provided below to ensure the safe removal of any identified LBPs. With implementation of Mitigation Measure E-6, impacts related to potential on-site LBP would be less than significant.

Methane Gas

The project site is located within a City of Los Angeles Methane Buffer Zone. As described previously, methane gas is generated in the area by subterranean sources, including oil production facilities and resources located to the west along the coast. Methane can enter buildings through fissures or cracks in building foundations. Therefore, any future development would be required to comply with the seepage regulations contained in Division 71 of the Los Angeles Municipal Code, which mandates that methane detection systems and other mitigation be required in all new developments in all areas located in a Methane Zone or Methane Buffer Zone. Therefore, with compliance with Division 71 of the Los Angeles Municipal Code and implementation of Mitigation Measure E-7, impacts related to on-site methane contamination would be less than significant.

Proximity to a School

The project site is located within one-quarter mile of Loyola Village Elementary School. The school is located approximately 200 feet south of and hydraulically down gradient from the project site.

Groundwater in the vicinity of the project site trends southeast. Because of the location of the school relative to the project site, an accidental release of hazardous materials resulting in groundwater intrusion could impact Loyola Village Elementary School. However, the construction and operation of the Proposed Project will not include the heavy use, handling, or storage of large amounts of hazardous materials. Further, development of the Proposed Project would result in the complete development of the project site with large areas covered by impermeable surfaces. As such, any accidental release of hazardous materials from the Proposed Project would not likely result in groundwater intrusion that could reach the nearby elementary school. Therefore, it is considered unlikely that an accidental release of hazardous materials would impact Loyola Village Elementary School. Impacts would be less than significant.

Hazardous Materials Sites

On-Site

The only known source for potential soil contamination on-site is derived from the historic and the currently in-use storage tanks. In total, three USTs have been operated on-site. Based on a letter from the LAFD dated to September 1989, the UST associated with the former service station was removed, and based on the information provided to LAFD, no further action was required. As such, on-site soil contamination related to this UST is not known to have occurred.

The UST associated with the former Gerald's Hardware Store was listed on several UST databases; however, no additional information is provided regarding the construction, use, or current status of the UST and the Gerald's Hardware Store site. Therefore, it is considered possible that this UST is still located on-site. As such, Mitigation Measures E-1 through E-3 shall be implemented to assess any potential groundwater and soil contamination and ensure that in the event this UST is currently on-site, any necessary remedial activities shall take place prior to site demolition and construction of the Proposed Project.

The UST associated with the existing on-site auto mechanic is used for the storage of used motor oil associated with routine operation. There have been no reported leaks or spills related to this storage tank and this use is not listed on any database which reports spills, incidents, or releases. As previously discussed, laboratory analysis of soil samples collected during a 2001 Phase II subsurface assessment indicated no detectable levels of gasoline-related hydrocarbons (including BTEX or MTBE) in soils beneath the auto mechanic or adjacent to the in-use waste oil storage tank. The concentrations of metal on-site were within background levels. Also, relatively low concentrations of diesel range hydrocarbons were reported in three of the 12 soil samples ranging between below laboratory reporting limits to 17 parts per million, below the guidance levels set forth in the California LUFT Manual. However, prior to demolition and construction activities, Mitigation Measures E-1 through E-3 shall be implemented. With the implementation of the included mitigation measures, impacts related to possible on-site soil contamination would be less than significant.

Off-Site

As discussed above, three land uses in the vicinity of the project site were identified in a review of hazardous materials databases. The Airport Marina Hotel, AMFAC Hotel, and Furama Hotel (which formerly occupied a portion of the project site) are listed on the RCRA-TSD, FINDS, HAZNET, and RCRA-SQG databases. The waste category is listed as an "organic" small quantity generator with no reported releases or violations. In addition, in excess of 13 tons of ACMs waste was removed from the Furama Hotel. The hotel has subsequently been demolished with the exception of the hotel tower, which has completed extensive renovations while the remainder of the area exists as a construction site. Because the database identified waste material that no longer exists at the identified site, there is no potential for these materials to impact the project site or vicinity.

The Loyola Village Elementary School is listed on the FINDS database. However, no releases or contamination issues have been reported regarding this location. The Otis College of Art and Design is listed on the HAZNET and EMI databases. The waste category is listed as "photo-chemicals and photo-processing waste" with no releases, contamination issues, or violations reported. Because these two identified sites exist hydraulically down gradient from the project site, it is unlikely that any potential release of hazardous materials could impact the project site. Therefore, impacts would be less than significant.

Proximity to an Airport

The nearest airport to the project site is the Los Angeles International Airport, which is located approximately 0.5 miles to the south. The project site is not located within the boundaries of an airport land use plan and would not result in a safety hazard for people residing or working in the project area. The Proposed Project is also not located in the vicinity of a private airstrip. Therefore, no impact would occur.

Emergency Response Plan

The project site is located at the southeast corner of Manchester Avenue and Rayford Drive and approximately 0.07 miles west of Lincoln Boulevard, of which Manchester Avenue and Lincoln Boulevard are City-designated selected disaster routes that trend east-west and north-south, respectively.[4] In addition, according to the Safety Element of the General Plan of the City of Los Angeles, a Selected Emergency Facility identified as a City of Los Angeles Maintenance Warehouse is located approximately 0.37 miles southeast of the project site.[5] Despite its proximity to both selected disaster routes and the Selected Emergency Facility, the Proposed Project would not impede access to or from Manchester Avenue or Lincoln Boulevard, or interfere with operation at the nearby City Maintenance Warehouse. The construction and operation of the Proposed Project would not interfere with any other adopted

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[4] *City of Los Angeles City Planning Department, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles, September 1996.*

[5] *City of Los Angeles General Plan, Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles.*

emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant.

Wildland Fire

The project site is within the highly urbanized area of Westchester-Playa Del Rey and is not located within a City-designated Wildland Fire Hazard Area.[6] Thus, no impact with respect to wildland fires would occur.

CUMULATIVE IMPACTS

Development of the Proposed Project in combination with the 19 related projects has the potential to increase the use, storage, transport, and/or release of hazardous materials. However, Mitigation Measures E-1 through E-7 would reduce the potential impacts associated with the Proposed Project to a less than significant level. With respect to the related projects, each of the related projects would require evaluation for potential threats, including those associated with the release of hazardous materials into the environment, or from exposure to a health hazard, in excess of regulatory standards, exposure of hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school, or the location of a listed hazardous materials site. Because hazardous materials and risk of upset conditions are largely site-specific, this would occur for each individual project affected, in conjunction with development proposals on these properties. Further, local municipalities are required to follow local, State, and federal laws regarding hazardous materials and other hazards. Therefore, with compliance with local, State, and federal laws pertaining to hazards and hazardous materials, cumulatively considerable impacts would be reduced to a less than significant level.

MITIGATION MEASURES

E-1. For USTs currently in use and any found to be present on-site, a qualified UST consultant shall decommission the UST in compliance with the LAFD and other applicable state agencies.

E-2. Prior to construction, further investigation is required to assess the potential for subsurface groundwater and soil contaminants in the vicinity of the former Gerald's Hardware Store on-site. If contaminated soils are found to be present, a qualified abatement consultant shall abate the soils in compliance with the Department of Building and Safety and other applicable State regulations.

E-3. Prior to the issuance of a building permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified abatement consultant that no contaminated soils are present on-site. If contaminated soils are found to be present, a

[6] *City of Los Angeles City Planning Department, Environmental and Public Facilities Maps, Selected Wildland Fire Hazard Areas, September 1996.*

qualified abatement consultant shall abate the soils in compliance with the Department of Building and Safety and other applicable State regulations.

E-4. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified PCB abatement consultant that no PCBs are present on-site. If PCBs are found to be present, a qualified abatement consultant shall abate the site in compliance with the applicable City, State, and federal rules and regulations.

E-5. All suspect ACMs known to be on-site, as well as any suspect ACMs discovered during future construction activities at the site, shall be sampled and analyzed for asbestos content prior to any disturbance. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If additional ACMs are found to be present, a qualified asbestos abatement consultant shall abate the buildings in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other State and federal rules and regulations.

E-6. A LBP survey shall be conducted to determine the existence of any LBP on-site. Any contractor who would disturb lead containing surfaces shall be notified of the hazard and their requirement to comply with the applicable City, State, and federal regulations. Any additional LBP identified shall be abated by a qualified abatement consultant in accordance with all applicable City, State, and federal regulations.

E-7. Because the project site is located in a City-designated Methane Buffer Zone, the applicant shall be required to comply with Division 71 of the Los Angeles Municipal Code detailing the inclusion of a methane mitigation system.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of mitigation measures, impacts related to hazards and hazardous materials would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
F. HYDROLOGY AND WATER QUALITY

INTRODUCTION

This section evaluates the potential impacts related to hydrology and water quality resulting from the development of the Proposed Project. The following section includes the findings and conclusions presented in a hydrology study prepared by PSOMAS, October 1, 2009. The background data from the hydrology report is included as Appendix F to this Draft EIR. Additional information regarding the project site is provided in the Phase I Environmental Site Assessment prepared by EMG, December 1, 2006. This report is included as Appendix E to this Draft EIR.

ENVIRONMENTAL SETTING

Project Site

The project site consists of an irregularly shaped area of land consisting of approximately 3.03 acres at the southeast corner of the intersection of Manchester Avenue and Rayford Drive. The western portion of the project site is currently developed with approximately 24,000 square feet of commercial development plus an associated paved surface parking lot. The eastern portion of the project site is currently vacant; however, this portion of the project site has been previously analyzed. As discussed in Section II. Introduction/Summary, City Council adopted an MND for the Playa del Oro project in 2004, and as such, the baseline conditions have been adjusted to assume that the approved Playa del Oro project already exists on the eastern portion of the project site. Thus, for purposes of this hydrologic analysis, the eastern portion of the project site is treated as an existing building with impervious surfaces. The existing utilities in the area include a water delivery system, a gas distribution system, an electric service system, a sanitary sewer system, a storm drainage system, and a telephone/fiber optic system. There are also production domestic water wells within the study area.

Topography

The topography of the project site and surrounding area is differentiated. The project site generally slopes downward to the southeast. However, the eastern portion of the project site slopes downward to the east along its Manchester Avenue frontage. The natural slope of Manchester Boulevard ranges from approximately 165 mean sea level (msl) at the corner of Rayford Drive and decreases to approximately 144 msl. Furthermore, the natural slope of Rayford Drive ranges from approximately 165 msl and decreases to approximately 148 msl at the southern end of the project site (see Figure IV.F-1).

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

NORTH

0 25 50 75 100
Feet

Figure IV.F-1
Topography of the Project Site and Surrounding Area

Soil Conditions

The project site is located within the Los Angeles Coastal Plan. According to the California Department of Conservation, the project site is designated "Urban and Built-Up Land."[1] The "Urban and Built-Up Land" designation is determined by the density of development in a given area. The project site is reported to be underlain by quaternary deposits, specifically old eolian deposits of the Pleistocene Epoch.[2]

Surface Water Hydrology

The project site is located outside of the watershed of any major watercourse in the area. There are no lakes, rivers, or streams that flow within, through, or near the project site. Further, no ephemeral ponds exist on the project site. The nearest body of water to the project site is the Ballona Wetlands, located approximately 0.6 miles northwest of the project site, the Ballona Creek, located approximately 1.2 miles northwest of the project site, and the Pacific Ocean, located approximately 1.6 miles west of the project site. Due to the topography of the area, stormwater runoff generated in the study area drains in multiple directions as concentrated flow and as overland flow. The concentrated flow generally occurs within the lower elevations, while the overland flow from the sub-basins cascades down the respective low points. At each low point, the stormwater either enters a drainage system or is further conveyed through downstream sub-basins to the east and southeast.

The western portion of the project site is currently developed with three commercial structures and an associated paved surface parking lot. Except for intermittent areas of landscaping, most of this portion of the project site is covered with impermeable surfaces. As previously discussed, the eastern portion of the project site is treated as being covered with impervious surfaces for purposes of this hydrologic analysis.

The project site currently drains into existing storm drains that discharge into the municipal storm drains near the intersection of Manchester Avenue and Lincoln Boulevard. At this location, the storm drain system is comprised of two catch basins, which are connected to a 21-inch diameter lateral. Subsequently, this lateral connects to a 36-inch diameter storm drain mainline to the east beneath Manchester Avenue. The existing storm drains transport on-site and off-site runoff to the municipal storm drain system and eventually into the Pacific Ocean or the Ballona Creek.

Tsunamis, Seiches, and Flooding

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) program, the project site is located in Zone X. Zone X is defined as areas outside of the 0.2 percent

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[1] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Important Farmland in California, 2004, map.*

[2] *State of California Department of Conservation, Geological Survey, Geologic Map of the Long Beach 30'X60' Quadrangle, California, map, website: ftp://ftp.consrv.ca.gov/pub/dmg/rgmp/Prelim_geo_pdf/lb_geol-dem.pdf, accessed October 30, 2008.*

chance for annual flooding, or more commonly, outside of the 500-year flood hazard area. Further, the project site is not located in a 100- or 500-year floodplain as identified by the City of Los Angeles,[3] nor is it located within an identified inundation or tsunami hazard area.[4]

Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption and affect low-lying areas along a coastline. The project site is located approximately 1.6 miles east of the Pacific Ocean at an elevation of approximately 144 to 165 feet above sea level.

Seiches are oscillations generated in enclosed bodies of water usually as a result of earthquake related ground shaking. A seiche wave has the potential to overflow the sides of a containing basin to inundate adjacent or downstream areas. There are no large bodies of water in the immediate vicinity of the project site. The closest bodies of water are the Ballona Wetlands, located approximately 0.6 miles northwest of the project site, the Ballona Creek, located approximately 1.2 miles northwest of the project site, and the Pacific Ocean, located approximately 1.6 miles west of the project site and all at a lower elevation than the project site.[5]

The 100-year and 500-year flood plains are defined as flooding that would result from a rainstorm with the probability of occurring once every 100 and 500 years respectively. According to the Safety Element of the General Plan of the City of Los Angeles, the project site is not located within a 100-year or 500-year flood hazard area as mapped on a Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) or other flood hazard delineation map.

Groundwater

The Los Angeles Water Quality Control Board region overlies 14 major regional groundwater basins as identified by the RWQCB's Basin Plan.[6] The Los Angeles Coastal Plain and the San Fernando Valley cover the majority of the City of Los Angeles. The Los Angeles Coastal Plain includes the Palos Verdes Hydrological Sub-Area, the West Coast Hydrological Sub-Area, the Santa Monica Hydrological Sub-Area, the Hollywood Hydrological Sub-Area, and the Central Hydrological Sub-Area. The San Fernando Valley Hydrological Area overlies the Bull Canyon Hydrological Sub-Area, the Sylmar Hydrological Sub

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[3] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, 100 Year & 500 Year Flood Plains in the City of Los Angeles, September 1, 1996.*

[4] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Inundation and Tsunami Hazard Areas in the City of Los Angeles, September 1, 1996.*

[5] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Significant Ecological Areas in the City of Los Angeles, September 1, 1996.*

[6] *Los Angeles Region Water Quality Control Board, Basin Plan, Page 1-20, Figure 1-9, Regional Groundwater Basins.*

Area, the Tujunga Hydrological Sub-Area, the Verdugo Hydrological Sub-Area, and the Eagle Rock Hydrological Sub-Area. The project site is located in the West Coast Hydrological Sub-Area within the Los Angeles Coastal Plain Hydrological Area within the Los Angeles-San Gabriel Valley Hydrological Unit.

The nearest groundwater well maintained by the County of Los Angeles Department of Public works is well number 1253G, located approximately 1.43 miles northwest of the project site. Because this well is located at an elevation approximately 138 feet below the project site, it is unlikely that it would share a similar ground water level. The next closest groundwater well with a similar elevation is groundwater well 1307F, located approximately 2.53 miles southeast of the project site. According to well measurement records kept by the County of Los Angeles, the highest water level at well 1307F was approximately 111.5 feet below ground surface (bgs).[7] Groundwater beneath the project site flows southwesterly.[8] However, it is possible that local subsurface conditions and/or the presence of perched groundwater may have an influence on the direction of groundwater flow.

Water Quality Regulatory Framework

Clean Water Act

The 1987 amendments to the Federal Water Pollution Control Act, commonly referred to as the Clean Water Act (CWA), added Section 402(p), which establishes a framework for regulating municipal and industrial storm water discharges under the National Pollutant Discharge Elimination System (NPDES) program. As of 1991, all municipal and industrial stormwater runoff is also regulated under the NPDES system. Although the CWA has established 126 "priority contaminants (metals and organic chemicals)," the California Ocean Plan has established effluent limitation for 21 of these pollutants. The US Environment Protection Agency (EPA) is the primary Federal agency responsible for implementing the CWA. Subsequently, the EPA published final regulations that established requirements for applications for stormwater permits for specific categories of industries and construction activities of five acres or more and between one and five acres.

The California State Water Resources Control Board (SWRCB) and its regional water board, the Los Angeles Regional Water Quality Control Board (RWQCB), is the primary State agency responsible for implementing the CWA and the State's Porter-Cologne Water Quality Act within State waters. The RWQCB is also responsible for water quality regulation through its work in preparing and adopting the California Ocean Plan. Local agencies also have responsibility for managing wastewater discharges. All are required to meet criteria set forth in their NPDES permits, to monitor their discharges, and to submit monthly reports to the RWQCB and the EPA. In addition to infrastructure deficiencies, the increasing

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[7] *County of Los Angeles Department of Public Works, Groundwater Wells Website, website: http://dpw.lacounty.gov/wrd/wellinfo/well.cfm, accessed April 22, 2008.*

[8] *Phase I Environmental Site Assessment of Playa Del Oro Parcel 5, prepared by EMG, December 1, 2006.*

volume of stormwater runoff has become the major source of pollutants discharging into the Los Angeles River.

General Construction Activity Stormwater Permit

In 2003, the SWRCB adopted the General Construction Activity Stormwater Permit (GCASP), which is "…required for all storm water discharges associated with construction activity where clearing, grading, and excavation results in a land disturbance of one or more acres." Projects that meet these criteria must obtain a permit from the SWRCB prior to the start of construction. In order to be covered under the General Permit, the project applicant must submit a Notice of Intent (NOI) to the SWRCB.

The General Permit requires all owners (dischargers) of land where construction activities occur to:

- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation;
- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contaminating stormwater with the intent of keeping all products of erosion from moving off-site into receiving waters; and
- Perform inspections of stormwater pollution prevention measures (control practices).

The General Permit authorizes the discharge of stormwater associated with construction activity from construction sites. However, it prohibits the discharge of materials other than stormwater and all discharges which contain hazardous substances in excess of reportable quantities, established at 40 Code of Federal Regulations 117.3 or CFR 302.4, unless a separate NPDES permit has been issued to regulate those discharges.

The General Permit requires development and implementation of a SWPPP, emphasizing BMPs, which are defined as "schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States." The SWPPP has two major objectives:

- To help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and
- To describe and ensure the implementation of practices to reduce sediment and other pollutants in stormwater discharges, both during and after construction.

In addition, dischargers are required to conduct inspections before and after storm events and to certify annually that they were in compliance with the General Permit.

Phase II of the NPDES stormwater program covers small construction activities disturbing between one and five acres. Phase II became final and published in the Federal Register on December 8, 1999 with small construction permit applications due by March 10, 2003. The Phase II Final Rule also expanded the existing NPDES regulations (Phase I) to address stormwater discharges from municipal separate sewer systems (MS4) serving populations of less than 100,000 persons.

Standard Urban Stormwater Mitigation Plan

The Standard Urban Stormwater Mitigation Plan (SUSMP), approved by the RWQCB for the Los Angeles Region on March 8, 2000, was developed as part of the municipal stormwater program to address stormwater pollution from new development and redevelopment by the private sector. The SUSMP contains a list of the minimum required BMPs that must be used for a designated project. Additional BMPs may be required by ordinance or code adopted by the Permittee and applied generally or on a case-by case basis. Developers must incorporate appropriate SUSMP requirements into their project plans. As the permittee, the City of Los Angeles Planning Department will review the plan for proposed development within the project site as part of the development plan approval process and prior to issuance of building and grading permits.

The SUSMP is designed to eliminate 85 percent of the pollutants in stormwater runoff from new developments via requirements for implementation of a "first flush" cleansing program. The requirements of the program are such that the first 0.75 inches of rainfall runoff from a 24-hour storm is to be intercepted from drainage areas where new development is occurring and be cleansed, filtered or retained until pollutants are removed.[9]

Stormwater Quality

Stormwater quality is a significant concern in California. The project site is not located within the watershed of any major downstream water course. On-site stormwater quality systems include floor drains connected to a clarifier and an underground waste-oil storage tank beneath the auto mechanic property.[10]

This section discusses typical pollutants found in stormwater runoff and discusses the types of contaminants that may be found in existing stormwater runoff from the project site. Under Section 303(d) of the 1972 Clean Water Act, areas are required to declare a list of water quality limited segments. Watercourses included on this list do not meet water quality standards, even after installing the minimum level of pollutant control technology on point sources, and must develop action plans, known as Total Maximum Daily Loads (TMDLs) to improve water quality. The RWQCB indicates that certain pollutants

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[9] *Standard Urban Storm Water Mitigation Plan for Los Angeles County and Cities in Los Angeles County, March 8, 2000, page 10.*

[10] *Phase I Environmental Site Assessment of Playa Del Oro – Parcel 5, prepared by EMG, December 1, 2006.*

in watersheds may include ammonia, nutrients, algae, odors, and unnatural scum/foam, both coming from point and non-point sources. Receiving waters can assimilate a limited quantity of various constituent elements; however, there are thresholds beyond which the measured amount becomes a pollutant and results in an undesirable impact.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Proposed Project could have a potentially significant impact upon hydrology and water quality if it were to:

(a) Violate any water quality standards or waste discharge requirements;

(b) 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);

(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 a manner which would result in flooding on- or off-site;

(e) Create of 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 hazard area as mapped on a federal Flood Hazard Boundary or Flood insurance Rate Map or other flood hazard delineation map;

(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows;

(i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or

(j) Inundation by seiche, tsunami, or mudflow.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination shall be made on a case-by-case basis whether the project would:

(a) Cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources;

(b) Substantially reduce or increase the amount of surface water in a water body;

(c) Result in a permanent, adverse change to the movement or surface water sufficient to produce a substantial change in the current or direction of water flow;

(d) A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit of Water Quality Control Plan for the receiving water body;

(e) Change potable water levels sufficiently to:

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

(f) Result in demonstrable and sustained reduction of groundwater recharge capacity;

(g) Affect the rate or change the direction of movement of existing contaminants;

(h) Expand the area affected by contaminants;

(i) Result in an increased level of groundwater contamination (including that from direction percolation, injection or salt water intrusion); or

(j) Cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations (CCR), Title 22, Division 4, and Chapter 15 and the Safe Drinking Water Act.

Project Impacts

Surface Water Hydrology

The project site currently drains into existing storm drains that discharge into the municipal storm drains near the intersection of Manchester Avenue and Lincoln Boulevard. As previously discussed, at this location the storm drain system is comprised of two catch basins, which are connected to a 21-inch diameter lateral. Subsequently, this lateral connects to a 36-inch diameter storm drain mainline to the east beneath Manchester Avenue. The runoff from the project site would discharge into the existing municipal storm drain system, in a manner consistent with applicable NPDES stormwater permits and would be required to obtain a water quality permit from the RWQCB. The NPDES program established a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. The reduction of pollutants in urban stormwater discharge to the maximum extent practicable through the use of structural and nonstructural BMPs is one of the primary objectives of the water quality regulations. Per the SUSMP, the Proposed Project would include the following BMPs: installation of oil and grease separators at storm drain inlets, the cleaning of parking lots on a regular basis, and incorporation of peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping to manage runoff water.

The project site is located in a highly urbanized area and no stream or river courses are located in the project vicinity. There are no natural watercourses on the project site nor does it drain toward a natural watercourse. As previously discussed, for purposes of this hydrologic analysis, the project site is predominantly covered with impermeable surfaces as well as small areas of permeable surfaces. The Proposed Project would involve the construction of a mixed-use development with approximately 85 to 90 percent imperviousness. Stormwater runoff rates for existing and proposed conditions were calculated utilizing methodology detailed in the Los Angeles County Department of Public Works (LACDPW) Hydrology Manual. The project site was divided into two sub-areas with runoff flows calculated for each sub-area. Sub-area 1A includes the northern 1.80 acres of the project site, while sub-area 2B includes the southern 1.83 acres of the project site (see Figure IV.F-2).[11]

Capacities of the existing drainage facilities in the project area were analyzed given a 10-year, 25-year, and 50-year storm frequency. A 24-hour duration was assumed for each of these storm frequencies. Under these conditions, the project site accumulates 3.6 inches, 4.4 inches, and 5.0 inches of water in the 10-year, 25-year, and 50-year storm frequencies, respectively. With development of the Proposed Project, runoff from sub-area 1A will be collected and routed through the project site to the north toward Manchester Avenue via roof drains; runoff from sub-area 2B will discharge into the existing storm drain system within the Playa del Oro development, which drains to Lincoln Boulevard. Stormwater flow rates for the two sub-areas as well as the flow rate at their convergence were calculated. The total peak

[11] *The area analyzed for runoff flows goes outside of the project site boundary, thereby exceeding the project site area of 3.03 acres.*

stormwater discharge at the downstream outlet tributary to both sub-areas is approximately five cubic feet per second (cfs) for both the existing and the proposed condition during the 10-year storm event, seven cfs for both conditions during the 25-year storm event, and eight cfs for both conditions during the 50-year storm event (see Tables IV.F-1 through IV.F-3). As runoff levels resulting from buildout of the Proposed Project are anticipated to be the same as under existing conditions, detention basins will not be required. As such, the existing municipal storm drain system will be able to accommodate the flows generated under the Proposed Project. Therefore, impacts to existing storm drain system capacity resulting from buildout of the Proposed Project would be less than significant.

The drainage pattern would be designed to connect to the existing stormwater infrastructure. Appropriate debris filters would be installed at strategic locations in accordance with the SWPPP, which is a mandatory requirement under the NPDES permitting process. The western portion of the project site is currently completely developed and primarily covered with impervious surfaces; the eastern portion of the project site is also considered completely developed for purposes of this analysis. Therefore, upon project buildout, potential erosion of the project site would be roughly the same as under current conditions because new development under the Proposed Project would also cover the project site with primarily impervious surfaces. Thus, development of the project site would not result in significant impacts related to surface water runoff.

Table IV.F-1
10-Year Storm Event Runoff Summary

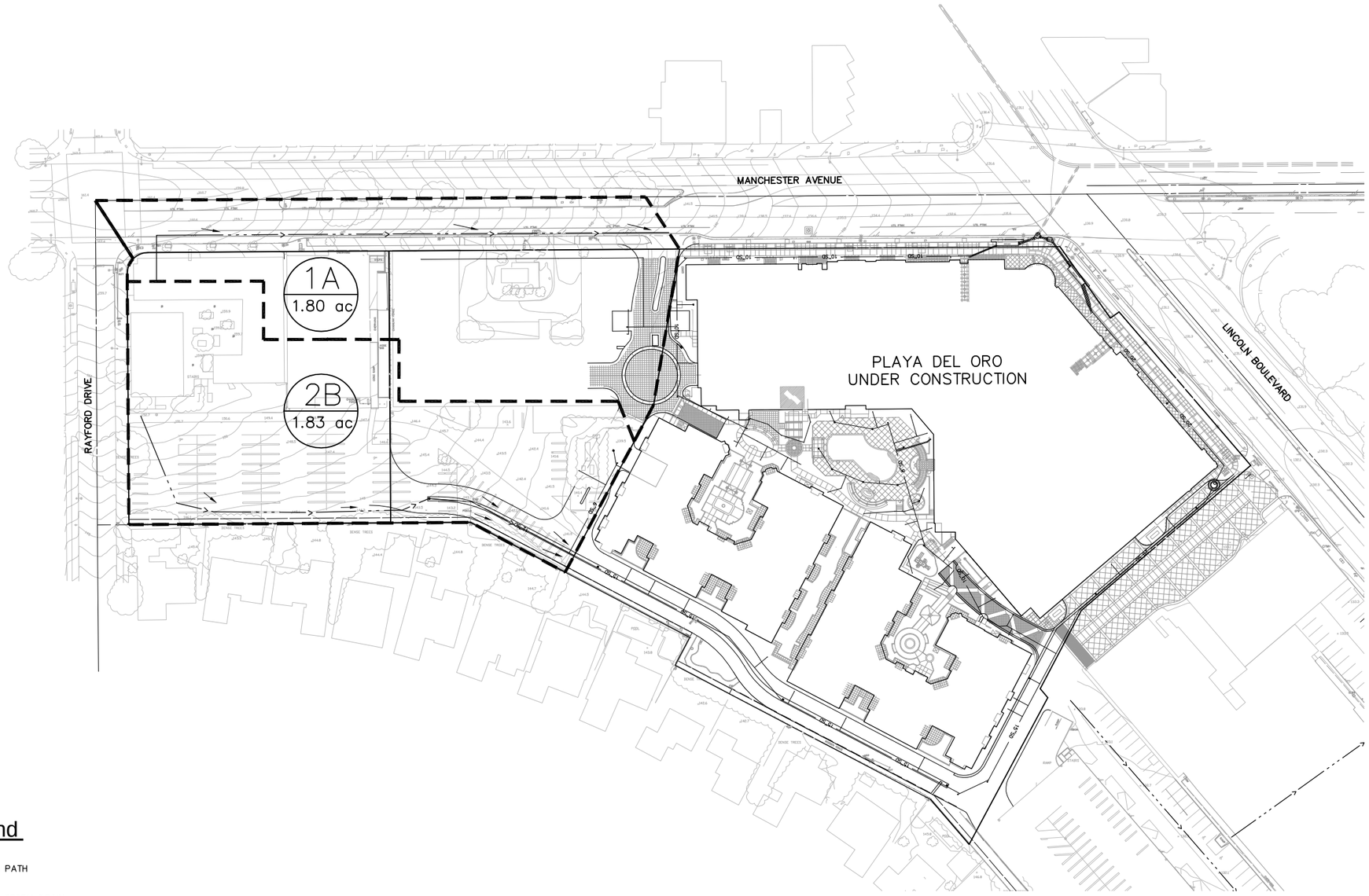
Sub-Area	Existing	Proposed	Change in Runoff Amount
1A	3 cfs	3 cfs	--
2B	3 cfs	3 cfs	--
Routed Total	5 cfs	5 cfs	--

Source: PSOMAS, Environmental Impact Report Site Hydrology for Playa Manchester, October 1, 2009, Section 1.5.

Table IV.F-2
25-Year Storm Event Runoff Summary

Sub-Area	Existing	Proposed	Change in Runoff Amount
1A	4 cfs	4 cfs	--
2B	4 cfs	4 cfs	--
Routed Total	7 cfs	7 cfs	--

Source: PSOMAS, Environmental Impact Report Site Hydrology for Playa Manchester, October 1, 2009, Section 1.5.



Legend

TC FLOW PATH

EXISTING STORM DRAIN

HYDROLOGY DRAINAGE SUB–AREA BOUNDARY

1A / 1.80 ac — SUB–AREA DESIGNATION AND ACREAGE

NORTH

0 40 80 120 160
Feet

Source: PSOMAS, 08/08/08.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.F-2
Hydrological Sub-Areas at the Project Site

Table IV.F-3
50-Year Storm Event Runoff Summary

Sub-Area	Existing	Proposed	Change in Runoff Amount
1A	5 cfs	5 cfs	--
2B	5 cfs	5 cfs	--
Routed Total	8 cfs	8 cfs	--

Source: PSOMAS, Environmental Impact Report Site Hydrology for Playa Manchester, October 1, 2009, Section 1.5.

Tsunamis, Seiches, and Flooding

Tsunamis are seismically induced tidal phenomena. The project site would not be susceptible to tsunamis due to its location at approximately 1.6 miles east of the Pacific Ocean and its relatively high elevation of approximately 153 feet above sea level as compared to the surrounding properties. Therefore, the project site would not be susceptible to tsunamis.

Seiches are also seismically induced tidal phenomena. The project site is located at a relatively higher elevation than much of the surrounding area. Specifically, the elevation at project site ranges between approximately 144 and 165 feet above sea level. There are no large bodies of water in the immediate vicinity of the project site. The closest body of water is the Ballona Creek and Ballona Wetlands, which is located approximately 0.6 miles northwest of the project site and at a lower elevation than the project site.[12] Therefore, the project site would not be susceptible to seiches.

According to the Safety Element of the General Plan of the City of Los Angeles, the project site is not located within a 100-year or 500-year flood hazard area as mapped on a FEMA FIRM or other flood hazard delineation map.[13] Therefore, the future development of the project site would not result in or expose people or structures to flooding resulting from the failure of a levee or dam. Impacts related to seismic induced tidal phenomena and flooding would be less than significant.

Groundwater

The groundwater table at the nearby groundwater well number 1307F was measured at approximately 111.5 feet bgs. Groundwater to the north of the project site is anticipated to flow northerly toward the Ballona Creek while groundwater to the south flows in a southerly and southeasterly direction toward topographically lower elevations and eventually discharges into the Pacific Ocean. Groundwater conditions in the future may vary substantially as a result of seasonal variations of rainfall and future site

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[12] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Significant Ecological Areas in the City of Los Angeles, September 1, 1996.*

[13] *General Plan of the City of Los Angeles, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, Adopted November 26, 1996.*

development. The development of the project site includes excavation down to between approximately 12 and 24 feet bgs for the proposed enclosed parking levels. Despite any potential change in groundwater level due to seasonal variation in rainfall or future site development, it is unlikely that project excavation would reach the existing water table. Because excavation activities would terminate above the likely groundwater table, excavation activities would not result in the alteration of groundwater flows beneath the project site. As such, the Proposed Project would not result in significant impacts related to the availability of groundwater and would not result in the alteration of groundwater flows. Therefore, impacts would be less than significant.

Water Quality

Construction-Related Impacts

Three general sources of short-term construction-related stormwater pollution associated with the project site are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment; and 3) the maintenance and operation of construction equipment.

Construction Materials

The project site would contain a variety of construction materials that are potential sources of stormwater pollution. Categories of such materials include: adhesives, cleaning agents, landscaping, plumbing, painting, heating/cooling, and masonry materials, floor and wall coverings, and construction debris. Construction material spills can be a source of stormwater pollution and/or soil contamination, which could generate a potentially significant impact to water quality.

Since the project site involves clearing, grading, and the excavation of 3.03 acres of land, a General Construction Activity Stormwater Permit must be obtained from the SWRCB prior to the start of construction. The NPDES requires that an NOI be filed with the SWRCB. By filling an NOI, the developer agrees to the conditions outlined in the General Permit. One of the conditions of the General Permit is the development and implementation of a SWPPP. The SWPPP identifies which structural and non-structural BMPs will be implemented, such as sandbag barriers, temporary desilting basins near inlets, gravel driveways, dust controls, employee training, and general good housekeeping practices.

Specifically, the following SWPPP BMPs are required to prevent construction debris from entering the municipal storm drain system:

- During construction and operation, all waste shall be disposed of in accordance with all applicable laws and regulations. Properly labeled recycling bins shall be utilized for recyclable construction materials including solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials and wastes must be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed, regulated disposal site by a licensed waste hauler.

- All leaks, drips, and spills occurring during construction shall be cleaned up promptly and in compliance with all applicable laws and regulations to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

- If materials spills occur, they should not be hosed down. Dry cleaning methods shall be employed whenever possible.

- Construction dumpsters shall be covered with tarps or plastic sheeting if left uncovered for extended periods. All dumpsters shall be well maintained.

- The project applicant/developer shall conduct street sweeping and truck wheel cleaning to prevent dirt in stormwater.

- The project owner/developer shall provide regular sweeping of private streets and parking lots within the project site with equipment designed for removal of hydrocarbon compounds.

With implementation of the required BMPs and the mitigation measures listed below, short-term impacts on water quality from construction materials would be less than significant.

Site Grading

Soil erosion is the process by which soil particles are removed from the land surface by wind, water, and/or gravity. Soil particles removed by stormwater runoff are considered pollutants that if discharged to the municipal storm drain system eventually reach the Pacific Ocean and can have negative impacts upon aquatic habitats. Grading activities can greatly increase erosion processes, which would generate a potentially significant impact to water quality.

However, the following SWPPP BMPs are required to prevent construction silt from entering the municipal storm drain system:

- The amount of exposed soils shall be limited and erosion control procedures implemented for those areas that must be exposed.

- Grading activities shall be phased so that graded areas are landscaped or otherwise covered, as quickly as possible after completion of activities.

- Appropriate dust suppression techniques, such as watering or tarping shall be used in areas that must be exposed.

- The area shall be secured to control off-site migration of pollutants.

- Construction entrances shall be designed to facilitate removal of debris from vehicles exiting the site, by passive means such as paved/graveled roadbeds, and/or by active means such as truck washing facilities.

- Truck loads shall be tarped.
- Roadways shall be swept or washed down to prevent generation of fugitive dist by local vehicular traffic.
- Simple sediment filters shall be constructed at or near the entrances to the municipal storm drain system wherever feasible.

With implementation of the required BMPs, and the mitigation measures listed below, short-term impacts on water quality from site grading would be less than significant.

Equipment Maintenance

Poorly maintained vehicles and heavy equipment that leak fuel, oil antifreeze, or other fluids on the construction site are also common sources of stormwater pollution and soil contamination which would generate a potentially significant impact to water quality.

However, the following SWPPP BMPs are required to prevent construction silt from entering the municipal storm drain system:

- All leaks, drips, and spills occurring during construction shall be cleaned up promptly and in compliance with all applicable laws and regulations to prevent contaminated soil on paved surfaces that can be washed away into the municipal storm drains.
- If materials spills occur, they should not be hosed down. Dry cleaning methods shall be employed whenever possible.
- The project applicant/developer shall conduct truck wheel cleaning and truck washing to prevent dirt in stormwater.
- The project applicant/developer shall keep vehicles in good working order.

With the implementation of the required BMPs, short-term impacts on water quality from equipment maintenance would be less than significant.

Long-Term Operation Impacts

If not properly designed and constructed, the proposed development could increase the rate of urban pollutant introduction into the municipal storm drain system. In order to prevent these potential impacts, the Proposed 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 RWQCB, which regulates the issuance of waste discharge requirements to Los Angeles County; 3) the County of Los Angeles SUSMP; and 4) the City of Los Angeles Municipal Code (LAMC).

In compliance with the SUSMP requirements, the proposed development would provide for the treatment/filtration of on-site stormwater runoff before it enters the public stormwater conveyance system, in order to minimize the introduction of pollutants of concern. As required by SUSMP, this system must remove 85 percent of such "first flush" stormwater pollutants such as hydrocarbon compounds (i.e., automotive oils, lubricants, and other fluids) deposited, as a matter of course, along the project site's streets and driveways. Applicable BMPs would also be selected from those approved sources identified in the SUSMP for Los Angeles County and City of Los Angeles. Additionally, a preventive maintenance program, including regular street and parking lot sweeping with equipment designed for removal of such compounds, shall be provided by the project owner/developer, to reduce the potential water quality impacts to a less than significant level. Other aspects of the SUSMP with which the project site must comply include provisions for the proper design of outdoor material and trash storage areas.

As noted above, the project site would provide structural or treatment control BMPs designed to control stormwater runoff contamination. While some infiltration through landscaped areas would occur, the project site would primarily rely on the implementation of Treatment Control BMPs to control stormwater runoff contamination. As required by the SUSMP, detailed plans for the project site's compliance with the SUSMP would be submitted to the City as part of the development plan approval process prior to issuance of building and grading permits. Detailed plans would include the location of oil and grease separators at storm drain inlets, and the location of infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping. With compliance with the SUSMP requirements, the Proposed Project's operational impacts on stormwater quality would be less than significant.

The project site would be required to comply with the City's Urban Runoff Ordinance, which outlines practices for all developments in the City and runoff control requirements for all new development. Good housekeeping practices include: 1) collection, storage, and minimization of urban runoff; 2) maintenance of equipment; 3) removal of debris; and 4) prohibition of the use of any pesticides and fungicides that are banned by the US Environmental Protection Agency. As part of the runoff control requirements for new developments, all new developments in the City must prepare an Urban Runoff Mitigation Plan that must address one or more of the following goals: 1) maximization of permeable areas for infiltration of runoff; 2) maximization of the amount of runoff directed toward permeable areas or stored for reuse; and 3) removal of pollutants through installation of treatment control BMPs, Compliance with the City's Urban Runoff Ordinance would ensure that the Proposed Project does not adversely affect off-site water quality. Furthermore, with implementation of the mitigation measures listed below, impacts on water quality would be reduced to a level of less than significant.

CUMULATIVE IMPACTS

Development of the Proposed Project in conjunction with the related projects listed in Section II, Environmental Setting, could impact storm drainage and water quality in the area. The Proposed Project is located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from this

built-out environment. When new construction occurs here, it generally does not lead to substantial additional runoff, since new developments would also be required to control the amount and quality of stormwater runoff coming from their respective sites. Thus, the Proposed Project would not contribute to a significant cumulative impact in the event that any off-site areas served by local storm drains were to increase peak flows to the system and no cumulatively considerable impacts to water runoff and water quality would occur.

MITIGATION MEASURES

As impacts related to surface water runoff and water quality would be less than significant, no mitigation measures are required. However, the City requires implementation of the following standard measures to ensure the mitigation of the less-than-significant impacts.

Short-Term Construction Impacts

F-1. All earthwork on the project site shall be performed in accordance with the requirements of the City of Los Angeles Department of Building and Safety, the City of Los Angeles Civil Engineer of Record, and the Storm Water Pollution Prevention Program.

F-2. All waste shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

F-3. Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

F-4. Pavement at material spills shall not be hosed down. Dry cleanup methods shall be used whenever possible.

F-5. Waste containers shall be covered and maintained. Uncovered waste containers shall be stored under a roof or covered with tarps or plastic sheeting.

F-6. Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets.

F-7. All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.

Surface Water Runoff/Water Quality Impacts

F-8. Project applicant(s) are required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24 hour period. The design of

structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required. All structural or treatment control BMPs shall be maintained for the life of the project.

F-9. Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rates for developments where increased peak stormwater discharge rate will result in increased potential for downstream erosion.

F-10. Maximize trees and other vegetation at the site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.

F-11. Reduce impervious surface area by using impermeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers (i.e., turf block); and granular materials (i.e., crushed aggregates, cobbles).

F-12. Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

F-13. Toxic wastes must be discarded at a licensed regulated disposal site. Waste containers must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and water tight waste containers with lids. Drip pans or absorbent materials shall be used whenever grease containers are emptied. Containers shall be washed in an area with a properly connected sanitary sewer.

F-14. Reduce the use of hazardous materials and waste by: using detergent-based or water-based cleaning systems; and avoid chlorinated compounds, petroleum distillates, phenols, and formaldehyde.

F-15. Utilize natural drainage systems to the maximum extent practicable.

F-16. Control or reduce or eliminate flow to natural drainage systems to the maximum extent practicable.

F-17. Protect slopes and channels and reduce run-off velocities by complying with Chapter IX, Division 70 of the Los Angeles Municipal Code and utilizing vegetation (grass, shrubs, vines, ground covers, and trees) to provide long-term stabilization of soil.

F-18. All storm drains inlets and catch basins within the project area must be stenciled with prohibitive language (such as “NO DUMPING – DRAINS TO OCEAN”) and/or graphical icons to discourage illegal dumping. Signs and prohibitive language and/or graphical icons prohibiting illegal dumping must be posted at public access points along

channels and creeks within the project area. The legibility of any stencils and/or signs must be maintained.

F-19. Materials with the potential to contaminate stormwater must be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.

F-20. The hazardous materials storage area must be paved and sufficiently impervious to contain leaks and spills.

F-21. The hazardous materials storage area must have a roof or awning to minimize collection of stormwater within the secondary containment area.

F-22. The owner of the property shall prepare and execute covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

F-23. Incorporate appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Protect outlets of culverts, conduits, or channels from erosion by discharge velocities by installing a rock outlet protection. Install sediment traps below the pipe-outlet. Inspect, repair, and maintain the outlet protection after each significant rain.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to hydrology and water quality would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
G. LAND USE AND PLANNING

INTRODUCTION

This section evaluates the Proposed Project's potential land use impacts based upon compatibility with surrounding land uses and consistency with applicable land use policies of the agency with jurisdiction over the project site. In addition, the potential cumulative land use impacts of the Proposed Project in combination with the related projects are evaluated in this section.

ENVIRONMENTAL SETTING

Existing On-Site Land Uses

The 3.03-acre project site is located in the Westchester-Playa del Rey Community Plan area (Community Plan) of the City of Los Angeles. The project site is bound by Manchester Avenue to the north, the Playa del Oro mixed-use development under construction to the east, single-family residences to the south, and Rayford Drive to the west (see Figure II-1, Regional and Project Vicinity Map).

The project site is relatively flat. The western portion of the project site is currently developed with 24,000 square feet of retail uses, housed in three one-story structures, and a paved surface parking lot. Retail uses on-site include two real estate offices, a health food store/acupuncture office, a Pilates/yoga studio, a gift shop, a karate/martial art studio, an automotive service center, and an art supply store. Landscaping on the western portion of the project site includes ornamental brushes and trees. The eastern portion of the project site is currently vacant.[1] Photographs depicting land uses on the project site and the immediate surrounding area are provided in Section II, Environmental Setting.

The Proposed Project is located in a developed urban area. General land uses in the vicinity of the project site include residential, commercial, and retail uses, as well as recreational facilities and a school. The following describes the specific land uses in the vicinity of the project site.

Northeast of the project site, on the northwest corner of Manchester Avenue and Rayford Drive, are several multi-family residential uses. Directly north of the project site, across Manchester Avenue, is the Westchester Church of the Nazarene. East of the church, northeast of the project site, are several multi- and single-family residences as well as the Siam restaurant. East of the restaurant, on the northwest corner of Lincoln Boulevard and Manchester Avenue, is a vacant lot.

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[1] *In 2004, City Council adopted a Mitigated Negative Declaration ("MND") for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site (the eastern portion of the current project site), which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project. See section III. Project Description, for a description of the Proposed Project.*

East of, and directly adjacent to, the project site is the Playa del Oro mixed-use development currently under construction. Further east, across Lincoln Boulevard, is the Westchester Recreation Center.

Directly south of the project site, fronting Villanova Avenue, are several single-family residences. Further south, on the southeast corner of Villanova Avenue and Rayford Drive, is Loyola Village Elementary School.

Directly west of the project site, across Rayford Drive, is the Congregational Church of the Messiah. South of the church, southwest of the project site, are a vacant lot and several single-family residences. Photographs depicting surrounding land uses of the project site are provided in Section II, Environmental Setting.

Applicable Land Use Policies and Regulations

The project site is located in the Westchester-Playa del Rey community of the City of Los Angeles. As such, the project site is subject to the applicable policies and requirements of several local and regional plans. At the regional/subregional level, development within the project site is subject to the Southern California Association of Governments' (SCAG) Regional Comprehensive Plan and Guide (the "RCPG"), including the Final 2008 Regional Comprehensive Plan, the South Coast Air Quality Management District's (SCAQMD) 2007 Air Quality Management Plan (the "AQMP"), and the Los Angeles County Metropolitan Transportation Authority's (LACMTA) Congestion Management Plan for Los Angeles County (CMP). At the City level, development within the project site is subject to the City of Los Angeles General Plan (General Plan), the Westchester-Playa del Rey Community Plan (Community Plan), the Los Angeles Coastal Transportation Corridor (Specific Plan), the Loyola Village Community Design Overlay, and the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (the "Planning and Zoning Code"). An overview of each of these plans and regulations is provided below.

Regional Plans

2008 Regional Comprehensive Plan

The 2008 Regional Comprehensive Plan (RCP) was adopted 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. The RCP serves to guide decision-making with respect to the significant issues and changes, including growth management that can be anticipated by the year 2015 and beyond. SCAG prepared and issued the Final 2008 Regional Comprehensive Plan ("2008 RCP") in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to inter-related housing, traffic, water, air quality, and other regional challenges.[2]

[2] *Southern California Association of Governments Final 2008 Regional Comprehensive Plan, website: http://scag.ca.gov/rcp/index.htm, July 31, 2009.*

The 2008 RCP, adopted October 2, 2008, serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the interrelationships between natural resource sustainability, economic prosperity, and quality of life.[3] It includes input from each of the 14 subregions that make up the Southern California region comprising Los Angeles, Orange, San Bernardino, Riverside, Imperial, and Ventura Counties. The project site is located within the City of Los Angeles subregion, which encompasses the entire City of Los Angeles.

The 2008 RCP incorporates principles and goals of the Compass Blueprint Growth Vision, discussed below, and the Regional Transportation Plan. Impacts associated with air quality and regional mobility are discussed in Section IV.C, Air Quality and Section IV.K, Traffic, Transportation, and Parking, of this Draft EIR, respectively. The 2008 RCP includes nine chapters: Land Use and Housing; Open Space and Habitat; Water; Energy; Air Quality; Solid Waste; Transportation; Security and Emergency Preparedness; and Economy. Each chapter is organized into three sections: goals, outcomes, and action plans. Each action plan contains "Constrained Policies", which provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation A comprehensive review and consistency analysis for each of the 2008 RCP goals and policies is discussed under the "Project Impacts" subheading below.

South Coast Air Quality Management District

The project site is located within the South Coast Air Basin (SCAB) and is therefore within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The Air Quality Management Plan (AQMP) was adopted in 1997 (updated in 2007) by SCAQMD and SCAG to assist in fulfilling SCAQMD responsibilities, and is intended to establish a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the SCAB area. Air quality impacts of the Proposed Project and consistency of the Project with the AQMP are analyzed in greater detail in Section IV.C, Air Quality, of this Draft EIR.

Congestion Management Plan

Within Los Angeles County, the Metropolitan Transportation Authority (Metro) is the designated congestion management agency responsible for coordinating regional transportation policies. The Congestion Management Plan (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and, in addition, to propose transportation projects which are eligible to compete for State gas tax funds. In order to receive funds from Proposition 111 (i.e., State gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement

[3] *Southern California Association of Governments, The State of the Region 2007, website: http://scag.ca.gov/publications/index.htm, July 31, 2009.*

the requirements of the CMP. Within Los Angeles County, the Los Angeles County Metropolitan Transportation Authority (LACTMA) is the designated congestion management agency responsible for coordinating the County's adopted CMP. The Proposed Project's Traffic Impact Analysis, which is presented in greater detail in Section IV.K, Transportation, Traffic, and Parking of this Draft EIR, was prepared in accordance with the County of Los Angeles CMP and City of Los Angeles Department of Transportation (LADOT) guidelines.

Local Plans

City of Los Angeles General Plan

General Plan Framework

California State law (Governmental Code Section 65300) requires that each city prepare and adopt a comprehensive, long-term general plan for its future development. This general plan must contain seven elements, including land use, circulation, housing, conservation, open space, noise, and safety. In addition to these, State law permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions. California State law also requires that the day-to-day decisions of a City follow logically from and be consistent with the general plan. More specifically, Government Code Sections 65860, 66473.5, and 65647.4 require that zoning ordinances, subdivision, and parcel map approvals be consistent with the general plan.

The City of Los Angeles General Plan is a comprehensive, long-range declaration of purposes, policies, and programs for the development of the City of Los Angeles. The General Plan is a dynamic document consisting of eleven elements, which include ten 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 consists of the Community Plans for each of the City's 35 Community Planning Areas. The City of Los Angeles General Plan Framework Element (Framework), adopted December 1996 (re-adopted August 2001), provides general guidance on land use issues for the entire City.

The General Plan Framework Element responds to State and federal mandates to plan for the future. The City of Los Angeles uses population forecasts provided by SCAG to plan for long-term growth. The General Plan Framework Element sets forth a Citywide comprehensive long-range growth strategy. It defines Citywide policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. The General Plan Framework Element also contains policies that are intended to maintain the City of Los Angeles' cultural and natural diversity. The General Plan Framework Element provides guidelines for future updates of the City's community plans. It does not supersede the more detailed community and specific plans.

The Framework Element of the General Plan serves as a guide for the City's overall long-range growth and development policies. It contains Long Range Land Use Diagrams (Land Use Diagrams) for regions of the City, which designate land uses that are encouraged in each of these regions. In the Long Range

Land Use Diagram for the Westchester-Playa del Rey Community Planning Area, the project site is within an area designated as a Community Center.

According to Chapter 3 (Land Use) of the Framework, Community Centers are intended to serve as identifiable focal points and activity centers for surrounding groups of residential neighborhoods, serving a population of 25,000 to 100,000 people. Community Centers are expected to contain a diversity of uses including small offices, overnight accommodations, cultural and entertainment facilities, schools and libraries, as well as neighborhood-oriented uses. The scale and density of Community Centers are greater than in Neighborhood Districts with building heights generally ranging from two to six stories depending on the character of the surrounding area. Community Centers are served by small shuttles and local buses in addition to automobiles and may be located along transit streets. The mixing of uses in Community Centers offers increased opportunities for employees to live near their jobs and residents to live near shopping, thereby reducing the length and number of vehicle trips and increasing and encouraging pedestrian and bicycle activity.

The General Plan Framework offers several policies to reinforce and encourage new Community Centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work, and visit, both during the day and at night.

Westchester-Playa del Rey Community Plan

The Westchester-Playa del Rey Community Plan (Community Plan) is one of 35 Community Plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. Together, the Plans make up the Land Use Element of the City of Los Angeles General Plan. The Community Plans are intended to promote an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The Community Plans are also intended to guide development in order to create a healthful and pleasing environment. The Community Plans coordinate development among the various communities of the City of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community.

The Community Plan area is located in the western coastal portion of the City of Los Angeles and is generally bound by Centinela Avenue, La Brea Avenue, the unincorporated areas of Del Aire, Ladera Heights, Lennox, and Marina del Rey, the City of Inglewood, the City of El Segundo, Dockweiler State Beach, Ballona Creek, Bay Street, and Jefferson Boulevard. The Community Plan area is primarily characterized by low to low-medium density residential uses, with commercial uses concentrated near the transit corridors of Lincoln Boulevard, Sepulveda Boulevard, and Century Boulevard.

The overall purpose of the Community Plan is to maintain the character of the Westchester and Playa del Rey communities by:

- Enhancing the positive characteristics of residential neighborhoods while providing a variety of housing opportunities;

- Improving the function, design and economic vitality of commercial areas;
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance;
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts;
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base; and
- Improving the quality of the build environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community.

The project site is designated for "Community Commercial" use in the Community Plan, which corresponds to the C2, C4, CR, RAS3, and RAS4 zones (see Figure IV.G-1, Westchester-Playa del Rey Community Plan Land Use Designations). This land use designation provides for goods and services that appeal to both local and regional markets and includes such uses as restaurants, shopping centers, recreational facilities, hotels, and multi-family residential uses.

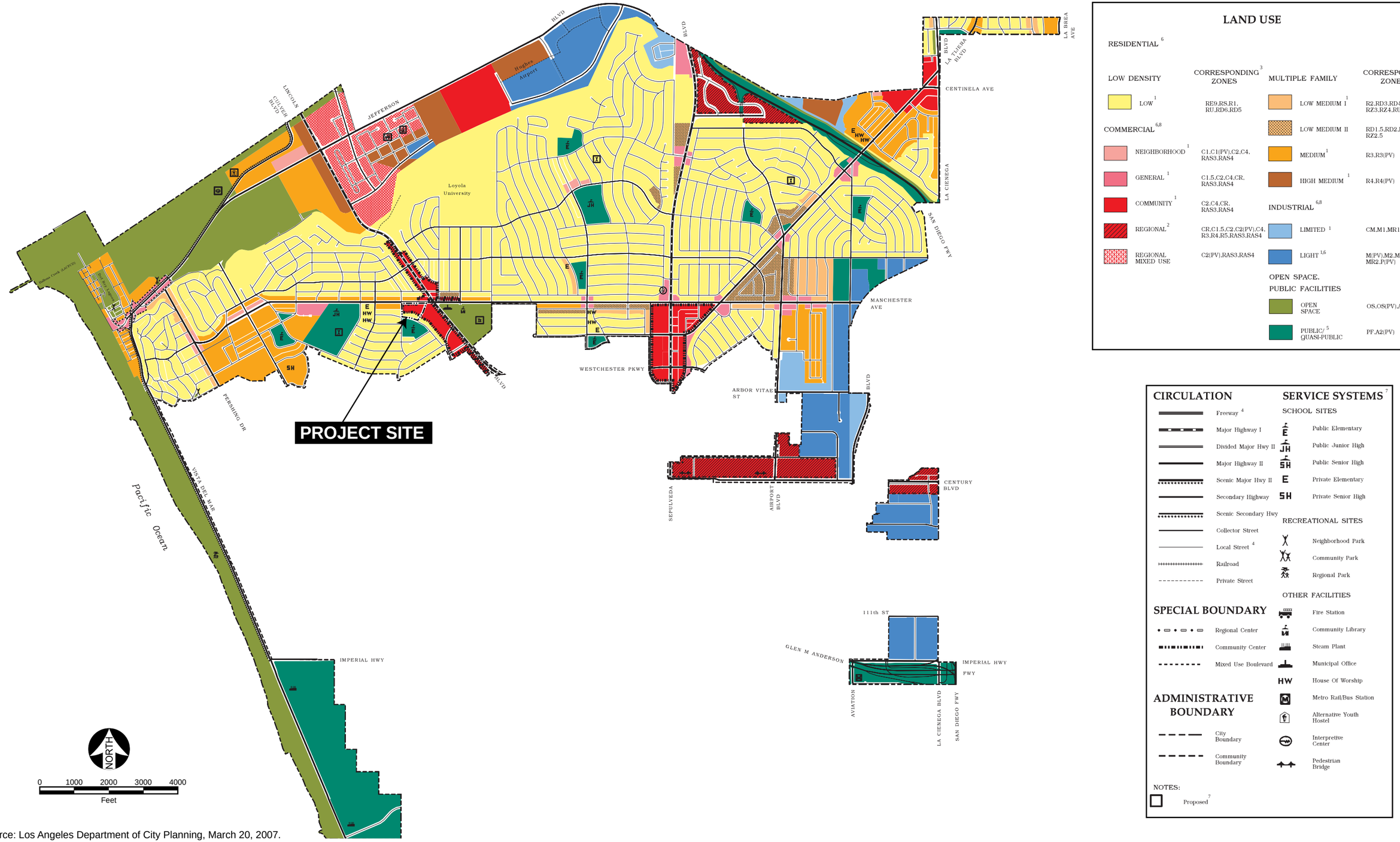
Loyola Village Community Design Overlay

Additionally, the project site is located within the boundaries of the Loyola Village Community Design Overlay (CDO) District. The Loyola Village CDO District covers 44 acres of property with Community Commercial Plan Designations along Lincoln Boulevard between Westchester Parkway to roughly north of 83rd Street, and along Manchester Avenue between Rayford Drive to the west and Fordham Road to the east (see Figure IV.G-2). The general purpose of the Loyola Village CDO, adopted July 2009 by Ordinance No. 180,797, is to provide design guidance and direction to enhance the visual identity, commercial viability, safety, walkability, appearance, and enjoyment of Loyola Village.[4] The Loyola Village CDO ensures that development within the Loyola Village area reflects the overall vision of a cohesive, pedestrian-friendly, and vibrant commercial district that serves the shopping needs of local residents, the Loyola Marymount University and Otis College communities, the Community Center employees and patrons, hotel visitors, and visitors driving through on their way to and from LAX and other destinations. Furthermore, "Q" conditions have been adopted to assure that ground floor uses are compatible with the CDO's goal of creating an active pedestrian environment.

Los Angeles Coastal Transportation Corridor

The Proposed Project is also located within the Los Angeles Coastal Transportation Corridor (Specific Plan). The Specific Plan area encompasses all or parts of the Westchester-Playa del Rey Community Plan area, the Palms-Mar Vista-Del Rey Community Plan area, the Venice Community Plan area, and the Los

[4] *Loyola Village Community Design Overlay District, July 2009.*



Source: Los Angeles Department of City Planning, March 20, 2007.

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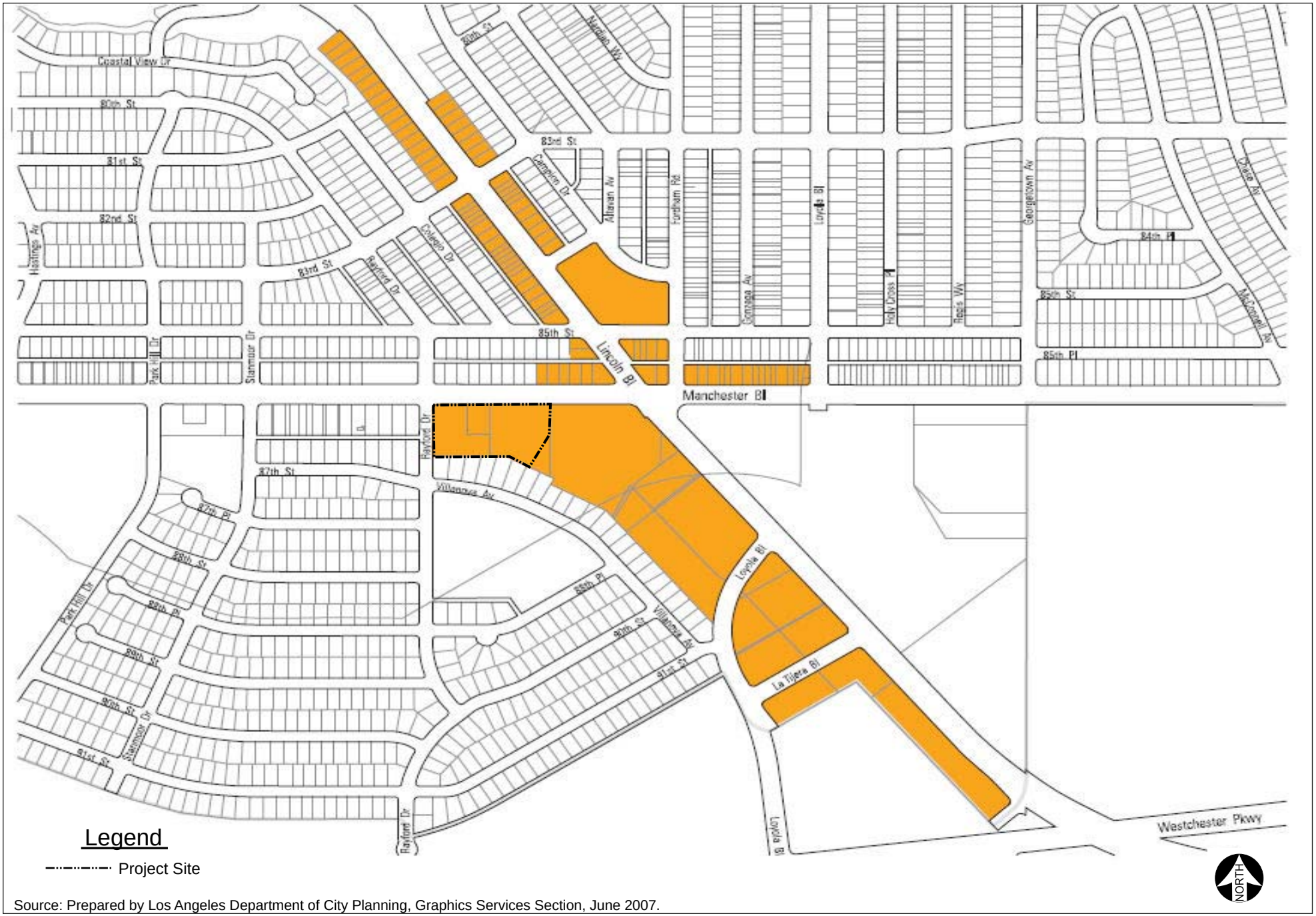
Figure IV.G-1
Westchester/Playa Del Rey Community Plan
Land Use Designations



Source: Prepared by Los Angeles Department of City Planning, Graphics Services Section, June 2007.

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Figure IV.G-2
Loyola Village Community Design
Overlay District Boundaries

Angeles International Airport Interim Plan area. The Specific Plan area is generally bound by the City of Santa Monica on the north, the San Diego Freeway on the east, Imperial Highway on the south, and the Pacific Ocean on the west (see Figure IV.G-3, Los Angeles Coastal Transportation Corridor Specific Plan Area). The overall purpose of the Los Angeles Coastal Transportation Corridor is to:

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

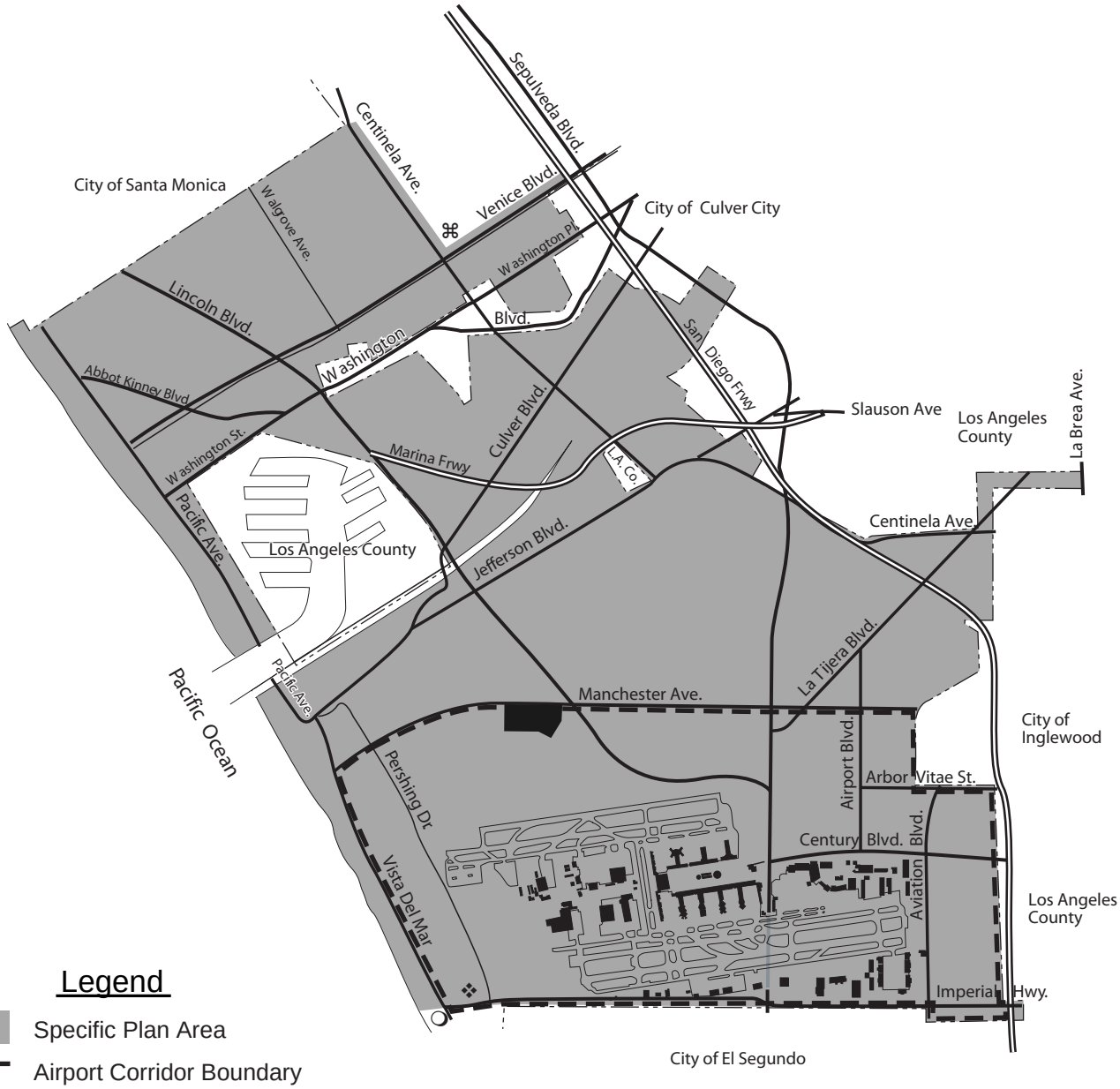
Additionally, the Specific Plan imposes a Transportation Impact Assessment (TIA) Fee upon applicants of new, non-residential development stating:

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

City of Los Angeles Planning and Zoning Code

All development activity on-site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (the "Planning and Zoning Code"). The Planning and Zoning Code includes development standards for the various districts in the City of Los Angeles. As shown in Figure IV.G-4, City Zoning Designations, the western portion of the project site is currently zoned [Q]C4-1-CDO (Q:

Coastal Tranportation Corridor Specific Plan



Legend

- Specific Plan Area
- Airport Corridor Boundary
- Project Site

NOTES:

⌘ Includes frontages on both sides of Centinela Ave. from Santa Monica City Boundary line south to Venice Blvd. and both sides of Venice Blvd from Centinela Ave. east to the San Diego Frwy

❖ Includes only northerly frontage of Imperial Hwy. between Pershing Dr. and the westerly terminus of the Specific Plan area.

❍ Westerly prolongation of Imperial Hwy. to Pacific Ocean.

NORTH

Not to Scale

Source: Westchester Playa Del Rey Plans, Coastal Tranportation Corridor Specific Plan, September 1993.

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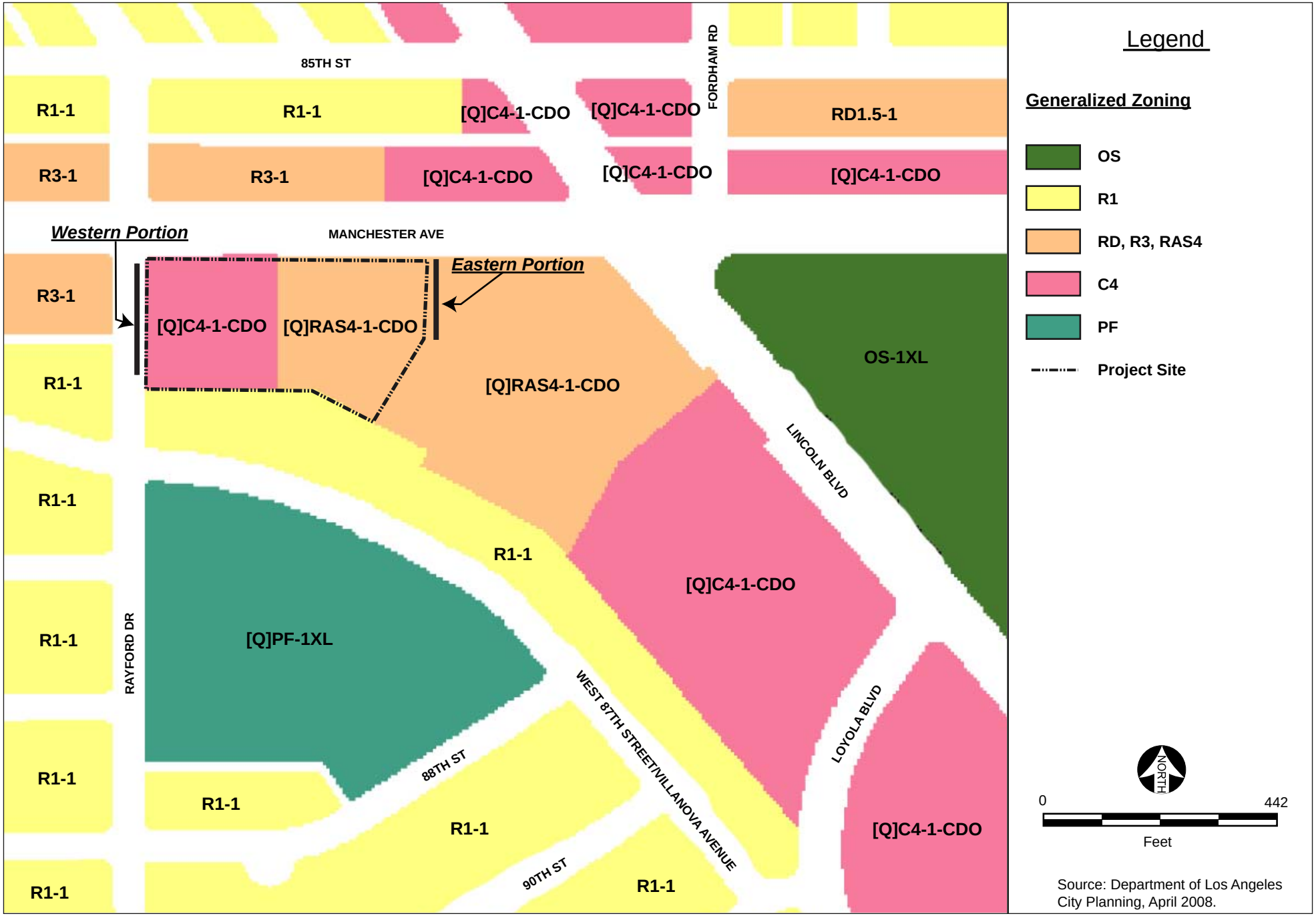
Figure IV.G-3
Los Angeles Coastal Transportation Corridor Specific Plan Area



Source: Department of Los Angeles City Planning, April 2008.

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Figure IV.G-4
City Zoning Designations

Qualified, C4: Commercial with limitations and Multi-Family residential, 1: Height District No. 1; CDO: Community Design Overlay district[5]) and the eastern portion of the project site is currently zoned [Q]RAS4-1-CDO (RAS4: Residential/Accessory Services, 1: Height District No. 1; CDO: Community Design Overlay district). Development of the project site is further restricted by separate "Q" conditions for each portion of the project site. The Q conditions for the eastern (RAS4-1) portion of the project site were established pursuant to Ordinance No. 175,996 adopted May 19, 2004 and Ordinance No. 180,797 adopted July 14, 2009. Included in the "Q" conditions for the RAS4-1 portion are floor area, density, and height limitations restricting development of the project site to 27,600 square feet of non-residential uses, 539 dwelling units, including live/work units, and 40 to 50 feet in height when located within 64 to 100 feet of a lot classified in the R1 zone, respectively. The Q conditions for the western (C4-1) portion of the project site were established pursuant to Ordinance No. 175,981 (as subarea 500), adopted May 11, 2004 and Ordinance No. 180,797 adopted July 14, 2009.[6] Included in the "Q" conditions for the C4-1 portion are residential development limitations restricting development of residential units on the ground floor for a depth of 100 feet from the frontage of Lincoln Boulevard and Manchester Avenue. The specific "Q" conditions for the C4 zone portioned of the project site are as follows:

1. Residential uses shall be prohibited on the ground floor for a depth of 100 feet from the frontage of those lots on Lincoln Boulevard and Manchester Avenue. Dwelling units identified as Joint Living and Work Quarters shall be allowed on the ground floor provided that a maximum of 33 percent of the floor area on the ground floor of the identified unit may be used for residential uses.

2. All buildings shall have their primary ground floor pedestrian entrance from Lincoln Boulevard or Manchester Avenue, even if other pedestrian entrances are provided.

3. Pole signs and illuminated architectural canopy signs shall be prohibited.

4. Exterior security grilles or permanently affixed security bars, or roll-down grilles that conceal storefront windows shall be prohibited.

5. All open areas of the site not used for buildings, driveways, parking areas, recreational facilities, pedestrian amenities or walkways shall be attractively landscaped and maintained, including the use of automatic sprinklers.

The current zoning is consistent with the Community Center land use designation for the project site under the General Plan.

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[5] *As discussed above, the project site is located within the Loyola Village Community Design Overlay district.*

[6] *Under Ordinance No. 175,981 the project site is identified as subarea 500.*

Permitted Uses

Uses that are allowed in the C4 zone include most of the uses allowed in the C2 zone and, as such, generally include those uses allowed in the CR, C1, and C1.5 zones (see LAMC Section 12.16(A)(2)). Permitted uses include, among others: multi-family residential units, office space, barber shops, retail stores, restaurants, banks, and joint living and work quarters.

Uses that are allowed in the RAS4 zone include all uses allowed in the R4 zone, which generally include those uses allowed in the RS, R1, R2, R3, and RAS3 zones (see LAMC Section 12.11.5(A)(2)). Permitted uses include multi-family residential units as well as other uses when located on the ground floor of a residential building including, but not limited to the following uses: bakeries, banks, childcare facilities, drug stores, hardware stores, restaurants (excluding restaurants with drive-through services), and schools. The RAS4 designation also allows joint live/work units on the ground floor of a structure.

Setback Requirements

Pursuant to LAMC Section 12.16(C), setbacks are not required for front yards within the C4 zone. Additionally, side and rear yard setbacks are not required for buildings that are used exclusively for commercial purposes. However, side and rear yards conforming to the requirements of the R4 zone are required at the floor level and first story for all portions of buildings erected and used for residential purposes. The R4 zone requires, for buildings exceeding two stories in height, side yards that are a minimum of five feet in width. In addition, one foot shall be added to the width of the side yard for each additional story above the second story up to a maximum of 16 feet in width. Further, the R4 zone requires, for buildings exceeding three stories in height, rear yards that are a minimum of 15 feet in depth. Additionally, one foot shall be added to the depth of the rear yard for each additional story above the third story up to a maximum of 20 feet in depth.

In the RAS4 zone, front yard setbacks at a minimum depth of five feet are required (LAMC Section 12.11.5(C)). Side yard setbacks are not required for the ground floor portion of buildings, in the RAS4 zone, when the ground floor is used exclusively for commercial purposes. However, for all portions of buildings erected and used for residential purposes, side yard setbacks are required at a minimum of five feet in width along the residential portion of the perimeter of the building. Finally, rear yard setbacks are required at a minimum of five feet in depth in the RAS4 zone.

Density Limitations

The project site is located within Height District 1. Pursuant to LAMC Section 12.21.1, Height District No. 1 allows a maximum FAR of 1.5:1[7] for buildings located within the C4 zone and a maximum FAR of

[7] *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/electrical equipment rooms on each typical floor, or parking areas.*

3:1 for buildings located in the RAS4 zone, but does not explicitly limit the heights of buildings. Additionally, in both the C4 and the RAS4 zones, the minimum lot area per dwelling unit is 400 square feet.

Open Space Requirements

Pursuant to LAMC Section 12.21(G), new construction of six or more dwelling units on a lot must provide, at a minimum, 100 square feet of usable open space for each dwelling unit having less than three habitable rooms, 125 square feet for each dwelling unit having three habitable rooms, and 175 square feet for each dwelling unit having more than three habitable rooms.[8] Usable open space may consist of private and/or common area open space; however, common open space areas must be a minimum of 400 square feet and must constitute at least 50 percent of the total open space provided.

Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees and at least one 24-inch box tree is required for every four dwelling units.

Parking Requirements

Residential parking requirements set forth in the Planning and Zoning Code are 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 (see LAMC Section 12.21(A)(4)(a)).

City of Los Angeles Sign Regulations

The City of Los Angeles regulates the placement, construction, and modification of all exterior signs and sign support structures through Division 62 (Building Code) of the LAMC. Building permits must be obtained from the Department of Building and Safety for any proposed signs and electrical permits must be obtained for signs illuminated by electrical lighting. Specific LAMC requirements and restrictions are dependent upon signage type; however, general constraints on design, construction, materials, potential for hazard to traffic and determination of such hazards are applicable.

City of Los Angeles Methane Buffer Zone

The western portion of the project site is located within the boundaries of a City of Los Angeles designated Methane Buffer Zone[9] (see Figure IV.G-5); as such, development is also subject to Chapter IX, Article 1 of the LAMC, also known as the City of Los Angeles Building Code. LAMC Section 91.7104 (under the City of Los Angeles Building Code) provides requirements for development located within a Methane Zone or Methane Buffer Zone.

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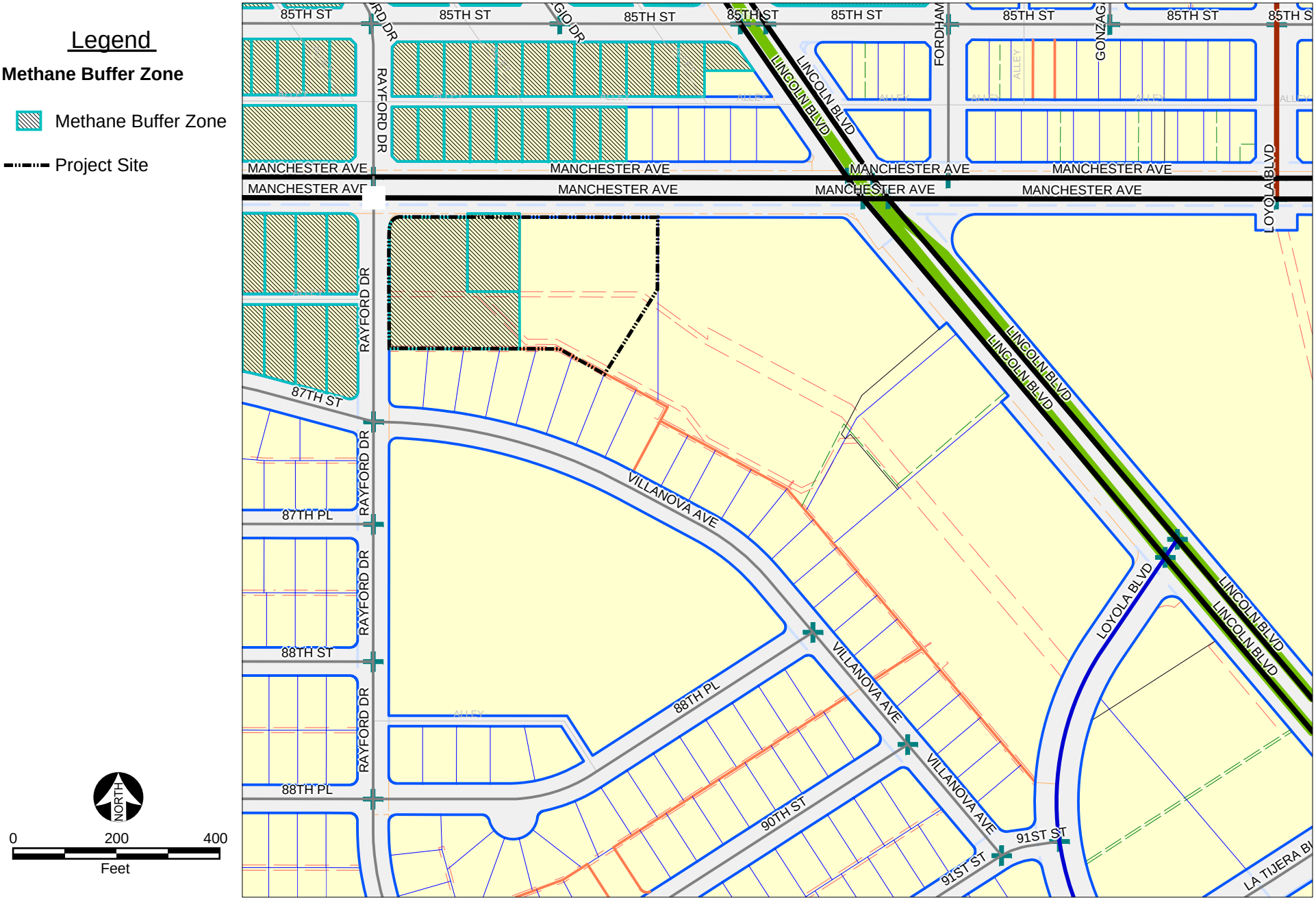
[8] *Kitchen/Dining is not counted towards habitable space, L.A.M.C. 12.21 G2 & 12.03.*

[9] *City of Los Angeles, Zoning Information and Map Access System (ZIMAS), website: http://zimas.lacity.org, July 2, 2008.*



Source: Navigate LA, City of Los Angeles.

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Figure IV.G-5
Methane Buffer Zone Map

Methane gas is generated in the area by subterranean sources that include oil fields. Methane is generated by the biodegradation of organic matter in the absence of oxygen. Methane is not toxic; however, it is combustible and potentially explosive at concentrations above 53,000 parts per million (ppm) in the presence of oxygen. While non-pressurized methane is not normally 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. Impacts associated with methane gas are discussed in Section IV.E., Hazards and Hazardous Materials.

City of Los Angeles Planning Department Walkability Checklist

In November of 2008, the City of Los Angeles Planning Department created the Walkability Checklist for Site Plan Reviews (Checklist) as a guide for City staff to use in assessing pedestrian orientation of projects subject to site plan reviews. In addition to the Community Plans and/or other adopted plans, the Checklist provides additional guidance to address the broader context of urban form and designing for pedestrians. It should be noted that the guidelines found in the Checklist are not mandatory, but have been created to improve pedestrian access, comfort, and safety with the development of new projects. Guidelines that pertain to the Proposed Project are described in greater in Table IV.G-7, Walkability Checklist Applicable Guidelines, below.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Proposed Project would have a potentially significant impact related to land use consistency if it would:

(a) Physically divide an established community;

(b) Conflict with any applicable land use plan, policy, or regulation or 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; or

(c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

Because the project site is not located within a habitat conservation plan or natural community conservation plan area, threshold question (c) above would not apply. As such, no further analysis of this question is warranted.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance levels of impacts of the Proposed Project related to land use consistency are determined on a case-by-case basis considering the following factors:

(a) Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site;

(b) Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;

(c) The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;

(d) The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; or

(e) The number, degree, and type of secondary impacts on surrounding land uses that could result from implementation of the Proposed Project.

Project Impacts

Project History

As previously discussed in Section III, Project Description, the project site is part of a larger site, the Lincoln-Manchester Property, owned by the Applicant. The Applicant is currently redeveloping a portion of the Lincoln-Manchester Property with the construction of multi-family residential, retail, and restaurant uses at the southwest corner of Manchester Avenue and Lincoln Boulevard pursuant to approvals granted by the City Council on May 19, 2004 in Case No. CPC 2003-5554-VZC-SPR (Council File 04-0443). Specifically, the City Council granted Site Plan Review approval for the construction use and maintenance of a mixed-use project consisting of 539 new multi-family residential units, 27,600 square feet of retail and redevelopment of the former Furama Hotel tower (currently named the Custom Hotel).[10] In addition to the Site Plan Review approval, the City Council also adopted Ordinance No. 175,996 on May 19, 2004 affecting a Vesting Zone Change from C2-1 and P-1 to (T)(Q)RAS4-1[11] for the approximately 6.8 acre portion of the Lincoln-Manchester Property located at the southwest corner of Manchester Avenue and Lincoln Boulevard. After obtaining the Site Plan Review and Ordinance approvals, the Applicant acquired property located at 7280 West Manchester Avenue. This lot, together with other property that the Applicant already owned at the southeast corner of Manchester Avenue and Rayford Drive, constitutes approximately one half of the 3.03 acre project site.

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[10] *The May 19, 2004 Site Plan Review approval included the approximate 0.75 acre site developed with the former Furama Hotel tower building. The Applicant no longer owns the former Furama Hotel tower property which has been redeveloped with a 250-room stand alone hotel, the Custom Hotel.*

[11] *Pursuant to Section 12.32 G of the LAMC, instead of immediately and finally rezoning a property or changing the height district, an ordinance places the property in a T or Tentative classification (T) pending the recordation of a Final Map in compliance with the provisions and requirements of Article 7 of Section 12.32, or, in certain instances by the recordation of a Parcel Map in compliance with said provisions and requirements, or, where no map is necessary, by completion or assurance of all dedications, payments, and improvements which are required by the Council to be provided, to the satisfaction of the appropriate City departments.*

As approved, the 539 dwelling units were to be constructed in three separate buildings. The Applicant is currently constructing two of the buildings, which will contain 405 dwelling units. The third building, which would contain 134 dwelling units, was approved for construction on the eastern portion of the current project site. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 dwelling units, resulting in a net increase of 126 dwelling units.

Project Characteristics

Residential and Joint Live/Work Component

The residential and joint live/work component of the Proposed Project involves development of 260 dwelling units, which would include 16 live/work units, 58 studio units, 95 one bedroom units, and 91 two bedroom units. The joint live/work units would be located on the ground level (podium level) of the proposed building fronting Manchester Avenue, and would include direct pedestrian access from Manchester Avenue. The fourth floor residential units that face Manchester Avenue would include mezzanines above the top floor with private terraces. Each mezzanine would be a maximum of 500 square feet.

Parking and Access

Parking for the Proposed Project would be provided in three levels of parking (two above ground levels, one subterranean level) with a total of 475 parking spaces. The parking area would be constructed directly behind the joint live/work units, with additional parking below the residential units. Vehicular access would be shared with the Playa del Oro development and would be provided via existing driveways on Manchester Avenue and Rayford Drive, allowing access to and from the parking area on the east and south sides of the structure, respectively.

Open Space and Landscaping

Open space available to residents would be provided with approximately 1,400 square feet of multi-purpose room/gym area on the ground floor (podium level), a swimming pool, outdoor courtyard, and private balconies. The Proposed Project would also provide approximately 58,437 square feet of common open area, including 35,159 square feet of landscaped area.

Requested Discretionary Actions or Applications

In order to permit development of the Proposed Project, the following discretionary land use approvals have been requested by the Applicant:

- Zone Change. In order to accommodate the Proposed Project, the Applicant seeks a vesting zone change for the Project Site from [Q]C4-1-CDO, on the western portion, and [Q]RAS4-1-CDO (Residential/Accessory Services), on the eastern portion, to (T)(Q)RAS4-1-CDO for the entire

project site, which would include a new set of (T) and [Q] conditions to be implemented by the Proposed Project;[12] and

- Site Plan Review. Pursuant to LAMC section 16.05-D.2, the Applicant requests Site Plan Review approval for the Proposed Project. This Site Plan Review would supersede the Site Plan Review granted in CPC 2003-5554-VZC-SPR with respect to the Project Site.

Community Division

Land Use Compatibility

While Appendix G of the *State CEQA Guidelines* does not include any significance thresholds relating to a Proposed Project's land use compatibility with existing uses in the vicinity of the project site, the *L.A. CEQA Thresholds Guide* does address land use compatibility. Additionally, it is useful to address the functional compatibility of the Proposed Project with its surrounding land uses. Functional compatibility is defined as the capacity for adjacent, yet dissimilar land uses to maintain and provide services, amenities, and/or environmental quality associated with such uses. Potentially significant functional land use compatibility impacts may be generated when a proposed project hinders the functional patterns of use and relationships associated with existing land uses. Patterns of use relate to the interaction and movement of people, goods, and/or information.

The physical compatibility of the Proposed Project with its environs is based on an analysis of proposed uses and improvements and their potential on-site and off-site impacts on traffic, noise, air quality, and aesthetics. These impacts, together with proposed mitigation measures, where applicable, are discussed in their respective sections of this Draft EIR. As such, this section focuses on the compatibility of the Proposed Project from a functional perspective.

The project site is located in the Westchester community, which is generally characterized by a mix of residential and commercial uses. The area surrounding the project site is developed with residential, commercial, and retail uses as well as recreational facilities and parking lots. As the uses proposed by the project, which are residential and joint live/work units, are similar to those mentioned above, the Proposed Project would be compatible with the types of uses surrounding the project site.

More specifically, the Proposed Project would be developed adjacent to single-family residential uses along Villanova Avenue to the south of the project site, along with single-family residential uses along Rayford Drive southwest of the project site. Development of the Proposed Project would create more of a

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[12] *Pursuant to Section 12.32 G of the LAMC, instead of immediately and finally rezoning a property or changing the height district, an ordinance places the property in a T or Tentative classification (T) pending the recordation of a Final Map in compliance with the provisions and requirements of Article 7 of Section 12.32, or, in certain instances by the recordation of a Parcel Map in compliance with said provisions and requirements, or, where no map is necessary, by completion or assurance of all dedications, payments, and improvements which are required by the Council to be provided, to the satisfaction of the appropriate City departments.*

visual contrast between the existing structures to the south and southwest and the proposed structure due to its height and massing. However, development of the Proposed Project would not limit access to the existing residential uses to the south, nor would it divide the established community.

The building heights and massing that would be developed with the implementation of the Proposed Project would create a change in the visual character of the project site from what currently exists. The Proposed Project would provide a visual contrast to the low-density commercial uses and surface parking lot currently on the project site. However, it would be similar in design to the adjacent Playa del Oro mixed-use development currently under construction directly east of the project site, as well as the multi-family residential uses along Manchester Avenue to the north of the project site.

As the Proposed Project would include similar uses to those of the surrounding area and be consistent with the design of surrounding development, no significant impacts would result from the Proposed Project with regard to land use compatibility. Furthermore, the Proposed Project would not physically divide an established community as no separation of uses or disruption of access between land use types would occur as a result of the Proposed Project.

Consistency with Land Use Plans, Policies, and Regulations

2008 Regional Comprehensive Plan

The 2008 RCP identifies specific goals related to regional growth, mobility, and sustainability as follows:

- Successfully integrate land and transportation planning and achieve land use and housing sustainability;
- Develop sufficient water supplies through environmentally sustainable imports, local conservation, conjunctive use, reclamation, and reuse;
- Achieve water quality improvements through implementation of land use and transportation policies and programs that promote water stewardship and eliminate water impairments and waste in the region;
- Foster comprehensive and collaborative watershed planning within the region that produces water wise program and projects;
- Reduce our region's consumption of non-renewable energy;
- Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and ambient air quality standards as soon as practicable;
- Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas;

- Minimize land uses that increase risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM_{10}, $PM_{2.5}$, ultrafine), and carbon monoxide; and

- Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.

The Proposed Project supports the 2008 RCP goals by locating the Proposed Project in proximity to a job-rich area (see Section IV.C. Air Quality, subheading AQMP Consistency), thus minimizing urban sprawl, associated automobile trip emission, and demand on local infrastructure. In addition, the project site is located in proximity to existing public transit opportunities provided by Metro and Big Blue Bus (BBB) lines, which provide service in the immediate project vicinity.

The Proposed Project would be consistent with the 2008 RCP objectives regarding water quality, watershed management and planning, and sustainable water supplies. The Proposed Project would incorporate the use of existing and planned stormwater catchment systems and would direct stormwater in a manner that would not result in substantial erosion or flooding within the project site or off-site locations. In addition, if required, new storm drains would be designed and sized using the Los Angeles County Hydrology Manual method for a minimum 50-year-frequency storm event capacity.

In addition, the Proposed Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality (refer to Section IV.L. Utilities). Accordingly, the Proposed Project would be generally consistent with the 2008 RCP and related land use impacts would be less than significant.

City of Los Angeles General Plan

The Proposed Project would generally conform to the policies identified in the various Elements of the General Plan. The Housing Element policies to which the Proposed Project would conform are provided in Table IV.G-1, Project Consistency with Applicable General Plan Housing Element Policies.

Table IV.G-1
Project Consistency with Applicable General Plan Housing Element Policies

Policy	Consistency Discussion
Policy 2.1.2: Facilitate neighborhood safety through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier and to enhance aesthetic appearance, secure storage areas, and good visual connections.	**Consistent:** The Proposed Project would include a landscaped buffer and pedestrian walkway along Manchester Avenue. Additionally, design of the Proposed Project includes approximately 58,437 square feet of common open space including 35,159 square feet of landscaped area. The Proposed Project would also include adequate security lighting throughout the project site. Therefore, the Proposed Project would be consistent with this policy.
Policy 2.1.4: Enhance livability of neighborhoods by upgrading the quality of development and improving	**Consistent:** The Proposed Project would provide a new mixed-use development and improve the aesthetic

Table IV.G-1 (Continued)
Project Consistency with Applicable General Plan Housing Element Policies

Policy	Consistency Discussion
the quality of the public realm, including streets, streetscape, and landscaping to provide shade and scale.	quality of the project site with incorporation of shaded landscape areas along walkways and external roadway frontages. Additionally, the Proposed Project would include a landscaped buffer along Manchester Avenue. Therefore, the Proposed Project would be consistent with this policy.
Policy 2.3.1: Encourage and plan for high intensity residential and commercial development in centers, districts and along transit Corridors, as designated in the Community Plans and the Transportation Element of the General Plan, and provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips and vehicle miles traveled in order to mitigate traffic congestion, air pollution, and urban sprawl.	**Consistent:** The Proposed Project would provide high-density residential with joint live/work units on property close to major thoroughfares. The project site is located near several transit lines, including the City of Santa Monica Big Blue Bus Line 3, which provides access to the Metro Green Line Station at Aviation Boulevard and Imperial Highway, and Metro Bus Line 115, which provides daily service between Playa del Rey and the City of Norwalk, and is within walking distance of many commercial opportunities. Both the City of Santa Monica Big Blue Bus Line 3 and the Metro Bus Line 115 have stops at Lincoln Boulevard and Manchester Avenue, approximately 0.15 miles east of the project site. Therefore, the Proposed Project would be consistent with this policy.
Policy 2.3.3: Encourage the development of new projects that are accessible to public transportation and services consistent with the community plans. Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent:** The project site is located near major thoroughfares that are well-served by existing public services and infrastructure, including local bus lines. The local bus lines also provide access to transit lines, such as the Metro Green Line which is accessible from the City of Santa Monica Big Blue Bus Line 3 transit route. The Proposed Project is also located within walking distance of multiple commercial opportunities. Furthermore, the Proposed Project would include adequate bicycle parking, encouraging bicycle use. Therefore, the Proposed Project would be consistent with this policy.
Policy 3.1.4: Aggressively support equal opportunity practices in the sale or rental of housing without regard to race, ethnicity, religion, disability, sexual orientation, age, gender, and family status, and develop specific programs to maximize these opportunities.	**Consistent:** The Proposed Project would introduce market-rate housing for the general population in the Westchester-Playa del Rey area. Therefore, the Proposed Project would be consistent with this policy.

Source: City of Los Angeles Department of City Planning, Housing Element of the City of Los Angeles General Plan, adopted December 18, 2001, approved January 2002.
Source (table): Christopher A. Joseph & Associates, August 2008.

Westchester-Playa del Rey Community Plan

Consistency with Community Plan Land Use Designation

The Community Plan is part of the Land Use Element of the Citywide General Plan and sets forth specific land use requirements and required entitlements for projects in a specific community within the City. The Community Plan designates the project site as Community Commercial and refers to the City of Los

Angeles Municipal Code for specific land uses permitted within this designation. The Community Commercial land use designation allows for the construction of commercial and medium- to high-density multi-family residential uses. Development of the Proposed Project would include the construction of a mixed-use development containing multi-family residential and joint live/work units. This type of development would be consistent with the Community Commercial land use designation.

The current zoning on the project site is [Q]C4-1-CDO, on the western portion, and [Q]RAS4-1-CDO, on the eastern portion. The Proposed Project includes a proposed zone change from the current split zoning to (T)(Q)RAS4-1-CDO, with the conditions that would incorporate the required mitigation measures, for the entire project site. Under the Community Plan, the RAS4 zone corresponds to the Community Commercial designation. Therefore, if approved, the proposed zone change would be consistent with the Community Plan.

Consistency with Community Plan Policies

As shown in Table IV.G-2, Project Consistency with Applicable Westchester-Playa del Rey Community Plan Policies, the Proposed Project would implement a number of Community Plan policies, thereby assisting the City in meeting many of the Community Plan's goals and objectives.

Table IV.G-2
Comparison of Westchester-Playa del Rey Community Plan Policies to Proposed Project Characteristics*

Policies	Consistency of the Proposed Project
Residential	
Policy 1-1.2: The City should promote neighborhood preservation, particularly in existing single-family neighborhoods, as well as in areas with existing multiple family residences.	**Consistent.** The Proposed Project would remove the existing commercial uses and develop approximately 260 multi-family residential units, including 16 joint live/work units. The additional 260 units would serve the needs of expected new residents within the Westchester community. Additionally, the Proposed Project would be similar in scale to the adjacent Playa del Oro development and the three-story multi-family residential structure northwest of the project site, thereby preserving the existing neighborhood. Therefore, the Proposed Project would be consistent with this policy.
Policy 1-2.1: Locate higher residential densities near commercial centers, public facilities, bus routes and other transit services.	**Consistent.** The Proposed Project would provide higher density residential and joint live/work uses located near major thoroughfares with access to transit lines. The Proposed Project would also be located near the Loyola Village commercial center as well as Westchester Recreation Center and the Westchester-Loyola Village Branch Library. Therefore, the Proposed Project would be consistent with this policy.
Policy 1-3.1: Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods.	**Consistent.** The Proposed Project would be designed to coordinate with the adjacent Playa del Oro development directly east of the project site. Architectural features and colors used would be complementary to those used in the design of the Playa del Oro development. Additionally, the Proposed Project would be similar in scale to the adjacent Playa del Oro development and the three-story multi-family residential structure northwest of the project site, as well as other higher density structures in the project area (see Section IV.B. Aesthetics). Landscaping would be attractively designed to enhance the visual character of the Proposed Project as

Table IV.G-2 (Continued)
Comparison of Westchester-Playa del Rey Community Plan Policies to Proposed Project Characteristics*

Policies	Consistency of the Proposed Project
	well as create a pedestrian-friendly environment compatible with the surrounding residential neighborhood, commercial uses, and recreational facilities. Therefore, the Proposed Project would be consistent with this policy.
Policy 1-4.4: Encourage multiple family residential and mixed use development in commercial zones, pedestrian oriented areas, and near transit corridors.	**Consistent.** The Proposed Project includes development of approximately 260 multi-family residential units, including 16 joint live/work units, located near major thoroughfares with access to transit lines. The Proposed Project would also be located near the Loyola Village commercial center and would be directly adjacent to the Playa del Oro development, currently under construction, which will include ground floor retail uses. Therefore, the Proposed Project would be consistent with this policy.
Policy 1-5.1: Where possible, do not locate incompatible land uses, including higher density multiple residential uses, within or in close proximity to lower density residential neighborhoods, except where there are adequate buffers, transitional land uses, etc.	**Consistent.** The Proposed Project would meet the required setbacks for front, side, and rear yards (see discussion below under the City of Los Angeles Planning and Zoning Code subheading), thereby providing an adequate buffer between the Proposed Project and the single-family residences south of the project site. Furthermore, the proposed zone change would designate the entire project site as (T)[Q]RAS4-1-CDO. The project site is located in Height District 1, which typically permits a maximum floor area ratio (FAR) of 3:1 with no height limit in the RAS4 zone. The proposed 260 residential units, including 16 joint live/work units, would occupy 266,456 square feet and would be developed on a 131,943 square-foot lot. Thus, the FAR for the Proposed Project would be 2.02:1, which falls within the allowable 3:1 FAR. Therefore, the Proposed Project would be consistent with this policy.
Commercial	
Policy 2-2.1: Encourage pedestrian-oriented development in appropriate areas, to include Downtown Westchester, Loyola Village, Playa Del Rey, and Playa Vista.	**Consistent.** The Proposed Project would be located within walking distance of many commercial opportunities in Loyola Village and would be designed to encourage pedestrianism by locating joint live/work units on the ground floor of the structure with direct public access from Manchester Avenue. Therefore, the Proposed Project would be consistent with this policy.
Open Space	
Policy 5-1.4: Where possible, encourage the provision of open space within large privately-owned projects.	**Consistent.** The Proposed Project would provide approximately 59,837 square feet of common open space, including 35,159 square feet of landscaped area, and approximately 1,400 square feet of private open space to include a multi-purpose room and gym area, as well as a swimming pool, commensurate with its size. Therefore, the Proposed Project would be consistent with this policy.
Transportation	
Policy 11-2.1: No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations: The transportation infrastructure serving the project site and surrounding area,	**Consistent.** As discussed in Section IV.K. Traffic, Transportation, and Parking, development of the Proposed Project would result in a net decrease in the amount of daily project trips compared to the existing uses. Consequently, the Proposed Project would result in less than significant impacts on the seven study intersections and the study residential street segment. Furthermore, the Proposed Project is not expected to add 150 or more directional trips to any CMP monitored freeway location; thus no significant impacts would occur at surrounding freeways or highways. Therefore, the transportation

Table IV.G-2 (Continued)
Comparison of Westchester-Playa del Rey Community Plan Policies to Proposed Project Characteristics*

Policies	Consistency of the Proposed Project
specifically the Freeways, Highways, and Streets presently serving the affected area within the Westchester-Playa del Rey Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.	infrastructure serving the project area would have adequate capacity to accommodate existing traffic volumes as well as traffic generated by the Proposed Project. The Proposed Project would be consistent with this policy.
Parking	
Policy 17-1.2: Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.	**Consistent.** The Proposed Project would include a parking garage consisting of two above-grade levels and one subterranean level. Additionally, the parking garage would be constructed below the proposed building with access located on the eastern side of the proposed structure between the Proposed Project and the Playa del Oro development. Therefore, the Proposed Project would be consistent with this policy.
Design Policies for Individual Projects	
Commercial	
Mixed Use: Maximize commercial uses on the ground floor to promote a more lively and pedestrian-oriented commercial environment.	
1. Prohibit residential uses on the ground floor of buildings in commercial and residential-accessory services zones.	**Consistent.** The Proposed Project would develop approximately 260 multi-family residential units, including 16 joint live/work units. The 16 joint live/work uses would be located on the ground floor of the proposed structure fronting Manchester Avenue and would include direct pedestrian access from Manchester Avenue. No multi-family residential units would be located on the ground floor. Therefore, the Proposed Project would be consistent with this policy.
Design Policies for Individual Projects	
Multiple Family Residential	
Site Planning: Where feasible, multiple family residential development of five or more units should be designed around a landscaped focal point or courtyard to serve as an amenity for residents.	
1. Provide a pedestrian entrance at the front of each project.	**Consistent.** Access to the project site's main entrance would be located along Manchester Avenue. Additionally, the Proposed Project would include 16 joint live/work units, which would be located on the ground floor of the proposed building fronting Manchester Avenue. These joint live/work units would include direct public access from Manchester Avenue. Therefore, the Proposed Project would be consistent with this policy.
2. Require useable open space for outdoor activities, especially for children.	**Consistent.** The Proposed Project would provide approximately 59,837 square feet of common open space, including 35,159 square feet of landscaped area, and approximately 1,400 square feet of private open space to include a multi-purpose room and gym area, as well as a swimming pool. Therefore, the Proposed Project would be consistent with this policy.
Design: The design of all buildings should be of a quality and character that improves community appearance by avoiding excessive variety or monotonous repetition. Achievement of this can be accomplished via the following:	
1. Requiring the use of articulations, recesses, surface perforations and/or porticoes to break up long, flat building	**Consistent:** The only breaks in building façade would be for access to and from the subterranean parking structure. Architectural features would be included into the building design to create

Table IV.G-2 (Continued)
Comparison of Westchester-Playa del Rey Community Plan Policies to Proposed Project Characteristics*

Policies	Consistency of the Proposed Project
facades.	continuity across the building façade. Therefore, the Proposed Project would be consistent with this policy.
2. Utilize complementary building materials on building facades.	**Consistent.** The Proposed Project would be designed to coordinate with the adjacent Playa del Oro development, which is currently under construction directly east of the project site. Building materials chosen would be complementary to those used in the design of the Playa del Oro development. Therefore, the Proposed Project would be consistent with this policy.
3. Incorporate variation in design to provide definition for each floor.	**Consistent.** The building frontages would be designed in response to pedestrian scale with first floor setbacks where required. The façade of the structure would include variations in texture, color, architectural features, and massing, creating a distinctive and varied building façade. Therefore, the Proposed Project would be consistent with this policy.
4. Integrate building fixtures, awnings, and security fences and gates, into the design of building(s).	**Consistent.** All building fixtures, awnings, and security fences and gates will be incorporated into the design of the Proposed Project. Therefore, the Proposed Project would be consistent with this policy.
5. Screen all roof-top equipment and building appurtenances from view.	**Consistent.** All roof-top equipment located on the roof of the proposed structure would be screened from public view. The Proposed Project would be consistent with this policy.
6. Require decorative masonry walls to enclose trash areas.	**Consistent.** All trash storage bins would be screened from public view. The Proposed Project would be consistent with this policy.
Community Design and Landscape Guidelines	
I. Parking and Access Plans for Pedestrian-Oriented Commercial Areas	
2. Limit the number of driveways from major and secondary highways and pedestrian-oriented streets.	**Consistent.** As discussed in Section IV. K. Traffic, Transportation, and Parking, Manchester Avenue is a dedicated Major Highway Class II. Vehicular access to project site would be provided via one driveway on Manchester Avenue and one additional driveway on an alley way which connects to Rayford Drive. Thus the number of driveways providing access from Manchester Avenue would be limited. Therefore, the Proposed Project would be consistent with this policy.
5. Use side streets and rear alleys for access where possible.	**Consistent.** As discussed, vehicular access to the project site would be provided via one driveway on Manchester Avenue and one driveway on an alley way connected to Rayford Drive. Therefore, the Proposed Project would be consistent with this policy.
7. Use shared parking facilities and/or driveways in area where necessary to provide convenient parking and/or minimize the number of driveways.	**Consistent.** Vehicular access to the project site would be shared with the adjacent Playa del Oro development thus minimizing the number of driveways needed for the Proposed Project and the adjacent development. Therefore, the Proposed Project would be consistent with this policy.
Design Considerations for Special Areas	
B. Loyola Village	
1. Require all new buildings to be oriented toward and have pedestrian entrances from the street.	**Consistent.** The Proposed Project would develop approximately 260 multi-family residential units, including 16 joint live/work units. The 16 joint live/work uses would be located on the ground floor of the proposed structure fronting Manchester Avenue and would include direct pedestrian access from Manchester Avenue. Therefore, the Proposed Project would be consistent with this policy.
4. Limit number of driveways crossing	**Consistent.** Vehicular access to the project site would be provided

Table IV.G-2 (Continued)
Comparison of Westchester-Playa del Rey Community Plan Policies to Proposed Project Characteristics*

Policies	Consistency of the Proposed Project
sidewalks on Lincoln Boulevard and Manchester Avenue. Use side streets and rear alleys for vehicular access to on-site parking where possible.	via one driveway on Manchester Avenue and one driveway on an alley way directly south of the project site connected to Rayford Drive. Thus the number of driveways on Manchester Avenue would be minimized. Therefore, the Proposed Project would be consistent with this policy.

* *This table lists only those policies that are applicable to the Proposed Project (i.e. policies relating to industrial or other land uses are not analyzed).*
Source: City of Los Angeles Department of City Planning, Westchester-Playa del Rey Community Plan, Adopted April 13, 2004.
Source (table): Christopher A. Joseph & Associates, July 2008.

Loyola Village Community Design Overlay

The project site is located within the boundaries of the Loyola Village CDO District. An analysis of the Proposed Project's consistency with the CDO's design guidelines and standards is provided in Table IV.G-3.

As shown in Table IV.G-3, the Proposed Project would be generally consistent with the design guidelines and standards provided in the Loyola Village CDO. Therefore, project impacts would be less than significant.

Table IV.G-3
Comparison of Loyola Village Community Design Overlay Design Guidelines and Standards to Proposed Project Characteristics*

Design Guidelines and Standards	Consistency of the Proposed Project
Setbacks	
Guideline 1: Encourage an inviting pedestrian environment and provide for streetwall continuity by locating buildings so they front the main commercial street, and encourage active public uses, such as additional street trees, outdoor seating, kiosks, forecourts and arcades.	
Standard 1a: For all projects with ground-floor commercial uses, the ground-level exterior streetwall of any new construction or addition of floor area should be located not more than 2 feet from any property line abutting the front yard.	**Consistent.** The Proposed Project would include 16 joint live/work uses located on the ground floor of the proposed structure fronting Manchester Avenue. These ground floor joint live/work uses would be constructed no more than two feet from any property line abutting the front yard. Therefore, the Proposed Project would be consistent with this policy.
Parking and Access	
Guideline 2: Improve streetwall continuity and encourage a safe and inviting pedestrian environment by locating parking away from the streetwall and minimizing direct driveway access from major streets. Design parking facilities that do not depreciate the visual quality of the Village.	
Standard 2a: Parking for all new buildings should be located underground, when possible.	**Consistent.** The Proposed Project would include a parking garage consisting of two above-grade levels and one subterranean level. The parking area would be constructed directly behind the joint live/work units, with additional parking below the residential units, with access

Table IV.G-3 (Continued)
Comparison of Proposed Loyola Village Community Design Overlay Design Guidelines and Standards to Proposed Project Characteristics

Design Guidelines and Standards	Consistency of the Proposed Project
	located on the eastern side of the proposed structure between the Proposed Project and the Playa del Oro development. Therefore, the Proposed Project would be consistent with this policy.
Standard 2d: New driveways or curbcuts along Lincoln Boulevard or Manchester Avenue are prohibited provided there is vehicular access from side streets or alleys to the rear of the lot. Lincoln and Manchester shall be maintained and improved to promote walkability.	**Consistent.** Vehicular access to the project site would be provided via existing driveways on Manchester Avenue and Rayford Drive. No new driveways would be constructed along Manchester Avenue. Therefore, the Proposed Project would be consistent with this policy.
Ground-Floor Façade Articulation	
Guideline 3: Heighten visual interest and enhance pedestrian orientation by incorporating three-dimensional elements and material variation into the ground-floor façade of buildings. These elements and variations include: changes in building materials, texture and color; generously sized transparent display windows; arcades, canopies, and awnings; cornices; other details such as transom windows and over doors.	
Standard 3b: For all buildings, one or more of the following vertical elements: columns, pilasters, indentations, storefront bays, material treatment, landscaping, should be employed for every 25 horizontal feet of building façade.	**Consistent.** The Proposed Project would include such vertical design elements as columns, pilasters, indentations, material treatment, and landscaping for every 25 horizontal feet of building façade. Therefore, the Proposed Project would be consistent with this policy.
Massing and Articulation of Upper Stories	
Guideline 4: Provide visual interest and enhance the public realm by employing rhythmic, three-dimensional variations in massing and building form, including the use of recessed windows, towers, columns, cornices, and changes in the wall plane. Minimize building mass impacts on adjacent residential neighborhoods by allowing for ventilation, light, and privacy.	
Standard 4a: For every 40 horizontal feet of façade abutting the street, multistory projects should provide at least one three-dimensional variation per story above the first, in the overall building form. The variations can be combined to extend along several stories.	**Consistent.** The Proposed Project would be designed to provide visual interest and to minimize impacts on the adjacent residential neighborhoods. The Project Applicant would incorporate into the project design at least one three-dimensional variation per story above the ground level for every 40 horizontal feet of building façade. Therefore, the Proposed Project would be consistent with this policy.
Color	
Guideline 5: Color is integral to the aesthetics of a building and affects the visual appearance, scale and proportion of a building. Color schemes should be selected in relation to the overall design intent of the building and should be simple, harmonious and complement adjacent structures. The purpose of these guidelines is to encourage individuality in architectural expression within the context of the overall appearance of the block face and the district.	
Standard 5b: Color shades of individual buildings should be chosen to complement the colors of adjacent structures and facilitate blending with surrounding properties and unifying the development.	**Consistent.** The Proposed Project would be designed to coordinate with the adjacent Playa del Oro development, which is currently under construction directly east of the project site. Colors chosen would be complementary to those used in the design of the Playa del Oro development. Therefore, the Proposed Project would be consistent with this policy.
Entrances	
Guideline 7: Emphasize pedestrian orientation and accessibility by creating well-articulated and inviting building entrances, and by orienting these entrances towards the primary street.	
Standard 7a: All buildings shall have a ground floor whose primary entrance is oriented towards Lincoln	**Consistent.** Access to the project site's main entrance would be located along Manchester Avenue. Additionally,

Table IV.G-3 (Continued)
Comparison of Proposed Loyola Village Community Design Overlay Design Guidelines and Standards to Proposed Project Characteristics

Design Guidelines and Standards	Consistency of the Proposed Project
Boulevard or Manchester Avenue, even if other pedestrian entrances are provided. This may include entrances accessed through courtyards, arcades, or forecourts abutting the main commercial street.	the Proposed Project would include 16 joint live/work units, which would be located on the ground floor of the proposed building fronting Manchester Avenue. These joint live/work units would include direct public access from Manchester Avenue. Therefore, the Proposed Project would be consistent with this policy.
Parking Structure Design	
Guideline 8: Provide parking opportunities that are simultaneously convenient and enhance and protect the visual integrity of the boulevard. Architecturally integrate parking structures into the design of the projects that they serve, and activate the street by including commercial uses on the ground level of structures. Protect nearby residents from the potential adverse impacts – noise, visual, or otherwise – from parking structures and their use.	
Standard 8a: The ground floor of new parking structures shall consist of commercial space fronting Lincoln or Manchester, measuring a depth of at least 15 feet from the building façade. Freestanding parking structures (void of commercial space) directly abutting Lincoln or Manchester, are not an appropriate use.	**Consistent.** Parking for the Proposed Project would be constructed beneath the proposed building and would be provided in two above-ground and one subterranean level. The first above-ground parking level would be located at the ground floor behind the live/work units fronting Manchester Avenue, with the second above-ground parking level being constructed above this level. As such, there would be one parking level located above the ground floor. Vehicles on this above-ground parking level would be screened from public view. Therefore, the Proposed Project would be consistent with this policy.
Standard 8b: Floors of parking should be visually integrated into the design of buildings, as reflected in the building façade. Landscaping should be used to further integrate and screen parking garages.	**Consistent.** Parking for the Proposed Project would be constructed beneath the proposed building and would be provided in two above-ground and one subterranean level. The first above-ground parking level would be constructed on the ground floor behind the live/work units, with the second above-ground parking level being constructed above this level. The parking structure would be integrated into the building design and would be shielded from public view toward the back of the proposed structure and away from Manchester Avenue. Therefore, the Proposed Project would be consistent with this policy.
Standard 8c: Automobiles on parking levels above the ground floor should be screened from public view.	**Consistent.** Parking for the Proposed Project would be constructed beneath the proposed building and would be provided in two above-ground and one subterranean level. The first above-ground parking level would be located at the ground floor with the second above-ground parking level being constructed above this level. As such, there would be one parking level located above the ground floor. Vehicles on this above-ground parking level would be screened from public view. Therefore, the Proposed Project would be consistent with this policy.
Standard 8d: Parking structures that abut or are adjacent to any residential zone, should: i. Contain solid spandrel panels a minimum of 3-feet-6-inches in height installed at the ramps of the structure to minimize headlight glare.	**Consistent.** Parking for the Proposed Project would be provided in two above-ground and one subterranean level. The first above-ground parking level would be located at the ground floor behind the live/work units, with the second above-ground parking level being constructed above this level. The parking structure would include panels to minimize headlight glare and floors and ramps

Table IV.G-3 (Continued)
Comparison of Proposed Loyola Village Community Design Overlay Design Guidelines and Standards to Proposed Project Characteristics

Design Guidelines and Standards	Consistency of the Proposed Project
ii. Construct garage floors and ramps using textured surfaces to minimize tire squeal. iii. Not contain exhaust vents along sides closest to residential use.	would include textured surfaces to minimize tire squeal. Additionally, exhaust vents would not face the residential uses to the south of the project site. Therefore, the Proposed Project would be consistent with this policy.
Utility and Service Areas/Mechanical Equipment	
Guideline 11: Improve the pedestrian environment along the sidewalk and minimize visual blight by screening unsightly equipment and locating it away from public streets and other public rights-of-way, including pedestrian walkways and parking areas.	
Standard 11a: Utilities, storage areas, trash containers, air conditioning units, fire alarms, and similar equipment should be placed to the rear of the site or underground. Otherwise, structures housing such elements should be screened with landscaping or designed in a way as to be as inconspicuous as possible.	**Consistent.** All utilities and other equipment would be screened from public view. Therefore, the Proposed Project would be consistent with this policy.
Standard 11b: Trash storage bins should be located within a gated, covered enclosure and screened with landscaping, so as not to be viewed from the public right-of-way.	**Consistent.** All trash storage bins would be screened from public view. The Proposed Project would be consistent with this policy.
Standard 11c: Rooftop mechanical equipment should be screened with materials that are architecturally integrated [in]to the building.	**Consistent.** All mechanical equipment located on the roof of the proposed structure would be screened from public view. The Proposed Project would be consistent with this policy.
Fencing and Walls	
Guideline 12: Support an open and accessible physical environment by minimizing visual barriers and the enclosure of outside space. Locate and design any necessary fencing in a manner so as not to detract from the quality of the pedestrian experience along the sidewalk adjacent to Lincoln or Manchester.	
Standard 12a: Fences and walls should not front public streets, unless required by the Los Angeles Municipal Code.	**Consistent.** LAMC does not require fences or walls in the RAS4 zone, the zone in which the project site lies. The Proposed Project would not construct fences or walls fronting Manchester Avenue. The Proposed Project would be consistent with this policy.
Standard 12c: Chain-link fences and barbed wire are prohibited.	**Consistent.** Neither chain-link fences nor barbed wire would be included as part of the project design. Therefore, the Proposed Project would be consistent with this policy.
General Landscaping – Location and Materials	
Guideline 13: Create inviting spaces, provide shade within the public realm, screen unattractive areas, and enhance architectural detailing through the thoughtful and careful placement of landscaping. Pedestrian plazas, green space, pocket parks and open space shall be encouraged.	
Standard 13a: All areas of a site not occupied by buildings, driveways, or used for outdoor dining or other pedestrian uses should be landscaped and maintained.	**Consistent.** Areas of the project site not occupied by the proposed structure, driveways, or pedestrian uses would be landscaped. The Proposed Project includes approximately 35,159 square feet of landscaped area. Therefore, the Proposed Project would be consistent with this policy.
Standard 13b: Landscaping, such as planter boxes, is encouraged between the public street and the sidewalk. This landscaping serves as a buffer between pedestrians and vehicular traffic.	**Consistent.** The Proposed Project would include a landscaped buffer as well as pedestrian access along Manchester Avenue. Therefore, the Proposed Project would be consistent with this policy.

Table IV.G-3 (Continued)
Comparison of Proposed Loyola Village Community Design Overlay Design Guidelines and Standards to Proposed Project Characteristics

Design Guidelines and Standards	Consistency of the Proposed Project
Standard 13f: For new building projects, trees shall be planted along rear lot lines adjacent to residential parcels at a ratio of one tree for every 25 feet of lot width. At a minimum, these trees should be 24-inch box size with a trunk diameter of two inches and a height of 10 feet at the time of planting.	**Consistent.** The project site is bound, to the south, by single family residences. The Project Applicant would include trees along the rear lot lines adjacent to the residential uses as described under Standard 13f of the CDO. Therefore, the Proposed Project would be consistent with this policy.
Sustainable Building Design	
Guideline 22: Design projects to take advantage of natural systems and features – breezes, daylight, tree canopies – and to minimize the need for artificial lighting, cooling, and heating. Incorporate sustainable building elements into the overall form and aesthetic of projects.	
Standard 22e: Building and construction materials should [be of] recyclable, durable materials when possible.	**Consistent.** When possible, building and construction materials used will be of recyclable, durable materials. The Proposed Project would be consistent with this policy.
Standard 22f: New building roofs should either be "green roofs", contain landscaping or gardens, or be constructed or painted with heat reflective material.	**Consistent.** As no landscaping is proposed for the roof of the proposed structure, the roof will be constructed or painted with heat reflective material. The Proposed Project would be consistent with this policy.

* *This table lists only those policies that are applicable to the Proposed Project (i.e. policies relating to industrial or other land uses are not analyzed).*
Source: Loyola Village Community Design Overlay District, Adopted July 2009.
Source (table): Christopher A. Joseph & Associates, July 2009.

Los Angeles Coastal Transportation Corridor Specific Plan

As stated previously, the Los Angeles Coastal Transportation Corridor Specific Plan (Specific Plan) provides an outline for development within the Specific Plan Area to encourage alternate modes of transportation (i.e., bicycle, mass transit, etc.) as well as implementation of the Transportation Impact Assessment Fee which helps fund transportation infrastructure improvement. As the project site is located within the Specific Plan Area, development of the Proposed Project would be required to comply with any traffic mitigation measures or fees set forth by the Specific Plan. With implementation of required mitigation measures and/or payment of required fees, as determined by the Department of Transportation, potential impacts would be less than significant.

City of Los Angeles Planning and Zoning Code

Currently, the project site is designated [Q]C4-1-CDO on the western portion of the project site and [Q]RAS4-1-CDO on the eastern portion of the project site. As discussed previously, the Q conditions for the eastern (RAS4-1) portion of the project site were established pursuant to Ordinance No. 175,996, adopted May 19, 2004. The Q conditions for the western (C4-1) portion of the project site were established pursuant to Ordinance No. 175,981, adopted May 11, 2004, with the site as subarea 500. Additionally, included in the Discretionary Actions for the Proposed Project is a zone change that would

change the western portion of the project site from [Q]C4-1-CDO to (T)(Q)RAS4-1-CDO.[13] This zone change would designate the entire project site as (T)(Q)RAS4-1-CDO, which would include a new set of (T) and [Q] conditions to be implemented by the Proposed Project. Therefore, the Proposed Project would not be developed under the current split-zoning situation. As such, the following provides an analysis of the Proposed Project's compliance with the City's Planning and Zoning Code under the proposed zone change.

Permitted Uses

The Proposed Project involves the development of 260 residential units, including 16 joint live/work units. Pursuant to LAMC Section 12.16, the proposed residential and joint live/work uses are permitted within the RAS4 zone, as outlined in LAMC Section 12.11.5. These proposed uses are also permitted within the [Q]RAS4 zone as provided under the "Q" condition. Therefore, project impacts under the proposed zone change with respect to zoning consistency would be less than significant.

Setback Requirements

Within the RAS4 zone, front yard setbacks are required at a minimum depth of five feet; side and rear yard setbacks are also required at a minimum of five feet in width.[14] The Proposed Project would provide a seven foot front yard, a 15 foot side yard, and a seven foot rear yard setback plus the additional 28 feet for the existing rear access road. The seven foot front yard would be compliant with zoning standards as it would construct the 16 joint live/work uses two feet from the property line abutting the front yard (five feet required under the zoning code). Thus, the Proposed Project would exceed the required setbacks for front, side, and rear yards; therefore, no significant impact would occur.

Density Limitations

The proposed RAS4 classification allows for development of R4 uses on the project site. The Proposed Project would develop 260 residential units, including 16 joint live/work units, which would be permitted under development regulations of the R4 zone. The project site is also located in Height District 1, which typically permits a maximum floor area ratio (FAR) of 3:1 with no height limit in the RAS4 zone. The proposed 260 residential units, including 16 joint live/work units, would occupy 266,456 square feet and would be developed on a 131,943 square-foot lot. Thus, the FAR for the Proposed Project would be 2.02:1, which falls within the allowable 3:1 FAR.

Additionally, the RAS4 classification requires a minimum lot area of one unit per 400 square feet of lot area.[15] Applying the density limitation of the RAS4-1 zone to the 131,943 square-foot lot, the Proposed Project would be limited to constructing no more than 330 dwelling units. The Proposed Project would

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[13] *Under Ordinance No. 175,981 the project site is identified as subarea 500.*

[14] *LAMC § 12.11.5(C).*

[15] *LAMC § 12.11.5(C)(4).*

include 70 fewer units than the maximum density permitted in the RAS4-1 zone (see Table IV.G-4, Proposed Project Residential and Joint Live/Work Unit Summary). Therefore, the Proposed Project would be consistent with the density limitations and impacts would be less than significant.

Open Space

The Proposed Project would involve the development of 260 residential units, including 16 joint live/work units. Approximate open space requirements for the Proposed Project are provided in Table IV.G-5, Open Space Required and Proposed, per the LAMC plan requirements.

Table IV.G-4
Proposed Project Residential and Joint Live/Work Unit Summary

Use	Size (sf)	Total (units)
Residential and Joint Live/Work Units		
Studio	546	16
Studio	593	40
Studio + Mezzanine	702	2
1 BR	770	92
1 BR + Den	970	3
2 BR	1,022	65
2 BR + Den	1,222	8
2 BR	1,050	8
2 BR + Den	1,256	10
Live/Work	1,022	3
Live/Work + Mezzanine	910	1
Live/Work + Mezzanine	702	9
Live/Work Flat	770	2
Live/Work Flat	546	1
	Total	***260***

Source: Van Tilburg, Banvard, & Soderbergh, September 19, 2008.

Table IV.G-5
Open Space Required and Proposed

Size	Units	Rate (sf/du) [a]	Total Open Space (sf)
Open Space Required			
Residential			
1 bedroom	74	100	7,400
2 bedroom	95	125	11,875
3 bedroom	91	175	15,925
Total Open Space Required			**35,200**
Open Space Provided			
Private Open Space			1,400
Common Open Space			58,437
Total Open Space Provided			**59,837**

[a] *LAMC Section 12.21(G) sets forth a range of open space*

Table IV.G-5
Open Space Required and Proposed

requirements based on number of habitable rooms.
Source: Van Tilburg, Banvard & Soderbergh, AIA, Architecture Planning Interiors, March 26, 2008
Source (table): Christopher A. Joseph & Associates, November 2008.

As shown in Table IV.G-5, the Proposed Project would require approximately 35,200 square feet of open space based on an estimated average unit size. The Proposed Project would provide approximately 59,837 square feet of common open space, including 35,159 square feet of landscaped area, and approximately 1,400 square feet of private open space to include a multi-purpose room and gym area, as well as a swimming pool. The Proposed Project would also include landscaping along the perimeter of the project site. Therefore, the Proposed Project would have a less than significant impact with respect to the open space required as set forth in the LAMC.

Parking Requirements

As discussed in greater detail in Section IV.K, Traffic, Transportation, and Parking, the Proposed Project would require a total of approximately 407 resident parking spaces under the current LAMC regulations (see Figure III-2, Conceptual Site Plan, for an illustration of the project's parking layout). Therefore, the 475 parking spaces provided by the Proposed Project would provide more than adequate parking to meet the requirements under LAMC.

City of Los Angeles Sign Regulations

As described in Section IV.B. Aesthetics, the Proposed Project would incorporate project identity signs and address signs, which would be compliant with LAMC §§ 12.11.5-B.4 and 14.4.4-E. Furthermore, all signage would be subject to review by the appropriate City entities. Therefore, the Proposed Project would have less than significant impacts with regards to signage regulations and policies.

City of Los Angeles Planning Department Walkability Checklist

While the walkability guidelines addressed below in Table IV.G-6 are not mandatory and are not a part of the LAMC, incorporating them to the maximum extent feasible would create a more walkable environment and a higher quality of urban form for the Proposed Project. The following is an analysis of the Proposed Project's consistency with these guidelines.

Table IV.G-6
Walkability Checklist Applicable Guidelines

Guidelines	Evaluation of Project Consistency
Sidewalks[a]	
Create a continuous and predominantly straight sidewalk and open space.	**Consistent:** All sidewalks would be continuous and straight or relatively straight. Therefore, the Proposed Project would be consistent with this guideline.

Table IV.G-6 (Continued)
Walkability Checklist Applicable Guidelines

Guidelines	Evaluation of Project Consistency
Create a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (benches, newspaper racks, pedestrian information kiosks, bicycle racks, bus shelters, and pedestrian lighting).	**Consistent:** The Proposed Project would include a landscaped buffer along Manchester Avenue, thereby improving pedestrian safety and circulation. Therefore, the Proposed Project would be consistent with this guideline.
Provide adequate sidewalk width that accommodates pedestrian flow and activity yet is not wider than necessary.	**Consistent:** The width of sidewalks would meet, without exceeding, the standard width identified as necessary to accommodate pedestrians. Therefore, the Proposed Project would be consistent with this guideline.
Utilities	
Place utilities underground whenever possible.	**Consistent:** Utility equipment would be placed underground. Therefore, the Proposed Project would be consistent with this guideline.
Place utilities in the landscape areas and away from crosswalks or sidewalks.	**Consistent:** Utility equipment would be placed underground or in the specified zone. Utilities would not be located near crosswalks or sidewalks. Therefore, the Proposed Project would be consistent with this guideline.
Eliminate conflicts between utilities and access to building entrances.	**Consistent:** Utilities would be placed underground or in the specified zone. Utilities would not be located near or interfere with building entrances. Therefore, the Proposed Project would be consistent with this guideline.
Building Orientation	
Design grade level entrances from the public right-of-way for pedestrians.	**Consistent:** The Proposed Project would include 16 joint live/work units located on the ground level fronting Manchester Avenue, and would provide direct pedestrian access from Manchester Avenue. Therefore, the Proposed Project would be consistent with this guideline.
Create primary entrances for pedestrians that are easily accessible from transit stops, with as direct a path as possible to the transit stop.	**Consistent:** The Proposed Project would be developed adjacent to major thoroughfares with local bus lines, such as BBB Line 3, which has a stop at Lincoln Boulevard and Manchester Avenue (approximately 0.15 miles east of the project site). Direct pedestrian access to the joint live/work units located on the ground level would be provided from Manchester Avenue. Therefore, the Proposed Project would be consistent with this guideline.
Maintain at least one entrance from the public way at retail establishments with doors unlocked during regular business hours.	**Consistent:** As required by the building code, the retail component would maintain at least one entrance from the public way with doors unlocked during regular business hours. Therefore, the Proposed Project would be consistent with this guideline.
The main pedestrian entrance should be configured to be fully accessible per the ADA, such that an auxiliary approach for persons with mobility limitations (such as a ramp next to the main path to the primary entry) would not be necessary.	**Consistent:** As required by the building code, the Proposed Project's main pedestrian entrance would be configured to be fully accessible per the ADA. Therefore, the Proposed Project would be consistent with this guideline.
Provide direct access to building entrances from sidewalks and streets.	**Consistent:** The Proposed Project would include 16 joint live/work units located on the ground level fronting Manchester Avenue, and would provide direct pedestrian access from Manchester Avenue. Therefore, the Proposed Project would be consistent with this guideline.

Table IV.G-6 (Continued)
Walkability Checklist Applicable Guidelines

Guidelines	Evaluation of Project Consistency
Use architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall.	**Consistent:** The only breaks in building façade would be for access to and from the subterranean parking structure. Architectural features would be included into the building design to create continuity across the building façade. Therefore, the Proposed Project would be consistent with this guideline.
Off-Street Parking and Driveways	
Maintain continuity of the sidewalk.	**Consistent:** All sidewalks would be continuous and straight or relatively straight. Furthermore, vehicular access to the project site would be provided via existing driveways on Manchester Avenue and Rayford Drive. No new driveways would be constructed along Manchester Avenue, thereby minimizing the number of driveways providing access to and from the project site. Therefore, the Proposed Project would be consistent with this guideline.
Limit the width of each driveway to the minimum required.	**Consistent:** The width of driveways would meet and not exceed the standard width identified as necessary to accommodate vehicles. Therefore, the Proposed Project would be consistent with this guideline.
Illuminate all parking areas and pedestrian walkways.	**Consistent:** Pedestrian walkways from the parking structure and to the building entrances would be identifiable with the use of landscape and hardscape materials, lighting, and signage. All parking areas would be illuminated with adequate, uniform, and glare-free lighting. As described in Section IV.B.2 Aesthetics, lighting from the parking area would be focused on the project site. Therefore, the Proposed Project would be consistent with this guideline.
Use architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall.	**Consistent:** The only breaks in building façade would be for access to and from the subterranean parking structure. Architectural features would be included into the building design to create continuity and rhythm across the building façade. Therefore, the Proposed Project would be consistent with this guideline
Accommodate vehicle access to and from the site with as few driveways as possible.	**Consistent:** Vehicular access to the project site would be provided via existing driveways on Manchester Avenue and Rayford Drive. No new driveways would be constructed along Manchester Avenue, thereby minimizing the number of driveways providing access to and from the project site. Therefore, the Proposed Project would be consistent with this guideline.
On-Site Landscaping	
Provide canopy trees in planting areas in addition to the street trees.	**Consistent.** The Proposed Project would incorporate shaded landscape areas with canopy trees. Therefore, the Proposed Project would be consistent with this guideline.
Provide planting that complements pedestrian movement or views.	**Consistent.** The Proposed Project would provide a landscaped buffer along Manchester Avenue and throughout the project site along pedestrian pathways. Thus, landscaping would be designed to facilitate pedestrian movement where appropriate. Therefore, the Proposed Project would be consistent with this guideline.

Table IV.G-6 (Continued)
Walkability Checklist Applicable Guidelines

Guidelines	Evaluation of Project Consistency
Provide planting that complements the character of the built environment.	**Consistent.** Landscaping treatments would be used to provide separation between service areas and public zones, as well as to define edges throughout the varying elements of the Proposed Project. Therefore, the Proposed Project would be consistent with this guideline.
Building Façade	
Incorporate different textures, colors, materials, and distinctive architectural features that add visual interest.	**Consistent.** The building frontages would be designed in response to pedestrian scale with first floor setbacks where required. The façade of the structure would include variations in texture, color, architectural features, and massing, creating a distinctive and varied building façade. Therefore, the Proposed Project would be consistent with this guideline.
Add scale and interest to the building façade by articulated massing.	**Consistent.** The upper floors of the proposed structure would be differentiated from the ground floor by variations in setbacks, massing, and texture, creating a distinctive and varied building façade. Therefore, the Proposed Project would be consistent with this guideline.
Discourage blank walls. Architectural features, enhanced materials, fenestration, planting, lighting, and signage may contribute to a more pedestrian friendly streetscape.	**Consistent.** Where opaque walls are programmatically required, they would be designed with a variegated surface introducing texture through surface and light, planting landscaping, public art, and/or signage. Therefore, the Proposed Project would be consistent with this guideline.
Include overhead architectural features, such as awnings, canopies, trellises or cornice treatments that provide shade and reduce heat gain.	**Consistent.** Overhead architectural features and/or building setbacks and/or arcades would be provided adjacent to pedestrian ways and entries where appropriate, providing shade. Therefore, the Proposed Project would be consistent with this guideline.
Reinforce the existing façade rhythm along the street with architectural elements.	**Consistent:** The only breaks in building façade would be for access to and from the subterranean parking structure. Architectural features would be included into the building design to create continuity and rhythm across the building façade. Therefore, the Proposed Project would be consistent with this guideline.
Utilize the building wall for security between the structure and the street, eliminating the need for fences at the street.	**Consistent:** The Proposed Project would be built at the required setback along Manchester Avenue and Rayford Drive to create a strong street wall. No fences are proposed for the Project. Therefore, the Proposed Project would be consistent with this guideline.
Building Signage and Lighting	
Include signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to the building entrance.	**Consistent:** The Proposed Project would include pedestrian-scale way-finding signage to facilitate access to buildings and parking garage podiums. Pedestrian-scale way-finding signage would be placed on building façades and along pedestrian access routes. Therefore, the Proposed Project would be consistent with this guideline.
Provide adequate lighting levels to safely light the pedestrian path.	**Consistent:** The Proposed Project would include pedestrian-scale lighting to facilitate in the access of buildings and garage podiums. Pedestrian-scale lighting would be placed on building facades and along pedestrian access routes. Therefore, the Proposed Project would be

Table IV.G-6 (Continued)
Walkability Checklist Applicable Guidelines

Guidelines	Evaluation of Project Consistency
	consistent with this guideline.
Utilize adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage.	All parking areas would be illuminated with adequate, uniform, and glare-free lighting. As described in Section IV.B.2 Aesthetics, lighting from the parking area would be focused on the project site and would not create harsh shadows or result in light spillage onto adjacent uses. Therefore, the Proposed Project would be consistent with this guideline.

[a] *Special Note on terminology used in this section: The area containing the sidewalk is often described in terms of 3 "zones". The landscape/furniture zone plus curb is the area between the curb face and the front edge of the walkway. The pedestrian zone is the area of the sidewalk corridor that is specifically reserved for pedestrian travel. The frontage zone is the area between the pedestrian zone and the private property line, while not including any private property area. Every location may not have all three zones.*

Source: Walkability Checklist, City of Los Angeles Planning Department, November 2008 and Christopher A. Joseph & Associates, July 2009.

CUMULATIVE IMPACTS

Cumulative land use impacts could occur if other related projects in the vicinity of the project site would result in land use impacts in conjunction with the Proposed Project. A total of 19 proposed or approved projects were identified that could potentially contribute to the cumulative effects of the Proposed Project (as listed in Section II, Environmental Setting). Development of the Proposed Project, in conjunction with the related projects, would result in an intensification of existing prevailing land uses in the project vicinity. Specifically, Related Project Nos. 1 and 2 are the closest in proximity. These projects would be required to either generally conform to the zoning and land use designations for the project site or be subject to specific findings and conditions which are based on maintaining general conformance with the land use plans applicable to the area. As such, development of the Proposed Project and related projects is not anticipated to substantially conflict with the intent of the City's General Plan regarding the future development of the Westchester-Playa del Rey community, or with other land use regulations required to be consistent with the General Plan, such as the Planning and Zoning Code. Development of the Proposed Project, in conjunction with the identified related projects, would not be expected to result in cumulatively considerable effects with respect to land use regulations.

MITIGATION MEASURES

The applicant shall be required to comply with all applicable zoning requirements and to incorporate traffic modifications and/or pay any required fees set forth in the Coastal Transportation Corridor Specific Plan, as determined by the Department of Transportation. Compliance with these regulations will reduce project impacts to a less than significant level. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on land use compatibility and zoning would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
H. NOISE

INTRODUCTION

This section evaluates the potential for noise and groundborne vibration impacts resulting from implementation of the Proposed Project. This includes the potential for the Proposed Project to result in impacts associated with a substantial temporary and/or permanent increase in ambient noise levels in the vicinity of the project site; exposure of people in the vicinity of the project site to excessive noise levels, groundborne vibration, or groundborne noise levels; and whether this exposure is in excess of standards established in the local general plan or noise ordinance. Finally, mitigation measures intended to reduce impacts to noise and vibration are proposed, where appropriate, to avoid or reduce significant impacts of the Proposed Project.

Data used to prepare this analysis were obtained from the City of Los Angeles General Plan Noise Element, the City Municipal Code, and by measuring and modeling existing and future noise levels at the project site and the surrounding land uses. Traffic information contained in the traffic study prepared for the Proposed Project was used to prepare the noise modeling for vehicular sources.

ENVIRONMENTAL SETTING

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. Table IV.H-1, Representative Environmental Noise Levels, illustrates representative noise levels in the environment.

Table IV.H-1
Representative Environmental Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 100 feet		
	—100—	
Gas Lawnmower at 3 feet		
	—90—	
		Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing

Source: California Department of Transportation, 1998.

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

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

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

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

- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to

noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Community noise levels below 60 dBA CNEL are generally considered low, moderate levels are considered to be in the 60 to 70 dBA CNEL range, and high levels above 70 dBA CNEL. Examples of noise levels in urban residential or semi-commercial areas are typically 55 to 60 dBA CNEL, whereas commercial locations are typically 60 dBA CNEL. People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60 to 75 dBA CNEL) or dense urban or industrial areas (65 to 80 dBA CNEL).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors such as the weather and reflecting or barriers also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[1]

Fundamentals of Environmental Groundborne Vibration

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS)

[1] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

The general human response to different levels of groundborne vibration velocity levels is described in Table IV.H-2, Human Response to Different Levels of Groundborne Vibration.

Table IV.H-2
Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.	

Existing Conditions

Existing Ambient Daytime Noise Levels

The project site is located in a highly developed urban area in the Westchester-Playa Del Rey Community Plan Area within the City of Los Angeles, and is generally bounded by West Manchester Avenue to the north, Lincoln Boulevard to the east, Villanova Avenue to the South, and Rayford Drive to the west. Existing uses on the project site include three existing structures that contain eight separate commercial uses, including: two real estate offices; a health food store/acupuncture office; a Pilates/yoga studio; a gift shop; a karate/martial arts studio; an automotive service center; and an art supply store.

General land uses in the project vicinity include various commercial and multi-family uses. To the north of the project site, on the northeast corner of Manchester Avenue and Rayford Drive, is the Westchester Church-Nazarene. Several multi-family uses, a restaurant, and a commercial use are also located north of

the project site. Further northeast of the project site, on the northeast corner of Manchester Avenue and Lincoln Boulevard, are a restaurant, bar, liquor store, and bank. Immediately east of the project site is the Playa del Oro mixed-use development, which is currently under construction. Further east of the site, past the Playa del Oro development, is the Westchester Park and Recreation area, which contains a Senior Citizen Center, community swimming facilities, and a golf course. To the southeast of the project site are the 12-story Custom Hotel, a two-story parking structure, and several commercial uses including: a travel agency, art supply store, Ralph's Supermarket, bowling alley, diner, and retail store. Along the project site's southern edge are single-family homes and a residential community, south of which is the Loyola Village Elementary School located on the south side of Villanova Avenue. To the west of the project site are a single-family residential use and the Congregational Church of the Messiah and its associated surface parking.

To establish baseline noise conditions at nearby sensitive receptors within the vicinity of the project site, existing daytime noise levels were monitored at surrounding off-site locations where existing sensitive receptors are located, which includes the multi-family residential uses and Westchester Church-Nazarene to the north of the project site, the Custom Hotel to the southeast of the project site, the single-family residences and the Loyola Village Elementary School to the south of the project site, and the single-family residence and Congregational Church of the Messiah to the west of the project site. The noise survey was conducted using the Larson-Davis 831 precision noise meter, which meets and exceeds the minimum industry standard performance requirements for "Type 1" standard instruments as defined in the American National Standard Institute (ANSI) S1.4. Furthermore, this noise meter meets and exceeds the requirement specified in Section 111.01(l) of the City of Los Angeles Municipal Code (LAMC) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement site, the microphone was placed at a height of approximately five feet above the local grade.

At the noise measurement locations, listed in Table IV.H-3, Existing Daytime Noise Levels at Sensitive Off-site Locations, the sound level meter was programmed to record the average sound level (L_{eq}) over a cumulative period of 15 minutes, in accordance with Section 111.01(a) of the LAMC. Noise measurements were taken at the nearest sensitive receptors on each side of the project boundary to identify the representative noise levels at these sensitive receptors. The average noise levels and sources of noise monitored at these locations are shown in Table IV.H-3, with the locations identified in Figure IV.H-1, Noise Monitoring Locations.

Existing Roadway Noise Levels Off-Site

Existing roadway noise levels were calculated for 13 roadway segments located in proximity of the project site. The roadway segments selected for analysis are considered to be those that are expected to be most directly impacted by project-related traffic, which, for the purpose of this analysis, includes the roadways that are nearest to the project site that also run in front of the identified noise receptors. These roadways, when compared to roadways located further away from the project site, would experience the greatest percentage increase in traffic generated by the Proposed Project.

Table IV.H-3
Existing Daytime Noise Levels at Sensitive Off-site Locations

Noise Measurement Location	Primary Noise Sources	Noise Level Statistics		
		L_{eq}	L_{min}	L_{max}
1. Westchester Church-Nazarene and multi-family residential building located north of the project site.[a]	Traffic on Manchester Avenue; motor pump operating on Playa del Oro site; construction haul truck horns	66.1	48.8	80.0
2. Congregational Church of the Messiah located west of the project site, across Rayford Drive.	Traffic on Manchester Avenue; light traffic on Rayford Drive; commercial plane taking off from LAX	56.9	46.2	70.1
3. Single-family residence located west of the project site, across Rayford Drive.	Traffic on Rayford Drive and 87th Street; planes taking off from LAX; concrete truck entering/exiting project site	62.7	49.2	81.8
4. Single-family residence located immediately south of the project site.	Vehicles driving into project site; auto repair shop within the project site; wind blowing through trees; planes taking off from LAX; traffic on Rayford Drive	56.7	46.7	73.6
5. Loyola Village Elementary School building located south of the project site, across Villanova Avenue.	Planes taking off from LAX; traffic on 87th Street and Rayford Drive	59.9	45.0	73.2
6. Custom Hotel tower located southeast of the project site.	Construction activity on the Playa del Oro site (periodic drilling, hammering, and sawing activities); traffic inside vehicle circulation area for hotel; traffic on Lincoln; people talking outside of hotel	63.6	54.2	70.2

[a] *Due to the proximity of the church and multi-family residential buildings to the north of the project site, a single noise measurement was taken to represent to the existing daytime ambient noise level at these locations.*
Source: Christopher A Joseph & Associates, 2008. Noise measurement data are provided in Appendix G.

Calculation of the existing roadway noise levels was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the project traffic analysis. The 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.H-4, Existing (2008) Roadway Noise Levels Offsite.[2]

Existing Groundborne Vibration Levels

The only sources of groundborne vibration in the project site vicinity are heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on local roadways and automobile circulation

[2] *Table IV.H-4 indicates noise levels at 50 feet from the centerline of each roadway segment.*

Source: Google Earth Pro and Christopher A. Joseph & Associates, 2008.

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Figure IV.H-1
Noise Monitoring Locations

Table IV.H-4
Existing (2008) Roadway Noise Levels Off-site

Roadway	Roadway Segment	Existing Land Uses Located Along Roadway Segment	dBA CNEL [a]
Manchester Avenue	Between Stanmoor Drive and Rayford Drive	Residential/Commercial	64.8
	Between Rayford Drive and Lincoln Boulevard	Residential/Commercial	65.2
	Lincoln Boulevard and Loyola Boulevard	Residential	67.5
	Between Loyola Boulevard and Georgetown Avenue	Residential/Park	67.7
Rayford Drive	Between 83rd Street and 85th Street	Residential	53.7
	Between 85th Street and Manchester Avenue	Residential	55.0
Lincoln Boulevard	North of 83rd Street	Residential	71.3
	Between 83rd Street and Manchester Avenue	Commercial	70.4
	Between Manchester Avenue and Loyola Boulevard	Residential/Commercial	70.2
Loyola Boulevard	Between 85th Street and Manchester Avenue	Residential	58.6
83rd Street	Between Lincoln Boulevard and Colegio Drive	Residential	58.9
	Between Colegio Drive and Rayford Drive	Residential	58.7
	Between Rayford Drive and Stanmoor Drive	Residential	56.3

[a] *Values represent noise levels at 50 feet from the centerline of each roadway.*
Traffic Information Source: Crain & Associates, June 2008.
Table Source: Christopher A. Joseph & Associates, 2008. Calculation data and results are provided in Appendix G.

within parking structures. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB, and these levels could reach 72 VdB where trucks and buses pass over bumps in the road.[3] In terms of PPV levels, a heavy-duty vehicle traveling at a distance of 50 feet can result in a vibration level of approximately 0.001 inch per second.

Regulatory Framework

Federal

Noise Standards

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Proposed Project. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

[3] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

Vibration Standards

The Federal Transit Administration (FTA) has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. The vibration damage criteria adopted by the FTA are shown in Table IV.H-5, Construction Vibration Damage Criteria.

Table IV.H-5
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.	

In addition, the FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories: (1) Vibration Category 1 – High Sensitivity, (2) Vibration Category 2 – Residential, and (3) Vibration Category 3 – Institutional. The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

Under conditions where there are an infrequent number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 80 VdB for Category 2 buildings, and 83 VdB for Category 3 buildings.[4] Under conditions where there are an occasional number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 75 VdB for Category 2 buildings, and 78 VdB for Category 3 buildings.[5] No thresholds have been adopted or recommended for commercial and office uses.

[4] *"Infrequent events" is defined by the Federal Transit Administration as being fewer than 30 vibration events of the same kind per day.*

[5] *"Occasional events" is defined by the Federal Transit Administration as between 30 and 70 vibration events of the same source per day.*

State

Noise Standards

The California Department of Health Services has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown in Table IV.H-6, Community Noise Exposure (CNEL). In addition, Section 65302(f) of the California Government Code requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

Vibration Standards

There are no State vibration standards applicable to the Proposed Project. However, the California Department of Transportation (Caltrans) noted in its 2002 technical publication titled "Transportation Related Earthborne Vibrations (Caltrans Experiences)" that an upper PPV criterion level of 0.08 inch per

Table IV.H-6
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

Table IV.H-6
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]

[a] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*

[b] *Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.*

[c] *Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*

[d] *Clearly Unacceptable: New construction or development should generally not be undertaken.*

Source: Office of Noise Control, California Department of health Services (DHS); City of Los Angeles General Plan Noise Element, adopted February 1999.

second is recommended for continuous vibrations to which "ruins and ancient monuments" should be subjected.[6] This criterion level may also be used for historical buildings, or buildings that are in poor condition. For normal dwelling houses with plastered walls and ceilings, Caltrans indicates that a PPV criterion level of 0.20 inch per second is the threshold at which there is a risk of "architectural" damage.

Local

City of Los Angeles Noise Regulation

The City of Los Angeles has numerous ordinances and enforcement practices that apply to intrusive noise as well as ones that guide new construction. The City's comprehensive noise ordinance, found in Chapter XI of the City of Los Angeles Municipal Code (LAMC), sets forth sound measurement and criteria, minimum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance, and legal remedies for violations. Specific key provisions of Chapter XI of the LAMC are discussed below.

Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet from the source of the noise between the hours of 7:00 A.M. and 10:00 P.M. when the source is located within 500 feet of a residential zone:

- 75 dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines,

[6] *According to Caltrans' "Transportation Related Earthborne Vibrations (Caltrans Experiences)" publication, continuous vibrations refer to traffic, train, and most construction vibrations, with the exception of pile driving, blasting, and some other types of construction/demolition.*

off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

- 75 dB(A) for powered equipment of 20 horsepower or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools; or
- 65 dB(A) for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

However, the noise limitations above would not apply where compliance is deemed to be technically infeasible, which means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction device or techniques during the operation of the equipment. The aforementioned limitations apply only to uses in residential zones or within 500 feet thereof.

In accordance with the LAMC, a noise level increase of five decibels over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to: (1) radios, television sets, and similar devices defined in LAMC Section 112.01; (2) air conditioning, refrigeration, heating, pumping, filtering equipment defined in LAMC Section 112.02; (3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices defined in LAMC Section 112.04; and (4) motor vehicles driven onsite as defined in LAMC Section 114.02. These standards apply regardless of the off-site land use.

In addition, Section 41.40 of the 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 P.M. and 8 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

City of Los Angeles General Plan Noise Element

As discussed previously, 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.

The City's noise standards are correlated with land use zoning classifications 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 zone. The City has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the DHS for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the City's General

Plan Noise Element and the City of Los Angeles' *L.A. CEQA Thresholds Guide* in terms of the CNEL. Thus, the noise/land use compatibility guidelines for land uses within the City of Los Angeles are based on those presented in Table IV.H-6.

In accordance with the Noise Element of the City of Los Angeles General Plan, a noise exposure of up to 60 dB CNEL exposure is considered to be the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors, such as homes, schools, churches, libraries, etc. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dB CNEL for noise-sensitive uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dB CNEL are normally unacceptable for sensitive receptors except in unusual circumstances.

City of Los Angeles Groundborne Vibration Regulation

The City of Los Angeles has not adopted any thresholds for construction or operational groundborne vibration impacts. The Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inches per second RMS as a groundborne vibration threshold, which only applies to groundborne vibrations from long-term operational activities. The County of Los Angeles has not adopted any thresholds for construction-related groundborne vibration impacts.

ENVIRONMENTAL IMPACTS

Methodology

The primary sources of noise associated with the Proposed Project would be construction activities at the project site and project-related traffic volumes and new stationary sources (such as heating, ventilation, and air conditioning units) associated with operation of the proposed mixed-use development. 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.

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.

Construction Noise Levels

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 the existing residences surrounding the project site as well as the Loyola Village Elementary School located south of the project site and the church buildings located to the north and west of the project site. These noise levels are then analyzed against the construction noise standards established in the LAMC to determine whether an exceedance of allowable noise levels would occur at the off-site locations that are sensitive to noise.

Roadway Noise Levels

Roadway noise levels have been calculated for the study roadway segments near the project site based on information provided in the traffic report for the Proposed Project. The roadway segments selected for analysis are considered to be those that are expected to be most directly impacted by project-related traffic, which, for the purpose of this analysis, includes the roadways that are nearest to the project site that also run in front of the identified noise receptors. These roadways, when compared to roadways located further away from the project site, would experience the greatest percentage increase in traffic generated by the Proposed Project. The noise levels were calculated using the FHWA-RD-77-108 model and traffic volumes from the Proposed Project traffic analysis. 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 the State Department of Transportation (Caltrans).

Groundborne Vibration Associated with Construction Equipment

Groundborne vibration levels resulting from construction activities occurring within the project site were estimated by data published by Harris Miller Miller & Hanson Inc. for the Federal Transit Administration. Potential vibration levels resulting from construction of the Proposed Project are identified for off-site locations that are sensitive to vibration, including existing residences and churches.

Thresholds of Significance

In accordance with Appendix G to the *State CEQA Guidelines*, the project would have a significant impact on noise if it would cause any of the following conditions to occur:

(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;

(b) Exposure of persons 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 airstrip, exposure of people residing or working in the project area to excessive noise levels; and

(f) For a project within the vicinity of a private airstrip, exposure of people residing or working in the project area to excessive noise levels.

In accordance with Section 112.05 of the LAMC, construction related impacts would be significant if any powered equipment or powered hand tool produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from the noise source when the construction and industrial machinery is located within 500 feet of a residential zone. This noise standard is also used when analyzing construction noise impacts at the Loyola Village Elementary School, which is located south of the project site. Extending the provisions of LAMC Section 112.05 to apply to the Loyola Village Elementary School is done in recognition of the sensitivity of the school to increased noise levels and to provide a conservative analysis. Pursuant to the provisions of LAMC Section 112.05, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the 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. Non-compliance with the provisions of LAMC Section 112.05 would constitute a significant impact.

In addition, Section 41.40 of the 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. Thus, violations of these provisions of Section 41.40 of the LAMC by the Proposed Project would constitute a significant noise impact.

The *State CEQA Guidelines* do not define the levels at which groundborne vibration or groundborne noises are considered "excessive." Thus, in terms of construction-related vibration impacts on buildings, the adopted guidelines/recommendations by the FTA and Caltrans to limit groundborne vibration based on the age and/or condition of the structures that are located in close proximity to construction activity are used in this analysis to evaluate potential groundborne vibration impacts. As the PPV vibration standard of 0.08 inch per second recommended by Caltrans for historical buildings or buildings that are in poor condition is more stringent than the FTA's adopted criteria of 0.12 inch per second for buildings that are extremely susceptible to vibration damage, the Caltrans recommended standard will be used in this analysis for historic buildings. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; and

- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.08 inches per second at any historical building or building that is extremely susceptible to vibration damage.

In terms of groundborne vibration impacts associated with human annoyance, this analysis uses the FTA's vibration impact thresholds for sensitive buildings, residences, and institutional land uses under conditions where there are an infrequent number of events per day. These thresholds are 65 VdB at buildings where vibration would interfere with interior operations, 80 VdB at residences and buildings where people normally sleep, and 83 VdB at other institutional buildings.[7] The 65 VdB threshold applies to typical land uses where vibration would interfere with interior operations, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipments include, but are not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. The 80 VdB threshold applies to all residential land uses and any buildings where people sleep, such as hotels and hospitals. The 83 VdB threshold applies to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

In terms of operational noise generated by the Proposed Project, the City's noise standards are correlated with the type of land use (e.g., residential, commercial, etc.) in order to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds prescribed noise levels for different land use types. The noise/land use compatibility guidelines for land uses within the City of Los Angeles are presented in Table IV.H-4 of this document. Thus, operational-related noise impacts associated with the Proposed Project would be significant if operational noise levels exceed the City's noise guidelines for the identified off-site sensitive land uses.

In addition, operational-related noise generated by motor driven vehicles within the project site and mechanical equipment are also regulated under the LAMC. With regard to motor driven vehicles, Section 114.02 of the LAMC prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. With regard to the operation of mechanical equipment, Section 112.02 of the LAMC prohibits the operation of any air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, noise impacts associated with the Proposed Project would also be significant if the operational noise levels generated by on-site vehicular travel and rooftop mechanical equipment exceed these applicable LAMC provisions. Once again, in order to provide a conservative analysis, all of the above described LAMC provisions would also apply to the Loyola Village Elementary School.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on noise levels from construction if:

[7] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

Construction Noise

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than ten days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- 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.[8]

Operational Noise

With respect to operational noise, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category identified in Table IV.H-6 of this document, or any 5 dBA or greater noise increase.[9]

Airport Noise

With respect to airport-related noise, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dB CNEL and the project increases ambient noise levels by 1.5 dB CNEL or greater. It should be noted that this significance criteria applies only to projects that involve either the construction or expansion of an airport or heliport, and does not apply for non airport- or heliport-related projects. For the purpose of this analysis, however, a significant impact would occur if the Proposed Project would be located within the 65 dB CNEL noise contour of an existing airport.

Project Impacts

Construction Noise

Construction of the Proposed Project would require the use of heavy equipment for the demolition of the existing on-site structures, grading and excavation at the project site, installation of new utilities, paving, and building fabrication for the proposed mixed-use development. 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.

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[8] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.*

[9] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.2-3.*

The U.S. EPA has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the project site are presented in Table IV.H-7, Noise Range of Typical Construction Equipment, and Table IV.H-8, Typical Outdoor Construction Noise Levels, at a distance of 50 feet from the noise source (i.e., reference distance). The noise levels shown in Table IV.H-8 represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. These noise levels would diminish notably with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor.

Table IV.H-7
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet [a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Paver	85-88

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*
Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

During construction, three basic types of activities would be expected to occur and generate noise at the project site. One of these activities would involve the demolition of the existing structures on the project site. Another activity that would generate noise would be the grading and excavation activities at the project site to accommodate the proposed mixed-use building. The third type of construction activity that would generate noise would involve the physical construction of the new proposed building. Overall, construction activities associated with the Proposed Project would occur over a 24-month period, with construction expected to be complete by January 2013.

Table IV.H-8
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, 1971.

During construction of the Proposed Project, the nearest and most notable off-site sensitive receptors to the project site are the various single- and multi-family uses, church uses, and an elementary school that are located around the project site boundary. Specifically, the nearest off- and on-site noise sensitive receptors include the following:

- The multi-family uses and the Westchester Church-Nazarene located approximately 100 feet north of the project site, across Manchester Avenue;
- The Congregational Church of the Messiah located approximately 118 feet west of the project site, across Rayford Drive;
- The single-family uses located approximately 58 feet west of the project site, across Rayford Drive;
- The single-family uses located immediately adjacent to the project site's southern edge;
- The Loyola Village Elementary School located approximately 178 feet south of the project site, across Villanova Avenue;
- The Custom Hotel located approximately 740 feet southeast of the project site; and
- The multi-family uses of the Playa del Oro mixed-use development, which is currently under construction, located approximately 15 feet east of the project site.

Due to the use of construction equipment during the construction phase, the Proposed Project would expose these surrounding off-site sensitive receptors to increased ambient exterior noise levels. As shown in Table IV.H-8, outdoor noise levels at noise-sensitive receptors 50 feet from the noise source could range from 77 dBA to 86 dBA L_{eq} with the use of noise-attenuating devices. Table IV.H-9, Exterior Noise at Off-site Sensitive Uses from Project Construction, shows the peak construction noise levels that would occur at the off-site sensitive uses during construction at the project site compared to the existing daytime ambient noise levels at these sensitive uses.

Table IV.H-9
Exterior Noise at Off-site Sensitive Uses From Project Construction

Off-site Sensitive Land Uses	Location	Approximate Distance to Project Site Boundary (ft.)	Existing Monitored Daytime Ambient Noise Levels (dBA L_{eq})	Estimated Peak Construction Noise Levels (dBA L_{eq})	Noise Level Increase (dBA L_{eq})
Multi-family residential uses and the Westchester Church-Nazarene	North of project site, across Manchester Avenue	100	66.1	80.0	13.9
Congregational Church of the Messiah	West of project site, across Rayford Drive	118	56.9	78.5	21.6
Single-family residential uses	West of project site, across Rayford Drive	58	62.7	84.7	22.0
Single-family residential uses	Immediately south of project site	5	56.7	106.0	49.3
Loyola Village Elementary School	South of project site, across Villanova Avenue	178	59.9	75.0	15.1
Custom Hotel	Southeast of project site	740	63.6	62.6	Project noise levels inaudible since less than ambient levels)
Multi-family residential uses of the proposed Playa del Oro project (currently under construction)	East of project site	15	56.7 [a]	96.5	39.8

[a] *As the Playa del Oro project is currently under construction, existing ambient daytime noise readings at this off-site location could not be made. For the purpose of this analysis, the ambient noise level of the existing single-family residential uses located immediately south of the project site is used to represent the ambient noise level for this off-site sensitive receptor due to their proximity to each other.*

Source: Christopher A Joseph & Associates, July 2008; Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.

As shown in Table IV.H-9, the peak construction noise levels experienced by the off-site sensitive receptors would range from approximately 62.6 dBA L_{eq} at the Custom Hotel located southeast of the project site to approximately 106 dBA L_{eq} at the single-family residential uses located immediately south of the project site, with the use of mufflers on the construction equipment. Thus, with the exception of the Custom Hotel located southeast of the project site, construction activities associated with the Proposed Project would generate episodic noise levels well above the ambient noise levels currently experienced in the remaining noise-sensitive receptors surrounding the project site. It should be noted, however, that the increase in noise levels at the off-site locations during construction at the project site would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. Additionally, while the estimated construction noise levels at each of the off-site locations would be the loudest when construction activities are occurring at an area

within the project site that is nearest to the off-site location, the majority of the time noise levels at these off-site locations would be reduced as construction activities conclude or move to another more distant location of the project site. Thus, the highest noise levels that would be experienced by the off-site receptors shown in Table IV.H-9 would only occur for a limited duration during construction of the Proposed Project. Nonetheless, the typical construction noise levels associated with the Proposed Project would exceed 75 dBA at 50 feet from the noise source within the project site.

Based on criteria set forth in the *L.A. CEQA Threshold Guide*, construction activities lasting more than one day, which would increase ambient exterior noise levels by 10 dBA or more at a noise-sensitive use, would normally result in a significant impact. In addition, the *L.A. CEQA Threshold Guide* also states that construction activities lasting more than 10 days in a three month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact. As shown in Table IV.H-9, with the exception of the Custom Hotel, an increase in ambient exterior noise levels by 10 dBA or more would occur at all of the identified off-site sensitive receptors. Thus, potentially significant short-term noise impacts from construction would occur at these sensitive off-site locations.

As discussed previously under Regulatory Framework, Section 41.40 of the LAMC regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. In terms of construction noise, Section 112.05 of the LAMC limits the operation of powered equipment and powered hand tools to between the hours of 7:00 A.M. to 10:00 P.M., and prohibits the noise levels generated by construction machinery from exceeding 75 dBA at 50 feet from the noise source when located within 500 feet of a residential zone. However, according to Section 112.05 of the LAMC, the noise limitation of 75 dBA does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. It has been the City's standard practice to exempt construction projects from the City's noise standards as long as these projects conform to Sections 41.40 and 112.05 of the LAMC, including operating within the permissible hours and days of the week.

The construction activities associated with the Proposed Project would comply with the noise regulations established in Sections 41.40 and 112.05 of the LAMC. As shown in Table IV.H-9, noise levels from construction activities at the project site would exceed 75 dBA at 50 feet from the project site. However, implementation of Mitigation Measures H-1 through H-9, which would require the implementation of noise reduction devices and techniques during construction at the project site, would serve to reduce the noise levels associated with construction of the Proposed Project to the maximum extent feasible. Thus, the Proposed Project would be in compliance with the City's Code with respect to construction, and would not violate the noise standards established in the LAMC. Nevertheless, because construction noise levels associated with the Proposed Project are likely to exceed the existing ambient noise levels at all of the identified off-site sensitive locations, with the exception of the Custom Hotel, by more than 5 dBA for more than ten days in a three-month period and by more than 10 dBA for more than one day, construction

activities associated with the Proposed Project would generate a substantial temporary or periodic increase in ambient noise levels in the project vicinity and these construction noise impacts would be significant and unavoidable. As the Custom Hotel would not experience an increase in ambient noise levels due to construction of the Proposed Project, noise impacts at this off-site sensitive receptor during construction at the project site would be less than significant.

Construction-Related Groundborne Vibration

Construction activities that would occur within the project site would include demolition as well as grading and excavation, which would have the potential to generate low levels of groundborne vibration. Table IV.H-10, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate during the construction of the Proposed Project. Based on the information presented in Table IV.H-10, vibration velocities could reach as high as approximately 0.089 inches per second PPV at 25 feet from the source activity, depending on the type of construction equipment in use. This corresponds to a RMS velocity level (in VdB) of 87 VdB at 25 feet from the source activity.

Table IV.H-10
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration 2006; and Christopher A. Joseph & Associates 2008.

As discussed previously, construction activities would have the potential to impact the nearest surrounding off-site sensitive receptors to the project site as well as existing on-site sensitive receptors, which include the following:

- The multi-family uses and the Westchester Church-Nazarene located approximately 100 feet north of the project site, across Manchester Avenue;
- The Congregational Church of the Messiah located approximately 118 feet west of the project site, across Rayford Drive;
- The single-family uses located approximately 58 feet west of the project site, across Rayford Drive;

- The single-family uses located immediately adjacent to the project site's southern edge;
- The Loyola Village Elementary School located approximately 178 feet south of the project site, across Villanova Avenue;
- The Custom Hotel located approximately 740 feet southeast of the project site; and
- The multi-family uses of the Playa del Oro mixed-use development, which is currently under construction, located approximately 15 feet east of the project site.

Table IV.H-11, Groundborne Vibration Levels at Off-site and On-site Sensitive Uses from Project Construction, shows the construction-related groundborne vibration levels that would occur at the identified off-site and on-site sensitive uses during construction at the project site.

Table IV.H-11
Groundborne Vibration Levels at Off-site Sensitive Uses From Project Construction

Off-site Sensitive Land Use	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Estimated Peak Construction-Related Groundborne Vibration Levels (VdB)
Multi-family residential uses and the Westchester Church-Nazarene located north of project site, across Manchester Avenue.	100	0.011	68.9
Congregational Church of the Messiah located west of the project site, across Rayford Drive.	118	0.009	66.8
Single-family residential uses located west of the project site, across Rayford Drive	58	0.025	76.0
Single-family residential uses located immediately south of project site.	5	0.995	108.0
Loyola Village Elementary School located south of project site, across Villanova Avenue.	178	0.005	61.4
Custom Hotel located southeast of the project site.	740	0.0006	42.9
Multi-family residential uses of the proposed Playa del Oro project (currently under construction) located immediately east of the project site.	15	0.191	93.7

Source: Christopher A Joseph & Associates, July 2008; Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.

As shown in Table IV.H-11, the vibration velocities forecasted to occur at the off-site sensitive receptors would range from 0.0006 PPV at the Custom Hotel located southeast of the project site to 0.995 PPV at

the single-family residential buildings located immediately south of the project site. None of the buildings at the identified off-site sensitive use locations are considered to be "fragile" structures, such as historical buildings or buildings that are extremely susceptible to vibration damage. For the purpose of this analysis, the surrounding off-site sensitive receptors such as the single-family and multi-family residential buildings, church buildings, and the Loyola Village Elementary School classrooms are considered to be "non-engineered timber and masonry buildings." Based on the information shown in Table IV.H-11, only the single-family residences located immediately south of the project site could be exposed to PPV groundborne vibration levels that exceed 0.2 inches per second during construction of the Proposed Project, while the remaining off-site sensitive receptor locations would not be exposed to PPV groundborne vibration levels that exceed this threshold. Thus, in terms of building damage, a potentially significant impact associated with groundborne vibration would occur at the single-family residences located south of the project site, while a less-than-significant impact would occur at the remaining identified sensitive receptors.

In terms of human annoyance, the vibration levels forecasted to occur at the off-site sensitive receptors would range from 42.9 VdB at the Custom Hotel located southeast of the project site to 108 VdB at the single-family residences located immediately south of the project site. Because the vibration levels experienced at the proposed multi-family residential buildings associated with the Playa del Oro project that is currently under construction and the single-family residences located south of the project site would exceed the FTA's threshold of 80 VdB for residences, the vibration impact at these off-site sensitive uses would be potentially significant. The vibration impact at the remaining off-site residential uses would be less than significant. In addition, because the vibration levels experienced at the off-site church buildings to the north and west of the project site as well as the Loyola Village Elementary School classroom buildings to the south of the project site, across Villanova Avenue, would not exceed the FTA's threshold of 83 VdB for institutional uses, which applies to schools and churches, impacts associated with construction-related vibration would be less than significant.

It should be noted that the construction activities associated with the Proposed Project would be required to comply with Section 41.40 of the LAMC, which prohibits exterior demolition and construction activities 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. Thus, in terms of construction-related vibration impacts at the off-site single-family residences to the south and the new multi-family residential uses to the west of the project site, none of the construction activities associated with the Proposed Project would occur during recognized sleep hours.

Operational Noise

Traffic Noise

The increase in traffic resulting from implementation of the Proposed Project would increase the ambient noise levels at sensitive off-site locations in the project vicinity. These concerns were addressed using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108), which calculates the CNEL noise level for a particular reference set of input conditions, based on site-specific traffic volumes, distances,

speeds and/or noise barriers. Based on the traffic report prepared for the Proposed Project, included as Appendix G to this Draft EIR, in combination with an analysis of the surrounding land uses, roadway noise levels were forecasted to determine if the Proposed Project's vehicular traffic would result in a significant impact at off-site, noise-sensitive receptor locations.

Off-site locations in the project vicinity would experience a slight increase in noise resulting from the additional traffic generated by the Proposed Project. The increases in noise levels at selected roadway segments located in close proximity to the project site are identified in Table IV.H-12, Predicted Future Roadway Noise Levels Off-site. Table IV.H-12 identifies the changes in future noise levels along the study-area roadway segments in the project vicinity.

Table IV.H-12
Predicted Future Roadway Noise Levels Off-site

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Noise Levels in dBA CNEL				
		Future (2012) Without Project	Future (2012) With Project	Increase	Significance Threshold [a]	Significant?
Manchester Avenue, between Stanmoor Dr. and Rayford Dr.	Residential & Commercial	65.8	65.8	0.0	5.0	No
Manchester Avenue, between Rayford Dr. and Lincoln Blvd.	Residential	67.3	67.3	0.0	5.0	No
Manchester Avenue, between Lincoln Blvd. and Loyola Blvd.	Residential	68.3	68.3	0.0	5.0	No
Manchester Avenue, between Loyola Blvd. and Georgetown Ave.	Residential & Park	68.5	68.5	0.0	5.0	No
Rayford Drive, between 83rd St. and 85th St.	Residential	54.2	54.2	0.0	5.0	No
Rayford Drive, between 85th St. and Manchester Ave.	Residential	55.5	55.5	0.0	5.0	No
Lincoln Boulevard, north of 83rd St.	Residential	73.1	73.1	0.0	3.0	No
Lincoln Boulevard, between 83rd St. and Manchester Ave.	Commercial	72.3	72.3	0.0	5.0	No
Lincoln Boulevard, between Manchester Ave. and Loyola Blvd.	Residential & Commercial	71.8	71.8	0.0	3.0	No
Loyola Boulevard, between 85th St. and Manchester Ave.	Residential	59.0	59.0	0.0	5.0	No
83rd Street, between Lincoln Blvd. and Colegio Dr.	Residential	59.9	59.9	0.0	5.0	No
83rd Street, between Colegio Dr. and Rayford Dr.	Residential	59.1	59.1	0.0	5.0	No
83rd Street, between Rayford Dr. and Stanmoor Dr.	Residential	56.7	56.7	0.0	5.0	No

[a] *A project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally*

Table IV.H-12
Predicted Future Roadway Noise Levels Off-site

unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table IV.H-4, Community Noise Exposure (CNEL)). Thus, for the purpose of analysis, the significance threshold is 3 dBA if the noise increase resulting from the Proposed Project would meet or exceed the City's 70 dBA CNEL noise level standard at residential uses and park uses, and 77 dBA CNEL noise level standard at commercial uses, which are still within the "conditionally acceptable" noise category for the three land uses, while the significance threshold is 5 dBA if the noise increase would be below the City's 70 dBA CNEL noise level standard for residential uses and park uses, and 77 dBA CNEL noise level standard for commercial uses. Along roadway segments that have residential, park, and commercial uses, the noise level standard for residential uses was used, which would allow for a conservative analysis.

Traffic Information Source: Crain & Associates, September 2008.

Table Source: Christopher A. Joseph & Associates, 2008. Calculation data and results are provided in Appendix G.

As shown in Table IV.H-12, the Proposed Project would not increase local noise levels at any of the analyzed roadway segments that are located in proximity to the project site, and thus would not exceed the identified thresholds of significance. 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 dBA and 5 dBA CNEL thresholds established under the *L.A. CEQA Thresholds Guide*, this impact would be less than significant. In addition, as the other roadway segments that are located even further away from the project site would experience less traffic increases due to the Proposed Project, the increase in local noise levels at these roadway segments would also not exceed the identified thresholds of significance, and impacts would be less than significant.

On-site Non-Vehicular Noise

The Proposed Project would involve the construction of a mixed-use building at the project site. As part of the Proposed Project, new rooftop mechanical equipment and heating, ventilation, and air conditioning (HVAC) units and exhaust fans may be installed on the proposed mixed-use building. The noise levels generated by these new HVAC units and exhaust fans could potentially disturb the existing single-family and multi-family residential uses as well as the proposed multi-family residential buildings associated with the Playa del Oro project located offsite. However, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 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 five decibels. Thus, the 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. In addition, nighttime noise limits would be applicable to any equipment items required to operate between the hours of 10:00 p.m. and 7:00 a.m. As such, this impact would be less than significant. Nonetheless, Mitigation Measure H-12 is recommended to ensure that all new mechanical equipment associated with the Proposed Project would adhere to Section 112.02 of the City Municipal Code.

In order to ensure that on-site operational noise would not adversely affect the future residents at the project site, Mitigation Measure H-13 would be implemented to ensure that all exterior windows associated with the proposed residential uses would be constructed such that sufficient sound insulation is provided to ensure that interior noise levels would be below a CNEL of 45 dBA in any residential unit.

Parking Facility Noise

Noise would be generated by activities within the three levels of parking that would be constructed beneath the residential building. Parking would be provided in two above-ground levels and one subterranean level. As the subterranean parking level would be fully enclosed on all sides, noise generated at this level would not affect the existing off-site sensitive receptors located adjacent to the project site. However, the noise generated at the two above-ground parking levels may potentially affect the adjacent off-site sensitive receptors. As discussed previously, operational-related noise generated by motor driven vehicles within the project site are regulated under the LAMC. Specifically, with regard to motor driven vehicles, Section 114.02 of the LAMC prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels.

Sources of noise within the parking levels would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking garage would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the project site. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 56 dBA L_{eq} (1-hour) at a distance of 50 feet, while car alarm and horn events, which would occur less frequently, would generate maximum noise levels as high as 49 dBA L_{eq} (1-hour) at a distance of 50 feet. Overall, a composite noise level of 60 dBA L_{eq} (1-hour) at a distance of 50 feet is typically associated with parking structures.[10]

The nearest off-site sensitive receptors that may be affected by noise associated with the proposed parking levels are the proposed multi-family residential uses located west of the project site, which are part of the Playa del Oro project, and the single-family residences located immediately south of the project site. As both of these off-site sensitive uses would be located within 50 feet of the proposed parking levels, the noise levels experienced by these off-site sensitive uses may exceed 60 dBA L_{eq} (1-hour). Given that the existing daytime ambient noise level that was measured at the single-family residences to the south of the project site was approximately 56.7 dBA L_{eq}, it is likely that the noise levels generated by the proposed above-ground parking levels would exceed the 5 dBA significance criterion at these sensitive receptors.[11] Thus, a potentially significant impact would occur.

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[10] *PCR Services Corporation, The Grand Avenue Project Draft Environmental Impact Report, June 2006.*

[11] *As the Playa del Oro project is currently under construction, existing ambient daytime noise readings at this off-site location could not be made. For the purpose of this analysis, the ambient noise level of the existing*

Airport Noise

The project site is located approximately 0.5 miles north of the Los Angeles International Airport (LAX). LAX is the world's fifth busiest passenger airport and ranks 12th in air cargo tonnage handled. As indicated in the Los Angeles County Airport Land Use Plan (ALUP), the project site is generally located northwest of the airport's planning boundary. Based on the City's Land Use Compatibility Guidelines, which are shown in Table IV.H-6, the range for normally acceptable exterior noise level for multi-family residential uses is 50-65 dBA CNEL, while the range for conditionally acceptable exterior noise level for multi-family residential uses is 60-70 dBA CNEL. According to the ALUP, generally at 65 CNEL level 33 percent of those exposed would be highly annoyed and five percent would actually complain.[12] However, according to the ALUP noise contour for LAX, the location of the project site is beyond the 65 dBA CNEL contour of the airport. Thus, as the Proposed Project is located beyond the airport's 65 dBA CNEL noise impact contour, residents at the project site would not be exposed to potentially excessive noise levels associated with the airport. This impact would be less than significant.

Aside from LAX, the Proposed Project is not located in the vicinity of any private airstrips. The nearest private airstrip to the project site is the Agua Dulce Airpark, located approximately 38 miles north of the project site. Therefore, no impact with respect to the exposure of persons to excessive airstrip noise levels would occur.

Operational Vibration

The Proposed Project, as a mixed-use development, would not include stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the project site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on the nearby local roadways, the proposed residential uses at the project site would not be a land use that attracts any of these heavy-duty vehicles. While refuse trucks would be used for the disposal of solid waste at the project site, these trips would typically only occur once a week and would not be any different than those presently occurring at the project site for the existing commercial uses. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

CUMULATIVE IMPACTS

This cumulative impact analysis considers development of the Proposed Project in combination with ambient growth and other development projects within the vicinity of the Proposed Project. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only

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single-family residential uses located immediately south of the project site is used to represent the ambient noise level for this off-site sensitive receptor due to their proximity to each other.

[12] *Department of Regional Planning, Los Angeles County Airport Land Use Plan, December 1991.*

projects and ambient growth in the nearby area could combine with the Proposed Project to result in cumulative noise impacts.

Development of the Proposed Project in combination with the related projects would result in an increase in construction-related and traffic-related noise in this already urbanized area of the City. However, each of the related projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. In addition, each of the related projects would be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. With conformance with LAMC Sections 41.40 and 112.05, the cumulative construction noise impact would be less than significant.

Future construction associated with the related projects could result in a cumulatively significant impact with respect to temporary or periodic increases in ambient noise levels. Construction noise is localized in nature and decreases substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise levels, more than one source emitting high levels of construction noise would need to be in close proximity to the Proposed Project. As shown in Figure IV.K-7, Related Projects Location Map, the nearest related projects to the project site are the proposed bank development at 7515 West Manchester Avenue, which is located approximately 430 feet east of the project site, and the Playa del Oro mixed use development, which is located adjacent to the project site. Due to the proximity of these related projects to the project site, a significant cumulative impact associated with a temporary or periodic increase in ambient noise levels could occur if construction activities at these related project sites occur at the same time as construction for the Proposed Project. Although construction of the Playa del Oro mixed use development, which is currently under construction, would likely be built prior to the commencement of construction for the Proposed Project, it is not known at this time whether or not construction activities for the proposed bank development at 7515 West Manchester Avenue would overlap with construction activities at the project site. However, for the purpose of conducting a conservative analysis, this potential scenario where construction activities at both these sites may overlap with each other is assumed. Thus, this could be a potentially significant and unavoidable cumulative impact. As discussed previously, construction activities associated with the Proposed Project would only occur during the permitted hours designated in Section 41.40 of the LAMC and, thus, would not occur during recognized sleep hours for residences or on days that residents are most sensitive to exterior noise. While implementation of Mitigation Measures H-1 through H-9 would serve to reduce the noise levels associated with construction at the project site, construction noise levels exceeding the thresholds in the *L.A. CEQA Threshold Guide* can still be expected. Therefore, the cumulative impact of the Proposed Project would be significant and unavoidable.

Cumulative development in the City may result in the exposure of people to or the generation of excessive groundborne vibration. As mentioned above, the nearest related projects to the Proposed Project are the proposed bank development located at 7515 West Manchester Avenue and the Playa del Oro mixed use project located adjacent to the project site to the east. Due to the proximity of these two related projects to the project site, construction-related activities at these two locations along with

construction at the project site could expose nearby sensitive receptors to excessive groundborne vibration levels if construction occurs at the same time. Although construction of the Playa del Oro mixed use development, which is currently under construction, would likely be built prior to the commencement of construction for the Proposed Project, it is not known at this time whether or not construction activities for the proposed bank development would occur at the same time as that of the Proposed Project. However, for the purpose of conducting a conservative analysis, this potential scenario where construction activities would overlap at these two sites is assumed. Thus, this could be a potentially significant and unavoidable cumulative impact. Because implementation of Mitigation Measures H-3 and H-11 would serve to reduce the vibration levels associated with construction at the project site to a less-than-significant level, the contribution of the Proposed Project to this cumulative impact would be less than significant.

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 study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the Proposed Project to the future year 2012 cumulative base traffic volumes on the roadway segments in the project vicinity. The noise levels associated with existing traffic volumes and cumulative base traffic volumes with the Proposed Project (i.e., future cumulative traffic volumes) are identified in Table IV.H-13, Cumulative Project Roadway Noise Impacts with Proposed Project. As shown, cumulative development along with the Proposed Project would increase local noise levels by a maximum of 2.1 dBA CNEL at the roadway segment of Manchester Avenue, between Rayford Drive and Lincoln Boulevard. As the increase in roadway noise would not exceed 5.0 dBA CNEL at any of the study roadway segments, the noise increase would not be substantial. Therefore, the cumulative impact associated with mobile source noise would be less than significant.

Table IV.H-13
Cumulative Project Roadway Noise Impacts with Proposed Project

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Noise Levels in dBA CNEL				
		Existing (2008) Traffic Volumes	Future (2012) With Project Traffic Volumes	Cumulative Increase	Significance Threshold [a]	Significant?
Manchester Avenue, between Stanmoor Dr. and Rayford Dr.	Residential & Commercial	64.8	65.8	1.0	5.0	No
Manchester Avenue, between Rayford Dr. and Lincoln Blvd.	Residential	65.2	67.3	2.1	5.0	No
Manchester Avenue, between Lincoln Blvd. and Loyola Blvd.	Residential	67.5	68.3	0.8	5.0	No
Manchester Avenue, between Loyola Blvd. and Georgetown Ave.	Residential & Park	67.7	68.5	0.8	5.0	No
Rayford Drive, between 83rd St. and 85th St.	Residential	53.7	54.2	0.5	5.0	No

Table IV.H-13
Cumulative Project Roadway Noise Impacts with Proposed Project

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Noise Levels in dBA CNEL				
		Existing (2008) Traffic Volumes	Future (2012) With Project Traffic Volumes	Cumulative Increase	Significance Threshold [a]	Significant?
Rayford Drive, between 85th St. and Manchester Ave.	Residential	55.0	55.5	0.5	5.0	No
Lincoln Boulevard, north of 83rd St.	Residential	71.3	73.1	1.8	3.0	No
Lincoln Boulevard, between 83rd St. and Manchester Ave.	Commercial	70.4	72.3	1.9	5.0	No
Lincoln Boulevard, between Manchester Ave. and Loyola Blvd.	Residential & Commercial	70.2	71.8	1.6	3.0	No
Loyola Boulevard, between 85th St. and Manchester Ave.	Residential	58.6	59.0	0.4	5.0	No
83rd Street, between Lincoln Blvd. and Colegio Dr.	Residential	58.9	59.9	1.0	5.0	No
83rd Street, between Colegio Dr. and Rayford Dr.	Residential	58.7	59.1	0.4	5.0	No
83rd Street, between Rayford Dr. and Stanmoor Dr.	Residential	56.3	56.7	0.4	5.0	No

[a] *A project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table IV.H-4, Community Noise Exposure (CNEL)). Thus, for the purpose of analysis, the significance threshold is 3 dBA if the noise increase resulting from the Proposed Project would meet or exceed the City's 70 dBA CNEL noise level standard at residential uses and park uses, and 77 dBA CNEL noise level standard at commercial uses, which are still within the "conditionally acceptable" noise category for the three land uses, while the significance threshold is 5 dBA if the noise increase would be below the City's 70 dBA CNEL noise level standard for residential uses and park uses, and 77 dBA CNEL noise level standard for commercial uses. Along roadway segments that have residential, park, and commercial uses, the noise level standard for residential uses was used, which would allow for a conservative analysis.*

Traffic Information Source: Crain & Associates, September 2008.

Table Source: Christopher A. Joseph & Associates, 2008. Calculation data and results are provided in Appendix G.

MITIGATION MEASURES

No measures are available to reduce the significant and unavoidable construction noise impacts related to the Proposed Project below a level of significance. However, the City requires implementation of the following standard measures to mitigate noise impacts as much as feasible:

Construction Noise

H-1. The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

H-2. Construction and demolition shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday, and prohibited on all Sundays and federal holidays.

H-3. Noise and groundborne vibration construction activities whose specific location on the project 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.

H-4. Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

H-5. 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.

H-6. The project contractor shall use power construction equipment with state-of-the-are noise shielding and muffling devices.

H-7. Barriers such as plywood structures or flexible sound control curtains shall be erected between the Proposed Project and the existing single-family residences to the south as well as the proposed multi-family residential uses associated with the Playa del Oro project to the west to minimize the amount of noise to the maximum extent feasible during construction.

H-8. 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.

H-9. 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 and approved by the City's Department of Building and Safety.

H-10. Two weeks prior to the commencement of construction at the project site, notification must be provided to the immediate surrounding off-site residential and church that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

Construction Vibration

H-11 The operation of construction equipment that generates high levels of vibration, such as large bulldozers, loaded trucks, and jackhammers, shall be prohibited within 45 feet of the existing off-site single-family residences and proposed multi-family residential buildings located immediately south and east of the project site boundary, respectively, during project construction. Instead, small rubber-tired bulldozers shall be used within this area during demolition, grading, and site preparation operations.

Operational Noise

H-12. All new mechanical equipment associated with the Proposed Project shall comply with Section 112.02 of the City of 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.

H-13 All exterior windows associated with the proposed residential uses at the project site shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

H-14 The side of the proposed parking structure facing the existing single-family residences to the south of the project site and the proposed multi-family residential uses associated with the Playa del Oro development to the east of the project site shall be fully enclosed. As an alternative, the Proposed Project Applicant may submit evidence to the City's Department of Building and Safety of an alternative design that does not fully enclose the portions of the parking structure facing the single-family residences to the south and the multi-family residential uses to the east, and that achieves noise attenuation such that noise levels from the parking structure would not exceed 61.7 dBA at the project site's property line adjoining the single-family residences to the south and the multi-family residential uses to the west.[13]

[13] *The performance noise level of 61.7 dBA is determined based on the existing ambient daytime noise level that was measured at the single-family residences to the south of the project site and the prohibition under Section 114.02 of the LAMC for the operation of any motor driven vehicles upon any property within the City to exceed the ambient noise level on the premises of any occupied residential property by more than five decibels*

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With compliance with Section 41.40 of the LAMC and the implementation of the Mitigation Measures H-1 through H-9 listed above, which would require the implementation of noise reduction devices and techniques during construction at the project site, construction-related noise impacts associated with the Proposed Project would be reduced to the maximum extent feasible. Nevertheless, because construction noise levels are likely to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period and by more than 10 dBA for more than one day, construction noise impacts would be significant and unavoidable.

In terms of building damage, the construction-related vibration impacts associated with the Proposed Project would be potentially significant at the single-family residential uses located immediately south of the project site. In terms of human annoyance, the vibration levels experienced at the single-family family residential uses located immediately south of the project site and the proposed multi-family residential buildings associated with the Playa del Oro project, which is currently under construction, located east of the project site would be potentially significant. However, implementation of Mitigation Measure H-3 would serve to locate groundborne vibration construction activities as far as possible from the nearest vibration-sensitive land uses, which would reduce the vibration levels experienced at the identified nearby sensitive receptors. In addition, implementation of Mitigation Measure H-11, which would prohibit the use of construction equipment that generates high levels of vibration (i.e., large bulldozers, loaded trucks, and caisson drills) within 45 feet of the existing off-site single-family residences and proposed multi-family residential buildings located immediately south and east of the project site boundary, respectively, during project construction, would ensure that the construction-related vibration impacts at these sensitive receptors would be reduced to a less-than-significant level. The groundborne vibration levels at these two off-site sensitive receptors after implementation of Mitigation Measures H-11 are shown in Table IV.H-14, Groundborne Vibration Levels at Affected Off-site Sensitive Uses After Mitigation.

Table IV.H-14
Groundborne Vibration Levels at Affected Off-site Sensitive Uses After Mitigation

Off-site Sensitive Land Use	Estimated PPV (in/sec)	Estimated Peak Construction-Related Groundborne Vibration Levels (VdB)
Single-family residential uses located immediately south of the project site.	0.037	79.3
Multi-family residential uses of the proposed Playa del Oro project (currently under construction) located immediately east of the project site.	0.037	79.3
Source: Christopher A Joseph & Associates, September 2008.		

Implementation of Mitigation Measure H-12, which would require all new mechanical equipment associated with the Proposed Project to comply with Section 112.02 of the City of Los Angeles Municipal

Code, would prevent that noise levels resulting from this equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. This would ensure that the effect of the noise levels from this equipment on off-site sensitive uses would be reduced to a less-than-significant impact. In addition, with implementation of Mitigation Measure H-13, which would ensure that all exterior windows associated with the proposed residential uses would be constructed such that sufficient sound insulation is provided to ensure that interior noise levels would be below a CNEL of 45 dBA in any habitable room, impacts associated with interior noise levels at the new residential uses onsite would be reduced to a less-than-significant level.

Implementation of Mitigation Measure H-14 would ensure that the ambient noise levels at the existing single-family residences to the south of the project site and the proposed multi-family residential uses associated with the Playa del Oro development to the east of the project site would not be exceeded by more than five decibels due to operation of the Proposed Project's parking structure. This would ensure that a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project would not occur at these nearby noise-sensitive receptors. As such, upon implementation of Mitigation Measure H-14, this impact would be reduced to a less-than-significant level.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. POPULATION, HOUSING, AND EMPLOYMENT

INTRODUCTION

This section evaluates the Proposed Project in terms of the Southern California Association of Governments' (SCAG) population, housing, and employment growth forecasts for the City of Los Angeles subregion. It also evaluates whether the Proposed Project would cause growth that exceeds projected or planned growth for the project are through the development of infrastructure and whether the Proposed Project would displace housing or residents necessitating replacement housing elsewhere.

ENVIRONMENTAL SETTING

As part of its comprehensive planning process for the Southern California region, SCAG has divided the region into 14 subregions (refer to Figure IV.I-1, SCAG Los Angeles Subregion). The project site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. In 2000, the City of Los Angeles had a population of 3,711,969 persons, 1,339,579 households, and employment for 1,781,863 persons (see Table IV.I-1).[1] SCAG forecasts that by the year 2010, the City of Los Angeles will have a total population of 4,057,484 persons (an increase of 9.3 percent from the year 2000), 1,433,105 households (an increase of 7.0 percent), and will provide employment for 1,820,092 persons (an increase of 2.1 percent). For the period of 2010 to 2015, forecasted growth in the City of Los Angeles continues, the Citywide population is expected to reach 4,128,125 persons (an increase of 1.7 percent), 1,493,244 households (an increase of 4.2 percent), and employment will total 1,864,061 jobs (an increase of 2.4 percent). For the period of 2015 to 2020, SCAG forecasts continue to anticipate growth in the City of Los Angeles; the Citywide population is expected to reach 4,204,329 persons (an increase of 1.8 percent), 1,556,604 households (an increase of 4.2 percent), and employment will total 1,892,139 (an increase of 1.5 percent).[2]

Project Site

The western portion of the project site is currently developed with four commercial structures totaling approximately 24,000 square feet (sf) of development. The existing on-site uses include: two real estate offices; a health food store/acupuncture office; a pilates/yoga studio; a gift shop; a karate/martial arts

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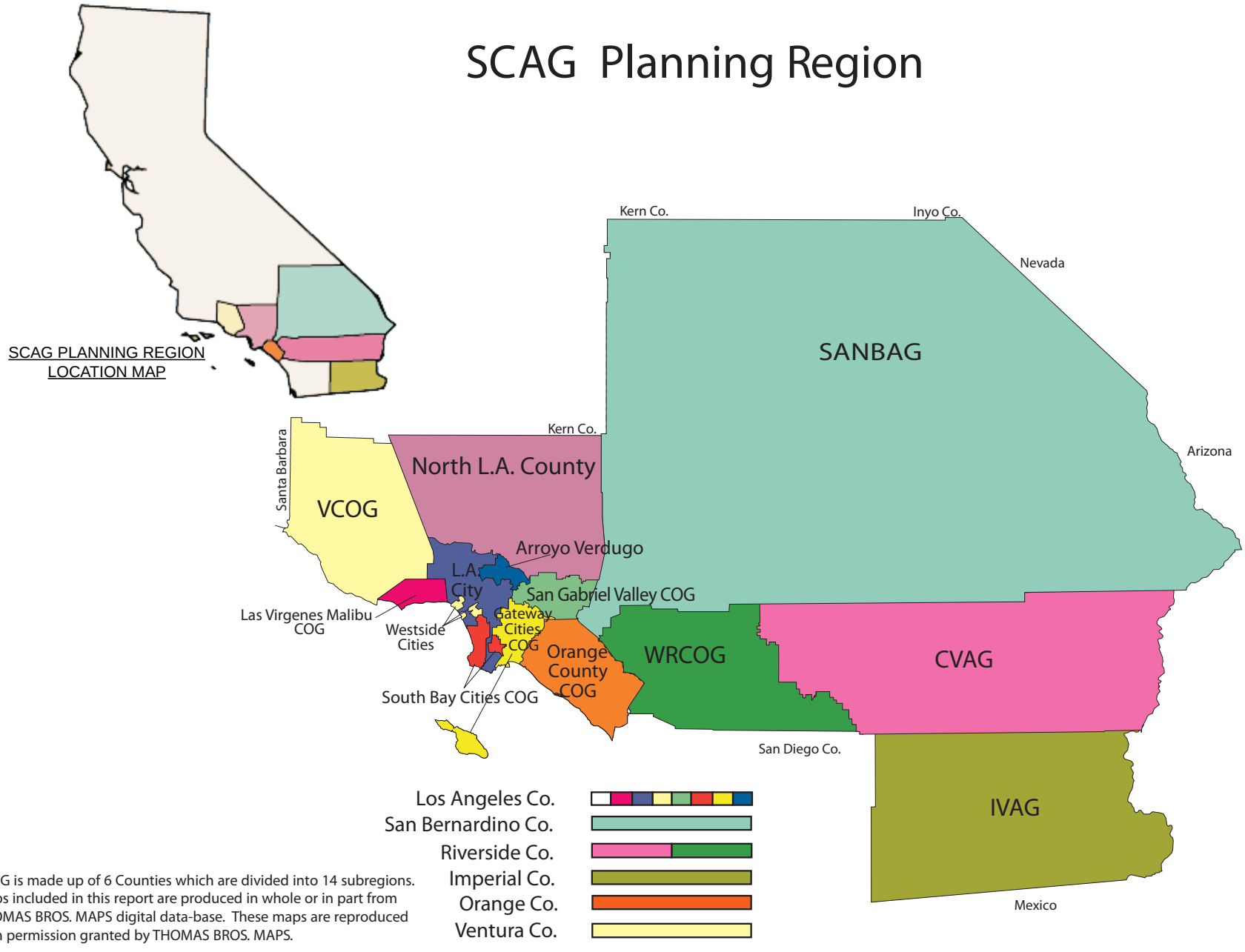
[1] *SCAG Forecast 2004. This reflects the year 2000 Census data from the U.S. Census Bureau. The 2004 Forecast is used because the 2008 Growth Projection published by SCAG does not include year 2000 data.*

[2] *SCAG Forecast 2004. This reflects the year 2000 Census data from the U.S. Census Bureau. The 2004 Forecast is used because the 2008 Growth Projection published by SCAG does not include year 2000 data.*

SCAG Planning Region



SCAG is made up of 6 Counties which are divided into 14 subregions. Maps included in this report are produced in whole or in part from THOMAS BROS. MAPS digital data-base. These maps are reproduced with permission granted by THOMAS BROS. MAPS.

Source: http://www.scag.ca.gov/rtpPEIR2004/draft/2004/pdf/0_2_SCAG_Region.pdf, 2007.

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Environmental Planning and Research

Figure IV.I-1
SCAG Los Angeles Subregion

Table IV.I-1
Population, Housing, and Employment Forecasts for the
City of Los Angeles / Los Angeles Subregion

Area	Population	Housing	Employment
City of Los Angeles / Los Angeles Subregion			
--2000 Census	3,711,969	1,339,579	1,781,863
--SCAG Forecasts			
2010	4,057,484	1,433,105	1,820,092
2015	4,128,125	1,493,244	1,864,061
2020	4,204,329	1,556,604	1,893,139
2025	4,277,732	1,605,959	1,925,148
2030	4,348,281	1,653,585	1,960,393
--Percent Change			
2000 to 2010	+9.3%	+7.0%	+2.1%
2010 to 2015	+1.7%	+4.2%	+2.4%
2015 to 2020	+1.8%	+4.2%	+1.6%
2020 to 2025	+1.7%	+3.2%	+1.7%
2025 to 2030	+1.6%	+3.0%	+1.8%
Census Tract 2766.02			
--2000 Census	8,128	4,561	1,877
--SCAG Forecasts			
2010	9,031	4,977	2,267
2015	9,184	5,174	2,333
2020	9,349	5,387	2,375
2025	9,509	5,554	2,424
2030	9,660	5,715	2,477
--Percent Change			
2000 to 2010	+11.1%	+9.1%	+20.8%
2010 to 2015	+1.7%	+4.0%	+2.9%
2015 to 2020	+1.8%	+4.1%	+1.8%
2020 to 2025	+1.7%	+3.1%	+2.1%
2025 to 2030	+1.6%	+2.9%	+2.2%

Source: SCAG 2004 and 2008 Growth Projections.
Source (table): Christopher A. Joseph & Associates, August 2008.

studio; an automotive service center; and an art supply store. The eastern portion of the project site is vacant.[3]

[3] *In 2004, City Council adopted a Mitigated Negative Declaration ("MND") for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site (the eastern portion of the current project site), which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project. See section III. Project Description, for a description of the Proposed Project.*

Census Tract

The project site is located entirely within Census Tract 2766.02. According to SCAG data and projections, Census Tract 2766.02 had a year 2000 population of 8,128 persons, contained 4,561 housing units, and provided employment for 1,877 persons (see Table IV.I-1).[4] By 2010, SCAG forecasts this census tract will have a total population of 9,031 persons, 4,977 households, and employment for 2,267 persons. SCAG forecasts that for the year 2015, the census tract will have a population of 9,184 persons, 5,174 households, and employment for 2,333 persons. By the year 2020, SCAG forecasts a population of 9,349 persons, 5,387 households, and employment for 2,375 persons in Census Tract 2766.02.

As shown in Table IV.I-2, the existing on-site uses at the project site generate employment for approximately 54 people. As there are no residential uses currently on-site, there is no permanent population on the project site.

Table IV.I-2
Estimated Employment for the Existing Uses at the Project Site

Type of Development	Size (sf)	Employee Generation Factor[a]	Total Employees
Retail	24,000	0.0022371 employees/square foot	54
		Total	**54**

[a] *Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*
Source (table): Christopher A. Joseph & Associates, March 26, 2008.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Proposed Project could have a potentially significant impact upon population and housing if it were to result in one or more of the following:

(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; or

[4] *SCAG Forecast 2004. This reflects the year 2000 Census data from the U.S. Census Bureau. The 2004 Forecast is used because the 2008 Growth Projection published by SCAG does not include year 2000 data.*

(c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination shall be made on a case-by-case basis, considering the following factors:

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

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

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

(d) The total number of residential units to be demolished, converted to market rate, or removed through other means, as a result of the Proposed Project, in terms of net loss of market rate and affordable units;

(e) The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;

(f) The land use and demographic characteristics of the project area, and the appropriateness of housing in the area; and

(g) Whether the project is consistent with adopted City and regional housing policies such as the framework and housing elements, HUD consolidated plan and CHAS policies, redevelopment plan, Rent Stabilization Ordinance, and the Regional Comprehensive Plan and Guide (RCPG).

Project Impacts

As discussed in Section II, Project Description, the Proposed Project involves the demolition of all on-site uses and the construction of a mixed-use development over an above and below grade parking garage. The Proposed Project would consist of 260 residential units (including 16 joint live/work units), including a multi-purpose room and a gym and recreation center, as well as a pool and landscaped common areas for a total of approximately 266,456 square feet. The design includes 475 parking spaces to serve the Proposed Project.

In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the

Proposed Project, which comprises 260 residential units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the analysis below focuses on the incremental effects of constructing an additional 126 residential units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

Construction

Construction of the Proposed Project would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the project site. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Proposed Project. The construction industry differs from most other employment sectors in several key ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes lengthy, daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steelworkers, masons, etc.) and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

Therefore, project-related construction workers would not be likely to relocate their place of residence as a consequence of working on the Proposed Project, and significant housing or population impacts would not result from construction of the Proposed Project.

Operation

Population

As discussed above, the Proposed Project involves the demolition of all on-site uses and the construction of 260 residential units on the project site, which includes the westerly portion of the Playa del Oro site that was previously approved for a 134-unit residential building. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which comprises 260 units, resulting in a net increase of 126 dwelling units. Therefore, the analysis below focuses on the incremental effects of constructing an additional 126 residential units. As the existing on-site uses are all commercial in nature, the net increase of 126 residential and joint live/work units also represents an increase in residential construction on the project site.

Based on the 2000 Census data, the City of Los Angeles had a total population of 3,711,969 persons; according to the California Department of Finance Population and Housing Estimates, dated January 1, 2008, the City had an average of 2.967 persons per household.[5] According to SCAG, the Citywide population is expected to increase by 416,156 between 2000 and 2015. Based on the City's current household demographics (e.g., an average of 2.967 persons per household), the construction of 126 additional residential units on the project site would be expected to result in an increase of approximately 374 net permanent residents in the City of Los Angeles.[6] Thus, the addition of an estimated 374 new residents under the Proposed Project would be well within the City's and SCAG's anticipated growth rate, representing 0.09 percent of the Citywide total growth for the period of 2000 to 2015.

SCAG projections estimate an increase of 1,532 residents in Census Tract 2766.02 between 2000 and 2030. As such, the Proposed Project's generation of 374 net new permanent residents would be within SCAG's population projection for this period for Census Tract 2766.02.

The Proposed Project would be within the projections for population growth within Census Tract 2766.02; therefore, the Proposed Project would be consistent with the population projections for the Los Angeles Subregion. Impacts related to population and population growth would therefore be less than significant.

Housing

Based on the 2000 Census data, the City of Los Angeles had a total of 1,339,579 housing units; according to the California Department of Finance, dated January 1, 2008, the City had an average of 2.967 persons per household. SCAG expects the Citywide housing supply to increase by 153,665 units between 2000 and 2015. The Proposed Project involves the removal of 24,000 square feet of commercial uses and the construction of 260 residential units on the project site, which includes the westerly portion of the Playa del Oro site that was previously approved for a 134-unit residential building. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 units, resulting in a net increase of 126 dwelling units. Therefore, the analysis below focuses on the incremental effects of constructing an additional 126 residential units. The net increase of 126 residential units would be well within the City's and SCAG's anticipated growth rate, representing 0.08 percent of the Citywide total growth for the period of 2000 to 2015.

SCAG projections estimate an increase of 613 housing units in Census Tract 2766.02 between the year 2000 and the year 2015. With the development of 126 additional residential and joint live/work units, the Proposed Project would be within SCAG's housing unit projection for the period between 2000 and 2015

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[5] *State of California, Department of Finance, E-5 City/County Population and Housing Estimates, 2008, Revised 2001-2007, with 2000 Benchmark, website: http://www.dof.ca.gov/HTML/DEMOGRAP/ReportsPapers/Estimates/E5/E5-06/E-5text2.asp, March 27, 2008.*

[6] *Population Generation is (2.967 x 126) = 374 residents.*

for Census Tract 2766.02 resulting in 487 fewer housing units than anticipated for the census tract containing the project site.

The Proposed Project would be within the projections for housing unit growth in Census Tract 2766.02 and would therefore be consistent with the housing projections for the Los Angeles Subregion. Additionally, as discussed in Section IV.G, Land Use and Planning, the Proposed Project would introduce high-density residential uses near a transit corridor, as encouraged by SCAG policy. Therefore, impacts related to housing and housing growth would be less than significant.

Employment

With the exception of the proposed 16 joint live/work units, the Proposed Project does not include any commercial component. Therefore, the Proposed Project is not expected to generate a substantial amount of on-site employment. As the Proposed Project would result in the removal of approximately 24,000 square feet of commercial development that currently provides employment for approximately 54 persons (see Table IV.I-2), buildout of the Proposed Project could result in a net job loss of up to 54 jobs on the project site.

The estimated employee generation by the Proposed Project would result in a decrease in employment at the project site. For the City of Los Angeles Subregion, as shown in Table IV.I-1, SCAG estimates in increase of 82,198 employees between the year 2000 and the year 2015. SCAG has forecasted that the total employment level for Census Tract 2766.02 will increase by approximately 456 employees between 2000 and 2015. Despite the decrease in employment associated with the implementation of the Proposed Project, SCAG and the City anticipate employment growth in the immediate project area and the Los Angeles Subregion, thereby providing jobs for the new residents generated by the Proposed Project. Therefore, the Proposed Project would result in a less than significant impact regarding employment.

CUMULATIVE IMPACTS

Of the 19 related projects identified in the project area, seven (related projects nos. 7, 8, 9, 10, 11, 15, and 18) are located outside of the City of Los Angeles. As these projects are located outside of the Los Angeles subregion, they would have no bearing upon population, housing, and employment forecasts. As such, they will not be included among the related projects in the cumulative impacts tables below.

Population

Based on the City's current household demographics (e.g., an average of 2.967 persons per household), the construction of 126 additional residential units on the project site would be expected to result in an increase in approximately 374 net permanent residents in the City of Los Angeles.[7] As shown in Table IV.I-3, Estimated Cumulative Population Generation, development of the Proposed Project combined with the related projects would result in a cumulative population growth of approximately 12,891

[7] *Population Generation is (2.967 x 126) = 374 residents.*

Table IV.I-3
Estimated Cumulative Population Generation

No.	Location (Address)	Size	Description	Population Generation Rate[a]	Total Generated Population (Persons)
1.	SW Corner of Lincoln Boulevard / Manchester Avenue	Playa del Oro/Furama Redevelopment			
		539 du	Apartment	2.967 persons/unit	1,599
		27,000 sf	Retail	N/A	
		(500) rm	*Hotel (to be removed)*	N/A	
		(10,420) sf	*Retail (to be removed)*	N/A	
		(10,590) sf	*Office (to be removed)*	N/A	
		(4,800) sf	*High-Turnover Restaurant (to be removed)*	N/A	
2.	7215 W. Manchester Avenue	4,850 sf	Walk-In Bank	N/A	
3.	6225 W. Century Boulevard	180 du	Hotel	N/A	
4.	7900 South Loyola Boulevard	16 st	Daycare Center	N/A	
5.	7831 Sepulveda Boulevard	600 st	School Expansion	N/A	
6.	5401 Beethoven Street	420 st	Private School	N/A	
7.	8632 Sepulveda Boulevard	3,621 sf	Walk-In Bank	N/A	
13.	12700 Braddock Drive	134,557 sf	Warehouse	N/A	
		1,357 sf	Office	N/A	
		(58,323) sf	*University of CA Laundry Building (to be removed)*	*N/A*	
14.	S of Jefferson Boulevard, E of Lincoln Boulevard	Playa Vista Phase I			
		3,246 du	Condominium	2.967 persons/unit	9,631
		2,142,050 sf	Office	N/A	
		25,000 sf	Retail	N/A	
		1,129,900 sf	Production & Staging Support	N/A	
		65,000 sf	Community Serving Uses	N/A	
		Playa Vista Phase I – Completed and Occupied			
		(2,166) du	Condominium	*(2.967 persons/unit)*	*(6,427)*
		(221,000) sf	Office	N/A	
		(12,500)sf	Retail	N/A	
15.	S of Jefferson Boulevard/Westlawn Avenue	Playa Vista Phase II			
		175,000 sf	Office	N/A	
		2,600 du	Apartment	2.967 persons/unit	7,714
		150,000 sf	Shopping Center	N/A	
		40,000 sf	Community Serving Uses	N/A	
17.	1 LMU Drive	7,800 st	Loyola Marymount University Master Plan	N/A	

Table IV.I-3 (Continued)
Estimated Cumulative Population Generation

No.	Location (Address)	Size	Description	Population Generation Rate[a]	Total Generated Population (Persons)
19.	9204 Airport Boulevard		Airport Boulevard Carwash		
		1 site	Car Wash	N/A	
		(15,251) sf	*Car Rental Facility (to be removed)*	N/A	
				Related Projects Total	**12,517**
				Proposed Project Net Total	**374**
				Cumulative Total (Related Projects Total + Proposed Project Total)	**12,891**

Note: Numbers in parentheses are negative numbers and uses in italics and parentheses are uses to be removed.
Number of residents is based on an average of 2.967 persons per household, State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, 2001-2008, with 2000 Benchmark at http://www.dof.ca.gov/HTML/DEMOGRAP/ReportsPapers/Estimates/E5/E5-06/E-5text2.asp
Source: Crain & Associates, June 2008.
Source (Table): Christopher A. Joseph & Associates, August 2008.

residents, which would be within the growth forecasts presented by SCAG for the City of Los Angeles from 2000 to 2015. The Proposed Project's and the related projects' combined contribution to this growth would represent approximately 3.1 percent of the total. Alone, the Proposed Project would represent approximately 2.9 percent of the cumulative population increase. Therefore, cumulative impacts would be less than significant.

Housing

The Proposed Project would result in an increase of 126 residential and joint live/work units. As shown in Table IV.I-4, Cumulative Housing Development, the related projects would develop approximately 4,219 new units within the project area, resulting in a total of 4,345 new housing units when combined with the Proposed Project's 126 additional housing units. SCAG forecasts the addition of approximately 153,665 housing units within the City from 2000 to 2015. The Proposed Project combined with the related projects represents approximately 2.8 percent of the housing growth. Therefore, the Proposed Project and related projects additional housing units would be within the SCAG forecast.

Construction of the Proposed Project itself would be within the year 2000 to year 2015 SCAG forecasts for housing units in Census Tract 2766.02. The Proposed Project would add approximately 126 additional residential and joint live/work units, which is 487 units fewer than what is forecasted for Census Tract 2766.02 between years 2000 and 2015, representing approximately 20.6 percent of the total. As the Proposed Project and related projects combined would be within the SCAG forecast for the Los Angeles subregion, cumulative impacts would be less than significant.

Table IV.I-4
Cumulative Housing Development

No.	Location (Address)	Size	Description	Total Proposed Residential Units
1.	SW Corner of Lincoln Boulevard/ Manchester Avenue	Playa del Oro/Furama Redevelopment		
		539 du	Apartment	539
		27,000 sf	Retail	
		(500) rm	*Hotel (to be removed)*	
		(10,420) sf	*Retail (to be removed)*	
		(10,590) sf	*Office (to be removed)*	
		(4,800) sf	*High-Turnover Restaurant (to be removed)*	
2.	7215 W. Manchester Avenue	4,850 sf	Walk-In Bank	
3.	6225 W. Century Boulevard	180 du	Hotel	
4.	7900 South Loyola Boulevard	16 st	Daycare Center	
5.	7831 Sepulveda Boulevard	600 st	School Expansion	
6.	5401 Beethoven Street	420 st	Private School	
7.	8632 Sepulveda Boulevard	3,621 sf	Walk-In Bank	
13.	12700 Braddock Drive	134,557 sf	Warehouse	
		1,357 sf	Office	
		(58,323) sf	*University of CA Laundry Building (to be removed)*	
14.	S of Jefferson Boulevard, E of Lincoln Boulevard	Playa Vista Phase I		
		3,246 du	Condominium	3,246
		2,142,050 sf	Office	
		25,000 sf	Retail	
		1,129,900 sf	Production & Staging Support	
		65,000 sf	Community Serving Uses	
		Playa Vista Phase I – Completed and Occupied		
		(2,166) du	Condominium	*(2,166)*
		(221,000) sf	Office	
		(12,500)sf	Retail	
15.	S of Jefferson Boulevard/Westlawn Avenue	Playa Vista Phase II		
		175,000 sf	Office	
		2,600 du	Apartment	2,600
		150,000 sf	Shopping Center	
		40,000 sf	Community Serving Uses	
17.	1 LMU Drive	7,800 st	Loyola Marymount University Master Plan	
19.	9204 Airport Boulevard		Airport Boulevard Carwash	
		1 site	Car Wash	
		(15,251) sf	*Car Rental Facility (to be removed)*	
			Related Projects Total	**4,219**
			Proposed Project Net Total	**126**
			Cumulative Total (Related Projects Total + Proposed Project Total)	**4,345**

Note: Numbers in parentheses are negative numbers and uses in italics and parentheses are uses to be removed.
Source: Crain & Associates, June 2008.
Source (Table): Christopher A. Joseph & Associates, August 2008.

Employment

The Proposed Project would result in a net decrease in employment on the project site of up to approximately 54 employees. However, as shown in Table IV.I-5, Estimated Cumulative Employment Generation, the related projects would generate approximately 11,663 jobs, and when combined with the Proposed Project, would result in approximately 11,609 jobs in the project area. Therefore, although implementation of the Proposed Project would result in the loss of jobs on-site, job growth is forecast for the project area and the City of Los Angeles. The addition of 11,609 jobs is within the year 2000 to 2015 SCAG employment forecast for the City of Los Angeles, representing approximately 14.1 percent of expected growth.

Table IV.I-5
Estimated Cumulative Employment Generation

No.	Location (Address)	Size	Description	Population Generation Rate[a]	Total Service Population (Persons)
1.	SW Corner of Lincoln Boulevard/ Manchester Avenue	Playa del Oro/Furama Redevelopment			
		539 du	Apartment	N/A	
		27,000 sf	Retail	2.2371 employees/1,000 sf	60
		(500) rm	*Hotel (to be removed)*	*(0.9 employees/room[c])*	*(450)*
		(10,420) sf	*Retail (to be removed)*	*(2.2371 employees/1,000 sf)*	*(23)*
		(10,590) sf	*Office (to be removed)*	*(3.4965 employees/1,000 sf)*	*(37)*
		(4,800) sf	*High-Turnover Restaurant (to be removed)*	*(2.2371 employees/1,000 sf[g])*	*(11)*
2.	7215 W. Manchester Avenue	4,850 sf	Walk-In Bank	2.2371 employees/1,000 sf[b]	11
3.	6225 W. Century Boulevard	180 du	Hotel	0.9 employees/room[c]	162
4.	7900 South Loyola Boulevard	16 st	Daycare Center	1 employee/13 students[d]	1
5.	7831 Sepulveda Boulevard	600 st	School Expansion		
6.	5401 Beethoven Street	420 st	Private School	1 employee/13 students[d]	32
7.	8632 Sepulveda Boulevard	3,621 sf	Walk-In Bank	2.2371 employees/1,000 sf[b]	8
13.	12700 Braddock Drive	134,557 sf	Warehouse	2.6954 employees/1,000 sf[e]	363
		1,357 sf	Office	3.4965 employees/1,000 sf	5
		(58,323) sf	*University of CA Laundry Building (to be removed)*	*(2.2371 employees/1,000 sf[b])*	*(130)*
14.	S of Jefferson Boulevard, E of Lincoln Boulevard	Playa Vista Phase I			
		3,246 du	Condominium	N/A	
		2,142,050 sf	Office	3.4965 employees/1,000 sf	7,490
		25,000 sf	Retail	2.2371 employees/1,000 sf	56
		1,129,900	Production & Staging	2.6954	3,046

Table IV.I-5 (Continued)
Estimated Cumulative Employment Generation

No.	Location (Address)	Size	Description	Population Generation Rate[a]	Total Service Population (Persons)
		sf	Support	employees/1,000 sf[e]	
		65,000 sf	Community Serving Uses	3.4965 employees/1,000 sf[f]	227
		Playa Vista Phase I – Completed and Occupied			
		(2,166) du	*Condominium*	*N/A*	
		(221,000) sf	*Office*	*(3.4965 employees/1,000 sf)*	*(773)*
		*(12,500)*sf	*Retail*	*(2.2371 employees/1,000 sf)*	*(28)*
15.	S of Jefferson Boulevard/Westlawn Avenue	Playa Vista Phase II			
		175,000 sf	Office	3.4965 employees/1,000 sf	612
		2,600 du	Apartment	N/A	
		150,000 sf	Shopping Center	2.2371 employees/1,000 sf	336
		40,000 sf	Community Serving Uses	3.4965 employees/1,000 sf[f]	140
17.	1 LMU Drive	7,800 st	Loyola Marymount University Master Plan	1 employee/13 students[f]	600
19.	9204 Airport Boulevard		Airport Boulevard Carwash		
		1 site	Car Wash	N/A[h]	N/A
		(15,251) sf	*Car Rental Facility (to be removed)*	*(2.2371 employees/1,000 sf)*	*(34)*
Related Projects Total					**11,663**
Proposed Project Net Total					***(54)***
Cumulative Total (Related Projects Total + Proposed Project Total)					**11,609**

Note: Numbers in parentheses are negative numbers and uses in italics and parentheses are uses to be removed.

[a] *Except where otherwise noted, employment generation factors are based on Los Angeles Unified School District, School Fee Justification Studies for Los Angeles Unified School District, Table ES-2, September 2002.*

[b] *Number of employees was calculated utilizing the "Retail" employment generation factor.*

[c] *Employment generation factor for Hotel uses is based on data in the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition. The factor represents the number of employees per hotel room.*

[d] *The employment generation factor for schools is based on data in the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition. The employment generation factor is based on data collected for estimating the trip generation per employee, student, and square footage on a weekday. The factors also represent the approximate number of square feet or students that would generate one employee (i.e., one employee per 1,000 square feet or one employee per 13 students).*

[e] *Number of employees was calculated utilizing the "Industrial" employment generation factor.*

[f] *Number of employees was calculated utilizing the "Office" employment generation factor.*

[g] *Employment generation factors are based on survey data presented in the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition. The factors represent the number of employees generated per square foot.*

[h] *Number of employees could not be calculated as the square footage of this project was not provided.*

Source: Crain & Associates, June 2008.
Source (table): Christopher A. Joseph & Associates, June 2008.

Cumulative growth within the region would be consistent with SCAG projections for the City of Los Angeles. The Proposed Project, therefore, would not be cumulatively considerable and would result in a less than significant cumulative impact.

MITIGATION MEASURES

No mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Proposed Project would result in less than significant impacts on population, housing, and employment.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
1. FIRE PROTECTION

INTRODUCTION

This section evaluates the potential impacts of the Proposed Project on fire and police protection services and facilities in the project area. This section also evaluates impacts on school facilities, parks and recreation, and library services and facilities in the project area.

ENVIRONMENTAL SETTING

Existing Fire Service

Fire prevention, fire suppression, and life safety services in the City of Los Angeles are provided by the City of Los Angeles Fire Department (LAFD). These activities are governed by the Fire Protection and Prevention Plan (FPPP), an Element of the City's General Plan, as well as the City of Los Angeles Fire Code (Fire Code) Section (Article 7 of Chapter V, Public Safety and Protection) of the Los Angeles Municipal Code (LAMC). The FPPP and Fire Code serve as guides to City departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities as well as the provision of fire protection services located within the City of Los Angeles. Policies and programs addressed in these documents include the following: fire station distribution and location, required fire flow (i.e., water supply), fire hydrant standards and locations, access provisions, and emergency ambulance service.

The LAFD has 3,586 uniformed personnel and 353 non-uniformed professional support staff. Services of the LAFD include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. A professionally trained staff of 1,101 uniformed firefighters (including 242 paramedic-trained personnel) is on duty at all times at 106 neighborhood fire stations located across the LAFD's 471 square-mile jurisdiction.[1]

The project site is located within LAFD's Division 2, which has jurisdiction over a 107 square-mile district that encompasses south and southwest Los Angeles as well as the Los Angeles International Airport (LAX) and Harbor regions. Division 2 is further broken down into five Battalions (Battalions 3, 4, 6, 13, and 18) and 33 neighborhood Fire Stations. The project site is located within LAFD's Battalion 4 and is served by Fire Station 5. Additional fire protection services are provided by Fire Station 67 and Fire Station 51, both of which are also part of Battalion 4.[2] Existing fire stations that currently serve the project site are listed in Table IV.J-1, Existing Fire Stations Serving the Project Site. The locations of these fire stations are shown in Figure IV.J-1, Fire and Police Station Locations.

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[1] *City of Los Angeles Fire Department website: http://lafd.org/about.htm, November 17, 2008.*

[2] *City of Los Angeles Fire Department website: http://lafd.org/batt4.htm, May 5, 2008.*

Table IV.J-1
Existing Fire Stations Serving the Project Site

Station No.	Location	Equipment	Distance to Project Site (miles)	Response Time to Project Site (minutes)
5	8900 South Emerson Avenue	• 1 Light Force o 1 Fire Truck o 2 Fire Engines • Paramedic Rescue Ambulance • 1 Battalion Command Team • Staff of 15 at all times	1.3	5.0
67	5451 Playa Vista Drive	• Paramedic Assessment Fire Engine • Basic Life Support Rescue Ambulance • Staff of 6 at all times	1.4	5.2
51	10435 Sepulveda Boulevard (LAX)	• Paramedic Assessment Fire Engine • Paramedic Rescue Ambulance • Staff of 6 at all times	2.5	7.4

Source: Written correspondence with Captain William Wells, Captain II-Paramedic, Los Angeles Fire Department, Planning and Research Division, October 29, 2008.

Fire Station 5

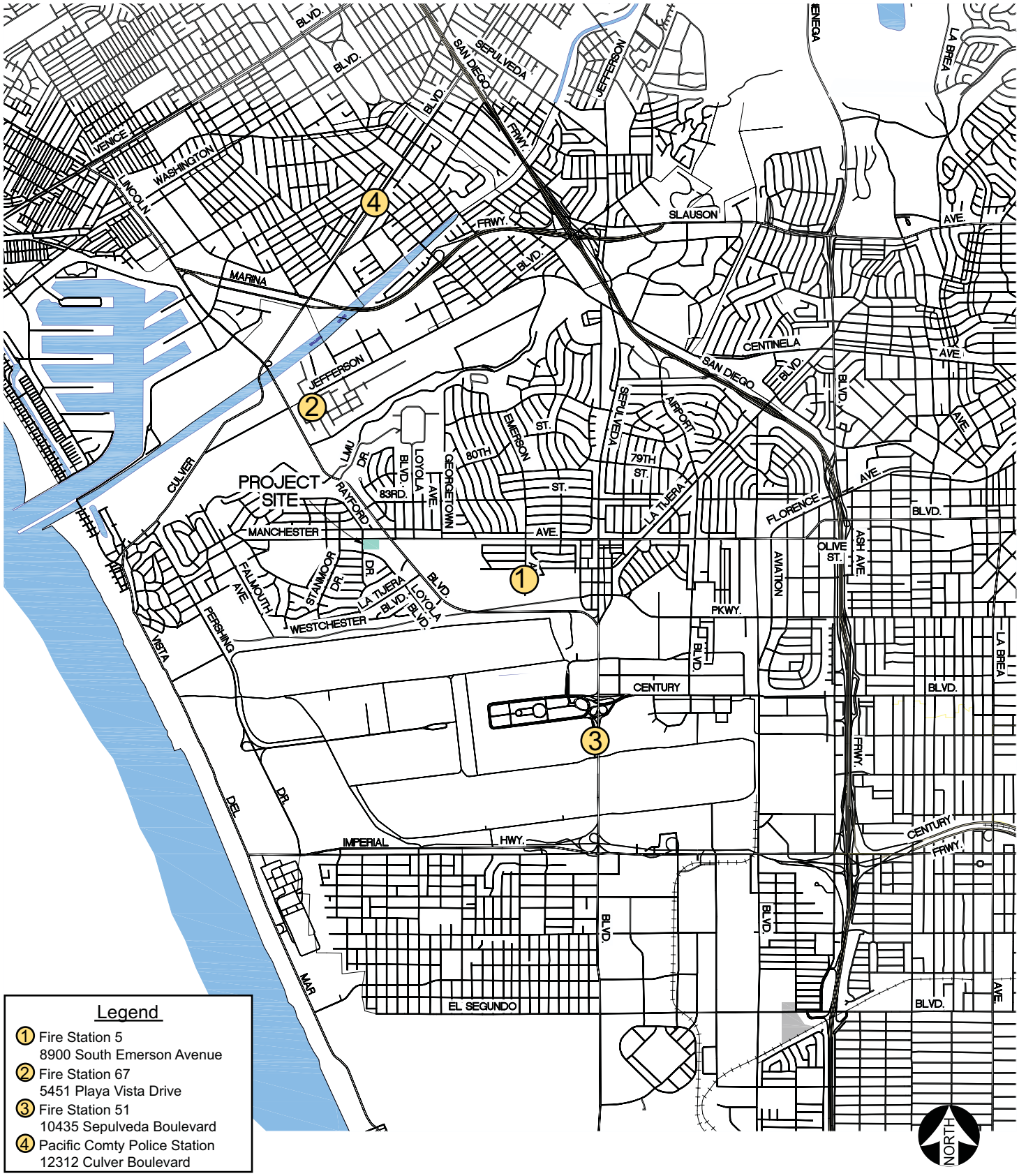
Fire Station 5 is located at 8900 South Emerson Avenue in the Westchester-Playa del Rey community, approximately 1.3 miles southeast of the project site. Fire Station 5 is equipped with a Light Force Truck and Engine Company, a paramedic rescue ambulance, Battalion Command Team, EMS Battalion Captain and a staff of fifteen. The response time from Fire Station 5 to the project site is approximately five minutes.

Fire Station 67

Fire Station 67 is located at 5451 Playa Vista Drive in the Westchester-Playa del Rey community, approximately 1.4 miles northwest of the project site. Fire Station 67 is staffed with six members at all times. The response time from Fire Station 67 to the project site is approximately 5.2 minutes.

Fire Station 51

Fire Station 51 is located at 10435 Sepulveda Boulevard at the Los Angeles International Airport (LAX), approximately 2.5 miles southeast of the project site. Fire Station 51 is staffed with six members at all times. The response time from Fire Station 51 to the project site is approximately 7.4 minutes.



Legend

1. Fire Station 5
   8900 South Emerson Avenue
2. Fire Station 67
   5451 Playa Vista Drive
3. Fire Station 51
   10435 Sepulveda Boulevard
4. Pacific Comty Police Station
   12312 Culver Boulevard

Source: Google Earth Pro; Crain & Associates, June 23, 2008.

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Environmental Planning and Research

Figure IV.J-1
Fire and Police Station Locations

Regulatory Framework

Fire Flows

In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). 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 required gpm is flowing.[3]

Water for fire flows for the area surrounding the project site is provided by the City of Los Angeles Department of Water and Power (LADWP). All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Please refer to Section IV.L.1 (Water) for a discussion of water service infrastructure in the project area.

Response Distance and Times

The Fire Code specifies maximum response distances allowed between specific locations and Engine/Truck companies, based upon land use and fire flow requirements. The Fire Code states that the maximum response distance from an engine or truck company to a high-density residential and commercial area should be 1.5 miles.[4] When response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.). The Fire Code also requires the provision of automatic fire sprinkler systems in high-rise developments.

Response time relates directly to the physical linear travel distance (i.e., the number of miles between a fire station and a specific location) and the LAFD's ability to successfully navigate the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time the LAFD arrives at the site. Thus, roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along the response route can affect the response time.

As discussed in Section IV.K, Traffic, Transportation, and Parking, six of the seven study intersections in the project area currently operate at LOS D or better during the AM and PM peak hours. Intersection No. 1: 83rd Street and Lincoln Boulevard operates at LOS F during both the AM and the PM peak hour; and Intersection No. 5: Manchester Avenue and Lincoln Boulevard operates at LOS F during both the AM and PM peak hour.

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[3] *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, Section 57.09.06, Table 9-A.*

[4] *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, Section 57.09.06, Proposed Table 9-C.*

Emergency Access

Emergency vehicle access to the project site is provided from local roadways. Major roadways near the project site include Manchester Avenue and Lincoln Boulevard. Roadways adjacent to the project site include: Manchester Avenue, Lincoln Boulevard, and Rayford Drive, as well as a driveway along the southern boundary.

ENVIRONMENTAL IMPACTS

Methodology

In accordance with standard LAFD methodology, adequate fire protection is determined based on the required fire flows for the land uses proposed, distance to the nearest fire station for the land uses proposed, and hydrant and access improvements. The LAFD does not determine the adequacy of fire protection based on response times or number of Emergency Medical Services (EMS) or fire-related incidents. The following discussion addresses the Proposed Project's potential impacts on fire protection services based on fire flows, response distance, and LAFD review of hydrants and access.

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact on fire protection services if it would:

(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Furthermore, as set forth in the L.A. CEQA Thresholds Guide, the determination of significance levels for the Proposed Project's impacts on fire protection services shall be made on a case-by-case basis, considering the following factor:

(a) If it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

Project Impacts

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-

unit building, the Applicant proposes to construct the Proposed Project, which comprises 260 units, including 16 joint live/work units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

Construction Impacts

Development of the Proposed Project would involve the demolition of all existing uses and the construction of an additional 126 apartment units. Construction of the Proposed Project would increase the potential for accidental on-site fires from such sources 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 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 services, 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:

(a) Construction impacts are temporary in nature and do not cause lasting effects;

(b) 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

(c) The project site is currently within the required 1.5-mile radius of LAFD Fire Station No. 5. Further, the project site would continue to be located in proximity to an LAFD fire station 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. Therefore, construction-related impacts on fire protection services would be less than significant.

Operational Impacts

As discussed in Section IV.I, Population, Housing, and Employment, the Proposed Project would introduce approximately 374 new residents. Implementation of the Proposed Project would also increase the number of visitors (i.e., at the proposed residences) at the project site. While the number of site visitors cannot be calculated with accuracy, the 374 estimated project residents is a conservative projection of the number of people on-site at any given time. This is due to the fact that many project residents would be employed at off-site locations during the daytime hours. Nonetheless, this increase in residents and visitors to the project site would generate a potential increase in demand for fire protection services. The discussion below considers the major criteria for determining the Proposed Project's potential impacts on fire protection services, including fire flows, response distance and time, and LAFD review of hydrants and access.

Fire Flows

According to the Fire Code, the overall fire flow requirement for the Proposed Project (a high-density residential land use) is 4,000 gpm from four fire hydrants flowing simultaneously with a 20 psi minimum residual pressure remaining in the system while the required gallons per minute are flowing.[5] According to LADWP, a 10-inch water main is required to satisfy the required 4,000 gpm fire flow. The water main serving the project site is a 12-inch main line,[6] which is in compliance with LADWP requirements. Additionally, the location and number of any new private hydrants would be determined as part of the LAFD plot plan review. Therefore, impacts related to fire flow would be potentially significant unless mitigated.

Response Distances and Times

As discussed in Section IV.K Traffic, Transportation, and Parking, upon buildout of the related projects associated with the Proposed Project and ambient traffic growth, six of the seven study intersections in the project area would operate at LOS D or better during the AM and PM peak hours in the year 2012.

The following study intersection would operate at LOS F during the AM or PM peak hour in 2012:

- 83rd Street and Lincoln Boulevard

The above intersection would continue to operate at LOS F during at least one peak hour with implementation of the Proposed Project in 2012.

The LAFD has indicated that distance to the nearest fire station is the primary indicator of LAFD's ability to provide adequate services. For a high-density residential and commercial neighborhood, a project must be within a response distance of 1.5 miles of an LAFD fire station. Should a project fall outside of the

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[5] *City of Los Angeles Municipal Code, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.06, Table 9-A.*

[6] *Phone correspondence with Chuck Lima, Project Manager for the Playa del Oro development, Cobalt Construction Company, October 22, 2009.*

1.5-mile response distance, installation of an automatic fire sprinkler system is required. As shown in Table IV.J-1, the Proposed Project is within a 1.5-mile radius of LAFD Fire Station No. 5, the first-in response station, as well as Fire Station No. 67. As such, the Proposed Project would be in compliance with the Fire Code mandated response distance and would not be expected to require the installation of an on-site automatic fire sprinkler system. Therefore, the Proposed Project would provide adequate on-site fire protection and impacts would be less than significant.

Emergency Access

Emergency vehicle access to the Proposed Project would continue to be provided from local and major roadways near the project site (i.e., Manchester Avenue and Lincoln Boulevard), and roadways adjacent to the project site (Rayford Drive and a proposed private driveway adjacent to the southern edge of the project site). Additionally, emergency access to the project site would be maintained at all times. Therefore, impacts related to emergency access would be less than significant.

CUMULATIVE IMPACTS

Implementation of the Proposed Project in combination with the related projects identified in Section II, Environmental Setting, would increase the demand for fire protection services in the project area. Specifically, there would be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (i.e., property taxes, government funding) to which the applicants of the Proposed Project and related projects would be required to contribute.

As discussed previously, the project site is currently served by Fire Station No. 5, with supplemental fire services provided by Fire Station No. 67 and Fire Station No. 95. Of the 19 related projects, five related projects (Related Project Nos. 1, 2, 5, 7, and 17) would also be primarily served by Fire Station No. 5. Six related projects (Related Project Nos. 4, 6, 8, 13, 14, and 15) would be primarily served by Fire Station No. 67, and one of the related projects would be served by Fire Station No. 51 (Related Project No. 3). Seven related projects would not be served by the first-in-response Fire Station No. 5, or the supplemental Fire Station Nos. 67 and 51. Of the seven related projects not served by Fire Station Nos. 5, 67, or 51, one would be served by Fire Station No. 95 (Related Project No. 19). Six related projects (Related Project Nos. 9-12, 16, and 18) are not located within the City of Los Angeles and would not be served by LAFD. Therefore, the Proposed Project would combine with five of the related projects identified to create a cumulative demand on fire protection services from Fire Station No. 5. The Proposed Project would also combine with six of the related projects identified to create a cumulative demand on fire protection services from Fire Station No. 67, and one of the related projects to create a cumulative demand on fire protection services from Fire Station No. 51.

The LAFD determines adequate fire protection based on fire flows, response distance, and LAFD review of hydrants and access. None of these factors would be affected by the development of the related projects. Similar to the Proposed Project, design and development of the related projects would be subject to the requirements of the LAMC and review and requirements of the LAFD. Measures to ensure adequate fire flow, hydrant placement, and emergency access and to minimize demand for fire service would be provided by the LAFD on a case-by-case basis in an effort to reduce impacts associated with

future developments. Through this process, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be assured. On this basis, it is anticipated that cumulative impacts to fire protection would be less than significant. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Proposed Project and related projects would contribute.

MITIGATION MEASURES

Because impacts related to fire protection services would be less than significant, no mitigation measures are required. However, the City requires implementation of the following standard measures to mitigate any of the less-than-significant impacts of the project:

J-1. The project applicant shall submit a plot plan to the LAFD prior to occupancy of the project, for review and approval, which shall provide the capacity of the fire mains serving the project site. Any required upgrades shall be identified and implemented prior to occupancy of the project.

J-2. The Proposed Project shall comply with all fire code and ordinance requirements for building construction, emergency access, water mains, fire flows, and hydrant placement. Prior to the issuance of a certificate of occupancy for any phase of the project, the applicant shall implement all fire code and ordinance requirements to the satisfaction of the Los Angeles Fire Department.

J-3. The design of the project site shall provide adequate access for Fire Department equipment and personnel to the structure.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to fire protection services would be less than significant.[7]

[7] *If upgrades to the water main would be needed in order to meet fire-flow requirements, secondary environmental impacts, such as additional noise, pollutant emissions, and temporary lane closures, could occur.*

ENVIRONMENTAL SETTING

Existing Police Service

Police protection services in the City of Los Angeles are provided by the City of Los Angeles Police Department (LAPD). The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several community stations.

Existing Police Stations

The project site is located within the LAPD's West Bureau and is served by the Pacific Community Police Station, located at 12312 Culver Boulevard (see Figure IV.J-1, Fire and Police Station Locations). The Pacific Community Police Station serves an approximate 24.1-square-mile area and a population of approximately 200,000 residents.[8] The Pacific Community Police Station provides police service in the Westchester-Playa del Rey community and the surrounding area, including the following neighborhoods: Venice Beach, Oakwood, Mar Vista, Playa del Rey, and Westchester. With approximately 292 sworn officers, the Pacific Community Police Station currently provides an officer-to-population ratio of approximately 1.46 officers per 1,000 residents.[9] The Pacific Community Police Station is also staffed with 20 civilian support staff.[10]

Crime Statistics

The LAPD's operational statistics are generally reported and analyzed in terms of response times and crime rates within specific Reporting Districts (RDs). Within the Rey Pacific Community Police Station area, the project site is located within RD 1483, which is bound roughly by Manchester Avenue to the north, Lincoln Boulevard to the east, 91st Street and Los Angeles International Airport property to the south, and Pershing Drive to the west. Table IV.J-2, RD 1483, Pacific Community Police Station Area, and Citywide Crime Statistics for 2007, provides a comparison of crime statistics for each jurisdiction.

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[8] *City of Los Angeles Police Department, West Bureau, Pacific Community Police Station, website: http://www.lapdonline.org/pacific_community_police_station/content_basic_view/1600, May 6, 2008.*

[9] *292 officers x 1,000 residents = 292,000. 292,000 ÷ 200,000 total service area residents = 1.46 officers per 1,000 residents.*

[10] *Letter Correspondence with William J. Bratton, Chief of Police and Lieutenant Doug Miller , Officer in Charge, Community Relations Section, Office of the Chief of Police, as Prepared by Officer Nina Preciado, Community Relations Section, Crime Prevention Unit, May 27, 2008.*

Table IV.J-2
RD 1483, Pacific Community Police Station Area, and Citywide Crime Statistics for 2007[a, b c]

Type of Crime	Number of Crimes		
	RD 1483	Area	Citywide
Burglary from Business	1	158	3,441
Burglary from Residence	35	856	13,721
Burglary Other	3	125	2,485
Street Robbery	10	285	9,811
Other Robbery	7	167	3,668
Murder	0	8	394
Rape	2	40	997
Aggravated Assault	6	265	12,690
Burglary from Vehicle	62	1,197	21,081
Theft from Vehicle	18	575	9,482
Grand Theft	15	1,236	11,675
Theft from Person	2	65	1,049
Purse Snatch	0	4	347
Other Theft	22	1,026	14,513
Vehicle Theft	29	971	24,391
Bunco	0	5	349
Bike	0	1	221
Total Crimes	***212***	***6,984***	***130,585***

[a] *Note: RD = Reporting District.*
[b] *The Pacific Community Police Station serves Del Rey, Manchester Square, Mar Vista, Oakwood, Palms, Playa Del Rey, Playa Vista, Venice, and Westchester.*
[c] *Source: Letter Correspondence with William J. Bratton, Chief of Police and Lieutenant Doug Miller, Officer in Charge, Community Relations Section, Office of the Chief of Police, as prepared by Officer Nina Preciado, Community Relations Section, Crime Prevention Unit, May 27, 2008.*

As shown in Table IV.J-2, RD 1483 had 212 crimes in 2007, with predominant crimes being burglary from vehicle, burglary from residence, and vehicle theft. Because the population of RD 1483 is not available, it is not possible to determine the crime rate for RD 1483.

As shown in Table IV.J-2, the Pacific Community Police Station Area had 6,984 crimes in 2007, with predominant crimes being grand theft, burglary from vehicle, and other theft. Therefore, the crime rate in the Pacific Community Police Station Area in 2007 was approximately 29 crimes per 1,000 persons. For comparative purposes, in 2007 the City of Los Angeles had a population of 4,346,867 people and had 130,585 crimes. The citywide crime rate in 2007 was approximately 30 crimes per 1,000 people. Based on the crime rates for 2007, the Pacific Community Police Station Area has approximately three percent less crime per capita than the City of Los Angeles as a whole.

Regulatory Framework

Under the City Charter, the Board of Police Commissioners is the head of the LAPD. The Board of Police Commissioners sets overall policy while the Chief of Police manages the daily operations of the LAPD and implements the Board of Police Commissioners' policies.

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 services (Section IV.J.1), police units are most often in 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 for the Westchester-Playa del Rey Community Area during 2007 was approximately 7.5 minutes, which is longer than the citywide average for the year 2007 of approximately 6.9 minutes.

LAPD Review

The LAPD has recommended that developers of large-scale projects contact the LAPD for advice with regard to crime prevention features that may be incorporated into the Proposed Project's site design.

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to police protection are determined based on a project's need for a new or physically altered police station. While current response times, crime statistics, and the LOS at surrounding intersections are relevant background information, these data are not used to determine police protection impacts under CEQA. The adequacy of police protection is evaluated using the existing number of police officers in a project's police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that a project would introduce to the area. Using these statistics, it is possible to estimate the future officer-to-population ratio in the area that would occur and the number of officers that would be necessary to maintain the existing level of police protection (or, if the existing level is not considered adequate, the number required to obtain an adequate level of police protection). This need can be reduced through on-site security improvements. This increase in officers is then determined to be either accommodated within the existing police station(s) in the area, or may require the construction of a new or expansion of an existing police station.

Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines*, the project would have a significant impact on police protection services if it would:

(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of levels of significance for the Proposed Project's impacts on police protection services shall be made on a case-by-case basis, considering the following factors:

(a) The population increase resulting from the Proposed Project, based on the net increase of residential units or square footage of non-residential floor area;

(b) The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the Proposed Project's proportional contribution to the demand; and

(c) Whether the Proposed Project includes security and/or design features that would reduce the demand for police services.

Project Impacts

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant is proposes to construct the Proposed Project, which is comprised of 260 units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

Construction Impacts

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 applicant will

employ construction security features, such as fencing, which would serve to minimize the need for LAPD services.

Traffic generated by construction workers and trucks would occur primarily during off-peak 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, impacts associated with construction activities would be less than significant.

Operational Impacts

As discussed in Section IV.I, Population, Housing, and Employment, the Proposed Project would introduce approximately 374 new permanent residents to the project site. Buildout of the Proposed Project would also increase the number of site visitors (i.e., at the proposed residences) within the project site. While the number of site visitors cannot be calculated with accuracy, it should be noted that the estimated 374 project residents is a conservative projection of the number of persons on-site at any given time. This is due to the fact that many project residents would be employed at locations off-site during the daytime hours. Although there is not a direct proportional relationship between increases in land use activity and increase in demand for police protection services, 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 an increase in on-site activity and increased traffic on adjacent streets and arterials. Such calls are typical of problems experienced in existing residential neighborhoods in the project area and do not represent unique law enforcement issues specific to the Proposed Project. The discussion below considers some of the criteria that may be used to determine the Proposed Project's impact on police protection services, including LAPD response time and staffing levels in the project area.

The Proposed Project would include strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security would be controlled to limit public access. The building and layout design of the proposed structure also include crime prevention features, such as nighttime security lighting and secure parking facilities. All crime prevention features shall be approved by the LAPD prior to issuances of a building permit. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a level of security during evening and early morning hours. Therefore, operational impacts would be less than significant.

Officer-to-Population Ratio

Based on the City's current household demographics (e.g., an average of 2.967 persons per household), the construction of 126 additional residential units on the project site would be expected to result in an increase of approximately 374 net permanent residents. As discussed above, the current officer-to-population ratio is approximately 1.46 officers per 1,000 residents and the current Pacific Community Police Station service area population is approximately 200,000 residents. The additional Proposed Project residents would result in an increase in service area population totaling approximately 200,374

residents. This increase in the total number of service area residents is not large enough to alter the current officer-to-population ratio.[11]

Thus, the new persons introduced to the project site on a daily basis would not require any additional officers in order to maintain the current officer-to-population ratio in the Westchester-Playa del Rey Area. Therefore, as the Proposed Project would not result in a need for new officers to maintain the current officer-to-population ratio, it is not likely that any expansion, consolidation, or relocation of the Pacific Community Police Station would be needed. As buildout of the Proposed Project would not result in the demand for any new, expanded, consolidated, or relocated police facilities, impacts associated with the officer-to-population ratio would be less than significant.

Response Times

As discussed in Section IV.K, Traffic, Transportation, and Parking, with the implementation of the Proposed Project, related projects, and ambient growth, six of the seven study intersections in the project area would operate at LOS D or better during the AM and PM peak hours in the year 2012.

The following study intersection would operate at LOS E or F during the AM or PM peak hour in 2012:

- 83rd Street and Lincoln Boulevard

The above impacted intersection is located along direct travel routes from the Pacific Community Police Station to the project site. However, as previously discussed, police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access the project site when responding to an emergency call. Thus, a police unit accessing the project site from the surrounding area may or may not pass through the impacted study intersection.

As compared to future conditions without the Proposed Project, implementation of the Proposed Project would maintain levels of service during the both the AM and PM peak hour at all study intersections. As previously stated, since it is unknown precisely which route the LAPD would use to access the project site when responding to an emergency call, a police unit may or may not pass through the aforementioned impacted study intersection. Therefore, buildout of the Proposed Project would have a less than significant impact with respect to response times.

Emergency Access

Emergency access to the project site would be provided by the existing and proposed street system. The Proposed Project would be required to be built according to code to ensure proper emergency access. Therefore, impacts on emergency access would be less than significant.

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[11] *292 officers x 1,000 residents = 292,000. 292,000 ÷ 200,374 total service area residents = 1.46 officers per 1,000 residents.*

CUMULATIVE IMPACTS

Implementation of the Proposed Project in combination with ambient growth and the related projects identifies in Section II, Environmental Setting, would further increase the demand for police protection services in the project area. As discussed previously, the Proposed Project is located within the Westchester-Playa del Rey Community Plan Area, which has an existing police service population of approximately 200,000 people. In addition, of the 19 related projects identified, 11 related projects (Related Project Nos. 1, 2, 3, 4, 6, 7, 13, 14, 15, 17, and 19) would also be served by the Pacific Community Police Station. One related project (Related Project No. 5) would be served by the West Los Angeles Community Police Station. The seven remaining related projects (Related Project Nos. 8, 9, 10, 11, 12, 16, and 18) are not located within the City of Los Angeles and would not be served by LAPD. As shown in Table IV.J-3, Estimated Cumulative Police Service Population, the residential population associated with the Proposed Project, ambient growth, and the 11 related projects in the Pacific Community Police Service Area would result in a 24,555-person cumulative increase in the police service population for the Pacific Community Police Station, of which the Proposed Project would comprise approximately 1.4 percent. This cumulative increase in police service population would require approximately 37 additional officers to maintain the existing officer-to-population ratio in the entire Westchester-Playa del Rey Area.[12]

The need for 37 additional officers would not create a need for a new or expanded facility. Similar to the Proposed Project, 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 related project would also contribute additional tax revenue that could be used for commensurate expansion of police services and the hiring of additional police officers. Therefore, cumulative impacts with respect to police protection services would be less than significant.

MITIGATION MEASURES

No mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to police protection services would be less than significant.

[12] *[(24,525 new persons) ÷ (685 persons per officer)] = 37 officers.*

Table IV.J-3
Estimated Cumulative Police Service Population

No.	Location (Address)	Size	Description	Population Generation Rate[a]	Total Service Population (Persons)
1.	SW Corner of Lincoln Boulevard/ Manchester Avenue	Playa del Oro/Furama Redevelopment			
		539 du	Apartment	2.967 persons/unit	1,599
		27,000 sf	Retail	2.2371 employees/1,000 sf	60
		(500) rm	*Hotel (to be removed)*	0.9 employees/room[c]	(450)
		(10,420) sf	*Retail (to be removed)*	2.2371 employees/1,000 sf	(23)
		(10,590) sf	*Office (to be removed)*	3.4965 employees/1,000 sf	(37)
		(4,800) sf	*High-Turnover Restaurant (to be removed)*	2.2371 employees/1,000 sf[g]	(11)
2.	7215 W. Manchester Avenue	4,850 sf	Walk-In Bank	2.2371 employees/1,000 sf[b]	11
3.	6225 W. Century Boulevard	180 du	Hotel	0.9 employees/room[c]	162
4.	7900 South Loyola Boulevard	16 st	Daycare Center	1 employee/13 students[d]	1
6.	5401 Beethoven Street	420 st	Private School	1 employee/13 students[d]	32
7.	8632 Sepulveda Boulevard	3,621 sf	Walk-In Bank	2.2371 employees/1,000 sf[b]	8
13.	12700 Braddock Drive	134,557 sf	Warehouse	2.6954 employees/1,000 sf[e]	363
		1,357 sf	Office	3.4965 employees/1,000 sf	5
		(58,323) sf	*University of CA Laundry Building (to be removed)*	2.2371 employees/1,000 sf[b]	*130*
14.	S of Jefferson Boulevard, E of Lincoln Boulevard	Playa Vista Phase I			
		3,246 du	Condominium	2.967 persons/unit	9,631
		2,142,050 sf	Office	3.4965 employees/1,000 sf	7,490
		25,000 sf	Retail	2.2371 employees/1,000 sf	56
		1,129,900 sf	Production & Staging Support	2.6954 employees/1,000 sf[e]	3,046
		65,000 sf	Community Serving Uses	3.4965 employees/1,000 sf[f]	227
		Playa Vista Phase I – Completed and Occupied			
		(2,166) du	Condominium	2.967 persons/unit	(6,427)
		(221,000) sf	Office	3.4965 employees/1,000 sf	(773)
		(12,500)sf	Retail	2.2371 employees/1,000 sf	(28)

Table IV.J-3 (Continued)
Estimated Cumulative Police Service Population

No.	Location (Address)	Size	Description	Population Generation Rate[a]	Total Service Population (Persons)
15.	S of Jefferson Boulevard, E of Lincoln Boulevard	Playa Vista Phase II			
		175,000 sf	Office	3.4965 employees/1,000 sf	612
		2,600 du	Apartment	2.967 residents/unit	7,714
		150,000 sf	Shopping Center	2.2371 employees/1,000 sf	336
		40,000 sf	Community Serving Uses	3.4965 employees/1,000 sf[f]	140
17.	1 LMU Drive	7,800 st	Loyola Marymount University Master Plan	1 employee/13 students[f]	600
19.	9204 Airport Boulevard	Airport Boulevard Carwash			
		1 site	Car Wash	N/A[h]	N/A
		(15,251) sf	*Car Rental Facility (to be removed)*	2.2371 employees/1,000 sf	(34)
				Related Projects Total	**24,180**
				Proposed Project Net Total	**375**
				Cumulative Total (Related Projects Total + Proposed Project Total)	**24,555**

Note:
Numbers in parentheses are negative numbers.
Uses in italics and parentheses are uses to be removed.

[a] *Number of residents is based on an average of 2.967 persons per household, State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, 2001-2008, with 2000 Benchmark at http://www.dof.ca.gov/HTML/DEMOGRAP/ReportsPapers/Estimates/E5/E5-06/E-5text2.asp*

Except where otherwise noted, employment generation factors are based on Los Angeles Unified School District, School Fee Justification Studies for Los Angeles Unified School District, Table ES-2, September 2002.

[b] *Number of employees was calculated utilizing the "Retail" employment generation factor.*

[c] *Employment generation factor for Hotel uses is based on data in the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition. The factor represents the number of employees per hotel room.*

[d] *The employment generation factor for schools is based on data in the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition. The employment generation factor is based on data collected for estimating the trip generation per employee, student, and square footage on a weekday. The factors also represent the approximate number of square feet or students that would generate one employee (i.e., one employee per 1,000 square feet or one employee per 13 students).*

[e] *Number of employees was calculated utilizing the "Industrial" employment generation factor.*

[f] *Number of employees was calculated utilizing the "Office" employment generation factor.*

[g] *Employment generation factors are based on survey data presented in the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition. The factors represent the number of employees generated per square foot.*

[h] *Number of employees could not be calculated as the square footage of this project was not provided.*

Source: Crain & Associates, June 2008.
Source (Table): Christopher A. Joseph & Associates, June 2008

ENVIRONMENTAL SETTING

Existing Schools

Public schools in the City of Los Angeles are under the jurisdiction of the Los Angeles Unified School District (LAUSD). The LAUSD is divided into eight local districts. The Proposed Project is located within Local District 3. The LAUSD schools that currently serve the project site are listed in Table IV.J-4, LAUSD School Capacity and Enrollment, along with the location, enrollment capacities, 2007-2008 enrollments, and number of students above or below capacity for each of the schools listed.

Schools located in Westchester that would serve the project site are: Loyola Village Elementary School, Wright Middle School, and Westchester Senior High School. The locations of these schools are shown in Figure IV.J-2, Schools Serving the Project Area. As shown in Table IV.J-4, all three schools serving the project site are currently operating below capacity.

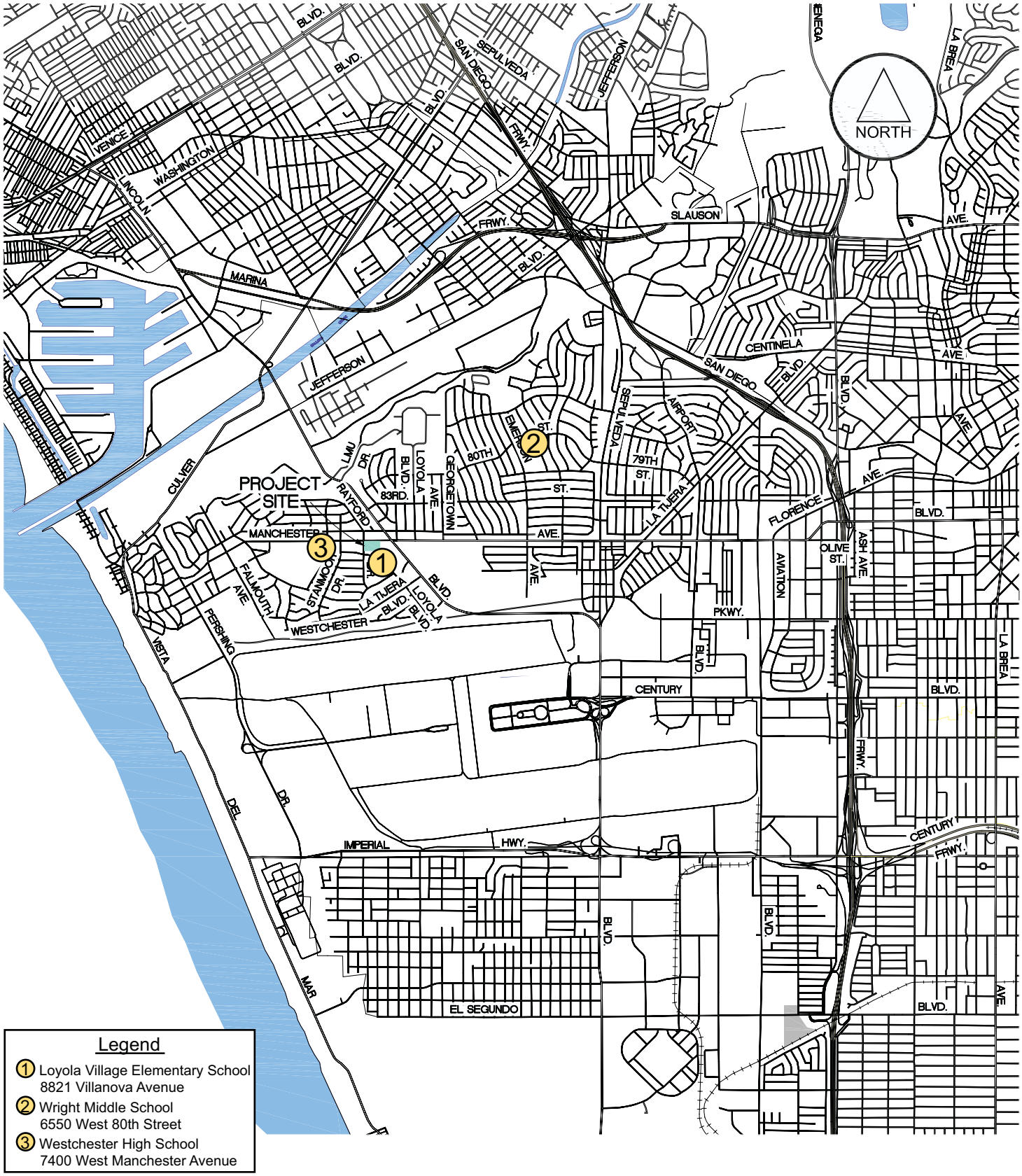
Table IV.J-4
LAUSD School Capacity and Enrollment

School Type (Grade)	School Name	Location	No. of Tracks	Capacity	2008-2009 Actual Enrollment[a]	(-)Under / (+)Over Capacity
Elementary School (Grades K-6)	Loyola Village	8821 Villanova Avenue	1	652	496	-156
Middle School (Grades 7-8)	Wright	6550 W. 80th Street	1	1,305	1,066	-239
Senior High School (Grades 9-12)	Westchester	7400 W. Manchester Avenue	1	2,726	1,830	-896

[a] *Includes magnet center information.*

Source: LAUSD School Profiles, Loyola Village Elementary School, Wright Middle School, and Westchester Senior High School, website: http://search.lausd.k12.ca.us/cgi-bin/fccgi.exe?w3exec=schfinder0, February 3, 2010.

Source (table): Christopher A. Joseph & Associates, February 2010.



Legend

1. Loyola Village Elementary School
   8821 Villanova Avenue
2. Wright Middle School
   6550 West 80th Street
3. Westchester High School
   7400 West Manchester Avenue

Source: Google Earth Pro; Crain & Associates, June 23, 2008.

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Figure IV.J-2
Schools Serving the Project Area

Regulatory Framework

Open Enrollment Policy

Pursuant to Assembly Bill (AB) 149 and AB 2071, the State of California mandates an open enrollment policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the Principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.[13]

School Facilities Fees

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 purposed of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.[14]

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 provision in CEQA or other State or local laws (Government Code Section 65996).

Pursuant to Section 65995.5-7 of the California Government Code, the LAUSD has imposed Level 2 residential developer fees at a rate of $3.87 per square foot of new residential construction, $0.47 per square foot of commercial/industrial space, and $0.09 per square foot of parking structure construction within the boundaries of the LAUSD.[15]

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to schools are determined based on the enrollment and capacity of existing and reasonably foreseeable proposed schools in the project area, and

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[13] *News Release, Los Angeles Unified School District, Office of Communications, April 17, 2000.*

[14] *Los Angeles Unified School District, School Facilities Fee Plan, March 2, 2002.*

[15] *LAUSD Developer Fee Rates, obtained from LAUSD Developer Fee Office, October 2009-2010.*

the number of students that the Proposed Project would generate upon project buildout. Based on these projections, it is determined whether the Proposed Project would exceed the capacity of any existing or proposed schools such that a new or expanded school would be needed.

Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines*, the Proposed Project would have a significant impact on school services if it would:

(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance levels for the Proposed Project's impacts on school services shall be made on a case-by-case basis, considering the following factors:

(a) The population increase resulting from the Proposed Project, based on the increase in residential units or square footage of non-residential floor area;

(b) The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the Proposed Project's proportional contribution to the demand;

(c) Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and

(d) Whether the Proposed Project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

Project Impacts

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 units,

resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

As shown in Table IV.J-5, Estimated Student Generation, the Proposed Project would generate a net total of approximately 52 students, including 26 elementary school students, 13 middle school students, and 13 high school students over baseline conditions.

Table IV.J-5
Estimated Student Generation

Land Use	Size	School Type	Student Generation Factor[a]	Total Students Generated
Proposed Project				
Residential/Live/Work Units	260 units	Elementary School (K-5)	0.2042	53
		Middle School (6-8)	0.0988	26
		High School (9-12)	0.0995	26
			Proposed Project Subtotal	***105***
Less Baseline Conditions				
Existing Retail	24,000 sf	Elementary School (K-5)	0.0000149	0
		Middle School (6-8)	0.0000069	0
		High School (9-12)	0.0000067	0
Previously-Approved Residential Building	134 units	Elementary School (K-5)	0.2042	27
		Middle School (6-8)	0.0988	13
		High School (9-12)	0.0995	13
			Baseline Conditions Subtotal	***53***
			Net Increase in Student Generation Over Baseline	**52**
			Elementary School Students	*26*
			Middle School Students	*13*
			High School Students	*13*

Note: The number of students has been rounded to the nearest whole number.
[a] *Los Angeles Unified School District, Student Generation Rate Calculation, August 2006.*
Source (table): Christopher A. Joseph & Associates, January 2009.

It is likely that some of the students generated by the Proposed Project already reside in areas served by LAUSD and are already enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Proposed Project would be new to LAUSD. As previously discussed, none of the schools serving the project site are operating at or above capacity. The addition of 26 new elementary school students to Loyola Village Elementary School would not result in the school reaching or surpassing its capacity for students. Also, the addition of 13 middle school students and 13 high school students to Wright Middle School and Westchester High School would not result in either school reaching or surpassing their capacities for students. Further, pursuant to the California Government Code, payment

of school facilities fees would, by law, mitigate any impacts resulting from buildout of the Proposed Project. As such, with payment of school facilities fees, impacts to school services as a result of the buildout of the Proposed Project would be less than significant.

CUMULATIVE IMPACTS

Implementation of the Proposed Project in combination with ambient growth and the related projects identified in Section II, Environmental Setting, would increase demands on school services. There are a total of 19 related projects. Eight of the 19 related projects do not have the potential to generate any elementary school, middle school, or high school students (Related Project Nos. 2, 4, 5, 6, 7, 16, 17, and 19). Additionally, due to the various locations of the projects that have the potential to generate elementary school, middle school, or high school students, not all of the students generated by the related projects would attend the same schools as students generated by the Proposed Project. Eight related projects (Related Project Nos. 4, 8, 9, 10, 11 12, 13, and 15) would not generate any students at the schools serving the Proposed Project. Two related projects (Related Project Nos. 10 and 11) are outside the school attendance boundaries for the schools serving the Proposed Project. Further, one related projects (Related Project No. 18) is not located within the boundaries of the LAUSD and, therefore, would not be served by LAUSD schools. The two remaining related projects that have the potential to generate students would produce a total of approximately 398 elementary school students, 191 middle school students, and 191 high school students that would attend the same local elementary, middle, and senior high schools as those generated by the Proposed Project. As shown in Table IV.J-6, Estimated Related Projects Student Generation, the Proposed Project, in conjunction with the 19 related projects, has the potential to generate an approximate total of 424 elementary school students, 204 middle school students, and 204 high school students.

Similar to the Proposed Project, it is likely that some of the students generated by the related projects already reside in areas served by the LAUSD and are already enrolled in LAUSD schools. For a conservative analysis, however, it is assumed that all of the students generated by the related projects would be new to the LAUSD.

The related projects would generate additional students at Loyola Village Elementary School, Wright Middle School, and Westchester High School. As shown in Table IV.J-7, the Proposed Project in combination with the related projects would not cause Wright Middle School or Westchester High School to exceed their student capacities. Enrollment at Loyola Village Elementary School would exceed capacity by approximately 140 students. However, this is a conservative estimate as it is likely that not all of the elementary students generated by the Proposed Project in conjunction with the identified related projects would attend Loyola Village Elementary School. Specifically, as shown in Table IV.J-6 above, Related Project No. 14 is anticipated to generate a majority of the new elementary school students. However, Central Regional Elementary School #22 is planned to be built at Playa Vista with a capacity of

Table IV.J-6
Estimated Related Projects Student Generation

Map No.	Location (Address)	Size	Description	Elementary Students	Middle School Students	High School Students	Total Students[a]
1.	SW Corner of Lincoln Boulevard/Manchester Avenue	Playa del Oro/Furama Redevelopment					
		539 du	Apartment	110	53	54	217
		27,000 sf	Retail	0	0	0	0
		(500) rm	*Hotel (to be removed)*	N/A	N/A	N/A	N/A[b]
		(10,420) sf	*Retail (to be removed)*	0	0	0	0
		(10,590) sf	*Office (to be removed)*	0	0	0	0
		(4,800) sf	*High-Turnover Restaurant (to be removed)*	0	0	0	0
14.	S. of Jefferson Boulevard, E. of Lincoln Boulevard	Playa Vista Phase I					
		3,246 du	Condominium	663	321	323	1,307
		2,142,050 sf	Office	50	23	22	95
		25,000 sf	Retail	0	0	0	0
		1,129,900 sf	Production & Staging Support[c]	20	9	9	38
		65,000 sf	Community Serving Uses[d]	2	1	1	4
		Playa Vista Phase I – Completed and Occupied					
		(2,166) du	Condominium	(442)	(214)	(216)	(872)
		(221,000) sf	Office	(5)	(2)	(2)	(9)
		(12,500) sf	Retail	0	0	0	0
			Total Students	**398**	**191**	**191**	**780**
			Proposed Project Net Total	**26**	**13**	**13**	**52**
			Cumulative Total	**424**	**204**	**204**	**832**

Notes: Uses listed in italics and parentheses are uses to be removed.
[a] *Student generation rates are based on Los Angeles Unified School District, Student Generation Rate Calculation, August 2006.*
[b] *Student generation rates do not exist for these land uses or are not available in the units provided.*
[c] *Number of students was calculated utilizing the "Industrial" student generation rate.*
[d] *Number of students was calculated utilizing the "Office" student generation rate.*
Source: Crain & Associates, January 2009,
Source (table): Christopher A. Joseph & Associates, March 2010

650 students, relieving the demand on Loyola Village Elementary School.[16] Thus, the new students generated from Related Project No. 14 would be expected to attend the new elementary school, rather than Loyola Village Elementary School. Furthermore, similar to the Proposed Project, the applicants of the related commercial and residential projects would be expected to pay required developer school fees to the LAUSD (pursuant to SB 50) to help reduce any impacts they may have on school services. Pursuant to SB 50, payment of developer fees is deemed to provide full and complete mitigation of school facilities impacts. The payment of these fees by the Proposed Project and the related projects would be mandatory, and would further reduce the cumulative impact upon school services to a less than significant level.

Table IV.J-7
Cumulative Impacts on LAUSD Schools
Serving the Proposed Project

School	Projected Capacity[a]	Projected Enrollment[b]	Cumulative Students		Projected Enrollment with Cumulative Students	(-) Under/ (+) Over Capacity
			Proposed Project Students	Related Project Students		
Loyola Village Elementary School	678	394	26	398	818	+140
Wright Middle School	1,422	684	13	191	888	-534
Westchester Senior High School	2,765	1,452	13	191	1,656	-1,109

[a] *Capacity based on implementing operational goals such as full-day kindergarten and class-size reduction.*
[b] *Based on 2008-2009 LAUSD student enrollment history.*
Source: Letter Correspondence with Glenn Striegler, Environmental Assessment Coordinator, Los Angeles Unified School District, Office of Environmental Health and Safety, April 30, 2008.
Source (table): Christopher A. Joseph & Associates, February 2010.

MITIGATION MEASURES

Because no significant school impacts have been identified, no mitigation measures are required. However, the City requires implementation of following standard measure to ensure that any impacts are minimized:

J-4. The applicant shall be required to pay LAUSD developer school fees to the satisfaction of the administering agency.

[16] *Los Angeles Unified School District, Facilities Services Division, Strategic Execution Plan, January 2009, Exhibit D, K-12 Schools, page 100.*

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to school facilities and services would be less than significant.

ENVIRONMENTAL SETTING

Existing Parks and Recreational Facilities

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally-owned and operated recreation and park facilities within the City, which include approximately 15,710 acres of parkland between 390 neighborhood and regional parks, nine lakes, 176 recreation centers, 372 children's play areas, 13 golf courses, 287 tennis courts, nine dog parks, 59 swimming pools, seven skate parks, seven museums, 24 child care facilities, 30 senior centers, two beaches, and an urban forest containing approximately one million trees.[17]

The Westchester-Playa del Rey Community Plan designates approximately 125 acres as parkland, including one Regional Park, one Community Park, and one Neighborhood Park.[18] About 30 acres of additional new parkland is planned within the Playa Vista mixed-use development in a number of Neighborhood Parks scattered throughout the development. Additionally, a number of existing and planned open space and recreational facilities serving the community are located within the jurisdiction of LAX, including: Neilson Field, Vista del Mar Park, Westchester Golf Course, and a proposed new golf course between Pershing Drive and Vista del Mar south of Waterview Street.[19] Table IV.J-8 lists the approximate eight recreational facilities located within the Westchester-Playa del Rey Community Plan Area. The Westchester Community Plan Area provides approximately 2.44 acres of open space and recreation per 1,000 people based on the 2000 Census Community Plan Area population of 51,254 residents.[20, 21]

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[17] *City of Los Angeles, Department of Recreation and Parks, Department, A Message From the General Manager, website: http://www.laparks.org/dept.htm, May 13, 2008.*

[18] *Westchester-Playa del Rey Community Plan, Chapter III, Land Use Plan Policies and Programs, Recreation and Park Facilities.*

[19] *Westchester-Playa del Rey Community Plan, Chapter III, Land Use Plan Policies and Programs, Recreation and Park Facilities.*

[20] *City of Los Angeles, Department of City Planning, Demographics Research Unit, Statistical Information, Census 2000, By Community Plan Area, Westchester Community Plan Area, website: http://cityplanning.lacity.org/DRU/C2K/C2KPfl.cfm?&geo=cp&loc=Wch, May 19, 2008.*

[21] *[(51,254 residents) ÷ (1,000)] = 51.254 thousand residents. [(125 acres of parkland) ÷ (51.254 thousand residents)] = 2.44 acres of parkland per 1,000 people.*

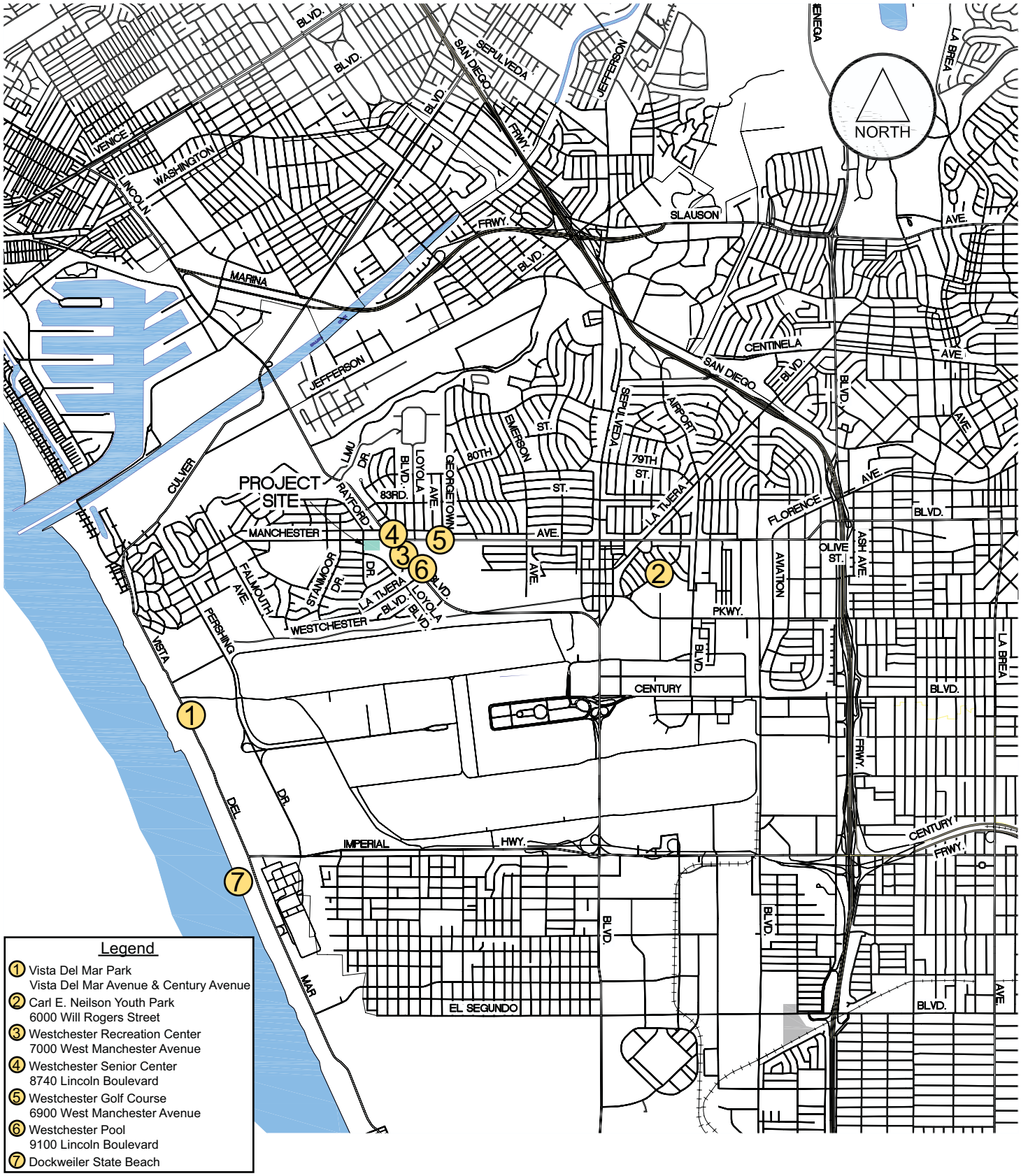
As shown in Table IV.J-8, the Proposed Project is located within the 2.0-mile service radius of Vista del Mar Park, Carl E. Neilson Youth Park, Westchester Recreation Center, Westchester Senior Center, Westchester Golf Course, and Westchester Pool. The project site is also located within 1.5 miles of Dockweiler State Beach. The locations of these parks are shown in Figure IV.J-3, Recreational Facilities Serving the Project Area.

Table IV.J-8
Westchester-Playa del Rey Community Plan Area Parks and Recreation Facilities

Park/Recreation Facility Name	Location	Approximate Distance to Project Site (miles)	Service Radius (miles)
Neighborhood Parks			
Del Rey Lagoon	6660 Esplanade Place	1.58	0.5
Community Parks			
Vista del Mar Park	Vista del Mar Avenue and Century Boulevard	1.48	2.0
Carl E. Neilson Youth Park	6000 Will Rogers Street	1.81	
Recreation Centers			
Westchester Recreation Center	7000 West Manchester Avenue	0.16	2.0
Senior Citizen Centers			
Westchester Senior Center	8740 Lincoln Boulevard	0.19	2.0
Golf Courses			
Westchester Golf Course	6900 West Manchester Avenue	0.48	2.0
Aquatic Facilities			
Westchester Pool	9100 Lincoln Boulevard	0.31	2.0
Regional Parks			
Dockweiler State Beach	N/A	1.50	Entire Los Angeles Basin

Source: Christopher A. Joseph & Associates, May 2008.

The Westchester-Playa del Rey Community Plan Area had a population of 51,254 residents in 2000 and currently designates approximately 125 acres as parkland. Based on the City's short-range standard of 2.0 acres of parkland per 1,000 residents, the Community Plan Area is required to have 102 acres of parkland. Therefore, the Westchester-Playa del Rey Community Plan Area currently provides approximately 21 percent more parkland than is required.



Legend

1. Vista Del Mar Park
   Vista Del Mar Avenue & Century Avenue
2. Carl E. Neilson Youth Park
   6000 Will Rogers Street
3. Westchester Recreation Center
   7000 West Manchester Avenue
4. Westchester Senior Center
   8740 Lincoln Boulevard
5. Westchester Golf Course
   6900 West Manchester Avenue
6. Westchester Pool
   9100 Lincoln Boulevard
7. Dockweiler State Beach

Source: Google Earth Pro; Crain & Associates, June 23, 2008.

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Figure IV.J-3
Recreational Facilities
Serving the Project Area

Regulatory Framework

City of Los Angeles

Parkland Fees

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 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.

Furthermore, pursuant to Section 12.33 of the LAMC, developers are allowed to pay fees instead of providing parkland for development. Payment of fees would help fund capital improvement projects, upgrades to existing recreational facilities, and acquisition and development of new park and recreation facilities in the vicinity of a project site.

Code Required Open Space

The City of Los Angeles Code (LAMC) provides 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 would be classified as park or recreational facilities under the City's Parkland fee program (discussed above), under 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.

Pursuant to LAMC Section 12.21 (G), new construction in the City of six or more dwelling units on a lot is required to provide at a minimum 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms. Usable open space is defined as area which is designed and intended to be used for active or passive recreation, is open to the sky, and has no structures that project into the common open space area. Usable open space may consist of private and/or common area open space; however, common open space areas must be a minimum of 400 square feet and must constitute at least 50 percent of the total open space provided. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area is required to be planted with ground cover, shrubs, or trees and at least on 24-inch box tree is required for every four dwelling units.

General Plan Framework Element

The City's General Plan Framework Element categorizes parks into three types: neighborhood, community, and regional. Ideally, neighborhood parks are five to ten acres in size and have a service radius of approximately 0.5 miles, and a minimum of two acres of neighborhood parkland should be

provided for every 1,000 residents with equal distribution throughout the City. Community parks are ideally 15 to 20 acres and have a service radius of two miles. A minimum of two acres of community parkland should be provided for every 1,000 residents with equal distribution throughout the City. Regional parks in the City are ideally greater than 50 acres, provide specialized recreational facilities and/or attractions, and have a service radius encompassing the entire Los Angeles region. A minimum of six acres of regional parkland should be provided for every 1,000 residents with equal distribution throughout the City.[22]

The General Plan Framework Element provides the City's standard long-range (minimum) ratios for parks to population. The City's standard minimum ratio of parks to population is two acres per 1,000 residents for neighborhood parks, one acre per 1,000 residents for community parks, and four acres per 1,000 residents of combined neighborhood and community parks. However, the City's Public Recreation Plan notes that these long-range standards may not be reached during the life of the plan and, therefore, include more attainable short-term and intermediate-range standards of one acre per 1,000 residents for neighborhood and community parks, or two acres per 1,000 residents combined.

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in the project area to accommodate the Proposed Project's needs for such facilities. This is calculated based on the City's recommended ratios for parkland to population as well as project-specific recommendations of the LADRP. Based on this evaluation, it is determined whether the Proposed Project would create substantial demands on existing parks and recreational facilities such that new or expanded parks and recreational facilities would be needed either on- or off-site.

Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines*, the project would have a significant impact on recreation and parks services if it would:

(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of park services.

[22] *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.*

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide,* the determination of significance for the Proposed Project's impact on recreation and parks services shall be made on a case-by-case basis, considering the following factors:

(a) The net population increase resulting from the Proposed Project;

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

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

Project Impacts

As discussed in Section III, Project Description, Development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant is proposes to construct the Proposed Project, which comprises 260 units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

The design of the Proposed Project includes a 1,400 square foot multi-purpose room/gym area, as well as a pool and landscaped common areas. It is estimated that the Proposed Project would generate approximately 374 additional residents (see Section IV.I, Population, Housing, and Employment). As there are no existing residential units on the project site, the estimated number of additional residents generated is also the net increase in population that would create demand for parks and recreation facilities.

City of Los Angeles – Code Required Open Space

The Proposed Project would include 1,400 square feet of common open space and recreation space, which would meet the amount of open space required for the Proposed Project. Pursuant to LAMC Section 12.21(G), the Proposed Project would be required to provide 100 square feet of open space for each unit with less than three habitable rooms, 125 square feet for each unit with three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. The Proposed Project would include

58,437 square feet of common open space and recreation space. Under LAMC Section 12.21(G), the Proposed Project would be required to provide 28,275 square feet of open space.[23] Therefore, the Proposed Project would meet LAMC open space requirements. However, not all areas designated as open space in the LAMC would qualify as park or recreational facilities under the City's Parkland fee program. Nonetheless, pursuant to Section 12.33 of the LAMC, the project applicant would be required either to dedicate the parkland or to pay fees in lieu of parkland dedication. Payment of fees would help fund capital improvement projects, upgrades to existing recreational facilities, and acquisition and development of new park and recreation facilities in the vicinity of the project site. Furthermore, the vicinity of the project site is already well-served by parkland exceeding the City's short-term acreage standard. With the provision of project recreation and open space and the payment of appropriate in-lieu fees, the Proposed Project would have a less than significant impact to park and recreation facilities.

CUMULATIVE IMPACTS

Implementation of the Proposed Project in conjunction with the related projects identified in Section II, Environmental Setting, would further increase demands on park services. Employees generated by commercial projects would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities. However, the increase in residential population by the related projects would increase the demand on parks and 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. In accordance with *State CEQA Guidelines* Section 15130(a)(3), the Proposed Project's contribution to the cumulative impact would be rendered less than cumulatively considerable through adherence to the City's impact fee program for new development. Adherence to the requirements of this program would constitute implementation or funding of the Proposed Project's fair share of measures designed to alleviate the cumulative impact.

MITIGATION MEASURES

With payment of park fees pursuant to LAMC Section 21.10.3(a)(1), impacts would be less than significant and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of fees, impacts related to recreation and parks services would be less than significant.

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[23] *169 units having fewer than three habitable rooms x 100 sf = 16,900 sf. 91 units having three habitable room x 125 sf = 11,375 sf. 16,900 sf + 11,375 sf = 28,275 sf of open space required.*

ENVIRONMENTAL SETTING

Existing Library Facilities

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, and 71 community branches.[24] According to the L.A. CEQA Thresholds Guide (2006), approximately six 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.[25] The libraries that would serve the Proposed Project are the Westchester-Loyola Village Branch Library and the Playa Vista Branch Library. The locations of these libraries are shown in Figure IV.J-4, Libraries Serving the Project Area.

The Los Angeles Public Library Branch Facilities Plan (the 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.[26] The goals of the Plan were implemented with money received by two bond issues: Phase I of the Plan was implemented with funds from the 1989 Bond Program and Phase II by the 1998 Bond Program. Under the two bond programs, 64 library facilities have been renovated or built.[27]

All of the projects identified under the Plan have now been completed.[28] At present, the Plan is going through a process of revision in which the list of projects for the LAPL through the year 2030 will be updated.

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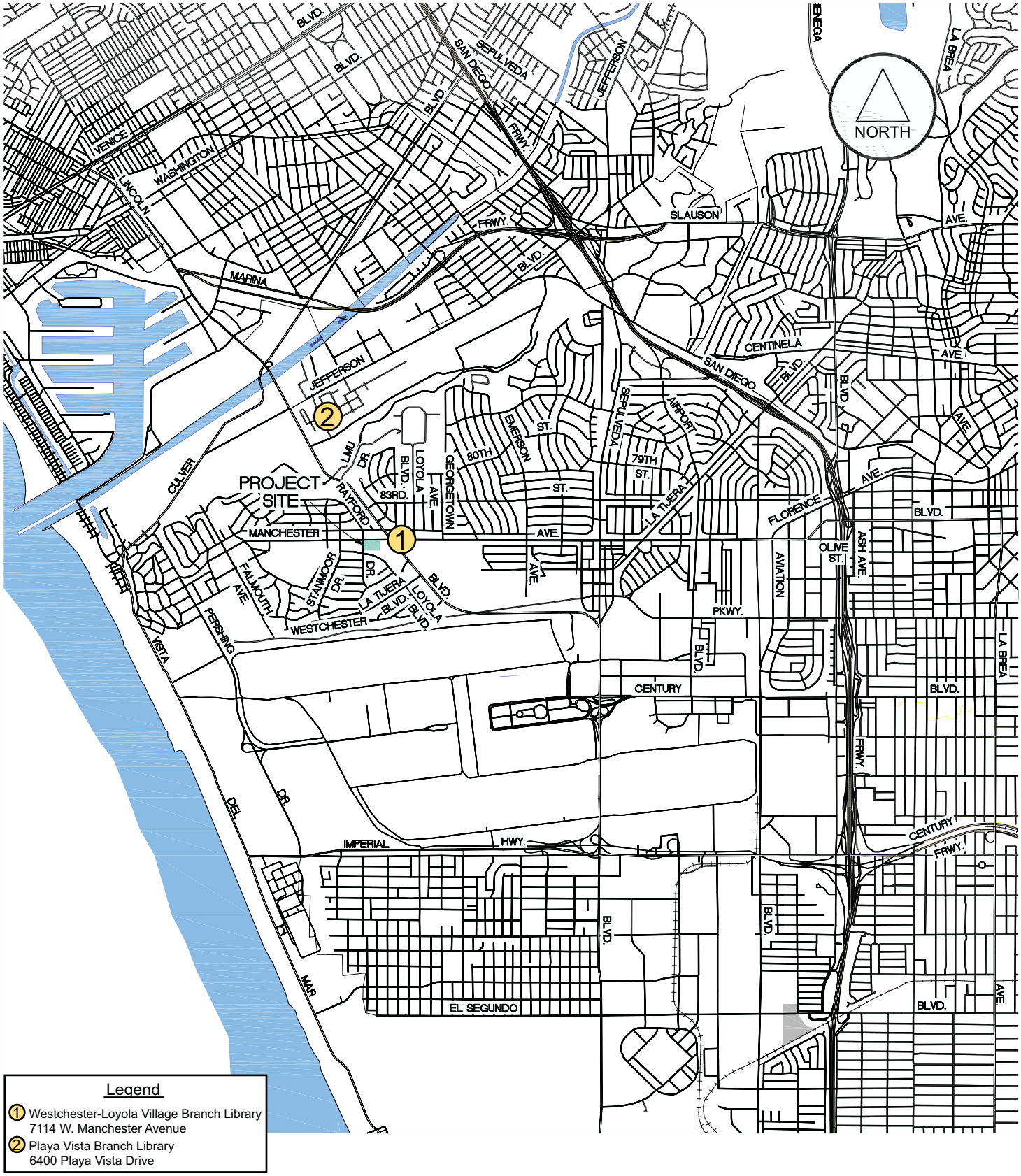
[24] *Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2007-2010, page 21, website: http://www.lapl.org/about/Strategic_Plan.pdf, .August 3, 2009.*

[25] *City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, January 1995.*

[26] *Los Angeles Public Library, Summary of Branch Facilities Plan Revision, Background, website: http://www.lapl.org/about/planning_overview.html, .August 3, 2009.*

[27] *Los Angeles Public Library, Summary of Branch Facilities Plan Revision, Background, website: http://www.lapl.org/about/planning_overview.html, .August 3, 2009.*

[28] *Los Angeles Public Library, Summary of Branch Facilities Plan Revision, Background, website: http://www.lapl.org/about/planning_overview.html, .August 3, 2009.*



Legend

1. Westchester-Loyola Village Branch Library
   7114 W. Manchester Avenue
2. Playa Vista Branch Library
   6400 Playa Vista Drive

Source: Google Earth Pro; Crain & Associates, June 23, 2008.

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Figure IV.J-4
Libraries Serving the Project Area

The Plan's site selection criteria included: branch building size standards of 10,500-square-foot facilities for communities with populations less than 50,000 and 12,500square-foot facilities for communities with populations greater than 50,000. In February 2007, a revision to the existing Plan was adopted by the Board of Library Commissioners. The updated version of the Site Selection Guidelines, now called The Criteria for New Libraries, proposes building larger libraries. The recommended sizes are now 12,500-square-foot facilities for communities with populations less than 45,000 and 14,500-square-foot facilities for communities with populations greater than 45,000. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for that area.[29] The State of California also has standards that apply to libraries. According to the State, 0.5 square feet of library facility per capita should be provided. The State standard for library volumes is two per capita.[30]

Westchester-Loyola Village Branch Library

The Westchester-Loyola Village Branch Library is located at 7114 W. Manchester Avenue, approximately 0.08 miles east of the project site, and would serve the Proposed Project. At present, the Library is 12,500 square feet and serves a population of approximately 39,714 residents.[31] According to data provided by the City of Los Angeles Planning Department, the same service area, which encompasses the project site, had approximately 41,945 residents in 2005 and the population is estimated to reach 45,411 residents by the year 2010.[32] This branch serves the residents in the Westchester-Playa del Rey Community. At 12,500 square feet, the Library adequately meets the current demand for library services in the community. The Westchester-Loyola Village Branch Library is open Monday through Saturday. Currently, the Library houses approximately 38,000 volumes and is staffed with 12 employees. It currently runs programs for children, teens, adults, and Spanish speakers. The Westchester-Loyola Village Branch Library also provides free wireless internet access. As with all branches 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, language learning tools, access to an historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.

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[29] *All of the projects identified under the Plan have now been completed.[29] At present, the Plan is going through a process of revision in which the list of projects for the LAPL through the year 2030 will be updated.*

[30] *City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, pages 2.13-1 & 2.13-2, January 1995.*

[31] *Letter correspondence with Rona Berns, Senior Management Analyst, Library Facilities Division, Los Angeles Public Library, July 9, 2008.*

[32] *Letter correspondence with Rona Berns, Senior Management Analyst, Library Facilities Division, Los Angeles Public Library, July 9, 2008.*

Playa Vista Branch Library

The Playa Vista Branch Library is located at 6400 Playa Vista Drive, approximately 0.67 miles northwest of the project site, and would serve the Proposed Project. The Playa Vista Branch Library serves a population of approximately 40,000 residents within the Westchester-Playa del Rey Community. It is likely that the service populations for the Westchester-Loyola Village and the Playa Vista Branch Libraries overlap somewhat. As discussed, both libraries would serve the Proposed Project. Due to its service population, the Playa Vista Branch Library is 10,500 square feet and can accommodate a population of up to 50,000 residents. The Playa Vista Branch Library is open Monday through Saturday. This Library houses over 100,000 volumes. It presently runs programs for children, teens, and adults and Spanish speakers. The Playa Vista Branch Library also provides free wireless internet access. Like all branches of the Los Angeles Public Library, 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 historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.

Regulatory Framework

The City library policy is guided by the Los Angeles Public Library Branch Facilities Plan, an element of the City of Los Angeles General Plan. The Plan guides the construction, maintenance, and operation of public libraries and specifies standards in defining geographic service area and facility size. The LAPL Branch Facilities Plan, adopted by the Board of Library Commissioners in August 1988 (revised February 2007), contains the required facilities expansion needs of the City Public Library system. According to the LAPL Branch Facilities Plan, service criteria are based on floor area required to serve varying amount of residential population. Current LAPL regional branch building size standards are presented in Table IV.J-9 below.

As discussed above, the LAPL Branch Facilities Plan, adopted by the Board of Library Commissioners February 2007, recommends building a 12,500 square-foot facility for branches serving a population of over 50,000 residents. At 12,500 square feet, the Westchester-Loyola Village Branch Library meets the criteria for serving a population of over 50,000 people.

Table IV.J-9
LAPL Branch Facilities Site Selection Criteria

Population Served	Size of Facility in square feet (sf)	Property Required in square feet (sf)
Above 50,000	12,500	32,500
Below 50,000	10,500	27,500
Expansion or Special Situation[a]	Special Size	n/a
Regional Branch	20,000	52,000

Due to available property size and configuration, architectural constraints or opportunities, or building code requirements, some facilities may differ from the recommended sizes.
Source: City of Los Angeles LA CEQA Thresholds Guide 2006, Section K.5 Libraries, Exhibit K.5-1, page K.5-5.

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to libraries are determined based on the population of the serving libraries' service area and the ability for existing libraries to serve the project vicinity, which is based on the number of patrons and residents that the Proposed Project would generate upon project buildout. Based on these projections, it is determined whether the Proposed Project would exceed the capacity of any existing or proposed libraries such that a new or expanded library or libraries would be needed.

Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines*, the Proposed Project would have a significant impact on library services if it would:

(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance levels for the Proposed Project's impacts on library services shall be made on a case-by-case basis, considering the following factors:

(a) The net population increase resulting from the Proposed Project;

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

(c) Whether the Proposed Project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the LAPL).

Project Impacts

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-

unit building, the Applicant is proposes to construct the Proposed Project, which comprises 260 units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

The Westchester-Loyola Village and Playa Vista Branch Libraries would serve the library needs of the Proposed Project. As discussed in Section IV.I, Population, Housing, and Employment, the Proposed Project is expected to generate approximately 374 additional residents. Based on the library-sizing criteria in the Plan described previously, both libraries serving the project would have enough square footage capacity to accommodate the additional residential population associated with the project. Therefore, project impacts related to library services would be less than significant.

CUMULATIVE IMPACTS

Implementation of the Proposed Project in combination with the related project identified in Section II, Environmental Setting, would be expected to further increase demand for library services in the project vicinity. However, 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 19 related projects, nine would be served by the Westchester-Loyola Village Branch Library (Related Project Nos. 1-5, 7, and 17-19). Nine related projects (Related Project Nos. 6, 8, and 10-16) would be served by the Playa Vista Branch Library and one related project (Related Project No. 9) would be served by the Venice-Abbot Kinney Memorial Branch Library. In general, the employees and students that would be generated by the related projects would not be expected to patronize local libraries to a great extent, as they typically would not have long periods of time during their work or school days to visit library facilities and would be more likely to use libraries near their homes during non-work or non-school hours. Further, Related Project Nos. 4 and 17 are located on the Loyola Marymount University campus, which has its own university library facilities. Thus, only the related projects that would generate residents are utilized for this cumulative analysis. Of the nine related projects that would be served by the Westchester-Loyola Village Branch Library, one includes a residential component (Related Project No. 1).

As shown in Table IV.J-10, Cumulative Residents Generated, the Proposed Project, in combination with the related project containing a residential component, would result in a cumulative increase of 1,974 residents who would demand library services. As with the Proposed Project, the related projects would be subject to LAPL review to determine if the residential populations generated by these projects would be within the maximum service population for the libraries serving the projects and whether payment of fees would be necessary to reduce the level of impact on library facilities. Through this process, cumulative impacts to library facilities would be less than significant.

Table IV.J-10
Cumulative Residents Generated

No.	Location (Address)	Size	Description	Generation Rate[a]	No. of Residents Generated
1.	SW Corner of Lincoln Blvd/Manchester Ave.	539 du	Apartment	2.967 persons /unit	1,599
				Related Projects Total	**1,599**
				Proposed Project Net Total	**375**
				Cumulative Total (Related Projects Total + Proposed Project Total)	**1,974**

[a] *Number of residents is based on an average of 2.967 persons per household, State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, 2001-2008, with 2000 Benchmark at http://www.dof.ca.gov/HTML/DEMOGRAP/ReportsPapers/Estimates/E5/E5-06/E-5text2.asp*

Source: Crain & Associates, June 2008.
Source (table): Christopher A. Joseph & Associates, June 2008.

MITIGATION MEASURES

Because no significant impacts to library services were identified, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to library services would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
K. TRAFFIC, TRANSPORTATION, AND PARKING

INTRODUCTION

This section evaluates the potential traffic, transportation, and parking impacts associated with the Proposed Project. The following analysis is based upon the *Traffic Impact Study for the Project at Lincoln Boulevard/Manchester Avenue (7280-7298 W. Manchester Avenue), City of Los Angeles*, prepared by Crain & Associates, January 2009. A copy of this report is included as Appendix H to this Draft EIR.

In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which comprises 260 units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the traffic study analyzes the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site. For an explanation of the traffic analysis, the reader is referred to Appendix I (LADOT Traffic Assessment) to this Draft EIR.

ENVIRONMENTAL SETTING

The project site is located in the Westchester-Playa del Rey Community Plan area of the City of Los Angeles. Generally, the area surrounding the project site is developed with single- and multi-family residences as well as commercial and recreational uses and associated surface parking. The project site is generally bounded by Manchester Avenue to the north, the Playa del Oro mixed-use development, which is currently under construction, to the east, single-family residences to the south, and Rayford Drive to the west.

As part of the environmental review for the previously-approved Playa del Oro project the City approved a traffic impact study and found that potentially significant traffic impacts could be mitigated to an acceptable level. The mitigation measures for the Playa del Oro are set forth in Table IV.K-1. Because the potential traffic impacts associated with the 539-unit Playa del Oro project have been identified and mitigated, the Playa del Oro project is treated as a baseline condition for purposes of this analysis.

The project site is located within the Coastal Transportation Corridor Specific Plan bound by the City of Santa Monica on the north, Imperial Highway on the south, San Diego Freeway on the east, and Vista Del Mar on the west. As described in the Community Plan, the Specific Plan is a Transportation Plan implemented to fund specific transportation improvements due to transportation impacts generated by the

Table IV.K-1
Traffic Mitigation Measures for Playa del Oro

(T) Conditions of Approval T-1
3. ***Transportation Improvements***. The developer shall implement measures detailed in a communication by the Department of Transportation, dated October 14, 2003, to the Department of City Planning, in conjunction with Case No. ENV 2002-7628 MND. The Improvements shall include but not be limited to the following: a. The project shall dedicate 18-feet along the Lincoln Boulevard frontage of the subject property and widen the existing 40-foot half roadway to a width of 56-feet to bring the roadway up to the standard required by the General Plan. b. The project shall dedicate 7-feet along the project ownership's frontage on Manchester Avenue, and widen the roadway on the southerly side by 4-feet and 8-feet. The 4-foot widening will be along the existing 41-foot half roadway section and the 8-foot widening will be over the existing 28-foot half roadway section and in the vicinity of the existing median island. Do not remove the median island except for the nose portion as required under "T" Condition 3.c. Construct concrete curb, gutter, sidewalk with tree wells and plan trees in conjunction with the roadway widening. c. Remove the nose portion of the raised median island on Manchester Avenue, east of Lincoln Boulevard; remove the painted chevron island on Manchester Avenue, west of Lincoln Boulevard; restripe Manchester Avenue in order to provide an additional eastbound and westbound left-turn lanes on Manchester Avenue at Lincoln Boulevard. Modify and relocate traffic signal, striping, sign catch basins, utilities, etc. as necessary. d. Pursuant to Section 5.G of the Coastal Transportation Corridor Specific Plan (CTCSP), the applicant shall submit a Transportation Demand Management (TDM) program to DOT prior to the issuance of any building permit. The project must also comply with Section 12.26 J (Ordinance No. 168,700 of the Municipal code which requires specific TDM and trip reduction measures before the issuance of any building permit. e. If it is determined by DOT that the Lincoln Corridor Task Force (LCTF) Improvements should supercede the proposed residential mixed-use project improvements, the applicant shall make a fair-share contribution towards the implementation of the LCTF improvements in an amount not to exceed the cost to implement the proposed residential mixed-use project improvements. The cost of fair-share contribution by the applicant should be determined at a later date when and if it is determined that the LCTF improvements are more appropriate to implement.
(Q) Qualified Conditions of Approval Q-9
32. ***Coastal Transportation Corridor Plan***. Prior to issuance of demolition/building permits, the Project shall comply with applicable requirements of the Coastal Transportation Corridor Specific Plan, Ordinance No. 168,999, to the satisfaction of the Department of Transportation.
Site Plan Condition of Approval C-2
11. ***Neighborhood Protection Plan (Traffic)***. Prior to the issuance of any building permit for work authorized pursuant to this approval, the property owner shall guarantee the necessary funding of the Neighborhood Protection Plan through cash or irrevocable letter of credit, payable to the Department of Transportation. The maximum amount required of the property owner to fund possible neighborhood protection improvements deemed necessary by the Department of Transportation and Department of City Planning is $75,000. In the event the Plan is guaranteed by cash, the Department of Transportation shall deposit the monies in an interest bearing account and shall provide the property owner with an annual statement reflecting interest earned and payments made. Upon the expiration of a five-year period from the issuance of the last certificate of occupancy for the project, any unused portion of these funds shall be refunded to the owner.

area's projected new commercial development. Furthermore, the project site is also located within the Airport Corridor Boundary, which outlines the LAX boundary area where the Los Angeles World Airports can build. The Proposed Project's consistency with the Coastal Transportation Corridor Specific Plan is analyzed in greater detail in Section IV.G, Land Use and Planning, of this Draft EIR.

The streets and highways in this area serve many high activity uses, including the Los Angeles International Airport (LAX), the community of Marina del Rey, Loyola Marymount University, the Playa Vista development, and the beach, resulting in high traffic volumes within and throughout the area. Project site access is primarily expected via the San Diego Freeway (I-405), the Century Freeway (I-105), and the surface streets and highways discussed below.

Freeways

The San Diego Freeway (Interstate 405) is approximately three miles east of the project site. It extends from the northern part of the San Fernando Valley, through Los Angeles County and into Orange County. It generally provides four lanes in each direction, as well as high-occupancy vehicle (HOV) lanes along much of its route. In the study area, the San Diego Freeway generally runs north-south and interchanges with the Century (I-105) and Marina (SR-90) Freeways. It has full or partial ramp connections with arterials Jefferson Boulevard, Sepulveda Boulevard, Howard Hughes Parkway, La Tijera Boulevard, Florence Avenue, Manchester Avenue, Century Boulevard, and Imperial Highway east of the project site.

The Glenn M Anderson Freeway/Century Freeway (Interstate 105) is approximately 2.5 miles southeast of the project site. This east-west freeway begins at Imperial Highway near LAX and ends approximately 17 miles to the east at the San Gabriel River Freeway (I-605). The Glenn M. Anderson Freeway generally has four lanes and an HOV lane per direction. It interchanges with the San Diego Freeway, and has full or partial ramp connections at Imperial Highway, Sepulveda Boulevard, Nash Street, and Atwood Way south of the project site.

The Marina Freeway/Expressway (State Route 90) follows an east-west alignment of relatively short length (currently 1.8 miles as freeway and 1.5 miles as expressway). The freeway portion, between Culver Boulevard on the west and the Slauson Avenue terminus on the east, primarily provides two to three lanes in each direction, with additional lanes available at its interchange with the San Diego Freeway. The expressway portion has two lanes per direction between Lincoln Boulevard and Culver Boulevard. The Marina Freeway has full ramp connections at Culver Boulevard and Centinela Avenue.

Streets and Highways

Pershing Drive, a dedicated Major Highway Class II near the coastline, has two traffic lanes per direction and left-turn channelization between Manchester Avenue and Westchester Parkway. North of Manchester Avenue, Pershing Drive maintains one lane per direction. Pershing Drive serves single- and multi-family residential uses, plus some commercial uses in the Playa del Rey community.

Rayford Drive, a dedicated local street, forms the western boundary of the project site. Rayford Drive provides one traffic lane per direction and primarily serves single-family residential uses, plus some multi-family residential, commercial, and religious uses near Manchester Avenue.

Lincoln Boulevard (State Route 1), a dedicated Major Highway Class I in the project area, is the primary north-south arterial in the coastal area between the City of Santa Monica and the Westchester community. It provides access to a wide variety of uses, including LAX (via Sepulveda Boulevard). Currently, Lincoln Boulevard has three traffic lanes in each direction, plus left-turn channelization in the study area. In the future, Lincoln Boulevard will be improved by adding one northbound through lane.

Loyola Boulevard is a dedicated Secondary Highway north of Manchester Avenue where it provides one traffic lane in each direction and accesses Loyola Marymount University (LMU), single- and multi-family residential uses, commercial uses, and the Westchester Municipal Facility. Also in the project vicinity, Loyola Boulevard extends as a Collector Street between Lincoln Boulevard and Westchester Parkway. This segment has up to three traffic lanes, depending on the location and approach, and generally serves commercial and single- and multi-family residential uses.

83rd Street is a dedicated Collector Street serving the single-family residential communities in the Westchester-Playa del Rey area. Adjacent to Lincoln Boulevard, 83rd Street also serves local commercial uses, providing one traffic lane per direction and left-turn channelization at its intersection with Lincoln Boulevard.

Manchester Avenue, the northern project boundary and a dedicated Secondary Highway between Vista Del Mar Lane and Pershing Drive, and a dedicated Major Highway Class II east of Pershing Drive, extends through the Westchester-Playa del Rey communities and into the City of Inglewood. Generally, Manchester Avenue provides three traffic lanes per direction, plus left-turn channelization in the Westchester-Playa del Rey area. It also has a bike lane in each direction from Lincoln Boulevard heading easterly. Manchester Avenue accesses commercial, residential, recreational, and public uses, and has ramp connections to the San Diego Freeway.

Public Transportation

Several bus routes traverse the Westchester, Playa del Rey, Marina del Rey, and LAX areas. The two public transit operators providing service to the immediate project vicinity are the Los Angeles County Metropolitan Transportation Authority (Metro) and the Santa Monica Big Blue Bus Lines (BBB). The bus routes directly serving the project site are described below:

Metro Bus Service:

Metro Line 115/315 provides daily service between Playa del Rey and the City of Norwalk, generally traveling along Manchester Avenue and Firestone Boulevard. This line passes by the project site on Manchester Avenue and has an eastbound and a westbound bus stop just east of Lincoln Boulevard. Bus headways in the project site vicinity are approximately 15 minutes during the weekday peak-hours. Frequent service is also available on weekends and holidays to serve the beach-going public.

Big Blue Bus Service:

Line 3 runs on a daily basis between UCLA and the MTA Green Line Station at Aviation Boulevard and Imperial Highway. It travels primarily along Lincoln Boulevard with portions traveling along

Wilshire Boulevard, Montana Avenue, 4th Street, Manchester Avenue, Sepulveda Boulevard, 96th Street (including a stop at the LAX Transit Center), Airport Boulevard, and Aviation Boulevard. It utilizes the same bus stop adjacent to the project site as MTA Line 115. Line 3 has headways of approximately 15 minutes throughout most of the day Monday through Friday, 30 minutes throughout most of Saturday, and 30 minutes throughout most of Sunday.

Line R3, the Lincoln Boulevard Rapid line, is a part of the City of Santa Monica "Rapid Blue" Program. Line R3 travels from Wilshire Boulevard and 4th Street in the City of Santa Monica to the Metro Green Line Aviation Station near LAX. Line R3 travels along the densely populated ten-mile stretch of Lincoln Boulevard and has a stop on Lincoln Boulevard and Manchester Avenue. Headways are approximately 15 minutes during the weekday peak-hour. No service is provided on Saturdays, Sundays, or holidays.

In addition to these three lines, many more transit opportunities are available via transfers to other lines or transit providers. When these transfer opportunities are considered, all areas within the Los Angeles region are accessible using public transit. Thus, some of the persons going to and from the project site could choose to utilize public transit. However, for a conservative analysis, none of the future project trips have been assigned to public transit.

Analysis of Existing Traffic Conditions

Study Intersections

An analysis of existing weekday AM and PM peak-hour traffic conditions was performed at the following seven study intersections, which were determined in consultation with the City of Los Angeles Department of Transportation (LADOT). Except as noted, these are all signalized intersections:

1. 83rd Street and Lincoln Boulevard[1]
2. 83rd Street and Rayford Drive[2]
3. Manchester Avenue and Pershing Drive
4. Manchester Avenue and Rayford Drive
5. Manchester Avenue and Lincoln Boulevard[1]
6. Manchester Avenue and Loyola Boulevard
7. Loyola Boulevard and Lincoln Boulevard[1]

Due to the concern of cut through traffic in the communities south of the project site, access to the project site is not allowed from the south through these communities. Therefore, little (if any) project traffic

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[1] *Due to on-going construction, analyzed as a 4-way STOP controlled intersection for existing conditions.*

[2] *4-way STOP Controlled.*

would travel along these residential streets and no analysis of additional intersections in these communities is necessary.

Street Segment

In addition, a residential street impact analysis was conducted on the following street segment, which was determined in consultation with LADOT.

1. Rayford Drive, south of 85th Street.

The locations of the seven study intersections and the residential street segment are shown in Figure IV.K-1, Study Intersections and Street Segment.

Existing (2008) Traffic Volumes

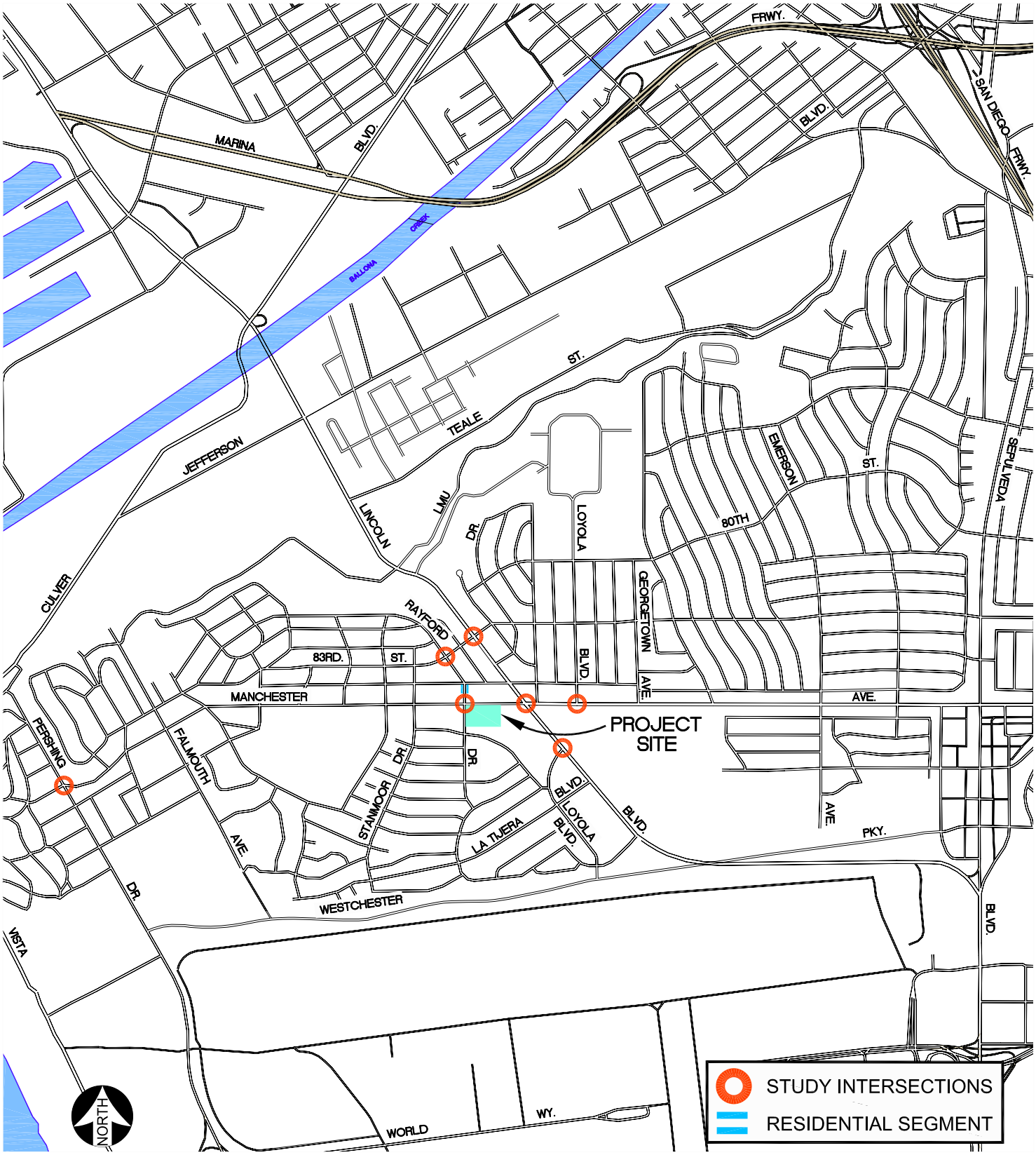
Traffic volumes for the existing conditions at the seven study intersections were obtained from manual traffic counts conducted in March and April of 2008 when schools were in regular session. In accordance with LADOT Traffic Study Policies and Procedures, the traffic counts conducted for this study cover the weekday morning and afternoon peak commute periods.

Peak-hour volumes were determined individually for each intersection based on the combined four highest consecutive 15-minute volumes for all vehicular movements at the intersection. Figures IV.K-2, Existing (2008) Traffic Volumes AM Peak Hour, and IV.K-3, Existing (2008) Traffic Volumes PM Peak Hour, show existing weekday AM and PM peak hour traffic volumes at the study intersections.

Existing (2008) Traffic Conditions

The methodology used for the analysis and evaluation of traffic operations at each study intersection is based on procedures outlined in the Transportation Research Board Circular 212,[3] Interim Materials on Highway Capacity. In the discussion of the Critical Movement Analysis (CMA) for signalized intersections, procedures were developed for determining operating characteristics of an intersection in terms of the "Level of Service" (LOS) provided for different levels of traffic volume and other variables, such as the number of traffic signal phases. LOS describes the quality of traffic flow. LOS A to C denote conditions in which traffic operations are proceeding quite well, with no interruptions in traffic flow due to traffic volumes. Level D, a more constrained condition, is the level for which a metropolitan area street system is typically designed. Level E represents volumes at or near roadway capacity, which will result in possible stoppages of momentary duration and occasional unstable flow. Level F is a forced-flow condition, occurring when a facility is overloaded and vehicles experience stop-and-go traffic with delays of long duration.

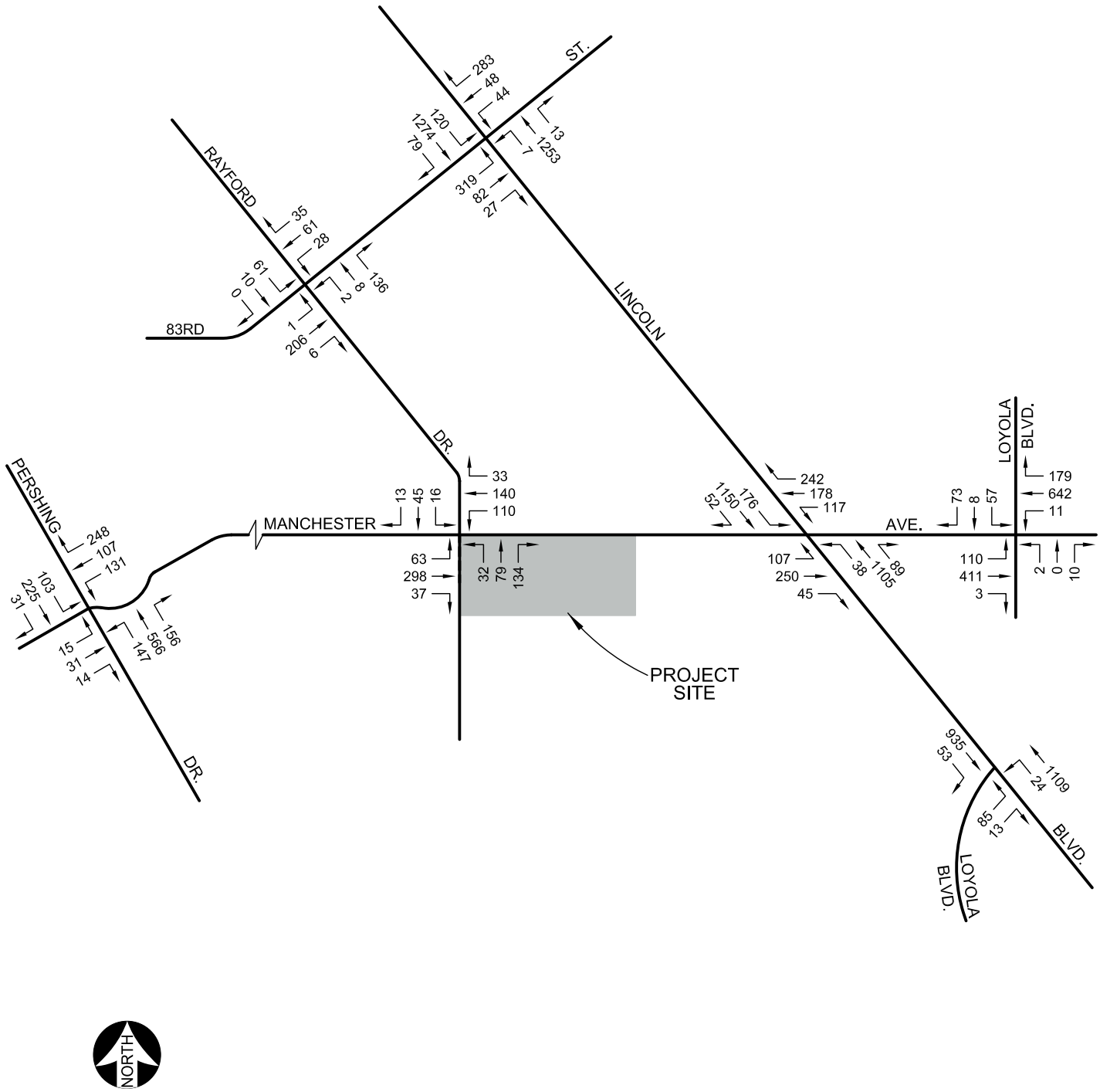
[3] *Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980.*



Source: Crain & Associates, June 23, 2008.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.K-1
Study Intersections and Street Segments



Source: Crain & Associates, June 23, 2008.

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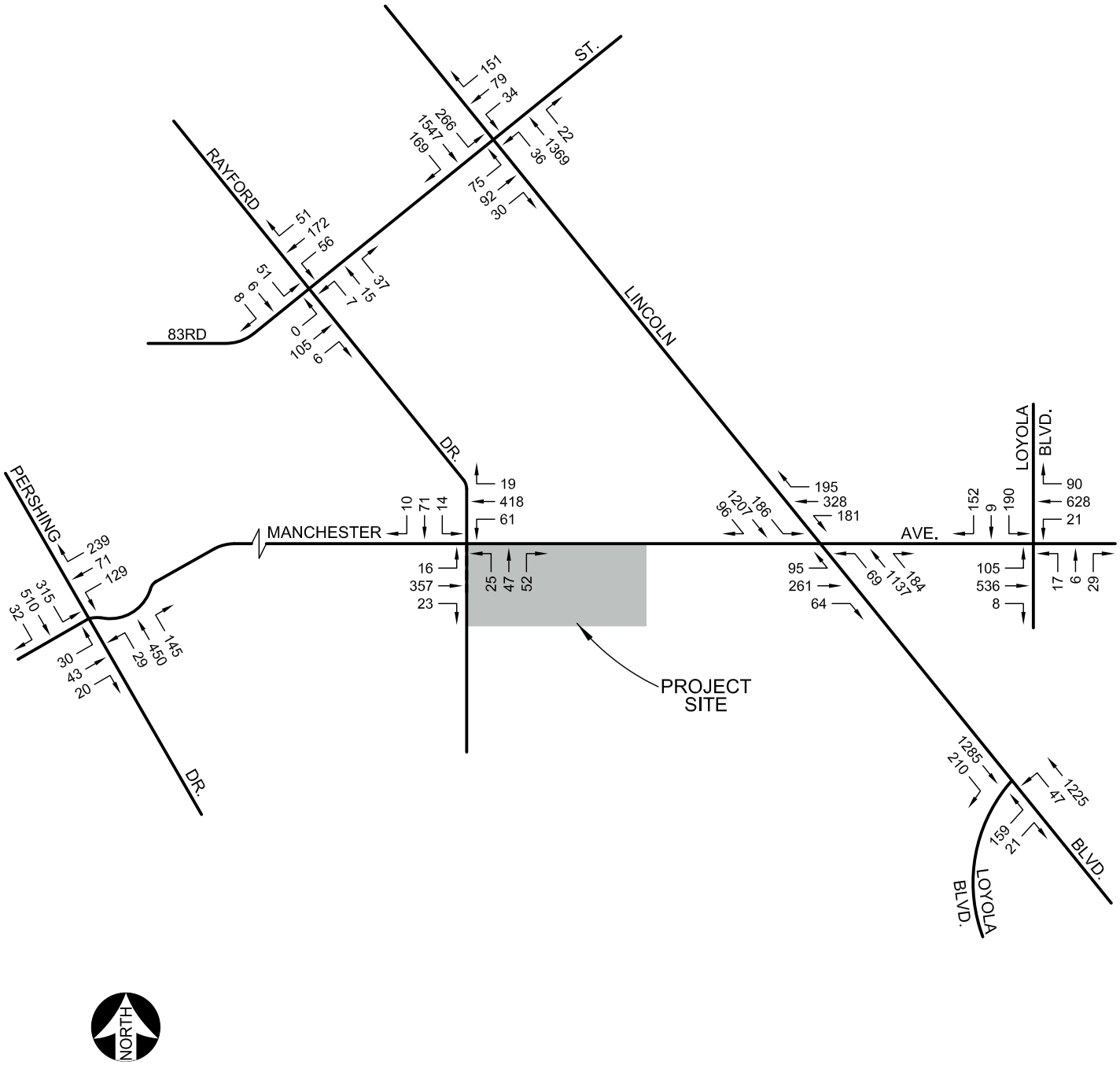
Environmental Planning and Research

Figure IV.K-2
Existing (2008) Traffic Volumes
AM Peak Hour



Source: Crain & Associates, June 23, 2008.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.K-3
Existing (2008) Traffic Volumes
PM Peak Hour

A determination of the LOS at an intersection, where traffic volumes are known or have been projected, can be obtained through summation of the critical movement volumes at that intersection. Once the sum of critical movement volumes has been obtained, the values indicated in Table IV.K-2, Critical Movement Volume Ranges for Determining Levels of Service Maximum Sum of Critical Volumes (VPH), below can be used to determine the applicable LOS.

Table IV.K-2
Critical Movement Volume Ranges[a] for Determining Levels of Service
Maximum Sum of Critical Volumes (VPH)

Level of Service	Two Phases	Three Phases	Four or More Phases	4-Way STOP Sign Controlled
A	900	855	825	600
B	1,050	1,000	965	700
C	1,200	1,140	1,100	800
D	1,350	1,275	1,225	900
E	1,500	1,425	1,375	1,000
F	----------Not Applicable----------			

[a] *For planning applications only, i.e., not appropriate for operations and design applications. Also, a computerized traffic signal coordination system, such as Automated Traffic Surveillance and Control (ATSAC), increases these values by approximately seven percent. With the addition of a further upgrade, such as Adaptive Traffic Control System (ATCS), an additional three percent increase in these values occurs.*

Source: Crain & Associates, January 2009.

Capacity is defined to represent the maximum total hourly movement volume which has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. For planning purposes, capacity equates to the maximum value of LOS E, as indicated in Table IV.K-3, Level of Service as a Function of CMA Values. The CMA indices used in this study were calculated by dividing the sum of critical movement volumes by the appropriate capacity value for the type of signal control present or proposed at the study intersections. The Level of Service corresponding to a range of CMA values is shown in Table IV.K-3, Level of Service as a Function of CMA Values.

Table IV.K-3
Level of Service as a Function of CMA Values

Level of Service	Description of Operating Characteristics	Range of CMA Values
A	Uncongested operations; all vehicles clear in a single cycle.	< 0.60
B	Same as above	>0.60 - <0.70
C	Light congestion; occasional backups on critical approaches.	>0.70 - <0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	>0.80 - <0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	>0.90 - <1.00
F	Forced flow with stoppages of long duration.	>1.00

Source: Crain & Associates, January 2009.

By applying this analysis procedure to the study intersections, the CMA values and the corresponding LOS for existing traffic conditions were determined. As requested by LADOT, to be conservative and reflect the on-going construction activity, the intersections along Lincoln Boulevard utilized the capacity of a 4-way STOP sign controlled intersection. For analysis purposes consistent with the CMA methodology, the 4-Way STOP sign controlled intersection of 83rd Street/Rayford Drive was assumed to be signalized, but with a lower capacity of 1,000. A reduced capacity of 1,000 vehicles per hour (VPH) was used to analyze the three Lincoln Boulevard intersections (with 83rd Street, Manchester Avenue, and Loyola Boulevard) where on-going construction has reduced the intersections' capacity. This is a very conservative assumption which reflects the heaviest levels of construction activity.[4]

The "Existing" condition results of the CMA for the study intersections are included in Table IV.K-4, Critical Movement Analysis Summary Existing (2008) Traffic Conditions. These results show that five of the study intersections are within good Levels of Service, ranging from LOS A to C, during both peak hours and two of the Lincoln Boulevard intersections currently under construction operate at LOS F during both peak hours.

Table IV.K-4
Critical Movement Analysis Summary Existing (2008) Traffic Conditions

No.	Intersection	AM Peak Hour		PM Peak Hour	
		CMA	LOS	CMA	LOS
1	83rd Street and Lincoln Boulevard	1.348	F	1.176	F
2	83rd Street and Rayford Drive	0.448	A	0.389	A
3	Manchester Avenue and Pershing Drive	0.318	A	0.374	A
4	Manchester Avenue and Rayford Drive	0.287	A	0.207	A
5	Manchester Avenue and Lincoln Boulevard	1.140	F	1.260	F
6	Manchester Avenue and Loyola Boulevard	0.314	A	0.377	A
7	Loyola Boulevard and Lincoln Boulevard	0.539	A	0.776	C

Source: Crain and Associates, January 2009.

[4] *LADOT requested that a 4-way stop capacity (1,000 VPH) be assumed for existing conditions along Lincoln Boulevard. This assumption was only applied to existing conditions due to the current construction activities. For "Future Without Project" and "Future With Project" conditions, normal signal operations were assumed for these intersections. The existing LOS calculations only reflect current conditions, which are not used to calculate impacts. Therefore, significant impacts calculations for both project-related and cumulative impacts were not affected by the assumption of a 4-way stop for existing conditions.*

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines*, the Proposed Project would have a significant impact on traffic, transportation, and parking if it would cause any of the following conditions to occur:

(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 capacity ratio 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 due 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; or

(g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following factors:

Intersection Impacts

(a) A proposed project would normally have a significant impact on intersection capacity if the project traffic causes an increase in the V/C ratio on the intersection operating condition after the addition of the project traffic of one of the following:

- V/C ratio increase ≥ 0.040 if the Final LOS* is C
- V/C ratio increase ≥ 0.020 if the Final LOS* is D
- V/C ratio increase ≥ 0.010 if Final LOS* is E or F

* "Final LOS" is defined as projected future conditions including project, ambient, and related project growth but without project traffic mitigation.

No significant impacts are deemed to occur if the final LOS is A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic flows. These stepped criteria are summarized in Table IV.K-5, LADOT Criteria for Significant Traffic Impact, below.

Table IV.K-5
LADOT Criteria for Significant Traffic Impact

LOS	Final V/C Ratio	Project-Related Increase in V/C
C	>0.700 - 0.800	Equal to or greater than 0.040
D	> 0.800 - 0.900	Equal to or greater than 0.020
E, F	> 0.900	Equal to or greater than 0.010
Source: Crain and Associates, January 2009.		

Residential Street Impacts

Neighborhood residential street impacts are evaluated by LADOT based on the average daily traffic (ADT) along the street segment analyzed. For this calculation, "With Project" is defined as the future study year projected ADT, including ambient and related project traffic growth plus project traffic. Incremental project-related increases in the daily traffic of a residential street are determined to be significant based upon the following LADOT criteria summarized in Table IV.K-6, LADOT Neighborhood Traffic Impact Criteria.

Table IV.K-6
LADOT Neighborhood Traffic Impact Criteria

Projected Future ADT (With Project)	Project-Related Increase in ADT
0 to 999	16 percent or more of final ADT
1,000 or more	12 percent or more of final ADT
2,000 or more	10 percent or more of final ADT
3,000 or more	8 percent or more of final ADT
Source: LADOT Traffic Study Policies and Procedures, Revised May 2001.	

Project Impacts

Trip Generation

The vehicular trip generation of City of Los Angeles projects in the study area is analyzed according to two methodologies. These methodologies and the associated trip generation rates are contained or referenced in the Coastal Transportation Corridor Specific Plan (CTCSP) and the LADOT Traffic Study Policies and Procedures manual, and are described below.

1. Coastal Transportation Corridor Specific Plan (CTCSP)

   Pursuant to the CTCSP, LADOT requires a traffic assessment or analysis of projects in much of the coastal area of the City, including the Venice, Mar Vista, Del Rey, Playa del Rey, Westchester, and LAX areas. The CTCSP sets forth the required methodology for the analysis of PM peak-hour trips. The CTCSP trip rates used in this analysis were approved by LADOT (see Table IV.K-7, Project Trip Generation Formulas and Rates).

2. Standard LADOT Methodology – Traffic Study Policies and Procedures Manual

   The standard LADOT methodology requires that traffic impacts be analyzed according to its Traffic Study Policies and Procedures Manual. This standard LADOT methodology requires the use of the most current Trip Generation handbook (7th Edition), published by the Institute of Transportation Engineers (ITE), unless the project is within a Transportation Specific Plan area. If such is the case, then the trip generation formulas and rates are to be applied according to the Specific Plan procedures. If necessary, other trip generation formulas or rates may also be permitted pursuant to LADOT approval.

As noted previously, the Proposed Project is within the CTCSP area. As the CTCSP contains only PM peak-hour trip rates, those rates were used to calculate the Proposed Project's PM peak-hour trips. The AM peak-hour and daily project trip generations were calculated from ITE formulas and rates in accordance with the standard LADOT methodology. These formulas and rates were approved by LADOT (see Table IV.K-7, Project Trip Generation Formulas and Rates).

Table IV.K-7
Project Trip Generation Formulas and Rates

Project Uses	
Apartment (per dwelling unit) - LU 220	
Daily	T = 6.01 (D) + 150.35
AM Peak Hour	T = 0.49 (D) + 3.73; I/B = 20%; O/B = 80%
PM Peak Hour*	T = 0.70 (D); I/B = 65%; O/B = 35%
Existing Uses Being Removed	
Specialty Retail (per 1,000 sf) - LU 814	
Daily	T = 44.32 (A)
AM Peak Hour**	T = 1.20 (A); I/B = 60%; O/B = 40%
PM Peak Hour*	T = 5.00 (A); I/B = 44%; O/B = 56%
Where: T = trip ends I/B = inbound O/B = outbound	 A = building area in 1,000's of square feet D = dwelling unit
Source: *Trip Generation, 6th Edition, Institute of Transportation Engineers, 1997.* ** Coastal Transportation Corridor Specific Plan.* *** San Diego Traffic Generators, San Diego Association of Governments, 1998.*	

Applying these sets of trip generation formulas and rates to the new uses and the existing uses being removed, the project trip generation for the AM peak-hour, PM peak-hour, and daily periods were calculated. Trip counts were taken between March 18 and March 20, 2008. As shown in Table IV.K-8, Project Trip Generation, the Proposed Project would result in a net decrease of 307 daily trips, with an increase of 33 trips during the AM peak hour and a decrease of 32 trips during the PM peak hour.

Table IV.K-8
Project Trip Generation

Land Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Existing Site Trips								
Specialty Retail	24,000 sf	1,064	17	12	29	53	67	120
Proposed Project Trips								
Apartments/Joint Live/Work Units	260 du	1,713	26	105	131	118	64	182
Previously-Approved Apartments	(134) du	(956)	(14)	(55)	(69)	(61)	(33)	(94)
Total Area Intersection Trips		**(307)**	**(5)**	**38**	**33**	**4**	**(36)**	**(32)**

Source: Crain & Associates, February 2009 (see Appendix L, Alternatives Traffic Analysis, to this Draft EIR).

Trip Distribution

Project-generated traffic was assigned to the street system based on a trip distribution pattern, agreed upon by Crain & Associates and LADOT. This trip distribution pattern was determined by considering the proposed land uses; existing traffic movements; characteristics of the surrounding street system; nearby regional employment centers; and the geographic location of the project site and its proximity to freeways and major travel routes. Considering these factors, the regional trip distributions shown in Table IV.K-9, Project Directional Trip Distribution, were estimated for the project.

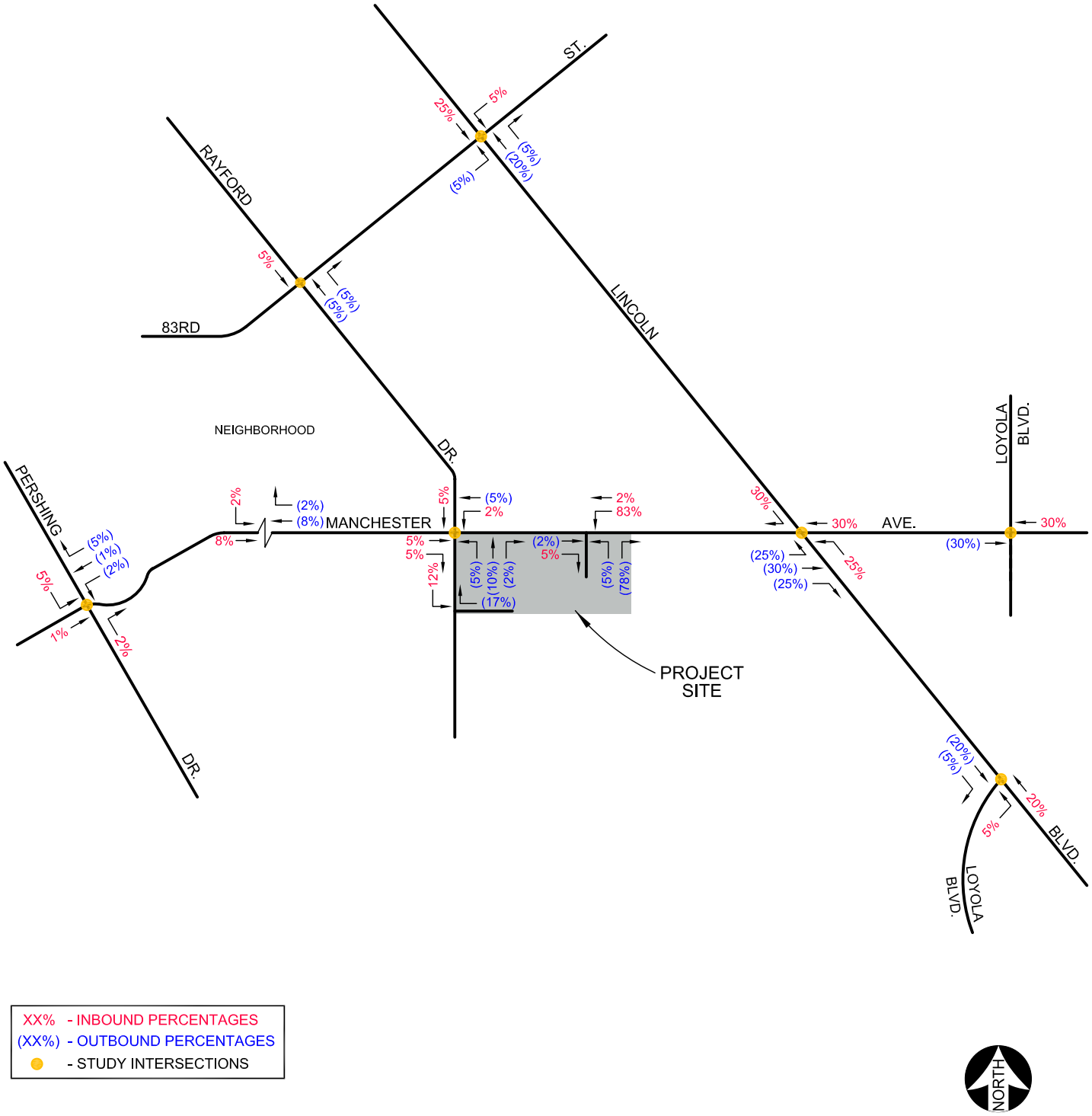
Table IV.K-9
Project Directional Trip Distribution

	North	South	East	West
Proposed Project	30%	25%	35%	10%

Source: Crain & Associates, January 2009.

Trip Assignment

The directional distribution percentages, shown in Table IV.K-9, Project Directional Trip Distribution, above, were then disaggregated and assigned to specific routes and intersections within the study area that are expected to be used to access the project site. These project trip assignment percentages are presented in Figure IV.K-4, Project Trip Assignment Percentages.



Source: Crain & Associates, June 23, 2008.

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Figure IV.K-4
Project Trip Assignment Percentages

Applying these inbound and outbound percentages to the project trip generation previously calculated in Table IV.K-6, LADOT Neighborhood Traffic Impact Criteria, net project traffic volumes at the seven study intersections were determined for the AM and PM peak hours, as shown in Figures IV.K-5, Net Project Traffic Volumes AM Peak Hour**,** and IV.K-6, Net Project Traffic Volumes PM Peak Hour, respectively.

Vehicular Access

Vehicular access, which would be shared with the adjacent Playa del Oro development, would be provided via one main driveway on Manchester Avenue and one service driveway on an alley way located south of the project site, which directly connects to Rayford Drive. Appropriate signs would be posted at the intersection of the alley and Rayford Drive to prohibit project-generated and other traffic from using the alley to travel through the community south of the project site. Specifically, a "No left-turn" sign for westbound traffic will be installed along the alley at Rayford Drive and a "No right-turn" sign for northbound traffic will be installed along Rayford Drive at the alley to prohibit cut-through traffic. Ingress and egress to the subterranean parking structure would occur on the eastern and southern sides of the proposed development.

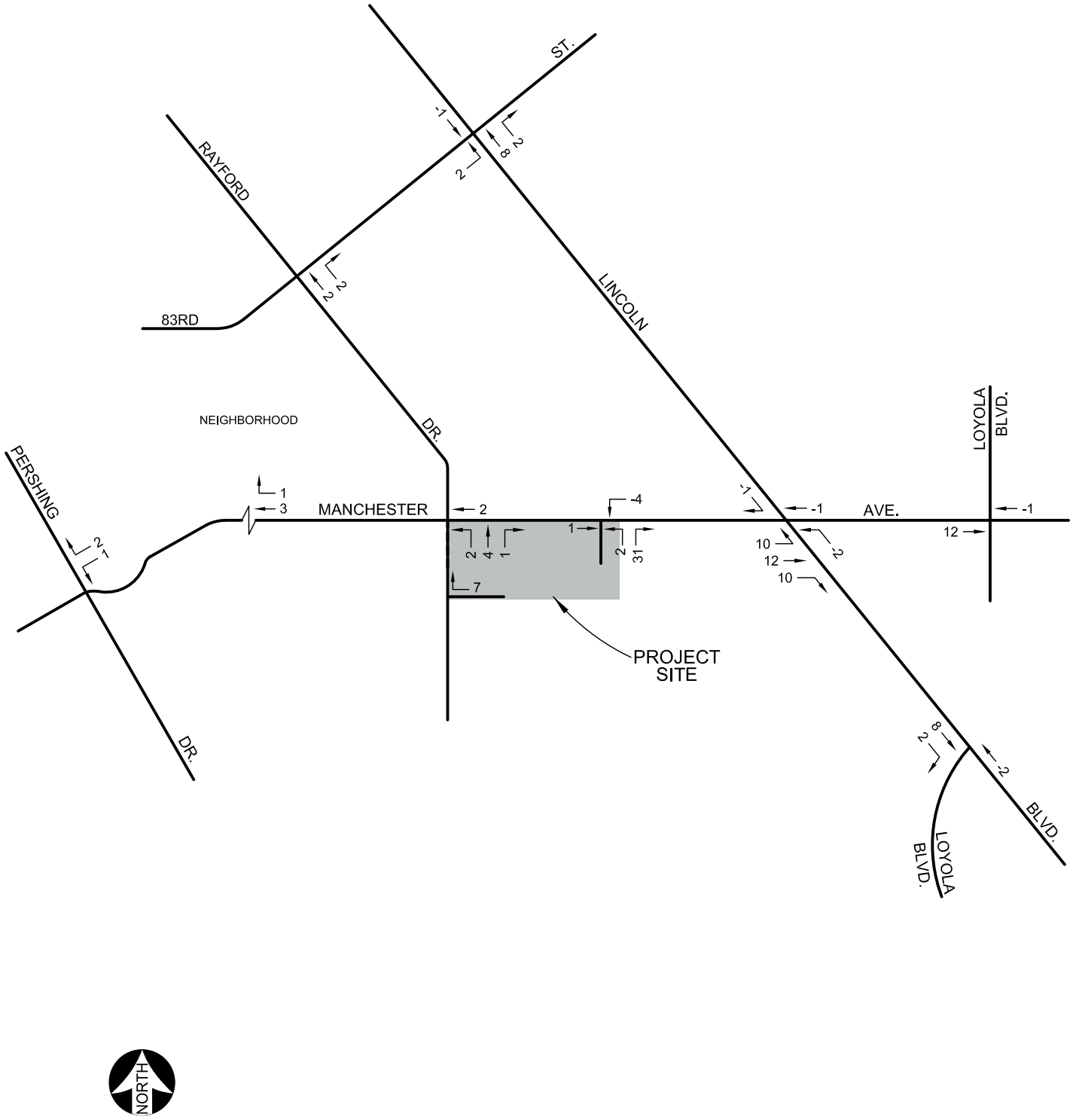
Future (2012) Traffic Conditions

A number of projects are either planned for development or under construction in the project area that could contribute to traffic volumes within the study time frame. Thus, an analysis of the future traffic has been expanded to include traffic that may be generated by yet undeveloped or unoccupied projects. In order to evaluate future traffic conditions in the project area, an analysis of the existing (2008) traffic volumes was first conducted. For the analysis of future conditions for the study year of 2012, an ambient growth factor of 2.0 percent per year, compounded annually, was applied to the existing volumes at four of the seven study intersections. For the remaining three intersections, located on Lincoln Boulevard, construction completion and a 30 percent increase in traffic along and turning onto Lincoln Boulevard was assumed for the 2012 baseline condition, per LADOT. The two percent annual ambient growth factor was applied as an alternative at these three intersections only to traffic crossing Lincoln Boulevard.

The result provides the "baseline" traffic volumes for the analysis of future (2012) conditions. Although the inclusion of the annual growth factor generally accounts for area-wide traffic increases, for the purposes of providing a conservative analysis of the potential cumulative effects, the traffic generated by related projects in the study area was also added to the future baseline traffic volumes. The total future volumes, including related projects, provide the basis for the "Without Project" condition. Finally, project traffic was analyzed as an incremental addition to the Future (2012) "Without Project" condition to determine the Future (2012) "With Project" condition.

Related Projects

Also included in the future year analysis are area projects proposed or under construction, referred to as "related projects." Information regarding potential related projects within an approximate two-mile radius of the project site was obtained from LADOT and the County of Los Angeles, as well as from recent traffic studies performed in the vicinity.



Source: Crain & Associates, August, 2008.

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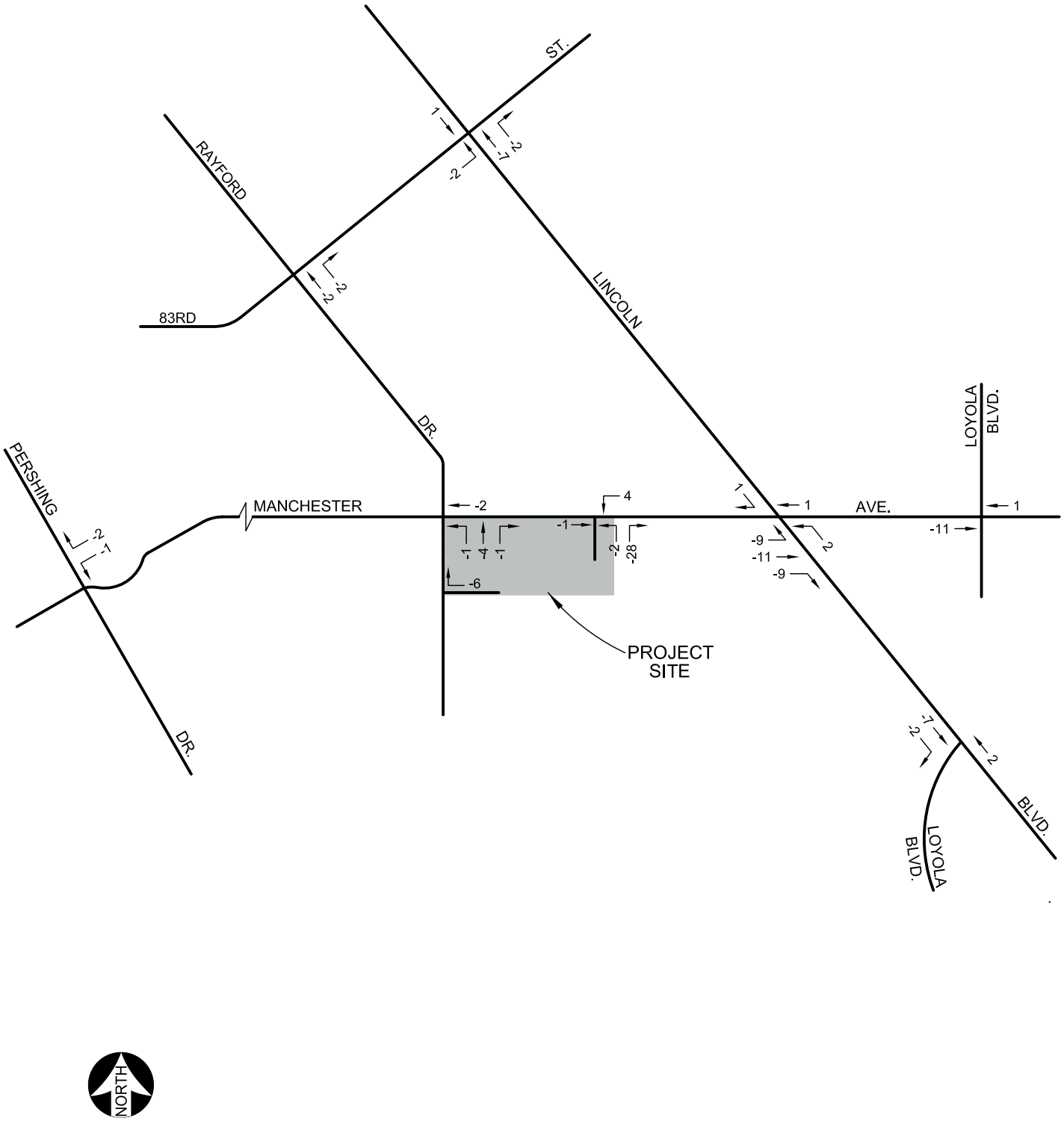
Figure IV.K-5
Net Project Traffic Volumes
AM Peak Hour



Source: Crain & Associates, August, 2008.

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Figure IV.K-6
Net Project Traffic Volumes
PM Peak Hour

It was determined that 19 related projects in the surrounding communities and jurisdictions could potentially contribute significant traffic to the study intersections. A summary description of these related projects are provided in Table IV.K-10, Related Projects Location, Description, and Trip Generation. Locations of these projects are provided in Figure IV.K-7, Related Projects Location Map.

The trips generated by these related projects were estimated from previous traffic studies, when available, or by using the trip generation formulas and rates discussed above. The estimated trip generations of the related projects are also included in Table IV.K-10, Related Projects Location, Description, and Trip Generation. These trips were distributed and assigned using similar assumptions and rationale applied to the Proposed Project. For purposes of a conservative analysis, it was assumed that all of these related projects would be completed by 2012.

To determine the 2012 Without Project traffic volumes, the related projects traffic was combined with the existing traffic volumes that were increased by either 2.0 percent per year or 30 percent (as described above). The resulting 2012 Without Project intersection peak-hour volumes are shown in Figures IV.K-8, Future (2012) Without Project Traffic Volumes AM Peak Hour**,** and IV.K-9, Future (2012) Without Project Traffic Volumes PM Peak Hour. These are the "benchmark" values used in analyzing project traffic impacts on the street system. They represent a conservative condition due to several factors, such as: 1) some projects may implement traffic reduction programs; 2) transit usage may increase; 3) the effects of internal trip linkages and pass-by/diverted trips have not been credited for all projects; and 4) some projects will likely be developed less than described or outside the study time frame. Thus, actual future traffic volumes in the study area could be less than what was analyzed.

Highway System Improvements

LADOT has recommended that several study intersections be revised for the future year analyses to reflect roadway improvements being implemented by others. These improvements are described below.

Caltrans

Caltrans is implementing a lengthy improvement on Lincoln Boulevard (SR-1) from Marina del Rey to La Tijera Boulevard. This improvement incorporates, and where feasible expands upon, the Playa Vista Phase I mitigation plan for Lincoln Boulevard. In the Proposed Project vicinity, Lincoln Boulevard is being widened and realigned from La Tijera Boulevard to LMU Drive to provide an additional northbound lane along with traffic signal modifications.

Analysis of Future Traffic Conditions – Without and With Project

The future traffic volumes were developed as follows:

- As described earlier, future benchmark traffic volumes for the 2012 Without Project conditions were determined by combining area traffic growth with new traffic generated by the related projects.

Table IV.K-10
Related Projects Location, Description, and Trip Generation

Map No.	Location (Address)	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
1.	SW Corner of Lincoln Boulevard/Manchester Avenue	Playa del Oro/Furama Redevelopment								
		539 du	Apartment	(204)	(155)	112	(43)	106	(14)	92
		27,000 sf	Retail							
		(500) rm	*Hotel (to be removed)*							
		(10,420) sf	*Retail (to be removed)*							
		(10,590) sf	*Office (to be removed)*							
		(4,800) sf	*High-Turnover Restaurant (to be removed)*							
2.	7215 W. Manchester Avenue[a]	4,850 sf	Walk-In Bank	607	8	8	16	33	32	65
3.	6225 W. Century Boulevard	180 du	Hotel	1,471	59	42	101	62	64	126
4.	7900 S. Loyola Boulevard	16 st	Daycare Center	72	7	6	13	6	7	13
5.	7831 Sepulveda Boulevard	600 st	School Expansion	774	139	113	252	76	92	168
6.	5401 Beethoven Street	420 st	Private School	3,171	208	170	378	120	136	256
7.	8632 Sepulveda Boulevard	3,621 sf	Walk-In Bank	567	8	7	15	30	30	60
8.	5550 Grosvenor Boulevard	208 du	Condominium	1,219	16	76	92	98	48	146
9.	4500 Via Marina	120 du	Apartment (expansion)	806	12	49	61	25	14	39
10.	Southern terminus of Fiji Way (Parcel 64)[b]	478 du	Multi-Family Residential	1,106	17	76	93	58	30	88
		500 sf	Restaurant							
		34 slip	Boat							
		(224) du	*Apartment (to be removed)*							
11.	West of Fiji Way near terminus Fisherman's Village[c] (Parcels 55/56/W)	132 rm	Hotel	2,375	41	57	98	114	95	209
		1,230 seat	Restaurant							
		24,250 sf	Retail							
		5,200 sf	Office							
		26 slip	Boat							
		(12,984) sf	*Retail/Commercial (to be removed)*							
		(16,149) sf	*Restaurant (to be removed)*							
		(17) slip	*Boat (to be removed)*							

Table IV.K-10 (Continued)
Related Projects Location, Description, and Trip Generation

Map No.	Location (Address)	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
12.	West of Lincoln Boulevard, North of Fiji Way (Parcels 50 & 83)	4,700 sf	Specialty Retail	208	4	2	6	9	12	21
13.	12700 Braddock Drive	134,557 sf	Warehouse	667	50	11	61	54	161	215
		1,357 sf	Office	15	2	0	2	1	3	4
		(58,323) sf	*University of CA Laundry Building (to be removed)*	*(223)*	*(33)*	*(10)*	*(43)*	*(17)*	*(30)*	*(47)*
14.	South of Jefferson Boulevard, East of Lincoln Boulevard	Playa Vista Phase I								
		3,246 du	Condominium	34,014	3,437	687	4,124	681	2,827	3,508
		2,142,050 sf	Office							
		25,000 sf	Retail							
		1,129,900 sf	Production & Staging Support							
		65,000 sf	Community Serving Uses							
		Playa Vista Phase I – Completed and Occupied								
		(2,166) du	Condominium							
		(221,000) sf	Office							
		(12,500) sf	Retail							
15.	South of Jefferson Boulevard/Westlawn Avenue[d]	Playa Vista Phase II								
		175,000 sf	Office	24,220	577	1,049	1,626	1,275	1,027	2,302
		2,600 du	Apartment							
		150,000 sf	Shopping Center							
		40,000 sf	Community Serving Uses							
16.	North of Fiji Way, West of Admiralty Way (Parcel 52/GG)	345 Vessel	Dry Stack Storage Facility	995	15	28	43	17	30	47
		30 Vessel	Mast Up Storage Space	86	1	3	4	1	3	4
		1,500 sf	Sheriff Boatwright Facility	-	-	-	-	-	-	-
17.	1 LMU Drive[e]	7,800 st	Loyola Marymount University Master Plan	0	0	0	0	0	0	0

Table IV.K-10 (Continued)
Related Projects Location, Description, and Trip Generation

Map No.	Location (Address)	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
18.	6161 W. Centinela Avenue[f]	Carlyle Radisson								
		342,409 sf	Office	3,442	442	60	502	79	383	462
19.	9204 Airport Boulevard[g]	Airport Boulevard Carwash								
		1 site	Car Wash	536	10	10	20	37	37	74
		(15,251) sf	*Car Rental Facility (to be removed)*							

Note: Numbers in parentheses are negative numbers.
Numbers that are italicized and in parentheses are items to be removed.

[a] *Traffic Impact Study for Bank of America Project at Lincoln Boulevard/Manchester Avenue, Crain & Associates, June 2008.*
[b] *Traffic Analysis for a Proposed 478-unit Residential Development on Parcel 64 in Marina del Rey, Crain & Associates, January 2007.*
[c] *Traffic Study for the Fisherman's Village Retail and Commercial Development Project, Hirsch Green Traffic Consultant, March 2007.*
[d] *Traffic Analysis for The Village as Playa Vista Project, Kaku Associates, Inc. and Raju Associates, Inc., July 2003.*
[e] *No net increase of number of students or expansion of campus square footage. Therefore, no net increase trip generation for the project.*
[f] *Traffic Impact Study Report for Proposed Entrada Office Project at 6161 W. Centinela Avenue, Culver City, Crain & Associates, November 16, 2007.*
[g] *Memorandum of Understanding (MOU) for the 9204 Airport Boulevard Carwash Project, Crain & Associates, March 19, 2008.*

Source: Crain & Associates, January 2009.

Source: Crain & Associates, August 12, 2008.

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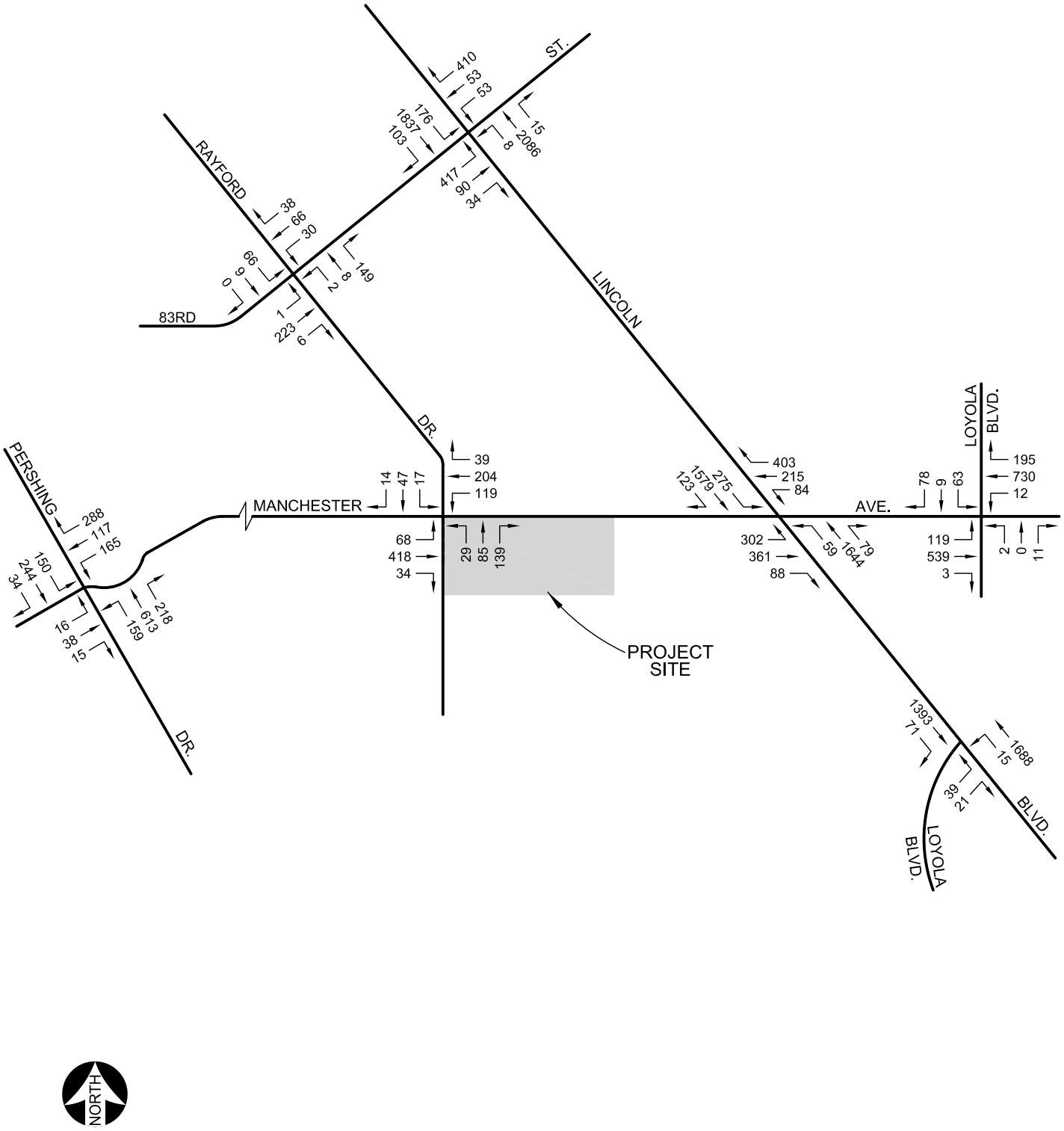
Figure IV.K-7
Related Projects Location Map



Source: Crain & Associates, January 21, 2009.

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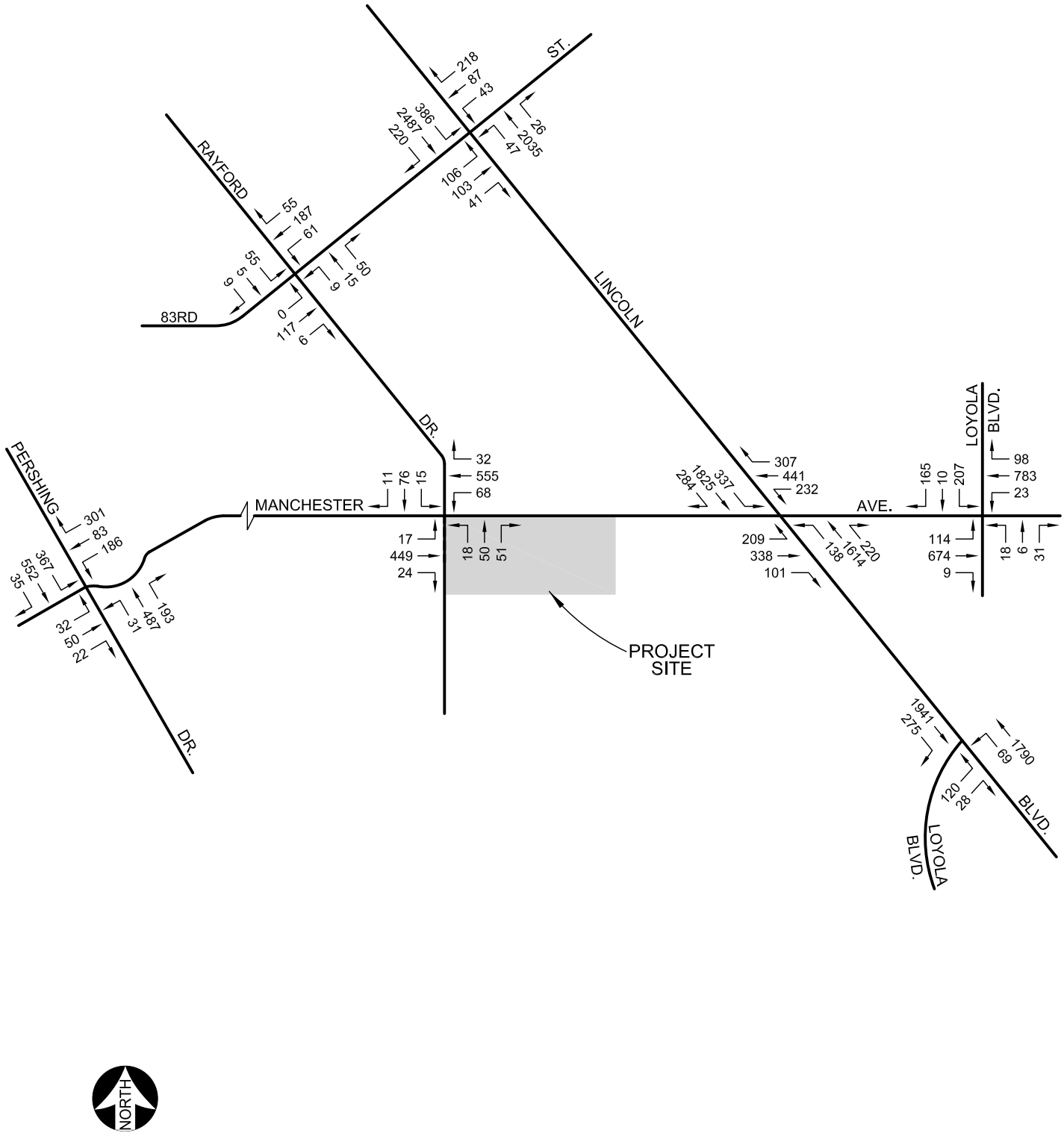
Figure IV.K-8
Future (2012) Without
Project Traffic Volumes AM Peak Hour



Source: Crain & Associates, January 21, 2009.

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Figure IV.K-9
Future (2012) Without
Project Traffic Volumes PM Peak Hour

Traffic volumes generated by the Proposed Project were then combined with the appropriate benchmark volumes to develop the 2012 With Project traffic volumes. These were analyzed to determine the traffic impacts directly attributable to the Proposed Project. Figure IV.K-10, Future (2012) With Project Traffic Volumes AM Peak Hour**,** and Figure IV.K-11, Future (2012) With Project Traffic Volumes PM Peak Hour**,** show future traffic volumes with implementation of the Proposed Project.

As shown in Table IV.K-11, Critical Movement Analysis (CMA) Summary Future (2012) Traffic Conditions – Without and With Project, under the future 2012 Without Project condition, the Proposed Project would not have a significant impact on any study intersection. Six of the seven study intersections would operate at acceptable levels of service, LOS D or better, during both the AM and PM peak hour. The remaining intersection would operate at LOS F during the AM peak hour.

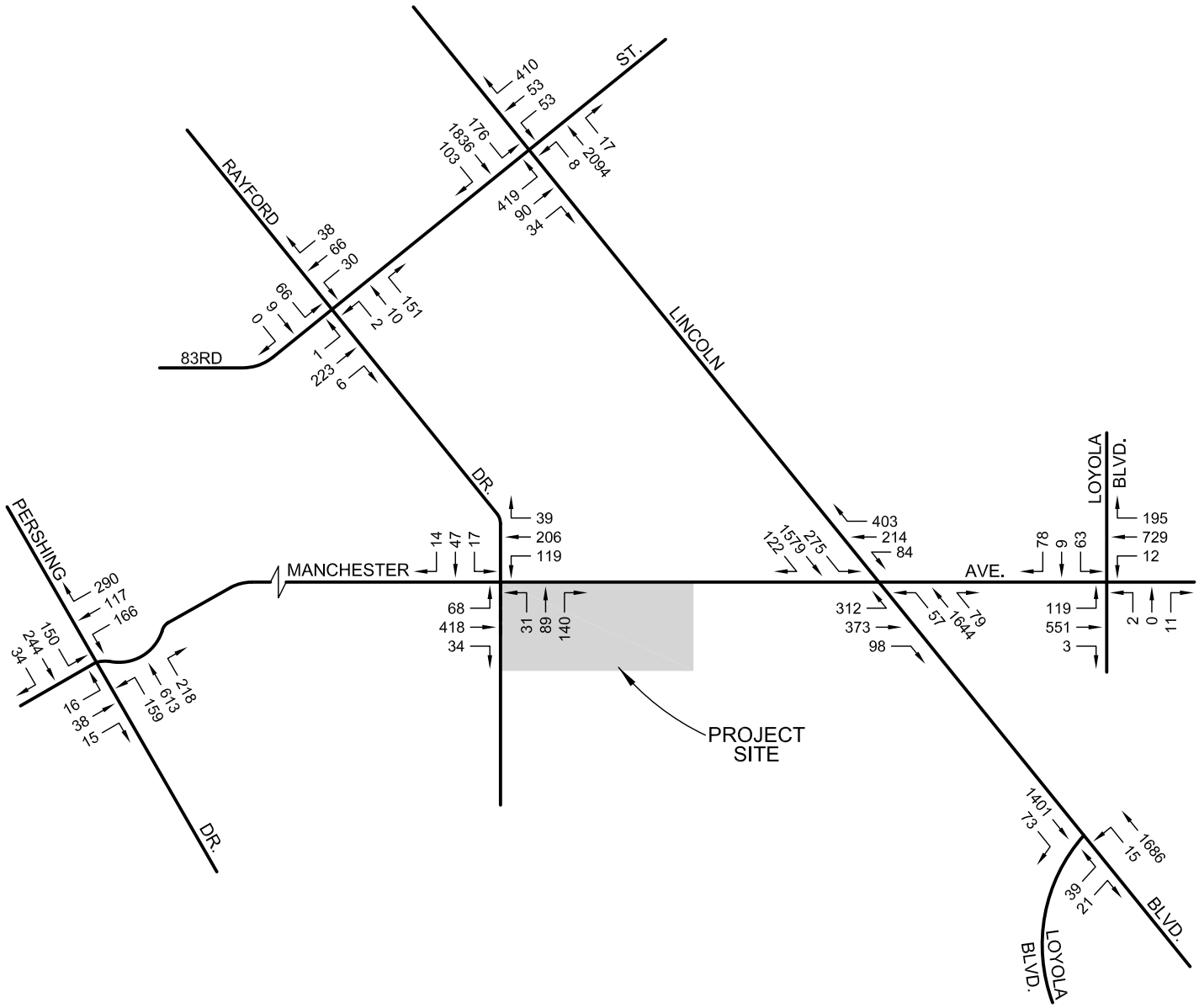
Table IV.K-11
Critical Movement Analysis (CMA) Summary
Future (2012) Traffic Conditions – Without and With Project

No.	Intersection	Peak Hour	Without Project		With Project			
			CMA	LOS	CMA	LOS	Change	Impact
1.	83rd Street and Lincoln Boulevard	AM	1.011	F	1.015	F	0.004	**No**
		PM	0.826	D	0.825	D	-0.001	**No**
2.	83rd Street and Rayford Drive	AM	0.485	A	0.489	A	0.004	**No**
		PM	0.432	A	0.428	A	-0.004	**No**
3.	Manchester Avenue and Pershing Drive	AM	0.365	A	0.366	A	0.001	**No**
		PM	0.455	A	0.455	A	0.000	**No**
4.	Manchester Avenue and Rayford Drive	AM	0.328	A	0.332	A	0.004	**No**
		PM	0.237	A	0.233	A	-0.004	**No**
5.	Manchester Avenue and Lincoln Boulevard	AM	0.712	C	0.719	C	0.007	**No**
		PM	0.824	D	0.819	D	-0.005	**No**
6.	Manchester Avenue and Loyola Boulevard	AM	0.350	A	0.350	A	0.000	**No**
		PM	0.444	A	0.445	A	0.001	**No**
7.	Loyola Boulevard and Lincoln Boulevard	AM	0.279	A	0.281	A	0.002	**No**
		PM	0.483	A	0.481	A	-0.002	**No**

Source: Crain & Associates, January 2009.

Congestion Management Program

To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by Metro, the local CMP agency, designating a highway network that includes all state highways and principle arterials within the County and monitoring the network's LOS to implement the



Source: Crain & Associates, January 21, 2009.

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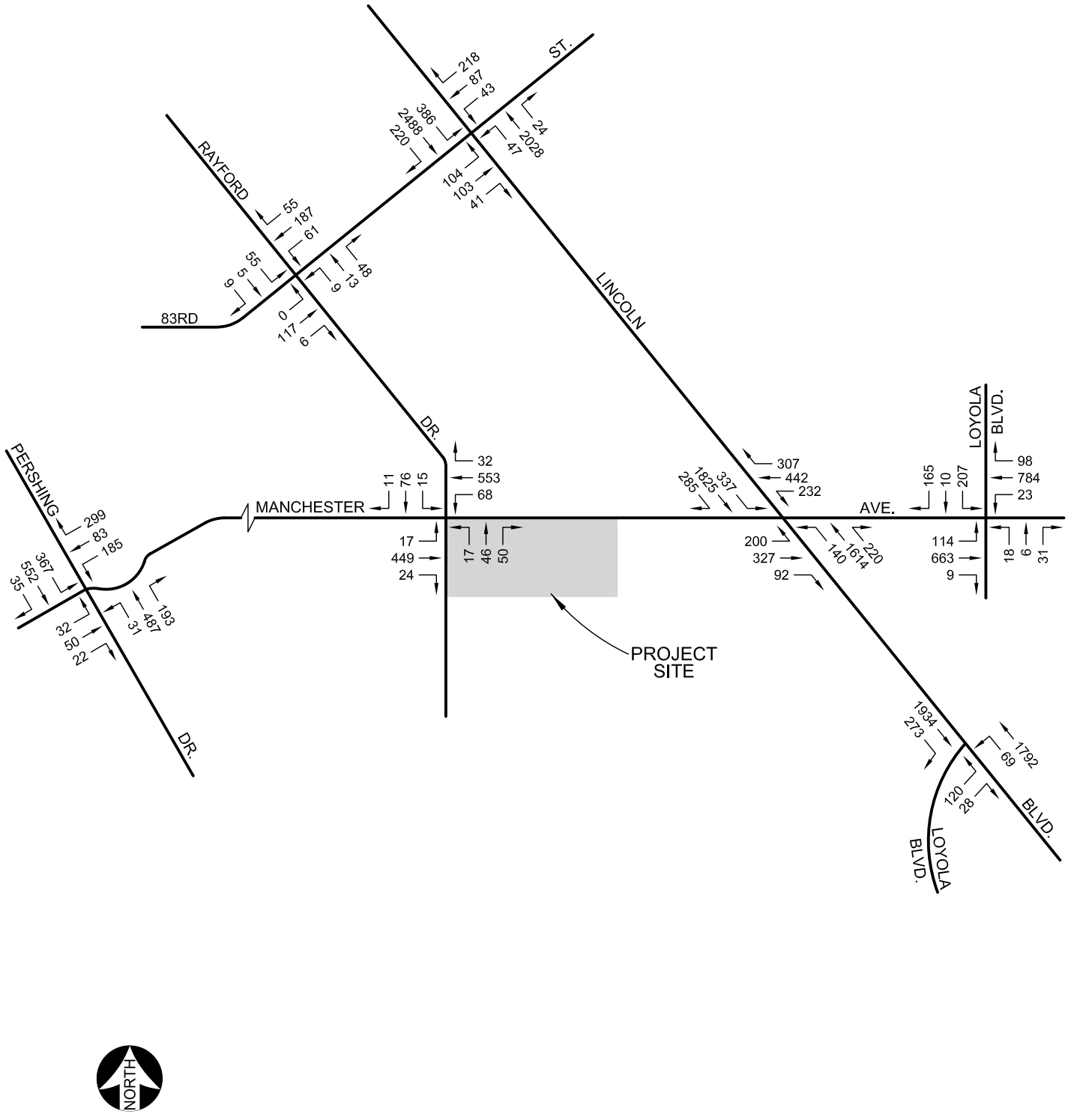
Figure IV.K-10
Future (2012) With
Project Traffic Volumes AM Peak Hour



Source: Crain & Associates, January 21, 2009.

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Figure IV.K-11
Future (2012) With
Project Traffic Volumes PM Peak Hour

statutory requirements of the CMP. This monitoring of the CMP network is one of the responsibilities of local jurisdictions. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

The local CMP requires that all CMP intersections be analyzed where a project would likely add 50 or more trips during the peak hours. A review of the project trip distribution and net project traffic additions to the project vicinity shows that the Proposed Project would not add 50 or more trips during the AM and PM peak hours to any CMP monitored intersection.

In addition, any CMP monitored freeway segment where a project is expected to add 150 or more trips in any direction during the peak hours is also to be analyzed. Based on the project trip distributions described previously, the Proposed Project is not expected to add 150 or more directional trips to any monitored freeway segment. Therefore, no significant, project-related impact would occur at any CMP monitored freeway location and no additional freeway analysis is necessary.

Analysis of Residential Street Traffic

A residential street traffic analysis was also conducted to determine the potential impact of project traffic on the residential street segment of Rayford Drive, south of 85th Street. As outlined in Mitigation Measure K-1, appropriate signs would be posted at the intersection of the alley and Rayford Drive to prohibit project-generated and other traffic from using the alley to travel through the community south of the project site. Specifically, a "No left-turn" sign for westbound traffic will be installed along the alley at Rayford Drive and a "No right-turn" sign for northbound traffic will be installed along Rayford Drive at the alley to prohibit cut-through traffic. Therefore, this selected street segment is considered the most appropriate indicator of traffic impacts that the Proposed Project could have on the surrounding residential street system.

Per LADOT policy, the determination of a residential street traffic impact is based on daily traffic volumes traversing the study street segment. Daily traffic counts were conducted on this residential street segment on April 10, 2008. This daily traffic volume was used as the basis for the residential street impact analysis.

For the analysis of future traffic volume on the residential street segments, future traffic volume was estimated using the same procedures described previously for the development of future peak-hour intersection volumes. The Future Without Project daily traffic volume estimates were based on the ambient traffic growth and related projects volumes. The Future With Project daily traffic volume scenario includes the addition of project traffic. Development of the Proposed Project would not cause an increase in traffic on the residential street segment as there would be a net decrease in daily project trips when compared to the existing uses currently found on-site (see Table IV.K-12, Residential Street Impact Analysis).

Due to the concern of cut through traffic in the communities south of the project site, project site access is not allowed from the south through these communities. As discussed above, appropriate signs would be posted at the intersection of the alley and Rayford Drive to prohibit traffic from traveling through the

Table IV.K-12
Residential Street Impact Analysis

Street Segment	Daily Volume				
	Existing (2008)	Without Project (2012)	Project Traffic	With Project (2012)	Percent Project Traffic
Rayford Drive south of 85th Street	2,350	2,652	-12	2,640	-0.5%
Source: Crain & Associates, January 2009.					

community south of the project site. Specifically, a "No left-turn" sign along the alley way to Rayford Drive and a "No right-turn" sign along Rayford Drive to the alley would be installed at the intersection. Further, the Proposed Project would not cause the study residential street segment to experience an increase in traffic as the Proposed Project would result in a net decrease in daily trips (see Table IV.K-12, Residential Street Impact Analysis, above).

Parking

Parking for the Proposed Project would be provided in three levels of parking (one subterranean level, two aboveground levels) at a rate of 1.83 spaces per unit for a total of 475 parking spaces. The parking area would be constructed behind the joint live/work units with additional parking beneath the residential units. As discussed in Section IV.G, Land Use and Planning, the Proposed Project would require a total of approximately 406.5 resident parking spaces under the current LAMC regulations. Therefore, the 475 parking spaces provided by the Proposed Project would provide more than adequate parking to meet the requirements under LAMC. As such, Proposed Project impacts related to parking would be less than significant.

CUMULATIVE IMPACTS

The analysis of traffic impacts of the Proposed Project examines the effects of future growth in traffic in the region through consideration of traffic generated by the 19 related projects and the application of a growth factor. Consequently, impacts of cumulative growth are already incorporated into the traffic model and area reflected in the Without Project condition in Table IV.K-11, Related Projects Location, Description, and Trip Generation, above. Impacts of the Proposed Project, in conjunction with the related projects, are shown in the With Project column in Table IV.K-11, Related Projects Location, Description, and Trip Generation.

As shown in Table IV.K-11, Related Projects Location, Description, and Trip Generation, development of the Proposed Project would have the potential to combine with the related projects to cause the LOS at one of the study intersections (Manchester Avenue and Lincoln Boulevard) to worsen from LOS B to LOS C during the AM peak hour. However, the increase of 0.007 shown for the Manchester Avenue and Lincoln Boulevard intersection (Table IV.K-11) does not exceed the significance threshold of 0.040 as indicated in Table IV.K-5. Therefore, the Proposed Project's impact is not significant. Nevertheless, as previously discussed, a portion of the Proposed Project has already been approved (134 du) and the Playa

del Oro development is adjacent to the project site (see Related Project No. 1 in Table IV.K-7, and on Figure IV.K-7, Related Projects Location Map). The Traffic Study for the Playa del Oro project concluded that it was expected to significantly impact the intersection of Manchester Avenue and Lincoln Boulevard. However, this impact was mitigated by shortening and modifying the raised median on the east leg of Manchester Avenue; removing the painted chevron island on the west leg of Manchester Avenue, and restriping the east and west legs to provide an additional westbound and eastbound left-turn lane on Manchester Avenue at Lincoln Boulevard. Thereby, reducing the impact at Manchester Avenue and Lincoln Boulevard to less than significant. As such, the Proposed Project, in conjunction with the related projects, would not cause a cumulatively considerable effect and impacts with respect to traffic would be less than significant.

MITIGATION MEASURES

K-1 In accordance with LADOT standards, a "No left-turn" sign for westbound traffic will be installed along the alley at Rayford Drive and a "No right-turn" sign for northbound traffic will be installed along Rayford Drive at the alley to prohibit cut-through traffic.

As discussed in intersection, CMP, and street segment analyses, the Proposed Project would not significantly impact any of the seven study intersections, the CMP network, or the study residential street segment. As shown in Table IV.K-1, the Playa del Oro project on the adjacent site, will implement mitigation measures that will alleviate forecasted traffic increases such that levels of service are not significantly affected pursuant to the City's thresholds (see Table IV.K-4 and Table IV.K-11).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts with respect to traffic, transportation, and parking would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
L. UTILITIES AND SERVICES
1. WATER

This section describes the utility supply and infrastructure that currently serve the project site and surrounding area, assesses potential impacts associated with the project on this supply and infrastructure, and identifies the need for improvements in order to serve the project and related development, if needed. Each utility issue is discussed in its own subsection (1. Water; 2. Sewer; 3. Solid Waste; 4. Electricity Supply; and 5. Natural Gas Supply).

ENVIRONMENTAL SETTING

Water Supplies

The Los Angeles Department of Water and Power (LADWP) is responsible for ensuring that water demand within the City of Los Angeles is met and that State and Federal water quality standards are achieved. The City's water supplies are derived from the following sources: 75 percent from the eastern Sierra Nevada Mountains by way of the Los Angeles Aqueduct (LAA) system, local groundwater, and 25 percent from purchases from the Metropolitan Water District of Southern California (MWD).[1] In addition, water storage is essential for the LADWP to supply water during high demand conditions and provide for firefighting and emergencies. To serve the residents, businesses, and industry of Los Angeles, LADWP has more than 7,200 miles of pipelines, 680,000 water service connections, 59,000 fire hydrants, 100 reservoirs and tanks in the City, and eight storage reservoirs along LAA.[2]

Currently, the existing on-site uses consume an estimated 2,458 gallons of water per day (see Table IV.L-1).

Table IV.L-1
Existing Uses Water Consumption

Land Use	Size	Consumption Rate	Total (gallon/day)
Retail	24,000 sf	102.4 gallons/per 1,000 sf/day	2,458
		Total	**2,458**

sf = square feet
Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002; calculated as 128% of wastewater generation.

[1] *City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan.*

[2] *City of Los Angeles, Department of Water and Power, LADWP Quick Facts and Figures, http://www.ladwp.com/ladwp/cms/ladwp000509.jsp, August 26, 2008.*

Los Angeles Aqueduct

The LAA system extends approximately 340 miles from the Mono Basin to Los Angeles. Water is collected from snowmelt runoff in the eastern Sierra Nevada Mountains, where the City holds water rights, and is conveyed by gravity to the City of Los Angeles.[3] However, the amount of surface runoff collected from the Sierra Nevada is variable because the runoff depends on the annual snowfall. Secondarily, LAA water supplies are supplemented by groundwater pumping, which can also fluctuate year-to-year due to varying hydrological conditions. In recent years, the LAA supplies have been decreased because of environmental obligations to restore the water level of Mono Lake and mitigate dust from Owens Lake.[4]

Local Groundwater

The LADWP extracts groundwater from various locations throughout the Owens Valley, where it owns extensive property, and four local groundwater basins, and appropriates groundwater from its lands in the Owens Valley and in Los Angeles, as part of its long-term groundwater management plan.[5] In addition, the LADWP holds adjudicated extraction rights in the following four local groundwater basins: San Fernando, Sylmar, Central, and West Coast.

MWD Purchases

MWD imports its water supplies from northern California through the State Water Project's California Aqueduct and from the Colorado River by way of MWD's Colorado River Aqueduct. LADWP continues to rely on MWD to meet its current and future supplemental water needs. LADWP is one of twenty-six member agencies that have preferential rights to purchase water from MWD.[6] LADWP has worked with the MWD to develop a framework to allocate water supplies during periods of shortage as well as surplus. MWD's Water Surplus and Drought Management Plan provides a framework to address periods of drought. LADWP intends to work within this framework to acquire water supplies during periods of drought in the future.

MWD plans to meet the long-term needs of its member agencies through water transfer programs, outdoor conservation measures, and development of additional local resources (e.g., recycling, brackish

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[3] *City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, page 3-4.*

[4] *City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, pages 3-4 through 3-6.*

[5] *Inyo County Water Department, Inyo/LA Long Term Water Agreement, http://www.inyowater.org/Water_Resources/water_agreement/default.html, March 31, 2008.*

[6] *City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan.*

water desalination, and seawater desalination). In addition, MWD has more than one million AF of storage capacity available in reservoir facilities.[7]

On December 15, 2008, the United States Fish and Wildlife Service (USFWS) completed its biological opinion on the effects of the operations of the Central Valley Project (CVP) and the California State Water Project (SWP) on the threatened Delta smelt (2008 BiOp). The 2008 BiOp concluded that the coordinated operations of the CVP and SWP, as proposed, are likely to jeopardize the continued existence of the Delta smelt and required restricted operations of the CVP and SWP pumps in the Sacramento-San Joaquin Delta during a defined period in the spring. Several lawsuits challenging the 2008 BiOp ensued.[8] On May 29, 2009, United States District Court Judge Oliver Wanger enjoined the USFWS from setting and implementing unnecessarily restrictive flow restrictions unless it first considers the harm that these decisions and actions are likely to cause humans, the community, and the environment.[9]

The California legislature has been working to find a solution to the Delta issues. On October 11, 2009, Governor Schwarzenegger called for a special session to address California's water crisis to restore the Sacramento-San Joaquin Delta and other ecosystem restoration projects.[10]

Water Supply Infrastructure

Much of the City's water flows from north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering LAAFP undergoes treatment and disinfection before being distributed throughout LADWP's Water Service Area.[11] LAAFP has a design capacity of 600 million gallons per day (gpd). The average plant flow is 450 million gpd in non-summer months and 550 gpd during summer months.

Groundwater quality is closely monitored by LADWP to ensure that it meets both State and Federal water quality standards. LADWP monitors over 90 chemicals and bacteria. Water samples are also regularly

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[7] *Metropolitan Water District of Southern California, Fact Sheets, Fact Sheets & Brochures, http://www.mwdh2o.com/mwdh2o/pages/news/news01.html, March 31, 2008.*

[8] *E.D. Cal, Case Nos. 1:09-CV-00407; 1:09-CV-004422; 1:09-CV-00480; 1:09-CV-631; and 1:09-CV-892.*

[9] *E.D. Cal, Case No. 1:09-CV-00407.*

[10] *Office of the Governor, Newsroom, Press Release 11/11/2009, Gov. Schwarzenegger Calls Special Session to Address California's Water Crisis, website: http://gov.ca.gov/index.php?/press-release/13568/, February 4, 2010.*

[11] *City of Los Angeles Department of Water and Power, Health & Safety, Water Quality, City of Los Angeles Water Services Annual Water Quality Report, 2006 Annual Water Quality Report, http://www.ladwp.com/ladwp/cms/ladwp001965.jsp, March 31, 2008.*

collected and tested from watersheds, reservoirs, groundwater supply wells, storage facilities, and other locations.[12]

Treated water is conveyed throughout the City of Los Angeles by a system of 280 miles of trunk lines that act as the major arteries for water delivery; these trunk lines are 20 inches and greater in diameter.[13] Water is further conveyed by a local system of water mains and lines that also serve the project site.

In addition to providing domestic water service, LADWP also provides water for firefighting services in accordance with the Fire Code of the City of Los Angeles Municipal Code (LAMC). Fire flow requirements are closely related to land use as the amount of water necessary for fire protection varies with the type of development found in the immediate community and the proposed development itself. City established fire flow requirements vary from 2,000 gallons per minute in low-density residential areas to 12,000 gallons per minute in high-density commercial and industrial areas. In all cases, a residual water pressure of 20 pounds per square inch (PSI) is to remain in the pipes in the project area while the appropriate fire flow is streaming.

Regulatory Framework

State Water Conservation

State of California Senate Bills (SB) 610 and 221 became effective January 1, 2002, amending sections 10910- 10915 of the State Water Code, and requiring that counties and cities consider the availability of adequate water supplies for certain new large development projects. These statutes require that cities and counties obtain from the local water supplier written verification of sufficient water supply to serve proposed large development projects in their jurisdiction. Pursuant to SB 610, projects that are required to obtain water supply assessments include the following:

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- a proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- a proposed hotel or motel of more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;

[12] *Los Angeles Department of Water and Power, Supply & Reliability, Los Angeles Aqueduct, Water Quality, http://www.ladwp.com/ladwp/cms/ladwp000547.jsp, March 31, 2008.*

[13] *City of Los Angeles Department of Water and Power, Supply & Reliability, Water Improvement Projects, Trunk Line Improvements, http://www.ladwp.com/ladwp/cms/ladwp004121.jsp, March 31, 2008.*

- a mixed-use project that falls in one or more of the above identified categories; or
- a project not falling in one of the above-identified categories, but would demand water equal or greater to a 500 dwelling unit project.

Pursuant to SB 221, subdivisions that are required to obtain a Water Supply Assessment are defined as:

- "subdivision" means a proposed residential development of more than 500 dwelling units, except that for a public water system that has fewer than 5,000 service connections, "subdivision" means any proposed residential development that would account for an increase of 10 percent or more in the number of the public water system's existing service connections.

Municipal Water Conservation

Water use in the City of Los Angeles is currently approximately equal to the water use in the City 20 years ago despite an increase in population of over 750,000 persons during this period.[14] This stability in water use is mostly attributed to the City's public education campaigns and water conservation programs over the past 15 years. In addition to conformance with SB 610 and SB 221, LADWP has instituted its own City level water conservation measures, which include:

- "Water Closet, Urinal and Showerhead Regulations" (LAMC Sections 122.00–122.10) – Reduces water consumption by requiring new buildings to include water conservation fixtures (such as ultra-low flush toilets, urinals, taps, and showerheads) and plumbing fixtures that reduce water loss from leakage in order to obtain City building permits. In addition, there are provisions requiring xeriscaping (i.e., the use of low-maintenance, drought-resistant plants).
- "The Emergency Water Conservation Plan of the City of Los Angeles" (LAMC Sections 121.00-121.13) – Provides for the implementation of a citywide phased water conservation program to respond to dry weather periods based on LADWP's evaluation of the projected supply and demand of City water supplies. The phased conservation program provides for mandatory water conservation measures at the user level and customer use curtailment of normal water usage.
- LADWP is also continuing its water recycling efforts to reduce further the demand on imported water. Currently, almost 64,000 AFY of the City's wastewater is recycled. Approximately 1,950 AFY of recycled water is used for municipal and industrial purposes; 28,000 AFY of recycled water is used for environmental enhancement and recreation in the Sepulveda Basin; and approximately 34,000 AFY of recycled water is sold to MWD, which then provides further treatment to meet demands within its service area.[15]

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[14] *City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, Page ES-3.*

[15] *City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, page ES-8.*

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to water are determined based on the proposed increase in water demand and the capacity of existing and proposed infrastructure. The existing water demand is compared to the Proposed Project's water demand and water infrastructure capacity, including improvements associated with the Proposed Project.

Water consumption for the Proposed Project was calculated based on standard wastewater generation rates plus an additional percentage to account for outdoor water usage.

Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Proposed Project would have a potentially significant water impact if it would:

(a) Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause a significant environmental effect; or

(b) Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Based upon criteria established in the *L.A. CEQA Thresholds Guide*, whether or not the Proposed Project would have a significant impact is determined on a case-by-case basis considering the following factors:

(a) The total estimated water demand for the project;

(b) Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;

(c) The amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and

(d) The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Project Impacts

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, in a four- to six-story building above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the

Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

As shown in Table IV.L-2, Proposed Project Water Consumption, the Proposed Project would result in a net increase in consumption of approximately 21,804 gpd of water over baseline conditions.

Table IV.L-2
Proposed Project Water Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	189 gallons/unit/day	49,140
Multi-Purpose/Gym	1,400 sf	320 gallons/ 1,000 sf/day	448
		Proposed Project Subtotal	***49,588***
Less Baseline Conditions			
Existing Retail	24,000 sf	102.4 gallons/1,000 sf/day	2,458
Previously-Approved Residential Building	134 units	189 gallons/unit/day	25,326
		Baseline Conditions Subtotal	***27,784***
		Net Increase in Water Consumption over Baseline	**21,804**

Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002. Water consumption calculated as 118% of wastewater generation for residential uses and 128% for non-residential uses.
Source (table): Christopher A. Joseph & Associates, February 2009.

Water Supply

The Proposed Project does not meet any of the criteria for SB 610 or SB 221; as such, a Water Supply Assessment is not required.

LADWP addresses issues of water supply in its Final Year 2005 Urban Water Management Plan (UWMP). The UWMP considers growth that is projected in regional planning documents, such as SCAG's Blueprint Report, estimates the projected future water demand associated with this growth, and identifies water sources and ways to meet the demand during various hydrological conditions over the next 25 years. According to the UWMP, LADWP has analyzed three different hydrological conditions to determine the reliability of water supplies for the City of Los Angeles: average, single dry year, and multi-year drought. In each of the three hydrological conditions, the projected water demand was calculated taking into account growth in billing data, water conservation efforts, and demographics. The

UWMP states that LADWP can reliably meet the projected water demand in each of the hydrological conditions over the next 25 years with its supply portfolio.[16]

As shown on Table IV.L-2, the project would result in a net consumption increase of approximately 21,804 gpd. Based on the existing land use designation and zoning for the project site, the site could be developed with approximately 236 residential units, assuming no land use designation or zoning changes. This development would result in a net consumption increase of 16,820 gpd of water.

As described in Section IV.G, Land Use and Planning, the Proposed Project would be consistent with the policies identified in the City of Los Angeles General Plan. In addition, the Westchester-Playa Del Rey Community Plan designates the project site as "Community Commercial", is approximately 4,984 gpd of water less than estimated for the project. Because the water consumption associated with the project is consistent with what would occur based on what the City has planned for the project site, the Proposed Project would be consistent with the UWMP. Therefore, the project's demand for water supply could be accommodated by the LADWP. Additionally, the Proposed Project would not consume water in excess of the water supplies available to the City of Los Angeles. Impacts related to water supply would be less than significant.

Local Water Infrastructure

According to the Ten-Year Capital Improvement Program for the Fiscal Years 2003-2012 of the Water Services Organization (WSO) of LADWP, WSO is in a 10-year process of capital upgrades to the water infrastructure system of the City of Los Angeles. Through this program, WSO can provide reliable sources of water to the residents of the City.[17] No infrastructure deficiencies are known to occur in the project vicinity, and it is anticipated that the existing infrastructure system could serve the Proposed Project. Further, during the project's construction phase, the project applicant would be required to coordinate with LADWP to confirm water conveyance capacity and would be required to install any upgrades that would be necessary. Through this process, project impacts related to water conveyance infrastructure would be less than significant.

Water Quality

The Proposed Project would result in a net increase in water consumption of approximately 21,804 gpd over the existing uses. LAAFP has a remaining treatment capacity of approximately 150 million gallons per day in non-summer months and 50 million gallons per day during summer months. For purposes of a conservative analysis, it is assumed that LAAFP only has 50 million gallons of remaining capacity. The net increase in water consumption by the Proposed Project represents approximately 0.04 percent of the

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[16] *City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, page 24.*

[17] *City of Los Angeles Department of Water and Power, Water Services Organization, Ten-Year Capital Improvement Program for the Fiscal Years 2003-2012, http://www.ladwp.com/ladwp/cms/ladwp004791.pdf, March 31, 2008.*

remaining treatment capacity at LAAFP. As such, impacts related to treatment capacity as a result of the Proposed Project would be less than significant.

Fire Flow

According to the Fire Code, the overall fire flow requirement for the Proposed Project (located in a high density residential and commercial neighborhood) is 4,000 gpm from four fire hydrants flowing simultaneously with a 20 PSI minimum residual pressure.[18] According to LADWP, a 10-inch water main is required to satisfy the required 4,000-gpm fire flow. As discussed previously, should it be determined that the existing water main infrastructure is unable to accommodate the estimated water consumption for the project during the project's construction phase, the project applicant would be required to coordinate with LADWP to confirm water conveyance capacity and would be required to install any upgrades that would be necessary, including those for fire flow. Through this process, project impacts related to fire flow would be less than significant.

CUMULATIVE IMPACTS

Water Supply

Implementation of the Proposed Project in combination with the related projects identified in Section II, Environmental Setting, would increase the demand for water supplies provided by LADWP. As shown in Table IV.L-3, Cumulative Water Consumption, the related projects within the City of Los Angeles, Culver City, and Marina Del Rey would consume approximately 1,695,919 gpd of water. Similar to the Proposed Project, water consumption for the related projects was estimated utilizing the 118 percent method for calculating residential water consumption and the 128 percent method for non-residential water consumption, which uses standard wastewater rates and then adds a percentage of the totals (18 percent for residential, 28 percent for non-residential) to include outdoor water usage.

Implementation of the Proposed Project in combination with the nineteen related projects identified within LADWP service area would increase the demand for water. The net cumulative water consumption of the related projects in combination with the Proposed Project is estimated at 1,717,723 gpd of water. LADWP anticipates that its projected water supplies available during the average, single dry year, and multi-year drought study scenarios, as included in the 20-year projection contained in the 2005 UWMP, would meet the projected water demand associated with the planned future uses in LADWP system.[19] Therefore, cumulative impacts to water supply would be less than significant.

Implementation of the Project in conjunction with regional growth would increase the demand for the water supply in the City. Using SCAG regional growth forecast in calculating future water demands for its service area in the Blueprint Report, MWD takes into consideration anticipated water demands of

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[18] *City of Los Angeles Municipal Code, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.07, Table 9-C.*

[19] *City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, page ES-2 – ES-6.*

LADWP and states that MWD's water supplies are fully reliable to meet the demands of its customers (including LADWP) in all hydrologic conditions through at least 2030. Even during shortages, MWD expects that it will be able to meet its member agencies' long-term needs through a combination of actions, including water-transfer programs, outdoor conservation measures, and development of additional local resources, such as recycling, brackish water desalination, and seawater desalination. Additionally, MWD has more than approximately 3.8 million AF of storage capacity available in reservoirs and banking/transfer programs.

LADWP has outlined aggressive short-term water conservation strategies in its Water Supply Action Plan that will be implemented and enforced to ensure a sufficient and reliable water supply in the event of a water supply shortage. These strategies include, but are not limited to: 1) more rigorous enforcement of existing prohibited uses of water, as well as new and expanded prohibited uses; 2) additional restrictions on landscape watering and washing/rinsing of vehicles, and increased monetary penalties for violations; 3) expansion of the agency's rebate and incentive program to further encourage water conservation efforts; and 4) increased rates to encourage water conservation and curb usage. In the unlikely event that an unexpected water supply shortage was to occur, LADWP would intensify, accelerate, and expand on these short-term conservation strategies to continue to ensure a sufficient and reliable water supply.

As discussed previously, the project's water demand is consistent with what has been anticipated for the project site, based on the existing land use designation and zoning for the site and is consistent with the future demand assumptions made by MWD and could be accommodated by LADWP's existing entitlements. Thus, the project's contribution to the cumulative demand for water supply would not be considerable. Therefore, cumulative water impacts would be less than significant.

Water Treatment Facilities

The Proposed Project, in conjunction with the related projects located within the City of Los Angeles, would cumulatively consume approximately 1,717,723 gpd of water (refer to Table IV.L-3). As stated above, LAAFP has a remaining treatment capacity of approximately 150 million gallons per day in non-summer months and 50 million gallons per day during summer months. For purposes of a conservative analysis, it is assumed that LAAFP only has 50 million gallons of remaining capacity. The cumulative consumption of water by the Proposed Project and the related project represents approximately 3.4 percent of the remaining treatment capacity at LAAFP. As such, cumulative impacts on treatment capacity as a result of the Proposed Project and related projects would be less than significant.

Table IV.L-3
Cumulative Water Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (gallons/day)
1	SWC Lincoln Blvd./Manchester Ave.	Playa del Oro/Furama Redevelopment				
		539	du	Apartment	188.8 gallons/du/day	101,763
		27,000	sf	Retail	102.4 gallons/1,000 sf/day	2,765
		(500)	rm	Hotel (to be removed)	166.4 gallons/rooms/day	(83,200)

Table IV.L-3 (Continued)
Cumulative Water Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (gallons/day)
		(10,420)	sf	Retail (to be removed)	102.4 gallons/1000 sf/day	(1,067)
		(10,590)	sf	Office (to be removed)	192 gallons/1,000 sf/day	(2,033)
		(4,800)	sf	High-Turnover Restaurant (to be removed	25.6 gallons/seat/day	(4,480)[i]
2	7215 W. Manchester Ave.[a]	4,850	sf	Walk-In Bank	102.4 gallons/1,000 sf/day	497
3	6225 W. Century Blvd.	180	du	Hotel	166.4 gallons/room/day	29,952
4	7900 S. Loyola Blvd.	16	st	Daycare Center	10.2 gallons/st/day	163
5	7831 Sepulveda Blvd.	600	st	School Expansion	10.2 gallons/st/day	6,120
6	5401 Beethoven St.	420	st	Private School	10.2 gallons/st/day	4,284
7	8632 Sepulveda Blvd.	3,621	sf	Walk-In Bank	102.4 gallons/1,000 sf/day	371
8	5550 Grosvenor Blvd.	208	du	Condominium	188.8 gallons/du/day	39,270
9	4500 Via Marina[j]	120	du	Apartment (expansion)	188.8 gallons/du/day	22,656
10	Southern terminus of Fiji Wy. (Parcel 64)[b, j]	478	du	Multi-Family Residential	188.8 gallons/du/day	90,246
		500	sf	Restaurant	384 gallons/1,000 sf/day	192
		34	slip	Boat	n/a[k]	-
		(224)	du	Apartment (to be removed)	188.8 gallons/du/day	(42,291)
11	W/o Fiji Wy. Near Terminus Fisherman's Village[c, j] (Parcels 55/56/W)	132	rm	Hotel	166.4 gallons/room/day	21,964
		1,230	seat	Restaurant	38.4 gallons/seat/day	47,232
		24,250	sf	Retail	102.4 gallons/1,000 sf/day	2,483
		5,200	sf	Office	192 gallons/1,000 sf/day	998
		26	slip	Boat	n/a[k]	-
		(12,984)	sf	Retail/Commercial (to be removed)	102.4 gallons/1,000 sf/day	(1,330)
		(16,149)	sf	Restaurant (to be removed)	38.4 gallons/seat/day	(23,040)[h]
		(17)	slip	Boat (to be removed)	n/a[k]	-
12	W/o Lincoln Blvd., N/o Fiji Wy. (Parcels 50&83)[j]	4,700	sf	Specialty Retail	102.4 gallons/1,000 sf/day	481
13	12700 Braddock Dr.	134,557	sf	Warehouse	25.6 gallons/1,000 sf/day	3,445
		1,357	sf	Office	192 gallons/1,000 sf/day	261
		(58,323)	sf	University of CA Laundry Building (to be removed)	102.4 gallons/1,000 sf/day	(5,972)

Table IV.L-3 (Continued)
Cumulative Water Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (gallons/day)
14	S/o Jefferson Blvd., E/o Lincoln Blvd.	Playa Vista Phase I				
		3,246	du	Condominium	188.8 gallons/du/day	612,845
		2,142,050	sf	Office	192 gallons/1,000 sf/day	411,274
		25,000	sf	Retail	102.4 gallons/1,000 sf/day	2,560
		1,129,900	sf	Production & Staging Support	102.4 gallons/1,000 sf/day	115,702
		65,000	sf	Community Serving Uses	102.4 gallons/1,000 sf/day	6,656
		(2,166)	du	Condominium	188.8 gallons/du/day	(408,941)
		(221,000)	sf	Office	192 gallons/1,000 sf/day	(42,432)
		(12,500)	sf	Retail	102.4 gallons/1,000 sf/day	(1,280)
15	S/o Jefferson Blvd./ Westlawn Ave.[d]	Playa Vista Phase II				
		175,000	sf	Office	192 gallons/1,000 sf/day	33,600
		2,600	du	Apartment	188.8 gallons/du/day	490,880
		150,000	sf	Shopping Center	102.4 gallons/1,000 sf/day	15,360
		40,000	sf	Community Serving Uses	102.4 gallons/1,000 sf/day	4,096
16	N/s Fiji Wy., w/o Admiralty Wy. (Parcel 52/GG)[j]	345	Vessel	Dry Stack Storage Facility	n/a[k]	-
		30	Vessel	Mast Up Storage Space	n/a[k]	-
		1,500	sf	Sheriff Boatwright Facility	192 gallons/1,000 sf/day	288
17	1 LMU Dr.[e]	7,800	st	Loyola Marymount University Master Plan	23 gallon/st/day	179,400
18	6161 W Centinela Ave.[f]	Carlyle Radisson				
		342,409	sf	Office	192 gallons/1,000 sf/day	65,743
19	9204 Airport Blvd.[g]	Airport Blvd Carwash				
		15,380[l]	sf	Car Wash	(Avg. Process Flow)[m]	-
		(15,251)	sf	Car Rental Facility (to be removed)	102.4 gallons/1,000 sf/day	(1,562)
					Related Projects Total	**1,695,919**
					Proposed Project Net Total	**21,804**
					Cumulative Total	**1,717,723**

[a] *Traffic impact study for Bank of America project at Lincoln Boulevard/Manchester Ave., Crain & Associates, June 2008.*
[b] *Traffic analysis for a Proposed 478-unit Residential Development on Parcel 64 in Marina del Rey, Crain & Associates, January 2007.*
[c] *Traffic study for the Fisherman's Village Retail and Commercial Development Project, Hirsch Green Traffic Consultant, March 2007.*
[d] *Traffic analysis for the Village at Playa Vista Project, Kaku Associates, Inc. and Raju Associates, Inc., July 2003.*
[e] *No net increase of number of students or expansion of campus square footage. Therefore, no net increase in trip generation for the project.*
[f] *Traffic Impact Study Report for Proposed Entrada Office Project at 6161 W. Centinela Avenue, Culver City, Crain & Associates, November 16, 2007. Added as part of the analysis as a worst case scenario.*
[g] *Memorandum of Understanding (MOU) for the 9204 Airport Boulevard Carwash Project, Crain & Associates, March 19, 2008.*

Table IV.L-3 (Continued)
Cumulative Water Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (gallons/day)

[h] *Estimated as 600 seats.*
[i] *Estimated as 175 seats.*
[j] *Located in Marina Del Rey and added as part of the analysis as a worst case scenario.*
[k] *Uses are not anticipated to consume water, therefore no consumption rate was used.*
[l] *Based on telephone communication with Helen Shi at Crain & Associates, July 1, 2008.*
[m] *The Bureau of Sanitation does not have a standard average process flow for car washes, instead process flows are provided by the developer and are unique to each car wash. Therefore, no rate is available to calculate water consumption.*
Source: Crain & Associates, Traffic Impact Study for Residential Project at Lincoln Boulevard/Manchester Avenue (8601 Lincoln Boulevard), City of Los Angeles, June 23, 2008, p. 27-29.

MITIGATION MEASURES

Because no significant impacts to water service were identified, no mitigation measures are required. However, the City requires the following standard measures to ensure that impacts are as less than significant:

L-1. The landscaped irrigation system shall be designed, installed, and tested to provide uniform irrigation coverage for each zone. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets. Each zone (sprinkler valve) shall water plants having similar watering needs (do not mix shrubs, flowers and turf in the same watering zone).

Automatic irrigation timers shall be set to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times shall be adjusted for all zones seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.

The irrigation systems shall also 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; and
- Use of landscaping contouring to minimize precipitation runoff.

L-2. Drought-tolerant, low water consuming plant varieties shall be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1988, "The Unthirsty 100," pp. 74-83, or consult a landscape architect.

L-3. The Project Applicant shall use recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary).

L-4. The Project Applicant shall install ultra-low-flush high-efficiency toilets (1.28 gallons/flush or less, includes dual flush), ultra-low-flush high-efficiency urinals (0.5 gallons/flush or less, includes waterless), and water-saving showerheads (2.0 gallons/minute or less). Low flow faucet aerators shall be installed on all sink faucets with a faucet flow rate of 1.5 gallons/minute or less.

L-5. Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). Cooling towers shall be operated at a minimum of 5.5 cycles of concentration.

L-6. The Project Applicant shall install domestic water heating systems located in close proximity to point(s) of use. Tank-less and on-demand water heaters shall be used as feasible.

L-7. The Project Applicant shall install high-efficiency clothes washers (water factor of 6.0 or less) where clothes washers are provided, and high-efficiency dishwashers (Energy Star rated) shall be installed where dishwashers are provided. Water conserving clothes washers and dishwashers are now available from many manufacturers. Water savings also represent energy savings, in that the water saved by these appliances is typically heated.

L-8. The Project Applicant shall install onsite water recycling systems for wastewater discharge for commercial laundries, dye houses, food processing, certain manufacturing operations, etc. (subject to a payback threshold of five years or less).

L-9. Single-pass cooling systems shall be prohibited.

L-10. The Project Applicant shall install metering systems as follows:

- All dwelling units shall have individual metering and billing for water use; and
- All irrigated landscapes of 5,000 square feet or more require separate metering or submetering.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to water service would be less than significant.

ENVIRONMENTAL SETTING

Existing Conditions

The City of Los Angeles Department of Public Works Bureau of Sanitation Division (LABS) provides sewer conveyance infrastructure and wastewater treatment services to the project area. The Hyperion Treatment Plant (HTP), located west of Los Angeles International Airport in Playa del Rey, provides treatment capacity for wastewater flows generated throughout the City of Los Angeles, including the project area. The HTP has a design capacity of 450 million gallons per day (gpd) and currently treats an average of approximately 362 million gpd to primary and secondary treatment standards, using three levels of filtration treatment before discharging the treated wastewater five miles offshore.[20] The remaining capacity at the HTP is therefore approximately 88 million gpd or approximately 20 percent of its total capacity.

The Hyperion Service Area (HSA) encompasses approximately 328,000 acres, or approximately 515 square miles, of the greater Los Angeles area and serves approximately four million people. HSA also serves 53,000 acres outside the jurisdiction of the City of Los Angeles on a contractual basis. HSA includes approximately 96 percent of the total area served by LABS.

The sewer infrastructure in the vicinity of the project site includes existing eight-inch line on Loyola Boulevard. The sewage from the existing pipe flows to a 10-inch and a 15-inch pipe on Loyola Boulevard, and then feeds into an 18-inch line on Northside Parkway before discharging to a 114-inch line on Westchester Parkway.[21] The design capacities at the current flow level (d/D) of 50 percent for the eight-inch line is 537,809 gpd; for the 10-inch line is 455,475 gpd; for the 15-inch line is 1.93 million gpd; for the 18-inch is 1.09 million gpd; and for the 114-inch line is 122.40 million gpd.[22] The sewer system's d/D currently is approximately 26 percent for the 10-inch line and 18 percent for the 18-inch line.[23] There are two sewer maintenance holes located on the project site, and three maintenance holes located on the Playa Del Oro project site.[24]

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[20] *City of Los Angeles, Department of Public Works Bureau of Sanitation Division, Wastewater Website, Facts and Figures, http://www.lacity.org/san/wastewater/factsfigures.htm, March 31, 2008.*

[21] *City of Los Angeles Department of Public Works, Bureau of Engineering, Navigate L.A., http://navigatela.lacity.org, July 2, 2008.*

[22] *Letter correspondence with Brent Lorscheider, Acting Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, City of Los Angeles Department of Public Works, September 15, 2008.*

[23] *Letter correspondence with Brent Lorscheider, Acting Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, City of Los Angeles Department of Public Works, September 15, 2008.*

The existing uses on the project site currently generate an estimated 1,920 gpd of wastewater (see Table IV.L-4).

Table IV.L-4
Existing Uses Wastewater Generation

Land Use	Size	Generation Rate	Total (gallon/day)
Retail	24,000 sf	80 gallons/1,000 sf/day	1,920
		Total	**1,920**

sf = Square Feet
Source: Brent Lorscheider, Acting Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, City of Los Angeles Department of Public Works, September 15, 2008.

Regulatory Framework

Wastewater Facilities Plan/Integrated Resources Plan

The City's sewer system is subject to Section 201 of the Federal Clean Water Act (CWA). According to CWA, the City must adopt a facilities plan in accordance with the United States Environmental Protection Agency (USEPA) Rules and Regulations, 40 CFR, Section 35.917. Section 201 specifies the following:

> *Facilities planning will demonstrate the need for facilities and, by a systematic evaluation of feasible alternatives, will also demonstrate that the proposed measures represent the most cost-effective means of meeting established effluent and water quality goals while recognizing environmental and social considerations.*[25]

The City prepared a Wastewater Facilities Plan (WFP) in 1982 and updated it in 1991. The 1991 WFP update planned for facilities through the year 2010 and currently regulates wastewater facilities in the City. WFP is focused primarily on developing cost effective construction improvements and analyzes wastewater, water recycling, and storm-water services in the City.[26]

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[24] *City of Los Angeles Department of Public Works, Bureau of Engineering, Navigate L.A., http://navigatela.lacity.org, July 2, 2008.*

[25] *City of Los Angeles Integrated Resources Plan Facilities Plan, Volume 1, July 2004, Revised November 2005, page 3-1, http://www.lacity.org/san/irp/documents/v1-1of3-wastewater-management.pdf, March 31, 2008.*

[26] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Integrated Resources Program, http://www.lacity.org/san/irp/About_IRP.htm, March 31, 2008.*

Wastewater System Facilities

Hyperion Treatment Plant

As discussed above, HTP is located in the Playa del Rey community of the City of Los Angeles and serves an area of approximately 515 square miles, 90 percent of which is located within the City of Los Angeles. HTP is subject to the State Ocean Plan, the Clean Water Enforcement and Pollution Prevention Act of 1999 (SB 709), and a National Pollution Discharge Elimination System (NPDES) Permit (CA0109991). HTP meets all existing requirements under these regulations, although its NPDES permit expired in 1999. HTP is currently operating under a renewal permit.[27] Furthermore, HTP is subject to City of Los Angeles Ordinance No. 166,060, which limits the annual increase in wastewater discharge from HTP to 5 million gpd.[28]

Wastewater Conveyance Facilities

Over 6,700 miles of sewer lines convey wastewater to the City's four wastewater treatment plants, which include HTP, the Terminal Island Treatment Plant, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant. Approximately 550 million gpd flow through the system, which is regulated by Federal and local entities.[29]

The Los Angeles Regional Water Quality Control Board enforces Section 122.41(m) of part 40 of the Code of Federal Regulations (CFR), which prohibits the bypassing of water treatment facilities and sanitary sewer overflows.

In addition to the CFR, the sewer conveyance system is subject to regulation by the South Coast Air Quality Management District, which responds to claims regarding odors.

The City also regulates the sewer conveyance system through the Collection System Settlement Agreement (CSSA) and the ten-year City sewers program, which define maintenance and construction project schedules and are currently managing approximately 100 sewer infrastructure improvement projects.[30] CSSA is a settlement agreement that was reached in 2004 to resolve a lawsuit brought against the City by the Santa Monica Baykeeper and other community organizations after a number of sanitary

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[27] *State of California, Water Resources Control Board, Board Decisions, Adopted Orders, Permit Search Tool, http://www.waterboards.ca.gov/rwqcb4/board_decisions/adopted_orders/by_permits_tools.shtml, March 31, 2008.*

[28] *City of Los Angeles, Environmental Affairs Department, CEQA, L.A. CEQA Thresholds Guide, 2006, http://www.cityofla.org/EAD/EADWeb-AQD/thresholdsguide.htm, March 31, 2008.*

[29] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Integrated Resources Program, Wastewater System, http://www.lacity.org/san/irp/Wastewater.htm, March 31, 2008.*

[30] *City of Los Angeles, Department of Public Works, LA Sewers, City Sewers, Current Construction, http://www.lasewers.org/sewers/current_projects/index.htm, March 31, 2008.*

sewer overflows occurred in the City in February of 1998. CSSA requires the City to enhance, repair, and update the City's sewer system and sets specific timelines for the City to complete the upgrades. In addition, the agreement mandates that the City spend $8.5 million in supplemental environmental enhancement projects.[31] The City must prepare annual progress reports detailing its success at meeting the terms and goals of the agreement. The fourth annual progress report, the Fiscal Year 2007-2008 progress report published in August 2008, indicates that the City is in full compliance with CSSA and in many cases has gone beyond the requirements. The 10-year City sewers program was put into place in order to carry out the mandates of CSSA, which has a compliance period of 10 years.

City Permits

Section 62.105 of the City of Los Angeles Municipal Code requires permits to be obtained for construction on any property, street, or other right-of-way owned by, to be owned by, or under control of the City (e.g., sewers, sidewalks, curbs, gutters, pavement, grading, storm drains, etc.). A type "B" Permit is required for extensive public works improvements, such as the installation of sewer, storm drains, street lighting, and traffic signals. A Type "S" (Sewer) Permit is required to connect a property's sewer line to the City's sewer system or to repair and existing connection.

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to wastewater are determined based on the proposed increase in wastewater generation and the capacity of existing and proposed wastewater infrastructure. The existing sewer capacity and wastewater generation is compared to the Proposed Project's wastewater generation and future sewer capacity, including improvements associated with the Proposed Project. Wastewater generation is estimated based on generation rates provided by Brent Lorscheider, Acting Division Manager in the Wastewater Engineering Services Division of the City of Los Angeles Department of Public Works' Bureau of Sanitation in a service letter response dated September 15, 2008.

Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Proposed Project would have a potentially significant wastewater impact if it were to:

(a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;

(b) Require or result in the construction of a new wastewater treatment facility or expansion of existing facilities, the construction of which could cause significant environmental effects;

[31] *City of Los Angeles Department of Public Works, LA Sewers, Collection System Settlement Agreement, Annual Report Fiscal Year 2007-2008, http://www.lasewers.org/cssa/annualreports.html, February 2, 2009..*

(c) 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; or

(d) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

(b) The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its amendments.

Project Impacts

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, in a four- to six-story building above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 units, resulting in a net increase of 126 dwelling units. Ads the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

As shown in Table IV.L-5, Proposed Project Wastewater Generation, the Proposed Project is anticipated to generate a net increase of approximately 18,590 gpd of wastewater over the baseline conditions.

Table IV.L-5
Proposed Project Wastewater Generation

Land Use	Size	Generation Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	160 gallons/unit/day	41,600
Multi-Purpose/Gym	1,400 sf	250 gallons/ 1,000 sf/day[a]	350
		Proposed Project Subtotal	***41,950***
Less Baseline Conditions			
Existing Retail	24,000 sf	80 gallons/1,000 sf/day	1,920
Previously-Approved Residential Building	134 units	160 gallons/unit/day	21,440
		Baseline Conditions Subtotal	***23,360***
		Net Increase in Wastewater Generation over Baseline	**18,590**

[a] *Calculated utilizing the "Gymnasium" generation rate.*

Source: Brent Lorscheider, Acting Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, City of Los Angeles Department of Public Works, September 15, 2008.

Source (table): Christopher A. Joseph & Associates, February 2009.

No sewer infrastructure deficiencies are known to occur in the project vicinity. During the project's construction phase, the project applicant would be required to coordinate with LABS to confirm sewer capacity availability and would be required to implement any upgrades that would be needed.[32] Through this process, impacts related to wastewater conveyance infrastructure would be less than significant.

Wastewater generated on the project site would be subsequently conveyed to HTP, which has a remaining treatment capacity of approximately 88 million gpd. The 18,590 gpd net increase in wastewater over the existing uses represents approximately 0.02 percent of the remaining capacity at HTP. Therefore, HTP has enough remaining capacity to accommodate the Proposed Project. Impacts to wastewater treatment capacity as a result of the buildout of the Proposed Project would be less than significant.

CUMULATIVE IMPACTS

Implementation of the Proposed Project in combination with the related projects identified in Section II, Environmental Setting, would increase the demand for wastewater services provided by LABS. As shown in Table IV.L-6, Cumulative Wastewater Generation, the related projects within the City of Los Angeles, Culver City, and Marina Del Rey would generate an estimated 1,385,225 gpd of wastewater.

[32] *Letter correspondence with Brent Lorscheider, Acting Division Manager, Wastewater Engineering Services Division, City of Los Angeles Bureau of Sanitation, September 15, 2008.*

Table IV.L-6
Cumulative Wastewater Generation

Map No.	Location (Address)	Size	Unit	Description	Generation Rate	Total (gallons/day)
1	SWC Lincoln Blvd./Manchester Ave.	Playa del Oro/Furama Redevelopment				
		539	du	Apartment	160 gallons/du/day	86,240
		27,000	sf	Retail	80 gallons/1,000 sf/day	2,160
		(500)	rm	Hotel (to be removed)	130 gallons/room/day	(65,000)
		(10,420)	sf	Retail (to be removed)	80 gallons/1,000 sf/day	(834)
		(10,590)	sf	Office (to be removed)	150 gallons/1,000 sf/day	(1,589)
		(4,800)	sf	High-Turnover Restaurant (to be removed)	20 gallons/seat/day	(3,500)[i]
2	7215 W. Manchester Ave.[a]	4,850	sf	Walk-In Bank	80 gallons/1,000 sf/day	388
3	6225 W. Century Blvd.	180	du	Hotel	130 gallons/room/day	23,400
4	7900 S. Loyola Blvd.	16	st	Daycare Center	8 gallons/st/day	128
5	7831 Sepulveda Blvd.	600	st	School Expansion	8 gallons/st/day	4,800
6	5401 Beethoven St.	420	st	Private School	8 gallons/st/day	3,360
7	8632 Sepulveda Blvd.	3,621	sf	Walk-In Bank	80 gallons/1,000 sf/day	290
8	5550 Grosvenor Blvd.	208	du	Condominium	160 gallons/du/day	33,280
9	4500 Via Marina[j]	120	du	Apartment (expansion)	160 gallons/du/day	19,200
10	Southern terminus of Fiji Wy. (Parcel 64)[b, j]	478	du	Multi-Family Residential	160 gallons/du/day	76,480
		500	sf	Restaurant	300 gallons/1,000 sf/day	150
		34	slip	Boat	n/a[k]	-
		(224)	du	Apartment (to be removed)	160 gallons/du/day	(35,840)
11	W/o Fiji Wy. Near Terminus Fisherman's Village[c, j] (Parcels 55/56/W)	132	rm	Hotel	130 gallons/room/day	17,160
		1,230	seat	Restaurant	30 gallons/seat/day	36,900
		24,250	sf	Retail	80 gallons/1,000 sf/day	1,940
		5,200	sf	Office	150 gallons/1,000 sf/day	780
		26	slip	Boat	n/a[k]	-
		(12,984)	sf	Retail/Commercial (to be removed)	80 gallons/1,000 sf/day	(1,039)
		(16,149)	sf	Restaurant (to be removed)	30 gallons/seat/day	(18,000)[h]
		(17)	slip	Boat (to be removed)	n/a[k]	-
12	W/o Lincoln Blvd., N/o Fiji Wy. (Parcels 50&83)[j]	4,700	sf	Specialty Retail	80 gallons/1,000 sf/day	376

Table IV.L-6 (Continued)
Cumulative Wastewater Generation

Map No.	Location (Address)	Size	Unit	Description	Generation Rate	Total (gallons/day)
13	12700 Braddock Dr.	134,557	sf	Warehouse	20 gallons/1,000 sf/day	2,691
		1,357	sf	Office	150 gallons/1,000 sf/day	204
		(58,323)	sf	University of CA Laundry Building (to be removed)	80 gallons/1,000 sf/day	(4,666)
14	S/o Jefferson Blvd., E/o Lincoln Blvd.	Playa Vista Phase I				
		3,246	du	Condominium	160 gallons/du/day	519,360
		2,142,050	sf	Office	150 gallons/1,000 sf/day	321,308
		25,000	sf	Retail	80 gallons/1,000 sf/day	2,000
		1,129,900	sf	Production & Staging Support	80 gallons/1,000 sf/day	90,392
		65,000	sf	Community Serving Uses	80 gallons/1,000 sf/day	5,200
		(2,166)	du	Condominium	160 gallons/du/day	(346,560)
		(221,000)	sf	Office	150 gallons/1,000 sf/day	(33,150)
		(12,500)	sf	Retail	80 gallons/1,000 sf/day	(1,000)
15	S/o Jefferson Blvd./ Westlawn Ave.[d]	Playa Vista Phase II				
		175,000	sf	Office	150 gallons/1,000 sf/day	26,250
		2,600	du	Apartment	160 gallons/du/day	416,000
		150,000	sf	Shopping Center	80 gallons/1,000 sf/day	12,000
		40,000	sf	Community Serving Uses	80 gallons/1,000 sf/day	3,200
16	N/s Fiji Wy., w/o Admiralty Wy. (Parcel 52/GG)[j]	345	Vessel	Dry Stack Storage Facility	n/a[k]	-
		30	Vessel	Mast Up Storage Space	n/a[k]	-
		1,500	sf	Sheriff Boatwright Facility	150 gallons/1,000 sf/day	225
17	1 LMU Dr.[e]	7,800	st	Loyola Marymount University Master Plan	18 gallon/st/day	140,400
18	6161 W Centinela Ave.[f]	Carlyle Radisson				
		342,409	sf	Office	150 gallons/1,000 sf/day	51,361
19	9204 Airport Blvd.[g]	Airport Blvd Carwash				
		15,380[l]	sf	Car Wash	(Avg. Process Flow)[m]	-
		(15,251)	sf	Car Rental Facility (to be removed)	80 gallons/1,000 sf/day	(1,220)
					Related Projects Total	**1,385,225**
					Proposed Project Net Total	**18,590**
					Cumulative Total	**1,403,815**

[a] *Traffic impact study for Bank of America project at Lincoln Boulevard/Manchester Ave., Crain & Associates, June 2008.*
[b] *Traffic analysis for a Proposed 478-unit Residential Development on Parcel 64 in Marina del Rey, Crain & Associates, January 2007.*
[c] *Traffic study for the Fisherman's Village Retail and Commercial Development Project, Hirsch Green Traffic Consultant, March 2007.*
[d] *Traffic analysis for the Village at Playa Vista Project, Kaku Associates, Inc. and Raju Associates, Inc., July 2003.*
[e] *No net increase of number of students or expansion of campus square footage. Therefore, no net increase trip generation*

Table IV.L-6 (Continued)
Cumulative Wastewater Generation

Map No.	Location (Address)	Size	Unit	Description	Generation Rate	Total (gallons/day)
for the project.						
f	*Traffic Impact Study Report for Proposed Entrada Office Project at 6161 W. Centinela Avenue, Culver City, Crain & Associates, November 16, 2007. Added as part of the analysis as a worst case scenario.*					
g	*Memorandum of Understanding (MOU) for the 9204 Airport Boulevard Carwash Project, Crain & Associates, March 19, 2008.*					
h	*Estimated as 600 seats.*					
i	*Estimated as 175 seats.*					
j	*Located in Marina Del Rey and added as part of the analysis as a worst case scenario.*					
k	*Uses not anticipated to generate wastewater, therefore no generation rate was used.*					
l	*Based on telephone communication with Helen Shi at Crain & Associates, July 1, 2008.*					
m	*The Bureau of Sanitation does not have a standard average process flow for car washes, instead process flows are provided by the developer and are unique to each car wash. Therefore, no rate is available to calculate wastewater generation.*					
Source: Crain & Associates, Traffic Impact Study for Residential Project at Lincoln Boulevard/Manchester Avenue (8601 Lincoln Boulevard), City of Los Angeles, June 23, 2008, p. 27-29.						

The LABS would provide sewer conveyance for the identified related projects, although it does not provide the current flow levels and remaining capacities in the sewer lines serving the related projects. However, each of the related projects would need to obtain a final approval from the LABS for a sewer capacity connection permit. The sewer line capacity for each related project would be evaluated on a case-by-case basis, and any upgrades that could be needed would be implemented prior to issuance of any occupancy permits. Therefore, cumulative impacts to wastewater conveyance infrastructure would be less than significant.

It is assumed that all of the related projects would rely on the wastewater treatment services provided by the HTP. As shown in Table IV.L-6, Cumulative Wastewater Generation, the estimated wastewater generated by the related projects in combination with the Proposed Project would be 1,403,815 gpd. As previously discussed, the design capacity of HTP is 450 million gallons per day and HTP's current average wastewater flow is 362 million gpd. Therefore, the HTP has a remaining capacity of approximately 88 million gpd. The cumulative sewage generation would be within the design capacity of HTP representing about 1.6 percent of the remaining capacity. Cumulative impacts to wastewater treatment capacity would be less than significant.

MITIGATION MEASURES

Because no significant impacts related to sewer service were identified, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to sewer service would be less than significant.

ENVIRONMENTAL SETTING

Solid Waste Collection and Disposal

Within the City of Los Angeles, various public agencies and private companies administer solid waste management, including collection and disposal services and landfill operation. Refuse from single-family residential and limited multi-family residential uses on public streets is collected by the Los Angeles Bureau of Sanitation (LABS) and disposed of at City operated landfills. Private contractors collect waste generated by the majority of multi-family residential sources and all commercial and industrial sources. Private contractors also collect construction waste. Private contractors can dispose of waste at a City operated landfill or a landfill of their choosing.

Currently, the retail use on the project site generates an estimated 120 pounds of solid waste per day (see Table IV.L-7).

Table IV.L-7
Existing Uses Solid Waste Generation

Land Use	Size	Generation Rate	Total (pounds/day)
Retail	24,000 sf	5 pounds/1,000 sf/day	120
		Total	**120**

sf = square feet
Source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.

Landfills

Waste disposal sites (i.e., landfills) are operated by the City and County of Los Angeles as well as by private companies. In addition, transfer stations are utilized to temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or wasteshed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region). Most commonly, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill service the City of Los Angeles. Both landfills accept residential, commercial, and construction waste.

Sunshine Canyon Landfill

The Sunshine Canyon Landfill is owned and operated by Browning-Ferris Industries, who purchased the landfill from the City in 1978. In 1991, the operating permit for the landfill expired and operations ceased. The County Board of Supervisors issued a Conditional Use Permit in 1993 to allow continued operation at the Landfill on the County portion of the site. As one of the conditions of the permit, Browning-Ferris Industries had to obtain a City of Los Angeles approval to operate in the City half of the landfill, thereby establishing a City/County landfill. In 1996, landfill operations on the County side of the landfill resumed with an approximate 6,600 tons per day capacity with an expected 10-year life span. In 1999, the Los Angeles City Council approved Ordinance 172,933, a zone change and General Plan amendment, allowing for the continued use on the City portion of the landfill along with a Subsequent Environmental Impact Report to assess the combined landfill operations.[33] The plan approved pursuant to Ordinance 172,933 allows the City to: (1) work with the County to combine the City and County portions of the landfill;[34] (2) expand the landfill footprint to 194 acres in the City and 257 acres in the County; (3) increase capacity to 55 million tons in the City portion and increase the combined capacity of the City/County landfill to 90 million tons; (4) permit a daily maximum intake of 5,500 tons per day prior to the combining of the City and County portions of the landfill; (5) permit a combined City/County daily maximum intake of 11,000 tons following combining the City and County portions of the landfill;[30] and (6) extend the estimated closure date to approximately 2029.[35] According to a permit issued on July 7, 2008, as of October 31, 2007, Sunshine Canyon Landfill had approximately 111,200,000 cubic yards of remaining capacity and a maximum permitted daily intake of 12,100 tons/day.[36]

Chiquita Canyon Landfill

The Chiquita Canyon Landfill has been owned and operated by Republic Services of California I, L.L.C., since 1999. As of May 1, 2003, the landfill has a remaining permitted capacity of approximately 35,800,000 cubic yards and a permitted maximum daily intake of 6,000 tons/day.[37] The landfill is comprised of approximately 592 acres, of which 257 are permitted for actual waste disposal. The remaining 335 acres are reserved for ponds, buffer zones, and potential future landfill expansions.

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[33] *Sunshine Canyon Landfill, About Sunshine Canyon Landfill, History, http://www.sunshinecanyonlandfill.com/about/history.shtml, .August 3, 2009.*

[34] *Sunshine Canyon Landfill, About Sunshine Canyon Landfill, History, http://www.sunshinecanyonlandfill.com/about/history.shtml, .August 3, 2009.*

[35] *City of Los Angeles, Draft Subsequent Environmental Impact Report Sunshine Canyon Landfill, SEIR 91-0377-ZC/GPA, State Clearinghouse No. 92041053, July 1997.*

[36] *State of California Integrated Waste Management Board, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), http://www.ciwmb.ca.gov/SWIS/19-AA-2000/Detail/, .August 3, 2009.*

[37] *State of California Integrated Waste Management Board, Enforcement, Solid Waste Information System, Facility/Site Search, http://www.ciwmb.ca.gov/SWIS/19-AA-0052/Detail/, .August 3, 2009.*

Recycling Facilities

Waste generated in the City may also be diverted from landfills and recycled. LABS, Solid Resources Citywide Recycling Division (SRCRD) develops and implements source reduction, recycling, and composting programs in the City.[38] SRCRD provides technical assistance to public and private recyclers, oversees the City's recycling program, manages the Household Hazardous Waste program, and helps create markets for recycled materials.[39] In order to provide more information to public and private sectors regarding construction waste diversion, SRCRD publishes the Construction and Recycling Guide, which is a directory of recyclers and certified mixed-debris processors that serve the Los Angeles region.[40] This guide, in addition to an alphabetical listing of companies, also provides listings by materials accepted at the respective facilities so that developers and contractors can tailor their recycling choices to suit their project needs. While some of the companies listed in the guide also recycle operational waste, the County of Los Angeles Department of Public Works maintains a list of all types of landfills and recycling facilities in the County.[41] The California Integrated Waste Management Board (CIWMB) provides additional facility details for recycling companies in the County.[42] While the final choice in recycling facilities rests with the project applicant, the nearest facility in the vicinity of the project site that could be utilized is the City of Santa Monica Transfer Station. This facility is located approximately five-and-one-quarter miles northwest of the project site at 2401 Delaware Avenue in the City of Santa Monica.

Household Hazardous Waste

The City operates a Household Hazardous Waste (HHW) program in cooperation with the County of Los Angeles Department of Public Works. The program is a way for private residents to safely dispose of household chemicals such as household cleaning products, paint substances, automotive products, pool chemicals, fertilizers, pesticides, batteries, and fluorescent light bulbs.[43] City and County residents can bring their HHW to "Hazmobile" collection sites. "Hazmobile" is an operation consisting of trailers and trucks with employees trained in hazardous waste handling. These sites move to different locations

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[38] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Recycling, Construction & Demolition Recycling Guide, http://www.lacity.org/san/solid_resources/pdfs/C&D_guide.pdf, April 1, 2008.*

[39] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Recycling, Construction & Demolition Recycling Guide, http://www.lacity.org/san/solid_resources/pdfs/C&D_guide.pdf, April 1, 2008.*

[40] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Recycling, Construction & Demolition Recycling Guide, http://www.lacity.org/san/solid_resources/pdfs/C&D_guide.pdf, April 1, 2008.*

[41] *County of Los Angeles, Department of Public Works, Services, Solid Waste Facilities in Los Angeles County, http://ladpw.org/swims/general/facilities/nearestfacilitylist.asp, April 1, 2008.*

[42] *County of Los Angeles, Department of Public Works, Services, Solid Waste Facilities in Los Angeles County, http://ladpw.org/swims/general/facilities/nearestfacilitylist.asp, April 1, 2008.*

[43] *Los Angeles City Bureau of Sanitation, Household Hazardous Waste Collection Program, http://www.lacity.org/san/solid_resources/special/services/hazmobil.htm, April 1, 2008.*

within the City, remaining at each site for approximately two or three days. These sites are staffed with employees trained in hazardous waste handling who safely unload resident's hazardous waste into trucks and trailers on-site.[44]

LABS has also established five permanent waste collection sites throughout the City known as S.A.F.E. (solvents/automotive/flammables/electronics) Centers, which are open every weekend to allow residents to conveniently dispose of their HHW. The S.A.F.E. Center nearest to the project site is the Playa del Rey: Hyperion Treatment Plant S.A.F.E. Center located approximately two miles to the southwest of the project site at 7660 West Imperial Highway, Gate B. This S.A.F.E. center accepts paints, solvents, automotive fluids and filters, anti-freeze, cleaning products, pool and garden chemicals, aerosol cans, all medicine, auto batteries, household (alkaline) batteries, fluorescent tubes and bulbs, thermostats, other mercury-containing lamps, and electronic devices.[45]

In addition, CIWMB has certified used motor oil collection centers throughout the State. These locations accept uncontaminated oil throughout the year. A list of the locations can be obtained from the Bureau of Sanitation or from CIWMB.[46]

Construction and Demolition Debris

The United States Environmental Protection Agency (USEPA) report, *Characterization of Building-Related Construction and Demolition Debris in the United States*, characterizes the quantity and composition of building-related construction and demolition debris generated in the United States, and summarizes the waste management practices for this waste stream.[47] The report also includes building-related construction and demolition debris generation rate estimates based on empirical data for new construction sites gathered by the National Association of Homebuilders (NAHB) Research Center; the Metropolitan Service District (METRO) in Portland, Oregon; Woodbin 2, a non-profit organization in Wake County, North Carolina; McHenry County, Illinois; and Cornell University. The following information is based on this USEPA report.

The California State definition of construction and demolition debris includes concrete, asphalt paving and roofing, lumber, gypsum board, rock, soil, fines, and many miscellaneous and composite materials generated by demolition and new construction of structures that contain materials that cannot be put in

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[44] *Los Angeles City Bureau of Sanitation, Household Hazardous Waste Collection Program, http://www.lacity.org/san/solid_resources/special/services/hazmobil.htm, April 1, 2008.*

[45] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Special Materials: Hazardous Waste, S.A.F.E. Centers: Permanent Collection Centers, Playa del Rey: Hyperion Treatment Plant, http://www.lacity.org/san/solid_resources/pdfs/safe-htp-flyer_english.pdf, April 1, 2008.*

[46] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Special Materials: Hazardous Waste, Used Oil Recycling Program, Recycling Facility Locator, http://routemap.lacity.org/oil/oil.htm, April 1, 2008.*

[47] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998, http://www.epa.gov/epaoswer/hazwaste/sqg/c&d-rpt.pdf, April 1, 2008.*

any other type or subtype.[48] There is typically less concrete in construction debris than demolition debris, although some construction projects produce considerable quantities of concrete, depending on the technology used to build the concrete walls. Scrap from residential construction sites typically represents between six and eight percent of the total weight of the building materials delivered to the site, excluding the foundation, concrete floors, driveways, patios, etc. There is typically little waste concrete to dispose of from residential construction projects. When buildings are demolished, large quantities of waste may be produced in a relatively short period of time, depending on the demolition technique used. The demolition project duration can vary depending on the technique used (i.e., implosion with explosives, use of crane and wrecking ball, or deconstruction of structures). In actual practice, the majority of demolition projects use a combination of the last two basic techniques, depending on the materials used in the original project, the physical size of the structure, the surrounding buildings that cannot be disturbed or impacted, and the time allocated for the project. One hundred percent of the weight of a building, including the concrete foundations, driveways, patios, etc., may be generated as construction and demolition debris when a building is demolished. On a per building basis, demolition waste quantities may be 20 to 30 times as much as construction debris.

Regulatory Framework

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, the Act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. The Act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 by the year 2000. The City of Los Angeles surpassed the State-mandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate.[49] In 2001 and 2002, the City achieved a diversion rate of 63 and 62 percent, respectively.[50] In addition, in 1999, the Mayor directed City departments to develop strategies to achieve the citywide recycling goal of 70 percent by 2015.[51]

AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the goals. SRRE contains

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[48] *California Integrated Waste Management Board, Publications, CIWMB Publications Catalog, Statewide Waste Characterization Study 2004, http://www.ciwmb.ca.gov/Publications/default.asp?pubid=1097, September 2, 2008.*

[49] *City of Los Angeles, AB 939 2000 Report, August 2001, page ES-1.*

[50] *California Integrated Waste Management Board, Jurisdiction Profile for City of Los Angeles, http://www.ciwmb.ca.gov/Profiles/Juris/JurProfile2.asp?RG=C&JURID=272&JUR=Los+Angeles, April 1, 2008.*

[51] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Solid Resources, Facts & Figures, http://www.lacity.org/san/solid_resources/factsfigures.htm, April 1, 2008.*

programs and policies for fulfillment of the goals of the Act, including the above-noted diversion goals and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to CIWMB to update it on their progress toward the AB 939 goals (i.e., source reduction, recycling and composting, and environmentally safe land disposal).[52] To date, implementation of AB 939 has proven to be a successful method of reducing landfill waste in the City. Furthermore, the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) provides additional goals, objectives, and policies for solid waste management in the City. The Framework Element of the City of Los Angeles General Plan also supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[53] In its efforts to reach AB 939 goals and conform to the Framework Element, LABS prepared the *Solid Resources Infrastructure Strategy Facilities Plan* in 2000 with the specific objectives to develop transfer facilities and/or recycling centers; relocate the East Valley Collection Yard and develop a new East Valley collection yard facility; develop permanent year-round Household Hazardous Waste (HHW) drop-off facilities for City residents; continue to pursue development of yard trimmings processing, mulching, and shipping facilities; and continue to research and develop the use of Material Recovery Facilities to preprocess all residual waste prior to delivery to a disposal site.[54] Furthermore, this plan seeks to establish a capital improvement expenditure program to upgrade all collection yard facilities to meet current environmental, health, and safety standards with assistance from the Office of Administrative and Research Services; perform closure construction at all six inactive City-owned landfill sites; acquire minimal long-term disposal capacity; identify methods of receiving citywide public review of plans and actions in the Solid Resources program; and develop a comprehensive and continual Public Education and Community Outreach program designed to educate and inform the public.[55]

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to solid waste are determined based on the proposed increase in solid waste generation and the capacity of existing and proposed solid waste infrastructure. The existing landfill capacities and solid waste generation is compared to the Proposed Project's solid waste generation and future landfill capacities, including a discussion of recycling

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[52] *California Public Resources Code, §40050 et seq.*

[53] *City of Los Angeles, Department of City Planning, The Citywide General Plan Framework, 1996, page 9-11.*

[54] *City of Los Angeles Department of Public Works, Solid Resource Infrastructure Strategy Facilities Plan, http://www.lacity.org/san/isfp/isfp.pdf, September 2, 2008.*

[55] *City of Los Angeles Department of Public Works, Solid Resource Infrastructure Strategy Facilities Plan, http://www.lacity.org/san/isfp/isfp.pdf, September 2, 2008.*

programs and design features that would be implemented with the Proposed Project. Estimates of the Proposed Project's solid waste generation were calculated based on generation rates provided in the City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.

Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Proposed Project would have a potentially significant solid waste impact if it were to:

(a) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs; or

(b) Not comply with federal, State, and local statutes and regulations related to solid waste.

Furthermore, as set forth in *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;

(b) Need for additional waste collection route, or recycling or disposal facility to adequately handle project-generated waste; or

(c) Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in volume 4 of the SRRE.

Project Impacts

The western portion of the approximately 3.03-acre project site is currently developed with three commercial structures that include 24,000 square feet of retail uses and associated surface parking lots.

Solid waste would be generated at the project site by both short-term construction activities and long-term operation of the proposed land uses. The solid waste collection and disposal needs during construction and operation of the Proposed Project would be met by private contractors, as LABS only collects waste from single-family and limited multi-family uses on public streets.

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, in a four- to six-story building above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved,

vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

Construction Impacts

Construction waste would be generated during demolition and construction activities. While site grading would occur at the project site and would require soil export, the primary types of demolition/construction debris that would be removed from the project site would include cement, asphalt, lumber, metal, masonry materials, and dirt and plant materials. Dirt and plant material would be used at the local landfills to meet daily coverage requirements. The exported soil would not be disposed of in a landfill. All "clean" soil, soil that is free of contaminants, is typically exported to other construction sites that need soil. Soil that has been contaminated is removed from the site and taken to a hazard dump site to be decontaminated. Only demolition and construction waste would be disposed of at a landfill. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials, which would generate approximately 47,976 tons of demolition/construction debris for the project (see Table IV.L-8, Approximate Project Demolition and Construction Waste Generation). Based on information provided previously in this section, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill have a combined remaining capacity of 147,000,000 tons. In accordance with historic recycling trends in the City and the incentives for recycling, most of the demolition/construction debris associated with the project likely would be recycled. However, conservatively assuming that none of the demolition/construction debris is recycled, the existing remaining landfill capacity would be adequate to accommodate the project. Therefore, project impacts related to landfill capacity as a result of demolition/construction would be less than significant.

Table IV.L-8
Approximate Project Demolition and Construction Waste Generation

Existing Land Use	Size (sf)	Generation Rate (tons/sf)[a]	Total (tons)
DEMOLITION			
Structures and parking area	63,162 sf	0.75	47,372
CONSTRUCTION			
Non-Residential	266,456	0.000973	259
Residential	157,604[b]	0.00219	345
		Total Construction Debris	604
		Total Demolition/Construction Debris	**47,976**

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.*
[b] *Assumes parking and recreation and common areas.*

Operational Impacts

Operation of the Proposed Project would result in ongoing generation of solid waste. Over the long-term, the Proposed Project would be expected to generate a net increase of approximately 384 pounds of solid waste per day (ppd), or 0.19 tons of solid waste, over the baseline conditions (see Table IV.L-9, Proposed Project Solid Waste Generation).

Table IV.L-9
Proposed Project Solid Waste Generation

Land Use	Size	Generation Rate	Total (pounds/day)
Proposed Project			
Residential/Live/Work Units	260 units	4 pounds/unit/day	1,040
		Proposed Project Subtotal	***1,040***
Less Baseline Conditions			
Existing Retail	24,000 sf	5 pounds/1,000 sf/day	120
Previously-Approved Residential Building	134 units	4 pounds/unit/day	536
		Baseline Conditions Subtotal	***656***
		Net Increase in Solid Waste Generation over Baseline	**384**

[a] *City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.*
Source (table): Christopher A. Joseph & Associates, February 2009.

Sunshine Canyon and Chiquita Canyon Landfills are currently permitted to accept 12,100 tons/day and 6,000 tons/day, respectively.[56] In total, the two landfills may accept up to 18,100 tons/day. At present, Sunshine Canyon Landfill accepts approximately 2,360 tons/day at the Citywide landfill. Therefore, Sunshine Canyon Landfill can accept an additional 9,740 tons net increase in solid waste per day at the Citywide landfill. Chiquita Canyon Landfill accepts an average of 5,500 tons/day, and therefore, can accept an additional 500 tons/day net increase in solid waste.[57] Solid waste disposal has remained comparatively consistent since 1990 despite population and economic growth.[58] As mentioned, the Proposed Project would generate a net increase in solid waste generation of approximately 384 ppd, or 0.19 tons per day. This net increase in solid waste represents approximately 0.002 percent of the remaining daily intake capacity, and approximately 0.002 percent of the total permitted daily intake at Sunshine Canyon Landfill. At Chiquita Canyon Landfill, this generation rate represents approximately

[56] *State of California Integrated Waste Management Board, Enforcement, Solid Waste Information System, http://www.ciwmb.ca.gov/SWIS/, September 2, 2008.*

[57] *Chiquita Canyon Landfill, FAQ, website: http://www.chiquitacanyon.com/faq.php, February 4, 2010.*

[58] *Los Angeles County Department of Public Works, "Solid Waste Management in Los Angeles County," May 10, 2007, Disposal System Overview, Remaining Permitted Capacity for In-County Landfills (as of January 1, 2007), http://ladpw.org/swims/Upload/SWM%20in%20LA%20County_7250.pdf, June 25, 2008.*

0.04 percent of the remaining daily intake capacity, and approximately 0.003 percent of the total permitted daily intake.

Furthermore, operations within the City and the project site would continue to be subject to the requirements set forth in AB 939 requiring each city or county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The increase in solid waste generated by the Proposed Project would not result in the need for additional waste collection routes and recycling or disposal facilities. Therefore, impacts associated with solid waste service would be less than significant.

CUMULATIVE IMPACTS

As shown in Table IV.L-10, Cumulative Solid Waste Generation, the related projects within the City of Los Angeles, Culver City, and Marina Del Rey would generate an estimated 10,736 ppd of solid waste.

As shown in Table IV.L-9, the Proposed Project would generate a net total of 384 ppd. The solid waste generation of the Proposed Project in combination with the identified related projects would be approximately 11,120 ppd or approximately 5.6 tons per day (see Table IV.L-10).

Table IV.L-10
Cumulative Solid Waste Generation

Map No.	Location (Address)	Size	Unit	Description	Generation Rate	Total (pounds/day)
1	SWC Lincoln Blvd./Manchester Ave.	Playa del Oro/Furama Redevelopment				
		539	du	Apartment	4 lbs/du/day	2,156
		27,000	sf	Retail	5 lbs/1,000 sf/day	135
		(500)	rm	Hotel (to be removed)	2 lbs/room/day	(1,000)
		(10,420)	sf	Retail (to be removed)	5 lbs/1,000 sf/day	(52)
		(10,590)	sf	Office (to be removed)	6 lbs/1,000 sf/day	(64)
		(4,800)	sf	High-Turnover Restaurant (to be removed)	5 lbs/1,000 sf/day	(24)
2	7215 W. Manchester Ave.[a]	4,850	sf	Walk-In Bank	5 lbs/1,000 sf/day	24
3	6225 W. Century Blvd.	180	du	Hotel	2 lbs/room/day	360
4	7900 S. Loyola Blvd.	16	st	Daycare Center	0.007 lbs/st/day	1
5	7831 Sepulveda Blvd.	600	st	School Expansion	0.007 lbs/st/day	4
6	5401 Beethoven St.	420	st	Private School	0.007 lbs/st/day	3
7	8632 Sepulveda Blvd.	3,621	sf	Walk-In Bank	5 lbs/1,000 sf/day	18
8	5550 Grosvenor Blvd.	208	du	Condominium	4 lbs/du/day	832
9	4500 Via Marina[h]	120	du	Apartment (expansion)	4 lbs/du/day	480

Table IV.L-10 (Continued)
Cumulative Solid Waste Generation

Map No.	Location (Address)	Size	Unit	Description	Generation Rate	Total (pounds/day)
10	Southern terminus of Fiji Wy. (Parcel 64)[b, h]	478	du	Multi-Family Residential	4 lbs/du/day	1,912
		500	sf	Restaurant	5 lbs/1,000 sf/day	3
		34	slip	Boat	n/a[i]	-
		(224)	du	Apartment (to be removed)	4 lbs/du/day	(896)
11	W/o Fiji Wy. Near Terminus Fisherman's Village[c, h] (Parcels 55/56/W)	132	rm	Hotel	2 lbs/room/day	264
		1,230	seat	Restaurant	5 lbs/1,000 sf/day	162[j]
		24,250	sf	Retail	5 lbs/1,000 sf/day	121
		5,200	sf	Office	6 lbs/1,000 sf/day	31
		26	slip	Boat	n/a[i]	-
		(12,984)	sf	Retail/Commercial (to be removed)	5 lbs/1,000 sf/day	(65)
		(16,149)	sf	Restaurant (to be removed)	5 lbs/1,000 sf/day	(81)
		(17)	slip	Boat (to be removed)	n/a[i]	-
12	W/o Lincoln Blvd., N/o Fiji Wy. (Parcels 50&83)[h]	4,700	sf	Specialty Retail	5 lbs/1,000 sf/day	24
13	12700 Braddock Dr.	134,557	sf	Warehouse	5 lbs/1,000 sf/day	673
		1,357	sf	Office	6 lbs/1,000 sf/day	8
		(58,323)	sf	University of CA Laundry Building (to be removed)	n/a[i]	-
14	S/o Jefferson Blvd., E/o Lincoln Blvd.	Playa Vista Phase I				
		3,246	du	Condominium	4 lbs/du/day	12,984
		2,142,050	sf	Office	6 lbs/1,000 sf/day	12,852
		25,000	sf	Retail	5 lbs/1,000 sf/day	125
		1,129,900	sf	Production & Staging Support	6 lbs/1,000 sf/day	6,779
		65,000	sf	Community Serving Uses	5 lbs/1,000 sf/day	325
		(2,166)	du	Condominium	4 lbs/du/day	(8,664)
		(221,000)	sf	Office	6 lbs/1,000 sf/day	(33,150)
		(12,500)	sf	Retail	5 lbs/1,000 sf/day	(63)
15	S/o Jefferson Blvd./ Westlawn Ave.[d]	Playa Vista Phase II				
		175,000	sf	Office	6 lbs/1,000 sf/day	1,050
		2,600	du	Apartment	4 lbs/du/day	10,400
		150,000	sf	Shopping Center	5 lbs/1,000 sf/day	750
		40,000	sf	Community Serving Uses	5 lbs/1,000 sf/day	200

Table IV.L-10 (Continued)
Cumulative Solid Waste Generation

Map No.	Location (Address)	Size	Unit	Description	Generation Rate	Total (pounds/day)
16	N/s Fiji Wy., w/o Admiralty Wy. (Parcel 52/GG)[h]	345	Vessel	Dry Stack Storage Facility	n/a[i]	-
		30	Vessel	Mast Up Storage Space	n/a[i]	-
		1,500	sf	Sheriff Boatwright Facility	6 lbs/1,000 sf/day	9
17	1 LMU Dr.[e]	7,800	st	Loyola Marymount University Master Plan	0.007 lbs/st/day	55
18	6161 W Centinela Ave.[f]	Carlyle Radisson				
		342,409	sf	Office	6 lbs/1,000 sf/day	2,054
19	9204 Airport Blvd.[g]	Airport Blvd Carwash				
		15,380[k]	sf	Car Wash	5 lbs/1,000 sf/day	77
		(15,251)	sf	Car Rental Facility (to be removed)	5 lbs/1,000 sf/day	(76)
					Related Projects Total	**10,736**
					Proposed Project Net Total	**384**
					Cumulative Total	**11,120**

[a] *Traffic impact study for Bank of America project at Lincoln Boulevard/Manchester Ave., Crain & Associates, June 2008.*
[b] *Traffic analysis for a Proposed 478-unit Residential Development on Parcel 64 in Marina del Rey, Crain & Associates, January 2007.*
[c] *Traffic study for the Fisherman's Village Retail and Commercial Development Project, Hirsch Green Traffic Consultant, March 2007.*
[d] *Traffic analysis for the Village at Playa Vista Project, Kaku Associates, Inc. and Raju Associates, Inc., July 2003.*
[e] *No net increase of number of students or expansion of campus square footage. Therefore, no net increase trip generation for the project.*
[f] *Traffic Impact Study Report for Proposed Entrada Office Project at 6161 W. Centinela Avenue, Culver City, Crain & Associates, November 16, 2007. Added to the analysis as a worst case scenario.*
[g] *Memorandum of Understanding (MOU) for the 9204 Airport Boulevard Carwash Project, Crain & Associates, March 19, 2008.*
[h] *Located in Marina Del Rey and added to the analysis as a worst case scenario.*
[i] *Uses not anticipated to generate solid waste, therefore no generation rate was used.*
[j] *Estimated as 32,300 sf.*
[k] *Based on telephone communication with Helen Shi at Crain & Associates, July 1, 2008.*
Source: Crain & Associates, Traffic Impact Study for Residential Project at Lincoln Boulevard/Manchester Avenue (8601 Lincoln Boulevard), City of Los Angeles, June 23, 2008, p. 27-29.

Similar to the Proposed Project, the related projects would participate in regional source reduction and recycling programs pursuant to AB 939 further reducing the amount of solid waste to be disposed of at the landfills described above. Each related project would have the option of choosing its own recycling facility from the over 55 facilities listed by the LABS, County Department of Public works, and CIWMB. Therefore, per AB 939, the Proposed Project and the related projects would generate approximately 5,560 pounds, or 2.8 tons of solid waste per day, that would be disposed of in landfills.

As noted previously, Sunshine Canyon Landfill accepts approximately 2,360 tons/day at the Citywide landfill.[59] Therefore, Sunshine Canyon can accept up to an additional 9,740 tons of solid waste per day at its Citywide landfill. The Chiquita Canyon Landfill accepts an average of 5,500 tons/day, and can accept an additional 500 tons/day net increase in solid waste.[60] Solid waste disposal has remained comparatively regular since 1990 despite population and economic growth.[61] The Proposed Project in conjunction with the related projects would cumulatively generate approximately 11,120 ppd, or 5.6 tons per day after source reduction. This net increase in solid waste represents approximately 0.06 percent of the remaining daily intake capacity at the Sunshine Canyon Landfill, and approximately 1.1 percent of the remaining capacity at the Chiquita Canyon Landfill. The cumulative increase in solid waste generated by the Proposed Project and the related projects would not result in the need for additional disposal facilities. Therefore, cumulative impacts associated with solid waste service would be less than significant.

MITIGATION MEASURES

Because no significant impacts related to solid waste services have been identified, no mitigation measures are required. However, the City requires implementation of the following standard measures to minimize impacts:

L-11. In compliance with City Ordinance 171,687, the construction contractor will provide space for recycling containers.

L-12. In compliance with AB 939, the construction contractor shall only contract for waste disposal services with a company that recycles construction-related wastes.

L-13. In compliance with AB 939, to facilitate the on-site separation and recycling of construction-related wastes, the construction contractor shall provide temporary waste separation bins on-site during construction.

L-14. All waste shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood and vegetation. Non-recyclable materials/wastes must be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to solid waste resources would be less than significant.

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[59] *Sunshine Canyon Landfill, Update from Project Director, Thoughts from Dave Hauser, Project Director, Tuesday, April 1, 2008, http://www.sunshinecanyonlandfill.com/update/_index.htm, June 24, 2008.*

[60] *Chiquita Canyon Landfill, FAQ, website: http://www.chiquitacanyon.com/faq.php, February 4, 2010.*

[61] *Los Angeles County Department of Public Works, "Solid Waste Management in Los Angeles County," May 10, 2007, Disposal System Overview, Remaining Permitted Capacity for In-County Landfills (as of January 1, 2007), http://ladpw.org/swims/Upload/SWM%20in%20LA%20County_7250.pdf, June 25, 2008.*

ENVIRONMENTAL SETTING

Electricity Supplies

The Los Angeles Department of Water and Power (LADWP) provides electricity service to the City of Los Angeles. LADWP provides electricity service to approximately 4 million people and its service area covers roughly 465 square miles encompassing Los Angeles and many areas of the Owens Valley.[62] LADWP obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources (solar and wind) to generate power. Current installed generation capacity is approximately 7,331 mega-watts (MW) of power.[63] LADWP obtains power for the City of Los Angeles from the following sources: four municipally owned power plants within the Los Angeles Basin, LADWP Hydro-Generators in the Los Angeles Aqueduct, shared-ownership generating facilities in the Southwest, and purchased power from the Southwest and Pacific Northwest.

At present, the existing uses on the project site consume an estimated 888 kilowatt-hours (KW-Hours) of electricity per day (see Table IV.L-11).

Table IV.L-11
Existing Uses Electricity Consumption

Land Use	Size	Consumption Rate	Total (KW-Hours/day)
Retail	24,000 sf	37 KW-Hours/1,000 sf/day	888
		Total	**888**

sf = square feet
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.

Basin Power Generation

LADWP generates electricity in the Los Angeles Basin at four natural gas generation stations: Haynes Generating Station near Seal Beach, Scattergood Generation Station near Playa del Rey, Valley Generating Station in the San Fernando Valley, and Harbor Generating Station at Los Angeles Harbor. Based on recommendations from the 2000 Integrated Resources Plan (IRP), six peaking combustion

[62] *Los Angeles Department of Water and Power, 2007 Integrated Resource Plan Final, http://www.ladwp.com/ladwp/cms/ladwp010273.pdf, September 10, 2008.*

[63] *Los Angeles Department of Water and Power, 2007 Integrated Resource Plan Final, http://www.ladwp.com/ladwp/cms/ladwp010273.pdf, September 10, 2008.*

turbine units were installed in 2001. Additionally, six generating units in two generating plants were repowered and replaced with two combined cycle units.

Coal Power Generation

LADWP complements its natural gas generated power with power from coal generation plants at the Navajo and Intermountain generating stations.

Nuclear Power Generation

LADWP additionally obtains power for the City of Los Angeles with power purchases from the Palo Verde Nuclear Generation Station located approximately 50 miles west of Phoenix in Tonopah, Arizona. LADWP currently has a 10 percent interest in Palo Verde Nuclear Generation Station.

Hydro Power Generation

LADWP obtains power for the City of Los Angeles from renewable "small" hydro sources including: the Owens Gorge, the Owens Valley, and several Los Angeles Aqueduct hydroelectric plants. Other LADWP "large" hydroelectric generation locations include the Castaic Pumped Storage Power Plant and an entitlement of a portion of the power generated at Hoover Dam from the Hoover Power Plant.

Renewable Resources Power Generation

LADWP also obtains a small amount of power from the "small" hydro sources mentioned above, from energy generated at the Scattergood Generating Station utilizing digester gas obtained from the Hyperion Treatment Plant, energy generated at various Los Angeles Region landfills, and several solar photovoltaic sources also in the Los Angeles region. Approved by the State Legislature in 2002, SB 1078 requires municipally owned utilities to develop their own Renewables Energy Portfolio Standard (RPS) to increase the amount of energy supplied by renewable resources.[64] Subsequently, the State adopted an RPS of 20 percent renewable supply by 2010.[65] LADWP's RPS policy was implemented in 2005 and called for 20 percent of energy to be supplied by renewable sources by the year 2010, in compliance with SB 1078, and to increase the supply of renewable energy to 35 percent by the year 2020.[66]

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[64] *Los Angeles Department of Water and Power, Green LA, Renewable Energy Policy, website: http://www.ladwp.com/ladwp/cms/ladwp005864.jsp, February 4, 2010.*

[65] *Los Angeles Department of Water and Power, Green LA, Renewable Energy Policy, website: http://www.ladwp.com/ladwp/cms/ladwp005864.jsp, February 4, 2010.*

[66] *Los Angeles Department of Water and Power, Green LA, Renewable Energy Policy, website: http://www.ladwp.com/ladwp/cms/ladwp005864.jsp, February 4, 2010.*

Other Power Sources

LADWP also obtains extra power from purchases of excess power generated by self-generators interconnected with the Los Angeles Power Grid.

Electricity Distribution System

In total, LADWP operates 20 receiving stations and 174 distribution stations to provide electricity to its customers. The power supplied to LADWP customers is distributed through a network of approximately 3,643 miles of transmission lines, 8,685 miles of overhead distribution lines in Los Angeles area, 6,200 miles of underground distribution lines in Los Angeles area, and approximately 290,000 power poles.[67]

LADWP owns and operates an extensive network of Alternating Current (AC) and Direct Current (DC) transmission lines. Its internal grid is made up of a network of 115 kilovolt (kV), 138 kV, and 230 kV overhead and underground AC transmission lines.[68]

Regulatory Framework

Title 24 of the California Code of Regulations

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of California Code of Regulations (CCR). The efficiency standards apply to new construction of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided that these standards meet or exceed those provided in the Title 24 guidelines.

Western Electricity Coordinating Council (WECC) and the North American Electric Reliability Council (NERC)

WECC is responsible for coordinating and promoting electricity reliability from Alberta and British Columbia to northern Baja California and the 14 western states in between.[69] While membership in WECC is voluntary, LADWP is a member. WECC has implemented Standard BAL-STD-002-0 to require reliable operation of the interconnected power system and provide adequate generating capacity at

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[67] *City of Los Angeles Department of Water and Power, About LADWP, Our Service and History, LADWP Quick Facts and Figures, http://ladwp.com/ladwp/cms/ladwp000509.jsp, September 9, 2008.*

[68] *City of Los Angeles Department of Water and Power, About LADWP, Our Service and History, LADWP Quick Facts and Figures, http://ladwp.com/ladwp/cms/ladwp000509.jsp, September 9, 2008.*

[69] *Western Electricity Coordinating Council, About WECC, http://www.wecc.biz/wrap.php?file=wrap/about.html, April 1, 2008.*

all times to account for varying demands and avoid loss of firm load following transmission or generation contingencies. Specifically, WECC Standard BAL-STD-002-0 requires:

- Supply requirements for load variations;
- Replacement of generating capacity and energy lost due to forced outages of generation or transmission equipment;
- Meeting on-demand obligations; and
- Replacement of energy lost due to curtailment of interruptible imports.

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to electricity are determined based on the proposed increase in electricity demand and the capacity of existing and proposed distribution infrastructure. Existing electricity demand is compared to the Proposed Project's electricity demand and electricity infrastructure capacity, including improvements and energy efficiency standards associated with the Proposed Project. Electricity consumption is estimated based on consumption rates provided by the SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.

Thresholds of Significance

The *State CEQA Guidelines* provides no specific thresholds for impacts associated with electricity consumption.

However, in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;

(b) Whether and when the needed infrastructure was anticipated by adopted plans; and

(c) The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Project Impacts

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, in a four- to six-story building above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro

development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

Currently, an estimated 888 KW-Hours of electricity per day are consumed on-site (see Table IV.L-11 above). As shown in Table IV.L-12, the Proposed Project would generate a net increase in electricity demand over the baseline conditions estimated at 1,055 KW-Hours.

Table IV.L-12
Proposed Project Electricity Consumption

Land Use	Size	Consumption Rate[a]	Total (KW-Hours/day)
Proposed Project			
Residential/Live/Work Units	260 units	15.42 KW-Hours/unit/day	4,009
		Proposed Project Subtotal	***4,009***
Less Baseline Conditions			
Existing Retail	24,000 sf	37 KW-Hours/1,000 sf/day	888
Previously-Approved Residential Building	134 units	15.42 KW-Hours/unit/day	2,066
		Baseline Conditions Subtotal	***2,954***
		Net Increase in Electricity Consumption over Baseline	**1,055**

[a] *SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.*
Source (table): Christopher A. Joseph & Associates, February 2009.

Electricity Supplies

Based on information presented in the Citywide General Plan Framework EIR (1995), LADWP anticipates it can support future growth within the City, in accordance with growth rates projected to the year 2010. Based on the existing land use designation and zoning for the project site, the site could be developed with 236 residential units, assuming no land use designation or zoning changes. As such, the density of the project and its energy consumption would only represent a marginal increase over what has been planned for the site. In addition, LADWP, being part of the western United States power grid, is required to meet certain operational, supply, and reliability criteria as established by WECC and NERC. These criteria establish, for one, certain reserve margin requirements that LADWP must meet to

accommodate any unforeseen contingencies.[70] Furthermore, energy conservation standards established by Title 24 of CCR would be incorporated into new buildings as part of the building permit process and thus reduce the amount of electricity consumed by the Proposed Project by addressing insulation, glazing, lighting, shading, and water and space heating systems. The Applicant would be required to incorporate the energy conservation measures (refer to measures L-15 through L-19) into the project design and operation. As such, impacts to electricity supplies would be less than significant.

Electricity Distribution System

LADWP undertakes expansion and/or modification of electricity distribution infrastructure and systems to serve future growth in the City of Los Angeles as required in the normal process of providing electrical service. During the project's construction phase, the project applicant would be required to coordinate with LADWP to determine connection requirements and any upgrades that are needed (if any) would be implemented at that time. As such, impacts to electricity distribution infrastructure would be less than significant.

CUMULATIVE IMPACTS

As shown in Table IV.L-13, Cumulative Electricity Consumption, related projects within the City of Los Angeles, Culver City, and Marina Del Rey would consume an estimated 201,718 KW-hours of electricity per day.

As shown in Table IV.L-12, the Proposed Project would generate a net increase in electricity demand estimated at 1,055 KW-Hours per day. The electricity consumption of the Proposed Project in combination with the related projects would be approximately 202,773 KW-Hours per day (see Table IV.L-12).

Development of the Project in combination with the some of the related projects and projected population growth in the greater Los Angeles area not captured within the related projects could create an increased demand for electricity supplied by DWP (refer to Table IV.K-13). All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24 of the CCR. Additionally, LADWP undertakes expansion or modification of electrical service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing electrical service. Any potential cumulative impacts related to electric power service would be addressed through this process. Therefore, cumulative impacts related to electricity supply and infrastructure would be less than significant.

[70] *Western Electricity Coordinating Council, About WECC, http://www.wecc.biz/wrap.php?file=wrap/about.html, April 1, 2008.*

Table IV.K-13
Cumulative Electricity Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (KW-Hours/day)
1	SWC Lincoln Blvd./Manchester Ave.	Playa del Oro/Furama Redevelopment				
		539	du	Apartment	15.4 KW-Hours/du/day	8,301
		27,000	sf	Retail	37.1 KW-Hours/1,000 sf/day	1,002
		(500)	rm	Hotel (to be removed)	27.3 KW-Hours/room/day	(8,190)[k]
		(10,420)	sf	Retail (to be removed)	37.1 KW-Hours/1,000 sf/day	(387)
		(10,590)	sf	Office (to be removed)	35.5 KW-Hours/1,000 sf/day	(376)
		(4,800)	sf	High-Turnover Restaurant (to be removed)	130 KW-Hours/1,000 sf/day	(624)
2	7215 W. Manchester Ave.[a]	4,850	sf	Walk-In Bank	35.5 KW-Hours/1,000 sf/day	172
3	6225 W. Century Blvd.	180	du	Hotel	27.3 KW-Hours/1,000 sf/day	2,948[k]
4	7900 S. Loyola Blvd.	16	st	Daycare Center	0.03 KW-Hours/st/day	1
5	7831 Sepulveda Blvd.	600	st	School Expansion	0.03 KW-Hours/st/day	18
6	5401 Beethoven St.	420	st	Private School	0.03 KW-Hours/st/day	13
7	8632 Sepulveda Blvd.	3,621	sf	Walk-In Bank	35.5 KW-Hours/1,000 sf/day	129
8	5550 Grosvenor Blvd.	208	du	Condominium	15.4 KW-Hours/du/day	3,203
9	4500 Via Marina[h]	120	du	Apartment (expansion)	15.4 KW-Hours/du/day	1,848
10	Southern terminus of Fiji Wy. (Parcel 64)[b, h]	478	du	Multi-Family Residential	15.4 KW-Hours/du/day	7,361
		500	sf	Restaurant	130 KW-Hours/1,000 sf/day	65
		34	slip	Boat	n/a[i]	-
		(224)	du	Apartment (to be removed)	15.4 KW-Hours/du/day	(3,450)
11	W/o Fiji Wy. Near Terminus Fisherman's Village[c, h] (Parcels 55/56/W)	132	rm	Hotel	27.3 KW-Hours/1,000 sf/day	2,162[k]
		1,230	seat	Restaurant	130 KW-Hours/1,000 sf/day	4,199[l]
		24,250	sf	Retail	37.1 KW-Hours/1,000 sf/day	900
		5,200	sf	Office	35.5 KW-Hours/1,000 sf/day	185
		26	slip	Boat	n/a[i]	-
		(12,984)	sf	Retail/Commercial (to be removed)	37.1 KW-Hours/1,000 sf/day	(482)
		(16,149)	sf	Restaurant (to be removed)	130 KW-Hours/1,000 sf/day	(2,099)
		(17)	slip	Boat (to be	n/a[i]	-

Table IV.L-13 (Continued)
Cumulative Electricity Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (KW-Hours/day)
				removed)		
12	W/o Lincoln Blvd., N/o Fiji Wy. (Parcels 50&83)[h]	4,700	sf	Specialty Retail	37.1 KW-Hours/1,000 sf/day	174
13	12700 Braddock Dr.	134,557	sf	Warehouse	11.9 KW-Hours/1,000 sf/day	1,601
		1,357	sf	Office	35.5 KW-Hours/1,000 sf/day	48
		(58,323)	sf	University of CA Laundry Building (to be removed)	37.1 KW-Hours/1,000 sf/day	(2,164)
14	S/o Jefferson Blvd., E/o Lincoln Blvd.	Playa Vista Phase I				
		3,246	du	Condominium	15.4 KW-Hours/du/day	49,988
		2,142,050	sf	Office	35.5 KW-Hours/1,000 sf/day	76,043
		25,000	sf	Retail	37.1 KW-Hours/1,000 sf/day	928
		1,129,900	sf	Production & Staging Support	28.8 KW-Hours/1,000 sf/day	32,541
		65,000	sf	Community Serving Uses	28.8 KW-Hours/1,000 sf/day	1,872
		(2,166)	du	Condominium	15.4 KW-Hours/du/day	(33,356)
		(221,000)	sf	Office	35.5 KW-Hours/1,000 sf/day	(7,846)
		(12,500)	sf	Retail	37.1 KW-Hours/1,000 sf/day	(464)
15	S/o Jefferson Blvd./ Westlawn Ave.[d]	Playa Vista Phase II				
		175,000	sf	Office	35.5 KW-Hours/1,000 sf/day	6,213
		2,600	du	Apartment	15.4 KW-Hours/du/day	40,040
		150,000	sf	Shopping Center	37.1 KW-Hours/1,000 sf/day	5,565
		40,000	sf	Community Serving Uses	28.8 KW-Hours/1,000 sf/day	1,152
16	N/s Fiji Wy., w/o Admiralty Wy. (Parcel 52/GG)[h]	345	Vessel	Dry Stack Storage Facility	n/a[i]	-
		30	Vessel	Mast Up Storage Space	n/a[i]	-
		1,500	sf	Sheriff Boatwright Facility	35.5 KW-Hours/1,000 sf/day	53
17	1 LMU Dr.[e]	7,800	st	Loyola Marymount University Master Plan	0.03 KW-Hours/st/day	234
18	6161 W Centinela Ave.[f]	Carlyle Radisson				
		342,409	sf	Office	35.5 KW-Hours/1,000 sf/day	12,156

Table IV.L-13 (Continued)
Cumulative Electricity Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (KW-Hours/day)
19	9204 Airport Blvd.[g]	Airport Blvd Carwash				
		15,380[j]	sf	Car Wash	37.1 KW-Hours/1,000 sf/day	571
		(15,251)	sf	Car Rental Facility (to be removed)	37.1 KW-Hours/1,000 sf/day	(566)
					Related Projects Total	**201,718**
					Proposed Project Net Total	**1,055**
					Cumulative Total	**202,773**

[a] *Traffic impact study for Bank of America project at Lincoln Boulevard/Manchester Ave., Crain & Associates, June 2008.*
[b] *Traffic analysis for a Proposed 478-unit Residential Development on Parcel 64 in Marina del Rey, Crain & Associates, January 2007.*
[c] *Traffic study for the Fisherman's Village Retail and Commercial Development Project, Hirsch Green Traffic Consultant, March 2007.*
[d] *Traffic analysis for the Village at Playa Vista Project, Kaku Associates, Inc. and Raju Associates, Inc., July 2003.*
[e] *No net increase of number of students or expansion of campus square footage. Therefore, no net increase trip generation for the project.*
[f] *Traffic Impact Study Report for Proposed Entrada Office Project at 6161 W. Centinela Avenue, Culver City, Crain & Associates, November 16, 2007. Added as part of the analysis as a worst case scenario.*
[g] *Memorandum of Understanding (MOU) for the 9204 Airport Boulevard Carwash Project, Crain & Associates, March 19, 2008.*
[h] *Located in Marina Del Rey and added as part of the analysis as a worst case scenario.*
[i] *Uses are not anticipated to consume electricity, therefore no consumption rate was used.*
[j] *Based on telephone communication with Helen Shi at Crain & Associates, July 1, 2008.*
[k] *Estimated as 600 sf per room.*
[l] *Estimated as 32,300 sf.*
Source: Crain & Associates, Traffic Impact Study for Residential Project at Lincoln Boulevard/Manchester Avenue (8601 Lincoln Boulevard), City of Los Angeles, June 23, 2008, p. 27-29.

MITIGATION MEASURES

Because no significant impacts related to electricity service have been identified, no mitigation measures are required. However, the City requires implementation of the following standard measures to minimize impacts:

L-15. Windows shall be designed to reduce thermal gain and loss and thus cooling loads during warm weather, and heating loads during cool weather (e.g., tinting, double pane glass, etc.).

L-16. Thermal insulation that exceeds requirements established by the State of California Energy Conservation Standards shall be installed in walls and ceilings.

L-17. High-efficiency lamps shall be installed for all outdoor security lighting.

L-18. Time control interior and exterior lighting shall be installed. These systems shall be programmed to account for variations in seasonal daylight times.

L-19. Exterior walls shall be finished with light-colored materials and high-emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light-colored materials to reflect more light and thus increase lighting efficiency.

L-20. If applicable, the Applicant shall coordinate with LADWP and fund the installation of the upgraded facilities as needed to maintain an adequate electricity distribution system and/or to connect the project site to the surrounding infrastructure.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to electricity services would be less than significant.

ENVIRONMENTAL SETTING

Natural Gas Supplies

The Southern California Gas Company (SCG) provides natural gas resources to the City of Los Angeles and the majority of Southern California and Central California from the United States/Mexico border to Visalia, California. SCG serves approximately 20.3 million customers through 5.7 million meters in more than 500 communities.[71] The availability of natural gas is based upon present conditions of gas supply and regulatory policies as SCG is under the jurisdiction of the California Public Utilities Commission (PUC) and other Federal regulatory agencies. In addition, SCG makes available to its customers energy efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption.

SCG obtains its gas resources from several sedimentary basins, including: the San Juan Basin in New Mexico, the Permian Basin in West Texas, Rocky Mountain, Western Canada, and local California supplies.[72] In the *2006 California Gas Report*, SCG anticipated that re-gasified liquefied natural gas (LNG) would be a significant new source of gas supplies in the U.S. by 2008; however, project delays have pushed back that development, and California has not yet seen any significant LNG supplies, but with the completion of the Costa Azul LNG terminal in Baja California, Mexico, in May 2008, LNG is likely to still increase significantly as a supplier source to California in the years ahead.[73]

Currently, the existing uses on the project site consume an estimated 2,400 cubic feet (cf) of natural gas per day (see Table IV.L-14).

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[71] *The Southern California Gas Company, About Us, Company Profile, http://www.socalgas.com/aboutus/profile.html, September 9, 2008.*

[72] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

[73] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

Table IV.L-14
Existing Uses Natural Gas Consumption

Land Use	Size	Consumption Rate	Total (cf/day)
Retail	24,000 sf	100 cf/1,000 sf/day	2,400
		Total	**2,400**

cf = cubic feet
sf = square feet
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.

Southwestern United States Gas Supplies

Natural gas obtained from the San Juan Basin in New Mexico provides the majority of gas sold by SCG. However, the San Juan Basin's conventionally produced gas supplies peaked in 1999 and have been declining at an annual rate of -1.4 percent.[74] Even so, Permian Basin's gas provides an additional source of supply. Natural gas supplies from the San Juan Basin are delivered to the Southern California region through the El Paso Natural Gas Company and the Transwestern Pipeline Company pipelines.[75]

Rocky Mountain Gas Supplies

Natural gas obtained from sources the Rocky Mountain region is considered to be a viable alternative to the traditional source of natural gas in the southwestern United States. These natural gas supplies are delivered to the Southern California region through the Kern River Gas Transmission Company's pipeline. Access to Rocky Mountain gas is also available through pipeline interconnections with the San Juan Basin. As of 2007, production from the Rocky Mountain region had doubled since 2000 due to the successful applications of new technology to drill for coal-bed methane gas. For the first time, the annual average production rate had exceeded ten billion cubic feet per day (Bcf/day) in 2007.[76]

Canadian Gas Supplies

Natural gas obtained from Canada and delivered to Southern California is expected to decline over the next several years as new pipeline capacity to the United States Midwest and Eastern United States is

[74] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

[75] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

[76] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

expected to divert Canadian natural gas supplies away from California. An increase in supplies from the Permian Basin and the Rockies is anticipated to replace the diverted Canadian natural gas supplies.[77]

Liquefied Natural Gas Supplies

SCG anticipates that future natural gas demand will be met by re-gasified LNG. Exact amounts available and the locations of such future re-gasification terminals are not yet certain. However, as of May 2008, the Energia Costa Azul LNG receiving terminal in Ensenada, Baja California, Mexico was certified, providing another source of supply for California.[78] This terminal has the capability of re-gasifying one Bcf/day of LNG, and the potential to expand its capabilities to 2.5 Bcf/day in the future.[79] There remains some uncertainty about the volume of LNG supplies that will be delivered to California from the Costa Azul terminal in the coming years, but it is likely that these supplies will begin to play a more significant role in serving demand in the Southern California area.

Storage

Underground storage of natural gas plays a vital role in balancing the region's energy supply and demand. SCG owns and operates four underground storage facilities located at Aliso Canyon, Honor Rancho, Goleta, and Playa Del Rey. Of SCG's total 131.1 Bcf of storage capacity, 79 Bcf is allocated to core residential, small industrial, and commercial customers; and about five Bcf of space is used for system balancing.[80] The remaining capacity is available to other customers.

Natural Gas Distribution System

Interstate Distribution System

Natural gas is supplied to the Southern California region through a system of interstate pipelines. Current capacities in the interstate pipeline system provide approximately 7.3 Bcf/day with approximately 3.9 Bcf/day firm receipt capacity utilized for Southern California core customers' to access from interstate pipelines.[81] As such, there is approximately 3.4 Bcf/day of excess capacity in the interstate pipeline system.

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[77] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

[78] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

[79] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

[80] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

[81] *California Gas and Electric Utilities, 2008 California Gas Report, http://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, September 9, 2008.*

Local Distribution System

SCG provides natural gas resources to the City of Los Angeles through existing gas mains located under the streets and public right-of-ways. SCG has approximately 48,000 miles of existing gas mains, of which approximately 44,000 miles are dedicated to distribution and approximately 3,319 miles are dedicated to storage and transmission. Natural gas services are provided in accordance with SCG's policies and extension rules on file with PUC at the time contractual agreements are made.

Energy Efficiency Programs

SCG offers Energy Efficiency (EE) programs to provide incentives for customers and developers to reduce natural gas consumption.

Advanced Home Program

Under the Advanced Home program, SCG provides incentive funds for building new single-family and both low-rise and high-rise multi-family construction that exceed the California Building Energy Efficiency Standard (Title 24 of CCR) by at least 15 percent. This program promotes a comprehensive residential new construction concept with cross-cutting focus to sustainable design and construction, green building practices, energy efficient and emerging technologies. Compliance must be demonstrated through the performance method utilizing approved California Energy Commission (CEC) compliance software, and compliance must be demonstrated for the building as a whole and may not group unrelated or detached buildings together.[82]

Regulatory Framework

Title 24 of the California Code of Regulations

Title 24 is the California Building Code, governing all aspects of building construction. Included in Part 6 of the code are standards mandating energy efficient measures in new construction that are updated every three years to allow new energy efficiency technologies to be considered. These energy measures are known as the State Building Energy Efficiency Standards. The efficiency standards apply to new construction of both residential and non-residential buildings, and require certain features to be installed in order to regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings provided these standards meet or exceed those provided in Title 24 guidelines.

[82] *The Southern California Gas Company, Energy Efficiency, Advanced Home Program, Program Application and Forms, 2006-2008 Participant Handbook, http://www.socalgas.com/construction/ahp/, September 9, 2008.*

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Proposed Project with respect to natural gas are determined based on the proposed increase in natural gas demand and the capacity of existing and proposed distribution infrastructure. The existing natural gas demand is compared to the Proposed Project's natural gas demand and natural gas infrastructure capacity, including improvements and energy efficiency standards associated with the Proposed Project. Natural gas consumption is estimated based on consumption rates provided by the SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.

Thresholds of Significance

The *State CEQA Guidelines* provides no specific thresholds for impacts associated with natural gas consumption.

However, in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;

(b) Whether and when the needed infrastructure was anticipated by adopted plans; and

(c) The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Project Impacts

As discussed in Section III, Project Description, development of the Proposed Project would involve the demolition of all existing uses and the construction of 260 apartment units, including 16 joint live/work units, in a four- to six-story building above three levels of parking. In 2004, City Council adopted a Mitigated Negative Declaration (MND) for the Playa del Oro mixed-use development, a portion of which has recently been constructed on the property that adjoins the project site. A portion of the Playa del Oro development originally included a 134-unit multi-family residential building on the westerly end of the Playa del Oro site, which will no longer be constructed. In lieu of constructing the previously-approved, vested and mitigated 134-unit building, the Applicant proposes to construct the Proposed Project, which is comprised of 260 units, resulting in a net increase of 126 dwelling units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the baseline conditions have been adjusted to assume that the approved Playa del Oro development already exists on the eastern portion of the project site. Therefore, the following discussion focuses on the incremental effects of constructing an additional 126 dwelling units (as compared to the previously-approved Playa del Oro project) on an expanded project site.

Currently, an estimated 2,400 cf of natural gas per day are consumed on-site (see Table IV.L-14 above). As shown in Table IV.L-15, Proposed Project Natural Gas Consumption, the Proposed Project would generate a net demand increase of 14,446 cf over the baseline conditions.

Table IV.L-15
Proposed Project Natural Gas Consumption

Land Use	Size	Consumption Rate[a]	Total (cf/day)
Proposed Project			
Residential/Live/Work Units	260 units	133.7 cf/unit/day	34,762
		Proposed Project Subtotal	***34,762***
Less Baseline Conditions			
Existing Retail	24,000 sf	100 cf/1,000 sf/day	2,400
Previously-Approved Residential Building	134 units	133.7 cf/unit/day	17,916
		Baseline Conditions Subtotal	***20,316***
		Net Increase in Natural Gas Consumption over Baseline	**14,446**

[a] *SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.*
Source (table): Christopher A. Joseph & Associates, February 2009.

Natural Gas Supplies

According to the 2008 California Gas Report, natural gas supplies from the southwestern United States (i.e., the San Juan Basin and the Permian Basin) are expected to meet Southern California's gas demand.[83] Furthermore, Title 24 of CCR establishes energy conservation standards for new construction. These energy conservation standards address insulation, glazing, lighting, shading, and water and space heating systems. The Applicant would be required to incorporate the energy conservation measures (refer to measures L-15 through L-19) into the project design and operation. With modern energy efficient construction materials, the Proposed Project would be consistent with the City's energy conservation standards also helping to reduce demand for natural gas. As such, impacts to natural gas supplies as a result of buildout of the Proposed Project would be less than significant.

Natural Gas Distribution System

According to the 2008 California Gas Report, SCG operates in an environment where interstate pipeline capacity exists in excess of anticipated demand.[84] Therefore, there is adequate pipeline capacity to deliver natural gas to the City of Los Angeles.

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[83] *The Southern California Gas Company, Energy Efficiency, Advanced Home Program, Program Application and Forms, 2006-2008 Participant Handbook, http://www.socalgas.com/construction/ahp/, September 9, 2008.*

[84] *The Southern California Gas Company, Energy Efficiency, Advanced Home Program, Program Application and Forms, 2006-2008 Participant Handbook, http://www.socalgas.com/construction/ahp/, September 9, 2008.*

CUMULATIVE IMPACTS

As shown in Table IV.L-16, Cumulative Natural Gas Consumption, the related projects within the City of Los Angeles, Culver City, and Marina Del Rey would consume an estimated 985,474 cf of natural gas per day.

Table IV.L-16
Cumulative Natural Gas Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (cf/day)
1	SWC Lincoln Blvd./Manchester Ave.	Playa del Oro/Furama Redevelopment				
		539	du	Apartment	133.7 cf/du/day	72,064
		27,000	sf	Retail	100 cf/1,000 sf/day	2,700
		(500)	rm	Hotel (to be removed)	166.7 cf/room/day	(50,010)[k]
		(10,420)	sf	Retail (to be removed)	100 cf/1,000 sf/day	(1,042)
		(10,590)	sf	Office (to be removed)	66.7 cf/1,000 sf/day	(706)
		(4,800)	sf	High-Turnover Restaurant (to be removed)	100 cf/1,000 sf/day	(480)
2	7215 W. Manchester Ave.[a]	4,850	sf	Walk-In Bank	66.7 cf/1,000 sf/day	323
3	6225 W. Century Blvd.	180	du	Hotel	166.7 cf/1,000 sf/day	18,004[k]
4	7900 S. Loyola Blvd.	16	st	Daycare Center	0.07 cf/st/day	1
5	7831 Sepulveda Blvd.	600	st	School Expansion	0.07 cf/st/day	42
6	5401 Beethoven St.	420	st	Private School	0.07 cf/st/day	29
7	8632 Sepulveda Blvd.	3,621	sf	Walk-In Bank	66.7 cf/1,000 sf/day	242
8	5550 Grosvenor Blvd.	208	du	Condominium	133.7 cf/du/day	27,810
9	4500 Via Marina[h]	120	du	Apartment (expansion)	133.7 cf/du/day	16,044
10	Southern terminus of Fiji Wy. (Parcel 64)[b, h]	478	du	Multi-Family Residential	133.7 cf/du/day	63,909
		500	sf	Restaurant	100 cf/1,000 sf/day	50
		34	slip	Boat	n/a[i]	-
		(224)	du	Apartment (to be removed)	133.7 cf/du/day	(29,949)
11	W/o Fiji Wy. Near Terminus Fisherman's Village[c, h] (Parcels 55/56/W)	132	rm	Hotel	166.7 cf/1,000 sf/day	13,203[k]
		1,230	seat	Restaurant	100 cf/1,000 sf/day	3,230[l]
		24,250	sf	Retail	100 cf/1,000 sf/day	2,425
		5,200	sf	Office	66.7 cf/1,000 sf/day	347
		26	slip	Boat	n/a[i]	-
		(12,984)	sf	Retail/Commercial (to be	100 cf/1,000 sf/day	(1,298)

Table IV.L-16
Cumulative Natural Gas Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (cf/day)
				removed)		
		(16,149)	sf	Restaurant (to be removed)	100 cf/1,000 sf/day	(1,615)
		(17)	slip	Boat (to be removed)	n/a[i]	-
12	W/o Lincoln Blvd., N/o Fiji Wy. (Parcels 50&83)[h]	4,700	sf	Specialty Retail	100 cf/1,000 sf/day	470
13	12700 Braddock Dr.	134,557	sf	Warehouse	97,986.7 cf/parcel/day	97,987
		1,357	sf	Office	66.7 cf/1,000 sf/day	91
		(58,323)	sf	University of CA Laundry Building (to be removed)	100 cf/1,000 sf/day	(5,832)
14	S/o Jefferson Blvd., E/o Lincoln Blvd.	Playa Vista Phase I				
		3,246	du	Condominium	133.7 cf/du/day	433,990
		2,142,050	sf	Office	66.7 cf/1,000 sf/day	142,875
		25,000	sf	Retail	100 cf/1,000 sf/day	2,500
		1,129,900	sf	Production & Staging Support	66.7 cf/1,000 sf/day	75,364
		65,000	sf	Community Serving Uses	100 cf/1,000 sf/day	6,500
		(2,166)	du	Condominium	133.7 cf/du/day	(289,594)
		(221,000)	sf	Office	66.7 cf/1,000 sf/day	(14,741)
		(12,500)	sf	Retail	100 cf/1,000 sf/day	(1,250)
15	S/o Jefferson Blvd./ Westlawn Ave.[d]	Playa Vista Phase II				
		175,000	sf	Office	66.7 cf/1,000 sf/day	11,673
		2,600	du	Apartment	133.7 cf/du/day	347,620
		150,000	sf	Shopping Center	100 cf/1,000 sf/day	15,000
		40,000	sf	Community Serving Uses	100 cf/1,000 sf/day	4,000
16	N/s Fiji Wy., w/o Admiralty Wy. (Parcel 52/GG)[h]	345	Vessel	Dry Stack Storage Facility	n/a[i]	-
		30	Vessel	Mast Up Storage Space	n/a[i]	-
		1,500	sf	Sheriff Boatwright Facility	66.7 cf/1,000 sf/day	100
17	1 LMU Dr.[e]	7,800	st	Loyola Marymount University Master Plan	0.07 cf/st/day	546
18	6161 W Centinela Ave.[f]	Carlyle Radisson				
		342,409	sf	Office	66.7 cf/1,000 sf/day	22,839

Table IV.L-16
Cumulative Natural Gas Consumption

Map No.	Location (Address)	Size	Unit	Description	Consumption Rate	Total (cf/day)
19	9204 Airport Blvd.[g]	Airport Blvd Carwash				
		15,380[j]	sf	Car Wash	100 cf/1,000 sf/day	1,538
		(15,251)	sf	Car Rental Facility (to be removed)	100 cf/1,000 sf/day	(1,525)
					Related Projects Total	**985,474**
					Proposed Project Net Total	**14,446**
					Cumulative Total	**999,920**

[a] *Traffic impact study for Bank of America project at Lincoln Boulevard/Manchester Ave., Crain & Associates, June 2008.*
[b] *Traffic analysis for a Proposed 478-unit Residential Development on Parcel 64 in Marina del Rey, Crain & Associates, January 2007.*
[c] *Traffic study for the Fisherman's Village Retail and Commercial Development Project, Hirsch Green Traffic Consultant, March 2007.*
[d] *Traffic analysis for the Village at Playa Vista Project, Kaku Associates, Inc. and Raju Associates, Inc., July 2003.*
[e] *No net increase of number of students or expansion of campus square footage. Therefore, no net increase trip generation for the project.*
[f] *Traffic Impact Study Report for Proposed Entrada Office Project at 6161 W. Centinela Avenue, Culver City, Crain & Associates, November 16, 2007. Added as part of the analysis as a worst case scenario.*
[g] *Memorandum of Understanding (MOU) for the 9204 Airport Boulevard Carwash Project, Crain & Associates, March 19, 2008.*
[h] *Located in Marina Del Rey and added as part of the analysis as a worst case scenario.*
[i] *Uses are not anticipated to consume natural gas, therefore no consumption rate was used.*
[j] *Based on telephone communication with Helen Shi at Crain & Associates, July 1, 2008.*
[k] *Estimated as 600 sf per room.*
[l] *Estimated as 32,300 sf.*
Source: Crain & Associates, Traffic Impact Study for Residential Project at Lincoln Boulevard/Manchester Avenue (8601 Lincoln Boulevard), City of Los Angeles, June 23, 2008, p. 27-29.

As shown in Table IV.L-15 above, the Proposed Project would generate a net demand increase estimated at 14,446 cf per day. The natural gas consumption of the Proposed Project in combination with the related projects would be approximately 999,920 cf per day (see Table IV.L-16).

According to the 2008 California Gas Report, natural gas supplies from the southwestern United States (i.e., the San Juan Basin and the Permian Basin) are expected to meet Southern California's gas demand.[85] Furthermore, Title 24 of CCR establishes energy conservation standards for new construction. These energy conservation standards address insulation, glazing, lighting, shading, and water and space heating systems. With modern energy efficient construction materials, the Proposed Project and the related projects would be consistent with the City's energy conservation standards by helping to reduce demand for natural gas. As such, cumulative impacts to natural gas supplies as a result of the buildout of the Proposed Project and the related projects would be less than significant.

[85] *The Southern California Gas Company, Energy Efficiency, Advanced Home Program, Program Application and Forms, 2006-2008 Participant Handbook, http://www.socalgas.com/construction/ahp/, September 9, 2008.*

MITIGATION MEASURES

Because no significant impacts related to natural gas service have been identified, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to natural gas supplies and infrastructure would be less than significant.

V. GENERAL IMPACT CATEGORIES

A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *State CEQA Guidelines* requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

Based on the analysis contained in Section IV of this Draft EIR, implementation of the Proposed Project would result in significant unavoidable environmental impacts relative to construction noise.

Noise

With compliance with Section 41.40 of the LAMC and the implementation of the Mitigation Measures H-1 through H-9, which would require the implementation of noise reduction devices and techniques during construction at the project site, construction-related noise impacts associated with the Proposed Project would be reduced to the maximum extent feasible. Nevertheless, because construction noise levels are likely to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period and by more than 10 dBA for more than one day, construction noise impacts would be significant and unavoidable.

B. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the *State CEQA Guidelines* states that the "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." Section 15126.2(c) further states that "irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The types and level of development associated with the Proposed Project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the Proposed Project and would continue throughout its operational lifetime. The development of the Proposed Project would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project sites.

Construction of the Proposed Project would require consumption of resources that are not replenishable or which may renew slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics) and

water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Proposed Project. However, because the Proposed Project proposes to achieve LEED certification, the amount of resources consumed for construction purposes would generally be less than as is consumed with typical construction. This resource consumption would be consistent with growth and anticipated change in the Los Angeles region.

C. GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the *State CEQA Guidelines* requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the *State CEQA Guidelines* states:

> *"Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."*

Project Site

The Proposed Project would foster economic growth and revitalize an underutilized area in the City of Los Angeles by adding residents and joint live/work units to the project site. These residents could, in turn, patronize existing local businesses and services in the area while the addition of new businesses, established through the joint live/work units could provide new retail or service opportunities for the existing population. Additionally, as described under Section IV.I, Population, Housing and Employment short-term and long-term employment opportunities would be provided during construction and operation of the Proposed Project.

The Proposed Project would increase the permanent population of the area by approximately 374 persons. This increased residential population would patronize local businesses and services in the area, which would foster economic growth. As shown in Section IV.I, the Proposed Project's impacts on population, housing, and employment would be less than significant. In addition, the Proposed Project would not induce growth in an area that is not already developed with infrastructure to accommodate such growth,

including, among other things, extensive public transportation. Off-site utility infrastructure adjacent to the project site would adequately service the Proposed Project. Further, the Proposed Project, as an urban redevelopment, would be adequately served by existing public services such as fire, police, and public schools.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

The CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives designed to reduce the significant environmental impacts of a project, while still meeting basic project objectives. The CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below. It should be noted that even with compliance with Section 41.40 of the LAMC and the implementation of the noise reduction mitigation measures, which would require the implementation of noise reduction devices and techniques during construction at the project site, construction-related noise impacts associated with each of the alternatives, excluding the No Project Alternative, would be reduced to the maximum extent feasible. Nevertheless, because construction noise levels are likely to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period and by more than 10 dBA for more than one day, construction noise impacts would be significant and unavoidable for each of these alternatives, excluding the No Project Alternative.

Alternatives to the Proposed Project

Section 21002.1(a) of the CEQA Statutes (Public Resources Code) states:

> *The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to a project, and to indicate the manner in which those significant effects can be mitigated or avoided.*

More specifically, Section 15126.6(a) of the *State CEQA Guidelines* states:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature of scope of the alternatives to be discussed other than the rule of reason.*

Purpose

Section 15126.6(b) of the *State CEQA Guidelines* states:

> *Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially*

> *lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.*

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the *State CEQA Guidelines* states:

> *The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic Project objectives, (ii) infeasibility, or (iii) inability to avoid significant environment impacts.*

Level of Detail

The *State CEQA Guidelines* do not require the same level of detail in the alternatives analysis as in the analysis of the Proposed Project. Section 15126.6(d) of the *State CEQA Guidelines* states:

> *The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.*

Overview of Selected Alternatives

As indicated above, project alternatives should feasibly be able to attain "most of the basic objectives of the project" (*State CEQA Guidelines* Section 15126.6(a)), even though implementation of the project alternatives might, to some degree, impede the attainment of those objectives or be more costly (*State CEQA Guidelines* Section 15126.6(b)). For purposes of this alternatives analysis, the following alternatives were identified and analyzed:

<u>Alternative A:</u> No Project Alternative

<u>Alternative B:</u> Reduced Density Alternative

<u>Alternative C:</u> Mixed-Use (Retail/Residential) Alternative

Alternative D: Existing Zoning Alternative

Alternatives Rejected as Being Infeasible

Section 15126.6(c) of the *State CEQA Guidelines* requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. One alternative was considered and rejected as being infeasible for the Proposed Project: development of an alternate site. The project applicant does not currently own or control other potential sites for the Proposed Project in Westchester, nor can the project applicant reasonably acquire or otherwise have access to such alternate sites.

Assumption and Methodology

The anticipated means for implementing the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate impacts but consideration in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the Proposed Project and assumes that all applicable mitigation measures proposed for the project would apply to each alternative. Impacts associated with the alternatives are compared to project-related impacts and are classified as greater than, less than, or similar to (or comparable to) the level of impacts associated with the Proposed Project.

The following alternative analysis compares the potential environmental impacts of four alternatives to those of the Proposed Project for each of the environmental topics analyzed in detail in Section IV (Environmental Impact Analysis) of this Draft EIR.

Project Objectives

The range of potential alternatives to the Proposed Project shall include those that could feasibly accomplish most of the basic objectives of the Proposed Project. The objectives of the Proposed Project are as follows:

- To establish infill development providing housing to serve the local community in a manner consistent with the RAS4 zone;
- To maintain the opportunity for a commercial presence along Manchester Avenue by providing joint live/work units;
- To provide a development that is compatible and complementary with surrounding land uses;
- To provide adequate parking facilities to serve the proposed development residents and guests; and
- To redevelop the project site in a manner that is financially feasible.

A. NO PROJECT ALTERNATIVE

The No Project Alternative is the circumstance under which the project does not proceed. Pursuant to *State CEQA Guidelines* Section 15126.6(e)(2):

> *The 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved, based on current plans, and consistent with available infrastructure and community services.*

Under the No Project Alternative, the commercial uses and surface parking lot currently located on the western portion of the project site would remain at their current levels of operation. As described in Section III. Project Description, the Applicant has a vested right to construct 134 previously-approved dwelling units on the eastern portion of the project site. Therefore, pursuant to CEQA and what would reasonably be expected to occur in the foreseeable future, under the No Project Alternative, no new development would occur on the western portion of the project site; however, the 134 dwelling units would be developed on the eastern portion of the project site.

Aesthetics

Under the No Project Alternative, no new development would occur on the western portion of the project site and the 24,000 square feet of commercial uses as well as the associated surface parking lot currently existing on-site would remain. The eastern portion of the project site would be developed with the previously-approved 134 dwelling units. Just as with the Proposed Project, the No Project Alternative would not affect views from a designated scenic highway, corridor, or parkway; neither would it substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings. While there are two native Coast Live Oaks on the project site, (protected under Los Angeles Municipal Ordinance 177,404) neither tree is in an aesthetically pleasing condition (refer to Appendix J, *Playa Manchester Project Tree Report*, dated August 2009) and as they are in planters behind the existing retail development they cannot be seen from any of the surrounding areas. Therefore, these trees do not constitute a scenic resource. Therefore, impacts under the No Project Alternative with respect to scenic resources would be less than those associated with the Proposed Project, although impacts under the Proposed Project would be less than significant. Conversely, potentially beneficial impacts of constructing a mixed-use project on the site, as well as replanting of landscaping on the western portion of the project site that would potentially improve the visual qualities of the project site and the surrounding area would not occur under this alternative.

Under the No Project Alternative, no new light sources would be introduced on the western portion of the project site. Under this alternative, glare coming from car windshields on the surface parking lot would remain. The Proposed Project would eliminate the existing source of glare from windshields of parked cars by moving all parking to the enclosed parking garage. Additionally, although the Proposed Project includes glass windows, which could result in some transitory conditions of glare during the day, implementation of mitigation measures requires the use of glass with low reflectivity or non-glare

coating, thus reducing the net potential for glare generation. Nonetheless, existing glare from car windshields is minimal. Therefore, impacts associated with glare under the No Project Alternative would be similar those associated with the Proposed Project.

Air Quality

Construction Impacts

Under the No Project Alternative, no new construction would occur on the western portion of the project site. However, the eastern portion of the project site would be developed with the previously-approved 134 dwelling units. Since no site demolition or excavation associated with new construction would occur on the western portion of the project site, no short-term air emissions associated with these activities would occur. Therefore, construction air quality impacts associated with the No Project Alternative would be less than under the Proposed Project, although the Proposed Project would result in less than significant impacts.

Operational Impacts

Under the No Project Alternative, no new development would occur on the western portion of the project site. Under this alternative, the 24,000 square feet of retail uses and the surface parking area on the western portion of the project site would remain. No new sources of stationary (e.g., space and water heating) or mobile (e.g., vehicle) emissions would be generated at the project site. As discussed further in Section IV.K. Traffic, Transportation, and Parking, development of the Proposed Project would result in a net reduction of approximately 156 daily vehicle trips to and from the project site. Nonetheless, development of the Proposed Project would result in greater greenhouse gas emissions from natural gas consumption and electricity generation than would the No Project Alternative. Therefore, operational air quality impacts under the No Project Alternative would be less than those associated with the Proposed Project, although both scenarios would result in less than significant impacts.

Hazards and Hazardous Materials

Under the No Project Alternative, no new construction, grading, or demolition would occur. The existing buildings and surface parking lot located on the western portion of the project site would remain in operation in their current locations. No new sources of contamination would be brought onto the project site (e.g., no construction materials, maintenance supplies, etc.). However, as no construction or excavation would occur on the western portion of the project site under the No Project Alternative, underground storage tanks associated with the existing auto-mechanic uses as well as the former Gerald's Hardware Store would remain on-site. Therefore, impacts associated with storage tanks under the No Project Alternative would be greater than those associated with the Proposed Project. The existing buildings would remain on the western portion of the project site, therefore, any asbestos containing materials (ACMs) or lead based paint (LBP) present in those buildings would remain undisturbed. Therefore, impacts associated with ACMs and LBP under the No Project Alternative would be less than those associated with the Proposed Project, which are also less than significant. Additionally, the western portion of the project site is located within a Methane Buffer Zone as identified by the City. Under the No Project Alternative, the existing structures on the western portion of the project site would remain in

their current condition. Under the Proposed Project, the Applicant would be required to incorporate methane mitigation measures. Therefore, impacts related to methane gas under the No Project Alternative would be greater than those associated with the Proposed Project.

Hydrology and Water Quality

Under the No Project Alternative, no new construction, grading, or demolition would occur on the western portion of the project site. The project site is not at risk for impacts associated with tsunamis, seiches, or flooding. Stormwater runoff would continue to flow into the existing storm drain system located in the surrounding roadways. However, the Proposed Project's potentially beneficial impacts with respect to stormwater runoff quality that would result from implementation of Best Management Practices on the western portion of the project site, as required under the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP), would not occur under this alternative. Therefore, stormwater runoff and water quality impacts under the No Project Alternative would be greater than those identified under the Proposed Project.

Land Use and Planning

Under the No Project Alternative, no new development would occur and the existing commercial uses and associated surface parking lot would remain on the western portion of the project site. The project site would retain its General Plan designations and zoning classifications ([Q]C4-1-CDO on the western portion and [Q]RAS4-1-CDO on the eastern portion) and no zone change would be required. The Proposed Project would include design elements to encourage pedestrianism and allow access from Manchester Avenue as well as reduce the need for automobiles, elements which are consistent with the goals of the Westchester-Playa del Rey Community Plan (Community Plan) and the Loyola Village Community Design Overlay (CDO). However, as no new development would occur on the western portion of the project site under the No Project Alternative, this alternative would not accomplish or implement the guidelines or standards set forth in regional and local plans and policies to the same extent as the Proposed Project. As no new development would occur on the western portion of the project site, the existing commercial uses would remain on-site in their current condition. The existing uses on the western portion of the project site are not designed to incorporate guidelines set forth in the Loyola Village CDO. Specifically, the existing uses contain a surface parking lot and do not provide pedestrian access from Manchester Avenue. Nonetheless, the Proposed Project would require a Zone Change whereas the No Project Alternative would not. Therefore, impacts associated with the No Project Alternative with respect to land use compatibility would be less than those associated with the Proposed Project.

Noise

Construction Impacts

Under the No Project Alternative, no new construction would occur on the western portion of the project site. Development of the previously-approved 134 dwelling units would occur on the eastern portion of the project site under the No Project Alternative. However, noise impacts resulting from development of the eastern portion of the project site were analyzed prior to approval of the development. Thus,

development of the 134 previously-approved dwelling units on the eastern portion of the project site would constitute the baseline condition under the No Project Alternative. The Proposed Project would expose nearby sensitive receptors to temporary construction noise, whereas this alternative would not. Therefore, under the No Project Alternative, no impact would occur with respect to construction noise and vibration. This alternative would avoid the significant and unavoidable impacts associated with the Proposed Project. Impacts would be less than significant without the need for mitigation.

Operational Impacts

Under the No Project Alternative, no new development would occur on the western portion of the project site. Development of the previously-approved 134 dwelling units would occur on the eastern portion of the project site under the No Project Alternative. However, impacts on public services resulting from development of the eastern portion of the project site were analyzed prior to approval of the development. Thus, development of the 134 previously-approved dwelling units on the eastern portion of the project site would constitute the baseline condition under the No Project Alternative. As discussed in Section IV. K. Traffic, Transportation, and Parking of this Draft EIR, the residential uses of the Proposed Project would result in a net decrease in daily trips when compared to the existing retail uses. Therefore, operational noise impacts associated with the No Project Alternative would be greater than those associated with the Proposed Project, although either scenario would result in less than significant impacts.

Population, Housing, and Employment

Under the No Project Alternative, the Proposed Project would not be constructed. Under this alternative, the existing commercial uses and associated surface parking lots would remain on the western portion of the site. As discussed, development of the previously-approved 134 dwelling units would occur on the eastern portion of the project site under the No Project Alternative. However, the population and housing impacts resulting from development of the eastern portion of the project site were analyzed prior to approval of the development. Thus, the residents and housing units generated on the eastern portion of the project site would constitute the baseline condition under the No Project Alternative. Therefore, as no new development would occur on the western portion of the project site, no new permanent population would be added to the Westchester community. Although both the No Project Alternative and the Proposed Project would be within SCAG's projected growth forecasts for the project area, the Proposed Project would introduce housing and population growth in the area, whereas the No Project Alternative would not. Additionally, under the No Project Alternative, there would be no job loss as the existing uses on the western portion of the project site would remain. Therefore, population, housing, and employment impacts associated with the No Project Alternative would be less than those associated with the Proposed Project, although impacts under the Proposed Project would be less than significant.

Public Services

As discussed previously, development of the previously-approved 134 dwelling units would occur on the eastern portion of the project site under the No Project Alternative. However, impacts on public services resulting from development of the eastern portion of the project site were analyzed prior to approval of

the development. Thus, development of the 134 previously-approved dwelling units on the eastern portion of the project site would constitute the baseline condition under the No Project Alternative. The following discussion provides an analysis of the No Project Alternative's potential impacts on public services on the western portion of the project site.

Fire Protection

Under the No Project Alternative, no new development would occur on the western portion of the project site. The level and intensity of fire protection services required under the No Project Alternative would not change from existing conditions. Therefore, impacts on fire protection services under the No Project Alternative would be less than under the Proposed Project, although impacts under the Proposed Project would be less than significant.

Police Protection

Under the No Project Alternative, no development would occur on the western portion of the project site. No new residents would be introduced into the area, thus the level and intensity of police protection services required under the No Project Alternative would not change from existing conditions. Therefore, police protection impacts under the No Project Alternative would be less than those associated with the Proposed Project, although impacts under the Proposed Project would be less than significant.

Schools

Under the No Project Alternative, no development would occur on the western portion of the project site. Because the No Project Alternative would not result in a net increase in dwelling units, no new students would be generated. Therefore, impacts related to schools under the No Project Alternative would be less than those associated with the Proposed Project, although impacts under the Proposed Project would be less than significant.

Recreation and Parks

Under the No Project Alternative, no new development would occur on the western portion of the project site. Under this alternative the existing commercial uses and surface parking lots would remain on the western portion of the project site. As such, no new (or additional) permanent residents would be generated to create a demand on recreation and parks services. Therefore, recreation and parks services under the No Project Alternative would be less than those associated with the Proposed Project, although impacts under the Proposed Project would be less than significant.

Libraries

Under the No Project Alternative, no new development would occur on the western portion of the project site. No new permanent residents would be generated that would increase demands on library services. Therefore, impacts related to library services under the No Project Alternative would be less than the under the Proposed Project, although impacts under the Proposed Project would be less than significant.

Traffic, Transportation, and Parking

Under the No Project Alternative, no new development would occur on the project site and the commercial uses and associated surface parking lots would remain on the western portion of the project site. As discussed in Section IV.K. Traffic, Transportation, and Parking, development of the Proposed Project residential uses would result in a net decrease in daily trips to and from the project site when compared to the existing retail uses, which would be beneficial to the surrounding street system. Additionally, the No Project Alternative would not avoid the increased congestion and declines in level of service of the surrounding street system that would occur as a result of ambient growth and planned related projects in the Westchester community. Therefore, traffic impacts associated with the No Project Alternative would be greater than those associated with the Proposed Project.

Utilities and Services

As discussed, development of the previously-approved 134 dwelling units would occur on the eastern portion of the project site under the No Project Alternative. However, impacts on utilities and services resulting from development of the eastern portion of the project site were analyzed prior to approval of the development. Thus, development of the 134 previously-approved dwelling units on the eastern portion of the project site would constitute the baseline condition under the No Project Alternative. The following discussion provides an analysis of the No Project Alternative's potential impacts on utilities on the western portion of the project site.

Water

Under the No Project Alternative, no new development would occur on the western portion of the project site. No net increase in water consumption would occur at the project site. Therefore, water service impacts under the No Project Alternative would be less than the less than under the Proposed Project, although impacts under the Proposed Project would be less than significant.

Sewer

Under the No Project Alternative, no new development would occur on the western portion of the project site. As such, no net increase in wastewater generation would occur. Therefore, impacts under the No Project Alternative with respect to wastewater conveyance and treatment capacity infrastructure would be less than those associated with the Proposed Project, although impacts under the Proposed Project would be less than significant.

Solid Waste

Under the No Project Alternative, no new development would occur on the western portion of the project site. No net increase in solid waste would be generated. Therefore, impacts under the No Project Alternative with respect to solid waste services would be less than those associated with the Proposed Project, although impacts under the Proposed Project would be less than significant.

Electricity

Under the No Project Alternative, no new development would occur on the western portion of the project site. No net increase in electricity consumption would occur. Therefore, impacts under the No Project Alternative with respect to electricity would be less than those associated with the Proposed Project, although impacts under the Proposed Project would be less than significant.

Natural Gas

Under the No Project Alternative, no new development would occur on the western portion of the project site. No net increase in natural gas consumption would occur. Therefore, impacts under the No Project Alternative with respect to natural gas supply and infrastructure would be less the under the Proposed Project, although impacts under the Proposed Project would be less than significant.

Relationship to Project Objectives

The No Project Alternative would avoid most of the environmental impacts associated with the Proposed Project. However, the No Project Alternative would not achieve the project objectives to the same extent as the Proposed Project.

Specifically, the project objectives are as follows:

- To establish infill development providing housing on-site to serve the local community in a manner consistent with the RAS4 zone;
- To maintain a commercial presence along Manchester Avenue by providing joint live/work units;
- To provide a development that is compatible and complementary with surrounding land uses;
- To provide adequate parking facilities to serve the proposed development residents and guests; and
- To redevelop the project site in a manner that is financially feasible.

The Proposed Project would fulfill the goal of establishing infill development in a manner consistent with the RAS4 zone to a greater extent than the No Project Alternative. Specifically, the purpose of the RAS4 zone is to provide a mechanism to increase housing opportunities, enhance neighborhoods, and revitalize older commercial corridors. The No Project Alternative would not increase housing opportunities or enhance neighborhoods to the same extent as the Proposed Project. Similarly, because the No Project Alternative involves development of an already graded site, the No Project Alternative would not fulfill the RAS4 zone goal of revitalizing older commercial corridors to the same extent as the Proposed Project. Therefore, development of the Proposed Project would achieve the project objectives to a greater extent than development of the No Project Alternative.

Reduction of Significant Project Impacts

Although the No Project Alternative would avoid most of the environmental impacts associated with the Proposed Project, it would increase a few. The Proposed Project would result in significant and unavoidable impacts with respect to Noise (Construction). The No Project Alternative would avoid the significant impacts associated with Noise (Construction) as compared to the Proposed Project, as well as reduce impacts in most other issue areas, but would result in increased environmental impacts with respect to Aesthetics (Visual Character and Glare), Hazards (Storage Tanks and Methane Gas), Hydrology (Operation), Land Use (Compatibility), and Traffic (Operational Project Trips).

B. REDUCED DENSITY ALTERNATIVE

Under the Reduced Density Alternative, the project site would be developed in a manner similar to the Proposed Project. However, the size of the development would be reduced by approximately 25 percent for a total of approximately 199,842 square feet. Whereas the Proposed Project would consist of 260 dwelling units, including 16 joint live/work units, the Reduced Density Alternative would provide a total of 195 dwelling units, including 12 joint live/work units. Similarly, parking facilities, recreational amenities (i.e., the proposed gym/multi-purpose area), and open space would be reduced by 25 percent to approximately 118,203 square feet (357 parking spaces), approximately 1,050 square feet, and approximately 43,828 square feet under this alternative, respectively. Building heights under this alternative would also be reduced by 25 percent. As described in Section III. Project Description, the Applicant has a vested right to construct 134 previously-approved dwelling units on the eastern portion of the project site. As 134 of the 195 proposed residential/live/work units have already been approved and analyzed, the Reduced Density Alternative would result in a net increase of 61 units from the baseline conditions.

Aesthetics

Under the Reduced Density Alternative, the project site would be developed in a manner similar to the Proposed Project. However, under this alternative, the overall amount of development would be reduced by 25 percent, including building heights. Although the size of the structure would be reduced, development of the project site would still occur. Just as with the Proposed Project, the Reduced Density Alternative would not affect views from a designated scenic highway, corridor, or parkway; neither would it substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings. While there are two native Coast Live Oaks on the project site, (protected under Los Angeles Municipal Ordinance 177,404) neither tree is in an aesthetically pleasing condition (refer to Appendix J, *Playa Manchester Project Tree Report*, dated August 2009) and as they are in planters behind the existing retail development they cannot be seen from any of the surrounding areas. Therefore, these trees do not constitute a scenic resource. Therefore, impacts under the Reduced Density Alternative with respect to scenic resources would be similar to those associated with the Proposed Project.

Although the building heights would be reduced under this alternative, they would still be generally taller than the surrounding uses. As such, views of the project site would be available from more off-site locations than at present because of the increased height and mass as compared to the existing uses.

However, viewshed impacts of the Reduced Density Alternative would be less than the Proposed Project due to the reduced building heights. Therefore, impacts under the Reduced Density Alternative with respect to views and visual character of the project site would be less than significant and less than those associated with the Proposed Project.

The western portion of the project site is currently developed with 24,000 square feet of commercial uses as well as associated surface parking. This surface parking is a source of glare from sunlight reflecting off of car windshields. Under the Reduced Density Alternative, cars would be shielded from public view in an enclosed parking structure, thus reducing this glare. Additionally, under this alternative, lighting included in the project design would be shielded and focused on the project site or located indoors. Therefore, light and glare impacts under the Reduced Density Alternative would be similar to those associated with the Proposed Project and less than significant.

Air Quality

Construction Impacts

Under the Reduced Density Alternative, development of the project site would be similar to that of the Proposed Project. However, under this alternative, overall development on the project site, including building height, would be reduced by 25 percent. Construction activities performed during development would be similar to the Proposed Project. However, the duration of construction activities under this alternative would be shorter than under the Proposed Project as less square footage would be developed. Therefore, short-term construction air quality impacts under the Reduced Density Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Operational Impacts

Under the Reduced Density Alternative, the total number of daily vehicle trips to and from the project site would be lower than under the Proposed Project because the overall size of the development would be reduced (see subheading Traffic, Transportation, and Parking, below). Additionally, the project under this alternative would generate fewer greenhouse gas emissions as it would consume less natural gas and electricity than compared to the Proposed Project. Therefore, operational air quality impacts under the Reduced Density Alternative would be less than those associated with the Proposed Project, although both scenarios would result in less than significant impacts.

Hazards and Hazardous Materials

Under the Reduced Density Alternative, land uses developed on the project site would remain the same as described under the Proposed Project; however, overall development would be reduced by 25 percent for a total of approximately 199,842 square feet. Although development would be reduced by 25 percent under this alternative, excavation would still occur for building foundations and the subterranean parking level. Thus, any storage tanks encountered during excavation activities would be removed from the project site. Therefore, impacts related to storage tanks under the Reduced Density Alternative would be similar to those associated with the Proposed Project and less than significant. As existing structures would be demolished under this alternative, it is possible that asbestos-containing materials (ACMs) and

lead-based paint (LBP), should they exist in the structures, could be released into the environment. However, demolition would be required to be conducted in accordance with applicable regulations governing removal and disposal of ACMs and LBP, similar to the Proposed Project. Therefore, impacts under the Reduced Density Alternative with respect to ACMs and LBP would be similar to those associated with the Proposed Project and less than significant. Additionally, it is possible that PCB-containing fixtures may be present on the project site; however, appropriate mitigation measures are required to ensure safe removal of any PCBs encountered. Therefore, impacts with respect to PCBs under the Reduced Density Alternative would be similar to those associated with the Proposed Project and less than significant.

Under the Reduced Density Alternative, the project site would still lie within a City-designated Methane Buffer Zone. The project under this alternative would be required to comply with regulations set forth in LAMC Division 71. Therefore, impacts with respect to methane gas would be similar under this alternative to those associated with the Proposed Project, and less than significant. Under the Reduced Density Alternative, the project site would be in proximity to City-designated disaster routes (Manchester Avenue and Lincoln Boulevard) as well as a City of Los Angeles Maintenance Warehouse, similar to the Proposed Project. However, also similar to the Proposed Project, development of the project under this alternative would neither impede access to or from Manchester Avenue or Lincoln Boulevard, nor would it interfere with operation of the City Maintenance Warehouse. Therefore, impacts under the Reduced Density Alternative related to emergency response plans would be similar to those associated with the Proposed Project and less than significant.

Hydrology and Water Quality

Under the Reduced Density Alternative, land uses developed on the project site would be the same as those described under the Proposed Project. However, under this alternative, overall development on the project site would be reduced by 25 percent for a total of 199,842 square feet. The project site is not at risk for impacts associated with tsunamis, seiches, or flooding. Under the Reduced Density Alternative, construction activities would be similar to the Proposed Project and would include demolition and excavation. As required under the Los Angeles County SUSMP, Best Management Practices would be implemented under this alternative. Therefore, short-term construction impacts on water quality under the Reduced Density Alternative would be similar to those associated with the Proposed Project, and less than significant. Additionally, the same mitigation measures would be implemented under this alternative as under the Proposed Project to reduce impacts on water quality. Therefore, operational water quality impacts under the Reduced Density Alternative would be similar to the Proposed Project and less than significant.

Land Use and Planning

Under the Reduced Density Alternative, land uses developed on the project site would be the same as those described under the Proposed Project. However, under this alternative, overall development on the project site would be reduced by 25 percent for a total of 199,842 square feet. Under the Reduced Density Alternative, the project would include a Discretionary Action that would change the zoning on the western portion of the project site from [Q]C4-1-CDO to (T)(Q)RAS4-1-CDO, similar to the

Proposed Project. Although the overall amount of development would be reduced, the Reduced Density Alternative would include all of the same design elements as the Proposed Project, including elements intended to encourage pedestrianism and allow access from Manchester Avenue as well as reduce the need for automobiles. Therefore, similar to the Proposed Project, the Reduced Density Alternative would be consistent with and would implement regional and local plans and policies. Further, similar to the Proposed Project, development of the project under the Reduced Density Alternative would be compatible with surrounding land uses. However, as building height would be reduced under this alternative, the height of the structure would be more compatible than the Proposed Project with the single-family residential uses to the south of the project site. Impacts with respect to land use compatibility under the Reduced Density Alternative would be similar to those associated with the Proposed Project and less than significant.

Noise

Under the Reduced Density Alternative, the project site would be developed in a manner similar to the Proposed Project. However, overall development on the project site would be reduced by 25 percent. With the reduced size, a total of 195 dwelling units, including 12 joint live/work units, would be developed. Similarly, parking facilities and open space would be reduced by 25 percent to approximately 118,203 square feet (357 parking spaces), and 43,828 square feet under this alternative, respectively. Building heights under this alternative would also be reduced by 25 percent.

Construction Impacts

As the same type of activities and equipment usage would be taking place under the Reduced Density Alternative, construction noise levels would be the same as the Proposed Project. However, the duration of these construction activities would be shorter due to the reduced size of the overall development on the project site. Nevertheless, construction noise and vibration impacts of the Reduced Density Alternative would be significant and unavoidable due to the proximity of sensitive receptors to the project site. Therefore, while impacts from the Reduced Density Alternative would be less than with the Proposed Project, this alternative would not avoid the similar significant and unavoidable construction noise impacts associated with the Proposed Project.

Operational Impacts

The Reduced Density Alternative may result in a slight decrease in operational noise as this alternative would include fewer residential units and would, therefore, result in fewer vehicular trips than the Proposed Project (see subheading Traffic, Transportation, and Parking, below). As discussed under the Traffic, Transportation, and Parking subheading below, the Reduced Density Alternative would result in a net decrease of 547 daily trips whereas the Proposed Project would result in a net decrease of 156 daily trips from baseline conditions. Operational noise impacts would be similarly reduced. Therefore, operational noise impacts under the Reduced Density Alternative would be less than those associated with the Proposed Project, although impacts under both the Proposed Project and this alternative would be less than significant.

Population, Housing and Employment

Under the Reduced Density Alternative, the land uses developed on the project site would be the same as those described under the Proposed Project. However, overall development on the project site would be reduced by 25 percent for a total of approximately 199,842 square feet. As described in Section IV.I. Population, Housing and Employment of this Draft EIR, the Applicant has a vested right to construct the 134-unit residential building on the eastern portion of the project site. Thus, the Reduced Density Alternative would result in a net increase of 61 dwelling units, including joint live/work units. The Proposed Project is estimated to introduce approximately 374 new permanent residents to the project area. Under the Reduced Density Alternative, the project would introduce approximately 181 new permanent residents to the project site; this is 193 fewer residents than would be generated by the Proposed Project.[1,2] Although both the Proposed Project and the Reduced Density Alternative would be within SCAG's population and housing projections for the Los Angeles subregion, the Reduced Density Alternative would develop fewer residential units than the Proposed Project. Similar to the Proposed Project, with the exception of the proposed joint live/work units, the Reduced Density Alternative does not include any commercial component. Therefore, the Reduced Density Alternative is not expected to generate a substantial amount of on-site employment. As the Reduced Density Alternative would result in the removal of approximately 24,000 square feet of commercial development that currently provides employment for approximately 54 persons, buildout of the Reduced Density Alternative could result in a net job loss of up to 54 jobs on the project site. Similar to the Proposed Project, despite the decrease in employment associated with the implementation of the Reduced Density Alternative, SCAG and the City anticipate employment growth in the immediate project area and the Los Angeles Subregion, thereby providing jobs for the new residents generated by the Reduced Density Alternative. Therefore, impacts with respect to population, housing and employment under the Reduced Density Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Public Services

Fire Protection

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 dwelling units under the Proposed Project. As such, on-site population and density would be reduced under this alternative, thus resulting in a reduction in the number of expected service calls. However, while the size of the development would be reduced, the type and frequency of fire protection services required is based on uses included in the project and would be the same as the Proposed Project. Therefore, as land uses would be the same under this alternative as under the Proposed Project, impacts

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[1] *61 residential units x 2.967 residents per unit (City's current household demographics) = 181 residents.*

[2] *State of California, Department of Finance, E-5 City/County Population and Housing Estimates, 2008, Revised 2001-2007, with 2000 Benchmark, website: http://www.dof.ca.gov/HTML/DEMOGRAP/ReportsPapers/Estimates/E5/E5-06/E-5text2.asp, January 8, 2009.*

on fire protection services under the Reduced Density Alternative, although incrementally reduced, would be similar to those associated with the Proposed Project and less than significant.

Similar to the Proposed Project, the Reduced Density Alternative is not expected to significantly impact any of the seven study intersections (see subheading Traffic, Transportation, and Parking, below). Therefore, impacts under the Reduced Density Alternative related to emergency response time would be less than significant, similar to the Proposed Project.

Police Protection

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 dwelling units under the Proposed Project. As described above, this alternative would introduce approximately 181 new permanent residents to the project area, approximately 193 fewer residents than would be generated by the Proposed Project. As such, on-site daytime, evening, and permanent population would be reduced compared to the Proposed Project. Because of the reduced on-site population, the type and frequency of police protection services required to serve the project site would be reduced compared to the Proposed Project. Therefore, impacts on police protection services under the Reduced Density Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Schools

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, compared to the 126 dwelling units under the Proposed Project. As discussed in Section IV.J.3 Public Services of this Draft EIR, the Proposed Project is estimated to generate a net total of approximately 52 students, whereas the Reduced Density Alternative would generate a net total of approximately 25 students (see Table VI-1, Estimated Reduced Density Alternative Estimated Student Generation, below). Therefore, impacts on schools under the Reduced Density Alternative would be less than those associated with the Proposed Project, although either scenario would result in less than significant impacts.

Recreation and Parks

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 dwelling units described under the Proposed Project. As fewer dwelling units would be developed under this alternative, there would be fewer residents introduced into the project area, lessening the demand on parks and recreational facilities as compared to the Proposed Project. Park fees would also be lower than the Proposed Project, based on the reduction in the number of dwelling units. Therefore, impacts on parks and recreation services under the Reduced Density Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Table VI-1
Reduced Density Alternative Estimated Student Generation

Land Use	Size	School Type	Student Generation Factor[a]	Total Students Generated
Proposed Project				
Residential/Live/Work Units	260 units	Elementary School (K-5)	0.2042	53
		Middle School (6-8)	0.0988	26
		High School (9-12)	0.0995	26
			Proposed Project Subtotal	*105*
Less Baseline Conditions				
Existing Retail	24,000 sf	Elementary School (K-5)	0.0000149	0
		Middle School (6-8)	0.0000069	0
		High School (9-12)	0.0000067	0
Previously-Approved Residential Building	134 units	Elementary School (K-5)	0.2042	27
		Middle School (6-8)	0.0988	13
		High School (9-12)	0.0995	13
			Baseline Conditions Subtotal	*53*
			Proposed Project Net Total	**52**
Reduced Density Alternative				
Residential/Live/Work Units	195 units	Elementary School (K-5)	0.2042	40
		Middle School (6-8)	0.0988	19
		High School (9-12)	0.0995	19
			Reduced Density Alternative Subtotal	*78*
			Baseline Conditions Subtotal	*53*
			Reduced Density Alternative Net Total	**25**

Note: The number of students has been rounded to the nearest whole number.
[a] *Los Angeles Unified School District, Student Generation Rate Calculation, August 2006.*
Source (table): Christopher A. Joseph & Associates, February 2009.

Libraries

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 units described under the Proposed Project. As such, this alternative would generate approximately 193 fewer residents than would the Proposed Project. As fewer residents would be generated, there would be less of a demand on library services than under the Proposed Project. Therefore, impacts on libraries under the Reduced Density Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Traffic, Transportation, and Parking

The following analysis is based on the *Proposed Residential Development on Manchester Avenue, West of Lincoln Boulevard – Alternatives Traffic Analysis*, prepared by Crain & Associates, February 5, 2009, which is included as Appendix L to this Draft EIR.

Under the Reduced Density Alternative, the project site would be developed with 61 dwelling units, including joint live/work units, rather than the 126 dwelling units under the Proposed Project, and the overall size of the project would be reduced by 25 percent. As fewer dwelling units would be developed under this alternative, fewer daily vehicle trips to and from the project site would be generated than under the Proposed Project. As shown in Table VI-2, Reduced Density Alternative Trip Generation, the Proposed Project is estimated to result in a net reduction of 307 daily trips from baseline conditions, whereas the Reduced Density Alternative would result in a net reduction of 698 daily trips. Therefore,

Table VI-2
Reduced Density Alternative Trip Generation[a]

Land Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Existing Site Trips								
Specialty Retail	24,000 sf	1,064	17	12	29	53	67	120
Proposed Project Trips								
Apartments	260 du	1,713	26	105	131	118	64	182
Previously-Approved Apartments	(134) du	(956)	(14)	(55)	(69)	(61)	(33)	(94)
Total Area Intersection Trips		**(307)**	**(5)**	**38**	**33**	**4**	**(36)**	**(32)**
Reduced Density Alternative Trips								
Apartments	195 du	1,322	20	79	99	89	48	137
Previously-Approved Apartments	(134) du	(956)	(14)	(55)	(69)	(61)	(33)	(94)
Existing Specialty Retail to be removed	(24,000) sf	(1,064)	(17)	(12)	(29)	(53)	(67)	(120)
Total Area Intersection Trips		**(698)**	**(11)**	**12**	**1**	**(25)**	**(52)**	**(77)**

[a] *For a conservative approach the Reduced Density Alternative takes the same approach as the Proposed Project.*
Source: Crain & Associates, February 5, 2009.

impacts related to operational project trips under the Reduced Density Alternative would be less than significant and less than the impacts associated with the Proposed Project.

As shown in Table VI-3, Critical Movement Analysis (CMA) Summary Future (2012) Traffic Conditions – Without and With Reduced Density Alternative, this alternative would not significantly impact any of the study intersections, similar to the Proposed Project, and in fact would result in reduced impacts on the study intersections when compared to the Proposed Project. Therefore, impacts under the Reduced Density Alternative with respect to traffic would be less than significant and less than the impacts associated with the Proposed Project.

Table VI-3
Critical Movement Analysis (CMA) Summary
Future (2012) Traffic Conditions – Without and With Reduced Density Alternative

No.	Intersection	Peak Hour	Future (2012) Without Project		Future (2012) With Proposed Project			Future (2012) With Reduced Density Alternative		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
1.	83rd Street and Lincoln Boulevard	AM	1.011	F	1.015	F	0.004	1.013	F	0.002
		PM	0.826	D	0.825	D	-0.001	0.822	D	-0.004
2.	83rd Street and Rayford Drive	AM	0.486	A	0.490	A	0.004	0.488	A	0.002
		PM	0.433	A	0.429	A	-0.004	0.427	A	-0.006
3.	Manchester Avenue and Pershing Drive	AM	0.365	A	0.366	A	0.001	0.366	A	0.001
		PM	0.455	A	0.455	A	0.000	0.454	A	-0.001
4.	Manchester Avenue and Rayford Drive	AM	0.334	A	0.338	A	0.004	0.335	A	0.001
		PM	0.243	A	0.239	A	-0.004	0.237	A	-0.006
5.	Manchester Avenue and Lincoln Boulevard	AM	0.700	B	0.707	C	0.007	0.702	C	0.002
		PM	0.813	D	0.808	D	-0.005	0.794	C	-0.019
6.	Manchester Avenue and Loyola Boulevard	AM	0.350	A	0.350	A	0.000	0.350	A	0.000
		PM	0.444	A	0.445	A	0.001	0.441	A	-0.003
7.	Loyola Boulevard and Lincoln Boulevard	AM	0.293	A	0.294	A	0.001	0.293	A	0.000
		PM	0.490	A	0.488	A	-0.002	0.487	A	-0.003

Source: Crain & Associates, January 2009.
Source (table): Christopher A. Joseph & Associates, February 5, 2009.

As shown in Table VI-4, Residential Street Impact Analysis-Reduced Density Alternative, this alternative would not result in a significant impact on the study residential street segment. Further, impacts under this alternative would be reduced compared to the Proposed Project. Therefore, impacts under the Reduced Density Alternative with respect to residential streets would be less than significant and less than the Proposed Project.

Table VI-4
Residential Street Impact Analysis
Reduced Density Alternative

Street Segment	Daily Volume				
	Existing (2008)	Without Project (2012)	Project Traffic	With Project (2012)	Percent Project Traffic
Proposed Project					
Rayford Drive south of 85th Street	2,350	2,652	-12	2,640	-0.5%
Reduced Density Alternative					
Rayford Drive south of 85th Street	2,350	2,630	-52	2,578	-2.02%

Source: Crain & Associates, January 2009.
Source (table): Christopher A. Joseph & Associates, February 5, 2009.

Utilities and Services

Water

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 dwelling units under the Proposed Project. As discussed in Section IV.L.1 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 21,804 gallons of water per day, whereas the Reduced Density Alternative would consume approximately 9,407 gallons of water per day (see Table VI-5, Estimated Reduced Density Alternative Water Consumption, below). Therefore, impacts on water services under the Reduced Density Alternative would be less than those associated with the Proposed Project, although either scenario would result in less than significant impacts.

Table VI-5
Estimated Reduced Density Alternative Water Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	189 gallons/unit/day	49,140
Multi-Purpose/Gym	1,400 sf	320 gallons/ 1,000 sf/day	448
		Proposed Project Subtotal	*49,588*
Less Baseline Conditions			
Existing Retail	24,000 sf	102.4 gallons/1,000 sf/day	2,458
Previously-Approved Residential Building	134 units	189 gallons/unit/day	25,326
		Baseline Conditions Subtotal	*27,784*
		Proposed Project Net Total	**21,804**
Reduced Density Alternative			
Residential/Live/Work Units	195 units	189 gallons/unit/day	36,855
Multi-Purpose/Gym	1,050 sf	320 gallons/ 1,000 sf/day	336
		Reduced Density Alternative Subtotal	*37,191*
		Baseline Conditions Subtotal	*27,784*
		Reduced Density Alternative Net Total	**9,407**

Note: sf = square feet, du = dwelling units

[a] *Assumes two bedrooms for all units.*

[b] *Calculated utilizing the "gymnasium" consumption rate.*

Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002; calculated as 118% of wastewater generation for residential uses and 128% for non-residential uses.

Source (table): Christopher A. Joseph & Associates, February 2009.

Sewer

Under the Reduced Density Alternative, the overall size of the project site would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 dwelling units under the Proposed Project. As discussed in Section IV.L.2 Utilities of this Draft EIR, the Proposed Project is estimated to generate approximately 18,590 gallons of wastewater per day, whereas the Reduced Density Alternative would generate approximately 8,103 gallons per day (see Table VI-6, Estimated Reduced Density Alternative Wastewater Generation, below). Therefore, impacts on wastewater services under the Reduced Density Alternative would be less than significant and less than impacts associated with the Proposed Project.

Table VI-6
Estimated Reduced Density Alternative Wastewater Generation

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	160 gallons/unit/day[a]	41,600
Multi-Purpose/Gym	1,400 sf	250 gallons/1,000 sf/day[b]	350
		Proposed Project Subtotal	*41,950*
Less Baseline Conditions			
Existing Retail	24,000 sf	80 gallons/1,000 sf/day	1,920
Previously-Approved Residential Building	134 units	160 gallons/unit/day[a]	21,440
		Baseline Conditions Subtotal	*23,360*
		Proposed Project Net Total	**18,590**
Reduced Density Alternative			
Residential/Live/Work Units	195 units	160 gallons/unit/day	31,200
Multi-Purpose/Gym	1,050 sf	250 gallons/ 1,000 sf/day	263
		Reduced Density Alternative Subtotal	*31,463*
		Baseline Conditions Subtotal	*23,360*
		Reduced Density Alternative Net Total	**8,103**

Note: sf = square feet, du = dwelling units
[a] *Assumes two bedrooms for all units.*
[b] *Calculated utilizing the "gymnasium" consumption rate.*
Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.
Source (table): Christopher A. Joseph & Associates, February 2009..

Solid Waste

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 dwelling units under the Proposed Project. As discussed in Section IV.L.3 Utilities of this Draft EIR, the

Proposed Project is estimated to generate approximately 384 pounds of solid waste per day, whereas the Reduced Density Alternative would generate approximately 124 pounds of solid waste per day (see Table VI-7, Estimated Reduced Density Alternative Solid Waste Generation, below). Therefore, impacts on solid waste services under the Reduced Density Alternative would be less than significant and less than impacts associated with the Proposed Project.

Table VI-7
Estimated Reduced Density Alternative Solid Waste Generation

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	4 pounds/unit/day	1,040
		Proposed Project Subtotal	*1,040*
Less Baseline Conditions			
Existing Retail	24,000 sf	5 pounds/1,000 sf/day	120
Previously-Approved Residential Building	134 units	4 pounds/unit/day	536
		Baseline Conditions Subtotal	*656*
		Proposed Project Net Total	**384**
Reduced Density Alternative			
Residential/Live/Work Units	195 units	4 pounds/unit/day	780
		Reduced Density Alternative Subtotal	*780*
		Baseline Conditions Subtotal	*656*
		Reduced Density Alternative Net Total	**124**

Note: sf = square feet, du = dwelling units
Source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation", 1981.
Source (table): Christopher A. Joseph & Associates, February 2009.

Electricity

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 dwelling units under the Proposed Project. As discussed in Section IV.L.4 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 1,055 KW-Hours of electricity per day, whereas the Reduced Density Alternative would consume approximately 53 KW-Hours of electricity per day (see Table VI-8, Estimated Reduced Density Alternative Electricity Consumption, below). Therefore, impacts on electricity services under the Reduced Density Alternative would be less than significant and less than impacts associated with the Proposed Project.

Table VI-8
Estimated Reduced Density Alternative Electricity Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	15.42 KW-Hours/unit/day	4,009
		Proposed Project Subtotal	*4,009*
Less Baseline Conditions			
Existing Retail	24,000 sf	37 KW-Hours/1,000 sf/day	888
Previously-Approved Residential Building	134 units	15.42 KW-Hours/unit/day	2,066
		Baseline Conditions Subtotal	*2,954*
		Proposed Project Net Total	**1,055**
Reduced Density Alternative			
Residential/Live/Work Units	195 units	15.42 KW-Hours/unit/day	3,007
		Reduced Density Alternative Subtotal	*3,007*
		Baseline Conditions Subtotal	*2,954*
		Reduced Density Alternative Net Total	**53**

Note: sf = square feet, du = dwelling units
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.
Source (table): Christopher A. Joseph & Associates, February 2009.

Natural Gas

Under the Reduced Density Alternative, the overall size of the project would be reduced by 25 percent and would result in a net increase of 61 dwelling units, including joint live/work units, rather than the 126 dwelling units under the Proposed Project. As discussed in Section IV.L.5 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 14,446 cubic feet of natural gas per day, whereas the Reduced Density Alternative would consume approximately 5,756 cubic feet of natural gas per day (see Table VI-9, Estimated Reduced Density Alternative Natural Gas Consumption, below). Therefore, impacts on natural gas services under the Reduced Density Alternative would be less than significant and less than impacts associated with the Proposed Project.

Table VI-9
Estimated Reduced Density Alternative Natural Gas Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	133.7 cf/unit/day	34,762
		Proposed Project Subtotal	*34,762*

Table VI-9
Estimated Reduced Density Alternative Natural Gas Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Less Baseline Conditions			
Existing Retail	24,000 sf	100 cf/1,000 sf/day	2,400
Previously-Approved Residential Building	134 units	133.7 cf/unit/day	17,916
		Baseline Conditions Subtotal	*20,316*
		Proposed Project Net Total	**14,446**
Reduced Density Alternative			
Residential/Live/Work Units	195 units	133.7 cf/unit/day	26,072
		Reduced Density Alternative Subtotal	*26,072*
		Baseline Conditions Subtotal	*20,316*
		Reduced Density Alternative Net Total	**5,756**

Note: sf = square feet, du = dwelling units
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.
Source (table): Christopher A. Joseph & Associates, February 2009.

Relationship to Project Objectives

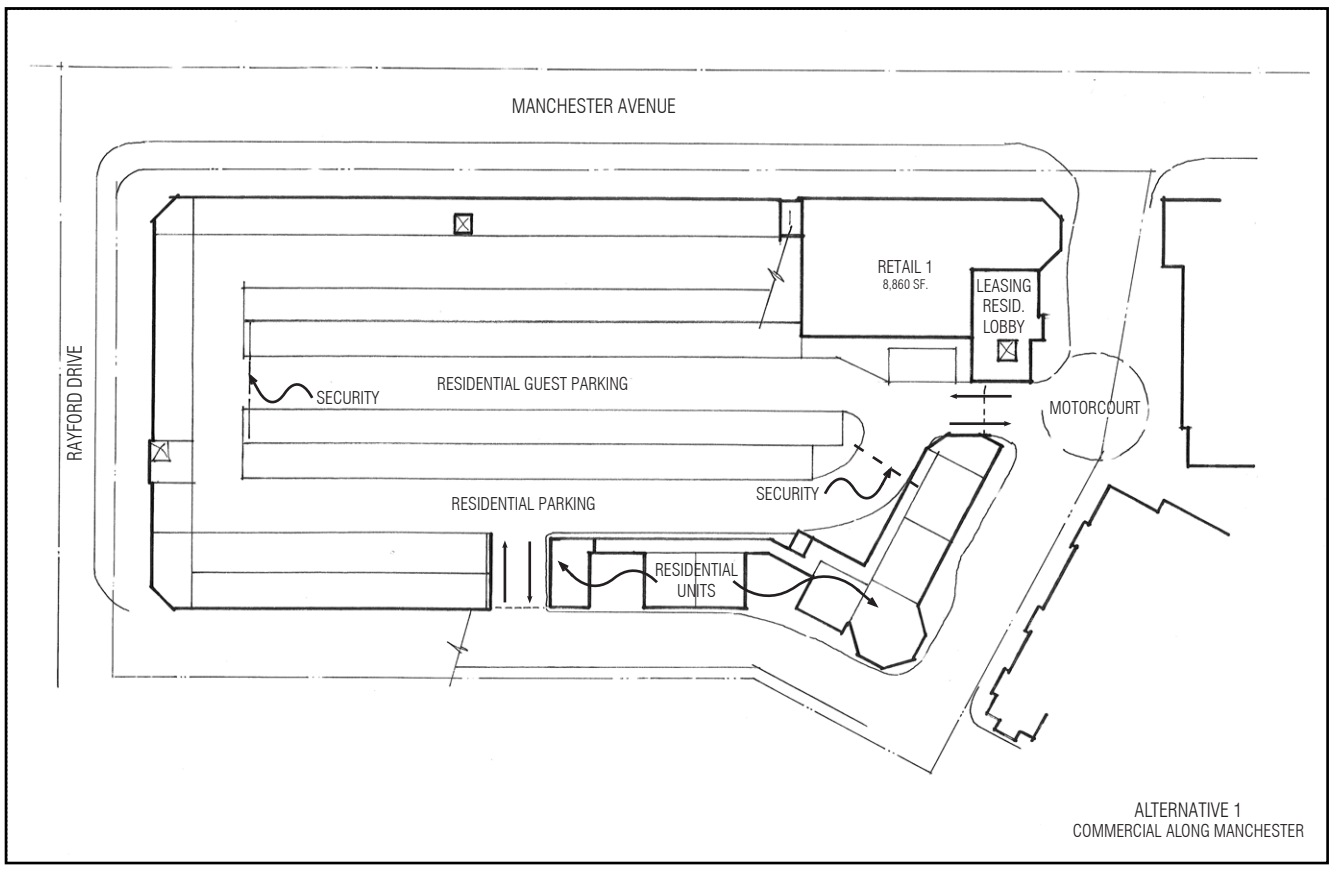
The Reduced Density Alternative would satisfy all of the project objectives.

Reduction of Significant Project Impacts

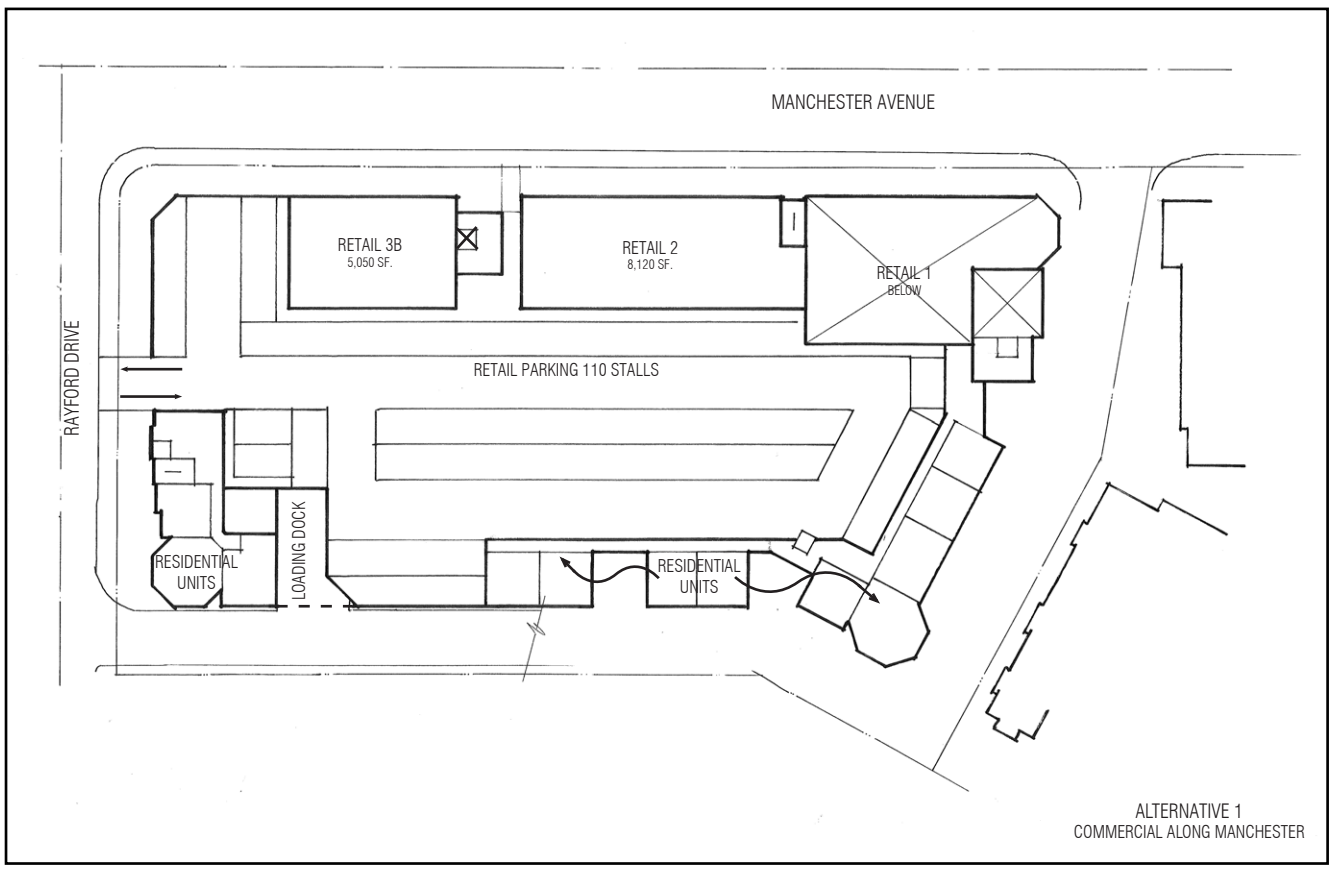
The Reduced Density Alternative would generally result in environmental impacts similar to the Proposed Project. However, the Reduced Density Alternative would not avoid the significant and unavoidable impacts of the Proposed Project with respect to Construction Noise.

C. MIXED-USE (RETAIL/RESIDENTIAL) ALTERNATIVE

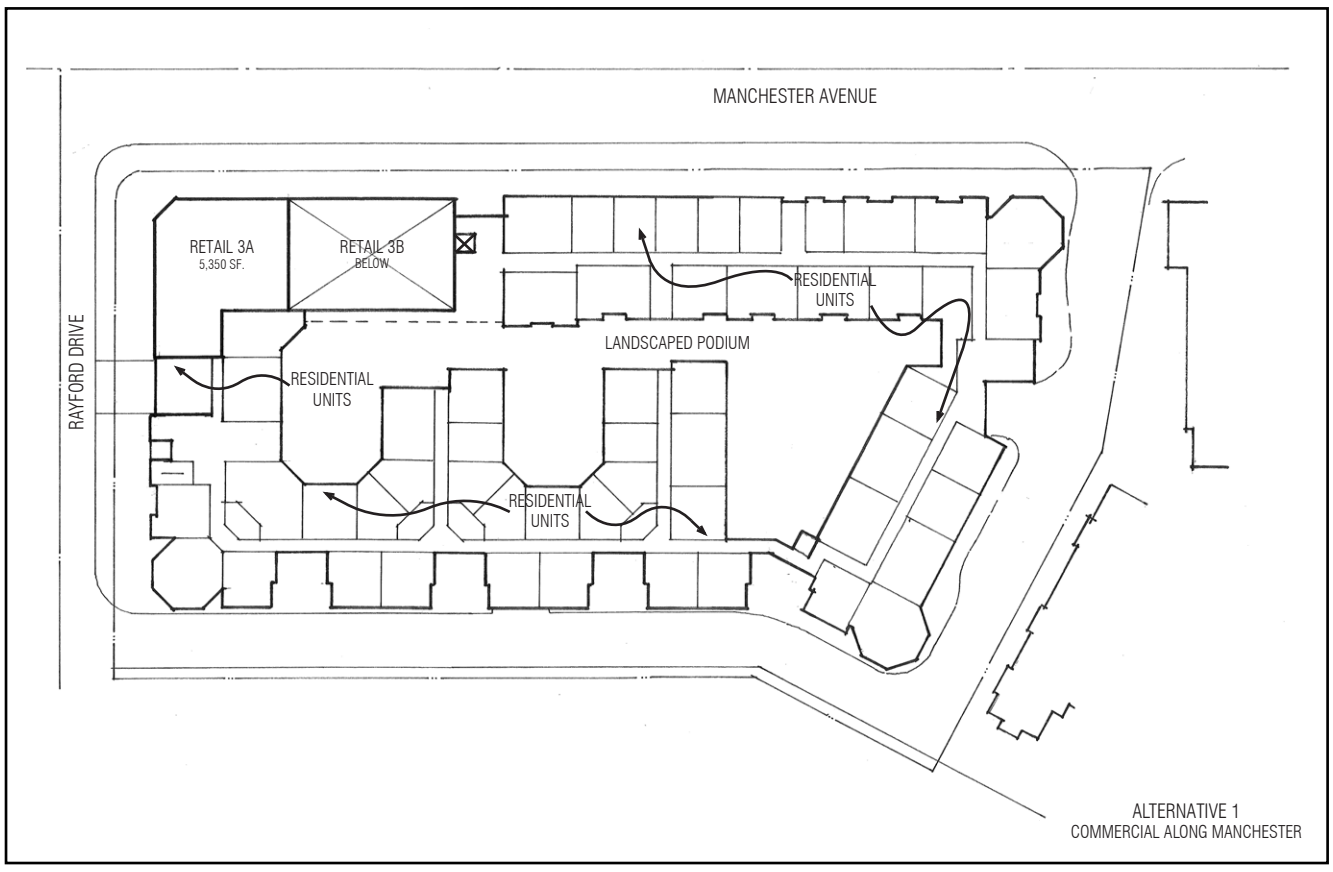
Under the Mixed-Use (Retail/Residential) Alternative, the project would be developed in a manner that is similar to the Proposed Project. However, as shown in Figure VI-1, Mixed-Use (Retail/Residential) Alternative Conceptual Site Plan, under this alternative the space proposed for the 16 joint live/work units fronting Manchester Avenue would be replaced with commercial/retail uses. Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed with a mixed-use structure totaling approximately 255,652 square feet including 222 dwelling units (totaling approximately 217,156 square feet), approximately 42,500 square feet of common area, and approximately 27,380 square feet of commercial/retail uses fronting Manchester Avenue. The parking area would be constructed directly behind the commercial/retail uses with additional parking below the residential units. Parking would be provided in three levels (two above ground and one subterranean) containing 516 parking spaces. The floor to area ratio under the Mixed-Use (Retail/Residential) Alternative would be 1.94:1. All other



LEVEL 1 (MOTORCOURT LEVEL)



LEVEL 2



LEVEL 3 (PODIUM LEVEL)

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2009.

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Environmental Planning and Research

Figure VI-1
Mixed-Use/Retail/Residential
Alternative Conceptual Site Plan

aspects of the project, including building heights, would be the same as described under the Proposed Project. As described in Section III. Project Description, the Applicant has a vested right to construct 134 previously-approved dwelling units on the eastern portion of the project site. Because 134 of the 222 proposed dwelling units have already been approved and analyzed, the Mixed-Use (Retail/Residential) Alternative would result in a net increase of 88 dwelling units.

The Mixed-Use (Retail/Residential) Alternative would include ground floor retail uses, which would be compatible with land use plans and policies including the Community Plan and the Loyola Village CDO. This alternative analyzes impacts of the project with a reduced number of residential units and ground floor commercial/retail uses.

Aesthetics

Under the Mixed-Use (Retail/Residential) Alternative, the project would be developed similar to the Proposed Project. However, under this alternative, the space proposed for the 16 joint live/work units fronting Manchester Avenue would be replaced with commercial/retail uses. The project under this alternative would include 222 dwelling units and approximately 27,380 square feet of commercial/retail uses. Building heights under the Mixed-Use (Retail/Residential) Alternative would be the same as described under the Proposed Project. Just as with the Proposed Project, the Mixed-Use (Retail/Residential) Alternative would not affect views from a designated scenic highway, corridor, or parkway; neither would it substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings. While there are two native Coast Live Oaks on the project site, (protected under Los Angeles Municipal Ordinance 177,404) neither tree is in an aesthetically pleasing condition (refer to Appendix J, *Playa Manchester Project Tree Report*, dated August 2009) and as they are in planters behind the existing retail development they cannot be seen from any of the surrounding areas. Therefore, these trees do not constitute a scenic resource. Therefore, impacts under the Mixed-Use (Retail/Residential) Alternative with respect to scenic resources would be similar to those associated with the Proposed Project.

Similar to the Proposed Project, building heights and massing under the Mixed-Use (Retail/Residential) Alternative would be larger than what currently exists on-site. As such, views of the project site would be available from more off-site locations than at present, same as the Proposed Project. Therefore, impacts under the Mixed-Use (Retail/Residential) Alternative with respect to views and visual character of the project site would be similar to those associated with the Proposed Project and less than significant.

The western portion of the project site is currently developed with 24,000 square feet of commercial uses as well as associated surface parking. This surface parking is a source of glare from sunlight reflecting off of car windshields. The Mixed-Use (Retail/Residential) Alternative would eliminate the existing source of glare from windshields of parked cars by moving all parking to the enclosed parking garage. Similar to the Proposed Project, the Mixed-Use (Retail/Residential) Alternative would utilize glass with low reflectivity or non-glare coating, thus reducing the net potential for glare generation. Additionally, lighting included in the project design under this alternative would be shielded and focused on the project site or located indoors, similar to the Proposed Project. Therefore, light and glare impacts under the

Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project and less than significant.

Air Quality

Under the Mixed-Use (Retail/Residential) Alternative, the project would be developed in a manner that is similar to the Proposed Project. However, under this alternative, the space proposed for the 16 joint live/work units would be replaced with commercial/retail uses. The project under this alternative would develop 222 dwelling units and approximately 27,380 square feet of commercial/retail uses.

Construction Impacts

Construction activities performed during development of this alternative would be similar to the Proposed Project. Building heights and square footage of the structure developed under this alternative would generally be similar to those of the Proposed Project. As such, the duration of construction activities under this alternative would be similar to the Proposed Project. Therefore, short-term construction air quality impacts under the Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project and less than significant.

Operational Impacts

Whereas the Proposed Project would develop 260 residential units, including 16 joint live/work units, the Mixed-Use (Retail/Residential) Alternative would develop 222 dwelling units and approximately 27,380 square feet of commercial/retail uses. As such, fewer daily vehicle trips for the residential uses would occur under this alternative as compared to the Proposed Project. However, the Mixed-Use (Retail/Residential) Alternative would include 27,380 square feet of new commercial/retail floor area. Commercial/retail uses generate more daily vehicle trips than residential uses (see subheading Traffic, Transportation, and Parking, below). This is because more people travel to commercial/retail locations more times throughout the day than to residences. Therefore, operational air quality impacts related to vehicle emissions would be greater under the Mixed-Use (Retail/Residential) Alternative than under the Proposed Project.

The Mixed-Use (Retail/Residential) Alternative would involve development of fewer dwelling units than the Proposed Project. As such, it would generate fewer greenhouse gas emissions from natural gas and electricity consumption than would the Proposed Project. However, the increase in vehicle trips would result in an overall increase in greenhouse gas emissions when compared to the Proposed Project. Therefore, operational air quality impacts related to greenhouse gas emissions under the Mixed-Use (Retail/Residential) Alternative would be greater than those associated with the Proposed Project.

Hazards and Hazardous Materials

Under the Mixed-Use (Retail/Residential) Alternative, the project would be developed in a manner that is similar to the Proposed Project. However, under this alternative, the space proposed for the 16 joint live/work units would be replaced with commercial/retail uses. The project under this alternative would include 222 dwelling units and approximately 27,380 square feet of commercial/retail uses. Under this

alternative, excavation would occur for building foundations and the subterranean parking garage. As such, any storage tanks uncovered during excavation activities would be removed from the project site. Therefore, impacts with respect to storage tanks under the Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project and less than significant. As existing structures would be demolished under this alternative, it is possible that ACMs and LBP, should they be present, could be released into the environment. However, similar to the Proposed Project, demolition under this alternative would be conducted in compliance with applicable regulations governing safe removal and disposal of ACMs and LBP. Therefore, impacts under the Mixed-Use (Retail/Residential) Alternative with respect to ACMs and LBP would be similar to those associated with the Proposed Project and less than significant. Additionally, it is possible that PCB-containing fixtures may be present on the project site; however, mitigation measures would be required to ensure safe removal of any PCBs encountered. Therefore, impacts with respect to PCBs under the Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project and less than significant.

As with the Proposed Project, under the Mixed-Use (Retail/Residential) Alternative, the project site would be located within a City-designated Methane Buffer Zone. The project under this alternative would be required to comply with regulations under LAMC Division 71, same as the Proposed Project. Therefore, impacts with respect to methane gas would be similar under the Mixed-Use (Retail/Residential) Alternative to those associated with the Proposed Project and less than significant. Under this alternative, the project site would be in proximity to City-designated disaster routes (Manchester Avenue and Lincoln Boulevard) as well as a City of Los Angeles Maintenance Warehouse, similar to the Proposed Project. However, project development under this alternative would neither impede access to or from Manchester Avenue or Lincoln Boulevard, nor would it interfere with operation of the City Maintenance Warehouse. Therefore, impacts related to emergency response plans under the Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project and less than significant.

Hydrology and Water Quality

The Mixed-Use (Retail/Residential) Alternative would be developed in a manner that is similar to the Proposed Project. However, under this alternative, the space proposed for the 16 joint live/work units would be replaced with commercial/retail uses. Under this alternative, the project site would be developed with 222 dwelling units and approximately 27,380 square feet of commercial/retail uses. The project site is not at risk for impacts associated with tsunamis, seiches, or flooding. Under the Mixed-Use (Retail/Residential) Alternative, construction activities would include demolition and excavation, similar to the Proposed Project. Per the Los Angeles County SUSMP, implementation of Best Management Practices would be required for development of this alternative. Therefore, short-term construction impacts on water quality under the Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project and less than significant. Additionally, mitigation measures would be implemented under this alternative to further reduce impacts on water quality. Therefore, operational water quality impacts under the Mixed-Use (Retail/Residential) Alternative would be less than significant, similar to the Proposed Project.

Land Use and Planning

The Mixed-Use (Retail/Residential) Alternative would be developed in a manner that is similar to the Proposed Project. However, under this alternative, the space proposed for the 16 joint live/work units would be replaced with commercial/retail uses. Under this alternative, the project site would be developed with 222 dwelling units and approximately 27,380 square feet of commercial/retail uses. Similar to the Proposed Project, this alternative would include a Discretionary Action to change the zoning on the western portion of the project site from [Q]C4-1-CDO to (T)(Q)RAS4-1-CDO.

The Mixed-Use (Retail/Residential) Alternative would include design elements to encourage pedestrianism and allow access from Manchester Avenue as well as reduce the need for automobiles. Particularly, this alternative would be consistent with the following policies[3]:

- Policy 2.3.1 of the General Plan Housing Element: This alternative would provide high-density residential uses and retail uses in proximity to each other as well as major thoroughfares with access to several transit lines, including the City of Santa Monica Big Blue Bus Line 3, which provides access to the Metro Green Line, and Metro Bus Line 115, which provides daily service between Playa del Rey and the City of Norwalk. Thereby reducing the number of auto trips and vehicle miles traveled, which would serve to reduce traffic congestion and air pollution.

- Policy 1-4.4 of the Westchester-Playa del Rey Community Plan: This alternative would include development of a mixed-use structure located near major thoroughfares with access to transit lines. Additionally, the project site is located near the Loyola Village commercial center and directly adjacent to the Playa del Oro development, which will include ground floor retail uses. Therefore, this alternative would encourage mixed-use development near commercial zones, pedestrian oriented areas, and transit corridors.

- Guideline 2, Standards 2a and 2d of the Loyola Village CDO: Similar to the Proposed Project, this alternative would provide a parking area at the podium level with additional subterranean parking levels. Vehicular access to the parking area would be provided via an existing driveway on Manchester Avenue which would be shared by the proposed structure and the Playa del Oro development. Additional access would be provided via an existing driveway on Rayford Drive; no new driveways would be constructed along Manchester Avenue, thereby maintaining the walkability of Manchester Avenue.

- Standard 7a of the Loyola Village CDO: Similar to the Proposed Project, this alternative would locate the structure's main entrance along Manchester Avenue. Additionally, the retail uses on the ground floor would include direct public access from Manchester Avenue.

[3] *See section IV.G. Land Use and Planning, for a detailed list of regional and local plan policies applicable to the project site.*

As shown, design elements under this alternative are consistent with the goals and policies of regional and local plans, including the Community Plan and the Loyola Village CDO. Therefore, similar to the Proposed Project, the Mixed-Use (Retail/Residential) Alternative would be consistent with and would implement regional and local plans and policies. Further, as with the Proposed Project, this alternative would be compatible with surrounding land uses. Therefore, impacts with respect to land use compatibility under the Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project and less than significant.

Noise

Under the Mixed-Use (Retail/Residential) Alternative, the project would be developed similar to the Proposed Project. However, under this alternative, the space proposed for the 16 joint live/work units would be replaced with commercial/retail uses. This alternative would develop 222 dwelling units and approximately 27,380 square feet of commercial/retail uses.

Construction Impacts

The Mixed-Use (Retail/Residential) Alternative would generally be the same size as the Proposed Project. As such, construction activities associated with development of this alternative would be of similar duration and intensity as with the Proposed Project. Therefore, short-term construction-related noise impacts under the Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project. This alternative would not avoid the significant and unavoidable impacts resulting from construction noise.

Operational Impacts

As fewer residential units would be developed under this alternative (222 dwelling units compared to the 260 dwelling units under the Proposed Project), fewer vehicle trips would be generated by the project residents, which may result in a decrease in operational noise compared to the Proposed Project. However, 27,380 square feet of commercial/retail uses would also be developed under this alternative. Commercial and retail uses generate more vehicle trips than do residential uses. As such, this alternative would result in an overall increase in vehicle trips when compared to the Proposed Project (see subheading Traffic, Transportation, and Parking, below). Therefore, operational noise impacts under the Mixed-Use (Retail/Residential) Alternative would be greater than those associated with the Proposed Project.

Population, Housing, and Employment

Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed in a manner that is similar to the Proposed Project. However, under this alternative, 222 dwelling units would be developed and the space proposed for the 16 joint live/work units would be developed with approximately 27,380 square feet of commercial/retail uses. As described in Section IV.I. Population, Housing, and Employment of this Draft EIR, the Applicant has a vested right to construct the 134-unit residential building on the eastern portion of the project site. Thus, the Proposed Project would result in a net increase of 126 dwelling units and is estimated to generate approximately 374 new residents.

Development of the Mixed-Use (Retail/Residential) Alternative would result in a net increase of 88 residential units. The 88 units under this alternative would be estimated to generate approximately 261 new permanent residents at the project site; this is 113 fewer residents than would be generated by the Proposed Project.[4][5] Similar to the Proposed Project, this alternative would be within SCAG's population and housing projections for the Los Angeles subregion. However, the Mixed-Use (Retail/Residential) Alternative would develop fewer residential units than the Proposed Project. Therefore, population and housing impacts under the Mixed-Use (Retail/Residential) Alternative would be less than significant and less than the impacts associated with the Proposed Project.

As shown in Table VI-10, Estimated Employment for the Mixed-Use (Retail/Residential) Alternative, this alternative would provide employment for approximately 61 people. This represents a net increase of seven employees over existing uses. As the Proposed Project does not include a commercial/retail component, the 61 employees estimated to be generated by the Mixed-Use (Retail/Residential) Alternative is also the net increase in employees over the Proposed Project.

Table VI-10
Estimated Employment for the Mixed-Use (Retail/Residential) Alternative

Use	Size (sf)	Employee Generation Factor[a]	Total Employees
Existing Uses			
Retail	24,000	0.0022371 employees/sf	54
		Existing Uses Total	***54***
Mixed Use (Retail/Residential(Alternative			
Commercial/Retail	27,380	0.0022371 employees/sf	61
		Mixed Use (Retail/Residential) Alternative Total	***61***
		Net Increase in Employees	**7**

[a] *Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*
Source (table): Christopher A. Joseph & Associates, January 2009.

As further discussed in Section IV.I. Population, Housing, and Employment of this Draft EIR, SCAG has forecasted that the total employment level for Census Tract 2766.02 will increase by approximately 456 employees between 2000 and 2015. The net number of employees generated by development of this alternative represents approximately 1.5 percent of the projected employment for the project area. As such, this alternative would also be within SCAG's employment projection. Whereas the Proposed Project would result in a net decrease in employees, this alternative represents a net increase in employees at the project site, which could be an economic benefit. Nonetheless, neither the Proposed Project nor this alternative would exceed employment projections for the project area. Therefore, employment impacts

[4] *88 residential units x 2.967 residents per unit (City's current household demographics) = 261 residents.*

[5] *Op. cit.*

under the Mixed-Use (Retail/Residential) Alternative would be similar to those associated with the Proposed Project and less than significant.

Public Services

Fire Protection

Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed in a manner that is similar to the Proposed Project. However, this alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units that would be added under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As such, on-site population would be reduced under this alternative when compared to the Proposed Project. However, the type and frequency of fire protection services required is based on project land uses. The project under this alternative would be slightly less dense than development of the Proposed Project. Therefore, impacts on fire protection services under the Mixed-Use (Retail/Residential) Alternative would be less than those associated with the Proposed Project, although either scenario would result in less than significant impacts.

Police Protection

Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed in a manner that is similar to the Proposed Project. However, this alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units that would be added under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As described above, this alternative would introduce approximately 261 new permanent residents to the project area, approximately 113 fewer residents than would be generated by the Proposed Project. Development of this alternative includes commercial/retail uses, which are estimated to generate approximately seven net new employees. The overall population under this alternative, however, would be lower than that of the Proposed Project. Therefore, impacts on police protection services under the Mixed-Use (Retail/Residential) Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Schools

Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed in a manner that is similar to the Proposed Project. However, this alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units that would be added under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As discussed in Section IV.J.3 Public Services of this Draft EIR, the Proposed Project is estimated to generate approximately 52 students, whereas this alternative would generate approximately 36 students (see Table VI-11, Mixed-Use (Retail/Residential) Alternative Estimated Student Generation, below). Further, payment of school facilities fees would be less under this alternative than the Proposed Project. Therefore, impacts on schools under the Mixed-Use (Retail/Residential) Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Table VI-11
Mixed-Use (Retail/Residential) Alternative Estimated Student Generation

Land Use	Size	School Type	Student Generation Factor[a]	Total Students Generated
Proposed Project				
Residential/Live/Work Units	260 units	Elementary School (K-5)	0.2042	53
		Middle School (6-8)	0.0988	26
		High School (9-12)	0.0995	26
			Proposed Project Subtotal	*105*
Less Baseline Conditions				
Existing Retail	24,000 sf	Elementary School (K-5)	0.0000149	0
		Middle School (6-8)	0.0000069	0
		High School (9-12)	0.0000067	0
Previously-Approved Residential Building	134 units	Elementary School (K-5)	0.2042	27
		Middle School (6-8)	0.0988	13
		High School (9-12)	0.0995	13
			Baseline Conditions Subtotal	*53*
			Proposed Project Net Total	**52**
Mixed-Use (Retail/Residential) Alternative				
Residential/Live/Work Units	222 units	Elementary School (K-5)	0.2042	45
		Middle School (6-8)	0.0988	22
		High School (9-12)	0.0995	22
			Mixed-Use (Retail/Residential) Alternative Subtotal	*89*
			Baseline Conditions Subtotal	*53*
			Mixed-Use (Retail/Residential) Alternative Net Total	**36**

Note: The number of students has been rounded to the nearest whole number.
[a] *Los Angeles Unified School District, Student Generation Rate Calculation, August 2006.*
Source (table): Christopher A. Joseph & Associates, February 2009.

Recreation and Parks

Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed in a manner that is similar to the Proposed Project. However, this alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units that would be added under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. Fewer residential units would be developed under this alternative than under the Proposed Project. As such, fewer residents would be introduced into the project area, lessening the demand on parks and recreational facilities as compared to the Proposed Project. Based on the reduction in the number of dwelling units under this alternative, park fees would also be less than under the Proposed Project. Therefore, impacts on parks and recreation services under

the Mixed-Use (Retail/Residential) Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Libraries

Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed in a manner that is similar to the Proposed Project. However, this alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units that would be added under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As fewer residential units would be developed under this alternative, fewer residents would be introduced into the project area than under the Proposed Project. Therefore, impacts on libraries under the Mixed-Use (Retail/Residential) Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Traffic, Transportation, and Parking

The following analysis is based on the *Proposed Residential Development on Manchester Avenue, West of Lincoln Boulevard – Alternatives Traffic Analysis*, prepared by Crain & Associates, February 5, 2009, which is included as Appendix L to this Draft EIR.

Under the Mixed-Use (Retail/Residential) Alternative, the project site would be developed in a manner that is similar to the Proposed Project. However, this alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with 27,380 square feet of commercial/retail uses. As shown in Table VI-12, Mixed-Use (Retail/Residential) Alternative Trip Generation, the Proposed Project is estimated to result in a net reduction of 307 daily trips from baseline

Table VI-12
Mixed-Use (Retail/Residential) Alternative Trip Generation[a]

Land Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Existing Site Trips								
Specialty Retail	24,000 sf	1,064	17	12	29	53	67	120
Proposed Project Trips								
Apartments	260 du	1,713	26	105	131	118	64	182
Previously-Approved Apartments	(134) du	(956)	(14)	(55)	(69)	(61)	(33)	(94)
Total Area Intersection Trips		**(307)**	**(5)**	**38**	**33**	**4**	**(36)**	**(32)**
Mixed-Use (Retail/Residential) Alternative Trips								
Apartments	222 du	1,485	23	90	113	101	54	155
Previously-Approved Apartments	(134) du	(956)	(14)	(55)	(69)	(61)	(33)	(94)
Specialty Retail	27,380 sf	1,213	20	13	33	60	77	137
Existing Specialty Retail to be removed	(24,000) sf	(1,064)	(17)	(12)	(29)	(53)	(67)	(120)
Total Area Intersection Trips		**678**	**12**	**36**	**48**	**47**	**31**	**78**

[a] *For a conservative approach the Mixed-Use (Retail/Residential) Alternative takes the same approach as the Proposed Project.*

Table VI-12
Mixed-Use (Retail/Residential) Alternative Trip Generation[a]

Land Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total

Source: Crain & Associates, February 5, 2009.
Source (table): Christopher A. Joseph & Associates, February 5, 2009.

conditions, whereas this alternative would result in a net increase of 678 daily trips. Therefore, impacts related to operational project trips under the Mixed-Use (Retail/Residential) Alternative would be greater than those associated with the Proposed Project.

As shown in Table VI-13, Critical Movement Analysis (CMA) Summary Future (2012) Traffic Conditions – Without and With Mixed-Use (Retail/Residential) Alternative, the Mixed-Use (Retail/Residential) Alternative would result in a significant impact on one of the study intersections (Manchester Avenue and Lincoln Boulevard) during the PM Peak Hour. As such, mitigation would be required to reduce impacts to a less than significant level (see subheading Mitigation Measure, below). Therefore, traffic impacts under the Mixed-Use (Retail/Residential) Alternative would be greater than those associated with the Proposed Project.

Table VI-13
Critical Movement Analysis (CMA) Summary
Future (2012) Traffic Conditions – Without and With Mixed-Use (Retail/Residential) Alternative

No.	Intersection	Peak Hour	Future (2012) Without Project		Future (2012) With Proposed Project			Future (2012) With Mixed-Use (Retail/Residential) Alternative		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
1.	83rd Street and Lincoln Boulevard	AM	1.011	F	1.015	F	0.004	1.015	F	0.004
		PM	0.826	D	0.825	D	-0.001	0.830	D	0.004
2.	83rd Street and Rayford Drive	AM	0.486	A	0.490	A	0.004	0.490	A	0.004
		PM	0.433	A	0.429	A	-0.004	0.437	A	0.004
3.	Manchester Avenue and Pershing Drive	AM	0.365	A	0.366	A	0.001	0.366	A	0.001
		PM	0.455	A	0.455	A	0.000	0.457	A	0.002
4.	Manchester Avenue and Rayford Drive	AM	0.334	A	0.338	A	0.004	0.339	A	0.005
		PM	0.243	A	0.239	A	-0.004	0.247	A	0.004
5.	Manchester Avenue and Lincoln Boulevard	AM	0.700	B	0.707	C	0.007	0.707	C	0.007
		PM	0.813	D	0.808	D	-0.005	0.836	D	**0.023**[a]
6.	Manchester Avenue and Loyola Boulevard	AM	0.350	A	0.350	A	0.000	0.351	A	0.001
		PM	0.444	A	0.445	A	0.001	0.449	A	0.005
7.	Loyola Boulevard and Lincoln Boulevard	AM	0.293	A	0.294	A	0.001	0.294	A	0.001
		PM	0.490	A	0.488	A	-0.002	0.493	A	0.003

[a] *Significant impact (LADOT Revised Scale) before mitigation.*
Source: Crain & Associates, January 2009.
Source (table): Christopher A. Joseph & Associates, January 2009.

As shown in Table VI-14, Residential Street Impact Analysis Mixed-Use (Retail/Residential) Alternative, this alternative would not result in a significant impact on the study residential street segment. However, this alternative would generate more traffic on the study residential street segment than the Proposed Project. Therefore, impacts under the Mixed-Use (Retail/Residential) Alternative would be greater than those associated with the Proposed Project.

Table VI-14
Residential Street Impact Analysis
Mixed-Use (Retail/Residential) Alternative

Street Segment	Daily Volume				
	Existing (2008)	Without Project (2012)	Project Traffic	With Project (2012)	Percent Project Traffic
Proposed Project					
Rayford Drive south of 85th Street	2,350	2,652	-12	2,640	-0.5%
Mixed-Use (Retail/Residential) Alternative					
Rayford Drive south of 85th Street	2,350	2,630	51	2,681	1.90%

Source: Crain & Associates, January 2009.
Source (table): Christopher A. Joseph & Associates, February 5, 2009.

Mitigation Measure

As indicated in Table VI-13, Critical Movement Analysis (CMA) Summary Future (2012) Traffic Conditions – Without and With Mixed-Use (Retail/Residential) Alternative, above, it is anticipated that, prior to mitigation, this alternative would have a significant impact at the intersection of Manchester Avenue and Lincoln Boulevard. In order to address this significant impact, it is recommended that the following mitigation measure, with approval from both LADOT and Caltrans, be implemented.

- Manchester Avenue and Lincoln Boulevard – Restripe Manchester Avenue east and west of Lincoln Boulevard and modify the signal to provide dual left-turn lanes at the eastbound and westbound directions.

As shown in Table VI-15, Critical Movement Analysis (CMA) Summary Future (2012) Without and With Mitigation Measures Mixed-Use (Retail/Residential) Alternative, implementation of the above mitigation measure would reduce traffic impacts under the Mixed-Use (Retail/Residential) Alternative to a less than significant level.

Table VI-15
Critical Movement Analysis (CMA) Summary
Future (2012) Without and With Mitigation Measures
Mixed-Use (Retail/Residential) Alternative

No.	Intersection	Peak Hour	Future (2012) Without Project		Future (2012) With Project			Future (2012) With Project + Mitigation		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
5.	Manchester Avenue and Lincoln Boulevard	AM	0.700	B	0.707	C	0.007	0.612	B	-0.088
		PM	0.813	D	0.836	D	**0.023**[a]	0.768	C	-0.045

[a] *Significant impact (LADOT Revised Scale) before mitigation.*
Source: Crain & Associates, February 5, 2009.

Utilities and Services

Water

Development of the Mixed-Use (Retail/Residential) Alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As discussed in Section IV.L.1 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 21,804 gallons of water per day, whereas this alternative would consume approximately 16,978 gallons of water per day (see Table VI-16, Estimated Mixed-Use (Retail/Residential) Alternative Water Consumption, below). Therefore, impacts on water services under the Mixed-Use (Retail/Residential) Alternative would be less than those associated with the Proposed Project, although either scenario would result in less than significant impacts.

Table VI-16
Estimated Mixed-Use (Retail/Residential) Alternative Water Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	189 gallons/unit/day	49,140
Multi-Purpose/Gym	1,400 sf	320 gallons/ 1,000 sf/day	448
		Proposed Project Subtotal	*49,588*
Less Baseline Conditions			
Existing Retail	24,000 sf	102.4 gallons/1,000 sf/day	2,458
Previously-Approved Residential Building	134 units	189 gallons/unit/day	25,326
		Baseline Conditions Subtotal	*27,784*
		Proposed Project Net Total	**21,804**

Table VI-16
Estimated Mixed-Use (Retail/Residential) Alternative Water Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Mixed-Use (Retail/Residential) Alternative			
Residential/Live/Work Units	222 units	189 gallons/unit/day	41,958
Commercial/Retail	27,380 sf	102.4 gallons/1,000 sf/day	2,804
		Mixed-Use (Retail/Residential) Alternative Subtotal	*44,762*
		Baseline Conditions Subtotal	*27,784*
		Mixed-Use (Retail/Residential) Alternative Net Total	**16,978**

Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002. Water consumption calculated as 118% of wastewater generation for residential uses and 128% for non-residential uses.
Source (table): Christopher A. Joseph & Associates, February 2009.

Sewer

Development of the Mixed-Use (Retail/Residential) Alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As discussed in Section IV.L.2 Utilities of this Draft EIR, the Proposed Project is estimated to generate approximately 18,590 gallons of wastewater per day, whereas this alternative would generate approximately 14,350 gallons per day (see Table VI-17, Estimated Mixed-Use (Retail/Residential) Alternative Wastewater Generation, below). Therefore, impacts on wastewater services under the Mixed-Use (Retail/Residential) Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Table VI-17
Estimated Mixed-Use (Retail/Residential) Alternative Wastewater Generation

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	160 gallons/unit/day[a]	41,600
Multi-Purpose/Gym	1,400 sf	250 gallons/1,000 sf/day[b]	350
		Proposed Project Subtotal	*41,950*
Less Baseline Conditions			
Existing Retail	24,000 sf	80 gallons/1,000 sf/day	1,920
Previously-Approved Residential Building	134 units	160 gallons/unit/day[a]	21,440
		Baseline Conditions Subtotal	*23,360*
		Proposed Project Net Total	**18,590**

Table VI-17
Estimated Mixed-Use (Retail/Residential) Alternative Wastewater Generation

Land Use	Size	Consumption Rate	Total (gallons/day)
Mixed-Use (Retail/Residential) Alternative			
Residential Units	222 units	160 gallons/unit/day	35,520
Commercial/Retail	27,380 sf	80 gallons/1,000 sf/day	2,190
		Mixed-Use (Retail/Residential) Alternative Subtotal	*37,710*
		Baseline Conditions Subtotal	*23,360*
		Mixed-Use (Retail/Residential) Alternative Net Total	**14,350**

Note: sf = square feet, du = dwelling units
[a] *Assumes two bedrooms for all units.*
[b] *Calculated utilizing the "gymnasium" consumption rate.*
Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.
Source (table): Christopher A. Joseph & Associates, February 2009.

Solid Waste

Development of the Mixed-Use (Retail/Residential) Alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As discussed in Section IV.L.3 Utilities of this Draft EIR, the Proposed Project is estimated to generate approximately 384 pounds of solid waste per day, whereas this alternative would generate approximately 369 pounds of solid waste per day (see Table VI-18, Estimated Mixed-Use (Retail/Residential) Alternative Solid Waste Generation, below). Therefore, impacts on solid waste services under the Mixed-Use (Retail/Residential) Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Table VI-18
Estimated Mixed-Use (Retail/Residential) Alternative Solid Waste Generation

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	4 pounds/unit/day	1,040
		Proposed Project Subtotal	*1,040*
Less Baseline Conditions			
Existing Retail	24,000 sf	5 pounds/1,000 sf/day	120
Previously-Approved Residential Building	134 units	4 pounds/unit/day	536
		Baseline Conditions Subtotal	*656*
		Proposed Project Net Total	**384**

Table VI-18
Estimated Mixed-Use (Retail/Residential) Alternative Solid Waste Generation

Land Use	Size	Consumption Rate	Total (gallons/day)
Mixed-Use (Retail/Residential) Alternative			
Residential Units	222 units	4 pounds/unit/day	888
Commercial/Retail	27,380 sf	5 pounds/1,000 sf/day	137
Mixed-Use (Retail/Residential) Alternative Subtotal			*1,025*
Baseline Conditions Subtotal			*656*
Mixed-Use (Retail/Residential) Alternative Net Total			**369**

Note: sf = square feet, du = dwelling units
Source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation", 1981.
Source (table): Christopher A. Joseph & Associates, February 2009.

Electricity

Development of the Mixed-Use (Retail/Residential) Alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As discussed in Section IV.L.4 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 1,055 KW-Hours of electricity per day, whereas this alternative would consume approximately 1,482 KW-Hours of electricity per day (see Table VI-19, Estimated Mixed-Use (Retail/Residential) Alternative Electricity Consumption, below). Therefore, impacts on electricity services under the Mixed-Use (Retail/Residential) Alternative would be greater than those associated with the Proposed Project.

Table VI-19
Estimated Mixed-Use (Retail/Residential) Alternative Electricity Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	15.42 KW-Hours/unit/day	4,009
Proposed Project Subtotal			*4,009*
Less Baseline Conditions			
Existing Retail	24,000 sf	37 KW-Hours/1,000 sf/day	888
Previously-Approved Residential Building	134 units	15.42 KW-Hours/unit/day	2,066
Baseline Conditions Subtotal			*2,954*
Proposed Project Net Total			**1,055**

Table VI-19
Estimated Mixed-Use (Retail/Residential) Alternative Electricity Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Mixed-Use (Retail/Residential) Alternative			
Residential Units	222 units	15.42 KW-Hours/unit/day	3,423
Commercial/Retail	27,380	37 KW-Hours/1,000 sf/day	1,013
		Mixed-Use (Retail/Residential) Alternative Subtotal	*4,436*
		Baseline Conditions Subtotal	*2,954*
		Mixed-Use (Retail/Residential) Alternative Net Total	**1,482**

Note: sf = square feet, du = dwelling units
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.
Source (table): Christopher A. Joseph & Associates, February 2009.

Natural Gas

Development of the Mixed-Use (Retail/Residential) Alternative would result in a net increase of 88 dwelling units, which is less than the 126 dwelling units under the Proposed Project. Additionally, the space proposed for the 16 joint live/work units would instead be developed with approximately 27,380 square feet of commercial/retail uses. As discussed in Section IV.L.5 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 14,446 cubic feet of natural gas per day, whereas this alternative would consume approximately 12,103 cubic feet of natural gas per day (see Table VI-20, Estimated Mixed-Use (Retail/Residential) Alternative Natural Gas Consumption, below). Therefore, impacts on natural gas services under the Mixed-Use (Retail/Residential) Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Table VI-20
Estimated Mixed-Use (Retail/Residential) Alternative Natural Gas Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	133.7 cf/unit/day	34,762
		Proposed Project Subtotal	*34,762*
Less Baseline Conditions			
Existing Retail	24,000 sf	100 cf/1,000 sf/day	2,400
Previously-Approved Residential Building	134 units	133.7 cf/unit/day	17,916
		Baseline Conditions Subtotal	*20,316*
		Proposed Project Net Total	**14,446**

Table VI-20
Estimated Mixed-Use (Retail/Residential) Alternative Natural Gas Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Mixed-Use (Retail/Residential) Alternative			
Residential Units	222 units	133.7 cf/unit/day	29,681
Commercial/Retail	27,380 sf	100 cf/1,000 sf/day	2,738
Mixed-Use (Retail/Residential) Alternative Subtotal			*32,419*
Baseline Conditions Subtotal			*20,316*
Mixed-Use (Retail/Residential) Alternative Net Total			**12,103**

Note: sf = square feet, du = dwelling units
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.
Source (table): Christopher A. Joseph & Associates, February 2009.

Relationship to Project Objectives

The Mixed-Use (Retail/Residential) Alternative would satisfy most of the project objectives. It would not satisfy the following project objective:

- To maintain the opportunity for a commercial presence along Manchester Avenue by providing joint live/work units.

Reduction of Significant Project Impacts

Although the Mixed-Use (Retail/Residential) Alternative would avoid some of the environmental impacts associated with the Proposed Project, it would also increase a few. The Proposed Project would result in significant and unavoidable impacts with respect to Noise (Construction). This alternative would not avoid the significant impacts associated with Noise (Construction) and would result in increased environmental impacts with respect to Air Quality (Operation), Noise (Operation), Traffic (Operational Project Trips), and Electricity (Operation).

D. EXISTING ZONING ALTERNATIVE

Under the Existing Zoning Alternative, the project site would be developed in accordance with the existing City of Los Angeles Los Angeles Municipal Code zoning regulations. Under the Existing Zoning Alternative, the existing commercial uses would be demolished and an approximately 94,860 square-foot retail building with 380 parking spaces (in subterranean or partially subterranean levels) would be developed on the [Q]C4-1-CDO zoned (western) portion of the project site. The [Q]RAS4-1-CDO zoned (eastern) portion of the project site would be developed with the previously-approved 134 dwelling units. Under the Existing Zoning Alternative there would be full compliance with the current "Q" conditions (Ordinance No. 175,981), compliance with commercial corner regulations (LAMC Section 12.22-A.23), and compliance with transitional height limits (LAMC Section 12.21.1-A.10). The maximum building height for the retail building would be limited to 45 feet.

Aesthetics

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail building with a subterranean or partially subterranean parking structure containing 380 parking spaces. The eastern portion of the project site would be developed with the previously-approved 134 residential dwelling units. The maximum building height for the retail building on the western portion of the project site would be limited to 45 feet.

Although land uses under the Existing Zoning Alternative would differ from those under the Proposed Project, development on the project site would still occur. Just as with the Proposed Project, the Existing Zoning Alternative would not affect views from a designated scenic highway, corridor, or parkway; neither would it substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings. While there are two native Coast Live Oaks on the project site, (protected under Los Angeles Municipal Ordinance 177,404) neither tree is in an aesthetically pleasing condition (refer to Appendix J, *Playa Manchester Project Tree Report*, dated August 2009) and as they are in planters behind the existing retail development they cannot be seen from any of the surrounding areas. Therefore, these trees do not constitute a scenic resource. Therefore, impacts on scenic resources under the Existing Zoning Alternative would be similar to those associated with the Proposed Project.

Under the Existing Zoning Alternative, building height for the retail building on the western portion of the project site would be limited to 45 feet. This is less than the maximum height of the Proposed Project, which would be 58 feet. Even with this height limit, the building height under this alternative would be taller than the building that currently exists on the project site. As such, views of the project site would be available from more off-site locations that at present, same as the Proposed Project. Therefore, impacts under the Zoning Compliant Alterative with respect to views and visual character of the project site would be less than significant, similar to the Proposed Project.

Currently, the western portion of the project site is developed with 24,000 square feet of commercial uses and associated surface parking. This surface parking is a source of glare from sunlight reflecting off of car windshields. The Existing Zoning Alternative would eliminate the existing source of glare from windshields of parked cars by moving all parking to the enclosed parking garage. Similar to the Proposed Project, the Existing Zoning Alternative would utilize glass with low reflectivity or non-glare coating, thus reducing the net potential for glare generation. Under the Existing Zoning Alternative, lighting would be shielded and focused on the project site or located indoors, similar to the Proposed Project. Therefore, impacts related to light and glare under the Existing Zoning Alternative would be similar to the Proposed Project and less than significant.

Air Quality

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail building with a subterranean or partially subterranean parking structure containing 380 parking spaces. The eastern portion of the project site would be developed with the previously-approved 134 residential dwelling units, which is comprised of approximately 101,700

square feet. Development under the Existing Zoning Alternative of the eastern and western portions of the project site would be approximately 196,560 square feet.

Construction Impacts

As discussed, development under the Existing Zoning Alternative would total approximately 196,560 square feet; the Proposed Project would include approximately 266,456 square feet of development over the eastern and western portions of the site. Therefore, construction and grading activities performed during development of this alternative would be slightly less when compared to the Proposed Project. As such, the amount of development on the project site under this alternative would generally be slightly less to that of the Proposed Project. Therefore, short-term construction air quality impacts under the Existing Zoning Alternative would be slightly less to those associated with the Proposed Project and less than significant.

Operational Impacts

The Proposed Project would develop 260 residential units, including 16 joint live/work units, whereas the Existing Zoning Alternative would develop 134 residential units and approximately 94,860 square feet of retail uses. Although fewer residential units would be developed under this alternative, it would include a retail component. Retail uses generate more daily vehicle trips than residential uses. Therefore, operational air quality impacts related to vehicle emissions would be greater under the Existing Zoning Alternative than under the Proposed Project (see subheading Traffic, Transportation, and Parking, below).

The Existing Zoning Alternative would develop fewer residential units than the Proposed Project. As such, it would generate fewer greenhouse gas emissions from natural gas and electricity consumption than the Proposed Project. However, the increase in vehicle trips resulting from the development of retail uses under this alternative would cause an overall increase in greenhouse gas emissions at the project site when compared to the Proposed Project. Therefore, operational air quality impacts related to greenhouse gas emissions under the Existing Zoning Alternative would be greater than those associated with the Proposed Project.

Hazards and Hazardous Materials

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail building with a subterranean or partially subterranean parking structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. Excavation activities would occur under this alternative for building foundations and the subterranean parking. As such, any storage tanks uncovered during excavation would be removed from the project site. Therefore, impacts related to storage tanks under the Existing Zoning Alternative would be similar to those associated with the Proposed Project and less than significant. Existing structures would be demolished under this alternative. As such, it is possible that ACMs and LBP, should they be present, could be released into the environment. However, demolition activities under this alternative would be conducted in compliance with applicable regulations governing safe removal and disposal of ACMs and LBP, same as the Proposed Project. Therefore, impacts under the Existing Zoning Alternative with respect to ACMs and LBP would be similar to those associated with the Proposed Project and less

than significant. Additionally, it is possible that PCB-containing fixtures may be present on the project site; however, mitigation measures would be required to ensure safe removal of and PCBs encountered. Therefore, impacts with respect to PCBs under the Existing Zoning Alternative would be similar to those associated with the Proposed Project and less than significant.

As with the Proposed Project, under the Existing Zoning Alternative, the project site would be located within a City-designated Methane Buffer Zone. The project under this alternative would be required to comply with regulations set forth in LAMC Division 71, same as the Proposed Project. Therefore, impacts with respect to methane gas would be similar under the Existing Zoning Alternative to those associated with the Proposed Project and less than significant. Similar to the Proposed Project, the project site under this alternative would be located in proximity to City-designated disaster routes (Manchester Avenue and Lincoln Boulevard) as well as a City of Los Angeles Maintenance Warehouse. However, development of the project under this alternative would not impede access to or from Manchester Avenue or Lincoln Boulevard. Further, this alternative would not interfere with operation of the City Maintenance Warehouse. Therefore, impacts related to emergency response plans under the Existing Zoning Alternative would be similar to those associated with the Proposed Project and less than significant.

Hydrology and Water Quality

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail building with a subterranean or partially subterranean parking structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. The project site is not at risk for impacts associated with tsunamis, seiches, or flooding. Development under the Existing Zoning Alternative would include such construction activities as demolition and excavation, similar to the Proposed Project. Implementation of Best Management Practices pursuant to the Los Angeles Country SUSMP would be required for development of the project under this alternative. Therefore, short-term construction impacts on water quality under the Existing Zoning Alternative would be similar to those associated with the Proposed Project and less than significant. Additionally, mitigation measures would be implemented under this alternative to further reduce impacts on water quality. Therefore, operational water quality impacts under the Existing Zoning Alternative would be less than significant, similar to the Proposed Project.

Land Use and Planning

Under the Existing Zoning Alternative, the project site would be built out in accordance with the existing LAMC zoning guidelines. The current zoning on the project site is [Q]C4-1-CDO, on the western portion, and [Q]RAS4-1-CDO, on the eastern portion. Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail building with a subterranean or partially subterranean parking structure containing 380 parking spaces. The eastern portion of the project site would be developed with the previously-approved 134 residential units. Under the Existing Zoning Alternative, there would be full compliance with the "Q" conditions (Ordinance No. 175,981), compliance with commercial corner regulations (LAMC Section 12.22-A.23),

and compliance with transitional height limits (LAMC Section 12.21.1-A.10). The maximum building height for the retail building on the western portion of the project site would be limited to 45 feet.

Similar to the Proposed Project, the Existing Zoning Alternative would be located near major thoroughfares with access to local and regional transit lines. This alternative would also locate retail opportunities near residential uses, such as the adjacent Playa del Oro mixed-use development and the surrounding multi-family residential uses along Manchester Avenue, as well as the residential uses that would be constructed on the eastern portion of the project site. Locating retail and residential uses in proximity to each other and transit lines would serve to reduce the number of vehicle trips and vehicle miles traveled. Thus, the Existing Zoning Alternative would be consistent with and would implement regional and local plans and policies. Additionally, as with the Proposed Project, this alternative would be compatible with surrounding land uses. However, unlike the Proposed Project, this alternative would not require a discretionary zone change to change the zoning on the western portion of the project from [Q]C4-1-CDO to (T)(Q)RAS4-1-CDO. Under this alternative, the existing zoning on the western portion of the project site ([Q]C4-1-CDO) would remain. Therefore, impacts with respect to land use under the Existing Zoning Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Noise

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure with a subterranean or partially subterranean parking structure containing 380 parking spaces. The eastern portion of the project site would be developed with the previously-approved 134 residential units, which is comprised of approximately 101,700 square feet. Development under the Existing Zoning Alternative of the eastern and western portions of the project site would be approximately 196,560 square feet.

Construction Impacts

As discussed, development under the Existing Zoning Alternative would total approximately 196,560 square feet; the Proposed Project would include approximately 266,456 square feet of development over the eastern and western portions of the project site. Thus, the project under this alternative would be slightly smaller in size when compared to the Proposed Project. As such, construction activities associated with development of this alternative would decrease slightly in duration and intensity in comparison to the Proposed Project. Therefore, short-term construction-related noise impacts under the Existing Zoning Alternative would be slightly less to those associated with the Proposed Project. This alternative would not avoid the significant and unavoidable impacts resulting from construction noise.

Operational Impacts

As fewer residential units would be developed under this alternative, fewer vehicle trips would be generated by project residents. However, unlike the Proposed Project, this alternative includes a large retail component. Retail uses generate more daily vehicle trips than residential uses. As such, this alternative would result in an overall increase in daily vehicle trips when compared to the Proposed Project (see subheading Traffic, Transportation, and Parking, below). Therefore, operational noise

impacts under the Existing Zoning Alternative would be greater than those associated with the Proposed Project.

Population, Housing, and Employment

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As further discussed in Section IV.I. Population, Housing, and Employment of this Draft EIR, the Applicant has a vested right to construct the 134-unit residential building on the eastern portion of the project site. Thus, the Proposed Project would result in a net increase of 126 dwelling units and is estimated to generate approximately 374 new residents. Under the Existing Zoning Alternative, only the 134 previously-approved residential units would be developed, resulting in no net increase in new residents. As such, this alternative would generate 374 fewer residents than would the Proposed Project. Similar to the Proposed Project, this alternative would be within SCAG's population and housing projections for the Los Angeles subregion. Nonetheless, the Existing Zoning Alternative would not develop any new residential units. Therefore, population and housing impacts under the Existing Zoning Alternative would be less than significant and less than the impacts associated with the Proposed Project.

As shown in Table VI-21, Estimated Employment for the Existing Zoning Alternative, this alternative would provide employment for approximately 212 people. This represents a net increase of 158 employees over existing uses. As the Proposed Project does not include a retail component, the 158 employees estimated to be generated by the Existing Zoning Alternative is also the net increase in employees over the Proposed Project.

Table VI-21
Estimated Employment for the Existing Zoning Alternative

Use	Size (sf)	Employee Generation Factor[a]	Total Employees
Existing Uses			
Retail	24,000	0.0022371 employees/sf	54
		Existing Uses Total	***54***
Existing Zoning Alternative			
Retail	94,860	0.0022371 employees/sf	212
		Existing Zoning Alternative Total	***212***
		Net Increase in Employees	**158**

[a] *Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*
Source (table): Christopher A. Joseph & Associates, January 2009.

As further discussed in Section IV.I. Population, Housing, and Employment of this Draft EIR, SCAG has forecasted that the total employment level for Census Tract 2766.02 will increase by approximately 456 employees between 2000 and 2015. The net number of employees generated by development of this alternative represents approximately 35 percent of the projected employment for the project area. As

such, this alternative would also be within SCAG's employment projection. Whereas the Proposed Project would result in a net decrease in employees, this alternative represents a net increase in employees at the project site, which may be of economic benefit to the project area. Nonetheless, both the Proposed Project and the Existing Zoning Alternative would be within SCAG employment projections for the project area. Therefore, employment impacts under the Existing Zoning Alternative would be similar to those associated with the Proposed Project and less than significant.

Public Services

Fire Protection

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residents. As such, on-site population under this alternative would be less than under the Proposed Project. However, the type and frequency of fire protection services required is based on project land uses. The project under the Existing Zoning Alternative would only consist of retail uses, which are less dense and thus require fewer service calls than residential uses. Further, this alternative would not generate any new permanent residents. Therefore, impacts on fire protection services under the Existing Zoning Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Police Protection

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residents. Development of this alternative includes a retail component, which is estimated to generate approximately 158 net new employees. As retail uses are less dense than residential uses, the overall on-site population under this alternative would be lower than that of the Proposed Project. Further, this alternative would not generate any new permanent residents, thus the demand on police services would be lower under this alternative than the Proposed Project. Therefore, impacts on police protection services under the Existing Zoning Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Schools

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the

baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residents. As discussed in Section IV.J.3 Public Services of this Draft EIR, the Proposed Project is estimated to generate approximately 52 students, whereas this alternative would result in a net decrease of approximately 50 students from baseline conditions (see Table VI-22, Existing Zoning Alternative Estimated Student Generation, below). Further, payment of school facilities fees would be less under this alternative than the Proposed Project. Therefore, impacts on schools under the Existing Zoning Alternative would be less than those associated with the Proposed Project, although Proposed Project impacts would be less than significant.

Table VI-22
Existing Zoning Alternative Estimated Student Generation

Land Use	Size	School Type	Student Generation Factor[a]	Total Students Generated
Proposed Project				
Residential/Live/Work Units	260 units	Elementary School (K-5)	0.2042	53
		Middle School (6-8)	0.0988	26
		High School (9-12)	0.0995	26
			Proposed Project Subtotal	*105*
Less Baseline Conditions				
Existing Retail	24,000 sf	Elementary School (K-5)	0.0000149	0
		Middle School (6-8)	0.0000069	0
		High School (9-12)	0.0000067	0
Previously-Approved Residential Building	134 units	Elementary School (K-5)	0.2042	27
		Middle School (6-8)	0.0988	13
		High School (9-12)	0.0995	13
			Baseline Conditions Subtotal	*53*
			Proposed Project Net Total	**52**
Existing Zoning Alternative				
Retail	94,860	Elementary School (K-5)	0.0000149	1
		Middle School (6-8)	0.0000069	1
		High School (9-12)	0.0000067	1
			Existing Zoning Alternative Subtotal	*3*
			Baseline Conditions Subtotal	*53*
			Existing Zoning Alternative Net Total	***(50)***

Note: The number of students has been rounded to the nearest whole number.
[a] *Los Angeles Unified School District, Student Generation Rate Calculation, August 2006.*
Source (table): Christopher A. Joseph & Associates, February 2009.

Recreation and Parks

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be

developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residents. As such, park fees under this alternative would be less than under the Proposed Project. This alternative would result in a net increase in the number of employees on-site. However, employees would generally utilize park and recreational facilities near their residences during non-work hours. Nonetheless, it is possible that some employees may visit nearby park and recreational facilities before or after work, or during breaks, although the number of employees visiting nearby facilities would be reduced compared to residents of the Proposed Project. Therefore, impacts on parks and recreation services under the Existing Zoning Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Libraries

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residents. This alternative would result in a net increase in the number of employees on-site. However, employees would generally utilize library facilities near their residences during non-work hours. Nonetheless, it is possible that some employees may visit nearby libraries before or after work, or during breaks, although the number of employees visiting nearby facilities would be reduced compared to residents of the Proposed Project. Therefore, impacts on libraries under the Existing Zoning Alternative would be less than significant and less than impacts associated with the Proposed Project.

Traffic, Transportation, and Parking

The following analysis is based on the *Proposed Residential Development on Manchester Avenue, West of Lincoln Boulevard – Alternatives Traffic Analysis*, prepared by Crain & Associates, February 5, 2009, which is included as Appendix L to this Draft EIR.

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure with a subterranean or partially subterranean parking structure containing 380 parking spaces. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residential units.

As shown in Table VI-23, Existing Zoning Alternative Trip Generation, the Proposed Project is estimated to result in a net reduction of 307 daily trips from baseline conditions, whereas the Existing Zoning

Table VI-23
Existing Zoning Alternative Trip Generation[a]

Land Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Existing Site Trips								
Specialty Retail	24,000 sf	1,064	17	12	29	53	67	120
Proposed Project Trips								
Apartments	260 du	1,713	26	105	131	118	64	182
Previously-Approved Apartments	(134) du	(956)	(14)	(55)	(69)	(61)	(33)	(94)
Total Area Intersection Trips		**(307)**	**(5)**	**38**	**33**	**4**	**(36)**	**(32)**
Existing Zoning Alternative Trips								
Specialty Retail	94,860 sf	4,204	68	46	114	209	265	474
Existing Specialty Retail to be removed	(24,000) sf	(1,064)	(17)	(12)	(29)	(53)	(67)	(120)
Total Area Intersection Trips		**3,140**	**51**	**34**	**85**	**156**	**198**	**354**

[a] *For a conservative approach the Existing Zoning Alternative takes the same approach as the Proposed Project.*
Source: Crain & Associates, February 5, 2009.

Alternative would result in a net increase of 3,140 daily trips. Therefore, impacts under the Existing Zoning Alternative with respect to operational project trips would be greater than those associated with the Proposed Project.

As shown in Table VI-24, Critical Movement Analysis (CMA) Summary Future (2012) Traffic Conditions – Without and With Existing Zoning Alternative, this alternative would result in a significant impact on one of the study intersections (Manchester Avenue and Lincoln Boulevard) during the PM Peak Hour. As such, mitigation would be required to reduce impacts to a less than significant level (see subheading Mitigation Measure, below). Therefore, traffic impacts under the Existing Zoning Alternative would be greater than those associated with the Proposed Project.

Table VI-24
Critical Movement Analysis (CMA) Summary
Future (2012) Traffic Conditions – Without and With Existing Zoning Alternative

No.	Intersection	Peak Hour	Future (2012) Without Project		Future (2012) With Proposed Project			Future (2012) With Existing Zoning Alternative		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
1.	83rd Street and Lincoln Boulevard	AM	1.011	F	1.015	F	0.004	1.015	F	0.004
		PM	0.826	D	0.825	D	-0.001	0.843	D	0.017
2.	83rd Street and Rayford Drive	AM	0.486	A	0.490	A	0.004	0.490	A	0.004
		PM	0.433	A	0.429	A	-0.004	0.453	A	0.020
3.	Manchester Avenue and Pershing Drive	AM	0.365	A	0.366	A	0.001	0.367	A	0.002
		PM	0.455	A	0.455	A	0.000	0.464	A	0.009
4.	Manchester Avenue and Rayford Drive	AM	0.334	A	0.338	A	0.004	0.340	A	0.006
		PM	0.243	A	0.239	A	-0.004	0.266	A	0.023

Table VI-24
Critical Movement Analysis (CMA) Summary
Future (2012) Traffic Conditions – Without and With Existing Zoning Alternative

No.	Intersection	Peak Hour	Future (2012) Without Project		Future (2012) With Proposed Project			Future (2012) With Existing Zoning Alternative		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
5.	Manchester Avenue and Lincoln Boulevard	AM	0.700	B	0.707	C	0.007	0.707	C	0.007
		PM	0.813	D	0.808	D	-0.005	0.907	E	**0.094**[a]
6.	Manchester Avenue and Loyola Boulevard	AM	0.350	A	0.350	A	0.000	0.355	A	0.005
		PM	0.444	A	0.445	A	0.001	0.460	A	0.016
7.	Loyola Boulevard and Lincoln Boulevard	AM	0.293	A	0.294	A	0.001	0.295	A	0.002
		PM	0.490	A	0.488	A	-0.002	0.504	A	0.014

[b] *Significant impact (LADOT Revised Scale) before mitigation.*
Source: Crain & Associates, January 2009.
Source (table): Christopher A. Joseph & Associates, January 2009.

As shown in Table VI-25, Residential Street Impact Analysis Existing Zoning Alternative, this alternative would not result in a significant impact on the study residential street segment. However, this alternative would generate more traffic on the study residential street segment than the Proposed Project. Therefore, impacts under the Existing Zoning Alternative would be greater than those associated with the Proposed Project.

Table VI-25
Residential Street Impact Analysis
Existing Zoning Alternative

Street Segment	Daily Volume				
	Existing (2008)	Without Project (2012)	Project Traffic	With Project (2012)	Percent Project Traffic
Proposed Project					
Rayford Drive south of 85th Street	2,350	2,652	-12	2,640	-0.5%
Existing Zoning Alternative					
Rayford Drive south of 85th Street	2,350	2,630	236	2,866	8.23%

Source: Crain & Associates, January 2009.
Source (table): Christopher A. Joseph & Associates, February 5, 2009.

Mitigation Measure

As indicated in Table VI-24, Critical Movement Analysis (CMA) Summary Future (2012) Traffic Conditions – Without and With Existing Zoning Alternative, above, it is anticipated that, prior to mitigation, this alternative would have a significant impact at the intersection of Manchester Avenue and

Lincoln Boulevard. In order to address this significant impact, it is recommended that the following mitigation measure, with approval from LADOT and Caltrans, be implemented.

- Manchester Avenue and Lincoln Boulevard – Restripe Manchester Avenue east and west of Lincoln Boulevard and modify the signal to provide dual left-turn lanes at the eastbound and westbound directions.

As shown in Table VI-26, Critical Movement Analysis (CMA) Summary Future (2012) Without and With Mitigation Measures Existing Zoning Alternative, implementation of the above mitigation measure would reduce traffic impacts under the Existing Zoning Alternative to a less than significant level.

Table VI-26
Critical Movement Analysis (CMA) Summary
Future (2012) Without and With Mitigation Measures
Existing Zoning Alternative

No.	Intersection	Peak Hour	Future (2012) Without Project		Future (2012) With Project			Future (2012) With Project + Mitigation		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
5.	Manchester Avenue and Lincoln Boulevard	AM	0.700	B	0.707	C	0.007	0.612	B	-0.088
		PM	0.813	D	0.907	E	**0.094**[a]	0.825	D	0.012

[a] *Significant impact (LADOT Revised Scale) before mitigation.*
Source: Crain & Associates, January 2009.

Utilities and Services

Water

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residential units. As discussed in Section IV.L.1 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 21,804 gallons of water per day, whereas this alternative would result in a net decrease of approximately 18,070 gallons of water per day from baseline conditions (see Table VI-27, Existing Zoning Alternative Water Consumption, below). Therefore, impacts on water services under the Existing Zoning Alternative would be less than those associated with the Proposed Project, although either scenario would result in less than significant impacts.

Table VI-27
Estimated Existing Zoning Alternative Water Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	189 gallons/unit/day	49,140
Multi-Purpose/Gym	1,400 sf	320 gallons/ 1,000 sf/day	448
		Proposed Project Subtotal	*49,588*
Less Baseline Conditions			
Existing Retail	24,000 sf	102.4 gallons/1,000 sf/day	2,458
Previously-Approved Residential Building	134 units	189 gallons/unit/day	25,326
		Baseline Conditions Subtotal	*27,784*
		Proposed Project Net Total	**21,804**
Existing Zoning Alternative			
Retail	94,860 sf	102.4 gallons/1,000 sf/day	9,714
		Existing Zoning Alternative Subtotal	*9,714*
		Baseline Conditions Subtotal	*27,784*
		Existing Zoning Alternative Net Total	***(18,070)***

Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002. Water consumption calculated as 118% of wastewater generation for residential uses and 128% for non-residential uses.
Source (table): Christopher A. Joseph & Associates, February 2009.

Sewer

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residential units. As discussed in Section IV.L.2 Utilities of this Draft EIR, the Proposed Project is estimated to generate approximately 18,590 gallons of wastewater per day, whereas this alternative would result in a net decrease of approximately 15,771 gallons per day from baseline conditions (see Table VI-28, Existing Zoning Alternative Wastewater Generation, below).

Therefore, impacts on wastewater services under the Existing Zoning Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Table VI-28
Estimated Existing Zoning Alternative Wastewater Generation

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	160 gallons/unit/day[a]	41,600
Multi-Purpose/Gym	1,400 sf	250 gallons/1,000 sf/day[b]	350
		Proposed Project Subtotal	*41,950*
Less Baseline Conditions			
Existing Retail	24,000 sf	80 gallons/1,000 sf/day	1,920
Previously-Approved Residential Building	134 units	160 gallons/unit/day[a]	21,440
		Baseline Conditions Subtotal	*23,360*
		Proposed Project Net Total	**18,590**
Existing Zoning Alternative			
Retail	94,860 sf	80 gallons/1,000 sf/day	7,589
		Existing Zoning Alternative Subtotal	*7,589*
		Baseline Conditions Subtotal	*23,360*
		Existing Zoning Alternative Net Total	***(15,771)***

Note: sf = square feet, du = dwelling units
[a] *Assumes two bedrooms for all units.*
[b] *Calculated utilizing the "gymnasium" consumption rate.*
Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.
Source (table): Christopher A. Joseph & Associates, February 2009.

Solid Waste

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residential units. As discussed in Section IV.L.3 Utilities of this Draft EIR, the Proposed Project is estimated to generate approximately 384 pounds of solid waste per day, whereas this alternative would result in a net decrease of approximately 182 pounds of solid waste per day from baseline conditions (see Table VI-29, Estimated Existing Zoning Alternative Solid Waste Generation, below). Therefore, impacts on solid waste services under the Existing Zoning Alternative would be less than significant and less than the impacts associated with the Proposed Project.

Table VI-29
Estimated Zoning Compliant Solid Waste Generation

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	4 pounds/unit/day	1,040
		Proposed Project Subtotal	*1,040*
Less Baseline Conditions			
Existing Retail	24,000 sf	5 pounds/1,000 sf/day	120
Previously-Approved Residential Building	134 units	4 pounds/unit/day	536
		Baseline Conditions Subtotal	*656*
		Proposed Project Net Total	**384**
Existing Zoning Alternative			
Retail	94,860 sf	5 pounds/1,000 sf/day	474
		Existing Zoning Alternative Subtotal	*474*
		Baseline Conditions Subtotal	*656*
		Existing Zoning Alternative Net Total	***(182)***

Note: sf = square feet, du = dwelling units
Source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation", 1981.
Source (table): Christopher A. Joseph & Associates, February 2009.

Electricity

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residential units. As discussed in Section IV.L.4 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 1,055 KW-Hours of electricity per day, whereas this alternative would consume approximately 556 KW-Hours of electricity per day (see Table VI-30, Estimated Existing Zoning Alternative Electricity Consumption, below). Therefore, impacts on electricity services under the Existing Zoning Alternative would be less than significant and less than those associated with the Proposed Project.

Table VI-30
Estimated Existing Zoning Alternative Electricity Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	15.42 KW-Hours/unit/day	4,009
		Proposed Project Subtotal	*4,009*

Table VI-30
Estimated Existing Zoning Alternative Electricity Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Less Baseline Conditions			
Existing Retail	24,000 sf	37 KW-Hours/1,000 sf/day	888
Previously-Approved Residential Building	134 units	15.42 KW-Hours/unit/day	2,066
		Baseline Conditions Subtotal	*2,954*
		Proposed Project Net Total	**1,055**
Existing Zoning Alternative			
Retail	94,860	37 KW-Hours/1,000 sf/day	3,510
		Existing Zoning Alternative Subtotal	*3,510*
		Baseline Conditions Subtotal	*2,954*
		Existing Zoning Alternative Net Total	**556**

Note: sf = square feet, du = dwelling units
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.
Source (table): Christopher A. Joseph & Associates, February 2009.

Natural Gas

Under the Existing Zoning Alternative, the western portion of the project site would be developed with an approximately 94,860 square foot retail structure. The eastern portion of the project site would be developed with the previously-approved 134 residential units. As the 134-unit building has already undergone environmental review pursuant to CEQA, the 134 residential units would constitute the baseline conditions under this alternative. Therefore, development of the project under this alternative would result in no net increase or decrease in residential units. As discussed in Section IV.L.5 Utilities of this Draft EIR, the Proposed Project is estimated to consume approximately 14,446 cubic feet of natural gas per day, whereas this alternative would result in a net decrease of approximately 17,578 cubic feet of natural gas per day from baseline conditions (see Table VI-31, Estimated Existing Zoning Alternative Natural Gas Consumption, below). Therefore, impacts on natural gas services under the Existing Zoning Alternative would be less than significant and less than impacts associated with the Proposed Project.

Table VI-31
Estimated Existing Zoning Alternative Natural Gas Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Proposed Project			
Residential/Live/Work Units	260 units	133.7 cf/unit/day	34,762
		Proposed Project Subtotal	*34,762*

Table VI-31
Estimated Existing Zoning Alternative Natural Gas Consumption

Land Use	Size	Consumption Rate	Total (gallons/day)
Less Baseline Conditions			
Existing Retail	24,000 sf	100 cf/1,000 sf/day	2,400
Previously-Approved Residential Building	134 units	133.7 cf/unit/day	17,916
		Baseline Conditions Subtotal	*20,316*
		Proposed Project Net Total	**14,446**
Existing Zoning Alternative			
Retail	27,380 sf	100 cf/1,000 sf/day	2,738
		Existing Zoning Alternative Subtotal	*2,738*
		Baseline Conditions Subtotal	*20,316*
		Existing Zoning Alternative Net Total	***(17,578)***

Note: sf = square feet, du = dwelling units
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.
Source (table): Christopher A. Joseph & Associates, February 2009.

Relationship to Project Objectives

The Existing Zoning Alternative would satisfy most of the project objectives. However, the Existing Zoning Alternative would not achieve the following project objective to the same extent as the Proposed Project:

- To establish infill development providing housing on-site to serve the local community in a manner consistent with the RAS4 zone.

Reduction of Significant Project Impacts

Although the Existing Zoning Alternative would avoid some of the environmental impacts associated with the Proposed Project, it would increase a few. The Proposed Project would result in significant and unavoidable impacts with respect to Noise (Construction). This alternative would not avoid the significant impacts associated with Noise (Construction) and would result in increased environmental impacts with respect to Air Quality (Operation), Noise (Operation), Traffic (Operational Project Trips), and Electricity (Operation).

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project Alternative would be environmentally superior to the Proposed Project, as it would avoid the significant and unavoidable impacts associated with the Proposed Project – Noise (Construction). However, the No Project Alternative would not achieve any of the project objectives.

In accordance with CEQA Guidelines Section 15126.6(e), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the

other alternatives. As shown in the alternatives analysis provided above and Table VI-32, Alternatives Comparison, the Reduced Density Alternative would result in similar impacts to those associated with the Proposed Project, however, impacts under this alternative would occur to a lesser degree than under the Proposed Project. Therefore, the Reduced Density Alternative has been chosen as the environmentally superior alternative.

Table VI-32
Alternatives Comparison

Impact Area	Proposed Project Impact With Mitigation	Alternative A: No Project Alternative	Alternative B: Reduced Density Alternative	Alternative C: Mixed-Use (Retail/Residential) Alternative	Alternative D: Existing Zoning Alternative
Aesthetics					
Scenic Resources	Less Than Significant	Less	Similar	Similar	Similar
Visual Character	Less Than Significant	Greater	Less	Similar	Similar
Light and Glare	Less Than Significant	Similar	Similar	Similar	Similar
Air Quality					
Construction	Less Than Significant	Less	Less	Similar	Less
Operation	Less Than Significant	Less	Less	Greater	Greater
Hazards and Hazardous Materials	Less Than Significant	Greater	Similar	Similar	Similar
Hydrology and Water Quality					
Water Quality	Less Than Significant	Greater	Similar	Similar	Similar
Land Use and Planning	Less Than Significant	Greater	Similar	Similar	Less
Noise					
Construction Noise	Significant and Unavoidable	Less	Similar	Similar	Less
Operational Noise	Less Than Significant	Greater	Less	Greater	Greater
Population, Housing, and Employment					
Population	Less Than Significant	Less	Less	Less	Less
Housing	Less Than Significant	Less	Less	Less	Less
Employment	Less Than Significant	N/A	N/A	Similar	Similar
Public Services					
Fire	Less Than Significant	Less	Similar	Less	Less
Police	Less Than Significant	Less	Less	Less	Less
Schools	Less Than Significant	Less	Less	Less	Less
Parks	Less Than Significant	Less	Less	Less	Less
Libraries	Less Than Significant	Less	Less	Less	Less
Traffic/Transportation/Parking	Less Than Significant	Greater	Less	Greater	Greater

Table VI-32 (Continued)
Alternatives Comparison

Impact Area	Proposed Project Impact With Mitigation	Alternative A: No Project Alternative	Alternative B: Reduced Density Alternative	Alternative C: Mixed-Use (Retail/Residential) Alternative	Alternative D: Existing Zoning Alternative
Utilities and Services					
Water	Less Than Significant	Less	Less	Less	Less
Sewer	Less Than Significant	Less	Less	Less	Less
Solid Waste	Less Than Significant	Less	Less	Less	Less
Electricity	Less Than Significant	Less	Less	Greater	Less
Natural Gas	Less Than Significant	Less	Less	Less	Less

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VIII. ACRONYMS

AB	Assembly Bill
AC	alternating current
ACMs	asbestos-containing materials
ADT	average daily traffic
AEP	Association of Environmental Professionals
AF	acre-feet
AFY	acre-feet per year
ALUP	Airport Land Use Plan
ANSI	American National Standard Institute
AQMP	Air Quality Management Plan
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
BBB	Santa Monica Big Blue Bus Lines
Bcf	billion cubic feet
Bcf/day	billion cubic feet per day
bgs	below ground surface
BMPs	Best Management Practices
BR	Bedroom
CAA	Federal Clean Air Act
CAAQS	California ambient air quality standards
CA FID	California Facility Inventory Database
Cal/EPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAT	Climate Action Team
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDO	Community Design Overlay
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cf	cubic feet
CFL	compact fluorescent light
CEQA	California Environmental Quality Act
CFCs	chloroflourocarbons
CFR	Code of Federal Regulations
CH_4	methane
CIWMB	California Integrated Waste Management Board
CMA	Critical Movement Analysis

CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	equivalent mass of CO_2
COHb	carboxyhemoglobin
CPA	Community Plan Area
CSSA	Collection System Settlement Agreement
CTCSP	Coastal Transportation Corridor Specific Plan
CWA	Clean Water Act
CWC	California Water Code
dB	decibel
dBA	A-weighted decibel scale
DC	direct current
DHS	Department of Health Services
DTSC	Department of Toxic Substances Control
du	dwelling unit
EE	energy efficiency
EIR	Environmental Impact Report
EMI	Emissions Inventory Data
EMS	Emergency Medical Services
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal highway Administration
FINDS	Facility Index System
FPPP	Fire Protection and Prevention Plan
ft	feet
FTA	Federal Transit Administration
GCASP	General Construction Activity Stormwater Permit
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	global warming potential
HAZNET	Hazardous Waste Information System
HFCs	hydrofluorocarbons
HHDT	Heavy Heavy Duty Diesel Truck
HHW	Household Hazardous Waste
HOV	high-occupancy vehicle
HSA	Hyperion Service Area
HSWA	Hazardous and Solid Waste Act
HTP	Hyperion Treatment Plant
HVAC	heating, ventilation, and air conditioning
HWCL	Hazardous Waste Control Law

in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resources Plan
ITE	Institute of Transportation Engineers
ITS	Intelligent Transportation Systems
kV	kilovolt
KW-Hours	kilowatt-hours
LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LACC	Los Angeles County Code
LACMTA	Los Angeles County Metropolitan Transportation Authority
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LADRP	Los Angeles Department of Recreation and Parks
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
LBP	lead-based paint
L_{eq}	equivalent energy noise level
L_{max}	maximum instantaneous noise level
L_{min}	minimum instantaneous noise level
LMU	Loyola Marymount University
LNG	liquid natural gas
LOS	Level of Service
LSTs	localized significance thresholds
LUFT	leaking underground fuel tank
Metro	Metropolitan Transportation Authority
$\mu g/m^3$	micrograms per cubic meter
msl	mean sea level
MTA	Metropolitan Transportation Authority
MW	mega-watt
MWD	Metropolitan Water District
NAAQS	national ambient air quality standards
NAHB	National Association of Homebuilders
NERC	North American Electric Reliability Council
N_2O	nitrous oxide
NO_2	nitrogen dioxide
NOI	Notice of Intent

NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OSHA	Occupational Safety and Health Administration
Pb	lead
PCBs	polychlorinated biphenyls
pCi/L	picoCuries per liter
PFCs	perfluorocarbons
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PPV	peak particle velocity
PSI	pounds per square inch
PUC	Public Utilities Commission
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation and Recovery Act
RD	Reporting District
rm	room
RMS	root mean square
ROGs	reactive organic gases
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendment and Reauthorization Act
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SRCRD	Solid Resources Citywide Recycling Division
SRRE	Source Reduction and Recycling Element
st	student
STIP	State Transportation Improvement Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWEEPS	Statewide Environmental Evaluation and Planning System
SWPPP	Storm Water Pollution Prevention Program
SWRCB	State Water Resources Control Board

TACs	toxic air contaminants
TIA	Transportation Impact Assessment
TMDLs	Total Maximum Daily Loads
TRUs	transportation refrigeration units
TSCA	Toxic Substances Control Act
U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
USTs	underground storage tanks
UWMP	Urban Water Management Plan
V/C	volume-to-capacity
VdB	velocity in decibels
VMT	vehicle miles traveled
VOC	volatile organic compound
WECC	Western Electricity Coordinating Council
WFP	Water Facilities Plan
WSO	Water Services Organization
ZIMAS	Zoning Information and Map Access System