LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

Senior Residential Community at The Bellwood

Case Number: ENV-2018-7182-EIR

Project Location: 10328–10384 and 10341–10381 Bellwood Avenue, Los Angeles, CA 90064

Community Plan Area: West Los Angeles

Council District: 5—Koretz

Project Description: The Project proposes the development of a new eldercare facility for persons 62 years of age and older on a 2.22-acre (96,792 square feet) site located at 10328–10384 and 10341–10381 Bellwood Avenue (Project Site) in the West Los Angeles Community Plan area of the City of Los Angeles (City). The Project Site includes the portion of Bellwood Avenue that bifurcates the Project Site. The Project would include 192 senior housing residential units, comprised of 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms; 50,463 square feet of indoor common areas that include space for supporting services, common dining areas, a gym, indoor pool and spa, wellness center, activity rooms, family/living rooms, and building lobby and reception area; and 14,630 square feet of outdoor common areas, including several courtyards and terraces that would be distributed throughout the Project Site. The proposed uses would be located within a single building ranging in height from 38 feet to 70 feet, or three to six stories. A total of 140 vehicle parking spaces would be provided within two subterranean levels beneath the proposed building. Three existing multi-family residential developments with a total of 112 residential units would be removed to accommodate the Project. Additionally, the Project includes the vacation and realignment of the portion of Bellwood Avenue that currently bifurcates the Project Site. The Project would comprise 241,754 square feet of floor area with a floor area ratio (FAR) of 2.66:1.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
SBLP Century City, LLC

June 2019

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1. INTRODUCTION

An application for the proposed Senior Residential Community at the Bellwood Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues are prepared.

1.3.3 Final EIR

The lead agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the lead agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented.

If the Project is approved, then within five days of the action, the City files a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

INITIAL STUDY

2. EXECUTIVE SUMMARY

PROJECT TITLE	**SENIOR RESIDENTIAL COMMUNITY AT THE BELLWOOD**
ENVIRONMENTAL CASE NO.	ENV-2018-7182-EIR
RELATED CASES	ZA-2018-7183-ELD-SPR; VTT-82442

PROJECT LOCATION	**10328–10384 AND 10341–10381 BELLWOOD AVENUE, LOS ANGELES, CA 90064**
COMMUNITY PLAN AREA	WEST LOS ANGELES
GENERAL PLAN DESIGNATION	NEIGHBORHOOD COMMERCIAL
ZONING	R3-1-O (MULTIPLE RESIDENTIAL, HEIGHT DISTRICT 1, OIL DRILLING) AND C2-1VL-O (COMMERCIAL, HEIGHT DISTRICT 1VL, OIL DRILLING)
COUNCIL DISTRICT	5—KORETZ

LEAD CITY AGENCY	**CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING**
STAFF CONTACT	ADAM VILLANI
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APPLICANT	**SBLP CENTURY CITY, LLC**
ADDRESS	4514 COLE AVENUE, SUITE 1500, DALLAS, TX 75205
PHONE NUMBER	(214) 370-2650

PROJECT DESCRIPTION

The Project proposes the development of a new eldercare facility for persons 62 years of age and older on a 2.22-acre (96,792 square feet) site located at 10328-10384 and 10341-10381 Bellwood Avenue (Project Site) in the West Los Angeles Community Plan area of the City of Los Angeles (City). The Project Site includes the portion of Bellwood Avenue that bifurcates the Project Site. The Project would include 192 senior housing residential units, comprised of 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms, 50,463 square feet of indoor common

areas that include space for supporting services, common dining areas, a gym, indoor pool and spa, wellness center, activity rooms, family/living rooms, and building lobby and reception area, and 14,630 square feet of outdoor common areas, including several courtyards and terraces that would be distributed throughout the Project Site. The proposed uses would be located within a single building ranging in height from 38 feet to 70 feet, or three to six stories. A total of 140 vehicle parking spaces would be provided within two subterranean levels beneath the proposed building. Three existing multi-family residential developments with a total of 112 residential units would be removed to accommodate the Project. Additionally, the Project includes the vacation and realignment of the portion of Bellwood Avenue that currently bifurcates the Project Site. The Project would comprise 241,754 square feet of floor area with a floor area ratio (FAR) of 2.66:1.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

ENVIRONMENTAL SETTING

The Project Site is located within the West Los Angeles Community Plan area of the City of Los Angeles. The Project Site is irregularly shaped and bifurcated by Bellwood Avenue. Adjacent to the Project Site, Bellwood Avenue is a u-shaped street that connects to Olympic Boulevard at each end. The Project Site includes parcels located generally north and east/south of Bellwood Avenue as well as the portion of Bellwood Avenue that bifurcates the Project Site. The portion of the Project Site located generally north of Bellwood Avenue is bounded by the Century Park hotel to the north, Bellwood Avenue and multi-family residential uses to the east and south, and a small commercial shopping center to the west. The portion of the Project Site located east and south of Bellwood Avenue is generally bounded by a Courtyard by Marriott hotel and Bellwood Avenue to the north, single-family residential uses to the east and south, and a beauty salon to the west. Primary regional access is provided by the California State Route 2 (CA-2), the Santa Monica Freeway (I-10), and the San Diego Freeway (I-405), which are all accessible within 2 miles of the Project Site. Major arterials providing regional access to the Project Site include Olympic Boulevard, Beverly Glen Boulevard, and Pico Boulevard. The Project Site vicinity is developed primarily with a mix of commercial and residential uses.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g., permits, financing approval, or participation agreement)

None.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

No; consultation has not yet commenced.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☒ Aesthetics	☒ Greenhouse Gas Emissions	☒ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology/Water Quality	☒ Transportation
☐ Biological Resources	☒ Land Use/Planning	☒ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☒ Utilities/Service Systems
☒ Energy	☒ Noise	☐ Wildfire
☐ Geology/Soils	☒ Population/Housing	☒ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

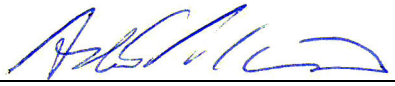
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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

Adam Villani	City Planner
PRINTED NAME	**TITLE**
	June 7, 2019
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

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

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

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3. PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Senior Residential Community at The Bellwood (Project) would provide for the development of a new eldercare facility for persons 62 years of age and older on a 2.22-acre (96,792 square feet) site located at 10328–10384 and 10341–10381 Bellwood Avenue (Project Site) in the West Los Angeles Community Plan area of the City of Los Angeles (City). The Project Site includes the portion of Bellwood Avenue that bifurcates the Project Site. The Project would include 192 senior housing residential units, comprised of 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms; 50,463 square feet of indoor common areas that include space for supporting services, common dining areas, a gym, indoor pool and spa, wellness center, activity rooms, family/living rooms, and building lobby and reception area; and 14,630 square feet of outdoor common areas, including several courtyards and terraces that would be distributed throughout the Project Site. The proposed uses would be located within a single building ranging in height from 38 feet to 70 feet, or three- to six stories. A total of 140 vehicle parking spaces would be provided within two subterranean levels beneath the proposed building. Three existing multi-family residential developments with a total of 112 residential units and 43,939 square feet would be removed to accommodate the Project. Additionally, the Project includes the vacation and realignment of the portion of Bellwood Avenue that currently bifurcates the Project Site. The Project would comprise 241,754 square feet of floor area with a floor area ratio (FAR) of 2.66:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 10328–10384 and 10341–10381 Bellwood Avenue within the West Los Angeles Community Plan area of the City. As shown in Figure 1 on page 10, the Project Site is irregularly shaped and is bifurcated by Bellwood Avenue. Adjacent to the Project Site, Bellwood Avenue is a u-shaped street that connects to Olympic Boulevard at each end. The Project Site includes parcels located generally north/west and east/south of Bellwood Avenue as well as the portion of Bellwood Avenue that bifurcates the Project Site. The portion of the Project Site located generally north/west of Bellwood Avenue is bounded by the Century Park hotel to the north, Bellwood Avenue and multi-family residential uses to the east and south, and a small commercial shopping center to the west that includes a cleaners and a smog check station. The portion of the Project Site located east and south of Bellwood Avenue is generally bounded by a Courtyard by Marriott hotel and Bellwood Avenue to the north, single-family residential uses to the east and south, and a beauty salon to the west. Along the southern and eastern boundaries of the Project Site there is a grade difference ranging between approximately 14 feet to 42 feet from the adjacent single-family residential uses such that the Project Site is situated below the adjacent single-family residential uses. This sloping topography continues across the Project Site and surroundings towards Olympic Boulevard.

Figure A-1
Project Location Map

Source: Google Maps, 2018.

3.2.2 Existing Conditions

As shown in Figure 2 on page 12, the Project Site is currently developed with several multi-family residential buildings and associated structures and parking and includes the portion of Bellwood Avenue that bifurcates the Project Site. Specifically, the Project Site encompasses three multi-family residential developments totaling 112 units and 43,939 square feet. These three multi-family residential developments include a two-story, 13-unit building located at 10341–10381 Bellwood Avenue; seven, two-story buildings with a total of 55 units located at 10328-10366 Bellwood Avenue; and six bungalow court buildings located at 10368-10384 Bellwood Avenue with a total of 44 units. Access to each of the multi-family residential developments is currently available via several driveways along Bellwood Avenue. Existing landscaping within the Project Site includes several shrubs and trees.

The Project Site is located within the West Los Angeles Community Plan area. The Project Site, which is comprised of 13 lots (including nine contiguous lots along the southerly side of Bellwood Avenue and four contiguous lots along the northerly side), has a Neighborhood Commercial General Plan land use designation and is zoned R3-1-O (Multiple Residential, Height District 1, Oil Drilling)[2] and C2-1VL-O (Commercial, Height 1VL, Oil Drilling).[3] The R3 designation permits a wide variety of residential uses, including group dwellings, multiple dwellings, apartment houses, boarding houses, rooming houses, accessory uses and home occupations, senior independent housing, and assisted living care housing. The C2 designation permits a wide variety of uses, including, but not limited to, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, sanitariums, clinics, and schools. Height District 1 within the R3 Zone limits the height to 45 feet and the FAR to 3:1. Height District 1VL within the C2 Zone limits the height to 45 feet and two stories (except that there is no restriction on the number of stories for buildings used entirely for residential purposes) and the FAR to 1.5:1. The "O" designation indicates the Project Site is located within an Oil Drilling District where the drilling of oil wells or the production from the wells of oil, gases, or other hydrocarbon substances is permitted. The Project Site is also located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan Area.

3.2.3 Surrounding Land Uses

As previously described, the Project Site includes parcels located generally north/west and east/south of Bellwood Avenue. The portion of the Project Site located generally north/west of Bellwood Avenue is bounded by the Century Park hotel to the north, Bellwood Avenue and multi-family residential uses to the east and south, and a small commercial shopping center to the west that includes a cleaners and a smog check station. The portion of the Project Site located east and south of Bellwood Avenue is generally bounded by a Courtyard by Marriott hotel and Bellwood Avenue to the north, single-family residential uses to the east and south, and a beauty salon to the west. Beyond the immediate surroundings of the Project Site are additional commercial and office uses along Olympic Boulevard, including a Ralph's grocery store located to the north and a Goodwill Donation Center to the west. Single- and multi-family residential uses continue east and south of the Project Site. Additionally, the Project Site is located 0.5 mile south of the Century City commercial district.

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[2] The R3 zoning applies to Lots 29-35 of Block 13 of Tract 7260.

[3] The C2 zoning applies to Lots 36-37 of Block 13 of Tract 7260 and Lots 10-13 of Block 14 of Tract 7260.

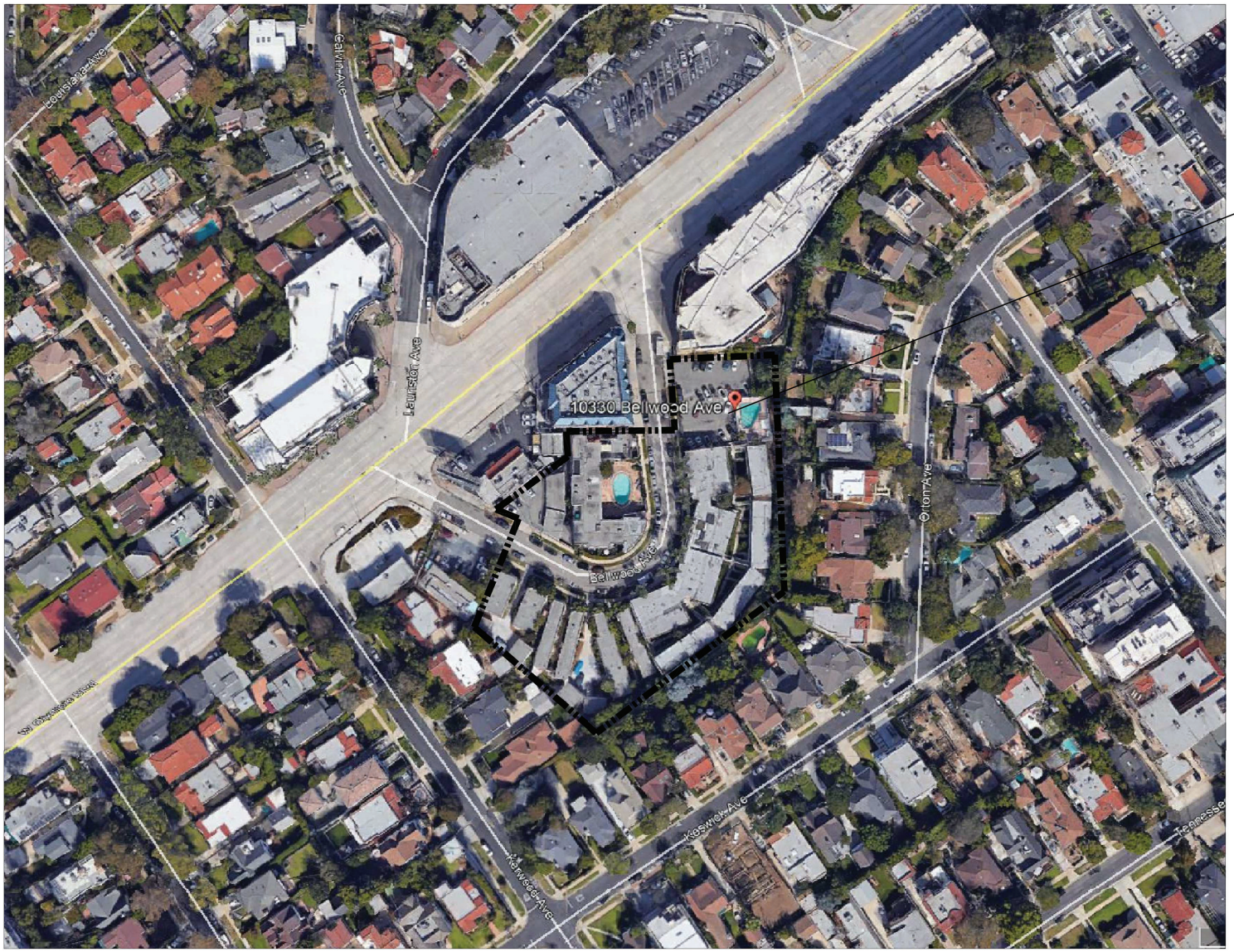

Figure A-2
Aerial Photograph of the Project Vicinity

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

Primary regional access is provided by California State Route 2 (CA-2), the Santa Monica Freeway (I-10), and the San Diego Freeway (I-405), which are all accessible within 2 miles of the Project Site. Major arterials providing regional access to the Project Site include Olympic Boulevard, Beverly Glen Boulevard, and Pico Boulevard. Public transit service in the vicinity of the Project Site includes Santa Monica Big Blue Bus Lines 3 and 5 with bus stops located along Olympic Boulevard, near Kerwood Avenue and at Century Park West.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project proposes the development of an eldercare facility consisting of 192 senior housing residential units comprised of 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms; 50,463 square feet of indoor common areas that include space for supporting services, common dining areas, a gym, indoor pool and spa, wellness center, activity rooms, family/living rooms, and building lobby and reception area; and 14,630 square feet of outdoor common areas, including several courtyards and terraces that would be distributed throughout the Project Site. The proposed uses would be located within a single building ranging in height from 38 feet to 70 feet, or three- to six stories. A total of 140 vehicle parking spaces would be provided within two subterranean levels beneath the proposed building. Three existing multi-family residential developments with a total of 112 residential units and 43,939 square feet would be removed to accommodate the Project. Additionally, as part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be vacated and realigned as a private street, with through access maintained from both sides of Bellwood Avenue. The Project would comprise 241,754 square feet of floor area with a floor area ratio (FAR) of 2.66:1. A Conceptual Site Plan and Conceptual Floor Plans are provided in Figure 3 through Figure 11 on pages 14 through 22.

The Project would provide services and assistance for the daily living needs of its residents. Assistance and activities provided on-site would include laundry, housekeeping, exercise and fitness classes, art and recreational classes, social events, and service of three meals per day in common dining rooms. A shuttle service would be provided by staff for local trips to shopping and services.

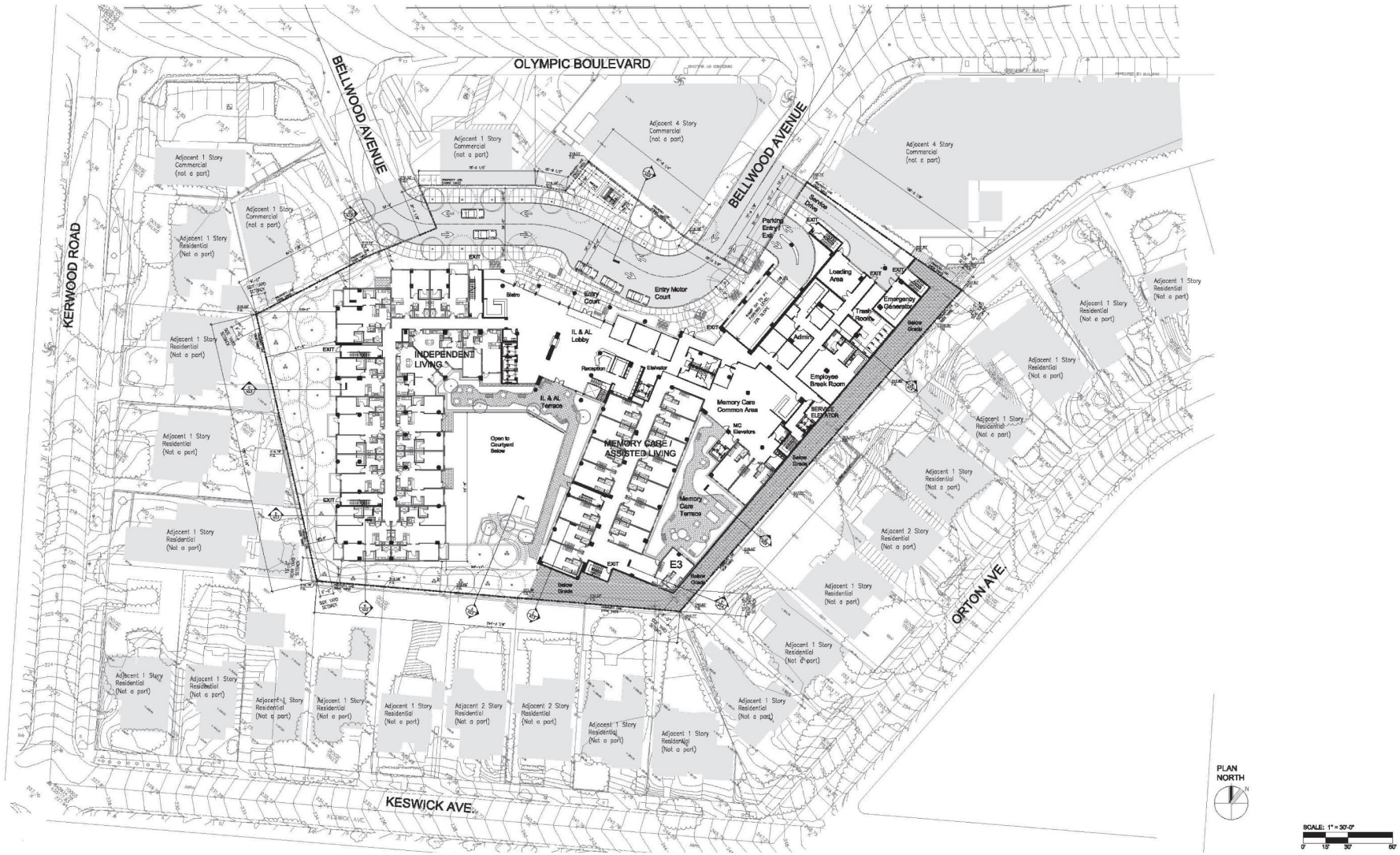

Figure A-3
Conceptual Site Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

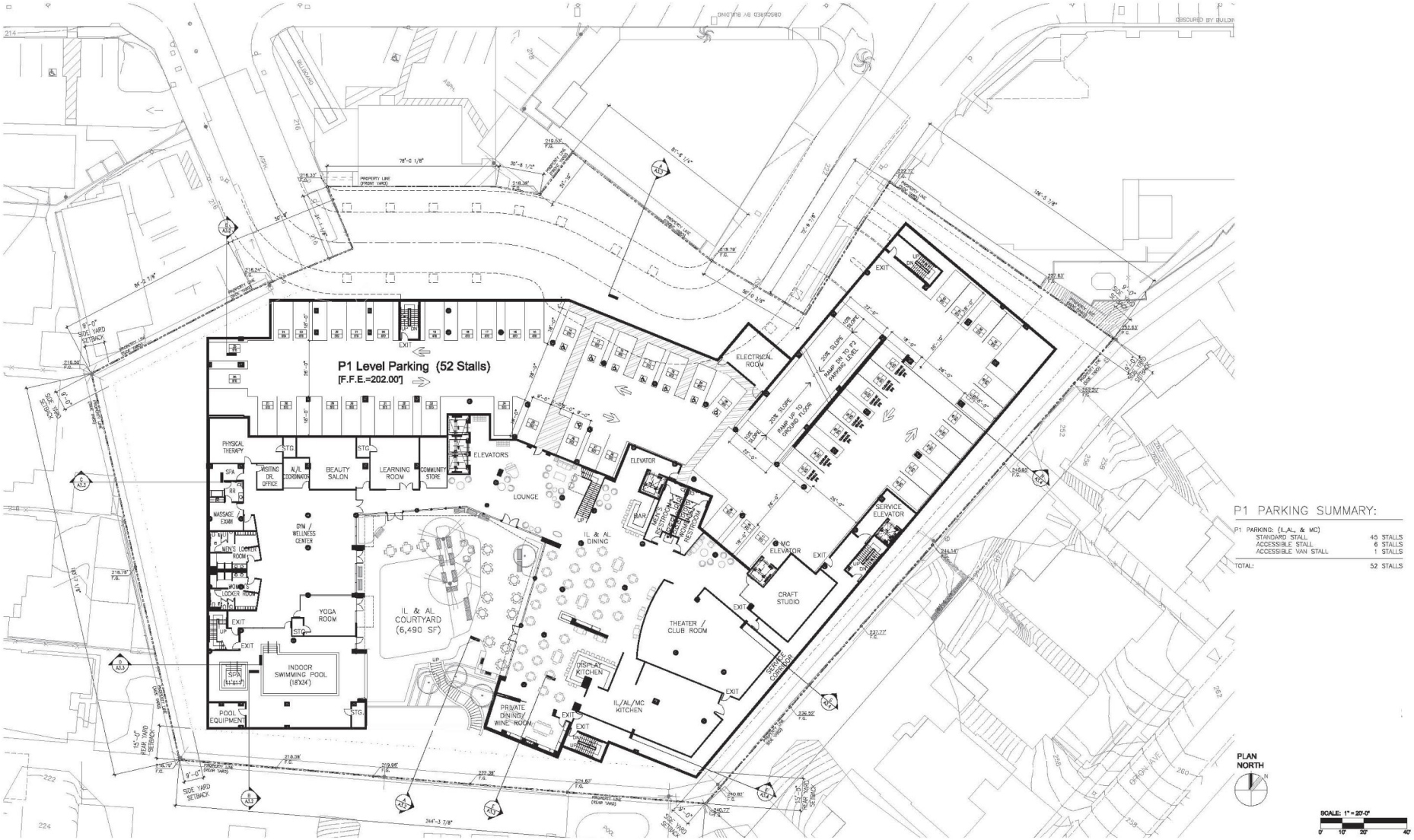

Figure A-4
P1 Floor Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

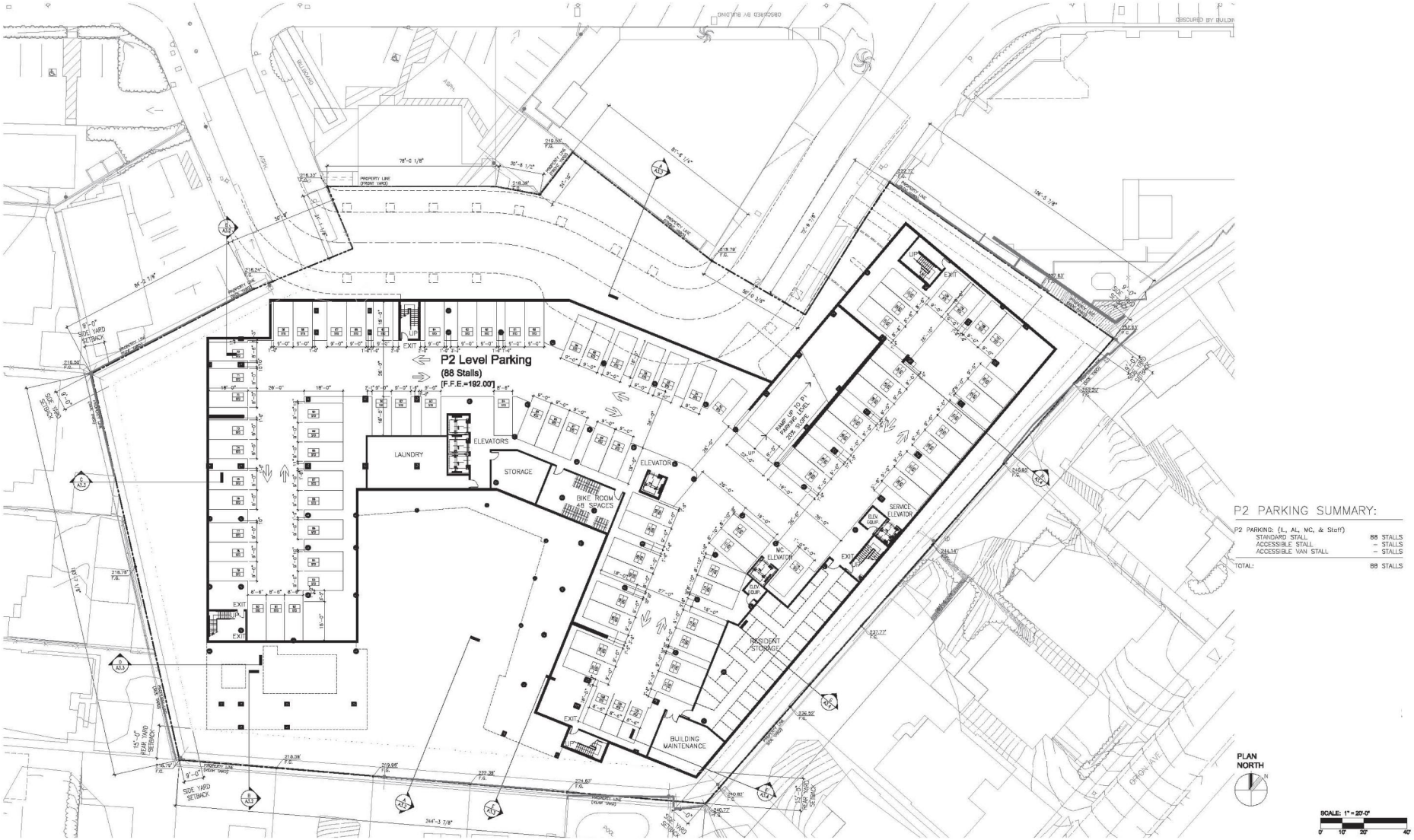

Figure A-5
P2 Floor Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

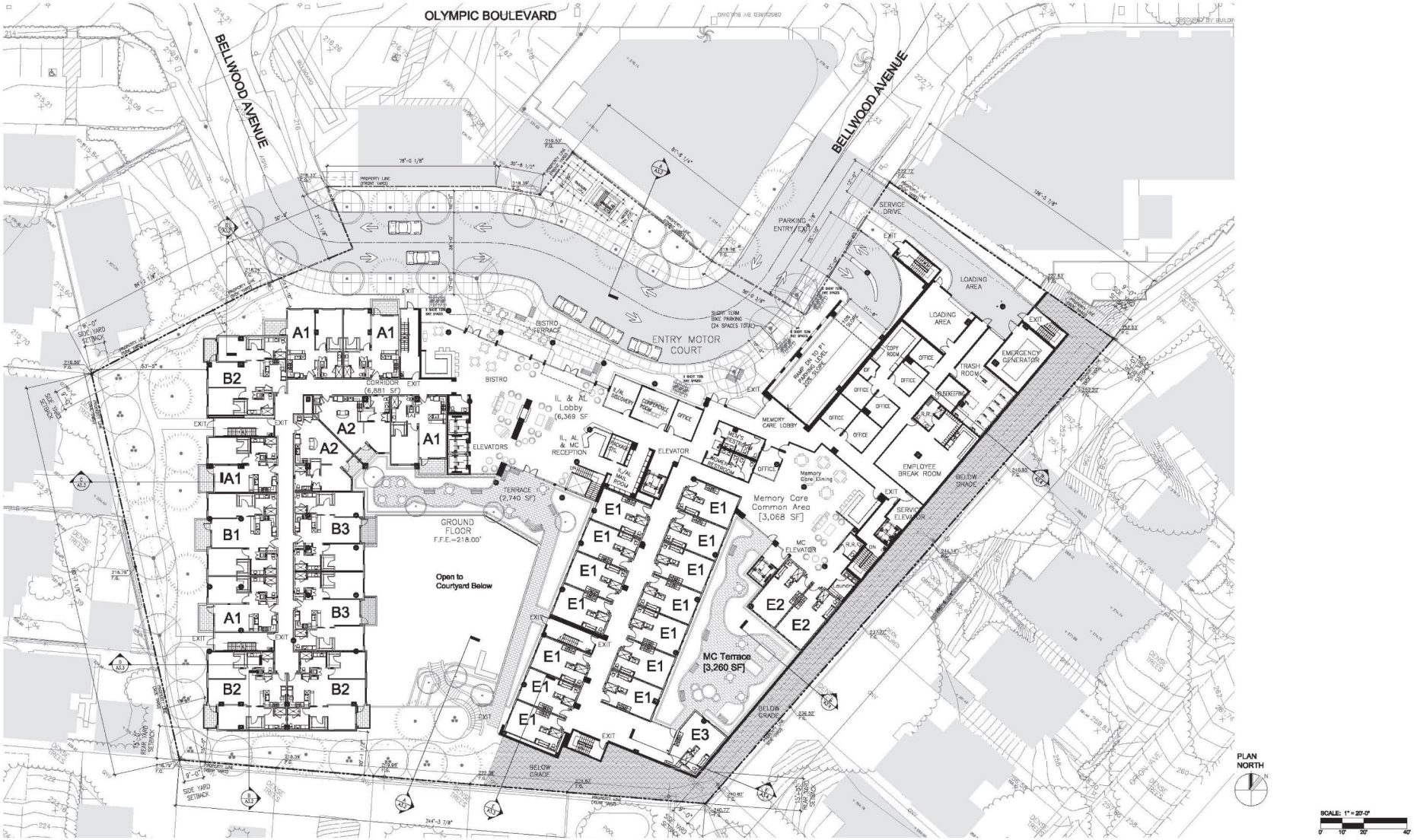

Figure A-6
Ground Floor Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

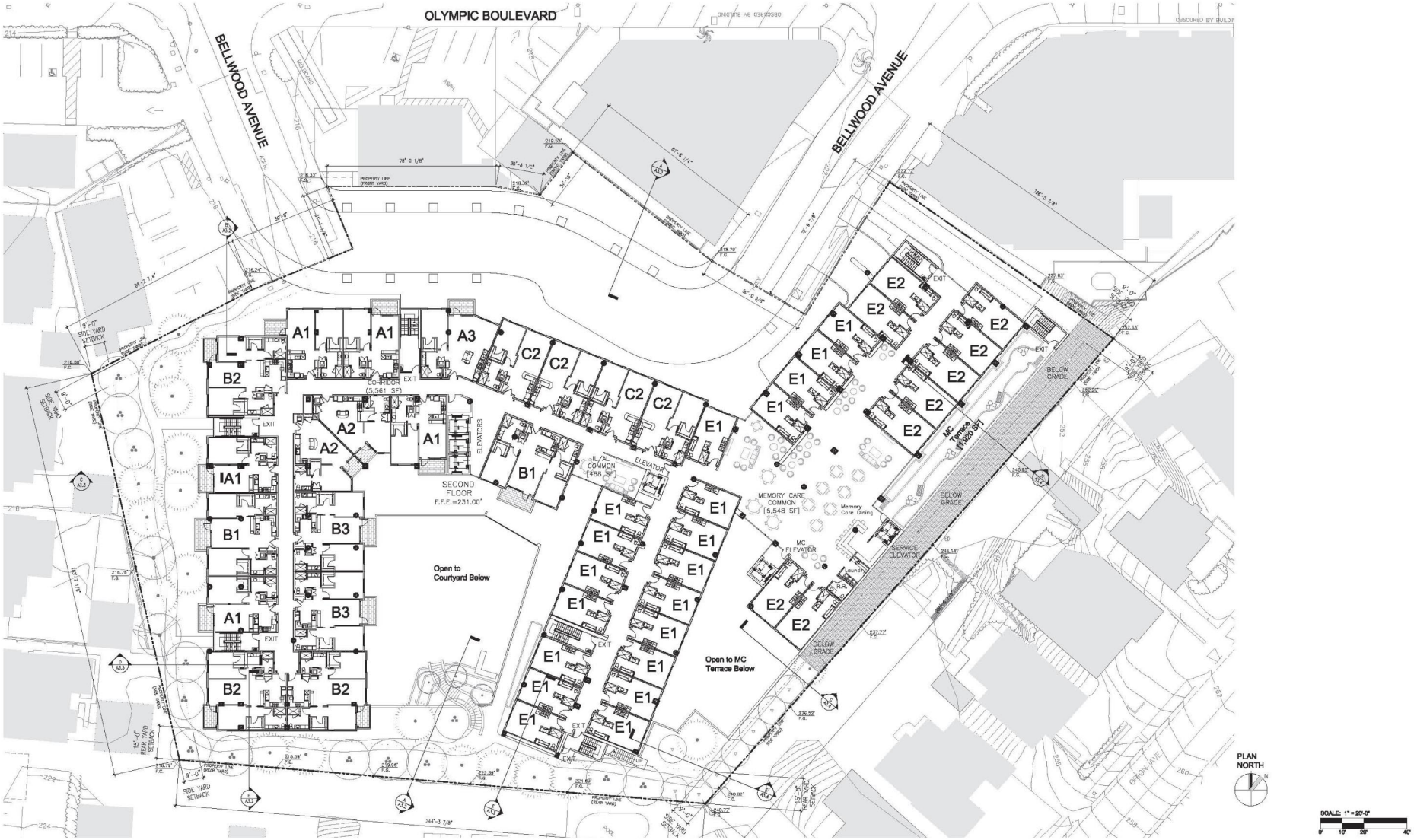

Figure A-7
Second Floor Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

Figure A-8
Third Floor Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

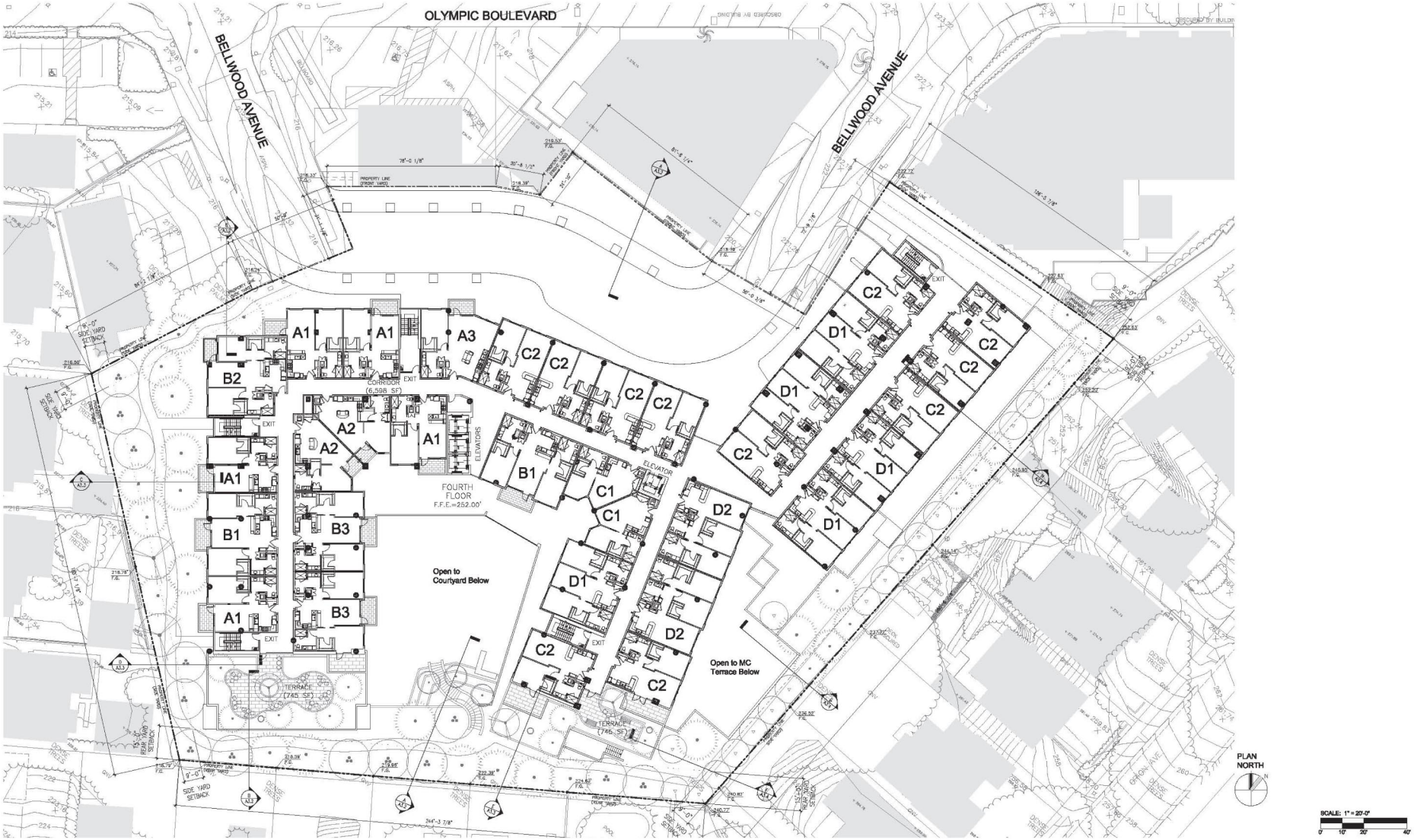

Figure A-9
Fourth Floor Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

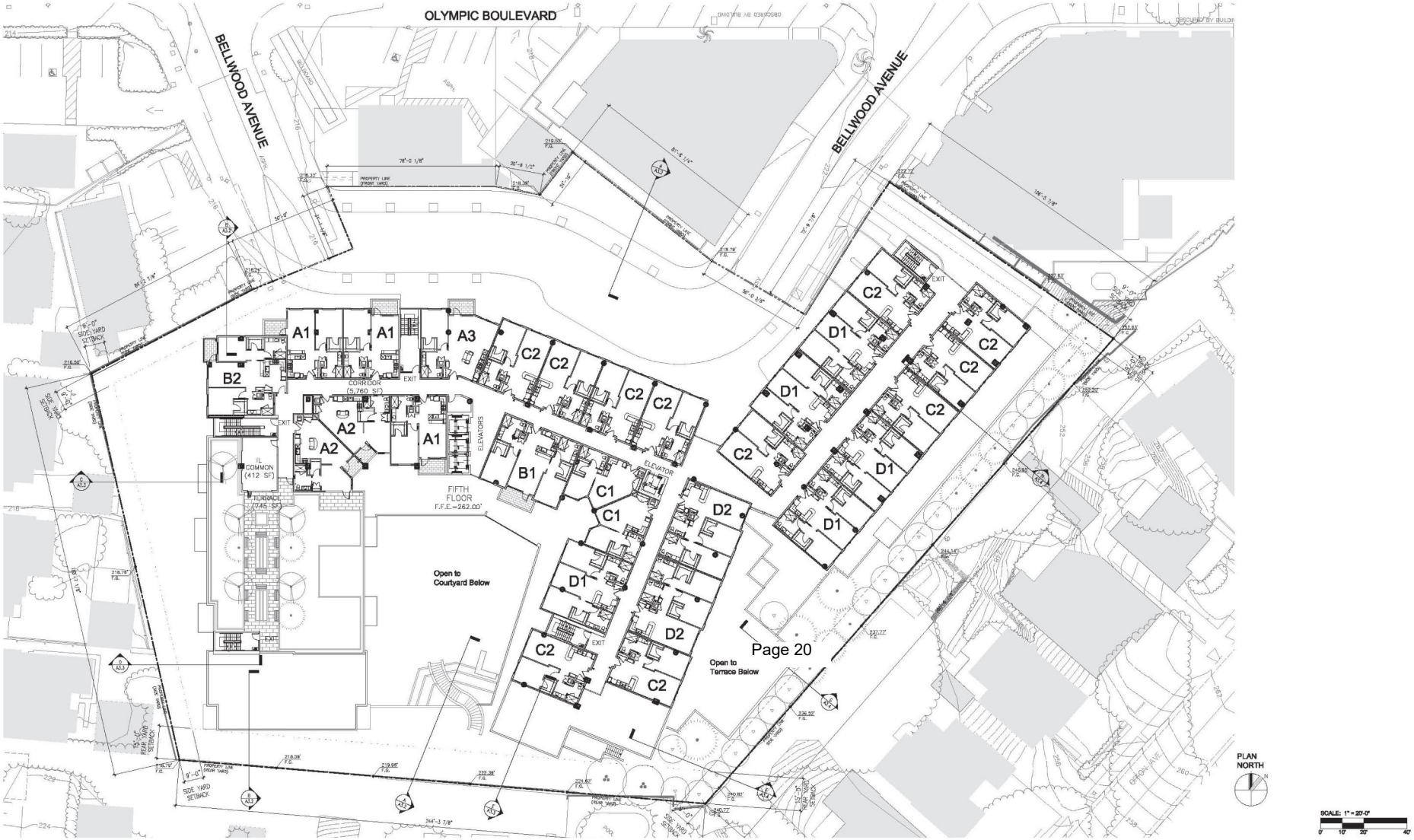

Figure A-10
Fifth Floor Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

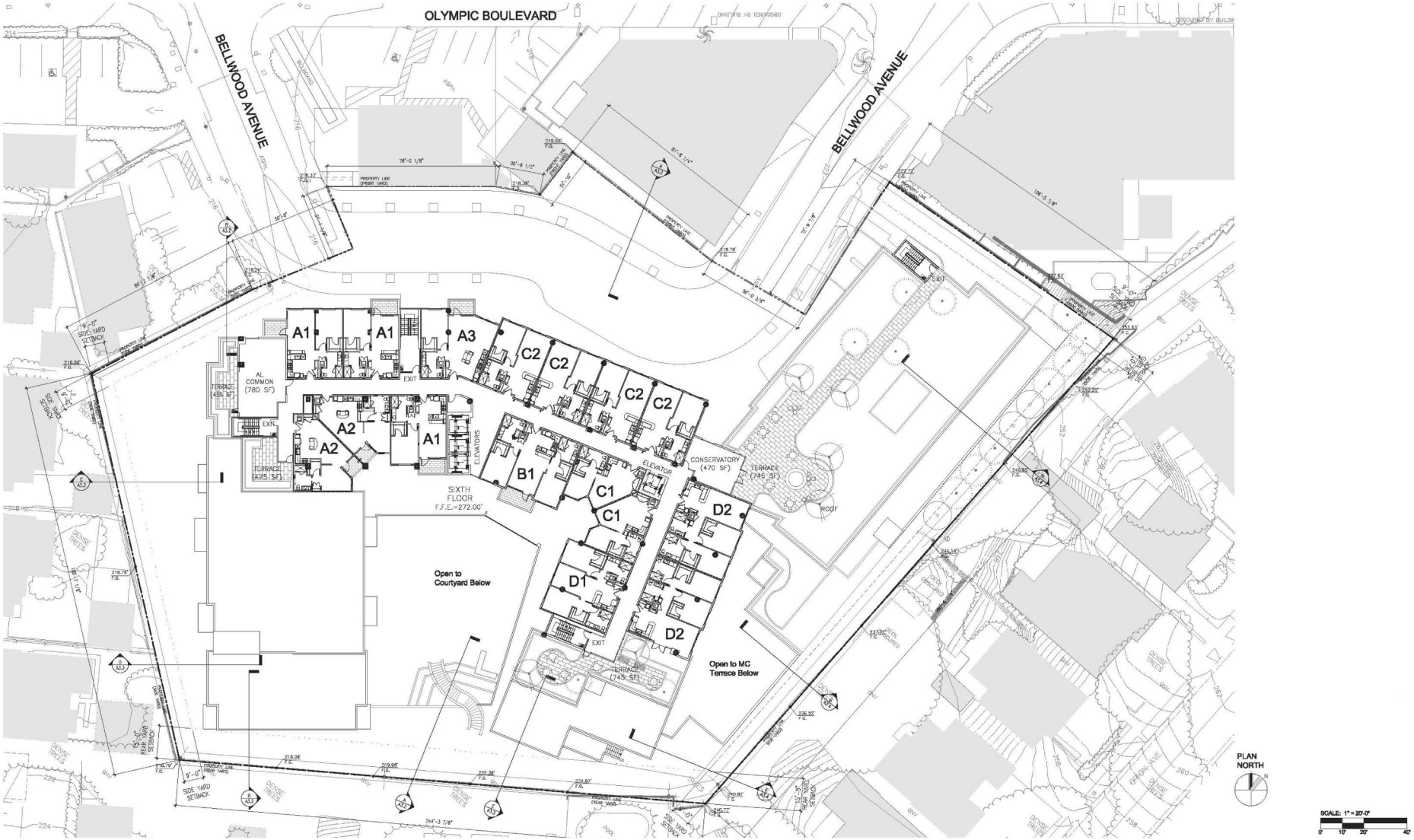

Figure A-11
Sixth Floor Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

3.3.2 Design and Architecture

As shown in the Conceptual Site Plan provided in Figure 3 on page 14, the proposed building would be constructed around a central courtyard that would be open to the sky through the extent of the building. The assisted living guest rooms and memory care units would be generally concentrated within the eastern portion of the building, east of the courtyard; and the independent living units would be generally concentrated within the western portion of the building, to the west of the courtyard. As summarized in Table 1 on page 24, the proposed 71 dwelling units dedicated to independent living would consist of 43 one- and 28 two-bedroom units that range in size from approximately 776 square feet to 1,216 square feet. Each of the independent living units would include a private outdoor terrace, a full kitchen, and in-unit washer/dryer. The independent living dwelling units would be located on the first through sixth floors generally within the west and central portions of the building. The proposed 75 guest rooms dedicated to assisted living would consist of 51 one- and 24 two-bedroom units that range in size from approximately 684 square feet to 1,212 square feet. Each of the assisted living guest rooms would include a sitting or living room area and a built-in cabinet with sink. The assisted living guest rooms would be located on the second through sixth floors generally within the central and east portions of the building. The 46 memory care guest rooms would be studio units ranging in size from approximately 404 to 460 square feet. Each of the memory care guest rooms would include private bedrooms with a private bathroom and a built-in cabinet with sink and under counter refrigerator. Some guest rooms may include a small seating area. The memory care guest rooms would be located on the first and second floors within the eastern portion of the building and would be separated from the independent living and assisted living components.

As illustrated in Figure 4 on page 15, many of the indoor common areas, including dining rooms, the gym, indoor pool and spa, wellness center, and several activity rooms would be located on the first subterranean level (P1). Level P1 would be open to the central courtyard such that the common indoor areas located within this level would have direct access to the central outdoor courtyard. These common areas would be separate from the parking area, and visitors who would park at the P1 level would not have direct access to the central courtyard or common areas. Stairs and elevators would be available from Level P1 to access the ground level above.

As shown in Figure 6 on page 17, the ground floor level (first floor) of the proposed building would serve as the primary entrance to the building. Specifically, the ground floor level would include: two separate lobbies to support independent living/assisted living and memory care services, respectively; a conference room, staff offices, and other service and support areas; and a lobby bistro area and a bistro terrace with outdoor seating, located adjacent to the independent living/assisted living lobby. The ground floor level within the eastern portion of the building would also include: a memory care common area, dining area, and a memory care outdoor terrace with a portion of the memory care guest rooms oriented around these uses. As depicted in Figure 6, independent living dwelling units would also be provided at the ground floor level of the western portion of the building along with an outdoor landscaped terrace for use by the independent living/assisted living residents. As illustrated in Figure 7 through Figure 11 on pages 18 through 22, the remainder of the independent living units, assisted living guest rooms, and memory care guest rooms would be provided on the second through sixth floors with additional common areas and terraces. Specifically, as shown in Figure 7, an additional memory care common area and dining area along with the remaining memory care guest rooms would be provided on the second floor. In addition, the second floor would include independent living units and assisted living guest rooms. The third through sixth floors would include the remaining independent living units and assisted living guest rooms along with additional terraces.

Table 1
Summary of Proposed Senior Housing Residential Units

Unit Type	Independent Living	Assisted Living	Memory Care
Studio	0	0	46
One-Bedroom	43	51	0
Two-Bedroom	28	24	0
Total	**71**	**75**	**46**

sf = square feet

Source: Eyestone Environmental, 2019.

Overall, the Project would feature a contemporary architectural style and would be designed to create a visually unified site with a new building designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. The proposed building would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. In particular, building scale and massing is defined by varying massing and height components that break up the façade into distinct and offset planes. Building materials would include smooth troweled stucco, composite metal wall panels with wood finish, limestone panels and glass.

3.3.3 Open Space and Landscaping

As shown in Figure 12 on page 25, the various components and levels of the proposed building would be integrated by a series of landscaped courtyards and terraces provided at every floor of the building. Specifically, as illustrated in Figure 13 on page 26, Level P1 would include a central courtyard that would be open to the sky and include an outdoor kitchenette and barbecue stations, exercise lawn, garden seating area, flexible lounge seating, and outdoor dining seating. As provided in Figure 14 on page 27, additional terraces would be provided at the ground floor, including a large ground level terrace, the memory care terrace, and the bistro terrace. The ground level terrace would include bench and table seating, raised planters, and bistro tables. The memory care terrace would feature a lawn, raised vegetable planters, bench and table seating, and raised planters. The bistro terrace would include bistro tables. As shown in Figure 14, additional benches and table seating would be provided at the entry plaza along Bellwood Avenue. Extensive landscaping that would serve as screening along the perimeter of the Project Site would also be provided at the ground level. As depicted in Figure 15 on page 28, additional terraces would be provided on levels two through six. On the second floor, an additional terrace would be provided that would include raised vegetable planters, benches and table seating, raised planters, and bistro tables. A smaller terrace would be provided on the third floor that would offer benches and table seating and bistro tables. Two larger terraces would be included on the fourth floor that would provide raised water features, benches and table seating, raised planters, and bistro tables. As illustrated in Figure 15, additional landscaped terraces would be provided on the fifth and sixth levels that include raised water features, benches and table seating, raised planters, and bistro tables. Overall, the Project would provide 14,630 square feet of open space and would exceed the LAMC required open space of 7,800 square feet.

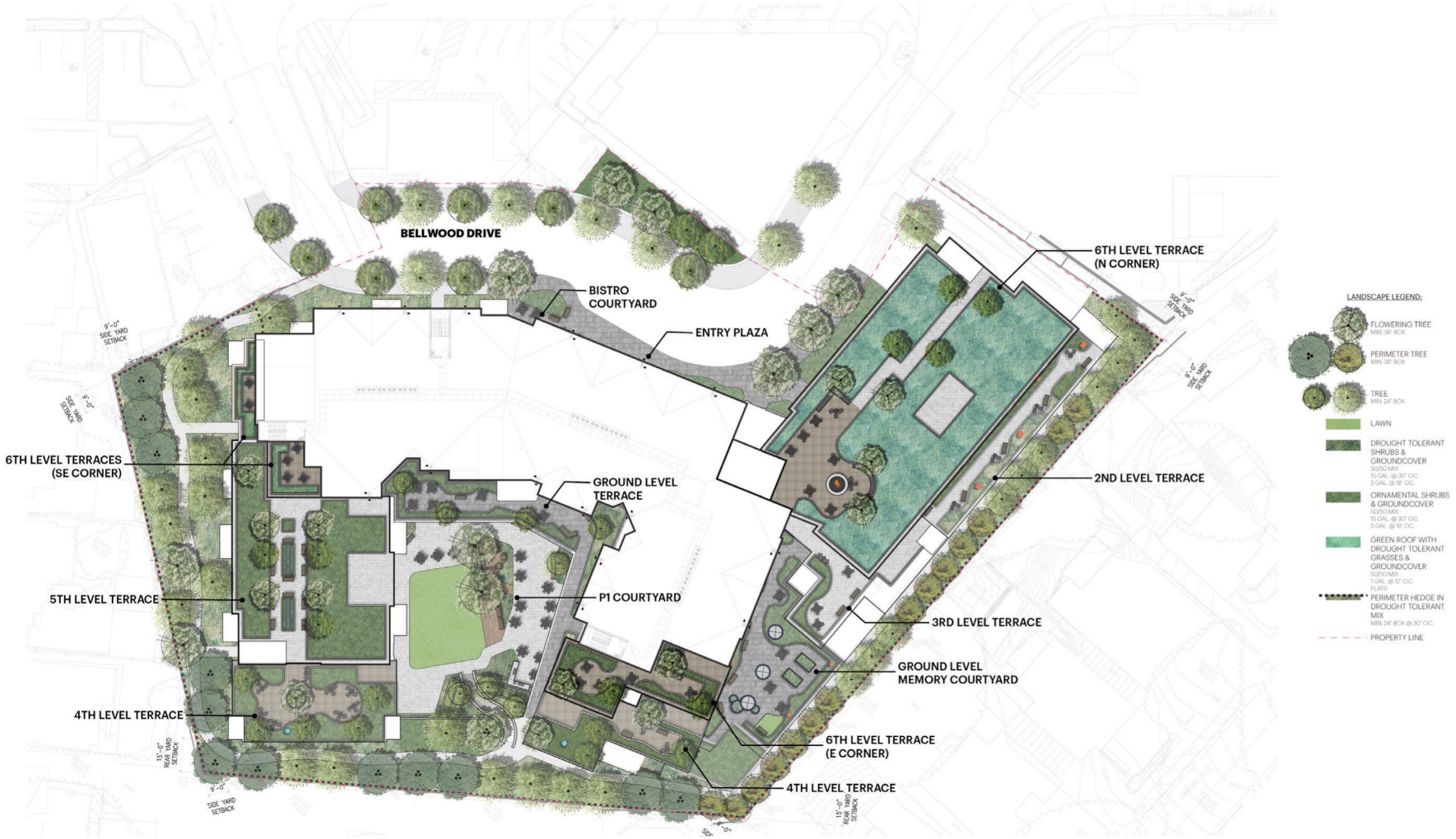

Figure A-12
Conceptual Landscape Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

Figure A-13
P1 Landscape Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

Figure A-14
Ground Floor Landscape Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

Figure A-15

Second to Sixth Floor Landscape Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

3.3.4 Access, Circulation, and Parking

Vehicular access would continue to be provided along Bellwood Avenue from Olympic Boulevard. However, as part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be vacated and realigned as a private street. Through public access would be maintained from both sides of Bellwood Avenue, and a vehicle turn-out adjacent to the building's lobby entrance would be provided along with sidewalk and streetscape improvements. Access to the subterranean parking would occur from one entry/exit driveway located along Bellwood Avenue near the northern boundary of the building, as shown in Figure 3 on page 14. Access for trash pickup and other freight vehicles would be provided via a service driveway located adjacent to the parking entry/exit driveway along Bellwood Avenue. Pedestrian access to the building would also be provided along Bellwood Avenue.

Based on the proposed land uses, the Project would be required to provide 81 vehicle parking spaces and 72 bicycle parking spaces (24 short term spaces and 48 long term spaces). The Project would provide 140 vehicle parking spaces, which would exceed LAMC requirements, and 72 bicycle parking spaces, which would meet LAMC requirements. These parking spaces would be located within two subterranean parking levels that would extend to a depth of 30 feet. The Project also would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

3.3.5 Lighting and Signage

Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Night lighting at the Project Site would be low profile and at the necessary intensity to provide a safe walkable environment along walking paths. Roof terrace lighting would be of similar light levels, directed downward towards walkable surfaces, and shielded from view of the adjacent residential neighbors. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and with the requirements of the LAMC. Proposed signage would include mounted project identity signage and general wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors.

3.3.6 Site Security

During construction of the Project, temporary security measures including security fencing, lighting, and locked entry would be implemented to ensure security of the Project Site. The following security features would also be incorporated in the Project design to enhance on-site safety:

- Design lobby areas to be visible from the public streets or entry ways.

- Design building entrances and exits, spaces around the building, and pedestrian walkways to be open and in view of surrounding sites.
- Design public spaces to be easily patrolled and accessed by safety personnel.
- Provide sufficient lighting of building entries and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.
- Provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.
- Provide gated access to parking facilities.
- Provide panic buttons within the parking facilities and parking area elevators.
- Include access controls in the form of private on-site security, a closed circuit security camera system, and keycard entry for the building and parking areas.
- Provide 24-hour security to monitor entrances and exits and manage and monitor the fire/life/safety systems.
- Display contact information for on-site security staff prominently throughout the Project Site.

3.3.7 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design.

3.3.8 Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing buildings. This phase would be followed by grading and excavation for the subterranean levels. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to begin in 2021 and be completed in 2023. It is estimated that approximately 74,800 cubic yards of export material would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 14.3.1, an Eldercare Facility Unified Permit to permit an eldercare facility to be located on a lot within the R3-1 and C2-1VL Zones where the eldercare facility does not meet the use, area, height, and setback provisions of the Zones. Specifically, to permit the following:

  - an eldercare facility use on the R3-zoned portion of the Project Site;
  - density averaging across the Project Site;
  - a maximum floor area ratio of 2.66:1 averaged across the Project Site;
  - a maximum building height of 70 feet for a portion of the proposed building, in lieu of the 45 feet otherwise permitted in the R3-1 and C2-IVL Zones; and relief from transitional height limitations for the portions of the building located within the C2 Zone;
  - over-in-height retaining walls (to be confirmed);
  - the sale and service of alcoholic beverages as an accessory use to the operation of the eldercare facility (or pursuant to LAMC 12.24.W.1 as a conditional use approval); and
  - access from a less restrictive zone to more restrictive zone for accessory uses such as parking.

- Pursuant to LAMC Section 16.05 and 14.3.1.B, Site Plan Review for a development project consisting of 50 or more of net new residential dwelling units and/or guest rooms;

- Pursuant to LAMC Sections 17.03 and 17.15, a Division of Land (Vesting Tentative Tract Map No. 82442) for the merger and resubdivision of the Project Site, merging all of the existing lots, including the merger of a portion of Bellwood Avenue; to designate yards such that the central northerly property line is designated as the front yard and the southernmost property line is designated as the rear yard and all other property lines would be designated as side yards; and a Haul Route Approval; and

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

INITIAL STUDY

4. ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth guidelines for evaluating project transportation impacts for transit-oriented infill projects under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[4]

The City's Zone Information and Map Access System (ZIMAS) identifies a portion of the Project Site as located within a TPA (Lots 33-37 of Block 13 of Tract 7260 and 10-13 of Block 14 of Tract 7260) while other portions of the Project Site are not currently identified as located within a TPA (Lots 29-32 of Block 13 of Tract 7260). As such, the potential aesthetics impacts of the Project are discussed herein and in the forthcoming EIR to be prepared for the Project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

[4] City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed January 25, 2019.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☒	☐	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a. Have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista is a panoramic view of a valued visual resource. Based on the City's 2006 L.A. CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. According to the L.A. CEQA Thresholds Guide, panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley mountain range, the ocean, or other water bodies.

As discussed in Section 3, Project Description, of this Initial Study, the Project Site includes parcels located generally north/west and east/south of Bellwood Avenue as well as the portion of Bellwood Avenue that bifurcates the Project Site. The portion of the Project Site located generally north/west of Bellwood Avenue is bounded by the Century Park hotel to the north, Bellwood Avenue and multi-family residential uses to the east and south, and a small commercial shopping center to the west that includes a cleaners and a smog check station. The portion of the Project Site located east and south of Bellwood Avenue is generally bounded by a Courtyard by Marriott hotel and Bellwood Avenue to the north, single-family residential uses to the east and south, and a beauty salon to the west. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available. Therefore, development of the Project would not have the potential to substantially or adversely affect a scenic vista since none currently exist. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project Site is not located along a state scenic highway. The nearest officially designated state scenic highway is California State Route 2 (SR-2), which is located approximately 25 miles northeast of the Project Site. In addition, the nearest officially eligible (not yet designated) state scenic highway is along the California State Route 1 (SR-1), approximately six miles west of the Project Site,[5] and the nearest City-designated scenic parkway is along Avenue of the Stars, approximately 0.6 mile northeast of the Project Site.[6] Thus, the Project would not substantially damage scenic resources within a designated scenic highway as there are no scenic highways along the Project Site. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within the West Los Angeles Community Plan area of the City of Los Angeles, in an urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of residential and commercial uses. The Project Site includes parcels located generally north/west and east/south of Bellwood Avenue as well as the portion of Bellwood Avenue that bifurcates the Project Site. The portion of the Project Site located generally north/west of Bellwood Avenue is bounded by the Century Park hotel to the north, Bellwood Avenue and multi-family residential uses to the east and south, and a small commercial shopping center to the west that includes a cleaners and a smog check station. The portion of the Project Site located east and south of Bellwood Avenue is generally bounded by a Courtyard by Marriott hotel and Bellwood Avenue to the north, single-family residential uses to the east and south, and a beauty salon to the west. Beyond the immediate surroundings of the Project Site are additional commercial and office uses along Olympic Boulevard, including a Ralph's grocery store located to the north and a Goodwill Donation Center to the west. Single- and multi-family residential uses continue east and south of the Project Site. In addition, the Project Site is currently developed with several multi-family residential buildings and associated structures and parking. Existing landscaping within the Project Site includes several ornamental shrubs and trees. Due to the urbanized and built out surroundings as well as the types of uses within and surrounding the Project Site, neither the Project Site nor its surroundings reflect an area of special scenic quality. Notwithstanding, the EIR for the Project will include further discussion regarding the Project's consistency with applicable zoning and other regulations governing scenic quality, including the City's General Plan Framework Element Urban Form and Neighborhood Design Chapter and the Citywide Design Guidelines.

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

Less Than Significant Impact. The existing ambient nighttime lighting environment within the Project Site and vicinity is typical of a developed, urban environment where the primary nighttime lighting sources include interior light spillage from buildings, vehicle headlights along roadways and in parking

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5 California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed November 13, 2018.

6 Mobility Plan 2035, Map A3, Citywide General Plan Circulation System—West Subarea.

areas, signage, street lamps, and security/parking lighting. Glare sources within the Project Site and vicinity include glass and metal, vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with residential uses, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Construction of the Project also has the potential to generate light and glare. The surrounding properties to the east, south, and north are generally single-family residences with views of the Project Site. The topography of the surrounding adjacent areas varies, providing different viewing aspects to the Project Site. Provided below is an analysis of the Project's potential impacts related to light and glare during construction and operation.

Construction

The Project's construction hours would comply with the Los Angeles Municipal Code (LAMC), which provides that construction activities be limited to the hours of 7:00 A.M. to 9:00 P.M. Monday to Friday and 8:00 A.M. to 6:00 P.M. on Saturday. Pursuant to the LAMC, no construction activities are permitted on Sundays. Given the nature of the construction labor force (with a typical eight-hour work day beginning at 7:00 A.M.), the majority of Project construction would occur during daylight hours. However, there is a potential that construction activities could require the limited use of artificial lighting during the winter season when daylight may not be sufficient earlier in the day. Outdoor lighting sources such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of proposed Project construction. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, construction lighting, while potentially bright, would be highly focused on the particular area undergoing work. Thus, with adherence to existing LAMC regulations, construction of the Project would not create a new source of substantial light which would adversely affect day or nighttime views in the area. Therefore, light impacts associated with Project construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Daytime glare could potentially accompany construction activities if reflective construction materials were positioned in highly visible locations where glare conditions (e.g., orientation and presence of glare-sensitive uses) could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities within each area of the Project Site. In addition, large surfaces that are usually required to generate substantial glare are typically not an element of construction activities. Furthermore, construction activities would be screened by temporary fencing and surrounding perimeter landscaping. As such, construction of the Project would not create a new source of substantial glare which would adversely affect day or nighttime views in the area. Therefore, glare impacts associated with Project construction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As discussed in Section 3, Project Description, of this Initial Study, the Project proposes the development of an eldercare facility consisting of 192 senior housing residential units; 50,463 square feet of indoor common areas that include space for supporting services, common dining areas, a gym, indoor pool and spa, wellness center, activity rooms, family/living rooms, and building lobby and reception area; and 14,630 square feet of outdoor common areas. The proposed uses would be located within a single

building ranging in height from 38 feet to 70 feet, or three to six stories. Three existing multi-family residential developments with a total of 112 residential units and 43,939 square feet would be removed to accommodate the Project. Overall, the Project would be designed to create a visually unified site with a new building designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area.

Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Night lighting at the Project Site would be low profile and at the necessary intensity to provide a safe walkable environment along walking paths. Roof terrace lighting would be of similar light levels, directed downward towards walkable surfaces, and shielded from view of the adjacent residential neighbors. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

The proposed lighting sources would be similar to other lighting sources on the Project Site and in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area. Any new outdoor lighting provided by the Project would be low-level and would not result in a substantive change in ambient illumination levels over existing conditions. In addition, outdoor security and architectural lighting would be shielded and directed onto building surfaces and towards the interior of the Project Site to avoid light spillover onto sensitive uses. Project lighting would also meet all applicable LAMC lighting standards. As required by LAMC Section 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

With regard to glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. Sun reflection can also occur with reflected light from parked vehicles. In general building materials would include smooth troweled stucco, composite metal wall panels with wood finish, limestone panels and glass. In addition, all parking would be provided in a subterranean parking garage. As such, there would be limited potential from glare associated with parked vehicles. Glass used in building façades would also be low-reflective or treated with an anti-reflective coating to minimize glare. It is also noted that there is a grade difference ranging between approximately 14 feet to 42 feet from the adjacent single-family residential uses along the southern and eastern boundaries of the Project Site, such that the Project Site is situated below the adjacent single-family residential uses. In addition, the backyards of these residential uses face the Project Site and include extensive existing landscaping. Further, the Project would incorporate additional perimeter landscaping to minimize views of the Project Site and any associated glare.

Based on the above, Project operation would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with multi-family residential buildings and associated parking areas. In addition, the uses surrounding the Project Site primarily include commercial and residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[7] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned as R3-1-O (Multiple Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling) which permit a variety of residential and commercial uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.[8] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with multi-family residential buildings and associated parking areas. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for residential and commercial uses. The Project Site is not zoned for forest land and is not used as forest land.[9] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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7 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018.

8 California Department of Conservation, Los Angeles County Williamson Act FY 2015/2016, 2016.

9 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As previously discussed above, the Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland or forest land. The Project Site and surrounding area are also not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[10] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. 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?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$],

[10] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018.

and lead[11]). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[12] With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on the SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

b. 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?

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the South Coast Air Basin, which is currently in non-attainment of federal air quality standards for ozone, $PM_{2.5}$ and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses. Therefore, the Project could expose sensitive receptors to additional pollutant concentrations and the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

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11 Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

12 SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses as the Project would primarily include residential uses. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[13] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[14]

Based on the above, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

[13] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed November 13, 2018.

[14] SCAQMD, Rule 402, Nuisance, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed November 13, 2018.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with three multi-family residential developments and associated parking. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife[15] or by the U.S. Fish and Wildlife Service[16] would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.[17] Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

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15 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, October 2017.

16 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed, accessed November 13, 2018.

17 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

No Impact. The Project Site is located in an urbanized area and is currently developed with three multi-family residential developments and associated parking. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.[18,19] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[20,21] In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the US Fish and Wildlife Service.[22,23,24] Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located in an urbanized area and is currently developed with three multi-family residential developments and associated parking. In addition, the surrounding area has been fully developed. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site.[25] As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently developed with three multi-family residential developments and associated parking. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent

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18 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018.

19 United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed November 13, 2018.

20 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

21 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

22 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://map.dfg.ca.gov/bios/, accessed November 13, 2018.

23 California Department of Fish and Wildlife, CDFW Lands, https://map.dfg.ca.gov/lands/, accessed November 13, 2018.

24 United States Fish and Wildlife Service, National Wetlands Inventory, https://www.fws.gov/wetlands/data/Mapper.html, accessed November 13, 2018.

25 United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed November 13, 2018.

to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[26, 27]

On-site trees and shrubs are ornamental in nature. A majority of the existing ornamental trees and shrubs will be removed during construction of the Project. Trees to be removed could potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 (Section 3503) states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the code and CDFW has not promulgated regulations interpreting these provisions. To ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project would require that tree removal activities would take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. These tree species are defined as "protected" by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from the City's Protected Tree Ordinance and are not considered protected. The City's Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree [...]" and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

As described in the Tree Survey included in Appendix IS-1 of this Initial Study, landscaping within the Project Site consists of 96 ornamental trees and shrubs, including eight street trees located within the portion of Bellwood Avenue proposed to be vacated and realigned, as well as ornamental trees whose trunks are on adjacent property but include roots and canopies on the Project Site. As provided in the Tree Survey, there are no trees on the Project Site that are considered protected by the City of Los Angeles Protected Tree Ordinance. Of the 96 ornamental trees identified on the Tree Survey, 65 trees

[26] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

[27] Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

would be removed as part of the Project, including eight street trees. In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis. In addition, pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the eight street trees to be removed would be replaced on a 2:1 basis. Removal of the existing street trees in the public right-of-way would occur in accordance with the policies of the Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with three multi-family residential developments and associated parking. As previously described, landscaping within the Project Site is limited, consisting of ornamental trees and shrubs. As discussed above, the Project Site does not support any habitat or natural community.[28,29] No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[30] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

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28 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018.

29 United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed December 10, 2018.

30 California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017.

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

Based on a review of the SurveyLA Historic Resources Survey Report—West Los Angeles Community Plan Area,[31] the HistoricPlacesLA database,[32] and the Los Angeles ZIMAS database, the Project Site, including the existing structures within the Project Site, has not been individually listed in or formally determined to be eligible for listing in the National Register or the California Register. In addition, the Project Site has not been designated as a Historic-Cultural Monument and is not located within an existing Historic Preservation Overlay Zone. Furthermore, as analyzed in the Historical Resource Assessment Report, prepared by Historic Resources Group and provided in Appendix IS-2, of this Initial Study, the existing buildings on the Project Site are not eligible for historic designation in the National Register, the California Register, or as City of Los Angeles Historic-Cultural Monuments. Therefore, as no historic resources are located within the Project Site, removal of the existing buildings within the Project Site and development of the Project would not create a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. In addition, the results of the archaeological records search conducted for the Project Site and included in Appendix IS-3 of this Initial Study indicate that there are no identified archaeological sites within the Project Site and one archaeological site located within a 0.5-mile radius of

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31 City of Los Angeles, SurveyLA, Historic Resources Survey Report—West Los Angeles Community Plan Area, August 2012.

32 City of Los Angeles, HistoricPlacesLA, www.historicplacesla.org/map, accessed January 11, 2019.

the Project Site. Nevertheless, the Project would require grading of the Project Site and excavations approximately 30 feet below grade, and previously unknown archaeological resources could be encountered. If an archaeological resource were to be discovered during construction of the Project, work in the area would cease, and deposits would first be evaluated for historic significance in accordance with CEQA Guidelines Section 15064.5. As set forth in CEQA Guidelines Section 15064.5, if the City determines that the archaeological resource is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code. If an archaeological resource does not meet the criteria for historical resources, but does meet the definition of a unique archaeological resource, construction work in the area would cease and the resource would be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. Therefore, given that there are no identified archaeological sites within the Project Site and the available regulations governing the treatment of any uncovered archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource. With the implementation of regulatory requirements, impacts to archaeological resources would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98. With the implementation of regulatory requirements, the Project would not disturb any human remains. Impacts related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site encompasses three existing multi-family residential developments totaling 112 units and 43,939 square feet. The Project would include 192 senior housing residential units and 50,463 square feet of common areas. The Project would comprise 241,754 square feet of floor area. Therefore, the Project may generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. First established in 2002 under Senate Bill 1078, California's Renewable Portfolio Standards require retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.[33] The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with Senate Bill 1078, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2016 Title 24 standards, which became effective on January 1, 2017.[34] The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.[35]

As previously described, the Project Site encompasses three existing multi-family residential developments totaling 112 units and 43,939 square feet. The Project Site does not include any renewable energy sources used by LADWP. In addition, as discussed in Attachment A, Project Description, of this Initial Study, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project's compliance with LADWP's plans for renewable energy as well as the Project's compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

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33 CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/RPS_Homepage/, accessed October 8, 2018.

34 CEC, 2016 Building Energy Efficiency Standards, www.energy.ca.gov/title24/2016standards/, accessed October 8, 2018.

35 CEC, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The following analysis is based on the Geotechnical Investigation prepared for the Project by Geocon West, Inc., dated May 31, 2018, as well as the Geology and Soils Report Approval Letter provided by the Grading Division of the Los Angeles Department of Building and Safety dated December 26, 2018. All specific information on geologic and soils conditions in the discussion below is based on the Geotechnical Investigation unless otherwise noted. The Geotechnical Investigation and the Geology and Soils Report Approval Letter are included as Appendix IS-4 of this Initial Study.

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 feet to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or a Fault Rupture Study Area.[36] The closest active fault is the Santa Monica Fault located approximately 0.5 mile from the Project Site. Furthermore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, since there are no known faults beneath the Project Site, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to rupture of a known earthquake fault. The Project also would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not result in the rupture of a known earthquake fault caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. Strong seismic ground?

Less Than Significant Impact. The Project Site is located within the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. As previously stated in Response to Checklist

[36] Los Angeles General Plan Safety Element, Exhibit A, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, November 1996, p. 47.

Question VII.a.i above, no active faults are known to pass directly beneath the Project Site and, therefore, the Project would not exacerbate existing environmental conditions (i.e., trigger an earthquake by disrupting a known earthquake fault) such that people or structures would be exposed to strong seismic ground shaking. In addition, the Project is located in a highly urbanized and fully developed area and these existing environmental conditions are not such that strong seismic ground shaking would be exacerbated by the Project. Furthermore, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions, including strong seismic ground shaking. Notwithstanding, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code (LABC). Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the LABC relating to seismic safety, and the application of accepted and proven construction engineering practices.

The Project would specifically comply with the LABC, which incorporates current seismic design provisions of the 2016 California Building Code (CBC), with City amendments, to minimize seismic impacts. The 2016 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the LABC, and the Project would be required to comply with the plan review and LADBS permitting requirements, including the recommendations provided in the LADBS Geology and Soils Report Approval Letter. Through compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not exacerbate existing hazardous environmental conditions related to strong seismic ground shaking, which could result in substantial adverse effects, including the risk of loss, injury, or death. Thus, impacts related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. As provided in the Geotechnical Investigation, neither the City of Los Angeles nor the State of California classifies the Project Site as part of a potentially liquefiable area.[37,38] In addition, subsurface soils at the Project Site are well-consolidated and dense, and would not be expected to

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[37] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018.

[38] State of California, California Geological Survey, Seismic Hazard Zones. Beverly Hills Quadrangle, March 25, 1999.

liquefy, even if water were present. Further, the historically highest groundwater level at the Project Site is greater than 40 feet below ground surface.[39] As discussed above in Response to Checklist Question No. VII.a.ii, development of the Project would not exacerbate existing conditions that would cause people or structures to be exposed to strong seismic ground shaking. Thus, the three conditions associated with the occurrence of liquefaction (i.e., shallow groundwater, low-density, sandy soils, and strong ground motion) do not all exist on the Project Site. As such, based on the underlying conditions of the Project Site, the Geotechnical Investigation concluded that the potential for liquefaction and associated ground deformation beneath the Project Site is very low. Therefore, the Project would not exacerbate existing environmental conditions that could cause seismic-related ground failure, including liquefaction. Impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Along the southern and eastern boundaries of the Project Site there is a grade difference from the adjacent single-family residential uses such that the Project Site is situated below the adjacent single-family residential uses. While the Project Site is sloped down from those single-family residential uses, the backyards of those single-family residential uses abut the Project Site and most of those yards are heavily landscaped and or feature a boundary wall. As such, large areas of exposed soil and/or rocks that could fall onto the Project Site would not typically exist within single-family residences. In addition, the Project Site is not located in a landslide area as mapped by the State,[40] nor is the Project Site mapped as a landslide area by the City of Los Angeles.[41,42] As discussed above, the Project would be required to comply with plan review and LADBS permitting requirements, including the recommendations provided in the LADBS Geology and Soils Report Approval Letter and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report. To the extent necessary, lateral support to adjacent properties will be maintained during Project construction and supported by shoring or retaining walls consistent with the recommendations of the Geology and Soils Report Approval Letter as appropriate. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is currently fully developed with buildings and surface parking areas. As such, there are no open spaces with exposed topsoil. However, development

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39 State of California, California Geological Survey, Seismic Hazard Zones. Beverly Hills Quadrangle, March 25, 1999.

40 State of California, California Geological Survey, Seismic Hazard Zones. Beverly Hills Quadrangle, March 25, 1999.

41 Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

42 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018.

of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential would be negligible since the Project Site would mostly remain fully developed. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. Along the southern and eastern boundaries of the Project Site there is a grade difference from the adjacent single-family residential uses such that the Project Site is situated below the adjacent single-family residential uses. Specifically, according to the Geotechnical Investigation, there is approximately a 10- to 15-foot increase in elevation from the rear of the Project Site to the properties to the south. The Project would require grading of the Project Site and excavations approximately 30 feet below grade. As discussed in the Geotechnical Investigation, due to the depth of proposed excavations and the proximity to the property lines, city streets, and adjacent off-site structures, excavation of the proposed subterranean levels would likely require sloping and shoring measures to provide a stable excavation. As set forth in the Geotechnical Investigation, where the proposed excavation would be deeper than an adjacent structure, the proposed shoring would be designed to resist the surcharge imposed by the adjacent off-site structures.

As discussed above, the Project Site is not located in a landslide area as mapped by the state, nor is the Project Site mapped as a landslide area by the City. In addition, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Additionally, while the Project Site is sloped down from the single-family residential uses along the rear of the Project Site, the backyards of those single-family residential uses abut the Project Site and most of those yards are heavily landscaped and/or feature a boundary/retaining wall. As such, large areas of exposed soil and/or rocks that could slide onto the Project Site would not typically exist within single-family residences.

Liquefaction-related effects include lateral spreading. Since the Project Site is not located in an identified liquefiable area, the potential for lateral spreading is low. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in lateral spreading.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site.

Therefore, there is little to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, impacts related to subsidence would be less than significant, and no mitigation measures are required.

As discussed above, according to the State of California Seismic Hazard Zones Map for the Los Angeles Quadrangle, the Project Site is not located within an area susceptible to liquefaction. Impacts associated with liquefaction would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events.[43] According to the Geotechnical Investigation, the Project Site is underlain by artificial fill and unconsolidated to semi-consolidated Pleistocene age alluvial and marine terrace deposits predominantly consisting of sand and sandy silt with occasional lenses of well graded sand and gravel. As described in the Geotechnical Investigation, artificial fill was encountered to depths of four to 10 feet beneath the existing ground surface. The artificial fill generally consists of sand and silty sand and can be characterized as slightly moist and medium dense. Pleistocene age alluvium and marine terrace deposits were encountered beneath the artificial fill. The alluvium generally consists of sand, sandy silt, and sand with silt with varying amounts of gravel and trace cobbles. The alluvial soils are characterized as slightly moist and medium dense to very dense or hard. Therefore, due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils.

Based on the above, the Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As described above, the soils underlying the Project Site are primarily sandy soils. In addition, as discussed in the Geotechnical Investigation, based on the granular nature of the underlying soils, the Project would not be prone to the effects of expansive soils. Therefore, the Project would not be located on expansive soil that would create a substantial direct or indirect risk to life or property. In addition, through standard construction practices involving excavation activities and the associated removal of underlying soils as well as the subsequent use of engineered soils, any potential effects associated with expansive soils would be addressed. As such, the Project would not increase the expansion potential of underlying soils. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

[43] Associated of Environmental & Engineering Geologists. Expansive and Collapsible Soil, www.aegweb.org/?page=ExpansiveSoil, accessed April 26, 2018.

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

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, a records search conducted for the Project Site included in Appendix IS-4 of this Initial Study indicates there are no previously encountered fossil vertebrate localities located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site. In the very western portion of the Project Site, there are surficial deposits of younger Quaternary Alluvium. These younger Quaternary deposits typically do not contain significant vertebrate fossils in the uppermost layers, but at relatively shallow depth there are older sedimentary deposits that may contain significant fossil vertebrate remains. In most of the Project Site though there are surficial deposits of older Quaternary Alluvium, with terrestrial deposits in the northeastern portion and nominally marine deposits in the central and southern portions of the Project Site. The closest vertebrate fossil locality in these older Quaternary sediments is LACM 5501, northeast of the Project Site south of Olympic Boulevard between Avenue of the Stars and Century Park East, that produced fossil specimens of pond turtle, dog, and horse at shallow but unstated depth. Near the intersection of Wilshire Boulevard and Bedford Drive, further northeast of the Project Site, localities LACM 3355 and 3821 produced specimens of fossil horse and even-toed ungulates at a depth of 40 feet below the surface. The locality LACM 5833, northwest of the Project Site south of Wilshire Boulevard between Thayer Avenue and Westholme Avenue, produced fossils of horse, kangaroo rat, wood rat, meadow vole, and pocket gopher at shallow but unstated depth. In summary, the paleontological records search indicates that grading or very shallow excavations in the uppermost layers of soil and Quaternary deposits in the Project Site are unlikely to discover significant vertebrate fossils. However, according to the paleontological records search, deeper excavations have the potential to encounter significant remains of fossil vertebrates. As discussed above, grading to a maximum depth of approximately 30 feet would occur within the Project Site. Thus, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure CUL-MM-1, below, a qualified paleontologist would be retained in the event paleontological materials are encountered, and grading and excavation activities in the area of the exposed material would be temporarily diverted or redirected to facilitate evaluation and, if necessary, salvage. With implementation of Mitigation Measure CUL-MM-1, the Project would not destroy a unique paleontological resource or site. Impacts to paleontological

resources would be less than significant with implementation of mitigation. No further analysis of this topic in an EIR is required.

CUL-MM-1: If paleontological materials are encountered during Project grading and excavation, a qualified paleontologist shall be retained by the Applicant, and grading and excavation in the area of the exposed material shall be temporarily diverted or redirected to facilitate evaluation by the paleontologist and, if necessary, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or vicinity. Therefore, the Project would not destroy any distinct and prominent geologic or topographic features. No impact related to distinct and prominent geologic or topographic features would occur, and no mitigation measures would be required. No further evaluation of this topic in the EIR is required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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

gas emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill [AB] 32 and the City of Los Angeles Green Building Code).

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based on the Phase I Environmental Site Assessment Report (Phase I ESA) and the Phase II Environmental Site Assessment Report (Phase II ESA) prepared for the Project by Converse Consultants, dated May 15, 2018, and May 31, 2018, respectively. The Phase I ESA and the Phase II ESA are included as Appendix IS-5 of this Initial Study.

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The types and amounts of hazardous materials to be used for the Project would be typical of those used during construction activities and those typically used in the operation of eldercare facilities, as discussed in the following analysis.

Construction

The Project would not involve the routine transport of hazardous materials to and from the Project Site during construction. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, existing regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction, and development of the Project on the Project Site would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Operation of the Project could also involve the routine

use of potentially hazardous materials typical of those used in a small medical facility, including biohazards waste and cleaning agents. As with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The current and past land uses within the Project Site were identified as part of the Phase I Environmental Site Assessment Report (ESA) to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the ASTM Standard Practice as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property.

As discussed in the Phase I ESA, based on available historical sources, from as early as 1894 to 1938, the Project Site was undeveloped. In 1940, building permits for 11 residential buildings and associated residential garages located on the southern parcels of the Project Site (south of Bellwood Avenue) were issued. By 1952, the 12th residential building, located on the northern parcel (north of Bellwood Avenue) had been constructed. The Project Site has remained in the same configuration since 1952.

The adjoining properties were primarily undeveloped land and/or developed for residential use from as early as 1894 to 1938. From as early as 1948, gas and oil service stations were located on two properties north of the Project Site, and one western adjoining property. The gas and oil service stations on the easternmost northern adjoining property (10326 West Olympic Boulevard) appear to have operated from as early as 1948 to 1985. That property was redeveloped by 1989 with the existing hotel building. The gas and oil service station located on the westernmost northern adjoining property (10344 W. Olympic Boulevard) appears to have operated from as early as 1948 to at least 1995. That property was then occupied by auto service and smog businesses from as early as 2000 to 2006, and by Michael's Cleaners from as early as 2006 to the present. The gas and oil service station on the western adjoining property (10350 West Olympic Boulevard) appears to have operated from as early as 1948 to 1998, when the underground storage tanks (USTs) were removed. That site was redeveloped with the existing retail building in 2012. The western adjoining property located at 10390 Bellwood Avenue has been occupied by salon businesses from as early as 1995 to the present. The remaining adjoining properties have remained in residential use since first developed in the 1920s through the 1940s.

Additionally, as provided in the Geotechnical Investigation, based on a review of the California Division of Oil, Gas and Geothermal Resources (DOGGR) Well Finder Website (DOGGR, 2018), the Project Site is located within the Cheviot Hills Oil Field. However, as discussed in the Phase I ESA,

according to DOGGR there are no wells located on the Project Site or adjacent properties. The nearest well to the Project Site is the Chevron U.S.A. Inc Well Number 321F, an inactive and plugged oil and gas production well, located approximately 1,600 feet to the east (DOGGR, 2018). Due to the voluntary nature of record reporting by the oil well drilling companies, wells may be improperly located or not shown on the location map. As such, though not anticipated, undocumented wells could be encountered during construction of the Project, which would need to be properly abandoned in accordance with the current requirements of the DOGGR.

The identification of a former gas and oil service station, located at the easternmost northern adjoining property (10236 West Olympic Boulevard), is not considered a REC as the site has since been redeveloped with a hotel and underground parking garage. Similarly, the identification of a former gas and oil service station at the western adjoining property located at 10350 West Olympic Boulevard is not considered a REC as the property was issued a case-closed designation in 2009, and the property has been redeveloped. However, the former gas and oil service station and auto repair operations on the westernmost northern adjoining property (10344 West Olympic Boulevard), and the existing dry-cleaning operations and smog and oil-change operations on the property are considered RECs. Tetrachloroethylene (PCE) was detected as recently as 2007 in wells located downgradient of the drycleaners which indicates that dry-cleaning operations may have impacted groundwater beneath the drycleaners and adjoining properties (including the Project Site). In summary, the Phase I ESA identified the following RECs:

- The identified presence of tetrachloroethylene (PCE) in soil-vapor at levels in excess of screening levels for residential land use.
- The identification of a former gas and oil service station and auto repair business on the northern adjoining property (10344 West Olympic Boulevard).
- The identification of an existing dry-cleaning business (Michael's Cleaners) and smog check and oil change business on the northern adjoining property (10344-10344 1/2 West Olympic Boulevard).
- The Project Site is located within a Methane Zone.
- A vapor encroachment condition exists for the Project Site.

Based on the identified RECs, a Phase II ESA, included in Appendix IS-5 of this Initial Study, was prepared to further evaluate the impacts to soil and soil vapor beneath the Project Site due to past and current operations at the northern adjoining property. The Phase II ESA also included an initial screening to evaluate whether methane was present in soil-vapor. Provided below is a summary of the findings of the Phase II ESA as well as an evaluation of other potential hazardous materials that may be present on the Project Site during construction and operation of the Project.

Construction

Hazardous Waste Generation, Handling, and Disposal

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and

caustic or acidic cleaners, could be used, and therefore, would require proper handling and management and, in some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, as previously discussed, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials used during construction.

As described above, a review of the State of California DOGGR Online Mapping System determined the Project Site is located within the Cheviot Hills Oil Field. However, as discussed in the Phase I ESA, according to DOGGR there are no wells located on the Project Site or adjacent properties. The nearest well to the Project Site is the Chevron U.S.A. Inc Well Number 321F, an inactive and plugged oil and gas production well, located approximately 1,600 feet to the east. Due to the voluntary nature of record reporting by the oil well drilling companies, wells may be improperly located or not shown on the location map. As such, though not anticipated, undocumented wells could be encountered during construction of the Project, which would need to be properly abandoned in accordance with the current requirements of the DOGGR. The Project Site is also located within a designated Methane Zone mapped by the City. Additionally, based on the RECs identified in the Phase I ESA, construction activities could encounter contaminated soil that would require proper handling and disposal.

As evaluated in the Phase II ESA, methane was detected in eight of the 12 soil vapor probes at a concentration of 0.1 percent (or 1,000 parts per million) during the initial round of monitoring conducted on May 1, 2018. It is noted that this concentration is equal to the minimum detection limit of the instrument, and that the meter was recalibrated prior to conducting the second round of readings on May 2, 2018. Methane was not detected in any of the soil vapor probes during the second screening. The soil vapor monitoring conducted at the Project Site did encounter tetrachloroethylene (PCE) and trichloroethylene (TCE) in excess of residential screening levels. However, the Phase II ESA determined that based on the levels encountered and implementation of applicable LADBS requirements, there would not be unacceptable health risk to occupants. In addition, adherence to standard construction safety measures, as well as compliance with California Occupational Safety and Health Act (OSHA) safety requirements, would serve to reduce the risk in the event that elevated levels of these soil gases are encountered during grading and construction.

As discussed in the Phase II ESA, in the soil samples analyzed, PCE was detected in just one sample at a concentration that is less than the residential screening level, and no other VOCs were detected in any of the samples analyzed. TPH in the heavy oil range was detected in three samples also below the residential screening level. TPH in the gasoline and diesel ranges were not detected in any of the soil samples. The likely source of the PCE concentration in soil is the adjacent dry-cleaning facility. The reported concentrations of oil range TPH could be related to the automotive service facilities on the north adjacent property. As concluded in the Phase II ESA, the soils at the Project Site do not appear to be significantly impacted and are believed to be acceptable for reuse onsite. In addition, based on the reported concentrations of VOCs and TPH in the soil samples analyzed, it is not anticipated that there would be any special handling or disposal requirements associated with soils that might be exported from

the Project Site during construction. In the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[44] Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered on-site.

Based on the above, construction of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with hazardous waste generation, handling, and disposal during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, no evidence of existing USTs or ASTs was observed on the Project Site. No other records were found that indicate the presence of USTs within the areas proposed for construction. Notwithstanding, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the potential removal of USTs during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs. Based on the age of the on-site buildings (i.e., constructed as early as 1940), asbestos-containing materials (ACMs) may be present on-site. Thus, in accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the removal of ACMs during demolition

[44] South Coast Air Quality Management District. Rules and Compliance, Rule 1166, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed November 8, 2018.

would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Based on the age of the on-site buildings, lead-based paint (LBP) may be present on-site. In the event that LBP is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the removal of LBP during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. As discussed above, no items containing PCBs were observed on-site. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the removal of PCBs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Operation

Hazardous Waste Generation, Handling, and Disposal

As discussed above, the soil vapor monitoring conducted at the Project Site did encounter tetrachloroethylene (PCE) and trichloroethylene (TCE) in excess of residential screening levels. As concluded in the Phase II ESA, the soils at the Project Site do not appear to be significantly impacted and are believed to be acceptable for reuse on site. Specifically, the Phase II ESA determined that based on the levels encountered and implementation of applicable LADBS requirements, there would not be unacceptable health risks to occupants. In addition, operation of the Project Site would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and

commercial uses. As stated previously, activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with applicable regulations and requirements, operational activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

Development of the Project includes residential senior housing and associated uses. The Project does not propose the installation of underground or aboveground storage tanks. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with underground and aboveground storage tanks during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts associated with asbestos or ACMs during operation of the Project would occur. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the Project would not expose people to LBP as no LBPs would be used. Thus, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with LBP during operation of the Project would not occur. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into

the environment, and no impacts related to PCBs during Project operation would occur. No further analysis of this topic in an EIR is required.

Oil Wells and Methane Gas

Oil Wells

The Project does not include the installation of new oil wells. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts associated with oil wells during operation would occur. No further analysis of this topic in an EIR is required.

Methane Gas

All new buildings and paved areas located within a Methane Zone would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790. Under this ordinance, the Project Site is categorized as a Level II Site Design due to the presence of volatile organic compounds and methane in soil vapor sampling and would be required to implement methane mitigation controls accordingly. As the permitting process would ensure that new development would comply with the City's Methane Mitigation Ordinance, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with the release of methane gas during operation would be less than significant. No further analysis of this topic in an EIR is required.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are no schools within one-quarter mile of the Project Site. However, the Project Site is located within 0.5 mile of Le Lycée Français De Los Angeles: Century City Campus at 10361 Pico Boulevard. Although the Project would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and impacts regarding the Project's emission or handling of hazardous materials and wastes would be less than significant. No mitigation measures and no further analysis of this topic in an EIR are required.

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

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since

1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. The Phase I ESA for the Project Site obtained a database search report from Environmental Risk Information Services (ERIS), dated May 8, 2018, which is included as Appendix E of the Phase I ESA. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. Based on the ERIS database records search, the Project Site is not listed on any hazardous materials or hazardous wastes databases. Therefore, impacts regarding this threshold would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is the Santa Monica Municipal Airport, located approximately 2.8 miles southwest of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster route to the Project Site is Olympic Boulevard, which is located approximately 70 feet to the north of the Project Site and provides arterial access and is in the immediate vicinity of the Project Site.[45] Adjacent to the Project Site, Bellwood Avenue is a u-shaped street that connects to Olympic Boulevard at each end. The Project Site includes parcels located generally north/west and east/south of Bellwood Avenue as well as the portion of Bellwood Avenue that bifurcates the Project Site. As described in Attachment A, Project Description, of this Initial Study, as part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be vacated and realigned as a private street. However, access to Olympic Boulevard would be maintained from both sides of Bellwood Avenue, including during construction. As such, the Project would not impair emergency access to Olympic Boulevard. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,[46] nor is it located within a

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45 Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

46 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

City-designated fire buffer zone.[47] Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Additionally, the proposed residential uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒

[47] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based, in part, on the *Hydrology and Water Quality Technical Memorandum* (Hydrology and Water Quality Memorandum) prepared for the Project by Fuscoe Engineering, Inc., dated May 2019 and included as Appendix IS-6 of this Initial Study.

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As provided by the following analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

As previously noted, below-grade parking would extend to a depth of approximately 30 feet. Data from the California Division of Mines and Geology indicate the historic high groundwater level on the

Project Site is greater than 40 feet below ground surface.[48] Therefore, Project construction activities are not expected to encounter groundwater which could require dewatering.[49] While dewatering during construction is not anticipated, in the event groundwater is encountered during construction, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the NPDES permit. These temporary systems would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of the SWPPP and implementation of an erosion control plan as required by the LAMC, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs onsite for the volume of water produced by the 85th percentile storm event. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use or biofiltration planter BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. As discussed in the Hydrology and Water Quality Memorandum, the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Project Site and the elimination of pollutant runoff up to the 85th percentile storm event. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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48 State of California, California Geological Survey, Seismic Hazard Zones. Beverly Hills Quadrangle, March 25, 1999.

49 Dewatering operations are practices that discharge non-stormwater from a work location into a drainage system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements.

Groundwater Quality

Construction

As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are not expected to encounter groundwater and temporary dewatering is not expected to be required. In the event groundwater is encountered during construction, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the NPDES permit. These temporary systems would comply with all relevant NPDES requirements related to construction. As such, groundwater quality would not be impacted from dewatering activities.

Other potential effects to groundwater quality could result from the presence of an underground storage tank (UST) or during the removal of an UST. As previously described, no existing USTs are anticipated to be found beneath the Project Site that could require removal during construction. Therefore, the removal of USTs would not pose a significant hazard on groundwater quality.

There are also risks associated with oil wells impacting groundwater quality. As discussed in detail above, according to the State of California Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR) Online Mapping System, the Project Site is located within the Cheviot Hills Oil Field. However, as discussed in the Phase I ESA, according to DOGGR there are no wells located on the Project Site or adjacent properties, and the nearest well to the Project Site is the Chevron U.S.A. Inc Well Number 321F, an inactive and plugged oil and gas production well, located approximately 1,600 feet to the east of the Project Site. Due to the voluntary nature of record reporting by the oil well drilling companies, wells may be improperly located or not shown on the location map. As such, although not anticipated, undocumented wells could be encountered during construction of the Project, which would need to be properly abandoned in accordance with the current requirements of the DOGGR. Additionally, based on the RECs identified in the Phase I ESA, construction activities could encounter contaminated soil that would require proper handling and disposal. If located, wells would be unearthed and inspected by the DOGGR to assess and prescribe abandonment procedures based on their observed condition. Furthermore, in the event contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[50] Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to groundwater quality associated with potential oil wells and/or contaminated soil.

As previously discussed, during on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater. In addition, as there are no existing groundwater production wells or public water

[50] South Coast Air Quality Management District. Rules and Compliance, Rule 1166, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed November 8, 2018.

supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. However, as discussed above, the Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are not expected to encounter groundwater and temporary dewatering would not be required. In addition, dewatering during operation is also not anticipated. As such, the Project would not substantially deplete groundwater supplies as a result of dewatering activities.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. According to the Hydrology and Water Quality Memorandum, the Project Site is comprised of approximately 89 percent impervious surfaces under existing conditions. Therefore, the degree to which surface water infiltration and groundwater recharge would occur on-site is negligible. With implementation of the Project, the amount of landscaped area would increase, resulting in a decrease in the amount of impervious surfaces on the Project Site to approximately 87 percent. The increase in pervious areas would improve the groundwater recharge capacity of the Project Site over existing conditions. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

Based on the above, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the

local groundwater table level. Therefore, impacts on groundwater supplies would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above in Response to Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

The Project Site is comprised of approximately 89 percent impervious surfaces under existing conditions. With implementation of the Project, the amount of landscaped area would increase, resulting in a decrease in the amount of impervious surfaces on the Project Site to approximately 87 percent. As such, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. There are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Response to Checklist Question X.a, the Project would be required to obtain coverage under the

NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As discussed in the Hydrology and Water Quality Memorandum, the Project Site is comprised of approximately 89 percent impervious surfaces under existing conditions. With implementation of the Project, the amount of landscaped area would increase, resulting in a decrease in the amount of impervious surfaces on the Project Site to approximately 87 percent. This increase in pervious surfaces would result in a reduction in stormwater runoff. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that on-site or off-site flooding would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. As discussed in the Hydrology and Water Quality Memorandum, stormwater runoff from the Project Site is collected and conveyed on Bellwood Avenue, where water flows in a northwest direction into two catch basins. These two catch basins flow westerly into a 63-inch storm drain that runs parallel to Olympic Boulevard. As discussed above, development of the Project would result in an increase in the landscaped areas throughout the Project Site and would reduce the amount of impervious surfaces on the Project Site from approximately 89 percent to approximately 87 percent. Accordingly, there would be a decrease in runoff volumes into the existing storm drain system. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.[51,52] Thus, the Project

[51] Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1595F, effective September 26, 2008.

[52] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.[53,54] In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin or within a potential inundation area.[55] The Project Site is located approximately six miles east of the Pacific Ocean, and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[56] Therefore, no tsunami or tsunami events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Hydrology and Water Quality Memorandum, the Project Site is located within the Ballona Creek Watershed. The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the Total Maximum Daily Load (TMDL) milestones. A draft EWMP for the Ballona Creek Watershed, prepared with the City of Los Angeles as the lead coordinating agency, is in the process of review by the LARWQCB. The objective of the EWMP Plan is to determine the network of control measures (often referred to as best management practices [BMPs]) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. The Project Site, located in the Sepulveda Channel Sub-watershed, falls within the Ballona Creek EWMP and ultimately discharges into Reach 2 of Ballona Creek. According to the State Water Resources Control Board (SWRCB), Ballona Creek Reach 2, which is between National Boulevard and Centinela Avenue, is listed as an impaired water body. Impairments for Ballona Creek Reach 2 include trash, toxic pollutants, bacteria, metals, and sediment.

Potential pollutants generated by the Project would be typical of residential land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The

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53 Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1595F, effective September 26, 2008.

54 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

55 Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

56 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for Ballona Creek. In addition, development of the Project would result in an increase in the landscaped areas throughout the Project Site and would reduce the amount of impervious surfaces, from approximately 89 percent to approximately 87 percent. The increase in pervious areas would improve the groundwater recharge capacity of the Project Site over existing conditions. Since the Project's LID BMP design is for biofiltration, treated runoff would be discharged into the storm drain system, away from the structures and groundwater table.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

a. Physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site includes parcels located generally north/west and east/south of Bellwood Avenue. The Project Site is currently developed with three multi-family residential developments and includes the portion of Bellwood Avenue that bifurcates the Project Site. Bellwood Avenue is a u-shaped street that connects to Olympic Boulevard at each end. The Project would replace the existing multi-family residential uses within the Project Site with a new residential eldercare facility. Additionally, as part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be vacated and realigned as a private street. However, through access would be maintained, and access to Olympic Boulevard from adjacent properties along Bellwood Avenue would continue to be available. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Project Site is located within the R3-1 and C2-1VL Zones with a Neighborhood Commercial land use designation under the West Los Angeles Community Plan and the City's General Plan. The Project's proposed Eldercare Facility use is permitted within the C2 zone. In the R3 zone, Senior Independent Living and Assisted Living Care are permitted uses, and Alzheimer's/Dementia Care Housing and Eldercare Facilities are permitted with an Eldercare Facility Unified Permit pursuant to LAMC Section 14.3.1 (Public Benefits) . Thus, in conjunction with the approval of the Eldercare Facility Unified Permit, the Project would be consistent with the existing zoning and land use designation of the Project Site, and the Project does not require a Zone Change or a General Plan Amendment. While the Project would not be anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, the EIR will provide further analysis of the Project's consistency with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.[57,58,59] The Project Site is, however, located within a City-designated oil field or oil drilling area.[60] In addition, as discussed in Attachment A, Project Description, of this Initial Study, the Project Site's zoning indicates the Project Site is located within an Oil Drilling District where the drilling of oil wells

[57] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

[58] State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

[59] City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

[60] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

or the production from the wells of oil, gases, or other hydrocarbon substances is permitted. According to the California Division of Oil, Gas and Geothermal Resources (DOGGR), the Project Site is also located within the limits of the Cheviot Hills Oil Field.[61] However, as discussed in the Phase I ESA, according to DOGGR there are no wells located on the Project Site or adjacent properties. The nearest known oil well is located approximately 1,600 feet east of the Project Site, and this oil well is currently inactive and plugged. Furthermore, the Project Site does not currently include any oil drilling activities. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.[62,63,64] While the Project Site is located within a City-designated oil field or oil drilling area[65] as well as within the limits of the Cheviot Hills Oil Field,[66] according to DOGGR there are no wells located on the Project Site or adjacent properties, and the nearest known oil well is approximately 1,600 feet east of the Project Site and is currently inactive and plugged. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐

61 California Department of Conservation, Division of Oil, Gas and Geothermal Resources, 2018, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#close, accessed November 13, 2018.

62 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

63 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

64 City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

65 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

66 California Department of Conservation, Division of Oil, Gas and Geothermal Resources, 2018, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#close, accessed November 13, 2018.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources may increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is the Santa Monica Municipal Airport, located approximately 2.8 miles southwest of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned 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 people or housing, necessitating the construction of replacement housing elsewhere?	☒	☐	☐	☐

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

Less Than Significant Impact. The Project would remove three existing multi-family residential developments with a total of 112 residential units and would construct 192 senior housing residential units, including 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. While the Project would result in a net increase of 80 residential units compared to existing conditions, the proposed type of units are not typically associated with a substantial increase in population growth. Specifically, the Project proposes 46 studio guest rooms, 94 one-bedroom dwelling units, and 52 two-bedroom dwelling units, and as an eldercare facility, the Project would be for persons age 62 and older. Assuming occupancy of one person per bedroom, the Project would provide housing to approximately 244 people. The actual net increase in population would be less with the replacement of the existing residential units. Therefore, the Project would not induce substantial population growth in the area. With regard to infrastructure, all circulation improvements planned as part of the Project are intended to improve circulation flows and safety throughout the Project Site and vicinity. Any utility and other infrastructure improvements that may be required by the Project would be necessary to connect the proposed uses to the existing main infrastructure system. Therefore, the Project also would not indirectly induce substantial unplanned population growth in the area. Impacts related to population growth would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Potentially Significant Impact. The Project Site is currently developed with three multi-family residential developments with a total of 112 units that would be removed as part of the Project. The Project would construct 192 senior housing residential units, including 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms, resulting in a net increase of 80 residential units compared to existing conditions. As an eldercare facility, the Project would provide a different type of residential use than the existing buildings at the Project Site. Eldercare facilities serve a

senior population while the existing housing units are not age-restricted. Therefore, further analysis of this topic will be included in the EIR.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Fire protection?

Potentially Significant Impact. The City of Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and would introduce a new residential type, eldercare residential facility, which could result in the need for additional fire protection services. Therefore, further analysis of this issue will be included in the EIR.

b. Police protection?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would introduce a new residential type to the Project Site, eldercare residential facility, which could result in the need for additional police services. Therefore, the EIR will provide further analysis of this issue.

c. Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.[67] The Project Site is

[67] Los Angeles Unified School District, Board of Education Districts Maps 2015-2016, http://achieve.lausd.net/Page/8652, accessed December 13, 2018.

located in Local District–West.[68] The nearest school to the Project Site is Westwood Charter Elementary, located approximately 0.9 mile southwest of the Project Site at 2050 Shelby Avenue. As discussed in Attachment A, Project Description, of this Initial Study, the Project would construct an eldercare facility for persons 62 years of age or older that would include 192 senior housing residential units. While the Project would include residential uses, these residential uses are not the types of residential uses that would generate school-aged children and a corresponding demand for school services in the vicinity of the Project Site. Therefore, the development of the Project would not directly increase the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully removes Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

d. Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks (RAP). The closest park and recreational facility to the Project Site is the Cheviot Hills Recreation Center, located approximately 0.8 mile southeast of the Project Site at 2551 Motor Avenue. The Cheviot Hills Recreation Center includes a swimming pool, tennis courts, a playground, an archery range, classes for children and adults, and an 18-hole golf course. As previously described, the Project would involve the construction of an eldercare facility for persons 62 years of age or older that would include 192 residential units consisting of 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. This type of use is not typically associated with a substantial increase in the use of nearby parks as many of the residents rely on some form of care. Rather, these types of facilities generally provide a wide variety of activities and amenities onsite. Specifically, as described in Attachment A, Project Description, of this Initial Study, the Project would provide 14,630 square feet of usable common and private open space, exceeding the LAMC-required amount of open space of 7,800 square feet . The proposed open space amenities include a 6,490 square foot courtyard on Level P1 and a 2,740 square-foot terrace on the ground level. The P1 level would also provide 27,532 square feet of indoor common areas including a wellness center, gym, indoor pool and spa, common dining areas, and activity rooms. In addition, an outdoor terrace would be provided on each level between Level 2 and Level 6 for assisted living and independent living residents. Therefore, due to the amount, variety, and availability of the proposed open space and recreational amenities to be provided within the Project Site, it is anticipated that Project residents would utilize the on-site open space and common areas to meet their recreational needs.

In addition, while it is possible that some of the Project's new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the nature of the employee's work. It is anticipated that the majority of Project employees, such as nurses, social workers, and

[68] Los Angeles Unified School District, Board of Education Local District—West Map, July 2015.

caretakers, would be more likely to use parks and recreational facilities near their homes during non-work hours. Furthermore, it is anticipated that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site and who already generate a demand for parks. As such, the potential indirect growth in demand for parks and recreational facilities would be minimal.

Based on the above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

e. Other public facilities?

Less Than Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.[69] The Project area is served by existing libraries within the West Los Angeles Community Plan area, including the Palms-Rancho Park Branch Library, located 1.8 miles south of the Project Site.

As discussed in Attachment A, Project Description, of this Initial Study, the Project would result in the removal of three existing multi-family residential developments with a total of 112 dwelling units. The Project's proposed 192 residential units would be comprised of 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. Based on the type of residential uses proposed, the Project would not be expected to generate a substantial increase in the use of the Palms-Rancho Park Branch Library. Rather, the demand on library services may actually decrease as not all residents would be physically able to travel to the library. In addition, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. As such, any direct or indirect demand for library services generated by Project employees would be negligible. The Project would not substantially increase the demand for library facilities and would not require the provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. Therefore, impacts on library facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

[69] Los Angeles Public Library, Library Directory.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. There are numerous public parks and recreational facilities within 2 miles of the Project Site. The closest major park to the Project Site is Cheviot Hills Recreation Center, which includes a swimming pool, tennis courts, a playground, an archery range, classes for children and adults, and an 18-hole golf course. It is located approximately 0.8 mile southeast of the Project Site. As previously described, the Project would involve the construction of an eldercare facility for persons 62 years of age or older that would include 192 residential units consisting of 71 senior-independent dwelling units, 75 assisted-living guest rooms, and 46 memory-care guest rooms. This type of use is not typically associated with a substantial increase in the use of nearby parks and recreational facilities as many of the residents rely on some form of care and a wide variety of activities and amenities are provided on site. As discussed above, the Project's demand for parks and recreational facilities would be offset by the 14,630 square feet of usable open space that would be provided on-site. Due to the nature of the eldercare facility use, and the amount and availability of the proposed open space and recreational amenities within the Project, it is anticipated that Project residents would generally utilize on-site open space and common areas to meet their recreational needs. Thus, while some of the Project's residents may be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project would not include the construction of recreational facilities or require the expansion of recreational facilities, as discussed above in Response Checklist Question XIV.d. Thus, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d. Result in inadequate emergency access?	☒	☐	☐	☐

a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. Construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the majority of the 192 senior housing residential units provided by the Project would be occupied by residents in greater need of on-site services and care. As such, these residents would be less likely to use the area's transportation and parking facilities. Nonetheless, the Project's employees and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. Therefore, further analysis of this issue will be provided in the EIR.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?[70]

[70] While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix

Potentially Significant Impact. As previously discussed, the proposed eldercare facility residents would be less likely to use the area's transportation facilities compared to existing residents. Nonetheless, the Project's employees and visitors would generate vehicle trips throughout the day. As such, this topic will be further evaluated in the EIR. The analysis would be based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of level of service (LOS) to evaluate the traffic impacts of a project.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. As discussed in Attachment A, Project Description, of this Initial Study, as part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be realigned as a private street. Generally, Bellwood Avenue serves as vehicular access to the lots that comprise the Project Site. There are also five commercial uses, four of which front onto Olympic Boulevard, that currently have driveway access on Bellwood Avenue. The Project would not result in any change to the existing access to these commercial properties on Bellwood Avenue or to the public street segments of Bellwood Avenue adjacent to these properties. The portion of Bellwood Avenue that bifurcates the Project Site would be replaced with a private drive and entry motor court that provides access to the proposed eldercare facility. The private drive is designed to allow for continued through access from both sides of Bellwood Avenue for pedestrians and vehicles, with a vehicle turn out located adjacent to the facility's lobby entrance for convenient pick-up and drop-off. As noted above, through access would be maintained from both sides of Bellwood Avenue through the Project Site, and the existing intersections of Bellwood Avenue and Olympic Boulevard would not be affected by the proposed realignment. The proposed realignment would not introduce any sharp curves or involve incompatible uses. Further, the proposed realignment of Bellwood Avenue would be subject to review and approval of the Los Angeles Department of Transportation and Bureau of Engineering. Thus, potential impacts related to a substantial increase in hazards due to a geometric design feature or incompatible uses would be less than significant and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

d. Result in inadequate emergency access?

Potentially Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster route to the Project Site is Olympic Boulevard, which is approximately 70 feet north of the Project Site and provides arterial access to the Project Site and surrounding uses.[71] While it is expected that construction activities for the Project would primarily be confined on-site, the Project's construction activities may potentially cause the closure of travel lanes in adjacent off-site streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. In addition, as part of the Project, existing site access would be modified. Therefore, further analysis of this issue will be provided in the EIR.

G Checklist Question. Thus, the analysis is based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project.

71 Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the

geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations up to approximately 30 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand and wastewater generation, further analysis of this issue in an EIR will be provided.

With regard to storm water drainage, as discussed above in Checklist Question X, Hydrology and Water Quality, the Project would result in an increase in pervious surfaces and an associated decrease in stormwater flows. As such, the Project would not require or result in the relocation or construction of new or expanded storm water drainage.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's increase in the amount of developed floor area on the Project Site, the Project has the potential to result in an increased demand for water provided by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

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

Potentially Significant Impact. See Response to Checklist Question XVIII.a, above.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.[72] Ten Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County.[73] In addition, there are

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[72] Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

[73] County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019. The 10 Class III landfills within the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

Based on the most recent 2017 Countywide Integrated Waste Management Plan Annual Report, the four Class III landfills open to the City of Los Angeles[74] had a combined total remaining capacity of 149.77 million tons as of December 31, 2017. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 55.71 million tons of remaining capacity and an average daily in-County disposal rate of 1,057 tons per day.[75] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[76]

Based on the 2017 Countywide Integrated Waste Management Plan Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2032 will not exceed the 2017 remaining permitted Class III landfill capacity of 149.77 million tons. The 2017 Countywide Integrated Waste Management Plan Annual Report evaluated six scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with five of the six scenarios. The 2017 Countywide Integrated Waste Management Plan Annual Report scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The 2017 Countywide Integrated Waste Management Plan Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling; expand existing landfills; study, promote, and develop alternative technologies; expand transfer and processing infrastructure; and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[77] The City of Los Angeles is currently diverting 76 percent of its waste from landfills.[78] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

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74 Class III landfills open to the City of Los Angeles include Antelope Valley, Chiquita Canyon, Lancaster, and Sunshine Canyon landfills.

75 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

76 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

77 City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed December 13, 2018.

78 LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=18850686489149411#!, accessed December 13, 2018.

Construction

The Project Site is currently developed with several multi-family residential buildings and associated structures and parking. Specifically, the Project Site encompasses three multi-family residential developments totaling 112 units and 43,939 square feet.

Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table 2 below, after accounting for mandatory recycling, the Project would result in approximately 764 tons of construction and demolition waste. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Table 2
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/sf)[a,b]	Total (tons)[b]
Construction Waste			
Residential (192 units)	241,754 sf	4.38	529
Demolition Waste			
Residential (112 units)	43,939 sf	115	2,526
Total for Construction and Demolition Waste			***3,056***
Total After 75-Percent Recycling			**764**

du = dwelling unit

lbs = pound

sf = square feet

[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, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

[b] *Used conversion of 1 ton = 2,000 pounds. Numbers have been rounded.*

Source: Eyestone Environmental, 2018.

As shown in Table 3 on page 91, upon full buildout, the Project would generate approximately 527 tons of solid waste per year. When accounting for the existing multi-family residential uses to be removed, the Project would result in a net increase in solid waste generation of 277 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of

Table 3
Estimated Project Solid Waste Generation

Building	Size	Employee Generation Rate per sf[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing					
Residential	112 du	N/A	N/A	2.23/du/year	250
Total Existing					**250**
Proposed					
Residential	192 du	N/A	N/A	2.23/du/year	428
Eldercare Facility Support Staff[c]	100 emp	N/A	100 emp	0.99/emp/year	99
Total with Implementation of Project					**527**
Total Net Increase					**277**

du = dwelling unit

emp = employees

sf = square feet

[a] *Employee Generation Rates from Los Angeles Unified School District Developer Fee Justification Study, March 2017, Table 14.*

[b] *Residential solid waste generation rates are from the City's L.A. City CEQA Thresholds Guide. Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002.*

[c] *Used the "Services-Medical & Health" industry group from the City's Waste Characterization and Quantification Study. This includes support staff that would also be involved in the maintenance and use of the common areas that include space for supporting services, common dining areas, a gym, indoor pool and spa, wellness center, activity rooms, family/living rooms, and building lobby and reception area.*

Source: Eyestone Environmental, 2018.

waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[79]

The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.0002 percent of the remaining capacity (149.77 million tons) for the County's Class III landfills open to the City of Los Angeles.[80]

[79] LA Sanitation, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=3608041245788654&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D3608041245788654%26_afrWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed December 13, 2018.

[80] (277 tons per year/149.77million tons) x 100 ≈ 0.0002%

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[81] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[82] The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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81 Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

82 Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,[83] nor is it located within a City-designated fire buffer zone.[84] Therefore, the Project

[83] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed November 13, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. However, as discussed above, the Project's potential environmental impacts for the following subject areas will be further analyzed in the EIR: aesthetics; air quality; energy; greenhouse gas emissions; land use and planning; noise; population and housing; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities (water and wastewater).

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[84] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: aesthetics; air quality; energy; greenhouse gas emissions; land use and planning; noise; population and housing; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities (water, wastewater, and energy).

With regard to agriculture and forest resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts.

As discussed above, the Project would not result in any significant impacts to historic resources. Thus, the Project would not contribute to any cumulative impacts associated with historic resources. In addition, due to their site-specific nature, impacts related to archaeological and paleontological resources and human remains are typically assessed on a project-by-project basis. The Project vicinity is located within an urbanized area that has been disturbed over time. In the event that archaeological resources and human remains are uncovered, the Project and each related project would be required to comply with regulatory requirements governing the treatment of any uncovered archaeological resources or human remains. Furthermore, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established, as necessary, to address the potential for uncovering of paleontological resources. Therefore, Project impacts to archeological and paleontological resources and human remains would not be cumulatively considerable and would be less than significant.

Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, state, and federal regulations and standards for seismic safety. In addition, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or underlain by an existing fault and would not exacerbate any existing seismic environmental conditions. Thus, Project impacts related to geology and soils would not be cumulatively considerable and would be less than significant.

Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials.

Therefore, with adherence to applicable regulations, Project impacts with regard to hazards and hazardous materials would not be cumulatively considerable and would be less than significant.

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements. In addition, construction projects greater than one acre would be subject to NPDES permit requirements, including development of a Stormwater Pollution Prevention Plan, Standard Urban Stormwater Mitigation Plan requirements during operation, and other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, Project impacts related to hydrology and water quality would not be cumulatively considerable and would be less than significant.

With regard to public services such as schools, libraries, and parks, based on the type of residential uses proposed, the Project would not be anticipated to contribute to a cumulative demand for schools, libraries, and parks and recreation. Specifically, as the Project would not result in any increase in the number of school children in the LAUSD school system, the Project would not generate an increased demand for new or physically altered school facilities. Also, some related projects would be required to pay a school developer impact fee, which would offset any potential impact to schools associated with the related projects. As discussed above, the Project would not create a substantial demand on library services and facilities based on the type of residential uses proposed. Rather, the demand on library services may actually decrease as not all residents would be physically able to travel to the library. Furthermore, the Project and the related projects would not be expected to result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the nearby facilities would occur or be accelerated. The related projects would also be required to provide open space and recreational amenities or comply with the parks and open space requirements established by the LAMC, which would offset any potential impacts to parks and recreation facilities associated with development of related projects. Therefore, cumulative impacts with regard to schools would not occur as a result of the Project, and Project impacts to parks, recreation facilities, and libraries would not be cumulatively considerable and would be less than significant.

With regard to solid waste, given the urbanized and built-out nature of most of the City, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. Additionally, the demand for landfill capacity is continually evaluated by the County through preparation of the Countywide Integrated Waste Management Plan annual reports. Each annual Countywide Integrated Waste Management Plan report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2016 Countywide Integrated Waste Management Plan Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2031). The preparation of each annual Countywide Integrated Waste Management Plan provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: aesthetics; air quality; energy; greenhouse gas emissions; land use and planning; noise; population and housing; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities (water and wastewater). As a result, these potential effects will be analyzed further in the EIR.