# Getty Center Parking Improvement Project

Case Number: ENV-2019-1666-MND

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**Project Location:** 1200 N. Getty Center Drive, Los Angeles, California 90049

**Community Plan Area:** Brentwood–Pacific Palisades

**Council District:** 11—Bonin

**Project Description:** The J. Paul Getty Trust (Applicant) is proposing new landscaped surface parking areas and ancillary improvements on two existing, graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center (Project). The area for surface parking and ancillary improvements totals approximately 3.06 acres and is located on a portion of multiple parcels and former Caltrans property remnants that total approximately 287.8 acres. Approximately 39,312 square feet of landscaped area is also proposed within the Project Site.

The Project would provide a combined total of approximately 217 automobile parking spaces within the Project Site. The Project is designed to provide supplementary parking for use by staff, contractors, visitors, and buses. In addition, the Project is designed to reduce wildfire related threats in the Santa Monica Mountains and involves extending water conveyance infrastructure under the access road leading to the Project Site, where fire hydrants will be installed to provide additional water infrastructure for firefighters in the event of emergency. The Project also includes a restroom station and lighting. The restroom station would include a one-story approximately 250-square-foot structure. A bench, water fountain, trash and recycling receptacles, parking ticket machine and emergency phone also would be provided within each of the two parking areas. For security, the Project would enclose portions of the north and west sides of the Project Site with a black vinyl–covered chain link fence 6 feet in height. In addition, the Project would install a steel bar picket fence three feet six inches in height at the north and south ends of an existing drainage channel. Along the eastern property line at the Caltrans I-405 freeway right-of-way, the existing 50-inch or taller concrete freeway barrier and wall topped with a 46-inch small mesh security fence will remain without modification. It is estimated that construction would require approximately 3,500 cubic yards of earthwork consisting of approximately 1,400 cubic yards of soil export and 2,100 cubic yards of soil import.

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

**PREPARED BY:**
Eyestone Environmental, LLC

**APPLICANT:**
The J. Paul Getty Trust

**April 2022**

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# 1 INTRODUCTION

An application for the proposed Getty Center Parking Improvement Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles (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/MND evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study/MND 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). This Initial Study/MND is intended as an informational document, which is 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 (MND) is appropriate.[1] If the Initial Study concludes that neither a Negative Declaration nor MND is appropriate, an Environmental Impact Report is normally required.

[1] A MND is a type of Negative Declaration prepared for a project when the Initial Study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed Initial Study and MND are released for public review would avoid the effects or mitigate the effects to a point where no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole of the record before the Lead Agency that the project, as revised, may have a significant effect on the environment.

## 1.2 ORGANIZATION OF THE INITIAL STUDY/MND

This Initial Study/MND is organized into sections as follows:

### 1. INTRODUCTION

Describes the purpose and content of the Initial Study/MND 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, 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.

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that the Project would not have a significant effect(s) on the environment, and therefore this MND has been prepared.

As set forth in Section 15072 of the CEQA Guidelines, the City, as the Lead Agency for the Project, will provide a notice of intent to adopt a MND to the public, responsible agencies, trustee agencies, and the county clerk to allow the public and agencies to review the proposed MND. Pursuant to Section 15105 of the CEQA Guidelines, the public review period for a proposed negative declaration or MND shall be not less than 20 days (or 30 days when a proposed negative declaration or MND is submitted to the State Clearinghouse for review by state agencies).

# 2 EXECUTIVE SUMMARY

| | |
|---|---|
| **PROJECT TITLE** | **Getty Center Parking Improvement Project** |
| ENVIRONMENTAL CASE NO. | ENV-2019-1666-MND |
| RELATED CASES | DIR-2019-1665-PUB |

| | |
|---|---|
| **PROJECT LOCATION** | **1200 N. Getty Center Drive** |
| COMMUNITY PLAN AREA | Brentwood–Pacific Palisades |
| GENERAL PLAN DESIGNATION | Public Facilities and Minimum Residential land uses |
| ZONING | PF-1XL and RE40-1-H |
| COUNCIL DISTRICT | 11 |

| | |
|---|---|
| **LEAD AGENCY** | **City of Los Angeles** |
| CITY DEPARTMENT | Department of City Planning |
| STAFF CONTACT | Esther Serrato |
| ADDRESS | 200 North Spring Street, Room 721, Los Angeles, CA 90012 |
| PHONE NUMBER | (213) 978-1211 |
| EMAIL | esther.serrato@lacity.org |

| | |
|---|---|
| **APPLICANT** | **The J. Paul Getty Trust, Attn: Stephen W. Clark** |
| ADDRESS | 1200 Getty Center Drive, Los Angeles, CA 90049 |
| PHONE NUMBER | (310) 440-7300 |

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with implementation of the mitigation measures included in this MND.

| | | |
|---|---|---|
| ☐ 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.

## 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.

## MITIGATION MEASURES

Biological Resources

**MM-BIO-1:** The Project Area shall be demarcated with visible fencing in order to ensure the construction activities remain within the Project Site.

**MM-BIO-2:** General wildlife surveys shall be completed no more than 48 hours prior to commencement of construction activities to assess the presence of special-status wildlife in the Project Site. If wildlife is found, individuals would be allowed to leave the site on their own.

# 3 PROJECT DESCRIPTION

## 3.1 PROJECT SUMMARY

The J. Paul Getty Trust (Applicant) is proposing new landscaped surface parking areas and ancillary improvements on two existing, graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center (Project) located in the Brentwood–Pacific Palisades Community Plan (Community Plan) area of the City of Los Angeles (City). The area for surface parking and ancillary improvements totals approximately 3.06 acres (Project Site) and is located on a portion of multiple parcels and former Caltrans property remnants that total approximately 287.8 acres. The Project Site is currently vacant, except for storm water infrastructure that provides drainage for the site and adjacent hillside. The graded area on the southern portion of the Project Site is referred to as Oak Parking Lot A (South), and the graded area on the northern side of the Project Site is referred to as Oak Parking Lot B (North), collectively referred to as the Oak Parking Lots.

The Project would provide approximately 106 automobile parking spaces within Oak Parking Lot A (South) and approximately 111 automobile parking spaces within Oak Parking Lot B (North), for a combined total of approximately 217 automobile parking spaces within the Project Site. The Project is designed to provide supplementary parking for use by Getty Center staff, contractors, visitors, and buses. The Getty Center's existing parking structures and parking configuration provides parking for only 14 buses. When needed, the Project would be able to accommodate a minimum of nine additional buses, which would reduce the number of automobiles that could use the automobile parking spaces in the new parking areas. Specifically, when accommodating nine buses, Oak Parking Lots A and B's automobile parking capacity would be reduced by about 61 spaces, leaving approximately 156 spaces for automobiles. In addition, the Project would develop 30 percent of the Project's parking spaces as electric vehicle (EV) ready with at least 10 percent of the parking spaces installed with EV-charging stations. Specifically, the Project would include 24 EV-charging stations for vehicles and two electric shuttle or bus charging stations.

The Project also includes a restroom station along with water conveyance infrastructure, fire hydrants and lighting. The restroom station, which would be located within Oak Parking Lot A (South), would include a one-story approximately 250-square-foot structure.[2] A bench, water fountain, trash and recycling receptacles, parking ticket machine and emergency phone also would be provided within each of the two parking areas. The Project is designed to reduce wildfire related threats in the Santa Monica Mountains and involves extending water conveyance infrastructure under the access road leading to the Project Site, where fire hydrants will be installed to enable the Los Angeles Fire Department (LAFD) to use the parking lot areas to help protect the surrounding communities from fire danger in the event of a wildfire. The Getty Center also will make the new parking areas available to

[2] Except where otherwise noted, square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as: "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."

LAFD and other emergency responders as a staging area in the event of an emergency, like other areas on the Getty Center property. In addition to the proposed development, approximately 39,312 square feet of landscaped area is also proposed within the Project Site.

No deep excavation would occur with the deepest grading at between 5 and 5.5 feet occurring only on approximately 0.025 percent of the Project Site with the vast majority of the Project Site experiencing grading of less than 1 foot. It is estimated that construction would require approximately 3,500 cubic yards of earthwork consisting of approximately 1,400 cubic yards of soil export and 2,100 cubic yards of soil import. Additionally, it is anticipated that the haul routes to and from the Project Site would be through the Caltrans southbound I-405 freeway shoulder, which would avoid needing to use Sepulveda Boulevard or other City streets for haul truck traffic.

## 3.2 ENVIRONMENTAL SETTING

### 3.2.1 Project Location

The Project Site is located within the Brentwood–Pacific Palisades Community in the City of Los Angeles. As shown in Figure 1 on page 9, the Project Site is located to the north of the entrance of the Getty Center, which is accessible via Getty Center Drive from Sepulveda Boulevard. As shown in Figure 1, the Project Site is specifically bounded by the Santa Monica Mountains (open space) to the north, the San Diego Freeway (I-405) to the east, Getty Center Drive to the south, and the Santa Monica Mountains to the west.

### 3.2.2 Existing Conditions

As shown in Figure 2 on page 10, the Project Site comprises two graded areas located immediately to the north of the Getty Center entrance. The Oak Parking Lot A (South) area consists of approximately 1.47 acres and the Oak Parking Lot B (North) area consists of approximately 1.59 acres, for a total Project Site area of approximately 3.06 acres.

The Project would convert the two graded areas, currently owned by the J. Paul Getty Trust, into landscaped surface parking areas containing up to 217 parking spaces. Caltrans previously used the 3.06-acre site as a construction staging area for the I-405 Freeway Sepulveda Pass Widening Project. As part of this use, the access road from Getty Center Drive to the Project Site was widened to 24 feet to accommodate fire truck access. The Project Site also was graded as part of this prior work. The Project Site is currently unpaved and contains storm drain infrastructure for the site and the adjacent hillside. The Project Site is separated from the I-405 Freeway by 50-inch-high concrete barriers topped with a 46-inch mesh security fence, for a total barrier height of 8 feet.

Condition 17 of the Getty Center's 1985 Conditional Use Permit (CPC-1984-441 (CU)) required it to provide a minimum of 1,300 vehicle parking spaces for the Getty Center. Visitor parking at the Getty Center is currently available in a seven-level parking structure located in the Getty Center's arrival area, and is accessible directly via Getty Center Drive from Sepulveda Boulevard. This main parking structure currently provides 1,180 vehicle parking spaces. Getty Center visitors who park in the main structure are able to access the Getty Center at the top of the hill via use of the Getty Center Tram or

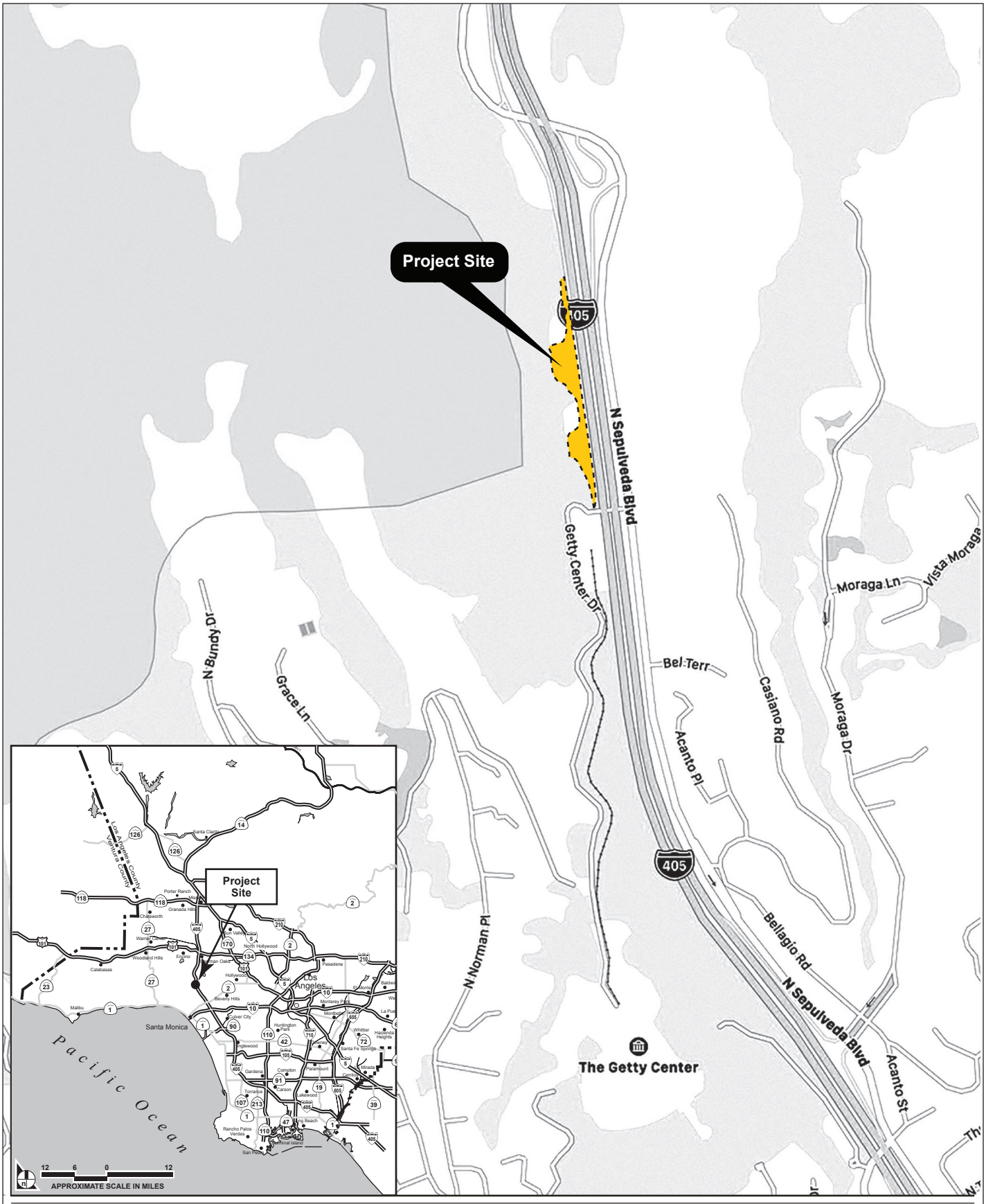


**Figure 1**
Project Location Map

Source: LAUSD, Master Planning and Demographics Branch Facilities Services Division, July 2015.


**Figure 2**
Aerial Photograph of the Project Vicinity

Source: Apple Maps, 2020; Eyestone Environmental, 2020.

shuttles. Additional parking for 363 cars is available in a parking garage at the top of the hill. Therefore, parking at the Getty Center currently exceeds the 1985 Conditional Use Permit's 1,300-space minimum by 243 spaces. By providing an additional approximately 217 parking spaces on the Project Site, the Project would result in the Getty Center providing approximately 1,760 parking spaces in total (i.e., a total of 460 spaces above the 1985 Conditional Use Permit's minimum parking requirements).

The Project Site is located within the Brentwood–Pacific Palisades Community Plan; a portion of the City's General Plan Land Use Element. Under the Community Plan, the Project Site is designated for Public Facilities and Minimum Residential land uses. The Project Site is zoned by the LAMC as PF-1XL (Public Facilities, Height Zone 1XL) and RE40-1-H (Residential Estate with a minimum lot area of 40,000 square feet, Height Zone 1, Hillside).

Land uses permitted or conditionally permitted in the PF zone include museums as a Public Benefit; public parking facilities located under freeway rights-of-way; farming and nurseries under power transmission rights-of-way; fire stations and police stations; government buildings, structures, offices and service facilities; public libraries not located inside public parks; post offices and related facilities; public health facilities; and public elementary and secondary schools. In Height Zone 1XL buildings are generally limited to a maximum height of 30 feet, two stories, and a permitted floor area ratio of 3:1. However, these limits do not apply to buildings within the PF zone.

Land uses permitted or conditionally permitted in the RE zone include single-family dwellings; museums as a Public Benefit; public elementary and secondary schools; parks, playgrounds, or community centers; truck gardening and the keeping of equines, poultry, rabbits, and chinchillas in conjunction with the residential use of a lot; accessory buildings, including private garages, accessory living quarters, servant's quarters, recreation rooms, or private stables; and backyard beekeeping as an accessory use. Height Zone 1 in the RE zone generally limits buildings to a maximum height of 45 feet and a permitted floor area ratio of 3:1. However, because of the Hillside (H) designation, the permitted height within an RE40 zone is 30 to 36 feet and the permitted residential floor area ratio is 0.35:1 at a slope band percentage of zero to 14.99 percent (generally level).

### 3.2.3 Surrounding Land Uses

As shown in Figure 2 on page 10, the Getty Center is located above the west side of the Sepulveda Pass and the I-405 Freeway in the Santa Monica Mountains. The Getty Center is generally surrounded by natural open space and single-family residences. The Project Site, located down the hill from the main Getty Center facilities and north of the Getty Center's arrival area, is bounded by the Santa Monica Mountains to the north, the I-405 to the east, Getty Center Drive and the Getty Center's arrival area to the south, and the Santa Monica Mountains to the west. Other uses located in the vicinity of the Project Site include the Leo Baeck Temple located southeast of the Project Site, across both Sepulveda Boulevard and the I-405, and single-family residential uses further east of the I-405.

Primary regional access is provided by the I-405, which is located adjacent to the Project Site and is accessible via Sepulveda Boulevard. Major arterials providing regional access to the Project Site include Sepulveda Boulevard.

The Project Site is served by Metro Rapid Line 734 and Metro Local Line 234, which stop next to the Getty Center entrance located at the intersection of Getty Center Drive and Sepulveda Boulevard.

## 3.3 DESCRIPTION OF PROJECT

### 3.3.1 Project Overview

In addition to providing supplementary parking for the Getty Center, the Project was designed specifically to help reduce potential wildfire hazards in the Sepulveda Pass, improve the flow of cars into the Getty Center, reduce the number of bus trips to and from the Getty Center, ensure site security and beautify a former construction site with ample landscaping.

As shown in Figure 3 and Figure 4 on pages 13 and 14, respectively, the Project would provide approximately 106 automobile parking spaces within the Oak Parking Lot A (South) area and approximately 111 automobile spaces within the Oak Parking Lot B (North) area, for a combined total of approximately 217 new automobile parking spaces within the Project Site. The proposed surface lots would be able to accommodate a up to 217 automobiles, or nine buses and 156 automobiles, or a combination thereof. In addition, Oak Parking Lot A (South) would include a restroom station. As shown in Figure 5 on page 15, the restroom station would include a one-story approximately 250-square-foot structure, a bench, water fountain, and trash and recycling receptacles. The restroom station and ancillary improvements would be located in the area where a Getty-operated shuttle would pick up passengers to transport them either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). The area would be shaded with a cantilevered canopy extending out from the restroom structure and a large oak tree. Similarly, as shown in Figure 6 on page 16, Oak Parking Lot B (North) would include a bench, water fountain, and trash and recycling receptacles and a large oak tree for shade in the area where a Getty-operated shuttle would pick up passengers. Each parking area would include a parking ticket machine as well as a blue light emergency phone, and fire hydrants will be installed within the Project Site to enhance LAFD resources in the event of a community emergency. The surface parking areas are proposed to be open seven days a week, from 5:00 A.M. until 11:00 P.M., and would be monitored by cameras and security patrols 24 hours a day. Since the Project Site is only accessible to vehicles that already have entered the Getty Center property via Getty Center Drive, the parking areas will not be accessible to the public when the Getty's front gate on Sepulveda Boulevard is closed.

### 3.3.2. Fire Prevention

The Project Site is located within a City-designated Very High Fire Hazard Severity Zone and within a City-designated fire buffer zone. Accordingly, the Project is designed to reduce wildfire related threats in the Santa Monica Mountains in several ways. First, the Project provides increased access in the Sepulveda Pass area for LAFD and other emergency responders. The Project involves extending water conveyance infrastructure under this access road into the Project Site, where fire hydrants will be installed to enable LAFD to use the parking lot areas to help protect the surrounding communities from fire danger. The Getty also will make the new parking areas available to LAFD and other emergency responders as a staging area in the event of an emergency, like other areas on the Getty Center property. In addition, the Applicant will install drought tolerant landscaping and irrigation on the Project Site, which will help reduce the risk of fire in and around the parking areas.

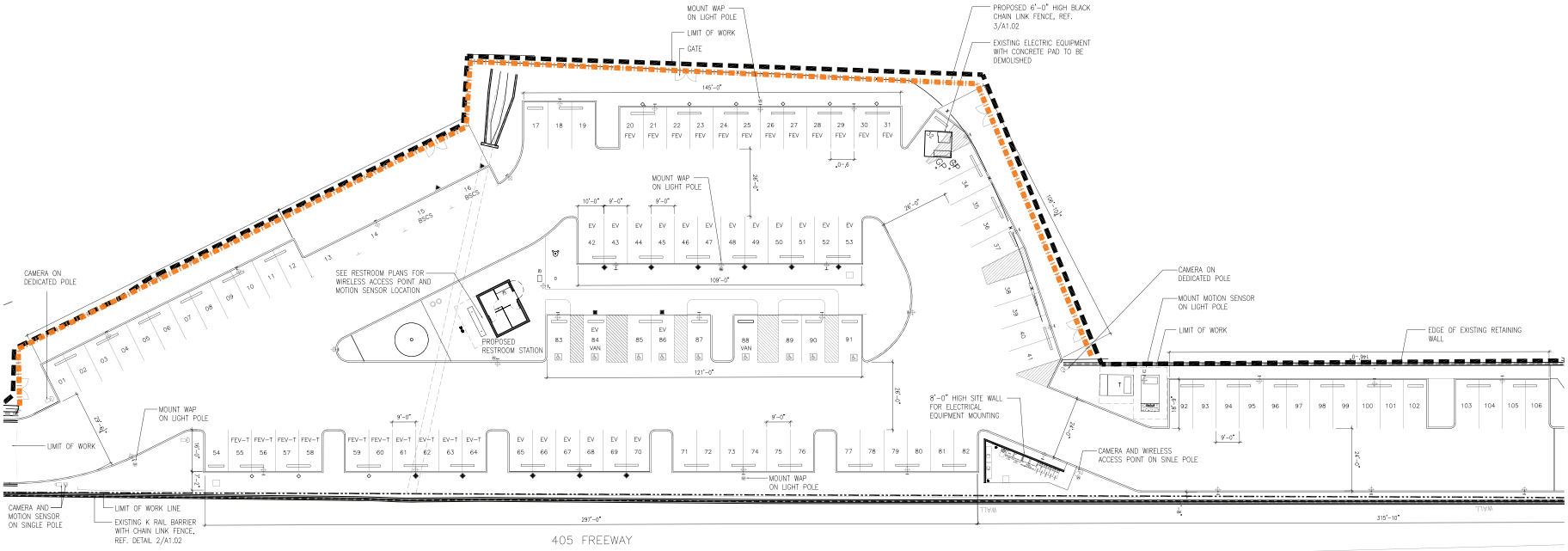


**Figure 3**
Oak Parking Lot A (South)

Source: Frederick Fisher and Partners, 2021.

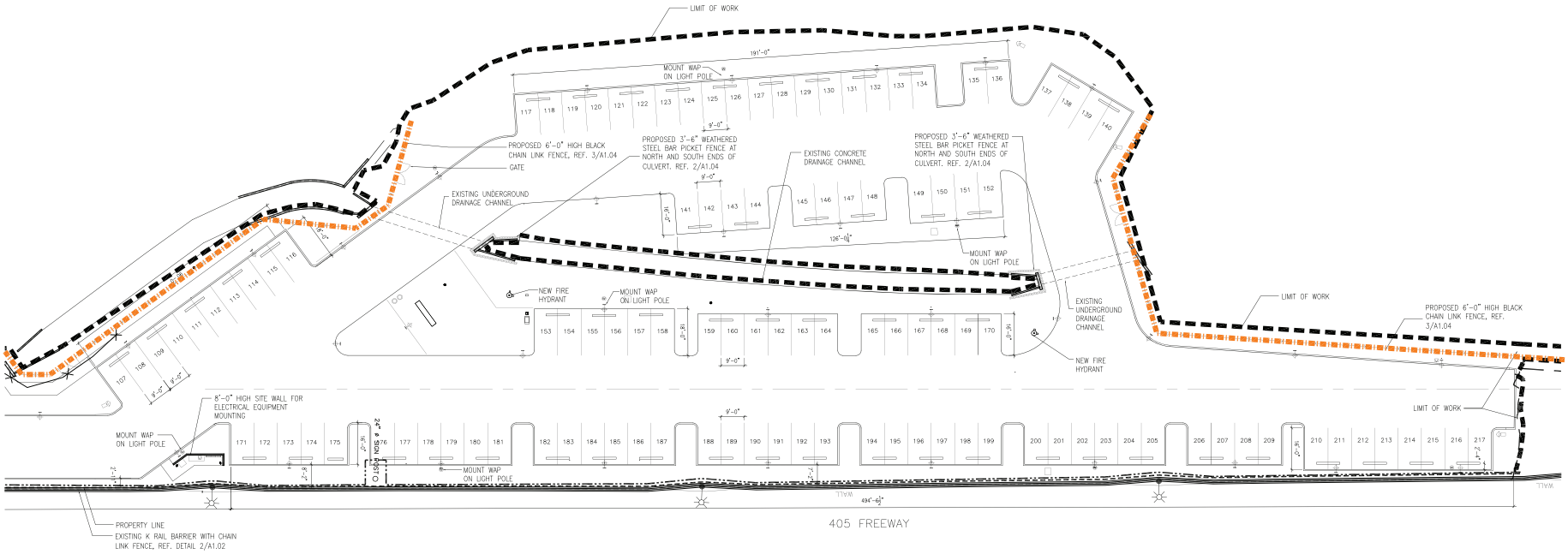


**Figure 4**
Oak Parking Lot B (North)

Source: Frederick Fisher and Partners, 2021.

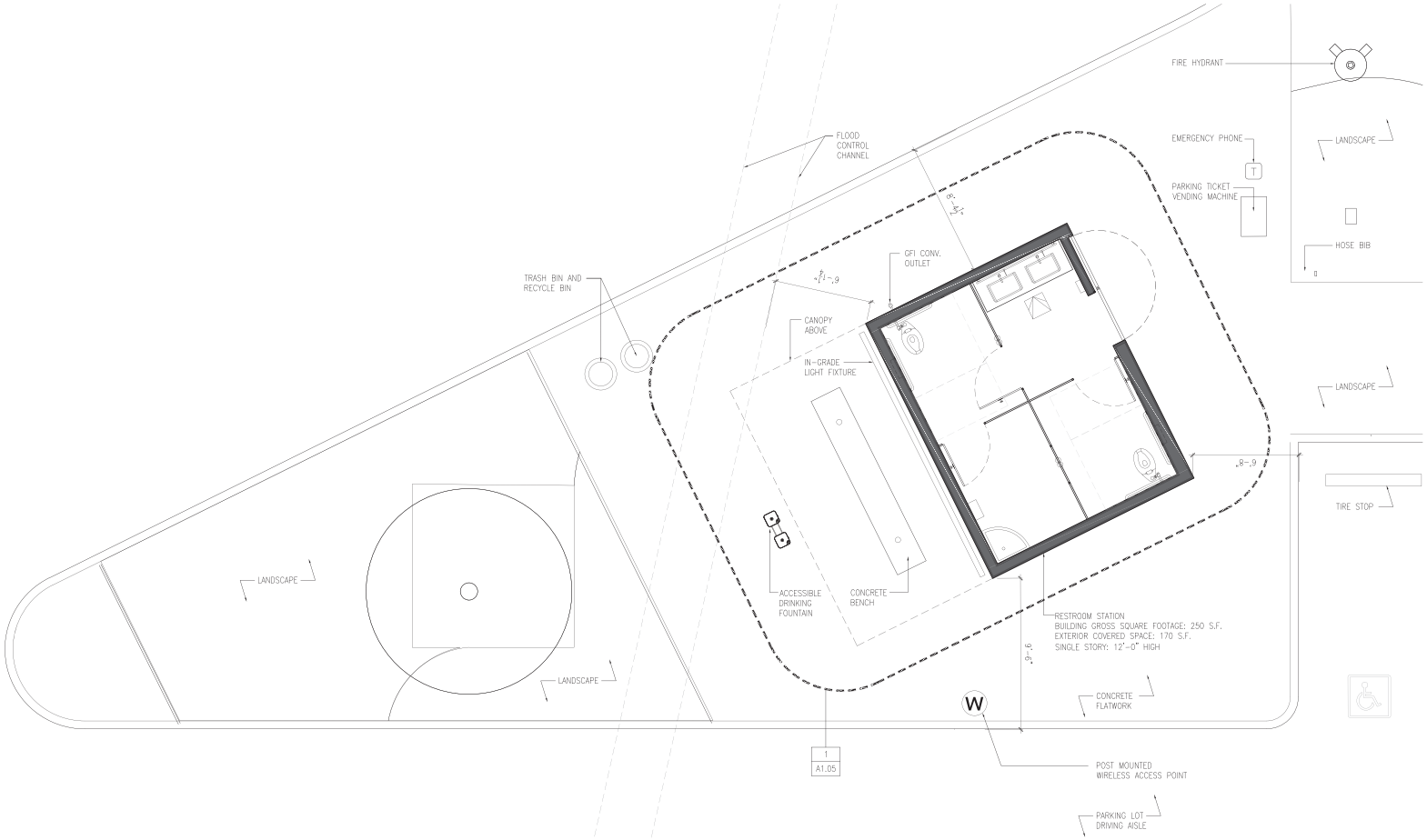


**Figure 5**
Oak Parking Lot A (South) Enlarged

Source: Frederick Fisher and Partners, 2020.

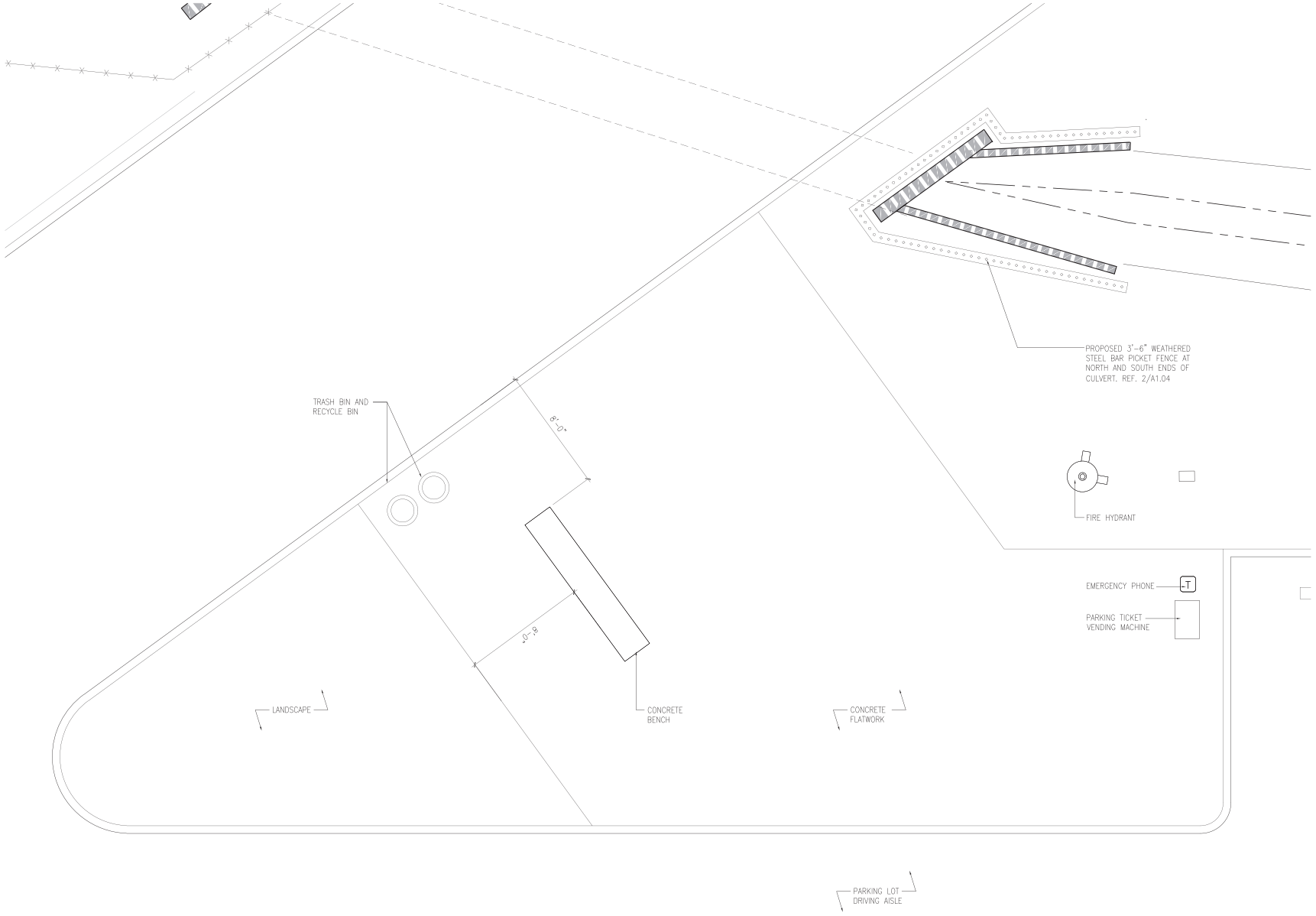


**Figure 6**

Oak Parking Lot B (North) Enlarged

Source: Frederick Fisher and Partners, 2020.

### 3.3.3 Access and Circulation

Vehicular access to the Project Site would be provided via Getty Center Drive from Sepulveda Boulevard. The Project Site is intended for vehicular access only, and therefore bicyclists would continue to access the Getty's bicycle parking facilities from Getty Center Drive adjacent to the existing parking structure.

Pedestrian access to and from the Project Site would not be available. Specifically, once visitors have parked their vehicles in Oak Parking Lot A (South) or Oak Parking Lot B (North), a Getty-operated shuttle would transport those visitors either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). Shuttle service also would be provided to return visitors to their cars in the new parking areas.

The Project would build upon existing traffic improvement efforts (e.g., transportation demand management program; alternative work schedules for staff; automated parking system; additional access points; and designated turn-around location for shuttles, taxis, rideshare vehicles, and visitors) by providing additional parking capacity at the Getty Center. The Oak Parking A Lot (South) and Oak Parking Lot B (North) areas would be primarily used by Getty Center vendors and staff to help maintain available parking in the Getty's main parking structure for visitors on peak days (which primarily occur over the winter holidays and summer break). Accordingly, this additional capacity will help reduce queuing on Sepulveda Boulevard by enabling vehicles to get into the Getty Center campus faster, and disbursed into either the main parking structure or the Oak Parking Lots. In addition, the new Oak Parking Lots would be available to provide onsite parking for up to nine additional buses, in addition to the 14 buses that can already be accommodated onsite. Additional bus parking helps to ensure that buses will not leave the Getty Center property after dropping off their passengers, which will prevent buses from traveling back out onto Sepulveda or into nearby residential neighborhoods.

### 3.3.4 Lighting, Signage, and Site Security

The Project would introduce new lighting within the Project Site for safety, security and visibility, including along the perimeter of the Project Site, in the center of the surface parking areas, and near the restroom station. Specifically, the Project proposes the installation of approximately 78 light poles throughout the Project Site. The proposed light poles would be typical of light poles used in surface parking areas and would use 29-watt energy-efficient light-emitting diode (LED) lighting, directed down to the ground and box-shielded. The light poles would be 10 feet in height. Structure entryways also would be well illuminated and designed to eliminate areas of concealment.

The Project also would include the installation of limited signage throughout the Project Site, including identity signage and directional/wayfinding signs. Other signage would include traffic and parking signs such as stop signs, speed limit signs, EV parking signs, and ADA accessible parking signs.

Other Project security features include security cameras throughout the Project Site, and blue light emergency stations that would be monitored by Getty Center Security Control Room. The surface parking areas also would be patrolled regularly by Getty Center security staff. The Getty's front gate

on Sepulveda Boulevard would continue to restrict access to the Getty Center when the facility is closed, which includes access to the Project Site.

### 3.3.5 Landscaping and Sustainability Features

As shown in Figure 7 on page 19 and Figure 8 on page 20, landscaping provided as part of the Project would include a variety of plantings and trees along the perimeters of the surface parking areas and in the center of the surface parking areas. The proposed landscaping would improve existing conditions, which consist of graded areas and no landscaping, and would include a broad palette of native and drought-tolerant plantings, such as several species of oak trees with very low water use, California pepper trees, and California buckeye trees.

A network of bioswales also would be installed in order to minimize erosion and stormwater runoff, which will effectively filter rainwater before releasing it to the storm drain (or back into the ground). The Project would be landscaped in accordance with Section 12.21.A.6 of the LAMC. Approximately 30 percent of the Project Site (i.e., 39,312 square feet) will be landscaped exceeding the 4 percent required by Section 12.21.A.6. In addition, 69 trees are proposed to be planted, exceeding the 54 trees required pursuant to the City's Landscape Ordinance set forth in LAMC Section 12.40, et seq., which requires one tree for every four parking spaces. Proposed species, including oak and California pepper trees, were selected to develop canopies that would shade surface parking areas and reduce the heat island effect.

The Project will incorporate environmentally sustainable design 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. Sustainable features also will include the use of native/adapted plant species; use of low energy consumption LED lighting within the surface parking areas and in restroom stations; use of low VOC paints and finishes; installation of planters to capture and reuse stormwater; and use of low water use plumbing fixtures. In addition, the Project would develop 30 percent of the Project's parking spaces as EV ready with at least 10 percent of the parking spaces installed with EV-charging stations. Specifically, the Project would include 24 EV-charging stations for vehicles and two electric shuttle or bus charging stations.

The Project would enclose portions of the north and west sides of the Project Site with a black vinyl-covered chain link fence 6 feet in height. In addition, the Project would install a steel bar picket fence 3 feet 6 inches in height around an existing drainage channel. Along the eastern property line at the Caltrans I-405 freeway right-of-way, the existing 50-inch or taller concrete freeway barrier and wall topped with a 46-inch black security fence (8 feet in total) will remain without modification.

### 3.3.6 Anticipated Construction Schedule

Project construction is anticipated to span six months and be completed by the end of 2022. While the Project Site was substantially graded by Caltrans in connection with the I-405 Freeway Sepulveda Pass Widening Project, it is anticipated that some minimal additional grading would be required as part of the Project. No deep excavation would occur with the deepest grading at between 5 and 5.5 feet occurring only on approximately 0.025 percent of the Project Site with the vast majority of the

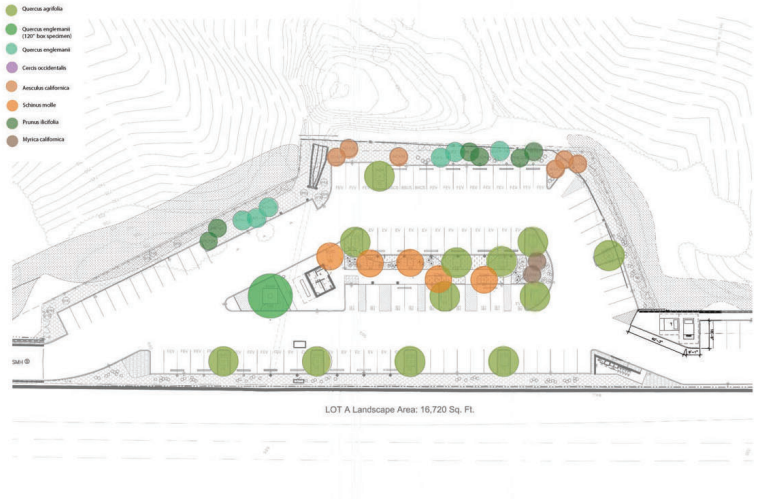



**Figure 7**

Landscape Site Plan—Oak Parking Lot A (South)

Source: Frederick Fisher and Partners, 2021.

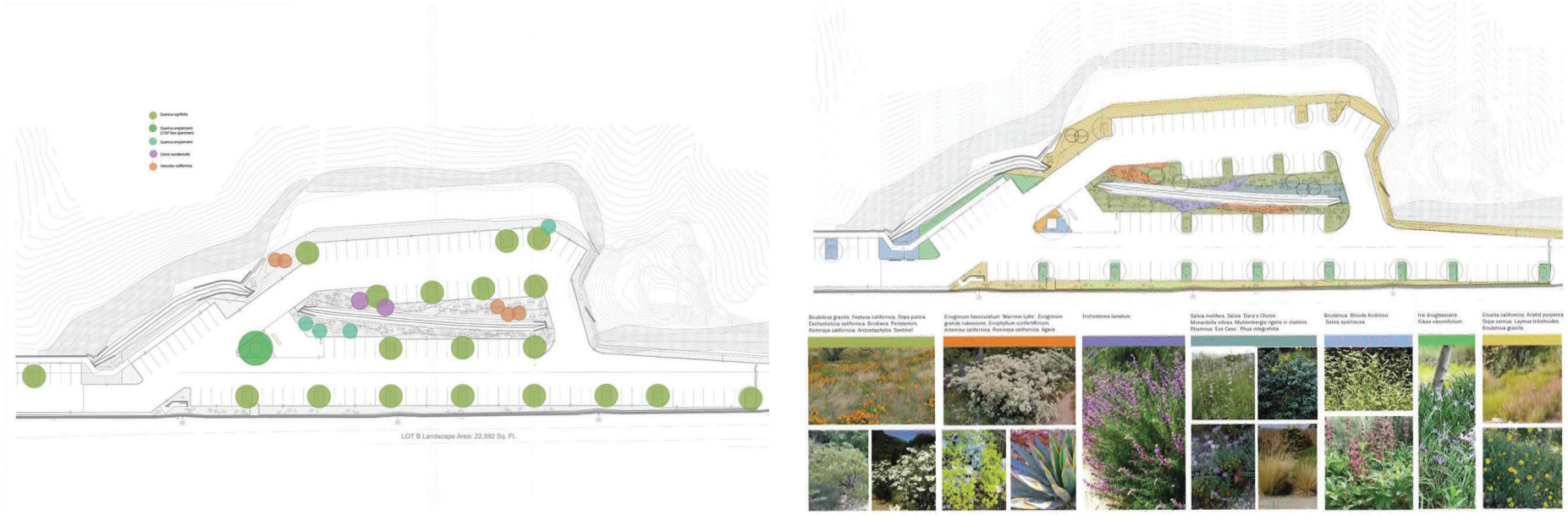


**Figure 8**

Landscape Site Plan— Oak Parking Lot B (North)

Source: Frederick Fisher and Partners, 2021.

Project Site experiencing grading of less than 1 foot. It is estimated that construction would require approximately 3,500 cubic yards of earthwork consisting of approximately 1,400 cubic yards of soil export and 2,100 cubic yards of soil import. It is anticipated that the haul routes to and from the Project Site would be through the Caltrans southbound I-405 freeway shoulder, which would avoid needing to use Sepulveda Boulevard or other City streets for haul truck traffic.

## 3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Initial Study/MND analyzes the impacts associated with the Project and provides 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 Article 4, Section 14.00, a Public Benefit Project 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, building permits, and sign permits.

## 3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The California Department of Transportation has been identified as a responsible agency for the Project. A Trustee Agency under CEQA is a public agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State. The California Department of Fish and Wildlife (CDFW) has been identified as a trustee agency for the Project.

# 4 ENVIRONMENTAL IMPACT ANALYSIS

## I. AESTHETICS

| | 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? | ☐ | ☐ | ☒ | ☐ |
| 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. Would the project have a substantial adverse effect on a scenic vista?**

**Less than Significant 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.

As discussed in Section 3, Project Description, of this Initial Study/MND, the Project Site is located within the Santa Monica Mountains. The Project Site is specifically bounded by the Santa Monica Mountains (open space) to the north, the I-405 to the east, Getty Center Drive to the south, and the Santa Monica Mountains to the west. As shown in Figure 9 on page 23, due to the Project Site's location in the Santa Monica Mountains, panoramic views of the Santa Monica Mountains are available from public rights-of-way in the vicinity of the Project Site, including the I-405 and Sepulveda Boulevard. As such, for purposes of this analysis, scenic vistas in the vicinity of the Project Site include the Santa Monica Mountains.

As described in Section 3, Project Description, of this Initial Study/MND, the Project would create new landscaped surface parking areas on two existing, graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. The Project Site is

**Figure 9**
Site Photos

Source: Ge+y, 2019.

currently vacant, except for stormwater infrastructure that provides drainage for the Project Site and adjacent hillside and the existing graded pads developed for the I-405 Freeway Sepulveda Pass Widening Project. In addition, as shown in Figure 8 on page 23, the Project Site is separated from the I-405 Freeway by 50-inch-high concrete barriers topped with a mesh security fence, for a total barrier height of 8 feet. No change to this existing barrier and fence would occur as part of the Project.

The Project would provide a combined total of approximately 217 automobile parking spaces within the Project Site. The Project also includes a one-story (12 feet in height) approximately 250-square-foot restroom station along with water conveyance infrastructure, fire hydrants, and lighting. A parking ticket machine and emergency phone also would be provided within each of the two parking areas. Approximately 39,312 square feet of landscaped area is also proposed within the Project Site. In addition, the Project would introduce new lighting within the Project Site for safety, security and visibility, including along the perimeter of the Project Site and in the center of the surface parking areas. In particular, the Project proposes the installation of approximately 78 light poles throughout the Project Site. The proposed light poles would be typical of light poles used in surface parking areas and would be 10 feet in height.

Upon buildout of the Project, the existing graded areas would include surface parking areas, a restroom station, landscaping, and ancillary surface parking area lighting. Due to the use of the Project Site as surface parking lots, the majority of the Project Site would remain and would appear as a flat site with panoramic views of the adjacent Santa Monica Mountains continuing to be available from the I-405 and Sepulveda Boulevard. In addition, the extensive landscaping to be provided as part of the Project would serve as an extension of the adjacent Santa Monica Mountains. Furthermore, the proposed 10-foot light poles would only be 2 feet higher than the existing 8-foot concrete barrier and security fence separating the Project Site from the I-405 Freeway. The restroom station would also be designed and located internal to the Project Site to minimize its visibility. As such, the Project would not introduce large buildings or other structures that would increase massing and height throughout the Project Site such that the current panoramic views of the Santa Monica Mountains would no longer be available. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista. Thus, impacts on a scenic vista would be less than significant, and no mitigation measures are required.

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

**No Impact.** The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27 (SR-27), which travels through a portion of Topanga State Park. The Project Site is not located along a state scenic highway. The Project Site is approximately 19.1 miles east of SR-27.[3] Because the Project Site is separated from the nearest state scenic highway by 19.1 miles, the Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized natural feature within a state scenic highway. Therefore, no impacts to scenic resources within a scenic highway would occur, and no mitigation measures are required.

[3] Caltrans, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed June 9, 2021.

**c. In non-urbanized areas, would the project 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?**

**Less Than Significant Impact.** The Project Site is located in an urbanized area.[4] As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, as discussed in Section 3, Project Description, of this Initial Study/MND, the Project Site is zoned by the Los Angeles Municipal Code (LAMC) as PF-1XL and RE40-1-H. Land uses permitted or conditionally permitted in the PF zone include museums as a Public Benefit. Land uses permitted or conditionally permitted in the RE zone include museums as a Public Benefit. Height Zone 1 in the RE zone with a Hillside designation allows structures with a height between 30 feet and 36 feet and Height Zone 1XL in the PF zone allows structures with a height of 30 feet. As previously described, the Project would create new landscaped surface parking areas on two existing, graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. The proposed parking areas would be primarily used by Getty Center vendors and staff to help maintain available parking in the Getty's main parking structure for visitors on peak days. As the Project would be an accessory use of the existing museum, the proposed surface parking areas would be consistent with the museum uses permitted in the PF and RE zones. In addition, as discussed above, the proposed light poles would be 10 feet in height and the proposed restroom station would be 12 feet in height. As such, the proposed height of the light poles and the restroom station would not exceed the permitted height of 30 feet for structures within the PF zone or 30 feet to 36 feet for structures in the RE zone.

With regard to the City's regulations governing scenic quality, a number of local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element, the Brentwood–Pacific Palisades Community Plan, and the Citywide Urban Design Guidelines. These plans are briefly described below. The Project's consistency with applicable goals, objectives, and policies from these plans is also provided below.

### Citywide General Plan Framework

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. The following objectives and policy from the Citywide General Plan Framework Urban Form and Neighborhood Design Chapter govern scenic quality and are applicable to the Project:

[4] Pursuant to Public Resources Code Section 21071, an "urbanized area" can be defined as an incorporated city that has a population of at least 100,000 persons. The Project Site is located within the City of Los Angeles, which is an incorporated city with a population well over 100,000 persons.

- **Objective 5.5:** Enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

- **Objective 5.9:** Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

- **Policy 5.9.1:** Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.

The Project would not conflict with these applicable objectives and policy as the Project would upgrade the quality of development and improve the quality of the public realm by improving the existing aesthetic quality of the two graded areas and would include design elements to enhance personal safety. Specifically, the Project would upgrade the existing aesthetic quality by improving two existing vacant graded areas that were previously used by Caltrans for construction-related activities with newly paved landscaped surface parking areas. The Project would also include a setback from the I-405 Freeway right-of-way varying from approximately 2 feet to 9 feet that would be landscaped with a broad palette of native and drought-tolerant plantings and would be equipped with an automatic irrigation system. The undeveloped hillside areas with existing native vegetation to the west of the Project Site would not be altered. A limited amount of new native and drought-tolerant plantings would also be installed immediately adjacent to some portions of the western edge of the Project Site. Approximately 30 percent (i.e., 39,312 square feet) of the approximately 133,097-square-foot Project Site would be landscaped exceeding the 4 percent required by Section 12.21.A.6 of the LAMC. Additionally, 69 trees are proposed to be planted, exceeding the 54 trees required based upon one tree for every four parking spaces. The Project would also introduce new lighting within the Project Site for safety, security and visibility, including along the perimeter of the Project Site and in the center of the surface parking areas. In particular, the Project proposes the installation of approximately 78 light poles throughout the Project Site. The proposed light poles would be typical of light poles used in surface parking areas and would be 10 feet in height, only 2 feet higher than the barrier separating the I-405 Freeway from the Project Site. Other Project security features include security cameras throughout the Project Site, and blue light emergency stations that would be monitored by Getty Center Security Control Room. The Getty's front gate on Sepulveda Boulevard would continue to restrict access to the Getty Center when the facility is closed, which includes access to the Project Site.

Based on the above, the Project would not conflict with the applicable objective and policies of the Citywide General Plan Framework governing scenic quality.

### Brentwood–Pacific Palisades Community Plan

The Brentwood–Pacific Palisades Community Plan is intended to promote an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the community. The Community Plan is also intended to guide development in order to create a healthful and pleasant environment. Goals, objectives, policies and programs are created to meet the existing and future needs and desires of the community. In addition, the Community Plan contains an Urban Design

Chapter that includes policies to establish the minimum level of design that shall be observed in multiple residential and commercial projects within the Community Plan area. The policies in the Urban Design Chapter also address design issues for parking and landscaping. As set forth in the Urban Design Chapter, the goal of the design policies and standards presented therein are to ensure that residential and commercial projects and public spaces and rights-of-way incorporate specific elements of good design in order to promote a stable and pleasant environment. The following objective and policies provided in the Brentwood–Pacific Palisades Community Plan related to scenic quality and are applicable to the Project:

- **Policy 1-3.2:** Preserve existing views in hillside areas.
- **Objective 1-6:** To limit the intensity and density in hillside areas to that which can reasonably be accommodated by infrastructure and natural topography.
- **Policy 1-6.6:** The scenic value of natural land forms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and man-made features such as tree masses, rock outcrops and existing structures.
- **Surface Parking Landscaping 5:** Devoting 7% of total surface area of surface parking lots to landscaping.
- **Surface Parking Landscaping 6:** Providing a landscaped buffer along public streets or adjoining residential uses.
- **Light and Glare 1:** Installing on-site lighting along all pedestrian walkways and vehicular access ways.
- **Light and Glare 2:** Shielding and directing of on-site lighting onto driveways and walkways, directed away from adjacent residential uses.

As discussed above in Checklist Question I.a, the Project Site is specifically bounded by the Santa Monica Mountains (open space) to the north, the I-405 to the east, Getty Center Drive to the south, and the Santa Monica Mountains to the west. Due to the Project Site's location in the Santa Monica Mountains, panoramic views of the Santa Monica Mountains from public rights-of-way are available in the vicinity of the Project Site. As described in Section 3, Project Description, of this Initial Study/MND, the Project would create new landscaped surface parking areas on two existing, graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. With regard to preserving existing views in hillside areas, within each of the surface parking areas, light poles with a maximum height of 10 feet would be provided. In addition, a restroom station with a height of 12 feet is also proposed. The light poles would be only 2 feet higher than the concrete barrier and mesh fencing separating the I-405 Freeway from the Project Site. Furthermore, the proposed restroom station would be located internal to the Project Site to minimize its visibility from surrounding public right-of-ways. Due to the use of the Project Site as surface parking lots, the majority of the Project Site would remain and would appear as a flat site with panoramic views of the adjacent Santa Monica Mountains continuing to be available from the I-405 and Sepulveda Boulevard. Therefore, the Project would not introduce large buildings or other structures that would increase massing and height throughout the Project Site such that existing views

of the Santa Monica Mountains would be obstructed. Similarly, the Project would limit the intensity in the hillside area to that which can be accommodated by the existing infrastructure and natural topography. Specifically, the Project would be located adjacent to the I-405 Freeway within two naturally occurring carve-outs at the base of the hillside that are adequately sized to accommodate the proposed surface parking areas. The Project would be implemented within the existing Project Site boundaries, which were previously disturbed and graded as part of the I-405 Freeway Sepulveda Pass Widening Project, and would not require grading within the adjacent Santa Monica Mountains. In addition, the Project would connect to the existing infrastructure and would not require upgrades to the main infrastructure to serve the Project. Additionally, the Project would create a landscape buffer with a setback from the I-405 Freeway right-of-way varying from approximately 2 feet to 9 feet that would be landscaped with a broad palette of native and drought-tolerant plantings and would be equipped with an automatic irrigation system. The undeveloped hillside areas with existing native vegetation to the west of the Project Site would not be altered.

As previously noted above, approximately 30 percent (i.e., 39,312 square feet) of the approximately 133,097-square-foot Project Site would be landscaped exceeding the 7 percent provided for in the Brentwood–Pacific Palisades Community Plan. The Project would introduce new lighting within the Project Site for safety, security and visibility, including along the perimeter of the Project Site and in the center of the surface parking areas. The proposed light poles would be typical of light poles used in surface parking areas and would incorporate shielding and would direct light onto the surface parking areas.

Based on the above, the Project would not conflict with the applicable objective and policies of the Brentwood–Pacific Palisades Community Plan governing scenic quality.

### Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered when evaluating a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

#### Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all

Pedestrian access to and from the Project Site would not be available. Specifically, once visitors have parked their vehicles in Oak Parking Lot A (South) or Oak Parking Lot B (North), a Getty-operated shuttle would transport those visitors either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). Shuttle service also would be provided to return visitors to their cars in the new parking areas. The Project would be designed to promote a safe, comfortable, and accessible pedestrian experience with landscaping and amenities. Specifically, the Project would be landscaped with a broad palette of native and drought-tolerant plantings. In addition, Oak Parking Lot A (South) would include a restroom, bench, water fountain, and trash receptacles in the area where the shuttle will pick up passengers. The area would be shaded with a cantilevered canopy extending out from the restroom structure and a large oak tree. Similarly, the Oak Parking Lot B (North) would include a bench, water fountain, and trash receptacles and a large oak tree for shade in the area where the shuttle will pick up passengers.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience

As previously discussed, the Project Site is intended for vehicular access only; therefore, pedestrian access to and from the Project Site would not be available. Specifically, once visitors have parked their vehicles, a Getty-operated shuttle would transport those visitors either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). Shuttle service also would be provided to return visitors to their cars in the new parking areas. The Project would be designed to promote a safe, comfortable and accessible pedestrian experience with landscaping and amenities. Therefore, the pedestrian experience would not be degraded with implementation of the Project.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale

The Project would include a setback from the I-405 Freeway right-of-way varying from approximately 2 feet to 9 feet that would be landscaped with a broad palette of native and drought-tolerant plantings, thereby minimizing the appearance of the proposed surface parking. In addition, the existing 8-foot concrete barrier with mesh fencing separating the Project Site from the I-405 Freeway would remain. Within the Project Site, the Project would maintain a human scale through the inclusion of landscaping, a restroom (in Oak Parking Lot A), benches, water fountains and trash receptacles.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The undeveloped hillside areas with existing native vegetation to the west of the Project Site would be maintained as part of the Project. Upon buildout of the Project, the Project Site would remain and would appear as a mostly flat lot with ancillary surface parking improvements. In addition, the design of the Project and landscaping would consider its proximity to the Santa Monica Mountains and would use neutral colors and native vegetation to integrate the Project into its surroundings.

Guideline 5: Express a clear and coherent architectural idea

The Project would include design elements to integrate the proposed surface parking areas with the existing Getty Center and would employ appropriate architectural features to ensure compatibility with the surrounding hillsides.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

As discussed above, pedestrian access to and from the Project Site would not be available. Specifically, once visitors have parked their vehicles, a Getty-operated shuttle would transport those visitors either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). Shuttle service also would be provided to return visitors to their cars in the new parking areas. The Project would be designed to enhance the parking area and pedestrian environment with landscaping and amenities. Specifically, the Project would be landscaped with a broad palette of native and drought-tolerant plantings. In addition, Oak Parking Lot A (South) would include a restroom, bench, water fountain, and trash receptacles in the area where the shuttle will pick up passengers. The area would be shaded with a cantilevered canopy extending out from the

restroom structure and a large oak tree. Similarly, the Oak Parking Lot B (North) would include a bench, water fountain, and trash receptacles and a large oak tree for shade in the area where the shuttle will pick up passengers.

Guideline 7: Carefully arrange design elements and uses to protect site users

The Project would introduce new lighting within the Project Site for safety, security and visibility, including along the perimeter of the Project Site, in the center of the surface parking areas, and near the restroom station. Entry into the restroom station would be well illuminated and designed to eliminate areas of concealment. Additional Project security features include security cameras throughout the Project Site, and blue light emergency stations that would be monitored by Getty Center Security Control Room. The surface parking areas also would be patrolled regularly by Getty Center security staff. The Getty's front gate on Sepulveda Boulevard would continue to restrict access to the Getty Center when the facility is closed, which includes access to the Project Site. The Project would also provide increased access in the Sepulveda Pass area for LAFD and other emergency responders. As part of the I-405 Freeway Sepulveda Pass Widening Project, Caltrans widened the access road to the Project Site to 24 feet so that it can accommodate fire trucks. The Project involves extending water conveyance infrastructure under this access road into the Project Site, where fire hydrants will be installed to enable LAFD to use the parking lot areas to help protect the surrounding communities from fire danger. The Getty also will make the new parking areas available to LAFD and other emergency responders as a staging area in the event of an emergency, like other areas on the Getty Center property. In addition, the Getty will install drought tolerant landscaping and irrigation on the Project Site, which will help reduce the risk of fire in and around the parking areas.

Guideline 8: Protect the site's natural resources and features

The proposed landscaping would improve the site's existing conditions and would include a broad palette of native and drought-tolerant plantings, such as several species of oak trees with very low water use, California pepper trees, and California buckeye trees. In addition, the undeveloped hillside areas with existing native vegetation to the west of the Project Site would be maintained as part of the Project.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users

As discussed above, the Project will incorporate environmentally sustainable design features and construction protocols required by the Los Angeles Green Building Code and CALGreen. The Project's design is based on principle of environmental sustainability. Sustainable features will include the use of native/adapted plant species; use of low energy consumption LED lighting within the surface parking areas and in the restroom station; use of low VOC paints and finishes; installation of planters to capture and reuse stormwater; and use of low water use plumbing fixtures. In addition, the Project would develop 30 percent of the Project's parking spaces as EV ready with at least 10 percent of the parking spaces installed with EV-charging stations. Specifically, the Project would include 24 EV-charging stations for vehicles and two electric shuttle or bus charging stations.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat

The Project would include the installation of several catch basins that capture the stormwater runoff. In addition, to promote habitat, the Project's proposed landscaping would include a broad palette of native and drought-tolerant plantings, such as several species of oak trees, California pepper trees, and California buckeye trees. The undeveloped hillside areas with existing native vegetation to the west of the Project Site would be maintained as part of the Project.

In summary, for all the foregoing reasons, the Project would not conflict with the objectives of the City's Commercial Citywide Design Guidelines governing scenic quality.

***Conclusion***

Based on the above, the Project would not conflict with zoning and other regulations governing scenic quality. Impacts would be less than significant, and no mitigation measures are required.

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

**Less than Significant Impact.** New light sources introduced by the Project would incrementally increase nighttime illumination levels; and building materials, onsite lighting, and certain onsite uses could create glare. The Project Site currently generates no to very minimal levels of light and glare from occasional vehicle headlights in the vacant lots. Glare sources in the vicinity of the Project Site include glass and metal vehicle and building surfaces. As previously discussed, the Project Site is bounded by the Santa Monica Mountains (open space) to the north, the I-405 to the east, Getty Center Drive to the south, and the Santa Monica Mountains to the west. There are no residential or other sensitive uses adjacent to the Project Site which could be affected by an increase in light levels on the Project Site. Specifically, the nearest residential uses are located within the communities of Bel Air and Brentwood and are separated from the Project Site by hillsides and/or the I-405 Freeway. However, new light and glare sources within the Project Site could potentially interfere with motorists traveling along the I-405 Freeway, as discussed further below.

**Construction**

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter months when the duration of daylight may not be sufficient. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent any evening construction occurs and there is a need for artificial lighting, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements and would be focused on the particular area undergoing work. Additionally, as part of the Project, construction lighting would be shielded and directed downward on the Project Site such that the light source would not be seen from the public right-of-way, or from above. In addition, there are no residential uses within the immediate vicinity of the Project Site. The nearest residential uses are located within the communities of Bel Air and Brentwood and are separated from the Project Site by

hillsides and/or the I-405 Freeway and thus, would not be significantly impacted by any of the limited construction lighting that would be used within the Project Site. The existing 8-foot-high concrete barrier and mesh fencing separating the I-405 Freeway and the Project Site would remain and would further obstruct direct views of the Project Site. Accordingly, uses in the vicinity of the Project construction site would not be anticipated to be substantially affected by construction lighting.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight 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. With regard to the potential for nighttime glare, as discussed above, construction lighting would be focused on the particular area undergoing work and would be shielded to minimize light spillover. Also, as previously noted, the existing concrete barrier separating the I-405 Freeway and the Project Site would obstruct views of the Project Site from the I-405 Freeway. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary Project-related construction activities would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.

**Operation**

Nighttime lighting in the vicinity of the Project Site includes streetlights, automobile lights, signage, residential and commercial building lights, and parking facilities. Existing lighting within the Project Site is non-existent to very minimal from occasional vehicle headlights in the vacant lots. Glare sources in the vicinity of the Project Site include glass and metal vehicle and building surfaces. There are no glare sources on the Project Site except for the occasional vehicle.

As discussed above, the Project would create two new landscaped surface parking areas on two existing, graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. The surface parking areas are proposed to be open seven days a week, from 5:00 A.M. until 11:00 P.M. As described in Section 3, Project Description, of this Initial Study/MND, the Project would introduce new lighting within the Project Site for safety, security and visibility, including along the perimeter of the Project Site and in the center of the surface parking areas. Specifically, the Project proposes the installation of approximately 78 light poles throughout the Project Site. The proposed light poles would be typical of light poles used in surface parking areas and would use 29-watt energy-efficient LED lighting, directed down to the ground and box-shielded. The light poles would be 10 feet in height. The entryway to the restroom station would also be well illuminated and designed to eliminate areas of concealment.

The proposed lighting sources would be similar to other lighting sources already in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area. Outdoor lighting would be shielded and directed toward areas to be lit within the Project Site and away from adjacent properties. As discussed above, the nearest residential uses are located within the communities of Bel Air and Brentwood and are separated from the Project Site by hillsides and/or the I-405 Freeway and thus, would not be significantly impacted by the limited outdoor lighting

within the Project Site that would be directed downward. Project lighting would also comply with regulatory requirements, including the requirements that are set forth by CALGreen and Title 24 that stipulate the use of high-performance light with appropriate light and glare control according to Backlight, Uplight, and Glare standards. In addition, headlights from vehicles entering and exiting the surface parking areas would not be highly visible for long periods of time as vehicles would be circulating the surface parking areas as they enter, exit, and search for a parking space. In addition, the existing 8-foot concrete barrier and mesh fencing would partially block views of the Project Site and associated lighting. Headlights from vehicles are also typical for the area and would not be a new source of light.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. Nighttime glare can result from light poles and vehicle headlights. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project Site would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. As discussed above, the Project would include light poles with a height of 10 feet. The proposed light poles would be shielded and directed toward the surface parking areas and would not include reflective surfaces. As such, the light poles would not generate daytime or nighttime glare that would be directed towards drivers in the vicinity of the Project Site. Similarly, the proposed restroom structure would use a neutral color palette and would not include shiny, reflective surfaces. In addition, headlights from vehicles entering and exiting the surface parking areas would not be highly visible for long periods of time as vehicles would be circulating the surface parking areas as they enter, exit, and search for a parking space. As previously discussed, the existing 8-foot concrete barrier and mesh fencing would partially block views of the Project Site and associated lighting and potential glare. Headlights from vehicles are also typical for the area and would not be a new source of glare.

Based on the above, Project operation would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.

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

**No Impact.** As described in Section 3, Project Description, of this Initial Study/MND, the Project Site currently consists of two vacant graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. The Project Site was previously graded and used by Caltrans for construction-related activities in connection with the I-405 Freeway Sepulveda Pass Widening Project. The Project Site is currently vacant, except for storm water infrastructure that provides drainage for the site and adjacent hillside. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are 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.[5] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required.

[5] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021.

**b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** The Project Site is zoned as PF-1XL (Public Facilities, Height Zone 1XL) and RE40-1-H (Residential Estate with a minimum lot area of 40,000 square feet, Height Zone 1, Hillside). The Project Site is not zoned for agricultural use. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.[6] 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.

**c. Would the project 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 includes two vacant graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. The Project Site was previously graded and used by Caltrans for construction-related activities in connection with the I-405 Freeway Sepulveda Pass Widening Project. The Project Site is currently vacant, except for storm water infrastructure that provides drainage for the site and adjacent hillside. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned as PF-1XL (Public Facilities, Height Zone 1XL) and RE40-1-H (Residential Estate with a minimum lot area of 40,000 square feet, Height Zone 1, Hillside) and is not zoned and/or used as forest land.[7] 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.

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

**No Impact.** As discussed above, the Project Site does not include any forest land or timberland. 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.

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

**No Impact.** The Project Site is located in an urbanized area and does not include farmland or forest land. As previously discussed, the Project Site includes two vacant graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. The Project Site was previously graded and used by Caltrans for construction-related activities in connection with the I-405 Freeway Sepulveda Pass Widening Project. The Project would be limited to

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6 California Department of Conservation, The Williamson Act Status Report 2016–17, August 2019.

7 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021.

the boundaries of the Project Site and would not include construction activities or result in changes in uses in the surrounding area, which is comprised of steep undeveloped hillsides to the north and west, existing Getty Center uses to the south, and the I-405 to the east. 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.

# 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. Would the project conflict with or obstruct implementation of the applicable air quality plan?**

**Less Than Significant Impact.** The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD is the air pollution control agency for the South Coast Air Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [$O_3$], particulate matter [$PM_{10}$], and fine particular matter [$PM_{2.5}$]). SCAQMD's 2016 Air Quality Management Plans (2016 AQMP) is the regional blueprint for achieving air quality standards and healthful air. The 2016 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.[8] 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 in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP. The 2020–2045 RTP/SCS was approved in September 2020. Consistency with the 2020–2045 RTP/SCS is therefore analyzed in Land Use, Greenhouse Gas Emissions and Energy sections of this Initial Study/MND. However, the 2016 AQMP relies on the 2016–2040 RTP/SCS and is therefore addressed for consistency with the 2016 AQMP.

The 2016 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG's 2016–2040 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As previously described, the Project would replace two existing graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center with two new surface parking areas and ancillary improvements. The Project would not include any residential or commercial uses, which would directly or indirectly increase the population within and in the vicinity of the Project Site. In addition, as discussed in Response to Checklist Question XIV.a, below, it is expected that the Getty Center would use current staff to manage operations of the two new surface parking areas, as needed. Furthermore, while the Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout, these would be short-term opportunities and are employment positions that circulate throughout the region based on the construction site. As such, the Project would not result in additional permanent employment. Therefore, the Project would be consistent with the demographic projections set forth in SCAG's 2016–2040 RTP/SCS and which were used in the 2016 AQMP because the Project would result in no increase in population or permanent employment. Thus, the Project would not conflict with or obstruct implementation of the 2016 AQMP.

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and

[8] SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.

- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.

- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.

- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

As described in Section 3, Project Description, of this Initial Study/MND, the Project would replace two existing graded areas previously used for construction staging for the I-405 Freeway Sepulveda Pass Widening Project with new landscaped surface parking areas and ancillary improvements. The City of Los Angeles Department of Transportation (LADOT's) 2019 Guidelines do not consider parking spaces to be a use that generates vehicle trips. In addition, the only building associated with the Project would be a small restroom for drivers and passengers that would be intermittently used and also would be an ancillary use to the existing Getty Center. Use of the restroom would require access to the parking areas, and therefore it also would not generate independent vehicle trips. Thus, neither the Project's parking areas nor its restroom would directly generate vehicle trips. Rather, trip generation at the Getty Center would continue to be associated with admission tickets and programming at the Getty Center itself and ticketing and programming would not be affected by the Project. As such, mobile source emissions associated with the proposed parking and restroom uses would be minimal. The Project would therefore support the City's objective and policy to reduce particulate air pollutants from unpaved parking areas. The Project is designed to supplement the Getty's ongoing efforts to improve traffic flow in and out of the Getty Center and alleviate congestion on Sepulveda Boulevard. Specifically, the Getty has already: (1) implemented a robust transportation demand management program that includes telecommuting and providing incentives for staff to use alternative modes of transportation including carpools, vanpools, public transit, and bicycling; (2) developed alternative work schedules for staff, including alternating "Off Fridays" for staff to increase the parking available on Fridays for visitors; (3) replaced kiosks that were previously used to collect parking fees at the main parking structure with an automated parking system that is internal to the structure (similar to what is found at malls and airports), which reduced vehicle queuing entering the structure and allowed an additional access lane to the structure to be developed; (4) created an additional vehicular access point into the main parking structure for the second access lane to enter, thereby reducing queuing; (5) added electronic parking space counters to inform visitors on each level of the main parking structure how many spaces are available; and (6) designated a turn-around location for shuttles, taxis, rideshare vehicles to drop off staff and visitors.

The Project would build upon these existing efforts by providing additional parking capacity at the Getty Center. The proposed surface parking areas would be primarily used by Getty Center vendors and staff to help maintain available parking in the Getty's main parking structure for visitors on peak days (which primarily occur over the winter holidays and summer break). Accordingly, this additional capacity would help reduce queuing (and air emissions) on Sepulveda Boulevard by enabling vehicles to get into the Getty Center campus faster and disbursed into either the main parking structure or the proposed surface parking areas. In addition, the new surface parking areas would be available to provide onsite parking for up to nine additional buses, in addition to the 14 buses that can already be accommodated onsite. Additional bus parking helps to ensure that buses would not leave the Getty Center property after dropping off their passengers, which will prevent buses from traveling back out onto Sepulveda or into residential neighborhoods and would reduce multiple trips and associated emissions.

The Project would develop 30 percent of the Project's parking spaces as electric vehicle (EV) ready with at least 10 percent of the parking spaces installed with EV-charging stations. As part of the installed EV-charging stations, the Project would include 24 EV-charging stations for vehicles and two electric shuttle or bus charging stations. The installation of EV ready and EV-charging stations would encourage use of alternative fuel vehicles traveling to and from the Project Site, thereby reducing mobile source criteria pollutant emissions from fossil fuel combustion.

As shown in Table 1 and Table 2 on pages 40 and 41, respectively, in the analysis below, Project implementation would not exceed California or National ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$), the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP. Therefore, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP. Impacts would be less than significant, and no mitigation measures are required.

**b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

**Less Than Significant Impact.** As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD CEQA Air Quality Handbook.[9]

[9] SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/ceqa/hdbk.html, accessed June 9, 2021.

**Table 1**
**Regional and Localized Unmitigated Construction Emissions[a]**
**(pounds per day)**

| | VOC[b] | $NO_X$ | CO | $SO_X$ | $PM_{10}$[c] | $PM_{2.5}$[c] |
|---|---|---|---|---|---|---|
| **Regional Emissions** | | | | | | |
| 2022 | 3 | 22 | 17 | <1 | 4 | 2 |
| Maximum Regional Emissions | 3 | 22 | 17 | <1 | 4 | 2 |
| Regional Construction Daily Significance Threshold | **75** | **100** | **550** | **150** | **150** | **55** |
| **Over/(Under)** | **(72)** | **(78)** | **(533)** | **(150)** | **(146)** | **(53)** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Localized Emissions** | | | | | | |
| 2022 | 3 | 20 | 16 | <1 | 3 | 2 |
| Maximum Localized Emissions | 3 | 20 | 16 | <1 | 3 | 2 |
| Localized Significance Threshold[d] | — | 137 | 2,367 | | 57 | 18 |
| **Over/(Under) Threshold** | — | **(118)** | **(2,351)** | | **(54)** | **(16)** |
| **Exceed Threshold?** | **—** | **No** | **No** | **—** | **No** | **No** |

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix IS-1 of this Initial Study/MND.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEmod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *$PM_{10}$ and $PM_{2.5}$ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 2 (Northwest Coastal LA County)Central LA) for a 1-acre site with a 200-meter receptor distance.*

*Source: Eyestone Environmental, 2022.*

## Construction

Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from site preparation, grading and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides ($NO_X$), would result from the use of construction equipment such as loaders, graders, backhoes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Construction activities would include site preparation, grading, paving, building construction, and architectural coatings. Construction would occur over approximately six months, with completion anticipated by end of 2022. Construction would require approximately 3,500 cubic yards of earthwork

**Table 2**
**Project-Related Operational Emissions[a]**
**(pounds per day)**

| Emission Source | VOC[b] | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| **Operational Emissions** | | | | | | |
| Area | <1 | <1 | <1 | <1 | <1 | <1 |
| Energy (Natural Gas) | 0 | 0 | 0 | 0 | 0 | 0 |
| Mobile | 0 | 0 | 0 | 0 | 0 | 0 |
| Stationary (Emergency Generator) | 0 | 0 | 0 | 0 | 0 | 0 |
| Project Regional Emissions | <1 | <1 | <1 | <1 | <1 | <1 |
| Regional Significance Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Over/(Under)** | **(55)** | **(55)** | **(550)** | **(150)** | **(150)** | **(55)** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Project Localized Emissions | <1 | <1 | <1 | <1 | <1 | <1 |
| Localized Significance Threshold | — | 137 | 2,367 | — | 14 | 5 |
| **Over/(Under)** | **—** | **(137)** | **(2,367)** | | **(14)** | **(5)** |
| **Exceed Threshold?** | **—** | **No** | **No** | **—** | **No** | **No** |

[a] *Worksheets and modeling output files are provided in Appendix IS-1 of this Initial Study/MND.*

[b] *CalEEMod calculates VOC from architectural coatings and ROG from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEmod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

*Source: Eyestone Environmental, 2022.*

consisting of approximately 1,400 cubic yards of soil export and approximately 2,100 cubic yards of soil import.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for $NO_X$; (3) 550 pounds per day for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides ($SO_X$); (5) 150 pounds per day for $PM_{10}$; and (6) 55 pounds per day for $PM_{2.5}$.[10]

***Regional Impacts***

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod)

[10] SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed June 9, 2021.

Version 2016.3.2. Model results are provided in Appendix IS-1, of this Initial Study/MND. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of unmitigated maximum daily regional emissions for Project construction is presented in Table 1 on page 40, along with the regional significance thresholds for each air pollutant.

As shown in Table 1, maximum unmitigated regional construction emissions would not exceed the SCAQMD regional significance thresholds for VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, or $PM_{2.5}$. Thus, potential impacts associated with regional construction emission would be less than significant, and no mitigation measures are required.

***Localized Impacts***

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate.[11] SCAQMD provides LSTs applicable to the following criteria pollutants: $NO_X$, CO, $PM_{10}$, or $PM_{2.5}$. SCAQMD does not provide an LST for $SO_2$ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in $O_3$ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. As the Project is smaller than five acres, LST look-up values were used to assess localized impacts.

Conservative estimates of maximum construction-related localized (on-site) daily emissions for $NO_X$, CO, $PM_{10}$, or $PM_{2.5}$ are presented in Table 1. Based on the construction site acreage and distance to the closest off-site sensitive receptor, localized construction emissions thresholds were obtained from the LST look-up tables and are also listed in Table 1. With respect to air quality, the nearest sensitive receptor to Project construction activities is an institutional land use with a school (Leo Baeck Temple) located approximately 250 meters (820 feet) southeast of the Project Site, across the I-405 Freeway. Residential uses are also located east of the I-405 Freeway approximately 1,000 feet from the Project site. As a conservative assumption, a 200-meter (656 feet) receptor distance was used to evaluate impacts at these receptors.[12] As presented in Table 1, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for $NO_X$, CO, $PM_{10}$, or $PM_{2.5}$.

[11] SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009.

[12] SCAQMD LST thresholds are given at 25, 50, 100, 200 and 500-meter increments.

Therefore, localized construction emissions resulting from the Project would result in less than significant short-term impacts, and no mitigation measures are required.

### Operation

SCAQMD has established separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include square footage to determine energy usage from parking lot lighting and the restroom. The Project would not generate trips or result in a net increase in daily vehicle trips to the Project Site upon completion (as discussed in Response to Checklist Question XVII.a, below). In addition, the proposed land uses would result in an increase in emissions generated by energy sources (e.g., electricity use) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings). As discussed previously, the Project would include EV ready parking spaces and EV-charging stations to encourage use of electric vehicles traveling to and from the Project Site, thereby reducing mobile source criteria pollutant emissions from fossil fuel combustion. Although installation of EV-charging stations would reduce mobile source emissions, as a conservative approach, the analysis does not take credit for this reduction.

#### *Regional Impacts*

The results of the modeled emissions calculations are provided in Table 2 on page 41, and CalEEMod model output files are provided in Appendix IS-1, of this Initial Study/MND. As indicated therein, the Project would result in an increase in criteria pollutant emissions which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

#### *Localized Impacts*

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table 2. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to five acres in size, were used to evaluate potential localized impacts. As shown in Table 2, on-site operational emissions would not exceed any of the LSTs.

Within an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations are generally found within close proximity to congested intersection locations. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increase. However, the Project would not generate any new trips or increase congestion at local intersection locations. Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

Based on the above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant, and no mitigation measures are required.

**c. Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Less Than Significant Impact.** Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. As discussed above, the nearest sensitive receptor with respect to air quality is an institutional land use with a school (Leo Baeck Temple) located approximately 250 meters (820 feet) southeast of the Project site, across the I-405 Freeway. Residential uses are located further away approximately 1,000 feet from the Project Site.

As discussed in Response to Checklist Question III.b, above, construction and operation of the Project would result in less than significant impacts relative to both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005). Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. The Project would not include any sources of TACs such as generators, boilers or any other combustion sources. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located in proximity to the Project Site. As such, a HRA was not required for the Project.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and no mitigation measures are required.

**d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Less Than Significant Impact.** No other emissions, including 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.

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 include the development of two surface parking areas and ancillary 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 Project would not result in other emissions affecting a substantial number of people. Impacts would be less than significant, and no mitigation measures are required.

[13] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed June 9, 2021.

[14] SCAQMD, Rule 402, Nuisance, adopted May 7, 1976..

# 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? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |

The following analysis is based on the Biological Resources Assessment prepared for the Project by GPA Consulting, dated August 6, 2020, and included as Appendix IS-2 of this Initial Study/MND.

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

**Less Than Significant With Mitigation Incorporated.** As previously described, the Project Site comprises two graded areas located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. The Project Site is currently unpaved and contains storm

drain infrastructure for the site and the adjacent hillside. In addition, the Project Site was previously graded and used by Caltrans for construction-related activities in connection with the I-405 Freeway Sepulveda Pass Widening Project.

As set forth in the Biological Resources Assessment,[15] the Project Site is not located within a Significant Ecological Area as defined by the City of Los Angeles. There are 37 special-status plant species with potential to occur within the vicinity of the Project Site. A site survey was conducted that included the Project Site and a 300-foot buffer surrounding the site on the north, south and west (the east side of the site is bounded by the I-405 Freeway where no plant species occur). The survey concluded that no suitable habitat for special status plant species or natural vegetation communities exist on the Project Site, but there is suitable habitat for 14 special-status plant species in the buffer area. Dust resulting from construction activities could result in indirect impacts on plants within the buffer area. However, implementation of the mitigation measures included below would ensure that impacts on native vegetation communities and special-status plants would be less than significant.

According to the Biological Resources Assessment, wildlife may use the Project Site and buffer area for local movement and foraging, and the trees in the buffer area could provide suitable bird nesting and bat roosting habitat. Rock crevices in the buffer area also could be used by roosting bats. As set forth in the Biological Resources Assessment, there are 48 special-status wildlife species with potential to be in the vicinity of the Project Site based on recorded observations within the area. Based on habitat requirements and biological survey results, there is no suitable habitat for special-status wildlife species within the Project Site, but there is suitable habitat for six special-status wildlife species in the buffer area. Excavation, grading, and other ground-disturbing activities could result in impacts on common/urban wildlife species, if those species were to be in the Project Site during construction. In addition, construction activities, including removal of ruderal vegetation within the Project Site, could affect foraging and nesting habitat for wildlife species, particularly for birds. However, 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, of 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." 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. Should construction activities occur during the nesting season, nesting bird surveys would be completed no more than 48 hours prior to commencement of construction activities to determine if nesting birds/raptors or active nests are within 300 feet (500 feet for potential raptor nests) of the Project Site. If nesting birds are found, measures to ensure that the birds/raptors and/or their nests are not harmed, would be implemented, including but not limited to, installation and maintenance of appropriate buffers (until nesting activity has ended. Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not have a substantial adverse effect

[15] It should be noted that the biological survey was conducted prior to the Getty Fire, which appears to have burned areas surrounding the Project Site between October 28 and November 5, 2019. The results of the Biological Resources Assessment are based on pre-fire conditions. Nevertheless, to be conservative, the proposed mitigation measures would still apply.

on nesting birds. Furthermore, as discussed in the Biological Resources Assessment, the Project Site provides only marginal habitat, the area of impact would be minimal, and there are better foraging and nesting opportunities in the buffer area and in other open space areas adjacent to the buffer area.

Other potential impacts to wildlife in the area may include noise, dust, and vibration from construction activities, which could result in indirect impacts on nesting birds, roosting bats, and other wildlife if individuals were to be roosting/nesting or otherwise inhabiting the buffer area during construction. Therefore, the mitigation measures provided below related to biological resources are proposed. Specifically, Mitigation Measure MM-BIO-1 would require the Project to include visible fencing in order to ensure that construction activities remain within the Project Site; Mitigation Measure MM-BIO-2 would require general wildlife surveys be completed prior to the commencement of construction activities in order to assess the presence of special-status wildlife on the Project Site.

***Mitigation Measures***

**MM-BIO-1:** The Project Area shall be demarcated with visible fencing in order to ensure the construction activities remain within the Project Site.

**MM-BIO-2:** General wildlife surveys shall be completed no more than 48 hours prior to commencement of construction activities to assess the presence of special-status wildlife in the Project Site. If wildlife is found, individuals would be allowed to leave the site on their own.

Implementation of the mitigation measures included above would ensure that potential construction-related impacts on special-status wildlife species would be less than significant. Therefore, construction of the Project would not 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 CDFW or U.S. Fish and Wildlife Service.

With regard to operation, the Project would involve the development of surface parking areas and ancillary improvements. As discussed above, no suitable habitat for special status plant species or natural vegetation communities exist on the Project Site. In addition, there is no suitable habitat for special-status wildlife species within the Project Site. The Project Site provides only marginal habitat and there are better foraging and nesting opportunities in the buffer area and in other open space areas adjacent to the buffer area. As such, the Project would not permanently involve the removal of important habitat for candidate, sensitive, or special status species. Furthermore, the Project does not involve fencing of the buffer area that will exist around the paved parking lot areas from adjacent hillsides, which means that to the extent any wildlife species access the buffer area when accessing adjacent hillsides, they would continue to be able to do so. Therefore, operation of the Project would not 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 CDFW or U.S. Fish and Wildlife Service. Operational impacts would be less than significant, and no mitigation measures are required.

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

**No Impact.** As previously described, the Project Site is bounded by the Santa Monica Mountains (open space) to the north, the I-405 to the east, Getty Center Drive to the south, and the Santa Monica Mountains to the west. The Project Site is currently unpaved and contains storm drain infrastructure for the site and the adjacent hillside. As discussed in the Biological Resources Assessment, no riparian or other sensitive natural community exists on the Project Site. Furthermore, as set forth in the Biological Resources Assessment, the Project Site is not located within a Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles. In addition, as discussed above, implementation of the mitigation measures included above would ensure that potential indirect impacts on native vegetation communities and special-status plants surrounding the Project Site would be less than significant. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community within the Project Site. No impacts would occur, and no mitigation measures are required.

**c. Would the project 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.** As previously described, the Project Site is bounded by the Santa Monica Mountains (open space) to the north, the I-405 to the east, Getty Center Drive to the south, and the Santa Monica Mountains to the west. As set forth in the Biological Resources Assessment, no wetlands exist on the Project Site or in the vicinity. As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures are required.

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

**Less Than Significant With Mitigation Incorporated.** As described above, the Project Site is bounded by the Santa Monica Mountains (open space) to the north, the I-405 to the east, Getty Center Drive to the south, and the Santa Monica Mountains to the west. The Project Site is currently graded and unpaved and contains storm drain infrastructure for the site and the adjacent hillside. The Project Site is separated from the I-405 Freeway by 50-inch-high concrete barriers topped with a mesh security fence, for a total barrier height of 8 feet.

As discussed in the Biological Resources Assessment, according to the CDFW, there are no California essential habitat connectivity areas or natural landscape blocks within the Project Site or buffer area. The closest natural landscape block is approximately 1.7 miles west within the Santa Monica Mountains. The Project Site supports only ruderal vegetation which is marginal habitat for wildlife and the areas to the south of the survey area are urbanized. However, the 300-foot buffer area is within undeveloped areas supporting native vegetation, and the hills on both sides of the survey area are undeveloped. The buffer area may be used for local foraging and wildlife movement; however, based on the conditions of the Project Site and urban development south of the survey area, most wildlife movement would be expected to be north and west of the Project Site, and wildlife use of the Project Site would be incidental. While direct impacts on wildlife movement are not anticipated, noise, dust, and vibration from Project construction activities could result in indirect impacts on wildlife within areas west and north of the Project Site. Thus, the Project would comply with the Migratory Bird Treaty Act and California Fish and Game Code and implement the mitigation measures included

above. Should construction activities occur during the nesting season, nesting bird surveys would be completed no more than 48 hours prior to commencement of construction activities to determine if nesting birds/raptors or active nests are within 300 feet (500 feet for potential raptor nests) of the Project Site. If nesting birds are found, measures to ensure that the birds/raptors and/or their nests are not harmed, would be implemented, including but not limited to, installation and maintenance of appropriate buffers (until nesting activity has ended. Additionally, as discussed above, Mitigation Measure MM-BIO-1 would require the Project to include visible fencing in order to ensure that construction activities remain within the Project Site and Mitigation Measure MM-BIO-2 would require general wildlife surveys be completed prior to the commencement of construction activities in order to assess the presence of special-status wildlife on the Project Site. Compliance with regulatory measures and implementation of mitigation measures would ensure protection of potential special status wildlife species to the extent they may be present. Therefore, compliance with regulatory measures and implementation of the mitigation measures included above would ensure that impacts on special-status wildlife species would be less than significant.

As discussed in the Biological Resources Assessment and the Protected Tree Report included in Appendix IS-2 of this Initial Study/MND, there are no trees on the Project Site; therefore, there are no trees on-site that could potentially provide suitable habitat or serve as a nesting site for migratory birds. In addition, the Project would not involve removal of any trees adjacent to the Project Site. Nonetheless, as discussed in the response to Question IV.a., above, construction activities, including removal of ruderal vegetation within the Project Site, could affect foraging and nesting habitat for wildlife species, particularly for birds. However, 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, of 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." 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. As previously discussed, should construction activities occur during the nesting season, nesting bird surveys would be completed no more than 48 hours prior to commencement of construction activities to determine if nesting birds/raptors or active nests are within 300 feet (500 feet for potential raptor nests) of the Project Site. If nesting birds are found, measures to ensure that the birds/raptors and/or their nests are not harmed, would be implemented, including but not limited to, installation and maintenance of appropriate buffers (until nesting activity has ended. Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not have a substantial adverse effect on nesting birds. Furthermore, as discussed in the Biological Resources Assessment, the Project Site provides only marginal habitat, the area of impact would be minimal, and there are better foraging and nesting opportunities in the buffer area.

Other potential impacts to wildlife in the area may include noise, dust, and vibration from construction activities, which could result in indirect impacts on nesting birds, roosting bats, and other wildlife if individuals were to be roosting/nesting or otherwise inhabiting the buffer area during construction. Thus, the Project would also implement the mitigation measures included above. Specifically, Mitigation Measure MM-BIO-1, would require the Project to include visible fencing in order to ensure that construction activities remain within the Project Site and Mitigation Measure MM-BIO-2 would

require general wildlife surveys be completed prior to the commencement of construction activities in order to assess the presence of special-status wildlife on the Project Site. These mitigation measures would ensure protection of potential special status wildlife species to the extent they may be present, and, therefore, compliance with regulatory measures and implementation of the mitigation measures included above would reduce potential impacts on wildlife species, including migratory birds, to less than significant levels.

With regard to operation, the Project would involve the development of surface parking areas and ancillary improvements. The Project Site would remain primarily as open land and would not involve fencing off the buffer area that will exist around the paved parking lot areas from adjacent hillsides, which means that wildlife species currently traversing the Project Site to access adjacent hillsides would continue to be able to cross the Project Site. Therefore, operation of 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. Operational impacts would be less than significant, and no mitigation measures are required.

**e. Would the project 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)?**

**No Impact.** The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) 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 4 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.

According to the Protected Tree Report for the Project included in Appendix IS-3 of this Initial Study/MND, there are no protected trees within the Project Site that would be removed as part of the Project. In addition, while there are seven protected trees upslope from Oak Parking Lot A, those trees would not be removed as part of the Project and an adequate setback area would be provided to avoid damage or loss during construction of the Project. Therefore, no impacts would occur, and no mitigation measures are required.

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

**No Impact.** As provided in the Biological Resources Assessment, no Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project

Site.[16] As provided in the Biological Resources Assessment, the closest Significant Ecological Area is approximately 1.60 miles west of the Biological Study Area in the Santa Monica Mountains. 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.

# 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. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

**No 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.

As previously discussed, the Project Site comprises two graded areas located immediately to the north of the Getty Center entrance. The Project Site is currently unpaved and contains storm drain

[16] CDFW, California Regional Conservation Plans, April 2019.

infrastructure for the site and the adjacent hillside. Based on a review of the SurveyLA Historic Resources Survey Report—Brentwood–Pacific Palisades Community Plan Area,[17] the HistoricPlacesLA database,[18] and the Los Angeles ZIMAS database, 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. Furthermore, the Project Site is not located within an existing Historic Preservation Overlay Zone. As no historic resources are located within the Project Site, implementation of the Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. No impacts would occur, and no mitigation measures are required.

**b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 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.

As described above, the Project Site comprises two graded areas located immediately to the north of the Getty Center entrance. The Project Site is currently unpaved and contains storm drain infrastructure for the site and the adjacent hillside. The Project Site was most recently used by Caltrans as a construction staging area for the I-405 Freeway Sepulveda Pass Widening Project. As part of this use, the Project Site was graded and is now unpaved. Since the Project Site has been previously disturbed and as the Project would require minimal additional grading, the potential for uncovering archaeological resources during construction of the Project is limited. Based on a records search conducted by the South Central Coastal Information Center (SCCIC), while there are currently no recorded archaeological sites mapped by the SCCIC within the Project Site, buried resources could potentially be unearthed during additional construction activities. In the event any archaeological materials are unexpectedly encountered during construction, 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 of the discovery would cease and the resource would be treated in accordance with the provisions of Section 21083.2. Compliance with the regulatory standards in Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5 would ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading activities. Therefore, given the lack of identified archaeological sites within the Project Site and compliance with the regulatory standards governing the treatment of any uncovered archaeological

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[17] City of Los Angeles, SurveyLA, Historic Resources Survey Report—Brentwood–Pacific Palisades Community Plan Area, November 2013.

[18] City of Los Angeles, HistoricPlacesLA, www.historicplacesla.org/map, accessed June 9, 2021.

resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource. The impact on archaeological resources would be less than significant, and no mitigation measures are required.

**c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

**Less Than Significant Impact.** As discussed above, the Project Site was most recently used by Caltrans as a construction staging area for the I-405 Freeway Sepulveda Pass Widening Project. As part of this use, the Project Site was graded and is currently unpaved. Since the Project Site has been previously disturbed and as the Project would require minimal additional grading, the potential for uncovering human remains is negligible. However, if human remains were discovered during construction of the Project, work in the immediate vicinity of the discovery 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, as amended. Therefore, with compliance with applicable regulatory requirements, any potential impacts related to human remains would be less than significant, and mitigation measures are not 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. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

**Less Than Significant Impact.** In order to determine if the Project would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during the construction or operation of the Project, an analysis of the Project's energy use for all phases of the Project has been provided. Section 15126.2(b) of the CEQA Guidelines refers to Appendix F of the CEQA Guidelines as guidance for the information to be provided in the analysis. Appendix F provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to the project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;

- The effects of the project on local and regional energy supplies and on requirements for additional capacity;

- The effects of the project on peak and base period demands for electricity and other forms of energy;

- The degree to which the project complies with existing energy standards;

- The effects of the project on energy resources; and

- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with the considerations above, the analysis below evaluates the potential energy impacts of the Project with a particular emphasis on whether the Project would result in the inefficient, wasteful, or unnecessary consumption of energy. The supporting energy calculations are included in Appendix IS-4 of this Initial Study/MND.

Electricity transmission to the Project Site is provided and maintained by the Los Angeles Department of Water and Power (LADWP) through a network of utility poles and underground utility lines. In addition, natural gas service in the vicinity of the Project Site is provided by the Southern California Gas Company (SoCalGas).

### Construction

During construction of the Project, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of parking areas, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

#### *Electricity*

Electricity would be supplied to the Project Site by LADWP and would be obtained from existing electrical poles near the Project Site. As shown in Table 3 on page 56, approximately 8,626 kWh of electricity would be consumed during Project construction, which is anticipated to span six months. This consumption of electricity would be a small fraction of that used for operation of the Getty Center and would represent 0.0001 percent of LADWP's projected sales in 2022. In addition, this demand would not significantly affect the ability of LADWP to accommodate peak local and regional electrical demands. The electricity demand at any given time would vary throughout the construction period

**Table 3**
**Summary of Energy Use During Construction[a]**

| Fuel Type | Quantity |
|---|---|
| **Electricity** | |
| Water Consumption | 5,299 kWh |
| Construction Temporary Power (Lighting, power tools) | 3,326 kWh |
| **Total Electricity** | **8,626 kWh** |
| **Gasoline** | |
| On-Road Construction Equipment | 660 gallons |
| Off-Road Construction Equipment | 0 gallons |
| **Total Gasoline** | **660 gallons** |
| **Diesel** | |
| On-Road Construction Equipment | 3,380 gallons |
| Off-Road Construction Equipment | 8,292 gallons |
| **Total Diesel** | **11,672 gallons** |

*kWh = Kilowatt-hour*

[a] *Detailed calculations are provided in Appendix IS-4 of this Initial Study/MND.*

*Source: Eyestone Environmental, 2022.*

based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.

### ***Natural Gas***

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support construction activities for the Project and there would be no demand generated by construction.

### ***Transportation Energy***

As shown in Table 3, on- and off-road vehicles would consume an estimated 660 gallons of gasoline and approximately 11,672 gallons of diesel fuel throughout the Project's construction. This consumption would represent 0.0008 percent of the 2022 annual on-road gasoline-related energy consumption and 0.00001 percent of the 2022 annual diesel fuel-related energy consumption in Los Angeles County. The consumption of petroleum-based fuels during construction would be temporary and would cease upon the completion of construction. The consumption of petroleum-based fuels would also vary throughout construction of the Project as certain phases of construction would require greater use of petroleum-based fuels compared to other phases of construction. Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also

result in efficient use of construction-related energy and reduce fuel consumption. On-road vehicles (i.e., haul trucks, worker vehicles) would also be subject to Federal fuel efficiency requirements. Therefore, the use of gasoline and diesel fuel during Project construction would not be wasteful, inefficient, or unnecessary.

#### ***Construction Materials***

Estimating the energy usage associated with the production/transport of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. However, it is expected that the materials which would be used during the Project's construction would be manufactured/produced in a facility which is in compliance with the applicable regulatory requirements such as Title 24 or CalGREEN requirements.

Additionally, it is expected that the transport of the materials would be in compliance with the applicable regulatory requirements regarding energy usage such as compliance with Federal Corporate Average Fuel Economy (CAFE) requirements.

Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

#### ***Conclusion***

Based on the above, construction of the Project would not have a substantial impact on local and regional energy supplies, peak demand for electricity, or energy resources. In addition, construction of the Project would comply with existing applicable energy standards and would not result in substantial transportation energy use. Thus, the Project's construction activities would not result in significant impacts associated with the wasteful, inefficient, or unnecessary use of energy resources.

### **Operation**

During operation of the Project, energy would be consumed mainly for lighting purposes, water usage, heating, ventilation or air conditioning (HVAC), and EV charging. The Project would not result in an increase in vehicle trips or employees. Annual energy use has been calculated for buildout of the Project and is shown in Table 4 on page 58.

#### ***Electricity***

After the construction of the Project is complete, there would be a net increase in electricity usage on the Project Site compared to existing conditions because the Project Site is currently vacant and generates no electricity.

**Table 4**
**Summary of Annual Energy Use During Operation[a]**

| Source | Project with Project Features |
|---|---|
| **Electricity** | |
| Building[b] | 978 MWh |
| Water | 8 MWh |
| **Total Electricity** | **986 MWh** |
| **Natural Gas** | **0 CF** |
| **Mobile[c]** | |
| Gasoline | 0 gallons |
| Diesel | 0 gallons |

*MWh = megawatt-hours*

*cf = cubic feet*

[a] *Detailed calculations are provided in Appendix IS-4 of this Initial Study/MND.*

[b] *Building electricity usage includes lighting for the parking lot and restroom as well as EV charging associated with 24 vehicle charging stations and two shuttle or bus charging stations. Use of the EV chargers would result in approximately 970 MWh of the annual building electricity usage with an equivalent reduction of 113,156 gallons of fossil fuels per year from vehicular travel.*

[c] *Although installation of EV-charging stations would reduce transportation fuel usage, the analysis conservatively did not take credit for this reduction.*

*Source: Eyestone Environmental, 2022.*

As shown in Table 4, with buildout of the Project, the on-site electricity demand would be approximately 986 MWh of electricity per year.[19] This electrical demand would represent a small fraction of the existing demand for electricity by the Getty Center and would represent 0.005 percent of LADWP's projected sales in 2022. In addition, the Project Site would result in a net increase in daily peak load of 216 kW. In comparison to the LADWP power grid base peak load of 5,845 MW in 2017, the Project Site net energy demand would represent 0.004 percent of the LADWP base peak load conditions. This demand would not significantly affect the ability of LADWP to accommodate peak electrical demands. In addition, the Project would comply with requirements of the Los Angeles Green Building Code and CalGreen/Title 24 energy efficiency requirements, which were adopted to reduce energy consumption. Such measures include use of LED lighting where appropriate. These features would reduce energy and water usage. In addition, 30 percent of the Project's parking spaces would be constructed to be capable of supporting future EV-charging stations with at least 10 percent of the parking spaces constructed with EV-charging stations. Specifically, the Project would include 24 vehicle charging stations and two shuttle or bus charging stations. Electrical usage from the installed EV charging-stations is also included in Table 4. As shown therein, use of the EV

[19] Electricity demand estimate includes electricity for the restroom, LED lighting and EV charging. Calculations are provided in Appendix IS-4 of this Initial Study/MND.

chargers would result in approximately 970 MWh of the annual building electricity usage with an equivalent reduction of 113,156 gallons of fossil fuels per year from vehicular travel. Therefore, the use of electricity during Project operations would not be wasteful, inefficient, or unnecessary.

***Natural Gas***

As discussed above, the Project would comply with requirements of the Los Angeles Green Building Code and CalGreen/Title 24 energy efficiency requirements. However, the Project would not require natural gas usage during Project operations. Therefore, the use of natural gas during Project operations would not be wasteful, inefficient, or unnecessary.

***Transportation Energy***

As discussed previously, the proposed parking and restroom uses would be ancillary to the Getty Center. The Project would supplement the existing parking supply at the Getty Center and would not involve the development of new trip generating uses because the Project does not propose any changes to existing admission tickets or programming at the Getty Center, which are the primary generators of traffic to the Getty Center. Thus, the Project would not result in an increase in vehicle trips or in the consumption of fuels related to vehicular travel to and from the Project Site. In addition, as discussed in more detail below, the Project would likely reduce vehicle trips, thereby reducing the consumption of fuels related to vehicular travel, because the Project would substantially eliminate the need to turn away visitors during peak visitor days, and the Project would eliminate the need for buses to leave the Getty Center and return later in the day due to insufficient bus parking. As such, operation of the Project would not result in an increase in the use of transportation energy.

As discussed above, the Project would also install EV-charging stations to encourage use of electric vehicles travelling to and from the site. While EV charging would increase the usage of electricity, transportation fuel use would be reduced due to a reduction in vehicle miles traveled using fossil fuels. Although installation of EV-charging stations would reduce transportation fuel usage, as a conservative approach, the analysis does not take credit for this reduction.

***Conclusion***

Based on the above, operation of the Project would not have a substantial impact on local and regional energy supplies, peak demand for electricity, or energy resources. In addition, operation of the Project would comply with existing applicable energy standards and would not result in additional transportation energy use. Thus, Project operations would not result significant impacts associated with the wasteful, inefficient, or unnecessary use of energy resources.

**b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Less Than Significant Impact.** The Project would be designed to comply with all applicable state and local codes, including the City's Green Building Ordinance and the California Green Building Standards Code. Design features that would be implemented would include the use of efficient lighting technology within the proposed surface parking areas and restroom as well as trees that would develop large canopies to shade the surface parking areas and reduce the heat island effect.

In addition, the Project would incorporate a variety of water conservation features, including the installation of planters to capture and reuse stormwater that would also promote energy conservation. As set forth in Executive Order (EO) B-48-18, signed by Governor Edmund G. Brown Jr. on January 26, 2018, state entities should work to "spur the construction and installation of… 250,000 zero-emission vehicle chargers, including 10,000 direct current fast chargers, by 2025."[20] Furthermore, the 2019 Sustainable City pLAn/L.A.'s Green New Deal established a target of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028. As such, the installation of EV ready and EV-charging stations as part of the Project would support these goals. Electricity provided to the Project Site would be sourced from the LADWP which currently generates a portion of power from renewable resources. Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would represent a small fraction of LADWP's projected and planned sales. Similarly, petroleum-based fuels during construction would also represent a small fraction of the 2022 projected fuel use in Los Angeles County. Finally, as discussed above, operation of the Project would not generate vehicle trips. Thus, the Project would not generate vehicle miles traveled and would not conflict with the goals of SCAG's RTP/SCS regarding reducing vehicle miles traveled. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

## 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? | ☐ | ☐ | ☒ | ☐ |

[20] California EO B-48-18 (Jan. 26, 2018).

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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 Engineering Report (Geotechnical Report) prepared for the Project by Terracon Consultants, Inc., dated June 7, 2017 (Revised August 20, 2019). All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-5 of this Initial Study/MND.

**a. Would the project 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.

Based on the Geotechnical Report, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area.[21] The closest active fault is the Newport-Inglewood Fault Zone, which is located approximately 1.5 miles southeast of the Project Site.[22] Furthermore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The Project would also not involve mining operations, deep excavations thousands of feet into the earth, or boring of large areas, which would create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation measures are required.

### ii. Strong seismic ground shaking?

**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 noted above, no active faults are known to pass directly beneath the Project Site. The closest active fault is the Newport-Inglewood Fault Zone, located approximately 1.5 miles southeast of the Project Site. According to the Geotechnical Report, the Newport-Inglewood Fault is an active feature capable of generating future earthquakes. A maximum moment magnitude of 7.1 is estimated for the Newport-Inglewood Fault. However, as previously noted, the Project involves the construction of two surface parking areas and ancillary improvements, including a one-story, approximately 250-square-foot restroom station. The Project would not involve the construction of any structures that would be regularly occupied such as commercial or residential uses. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking. Notwithstanding, the proposed restroom station would be construction in accordance with applicable state and local code requirements regarding seismic ground shaking that 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. 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 Los Angeles Building Code relating to seismic safety, and the application of accepted and proven

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[21] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021.

[22] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021.

construction engineering practices. Thus, impacts related to strong seismic ground shaking would be less than significant, and no mitigation measures are 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. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. Although the Project Site is not located within a City-designated liquefiable or potentially liquefiable area, the Project Site is located within a state-designated potentially liquefiable area.[23,24] As provided in the Geotechnical Report, a liquefaction analysis for the Project Site was performed in accordance with the *Special Publication 117A, Guidelines for Analyzing and Mitigating Seismic Hazards in California* and City requirements. The site-specific liquefaction analysis was performed to a depth of 50 feet below ground surface. According to the results of the liquefaction analysis, the seismically induced total and differential settlement for the 2,475 years return period is estimated to be less than 1 inch and the seismically induced total and differential settlement for the 475 years return period is estimated to be less than 0.5 inch. The Los Angeles Department of Building and Safety (LADBS) limits the total allowable settlement (including seismic) to 4 inches and the total allowable differential settlement (including seismic) to 2 inches. The total and differential settlements for both return periods (including seismic) of the mat foundation of up to 1 inch and 0.5 inch would be less than the limits set forth by the LADBS. Thus, the Project would not directly or indirectly cause potential substantial adverse effects involving seismic-related ground failure, including liquefaction. As such, impacts would be less than significant, and no mitigation measures are required.

### iv. Landslides?

**Less Than Significant Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. Based on the Geotechnical Report, there are several geomorphic expressions suggestive of evidence of ancient deep-seated landslides on the generally east-facing slope adjacent to the Project Site. Additionally, the Project Site is located in a landslide area as mapped by the State[25] and the City of Los Angeles.[26,27] As discussed in the Geotechnical Report, the California Division of Mines and Geology also concluded that the Project Site is located within a State earthquake-induced landslide hazard zone. As previously discussed, the Project involves the development of two new surface parking areas and ancillary improvements, including a one-story, approximately 250-square-foot restroom station. This proposed use would not introduce a new population or buildings that would be regularly occupied which could be affected by a landslide event

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23 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021.

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

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

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

27 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021.

in the adjacent hillsides. Notwithstanding, the Project would be limited to the boundaries of the Project Site and would not include construction activities in the surrounding hillsides such that the stability of the surrounding hillsides would be compromised and result in a landslide event. Furthermore, upon buildout of the Project, the existing topography of the Project Site would not be substantially altered, and the Project Site would remain flat. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. Impacts would be less than significant, and no mitigation measures are required.

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

**Less Than Significant Impact.** The Project Site currently consists of two graded areas that were previously used by Caltrans for construction staging. Development of the Project would require minimal grading, which has the potential to disturb existing soils underneath the Project Site and further 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 the 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 operation, the potential would be negligible since the Project Site would be paved and landscaped. 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.

**c. Would the project 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.** As discussed above, the Project Site is located in a landslide area as mapped by the State and the City of Los Angeles. However, the Project would not include construction activities in the surrounding hillsides such that the stability of the surrounding hillsides would be compromised and result in a landslide event. Furthermore, upon buildout of the Project, the existing topography of the Project Site would not be substantially altered, and the Project Site would remain flat. As such, impacts related to landslides would be less than significant, and no mitigation measures are required.

As previously discussed, liquefaction-related effects include lateral spreading. Although the Project Site is located within a state-designated potentially liquefiable area, the potential for lateral spreading is low since liquefiable saturated sands are not anticipated at the maximum depth analyzed. As such, impacts related to lateral spreading would be less than significant, and no mitigation measures are required.

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 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, based on the Geotechnical Report, the Project Site is located within a state-designated potentially liquefiable area; however, based on the subsurface conditions encountered at the Project Site, the Geotechnical Report test results, and the depth to groundwater, liquefiable saturated sands are not anticipated at the maximum depth analyzed. Therefore, 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. According to the Geotechnical Report, consolidation/collapse tests indicate that the fill materials consisting of clayey sand materials encountered at approximate depths of 5 feet, 10 feet, and 35 feet have a slight collapse potential when saturated under normal footing loads of 2,000 pounds per square foot. However, with implementation of the foundation recommendations set forth in the Geotechnical Report, impacts related to collapse would be less than significant. Specifically, the foundation design recommendations establish a minimum of 5 feet for use of engineered fill. This would require replacement of on-site soils with engineered fill, which would enhance the stability of on-site soils. In addition, while some minimal additional grading would be required as part of the Project, no deep excavations would occur that would extend to a depth of 10 feet or 35 feet where potentially collapsible materials were encountered. Specifically, the deepest grading would occur at between 5 and 5.5 feet on approximately 0.025 percent of the Project Site. For the remainder of the Project Site no grading would occur on approximately 59.070 percent of the Project Site, grading to a depth of 0 to 1 foot would occur on approximately 32.594 percent of the Project Site, and grading to a depth of 1 to 5 feet would occur on approximately 8.31 percent of the Project Site.

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. Impacts would be less than significant, and no mitigation measures are required.

**d. Would the project 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. According to the Geotechnical Report, expansion index testing on near surface fill materials consisting of clayey sand soils indicates an expansion index of 30 and an expansion index between 20 to 35 indicates a low expansion potential.[28] In addition, as set forth in the Geotechnical Report, any soils removed would be replaced with foundation materials with a very low expansion potential (a maximum expansion index of 20). Therefore, through the removal of underlying soils as well as the subsequent

[28] ScienceDirect, Expansive Soils, www.sciencedirect.com/topics/engineering/expansive-soil, accessed June 9, 2021.

use of engineered soils, any potential effects associated with expansive soils would be addressed. Thus, the Project would not create substantial direct or indirect risks to life or property due to expansive soils. Impacts related to expansive soils would be less than significant, and no mitigation measures are required.

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

**No Impact.** The Project Site is located within a community served by existing sewage infrastructure. The Project's wastewater demand associated with the proposed restroom station 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.

**f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant Impact.** 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 area are extinct. Section 5097.5 of the Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, the California Penal Code Section 622.5 sets the penalties for damage or removal of paleontological resources.

As previously discussed, the Project Site has been subject to grading 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-6 of this Initial Study/MND indicates there are no previously encountered fossil vertebrate localities located directly within the Project Site. Almost all of the Project Site likely contains 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 the elevated terrain in or adjacent to the Project Site and underlying the younger Quaternary Alluvium, there are exposures of the Jurassic Santa Monica Slate, fine-grained rock units of metamorphosed deep water marine sediments. Nevertheless, as no deep excavation would occur with the deepest grading at between 5 and 5.5 feet occurring only on approximately 0.025 percent of the Project Site with the vast majority of the Project Site experiencing grading of less than 1 foot, and as the Project Site has been subject to grading in the past, it is unlikely that development of the Project would uncover significant vertebrate fossils. Therefore, given that the Project Site was previously graded and that no deep excavation would occur, the Project's impact on paleontological resources would be less than significant, and no mitigation measures are required.

With regard to a unique geologic feature, as previously discussed, the Project Site is located adjacent to the Santa Monica Mountains. However, construction activities would be confined to the Project Site

and would not alter the existing mountain ridge located west of the Project Site. 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 are 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. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

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

**Less Than Significant Impact.** Section 15064.4 of the CEQA guidelines recommends quantification of a Project's GHG emissions. However, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Nonetheless, the quantification of the Project's GHG emissions is being done for informational purposes only. The Project would generate an incremental contribution to and cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

## Construction

GHG emissions from construction activities were forecasted using a reasonable estimate of construction schedule and phasing and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix IS-1 of this Initial Study/MND).

As presented in Table 5 on page 69, construction of the Project is estimated to generate a total of 197 metric tons of GHGs measured as an equivalent mass of carbon dioxide ($MTCO_2e$). As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix IS-1 of this Initial Study/MND.

**Operation**

The Project would result in direct and indirect GHG emissions generated by the increase in energy usage related to lighting of the proposed surface parking areas and restroom, which would include energy-efficient lighting as well as the EV-charging stations. As discussed previously, the Project would not generate additional vehicle trips. The Project would also not consume natural gas during operations nor require the use of natural gas for space heating and cooling or water heating. The Project would comply with the requirements under Title 24 and the Los Angeles Green Building, which would serve to reduce GHG emissions.

Operational emissions from the sources described above were estimated using CalEEMod for the Project in order to determine the net incremental change in GHG emissions. Electricity usage for operations was calculated based on usage of LED lighting for 12 hours per day. In addition, the Project would provide EV charging for approximately 12 percent of the Project's parking spaces. Electricity usage from EV-charging stations was also included in the GHG inventory. As shown in Table 6 on page 70, the Project with implementation of Title 24 and Los Angeles Green Building Code requirements including use of LED lighting and EV charging would result in approximately 315 $MTCO_2e$ annually.

As shown in Table 4 on page 58, EV charging would increase the usage of building electricity by approximately 970 MWh annually, which would result in an equivalent reduction of 113,156 gallons of fossil fuels annually associated with transportation fuel. As discussed in more detail below, the current LADWP power mix includes over 33 percent of renewable energy. Vehicle miles traveled powered by electricity would be lower in comparison to vehicle miles traveled using fossil fuels. Although installation of EV-charging stations would reduce transportation fuel usage and associated GHG emissions, the analysis conservatively did not take credit for this reduction.

***Consistency with Applicable Plans and Policies***

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, into law. AB 32 commits the State to reducing GHG emissions to 80 percent below 1990 levels by 2050.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020.

**Table 5**
**Construction-Related GHG Emissions**
**($MTCO_2e$)**

| Year | $MTCO_2e$[a] |
|---|---|
| 2022 | 197 |
| Total | 197 |
| **Amortized Over 30 Years**[b] | **7** |

*MTCO2e = metric tons of an equivalent mass of carbon dioxide*

[a] *CO2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix IS-1 of this Initial Study/MND.*

[b] *As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.*

*Source: Eyestone Environmental, 2022.*

EO B-30-15, which was issued in April 2015 by Governor Brown, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide Greenhouse Gas (GHG) emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.[29] The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[30]

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Update). The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic

[29] Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

[30] CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.

**Table 6**
**Operational Greenhouse Gas Emissions[a]**

| Emission Source | Project Without Project Design Features $CO_2e$ (metric tons) |
|---|---|
| Area[b] | <1 |
| Energy[c] | 315 |
| Mobile | 0 |
| Stationary | 0 |
| Solid Waste | <1 |
| Water/Wastewater[d] | 1 |
| Construction | 7 |
| **Total Emissions** | **323** |

*Note: Numbers may not add up exactly due to rounding.*

[a] *$CO_2e$ was calculated using CalEEMod and the results are provided in the Operation CalEEMod output file within Appendix IS-1 of this Initial Study/MND.*

[b] *Area source emissions are from landscape equipment.*

[c] *Energy source emissions are based on calculated electricity usage rates for LED lighting and EV charging stations.*

[d] *Water/Wastewater includes restroom and landscaping usage.*

*Source: Eyestone Environmental, 2022.*

growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constraints and reduces emissions at covered sources.[31]

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.[32] The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.[33]

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in

[31] CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 6.

[32] CEQA Guidelines Section 15064.7(c).

[33] CEQA Guidelines Section 15130 (f).

making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.[34,35] The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.[36] A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.[37]

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is SCAG's 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates, SCAG's Sustainable Communities Strategy, City of Los Angeles Green LA Action Plan (LA Green Plan)/ClimateLA, and Sustainable City pLAn/L.A.'s Green New Deal.

A significant impact would occur if the Project would conflict with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Sustainable City pLAn/L.A. Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As discussed previously, the Project would not generate any new vehicle trips or increase congestion at nearby intersections. In addition, the Project would not result in a net increase in solid waste. Therefore, the following consistency discussion is limited to energy-related plans and policies. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

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34 CEQA Guidelines Section 15064.4(a).

35 CEQA Guidelines Section 15064.4(a).

36 CEQA Guidelines Section 15064.4(a)(1)-(2).

37 CEQA Guidelines Section 15064.4(b).

***CARB's Climate Change Scoping Plan***

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

***Mandatory Regulatory Compliance Measures***

The following applicable mandatory reduction actions/strategies would serve to indirectly reduce Project GHG emissions.

- **RPS Program and SB 2X:** The California RPS program (Updated under Senate Bill (SB) 2X) requires that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016. Electricity GHG emissions provided above in Table 6 on page 70 assume that LADWP will receive at least 33 percent of its electricity from renewable sources by the year 2020 and 50 percent by the year 2030 (with a straight line interpolation for the Project buildout year of 2022) consistent with SB 350. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of $CO_2$e per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2022 renewables portfolio. It is noted that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026 and, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements inasmuch as the Project is served by LADWP, which is committed to achieving the increase in renewable energy resources by the required dates. The electricity-related GHG emissions provided in Table 6 conservatively do not account for the additional 17 percent reduction in $CO_2$e per MWh that would be achieved by LADWP in year 2022 prior to buildout of the Project (difference between the 33 percent renewables assumed for the buildout year of 2022 and 50 percent required under SB 100 in year 2026) or 27 percent reduction achieved by LADWP in year 2030 (difference between the 33 percent renewables assumed for the buildout year of 2028 and 60 percent required under SB 100 in year 2030). Given LADWP's progress towards meeting and exceeding the established targets as well as potential penalties for non-compliance, it is assumed LADWP will comply.

- **Cap-and-Trade Program:** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to the Project. That being said, while not quantified in this analysis, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year presented in Table 6 on page 70 would indirectly be covered by the Cap-and-Trade Program.

- **SB 350:** As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-

sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this action/strategy because it includes energy-efficient LED lighting for the proposed surface parking areas and restroom.

***Applicable Scoping Plan Measures***

Further evaluation of project design features and specific applicable polices and measures in the Scoping Plan is provided below. As shown below, the Project would not conflict with the policies included in the Scoping Plan.

- **Energy Independence and Security Act of 2007 (EISA):** EISA requires phasing out of incandescent light bulbs sold in the United States resulting in 25 percent greater light bulb efficiency in 2014 and 200 percent greater efficiency in 2020. CalEEMod does not incorporate this nationwide reduction in electricity usage associated with lighting. The Project would not conflict with this requirement as the Project would incorporate energy-efficient LED lighting for the proposed surface parking areas and restroom. Electricity GHG emissions provided in Table 6 on page 70 account for LED lighting electricity consumption.

- **CCR, Title 24, Building Standards Code:** The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The Project would not conflict with the regulatory requirements as the Project must comply with applicable provisions of the 2017 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The Project would further support this regulation since the Project would incorporate energy-efficient LED lighting within the proposed surface parking areas, reducing overall energy usage compared to baseline conditions. In addition, lighting and energy usage for the restroom structure would comply with Title 24 standards.

- **Assembly Bill 1109 (AB 1109):** The Lighting Efficiency and Toxic Reduction Act establishes standards structured to reduce average statewide electrical energy consumption by not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.[38] The Project would not conflict with the requirements under AB 1109 because it complies with local and state green building programs and incorporates energy-efficient LED lighting within the proposed surface parking areas and restroom.

***SCAG 2020–2045 RTP/SCS***

The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy 2020–2045 RTP/SCS) was approved on September 3, 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people

[38] Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534

would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier as a result of an expanded regional charging network.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[39] Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation.[40] The SB 375 target focuses on the amount of vehicle travel per capita. The reductions generated by fuel economy improvements are already included as part of the State's GHG emissions reduction program and are not double-counted in the SB 375 target calculation.[41]

As the Project would not generate any new vehicle trips, the Project would not conflict with the implementation and goals of the 2020–2045 RTP/SCS with regard to vehicle miles traveled (VMT). However, the 2020–2045 RTP/SCS does include measures to improve energy efficiency. The Project's consistency with energy efficiency category of strategies and policies is discussed in more detail below.

***Energy Efficiency Strategies and Policies***

One goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. All Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs which would reduce energy usage 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 not be limited to, reduction of outdoor water use; drip irrigation systems; and water-efficient landscape design including drought tolerant plants. Restroom fixtures would also comply with the City of LA Green Building code which requires a 20-percent reduction in water usage based on the City of LA Plumbing Code. The Project would use LID techniques to minimize the amount of stormwater that leaves the Project Site.

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39 SCAG, Final 2020–2045 RTP/SCS, Making Connections, May 7, 2020, p. 5.

40 California Air Resources Board, Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, June 2017, p. B-32.

41 California Air Resources Board, SB 375 Regional Greenhouse Gas Emissions Reduction Targets, Staff Report, p. 28.

### ***City of Los Angeles Sustainable City pLAn/City of LA Green New Deal***

The City of Los Angeles began addressing the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan/ClimateLA) in 2007. This plan outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Building Code, as discussed below.

Building upon the LA Green Plan, the Sustainable City pLAn was adopted in 2015 and includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Sustainable City pLAn provides information as to what the City will do with buildings and infrastructure in their control, and provides specific targets related to mobility and transit, including the reduction of VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. Although the Sustainable City pLAn mainly targets GHG emissions related to City-owned buildings and operations, certain reductions would also benefit the Project. Such measures include increasing renewable energy usage to 100 percent by 2045 which would reduce energy related emissions. In 2019, the first four-year update to the 2015 Sustainable City pLAn was released. This updated document, known as the City's Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals such as the installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028.[42]

As discussed previously, the Project would not generate any additional trips and would not conflict with goals related to VMT or waste reduction. In addition, the Project would use LED lighting to minimize use of electricity, use native and drought-tolerant plant species in the landscaping to minimize water use, and would also develop 30 percent of the Project's parking spaces as electric vehicle (EV) ready with at least 10 percent of the parking spaces installed with EV-charging stations (at this time 24 vehicle charging stations and two shuttle or bus charging stations are proposed) to assist in the reduction of GHG emissions from vehicles. Installation of EV-charging stations would also be consistent with the L.A. Green New Deal goal of increasingly publicly available EV charging infrastructure. These EV charging stations would facilitate trips in zero emission vehicles, resulting in a reduction of GHG emissions.[43] Therefore, the Project would be consistent with the Sustainable City pLAn and the L.A. Green New Deal.

### **Conclusion**

In summary, the Project would not generate GHG emissions that may have a significant impact on the environment nor would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Specifically, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth

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42 City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.

43 However, as a conservative assumption, the GHG analysis did not take credit for this reduction.

while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CalGreen Building Code. As discussed above, the Project would not generate any new vehicle trips and would therefore also not conflict with SCAG's 2020–2045 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity, use native and drought-tolerant plant species in the landscaping to minimize water use, and would include EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. As such, the Project would comply with the Sustainable City pLAn/L.A.'s Green New Deal. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts related to GHG emissions would be less than significant.

# 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? | ☐ | ☐ | ☒ | ☐ |
| 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 *Site Investigation Report* prepared for the Project Site by Stantec, dated August 5, 2015. All specific information on historic and existing on-site conditions in the discussion below is based on the Site Investigation Report unless otherwise noted. The Site Investigation Report is included as Appendix IS-7 of this Initial Study/MND.

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

**Less Than Significant Impact.** Construction of the Project would not involve the routine transport of hazardous materials to and from the Project Site. During on-site grading and 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 Project construction. 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, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. Construction activities would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by the City of Los Angeles Department of Building and Safety. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in surface parking areas and restrooms, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with the use of cleaning products currently used at the Getty Center and other nearby uses. In addition, 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. Due to the type of development proposed, operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site.

Therefore, with implementation of applicable 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 construction and operation of the Project would be less than significant, and no mitigation measures are required.

**b. Would the project 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 Site Investigation Report provided in Appendix IS-7 of this Initial Study/MND included a review of environmental records for the Project Site and a site reconnaissance that included 59 borings to identify potential on-site hazards. As discussed in Section 3, Project Description, of this Initial Study/MND, the Project Site was most recently used by the California Department of Transportation (Caltrans) and the Los Angeles Metropolitan Transportation Authority (Metro) as a construction staging area for the I-405 Freeway Sepulveda Pass Widening Project. As part of this use, the Project Site was graded. As such, the Project Site is currently unpaved with a gravel surface.

Provided below is a summary of the findings of the Site Investigation Report 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, limited excavation, on-site grading, and 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 discussed in the Site Investigation Report, the soil samples analyzed detected concentrations of total petroleum hydrocarbons (TPH), VOCs, semi-volatile organic compounds (SVOCs), chlorinated herbicides, and polychlorinated biphenyls (PCBs) did not exceed United States Environmental Protection Agency (USEPA) Region 9 Regional Screening Levels (RSLs) for commercial/industrial exposure. Additionally, for the majority of the Project Site, detected concentrations of total lead were reported at concentrations below the USEPA commercial/industrial RSL and below the California Department of Toxic Substances Control-modified Screening Level (DTSC-SL) for industrial soil. One sample was reported at a concentration above the DTSC-SL for industrial soil only while another sample was reported at a concentration above the DTSC-SL, USEPA commercial/industrial RSL, and

the California total threshold. Nonetheless, based on the number of samples and the reported concentrations, the Soil Investigation Report concluded that the Project Site does not appear to be impacted with concentrations of constituents of concern at levels that pose a significant increase in health risk or at concentration above hazardous waste thresholds. Thus, no further investigation was recommended by the Soil Investigation Report. In addition, as discussed in more detail below, the Project would comply with the provisions set forth in the Hazardous Waste Operations and Emergency Response Standard to avoid potential hazardous waste impacts during construction. Furthermore, as previously discussed, given that the Project Site was previously graded, it is unlikely that development of the Project would encounter contaminated soils. Nevertheless, 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, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving TPH, VOCs, SVOCs, or PCBs.

The Site Investigation Report also included the testing for Title 22 metals and asbestos. Based on the Site Investigation Report, Title 22 metals did not exceed USEPA commercial/industrial RSLs except for arsenic. One sample reported arsenic at 40 mg/kg, which exceeds the DTSC upper limit for background of 12 mg/kg and other samples reported arsenic above the USEPA commercial/industrial RSL but below the DTSC upper limit. However, based on the number of samples and the reported concentrations, the Soil Investigation Report concluded that the Project Site does not appear to be impacted with concentrations of constituents of concern at levels that pose a significant incremental increase in health risk to non-residential receptors. Thus, no further investigation was recommended by the Soil Investigation Report. In addition, as discussed in more detail below, the Project would comply with the provisions set forth in the Hazardous Waste Operations and Emergency Response Standard. 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.[45] Additionally, as discussed in the Site Investigation Report, asbestos was not detected in any of the samples analyzed. As such, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving Title 22 metals and asbestos.

Overall, the Site Investigation Report concluded that 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 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. Furthermore, the Project would comply with the provisions set forth in the Hazardous Waste Operations and Emergency Response Standard (29 United States Code sec 651 *et seq*.; 29 Code of Federal Regulations 1910.120; 40 Code of Federal Regulations 311), which requires a written health and safety program, worker training, emergency response training, medical

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[44] SCAQMD. Rules and Compliance, Rule 1166, adopted August 5, 1988..

[45] SCAQMD. Rules and Compliance, Rule 1166, adopted August 5, 1988.

surveillance, and measures to reduce worker exposure to hazardous waste. 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.[46] 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.

***Underground and Aboveground Storage Tanks***

As discussed in Section 3, Project Description, of this Initial Study/MND, the Project Site was previously substantially graded. No underground storage tanks (USTs) were identified within the Project Site as part of the Site Investigation Report and no USTs have been recorded in the State's GeoTracker.[47] As part of the Project, some minimal additional grading would be required. As no deep excavation activities would occur, construction activities associated with the Project would not be anticipated to encounter any undocumented USTs. In addition, there are no aboveground storage tanks (ASTs) onsite. 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, through 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 associated with USTs or ASTs, and impacts related to the potential removal of USTs and ASTs during construction would be less than significant, and no mitigation measures are 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 asbestos-containing materials (ACMs). As discussed, the Project Site was previously substantially graded and currently consists of two unpaved, vacant lots. Given the existing use of the Project Site, no ACMs are anticipated on the Project Site. In addition, as discussed in the Site Investigation Report, asbestos was not detected in any of the samples analyzed. As such, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment and 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. Impacts related to the removal of ACMs during construction activities would be less than significant, and no mitigation measures are required.

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[46] SCAQMD. Rules and Compliance, Rule 1166, adopted August 5, 1988.

[47] State of California, GeoTracker, https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=los+angeles, accessed June 10, 2021.

### ***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. Given the Project Site's existing use as two unpaved, vacant lots, lead-based paint (LBP) is not likely to occur onsite. Thus, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into 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 impacts related to the removal of LBP during construction activities would be less than significant, and no mitigation measures are 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, detected concentrations of PCBs did not exceed USEPA Region 9 RSLs for commercial/industrial exposure. 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 impacts related to the removal of PCBs during construction activities would be less than significant, and no mitigation measures are required.

### ***Oil Wells and Methane Gas***

Based on the Division of Oil, Gas & Geothermal Resources Online Mapping System, there are no oil wells within the Project Site or the surrounding area. As such, 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 no impacts associated with oil wells during operation would occur.

The Project Site is also not within an active or inactive oil field and is not within a Methane Zone or Methane Buffer Zone identified by the City.[48] 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 the release of methane gas during operation would be less than significant.

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 construction-related impacts would be less than significant, and no mitigation measures are required.

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[48] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021.

## Operation

### *Hazardous Waste Generation, Handling, and Disposal*

As discussed above, operation of the Project Site would involve the routine use of small quantities of potentially hazardous materials typical of those used in surface parking areas and restrooms. 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.

### *Underground and Aboveground Storage Tanks*

Development of the Project includes the development of two surface parking areas on the Project Site. The Project does not propose the installation of USTs or ASTs. 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 USTs and ASTs during operation of the Project would be less than significant.

### *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.

### *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.

### *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.

***Oil Wells and Methane Gas***

The Project does not include the installation of 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.

The Project Site is not within an active or inactive oil field and is not within a Methane Zone or Methane Buffer Zone identified by the City.[49] 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 the release of methane gas during operation would be less than significant.

Based on the above, 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 during operation of the Project would be less than significant, and no mitigation measures are required.

**c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Less Than Significant Impact.** The nearest school to the Project Site is at the Leo Baeck Temple located across the I-405 Freeway approximately 820 feet from the Project Site. 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 within 0.25 mile of a school would be less than significant.

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

**No Impact.** Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Government Code Section

[49] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021.

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 the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites, State Response sites, Voluntary Cleanup sites, and School Cleanup sites.

Based on a review of the EnviroStor database, the Project Site is not identified on any of the above lists.[50] In addition, the Project Site is not on the State Water Resources Control Board's Geotracker Database, which provides a list of leaking underground storage tank sites that are included on the Cortese List.[51] Lastly, the Project Site is not listed on CalEPA's list of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) or list of contaminated solid waste disposal sites.[52,53] As such, no impacts with regard to listing as a hazardous materials site would occur and no mitigation measures would be necessary.

**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 is Santa Monica Airport, located approximately 8 miles from the Project Site. Given the distance between the Project Site and Santa Monica Airport, the Project would not have the potential to 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.

**f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** According to the Safety Element of the City of Los Angeles General Plan, the closest disaster routes to the Project Site include the I-405 Freeway and Sepulveda Boulevard, located adjacent to the Project Site. Based on the area of the Project Site and the proposed use as surface parking, construction activities for the Project would be confined to the Project Site. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Sepulveda Boulevard and Getty Center Drive. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. As part of the I-405 Freeway

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50 Department of Toxic Substances Control, Envirostor Database, www.envirostor.dtsc.ca.gov/public/map/?myaddress=1200+getty+center+drive%2C+los+angeles%2C+ca, accessed June 10, 2021.

51 State of California, Geotracker, https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=1200+getty+center+drive%2C+los+angeles%2C+ca+, accessed June 10, 2021.

52 California Environmental Protection Agency, List of "Active" CDO and CAO from Water Board, https://calepa.ca.gov/SiteCleanup/CorteseList/, accessed June 10, 2021.

53 California Environmental Protection Agency, List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit.

Sepulveda Pass Widening Project, Caltrans widened the access road to the Project Site from Getty Center Drive to 24 feet so that it can accommodate fire trucks and emergency access. Therefore, the Project would not impede emergency access within the Project Site vicinity or cause an impediment along the City's designated disaster routes such that it would impair the implementation of the City's emergency response plan. Therefore, Project impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required.

**g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**Less Than Significant Impact.** The Project Site is located within a City-designated Very High Fire Hazard Severity Zone[54] and within a City-designated fire buffer zone.[55] Projects located within a Very High Fire Hazard Severity Zone must comply with the requirements set forth for the Mountain Fire District, as outlined in Section 57.25.01 of the LAMC. These requirements include the use and placement of construction materials, greenbelt requirements, the use of fire-resistant plants and materials, and the regular clearing of brush. As previously discussed, the Project involves the construction of two surface parking areas and ancillary improvements, including a restroom station, light poles, trash receptacles, and an emergency phone. Given the proposed use of the Project Site for surface parking, the Project would not include habitable buildings or other structures that would be regularly occupied. As such, the Project would not be expected to expose people or structures to wildland fires. In addition, as discussed in Section 3, Project Description, of this Initial Study/MND, the Project is designed to reduce wildfire related threats in the Santa Monica Mountains in several ways. First, the Project provides increased access in the Sepulveda Pass area for LAFD and other emergency responders. As part of the I-405 Freeway Sepulveda Pass Widening Project, Caltrans widened the access road to the Project Site to 24 feet so that it can accommodate fire trucks and emergency access. The Project involves extending water conveyance infrastructure under this access road into the Project Site, where fire hydrants will be installed to enable LAFD to use the parking lot areas to help protect the surrounding communities from fire danger in the event of a wildfire. The Getty Center will also make the new parking areas available to LAFD and other emergency responders as a staging area in the event of an emergency, like other areas on the Getty Center property. In addition, the Getty Center will install drought tolerant landscaping and irrigation on the Project Site, which will help reduce the risk of fire in and around the parking areas. Furthermore, the Project would be developed and rehabilitated 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. Impacts associated with wildland fires would be less than significant, and no mitigation measures are required.

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[54] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed June 10, 2021. 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.

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

# 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? | ☐ | ☐ | ☐ | ☒ |
| 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 Report* (Hydrology and Water Quality Report) prepared for the Project by KPFF Consulting Engineers, dated March 9, 2022, and included as Appendix IS-8 of this Initial Study/MND.

**a. Would the project 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. Thus, Project-related construction activities could have the potential to result in adverse effects on water quality. 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.

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.

### *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 with most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Operation of the Project is anticipated to generate pollutants including sediment, nutrients, pesticides, pathogens, trash and debris, and oil and grease. 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 Report, runoff is currently captured into several existing debris basins and makes its way into the stormdrain system through several open channels with culverts and headwalls and below-ground reinforced concrete pipes (RCP). As part of the Project, several catch basins that capture the sheet flow-based runoff would be installed. The stormwater would then be directed to environmental passive integrated chamber (EPIC) planters for treatment and storage, and overflow of the EPIC system would be discharged to the existing channel and existing 48-inch pipe. Overall, implementation of the LID features would result in an improvement in surface water quality runoff as compared to existing conditions and 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.

### Groundwater Quality

#### *Construction*

According to the Geotechnical Engineering Report included in Appendix IS-5 of this Initial Study/MND, groundwater was encountered at a depth of approximately 55 feet below ground surface. As discussed above, while some minimal additional grading would be required as part of the Project, no deep excavations would occur that would extend to the depth at which groundwater was previously encountered. Therefore, based on the depth at which groundwater was encountered at the Project Site, construction activities are not expected to encounter groundwater and temporary dewatering would not be required. As such, groundwater quality would not be impacted from dewatering activities.

Other potential effects to groundwater quality could result from the presence of an UST or during the removal of an UST. As previously described, no existing USTs have been identified within the Project Site by the Soil Investigation Report or the State's GeoTracker.[56] Therefore, the removal of USTs would not pose a significant hazard on groundwater quality. In addition, as previously discussed, the Project Site is not located within a City-designated oil field or oil drilling area.[57,58] Therefore, there are no risks associated with oil wells impacting groundwater quality.

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[56] State of California, GeoTracker, https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=los+angeles, accessed June 10, 2021.

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

[58] California Geologic Energy Management Division, Online Well Finder, http://maps.conservation.ca.gov/doggr/#close, accessed June 10, 2021.

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 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.

***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 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.

**b. Would the project 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 previously discussed, groundwater was encountered at approximately 55 feet below ground surface. While some minimal additional grading would be required as part of the Project, no deep excavations would occur that would extend to the depth at which groundwater was previously encountered on the Project Site. As such, Project construction activities are not anticipated to encounter groundwater and temporary dewatering would not be required. In addition, dewatering during operation would not occur. 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 Report, the Project Site is almost entirely pervious under existing conditions (1 percent impervious). With implementation of the Project, impervious

surfaces would comprise approximately 70 percent of the Project Site.[59] Since infiltration is not considered possible due to the location of the Project Site in a hillside area, the Project would implement a capture and reuse method as required by the City's Low Impact Development Ordinance. As previously discussed, the Project would include the installation of several catch basins that capture the stormwater runoff. Stormwater would be directed into EPIC planters for treatment and storage, and overflow of the EPIC system would be discharged to the existing channel and stormdrain pipe. As provided in the Hydrology and Water Quality Report, the EPIC system would be designed in accordance with the City's Low Impact Development Manual to offset the Project's change in the Project Site's existing pervious conditions. Specifically, Appendix A of the Hydrology and Water Quality Report provides the design calculations of the EPIC system in accordance with the City's requirements and demonstrates that the proposed EPIC system would be adequately sized to hold the required volume of water during a specified rainfall event. 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 decrease 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.

**c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river 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.** There are no streams or rivers within or immediately surrounding the Project Site. Construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also, exposed and stockpiled soils could 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, 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 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.

The Project Site is almost entirely pervious under existing conditions (1 percent impervious). With implementation of the Project, the amount of impervious area would increase to approximately 70 percent. As such, there would be a limited potential for erosion or siltation to occur from exposed

[59] It should be noted that the Hydrology and Water Quality Report, included in Appendix 8 of this Initial Study/MND, conservatively analyzes 74 to 76 percent.

soils or large expanses of pervious areas. In addition, as previously discussed, the Project would include the installation of several catch basins that capture the stormwater runoff. Stormwater would be directed into EPIC planters for treatment and storage, and overflow of the EPIC system would be discharged to the existing channel and stormdrain pipe. 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.

**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. With regard to construction, construction of the Project would include minimal grading. 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, construction activities for the Project would not substantially increase the rate or amount of surface runoff in a manner which 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.

As discussed in the Hydrology and Water Quality Report, the Project Site is almost entirely pervious (approximately 1 percent impervious) under existing conditions. At buildout, the Project Site would result in approximately 70 percent impervious areas.[60] As such, the Project would result in an increase in impervious areas that would increase the amount of surface runoff. Specifically, as summarized in Table 1 and Table 2 of the Hydrology and Water Quality Report, the peak flow rate of the Project Site would increase from 3.60 cubic feet per second to 6.65 cubic feet per second under a 25-year storm event and from 6.66 cubic feet per second to 9.27 cubic feet per second under a 50-year storm event. However, the Project would include the installation of several catch basins that capture stormwater runoff. Stormwater would be directed into EPIC planters for treatment and storage, and overflow of the EPIC system would be discharged to the existing channel and stormdrain pipe. As previously discussed, the EPIC system would be designed in accordance with the City's Low Impact Development Manual to offset the Project's change in the Project Site's existing pervious conditions. Specifically, Appendix A of the Hydrology and Water Quality Report provides the design calculations of the EPIC system in accordance with the City's requirements and demonstrates that the proposed EPIC system would be adequately sized to hold the required volume of water during a specified rainfall event. In addition, surface water runoff from the Project Site would continue to be directed into the City's storm drain system in accordance with regulatory requirements. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would

[60] It should be noted that the Hydrology and Water Quality Report, included in Appendix IS-8 of this Initial Study/MND, conservatively analyzes 74 to 76 percent.

result in on-site or off-site flooding. Operational impacts to hydrology would be less than significant, and no mitigation measures are 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 Report, stormwater runoff from the Project Site currently flows to the southern limits of the Project Site and west at the lower elevated valley, where it is collected in several existing debris basins and routed by channels to the stormdrain system. As discussed above, development of the Project would result in an increase in impervious surfaces, which could potentially increase the amount of surface runoff. However, as required by the Los Angeles County MS4 Permit, the entire post-development Stormwater Quality Design volume must be treated for greater of the first 0.25 inch of 85 percent, 24-hour rain event. Accordingly, the structural and non-structural BMPs for the Project have been designed to treat stormwater runoff from all storms up to and including the 85 percent, 24-hour storm event, which is greater than the required 0.25-inch discharge. Specifically, as summarized in Table 3 of the Hydrology and Water Quality Report, the volume to be treated is 3,489 cubic feet and 3,980 cubic feet within Drainage Areas 1 and 2, respectively. The Project includes the installation of EPIC planters for treatment and storage that would have a storage volume of 3,652 cubic feet for Drainage Area 1 and a storage volume of 4,171 cubic feet for Drainage Area 2. As such, the proposed EPIC planters would include a greater storage volume than required. In addition, as previously discussed, the EPIC system would be designed in accordance with the City's Low Impact Development Manual to offset the Project's change in the Project Site's existing pervious conditions. Specifically, Appendix A of the Hydrology and Water Quality Report provides the design calculations of the EPIC system in accordance with the City's requirements and demonstrates that the proposed EPIC system would be adequately sized to hold the required volume of water during a specified rainfall event. The implementation of BMPs required by the City's LID Ordinance would also 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.

**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.[61,62] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required.

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

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[61] Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1580F, effective September 26, 2008.

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

**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.[63,64] 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.[65] The Project Site is located approximately 6 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.[66] 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.

**e. Would the project 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). The Project Site is located within 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 BMPs) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. Impairments for Ballona Creek include trash, toxic pollutants, bacteria, and metals.

Potential pollutants generated by the Project would be typical of surface parking areas and may 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. 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.

Through 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

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63 Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1580F, effective September 26, 2008.

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

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

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

sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be 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. Would the project physically divide an established community?**

**Less Than Significant Impact.** As discussed in Section 3, Project Description, of this Initial Study/MND, the Project Site currently consists of two unpaved, vacant lots located immediately to the north of the entrance to the Getty Center. Adjacent to the Project Site is the Santa Monica Mountains and the I-405 Freeway to the north, the Getty Center to the south, undeveloped mountainous areas to the west, and the I-405 Freeway to the east. The Project includes the construction of two surface parking lots and ancillary improvements, including a restroom station, a parking ticket machine, and an emergency phone. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose to vacate any surrounding streets adjacent to the Project Site. In addition, the Project does not propose a freeway or other large infrastructure within or surrounding the Project Site that would physically divide the 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.

**b. Would the project 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?**

**Less Than Significant Impact.** Several land use plans, policies, and regulatory documents guide development within the City of Los Angeles, including the City of Los Angeles General Plan (General Plan) and the LAMC, which govern land use through specific development and design standards and building and safety codes. The Brentwood–Pacific Palisades Community Plan (Community Plan) constitutes the local land use policy standard for the Project Site and Community Plan area. Regional plans that are applicable to the Project Site include the SCAG Regional Transportation Plan/Sustainable Communities Strategy, which addresses long-term regional transportation needs throughout its jurisdiction; the Metropolitan Transportation Authority's (Metro) Los Angeles County Congestion Management Program (CMP), which regulates regional traffic issues; and the SCAQMD

AQMP, which addresses attainment of state and federal ambient air quality standards throughout the South Coast Air Basin.

The following discussion addresses the Project's consistency with the requirements and policies of the General Plan Framework Element, Mobility Plan 2035, the Brentwood–Pacific Palisades Community Plan, and the LAMC that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. The Project's consistency with applicable goals, objectives, and policies from the Citywide Urban Design Guidelines is discussed above in Response to Checklist Question I.c.

**City General Plan Framework Element and Mobility Plan 2035**

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City. The following goal, objectives, and policies from the General Plan Framework are applicable to the Project:

- **Policy 3.1.4:** Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4) and Table 3-1.

- **Policy 3.2.3:** Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.

- **Objective 5.9:** Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

- **Policy 5.9.1:** Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.

- **Objective 9.6:** Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.

- **GOAL 9P:** Appropriate lighting required to (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building facade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.

The Project would not conflict with the applicable goal, objectives, and policies. As discussed in Section 3, Project Description, of this Initial Study/MND, the Project Site is designated for Public Facilities and Minimum Residential land uses. The Project Site is zoned by the LAMC as PF-1XL (Public Facilities, Height Zone 1XL) and RE40-1-H (Residential Estate with a minimum lot area of 40,000 square feet, Height Zone 1, Hillside). Land uses permitted or conditionally permitted in the PF zone include museums as a Public Benefit; public parking facilities located under freeway rights-of-way; farming and nurseries under power transmission rights-of-way; fire stations and police

stations; government buildings, structures, offices and service facilities; public libraries not located inside public parks; post offices and related facilities; public health facilities; and public elementary and secondary schools. Land uses permitted or conditionally permitted in the RE zone include single-family dwellings; museums as a Public Benefit; public elementary and secondary schools; parks, playgrounds, or community centers; truck gardening and the keeping of equines, poultry, rabbits, and chinchillas in conjunction with the residential use of a lot; accessory buildings, including private garages, accessory living quarters, servant's quarters, recreation rooms, or private stables; and backyard beekeeping as an accessory use. Based on the existing land use and zoning designations, the proposed surface parking areas, which would be part of the existing Getty Center (a museum), would be consistent with the uses permitted on the Project Site as a Public Benefit.

The Project would also introduce new lighting within the Project Site for safety, security and visibility, including along the perimeter of the Project Site and in the center of the surface parking areas. Other Project security features include security cameras throughout the Project Site, and blue light emergency stations that would be monitored by Getty Center Security Control Room. The Getty's front gate on Sepulveda Boulevard would continue to restrict access to the Getty Center when the facility is closed, which includes access to the Project Site. The Project would also include a setback from the I-405 Freeway right-of-way varying from approximately 2 feet to 9 feet that would be landscaped with a broad palette of native and drought-tolerant plantings. A limited amount of new native and drought-tolerant plantings would also be installed immediately adjacent to some portions of the western edge of the Project Site.

The Project also would not conflict with the City's objective to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality. In particular, the Project would include a network of bioswales that would be installed to minimize erosion and stormwater runoff, which will effectively filter rainwater before releasing it to the storm drain (or back into the ground). The Project will also include the use of native/adapted plant species and the installation of planters to capture and reuse stormwater.

Regarding Mobility Plan 2035, the Project would not conflict with applicable Policy 3.8 to provide bicyclists with convenient, secure and well-maintained bicycle parking facilities. The Getty provides bicycle parking facilities near the main parking structure and entrance to the Getty Center Tram. In addition, as previously discussed above, the Project is designed to supplement the Getty's ongoing efforts to improve traffic flow in and out of the Getty Center and alleviate congestion on Sepulveda Boulevard. These efforts have included providing incentives for staff to use alternative modes of transportation including carpools, vanpools, public transit, and bicycling.

### Brentwood–Pacific Palisades Community Plan

The Brentwood–Pacific Palisades Community Plan is intended to promote an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the community. The Community Plan is also intended to guide development in order to create a healthful and pleasant environment. Goals, objectives, policies and programs are created to meet the existing and future needs and desires of the community. The following goal, objective, and policies provided in the Brentwood–Pacific Palisades Community Plan are applicable to the Project:

- **Policy 1-6.1:** Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.

- **Goal 11:** Encourage alternative modes of transportation to the use of single occupancy vehicles (SOV) in order to reduce vehicle trips.

- **Objective 11-1:** To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length and reduce the number of vehicle trips.

- **Policy 13-1.2:** New development projects shall be designed to minimize disturbance to existing traffic flow with proper ingress and egress to parking.

- **Policy 15-1.1:** Consolidate parking where appropriate, to minimize the number of ingress and egress points onto arterials

As described in Section 3, Project Description, of this Initial Study/MND, the Project includes two new landscaped surface parking areas on two existing, graded areas and associated ancillary improvements located adjacent to the I-405 Freeway and immediately north of the primary visitor entrance to the Getty Center. The area for surface parking totals approximately 3.06 acres and was previously graded and used by Caltrans for construction-related activities in connection with the I-405 Freeway Sepulveda Pass Widening Project. As such, the Project would be limited to the development of surface parking areas within an area previously disturbed and which is already connected to the existing street system. The Project would also encourage alternative modes of transportation by accommodating parking for alternative vehicles, including up to nine buses for large groups of visitors. Additionally, the proposed parking lots would not require new ingress and egress points from the Getty Center onto arterials, and access would be accommodated within the Getty Center property from Getty Center Drive. The Project would supplement the existing parking supply at the Getty Center and would not involve the development of new trip generating uses. Specifically, as discussed in Section 3, Project Description, of this Initial Study/MND, the proposed parking areas would be primarily used by Getty Center vendors and staff to help maintain available parking in the Getty's main parking structure for visitors on peak days (which primarily occur over the winter holidays and summer break). This additional capacity will help reduce queuing on Sepulveda Boulevard by enabling vehicles to get into the Getty Center campus faster, and disbursed into either the main parking structure or the Oak Parking Lots. In addition, the new Oak Parking Lots would be available to provide onsite parking for up to nine additional buses, in addition to the 14 buses that can already be accommodated onsite. Additional bus parking helps to ensure that buses will not leave the Getty Center property after dropping off their passengers, which will prevent buses from traveling back out onto Sepulveda or into residential neighborhoods. Accordingly, the Project would help alleviate congestion on the circulation system during peak visitor days at the Getty Center by increasing capacity for visitors in the Getty Center's main parking structure, thereby allowing vehicles to park expeditiously once they enter the Getty Center property and reducing queue lengths onto Sepulveda Boulevard.

### City of Los Angeles Municipal Code

As discussed in Section 3, Project Description, of this Initial Study/MND, the Project Site is designated for Public Facilities and Minimum Residential land uses. The Project Site is zoned by the LAMC as PF-1XL (Public Facilities, Height Zone 1XL) and RE40-1-H (Residential Estate with a minimum lot

area of 40,000 square feet, Height Zone 1, Hillside). Land uses permitted or conditionally permitted in the PF zone include museums as a Public Benefit; public parking facilities located under freeway rights-of-way; farming and nurseries under power transmission rights-of-way; fire stations and police stations; government buildings, structures, offices and service facilities; public libraries not located inside public parks; post offices and related facilities; public health facilities; and public elementary and secondary schools. Land uses permitted or conditionally permitted in the RE zone include single-family dwellings; museums as a Public Benefit; public elementary and secondary schools; parks, playgrounds, or community centers; truck gardening and the keeping of equines, poultry, rabbits, and chinchillas in conjunction with the residential use of a lot; accessory buildings, including private garages, accessory living quarters, servant's quarters, recreation rooms, or private stables; and backyard beekeeping as an accessory use. Based on the existing land use and zoning designations, the proposed surface parking areas, which would be part of the existing Getty Center (a museum), would be consistent with the uses permitted on the Project Site as a Public Benefit.

**Regional Plans**

The Project Site is located within the SCAG planning area. SCAG is a joint-powers agency made up of 14 subregions covering six counties. The Project Site is located within the City of Los Angeles subregion. SCAG's 2016–2040 RTP/SCS,[67] presents a long-term transportation vision through the year 2035 for the SCAG region. The 2016–2040 RTP/SCS provides a basic policy and program framework for long-term investment in the regional transportation system in a coordinated, cooperative, and continuous manner. The 2016–2040 RTP/SCS emphasizes sustainability and integrated planning and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. SCAG's 2020–2045 RTP/SCS, core vision is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. SCAG's 2020–2045 RTP/SCS includes new initiatives at the intersection of land use, transportation, and technology to reach the region's GHG reduction goals. The 2020-2045 RTP/SCS goals that relate to the Project include: (1) improve mobility, accessibility, reliability, and travel safety for people and goods; (2) enhance the preservation, security, and resilience of the regional transportation system; and (3) increase person and goods movement and travel choices within the transportation system. The Project would be consistent with these goals by expanding the Getty Center's available on-site parking facilities, which would improve circulation and access at the Getty Center. The proposed parking areas would not require new ingress and egress points from the Getty Center onto arterials, and access would be accommodated within the Getty Center property from Getty Center Drive. The Project would supplement the existing parking supply at the Getty Center and would not involve the development of new trip generating uses. Accordingly, the Project would help alleviate congestion on the circulation system during peak visitor days at the Getty Center by increasing capacity for visitors in the Getty Center's main parking structure, thereby allowing vehicles to park expeditiously once they enter the Getty Center property and reducing queue lengths onto Sepulveda Boulevard.

[67] The Regional Council of SCAG formally adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy September 2020. However, the 2020–2045 RTP/SCS has not been formally adopted by the California Air Resources Board. It is noted that the goals of the 2020–2045 RTP/SCS and their general intent are similar to the goals that were included in SCAG's 2016–2040 RTP/SCS. As such, SCAG's latest goals in the 2020–2045 RTP/SCS are discussed herein.

**Conclusion**

Based on the above, the Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant, and no mitigation measures are required.

# 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. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** No mineral extraction operations currently occur on the Project Site. In addition, 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.[68,69] The Project Site is also not located within a City-designated oil field or oil drilling area.[70] As such, the potential for mineral resources to be found on the Project Site is low. 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.

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

**No Impact.** No mineral extraction operations currently occur on the Project Site. In addition, 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.[71,72,73] The Project Site is also not located within a City-designated oil field or oil

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

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

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

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

drilling area.[74,75] As such, the potential for mineral resources to be found on the Project Site is low. 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.

# 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? | ☐ | ☐ | ☒ | ☐ |
| 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. Would the project result in 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?**

**Less Than Significant Impact.** The following analysis evaluates the potential noise impacts at noise-sensitive land uses resulting from construction and operation of the Project.

**Applicable Noise Regulations**

Chapter XI, *Noise Regulation* (hereafter referred to as the Noise Regulation), of the LAMC, establishes regulations regarding allowable increases in noise levels. These regulations address activities associated with construction and operation of the Project.

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

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

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

75 California Geologic Energy Management Division, Online Well Finder, http://maps.conservation.ca.gov/doggr/#close, accessed June 10, 2021.

The Noise Regulation establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment, amplified sound, and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulation, a noise level increase of 5 dBA over the existing ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5-dBA allowance (for a total of 10 dBA[76] above the existing ambient noise level) for noise sources occurring for more than five but less than 15 minutes in any 1-hour period, and an additional 5-dBA allowance (for a total of 15 dBA above the existing ambient noise level) for noise sources occurring for five minutes or less in any 1-hour period.[77] This standard applies to all noise sources, with the exception of vehicles traveling on public streets and construction noise.

Ambient noise is defined by the Noise Regulation as the measured noise level averaged over a period of at least 15 minutes. For purposes of determining whether or not a violation of the noise regulation is occurring, the sound level measurements of the additional noise source are averaged over a minimum 15-minute duration and compared with the baseline ambient noise levels (i.e., without the additional noise source). The ambient noise baseline to be used is either the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is unknown, the City's presumed ambient noise level is used as the baseline. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels for residential zones are 50 dBA and 40 dBA, respectively.[78] In addition, the City's presumed daytime and nighttime minimum ambient noise levels for commercial zones are 60 dBA and 55 dBA, respectively.

Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, on Saturday before 8:00 A.M. and after 6:00 P.M., and at any time on Sunday or a national holiday.[79] The City's Noise Regulation (Section 112.05 of the LAMC) further limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA (between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.[80]

Noise due to motor driven vehicles on private property (e.g., parking lot) is regulated under Section 114.02 of the LAMC. In accordance with Section 114.02, operation of motor driven vehicles upon any property within the City, which cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA is considered a noise violation.

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76 A-weighted decibels, abbreviated dBA, are an expression of the relative loudness of sounds in air as perceived by the human ear.

77 Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

78 Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.

79 Los Angeles Municipal Code, Section 41.40.

80 In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05, "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

Noise due to vehicle theft alarm systems (car alarms) is regulated under Section 114.06 of the LAMC. The noise regulation states that "it shall be unlawful for any person to install, operate or use any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes."

### Existing Noise Environment

Two receptor locations were selected to represent the nearest noise sensitive uses (i.e., an institutional land use with a school and residential uses) to the Project Site. These noise sensitive receptors include the Leo Baeck Temple located on the east side of Sepulveda Boulevard (approximately 820 feet) southeast of the Project Site) and the single-family residence on the west side of Casiano Road (approximately 1,000 feet southeast of the Project Site). In addition, the ambient noise level was also measured along Sepulveda Boulevard (anticipated truck route), approximately 3,000 feet south of Getty Center Drive. The ambient noise levels were measured on February 18, 2020, using a Quest Technologies Model 2900 Sound Level Meter. A 15-minute ambient measurement was conducted at each of the receptor location between 10:00 A.M. and 12:00 P.M. The ambient noise measurements were taken in accordance with the City's standards, which require ambient noise to be measured over a period of 15 minutes.[81]

The measured existing ambient noise levels at the Leo Baeck Temple and the residence on Casiano Road were 75.5 dBA ($L_{eq}$) and 68.5 dBA ($L_{eq}$), respectively. The measured ambient noise level along Sepulveda Boulevard (south of Getty Center Drive) was 73.4 dBA ($L_{eq}$). Based on field observation, the existing ambient noise levels were controlled primarily by auto traffic on I-405 Freeway and Sepulveda Boulevard. The measured existing ambient noise environment at the off-site sensitive receptors currently exceed the City's presumed daytime ambient noise standard of 50 dBA ($L_{eq}$) for residential zones. Therefore, consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

### Construction Noise

Project construction is anticipated to span six months and be completed by the end of 2022. Construction activities would include site preparation, grading/excavation, paving/landscaping, and building construction for the surface parking areas, restroom station, landscaping, and ancillary surface parking area lighting. Noise would be generated by vehicles and equipment during various stages of construction activities including: site preparation, grading/excavation, paving/landscaping, and building construction. Noise from construction activities would range from approximately 82 to 86 dBA ($L_{eq}$) at a distance of 50 from the construction site.[82] The Leo Baeck Temple would be shielded from construction activities by the elevated I-405 Freeway. Table 7 on page 103 presents the estimated on-site construction noise levels at the nearest off-site sensitive receptors, based on the anticipated construction equipment mix, distance attenuation and intervening structure (i.e., the I-405 Freeway). As indicated in Table 7, the on-site construction-related noise levels associated with the Project are estimated up to 51.4 dBA ($L_{eq}$) and 59.6 dBA ($L_{eq}$) at the Leo Baeck Temple and at the

[81] City of Los Angeles, LAMC Section 111.01.

[82] City of Los Angeles, L.A. CEQA Thresholds Guide, Exhibit I.1-2, 2006.

**Table 7**
**On-Site Construction Noise Impacts**

| Receptor[a] | Existing Ambient Noise Levels, dBA ($L_{eq}$) | Estimated Project Construction Noise Levels, dBA ($L_{eq}$) | Significance Threshold,[b] dBA ($L_{eq}$) | Significant Impact? |
|---|---|---|---|---|
| Leo Baeck Temple | 75.5 | 51.4 | 80.5 | No |
| Residence on west side Casiano Road. | 68.5 | 59.6 | 73.5 | No |

[a] *Representative noise sensitive receptors nearest to the Project Site.*

[b] *Significance threshold is based on the L.A. CEQA Thresholds Guide for construction activities lasting longer than 10 days in a three-month period, as not to exceed the ambient by 5 dBA.*

*Source: AES, 2020.*

nearest off-site residential use, respectively. The estimated noise levels due to the on-site construction activities at the off-site sensitive receptors are well below the measured ambient noise levels of 75.5 dBA (at the Leo Baeck Temple) and 68.5 dBA (at the residence on Casiano Road).

In addition to the on-site construction equipment, the Project would also include construction trucks (haul and material delivery trucks) and worker vehicles. As described in the Project Description, haul trucks to and from the Project Site would travel through the Caltrans southbound I-405 Freeway shoulder, which would avoid the use of Sepulveda Boulevard or other City streets. Material delivery trucks would access the Project Site via Sepulveda Boulevard north or south of Getty Center Drive. The Project would include up to 20 delivery trucks and 20 worker trips per day during the paving/landscaping phase. Noise levels due to construction trucks are estimated to be up to 59.7 dBA ($L_{eq}$) along Sepulveda Boulevard, which would be below the existing ambient noise levels of 73.4 dBA, as measured along Sepulveda Boulevard.

Based on the above, the estimated construction-related noise from both on-site and off-site construction noise sources would be below the existing ambient noise levels and would not generate noise levels greater than 5 dBA at the nearest off-site noise sensitive uses. Furthermore, construction activities would occur during the allowable time periods specified in the LAMC. Therefore, noise impacts associated with Project construction would be less than significant, and no mitigation measures are required.

### Operation Noise

As discussed in Section 3, Project Description, of this Initial Study/MND, the Project would provide approximately 217 parking spaces within the Oak Parking Lot A (106 spaces) and Oak Parking Lot B (111 spaces). Sources of noise within the parking areas would primarily include vehicular movements, engine noise, and doors opening and closing. Noise levels associated with the parking operations would be effectively attenuated at the Leo Baeck Temple and nearest residential uses by distance and the intervening I-405 Freeway and would be below the City's noise standard of a 5 dBA

increase over the existing ambient noise level. Per the Federal Transit Administration (FTA), a park and ride lot would generate noise level of approximately 65.1 dBA ($L_{eq}$) at a distance of 50 feet.[83] Table 8 on page 105 presents the estimated parking operation noise levels at the nearest off-site noise sensitive receptors, based on distance attenuation and intervening I-405 Freeway. As indicated in Table 8, the estimated noise levels from the Project parking areas to the Leo Baeck Temple and the residence at Casiano Road would be 31.1 dBA ($L_{eq}$) and 39.4 dBA ($L_{eq}$), respectively. The estimated noise levels from the Project parking operation would be well below the existing ambient noise levels, as well as the Project significance thresholds (5-dBA over the ambient). Therefore, noise impacts associated with operation of the proposed parking facilities would be less than significant, and no mitigation measures are required.

**b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant Impact.** Heavy construction equipment (e.g., a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction site, i.e., within 15 feet as related to building damage and 80 feet as related to human annoyance at residential uses. The nearest off-site sensitive uses include the Leo Baeck Temple and the residential uses to the southeast. These uses are located approximately 820 feet and 1,000 feet from the construction site, respectively. Heavy construction equipment (e.g., large bulldozer) would generate vibration levels of up to 87 VdB.[84] Based on distance attenuation, the vibration levels at the Leo Baeck Temple and the nearest residential use are estimated to be 42 VdB and 39 VdB, respectively. The estimated vibration levels due to construction equipment will be well below the FTA vibration criteria of 75 VdB (applicable to the Leo Baeck Temple) and 72 VdB (applicable to residential use).[85] As such, vibration impacts associated with the Project would be less than significant, and no mitigation measures are required.

**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, the Santa Monica Airport, is located approximately 5 miles from the Project Site. Given the distance between the Project Site and the Santa Monica Airport, the Project would not have the potential to expose people working or residing in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required.

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83 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 4-13, 2018. Reference noise level for a park and ride lot with 12 buses and 1,000 cars (peak activity hour). The noise analysis is conservative, as Project parking areas provides for up to 10 buses and 160 cars.

84 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 7-4, 2018.

85 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-3, 2018.

**Table 8**
**Estimated Noise Levels from Parking Operations**

| Receptor[a] | Existing Ambient Noise Levels, dBA ($L_{eq}$) | Estimated Noise Levels from Project Parking Operations, dBA ($L_{eq}$) | Ambient + Project Parking Noise Levels, dBA ($L_{eq}$) | Significance Threshold,[b] dBA ($L_{eq}$) | Significant Impact? |
|---|---|---|---|---|---|
| Leo Baeck Temple | 75.5 | 31.1 | 75.5 | 80.5 | No |
| Residence on west side Casiano Road. | 68.5 | 39.4 | 68.5 | 73.5 | No |

[a] *Representative noise sensitive receptors nearest to the Project Site.*

[b] *Significance threshold is based on City's Municipal Code Section 114.02, as not to exceed the ambient noise level by more than five (5) decibels.*

*Source: AES, 2022.*

# 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. Would the project 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.** As discussed in Section 3, Project Description, of this Initial Study/MND, the Project would create new landscaped surface parking areas on two existing, graded areas adjacent to the I-405 Freeway. The surface parking areas would be used by the Getty Center. As the Project does not include a residential component, it would not directly generate a new residential population which would induce population growth in the vicinity of the Project Site and the Brentwood–Pacific Palisades Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain

at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. In particular, up to 10 construction workers could be required during any phase of construction. In addition, Project construction is anticipated to span only six months. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could induce substantial population growth.

With regards to operation, the Project would not introduce new residential or commercial uses since the Project calls for the development of surface parking areas. In addition, given the proposed uses, it is unlikely that the Project would generate a substantial increase in employment opportunities that would induce substantial population growth. Specifically, it is anticipated that the Getty Center would use current staff to manage operations of the two new surface parking areas, as needed.

Based on the above, the Project would not induce substantial unplanned population or housing growth. Impacts would be less than significant, and no mitigation measures are required.

**b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** As previously discussed, the Project Site currently consists of two graded areas. No housing exists on the Project Site. As such, the Project would not displace any existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, no impacts would occur, and no mitigation measures are required.

## 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. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?**

**Less Than Significant Impact.** Fire protection and emergency medical services for the Project Site is provided by the City of Los Angeles Fire Department (LAFD). As discussed in Section 3, Project Description, of this Initial Study/MND, the Project would create two new landscaped surface parking areas on two existing, graded areas with ancillary improvements, including a restroom station, light poles, and an emergency phone located adjacent to the I-405 Freeway. The proposed surface parking areas would be used by the Getty Center and the Project would not include the construction of uses that would generate a substantial increased demand for fire protection services. Specifically, as the Project does not include a residential component, it would not directly generate a new residential population within the Project Site that could increase the demand for fire protection services to the Project Site. In addition, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could generate a demand for fire protection services. In addition, as described in Section 3, Project Description, of this Initial Study/MND, the Project is designed to reduce wildfire related threats in the Santa Monica Mountains in several ways. First, the Project provides increased access in the Sepulveda Pass area for LAFD and other emergency responders. As part of the I-405 Freeway Sepulveda Pass Widening Project, Caltrans widened the access road to the Project Site to 24 feet so that it can accommodate fire trucks and emergency access. The Project involves extending water conveyance infrastructure under this access road into the Project Site, where fire hydrants will be installed to enable LAFD to use the parking lot areas to help protect the surrounding communities from fire danger in the event of a wildfire. The Getty will also make the new parking areas available to LAFD and other emergency responders as a staging area in the event of an emergency, like other areas on the Getty Center property. In addition, the Getty will install drought tolerant landscaping and irrigation on the Project Site, which will help reduce the risk of fire in and around the parking areas. Moreover, 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. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Therefore, impacts regarding fire protection services would be less than significant, and no mitigation measures are required.

**b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered**

**governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?**

**Less Than Significant Impact.** Police protection for the Project Site is provided by the City of Los Angeles Police Department (LAPD). As discussed above, the Project would include the development of two new landscaped surface parking areas and ancillary improvements. The Project would not include the construction of uses that would generate a substantial increased demand for police protection services. Specifically, as the Project does not include a residential component, it would not directly generate a new residential population within the Project Site that could increase the demand for police protection services to the Project Site. In addition, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could generate a demand for police protection services. In addition, as part of the Project, existing Getty Center security features would be extended to the Project Site, including security cameras throughout the Project Site and blue light emergency stations that would be monitored by Getty Center Security Control Room. The surface parking areas would also be patrolled regularly by the Getty Center's comprehensive security staff. The Getty's front gate on Sepulveda would continue to restrict access to the Getty Center when the facility is closed, which includes access to the Project Site. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. Therefore, impacts regarding police protection services would be less than significant, and no mitigation measures are required.

**c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for 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.[86] The Project Site is located in Local District–West.[87] The Project Site is currently served by one elementary school (Kenter Canyon Elementary Charter), one middle school (Paul Revere Charter Middle School), and one high school (Palisades Charter High School).[88] As previously discussed, the Project would construct two new landscaped surface parking areas and ancillary improvements. The Project does

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86 Los Angeles Unified School District, Board of Education Districts Maps 2015-2016, http://achieve.lausd.net/Page/8652, accessed June 10, 2021.

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

88 Los Angeles Unified School District, Residential School Identifier, http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed June 10, 2021.

not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population.

In addition, it is anticipated that the Getty Center would use current staff to manage operations of the two new surface parking areas, as needed. As such, to the extent existing employees reside in the vicinity of the Project Site, such employees are already generating a demand for schools that serve the Project Site. In addition, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could generate a demand for schools.

Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Impacts would be less than significant, and no mitigation measures are required.

**d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?**

**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 (LADRP). Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include the Crestwood Hills Recreation Center located approximately 1.10 miles southwest of the Project Site, the Barrington Recreation Center located approximately 1.89 miles south of the Project Site, and the Veterans' Barrington Park located approximately 1.89 miles south of the Project Site.

As discussed in Section 3, Project Description, of this Initial Study/MND, the Project would construct two new landscaped surface parking areas and ancillary improvements. The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would generate a demand for parks and/or recreational facilities in the vicinity of the Project Site. Additionally, it is anticipated that the Getty Center would use current staff to manage operations of the two new surface parking areas, as needed. As such, to the extent existing employees reside in the vicinity of the Project Site, such employees are already generating a demand for parks that serve the Project Site. In addition, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be

generated during construction of the Project which could generate a demand for parks. Therefore, no substantial use of parks by employees associated with the Project is anticipated. Overall, 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.

**e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for 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.[89] The Project area is served by existing libraries within the Brentwood–Pacific Palisades Community Plan area, including the Donald Bruce Kauffman Brentwood Branch Library located approximately 3.1 miles south of the Project Site and the Palisades Branch Library located approximately 7.1 miles southwest of the Project Site.

As discussed above, the Project would include the development of two surface parking areas. The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the Donald Bruce Kauffman Branch Library and the Palisades Branch Library. In addition, it is anticipated that the Getty Center would use current staff to manage operations of the two new surface parking areas, as needed. As such, to the extent existing employees reside in the vicinity of the Project Site, such employees are already generating a demand at the libraries that serve the Project Site. In addition, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could generate a demand for library services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities. Impacts would be less than significant, and no mitigation measures are required.

[89] 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.** As described above in Response to Checklist Question XV.d, nearby public parks and recreational facilities located in the vicinity of the Project Site include the Crestwood Hills Recreation Center located approximately 1.10 miles southwest of the Project Site, the Barrington Recreation Center located approximately 1.89 miles south of the Project Site, and the Veterans' Barrington Park located approximately 1.89 miles south of the Project Site. As previously discussed, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, it is anticipated that the Getty Center would use current staff to manage operations of the two new surface parking areas, as needed. As such, to the extent existing employees reside in the vicinity of the Project Site, such employees are already generating a demand for parks and recreational facilities that serve the Project Site. In addition, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could generate a demand for parks or recreational facilities. Therefore, no substantial demand for parks and recreational facilities from employees is anticipated.

Based on the above, the Project would not increase the use of existing neighborhood and regional parks or other 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.

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

**No Impact.** The Project would not include the construction of recreational facilities or require the expansion of recreational facilities, as discussed above in Response Checklist Question XV.d. Thus, no impact would occur, and no mitigation measures are 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 or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |

The following analysis is based on the Traffic Assessment for the Oak Parking Improvement Project (Traffic Assessment) prepared for the Project by Linscott, Law & Greenspan, Engineers, dated March 3, 2020. The Traffic Assessment is included as Appendix IS-9 of this Initial Study/MND.

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

**Less Than Significant Impact.** As discussed in the Traffic Assessment prepared for the Project, in conjunction with the adoption of VMT in July 2019, LADOT issued revised Transportation Assessment Guidelines as well as a VMT "Calculator" tool. With regard to this threshold question, the Transportation Assessment Guidelines identifies several key City plans and policies that should be reviewed when preparing a transportation assessment. The Transportation Assessment Guidelines also includes an initial review process to determine if a proposed project would require the preparation of a transportation assessment. As concluded in the Traffic Assessment, the Project does not qualify as a project that would require a transportation assessment per the City's Transportation Assessment Guidelines because the Project would not generate vehicle trips. As such, the key City plans and policies identified in the City's Transportation Assessment Guidelines for review were not formally considered in a transportation assessment as no such analysis was required. Notwithstanding, this Initial Study/MND includes an evaluation of the applicable City plans and policies identified in the Transportation Assessment Guidelines.

The City plans and policies identified in the City's Transportation Assessment Guidelines include Mobility Plan 2035; Plan for a Healthy Los Angeles; Specific Plans; LAMC Section 12.21.A.16 (bicycle

parking); LAMC Section 12.26J (TDM Ordinance); Vision Zero Action Plan; Vision Zero Corridor Plans; Streetscape Plans; and Citywide Design Guidelines Guideline 1 (safe pedestrian experience), Guideline 2 (vehicular access), and Guideline 3 (project design). As provided in the Transportation Assessment Guidelines, the overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. In general, transportation policies or standards adopted to protect the environment are those that support multi modal transportation options and a reduction in VMT. Conversely, a project would not be shown to result in an impact merely based on whether a project would not implement a particular program, plan, policy, or ordinance. Many of these programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans and policies.

Of the City plans and policies identified in the City's Transportation Assessment Guidelines, the plans applicable to the Project and which are considered herein are the Mobility Plan 2035 and the Citywide Design Guidelines. Also included herein is a summary of the circulation and parking analysis included in the Traffic Assessment prepared for the Project, which addresses the circulation system.

**Mobility Plan 2035**

The Mobility Plan 2035 combines "complete street" principles with five goals that define the City's primary mobility priorities: (1) Safety First; (2) World-Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environmental & Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals. The following policies from Mobility Plan 2035 are applicable to the Project:

- **Policy 1.1 Roadway User Vulnerability:** Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.

  **No Conflict.** As previously discussed, the Project Site is intended for vehicular access only; therefore, pedestrian access to and from the Project Site would not be available. Specifically, once visitors have parked their vehicles, a Getty-operated shuttle would transport those visitors either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). Shuttle service also would be provided to return visitors to their cars in the new parking areas. The Project would be designed to promote a safe, comfortable and accessible pedestrian experience with landscaping and amenities.

- **Policy 2.6 Bicycle Networks:** Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.

  **No Conflict.** The Project Site is intended for vehicular access only, and therefore bicyclists would continue to access the Getty's bicycle parking facilities from Getty Center Drive adjacent to the existing parking structure. The Project is designed to supplement the Getty's ongoing efforts to improve traffic flow in and out of the Getty Center and alleviate congestion on Sepulveda Boulevard. These efforts have included providing incentives for staff to use alternative modes of transportation including carpools, vanpools, public transit, and bicycling.

- **Policy 2.10 Loading Areas:** Facilitate the provision of adequate on and off- street loading areas.

  **No Conflict.** The Project would provide dedicated passenger loading areas to the Getty Center from the proposed parking areas. Specifically, once visitors have parked their vehicles, a Getty-operated shuttle would transport those visitors either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). Shuttle service also would be provided to return visitors to their cars in the new parking areas.

- **Policy 3.1 Access for All:** Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.

  **No Conflict.** As previously discussed, the Project Site is intended for vehicular access only; therefore, pedestrian and bicycle access to and from the Project Site would not be available. Bicyclists would continue to access the Getty's bicycle parking facilities from Getty Center Drive adjacent to the existing parking structure. The Project would support those employees and visitors who choose to travel by bus or automobile. Specifically, the Project would build upon existing traffic improvement efforts (e.g., transportation demand management program; alternative work schedules for staff; automated parking system; additional access points; and designated turn-around location for shuttles, taxis, rideshare vehicles, and visitors) by providing additional parking capacity at the Getty Center. The Oak Parking A Lot (South) and Oak Parking Lot B (North) areas would be primarily used by Getty Center vendors and staff to help maintain available parking in the Getty's main parking structure for visitors on peak days (which primarily occur over the winter holidays and summer break). Accordingly, this additional capacity will help reduce queuing on Sepulveda Boulevard by enabling vehicles to get into the Getty Center campus faster, and disbursed into either the main parking structure or the Oak Parking Lots. In addition, the new Oak Parking Lots would support the use of buses as the parking areas would be available to provide onsite parking for up to nine additional buses, in addition to the 14 buses that can already be accommodated onsite. Additional bus parking helps to ensure that buses will not leave the Getty Center property after dropping off their passengers, which will prevent buses from traveling back out onto Sepulveda or into nearby residential neighborhoods.

- **Policy 3.8 Bicycle Parking:** Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.

  **No Conflict.** The Project Site is intended for vehicular access only, and therefore bicyclists would continue to access the Getty's bicycle parking facilities from Getty Center Drive adjacent to the existing parking structure.

- **Policy 4.13 Parking and Land Use Management:** Balance on-street and off-street parking supply with other transportation and land use objectives.

  **No Conflict.** As previously discussed, the Project would build upon existing traffic improvement efforts by providing additional parking capacity at the Getty Center. The Oak Parking A Lot (South) and Oak Parking Lot B (North) areas would be primarily used by Getty Center vendors and staff to help maintain available parking in the Getty's main parking structure for visitors on peak days (which primarily occur over the winter holidays and summer break). Accordingly, this additional capacity will help reduce queuing on

Sepulveda Boulevard by enabling vehicles to get into the Getty Center campus faster, and disbursed into either the main parking structure or the Oak Parking Lots. In addition, the new Oak Parking Lots would be available to provide onsite parking for up to nine additional buses, in addition to the 14 buses that can already be accommodated onsite. Additional bus parking helps to ensure that buses will not leave the Getty Center property after dropping off their passengers, which will prevent buses from traveling back out onto Sepulveda or into nearby residential neighborhoods.

Based on the above, the Project would not conflict with the goals and applicable policies of the City's Mobility Plan 2035.

**Citywide Urban Design Guidelines**

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. As discussed below, the Project would not conflict with the applicable Citywide Design Guidelines Guideline 1, Guideline 2, and Guideline 3 identified in the City's Transportation Assessment Guidelines.

Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all

Pedestrian access to and from the Project Site would not be available. Specifically, once visitors have parked their vehicles in Oak Parking Lot A (South) or Oak Parking Lot B (North), a Getty-operated shuttle would transport those visitors either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). Shuttle service also would be provided to return visitors to their cars in the new parking areas. The Project would be designed to promote a safe, comfortable, and accessible pedestrian experience with landscaping and amenities. Specifically, the Project would be landscaped with a broad palette of native and drought-tolerant plantings. In addition, Oak Parking Lot A (South) would include a restroom, bench, water fountain, and trash receptacles in the area where the shuttle will pick up passengers. The area would be shaded with a cantilevered canopy extending out from the restroom structure and a large oak tree. Similarly, the Oak Parking Lot B (North) would include a bench, water fountain, and trash receptacles and a large oak tree for shade in the area where the shuttle will pick up passengers.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience

As previously discussed, the Project Site is intended for vehicular access only; therefore, pedestrian access to and from the Project Site would not be available. Specifically, once visitors have parked their vehicles, a Getty-operated shuttle would transport those visitors either to the Getty Center Tram station next to the main parking structure or directly to the Getty Center (top of the hill). Shuttle service also would be provided to return visitors to their cars in the new parking areas. The Project would be designed to promote a safe, comfortable and accessible pedestrian experience with landscaping and amenities. Therefore, the pedestrian experience would not be degraded with implementation of the Project.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale

The Project would include a setback from the I-405 Freeway right-of-way varying from approximately 2 feet to 9 feet that would be landscaped with a broad palette of native and drought-tolerant plantings, thereby minimizing the appearance of the proposed surface parking. In addition, the existing 8-foot concrete barrier with mesh fencing separating the Project Site from the I-405 Freeway would remain. Within the Project Site, the Project would maintain a human scale through the inclusion of landscaping, a restroom (in Oak Parking Lot A), benches, water fountains and trash receptacles.

**Analysis of Circulation System Surrounding the Project Site**

As previously discussed, the Project involves the construction of two new landscaped surface parking areas within the Project Site for use by the Getty Center. The Project would not involve the development of new land uses which would directly create new or additional vehicular trips to the Project Site. In addition, the Project would not modify existing transit, bicycle, or pedestrian access or affect such facilities. As detailed in the Traffic Assessment and summarized below, the Project would also address two primary existing issues related to traffic and parking at the Getty Center. As identified in the Traffic Assessment, these two traffic and parking issues include vehicle queuing on Sepulveda Boulevard and insufficient bus parking on-site.

With regard to vehicle queuing on Sepulveda Boulevard, during periods of peak visitation at the Getty Center, queues of vehicle traffic occasionally extend from Getty Center Drive onto Sepulveda Boulevard under existing conditions. This occurs when parking in the main parking structure is used to capacity. This causes Getty Center security to require inbound vehicles on Getty Center Drive to turn around and exit the property. Some vehicles can be directed to use an available off-site parking resource, such as the Leo Baeck Temple located on the east side of Sepulveda Boulevard if it is available. However, when the main parking structure is filled to capacity and off-site parking resources are full or not available, Getty Center staff advises arriving visitors to return at another time.[90] The process of stopping vehicles, disseminating information regarding the parking situation, and safely exiting vehicles from Getty Center Drive causes vehicles to queue on Sepulveda Boulevard in both directions Visitors who are turned away often return later in the day in the hope that on-site parking has become available, resulting in individual vehicles making multiple trips on Sepulveda Boulevard (this primarily occurs with out-of-town visitors who may have a limited opportunity to visit the Getty Center).

The Project would provide approximately 217 additional parking spaces for use by Getty Center staff, contractors, visitors, and buses. Staff and visitors who utilize the Oak Parking Lots would be transported via a Getty-operated shuttle to the Getty Center Tram station or directly to the Getty Center (top-of-hill). Sheltered shuttle bus stops would be provided within the Oak Parking Lots. Due to the grades of the road between the Oak Parking Lots and Getty Center Drive, as well as the limited available width between the existing retaining walls and I-405 Freeway, there are no sidewalks on the Oak Parking Road and pedestrian traffic would be prohibited through signage on the Oak Parking

[90] As of October 5, 2019, the Getty Center identified 19 days in 2019 where staff advised arriving visitors to return at another time because parking was not available on-site or at a nearby off-site resource.

Road. As discussed in the Traffic Assessment, it is anticipated that with the addition of the Project's proposed 217 parking spaces, the need to turn away visitors during periods of high parking demand would be substantially reduced. The Project, in conjunction with the other transportation improvements to be implemented at the Getty Center as described herein, would nearly eliminate instances of vehicle queuing on Getty Center Drive onto Sepulveda Boulevard, resulting in substantially improved operational and safety conditions for all travelers.

As it relates to insufficient bus parking on-site, while the Getty Center encourages visitors to arrive in tour buses to reduce traffic, and numerous school buses visit the Getty Center during weekdays, the main parking structure only provides 14 spaces for buses. Due to the limited capacity to provide bus parking on-site, some buses are directed to leave the site after passengers are disembarked and are asked to return when scheduled to pick up passengers for departure. Accordingly, instead of one inbound and one outbound trip into the Getty Center, some buses currently make two such trips in order to pick up and drop off passengers.

The Project would provide storage for a minimum of nine additional buses through use of the vehicle parking area. Thus, buses that were previously sent off site due to insufficient storage space within the main parking structure would instead be directed to the Oak Parking Lots. Bus passengers would continue to be discharged and picked up at the main parking structure. Bus passengers would not be taken to the Oak Parking Lots. When fully utilized, the additional bus storage provided by the Project is estimated to result in the elimination of up to 30 bus trips per day on Sepulveda Boulevard (i.e., the trips associated with buses currently being diverted from the site while passengers are visiting the Getty Center). The reduction of bus traffic may be higher on some days as the Getty Center would stagger bus visitors throughout the day (e.g., school buses arrive in the morning and regular tour buses arrive in the afternoon). The Getty Center does not expect bus traffic to increase in conjunction with the Project as the physical capacity to drop off and pick up bus passengers within the main parking structure would not change.

As determined in the Traffic Assessment, implementation of the Project would substantially improve traffic flow within the Getty Center, reduce vehicle queues related to inbound traffic during peak visitation days, enhance overall operations at the Sepulveda Boulevard/Getty Center Drive intersection, and provide sufficient on-site parking.

Based on the above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

**b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**Less Than Significant Impact.** Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for a land use project, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.

Projects that decrease vehicle miles traveled in the project area compared to existing conditions should also be presumed to have a less than significant transportation impact.

As previously discussed, the Project involves the construction of two new landscaped surface parking areas within the Project Site for use by the Getty Center. Ancillary improvements include shaded benches and a restroom structure. LADOT's Transportation Assessment 2019 Guidelines do not consider parking spaces to be a use that generates vehicle trips. In addition, the only building associated with Project would be a small restroom for drivers and passengers that would be intermittently used and also would be an ancillary use to the existing Getty Center. Use of the restroom would require access to the parking areas, and therefore it also would not generate independent vehicle trips. Thus, neither the Project's parking areas nor its restroom would directly generate vehicle trips or VMT. Rather, trip generation at the Getty Center would continue to be associated with attendance and programming at the Getty Center itself. As such, no additional review of potential transportation impacts is required under LADOT's 2019 Guidelines. While a detailed VMT analysis has not been prepared because one in not required by LADOT's 2019 Guidelines, the Project would likely reduce vehicle trips and VMT at the Getty Center since the Project would substantially eliminate the need to turn away visitors during peak visitor days, and the Project would eliminate the need for buses to leave the Getty Center and return later in the day due to insufficient bus parking.

Based on the above, the Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3 related to VMT. Impacts would be less than significant, and no mitigation is required.

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

**No Impact.** The Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed parking uses would be consistent with the surrounding uses and would not introduce hazards due to incompatible uses. Thus, no potential impacts related to a substantial increase in hazards due to a geometric design feature or incompatible uses would occur, and no mitigation measures are required.

**d. Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** According to the Safety Element of the City of Los Angeles General Plan, the nearest designated disaster route to the Project Site is Sepulveda Boulevard, which is located east of the Project Site. Construction activities related to a development project may potentially affect access in and around a project site. However, the construction of the Project would not require the closure of any travel lanes on any nearby public streets (e.g., Sepulveda Boulevard) and all construction activities would take place on-site. In addition, all construction workers would park on-site. Furthermore, construction activities would not result in the loss of existing vehicle, bicycle or pedestrian access or the temporary loss of a bus stop. As such, emergency access impacts associated with the construction of the Project would be less than significant and no mitigation measures are required.

With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Sepulveda Boulevard. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. As previously discussed, the Project also provides increased access in the Sepulveda Pass area for LAFD and other emergency responders. As part of the I-405 Freeway Sepulveda Pass Widening Project, Caltrans widened the access road to the Project Site to 24 feet so that it can accommodate fire trucks and emergency access. The Project involves extending water conveyance infrastructure under this access road into the Project Site, where fire hydrants would be installed to enable LAFD to use the parking lot areas to help protect the surrounding communities from fire danger. The Getty would also make the new parking areas available to LAFD and other emergency responders as a staging area in the event of an emergency, like other areas on the Getty Center property. Therefore, the Project would not result in inadequate emergency access within the Project Site or vicinity. Therefore, operational impacts associated with emergency access would be less than significant, and no mitigation measures are required.

## XVIII. TRIBAL CULTURAL RESOURCES

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:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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. | ☐ | ☐ | ☒ | ☐ |

The following analysis is based, in part, on the Tribal Cultural Resources Report prepared for the Project by Dudek, dated October 2021. The Tribal Cultural Resources Report is included as Appendix IS-10 of this Initial Study/MND.

**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)?**

**No Impact.** As discussed in the Tribal Cultural Resources Report, results of the cultural resources records search indicated that one previously recorded cultural resource is located within 0.5-mile of the Project Site. This resource is the Mount Saint Mary's College Historical District, which is less than 0.5-mile southwest of the Project Site. However, no pre-historic archaeological sites or other resources documented to be related to past Native American activity have been previously identified within the Project Site or the surrounding 0.5-mile records search buffer. The records search includes resources listed or eligible for listing in the California Register or in a local register of historical resources. In addition, the Project Site is not listed or eligible for listing in the California Register or in a local register of historical resources, as defined in PRC Section 5020.1(k). As such, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe and that is listed or eligible for listing in the California Register or in a local register of historical resources. Thus, no impacts would occur, and no mitigation is required.

**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?**

**Less Than Significant Impact.** As discussed in Section 3, Project Description, of this Initial Study/MND, the Project would involve minimal grading. Construction would require approximately 3,500 cubic yards of earthwork consisting of approximately 1,400 cubic yards of soil export and approximately 2,100 cubic yards of soil import. No deep excavation is required for development of the Project.

Based on the results of the records searches (i.e., SCCIC and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site included in the Tribal Cultural Resources Report prepared for the Project (included in Appendix IS-10 of this Initial Study/MND) demonstrate that there is no record or evidence of tribal cultural resources on the Project Site or the immediately surrounding area. As such, no tribal cultural resources or known cultural resources have been identified that could be impacted by the Project. Furthermore, in compliance with the requirements of AB 52, the City provided formal notification of the Project on September 25, 2019. Tribes contacted included San Fernando Band of Mission Indians, Soboba Band of Luiseño Indians, Desert Cahuilla Indians, Gabrielino- Tongva Tribe, Gabrielino/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, and Fernandeño Tataviam Band of Mission Indians. The Gabrieleño Band of Mission Indians—Kizh Nation responded to the Project notification and requested consultation. This consultation involved written communication, telephone communication, and e-mail correspondences, as documented in the administrative case file. At the conclusion of consultation,

the Gabrieleño Band of Mission Indians—Kizh Nation and the Department of City Planning determined that there are no tribal cultural resources on the Project Site or in the immediate vicinity.

Based on the above, the City has determined that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe and that was determined by the City, 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. As such, impacts related to tribal cultural resources would be less than significant. Nonetheless, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project. If the City determines that the object or artifact appears to be a tribal cultural resource, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Getty Center would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resource monitoring plan and once the plan is approved by the City, ground disturbance activities could resume. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Therefore, compliance with the City's standard condition of approval for an inadvertent discovery related to tribal cultural resources would ensure that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. As such, impacts would be less than significant, and no mitigation measures are required.

## 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? | ☐ | ☐ | ☒ | ☐ |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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. Would the project 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?**

**Less Than Significant Impact.** An analysis of the Project's impacts on water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities is provided below.

**Water**

Water service to the Project Site would continue to be supplied by the LADWP. As previously discussed, the Project involves the construction of two new landscaped surface parking areas within two existing graded lots and ancillary improvements, including a restroom station, light poles, and an emergency phone. Construction activities for the Project would result in a temporary demand for water associated with dust control, equipment and site cleanup, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. Given the limited construction activities, construction of the Project would result in an associated minimal water use associated with the construction activities previously mentioned. In addition, construction of the Project would span approximately six months and is anticipated to be complete by the end of 2022, further limiting the amount of water to be used. Furthermore, as concluded in LADWP's 2015 Urban Water Management Plan (UWMP), projected water demand for the City would be met by the available supplies during all hydrologic conditions (average year, single-dry year, and multiple-dry year) in each year from 2020 through 2040. Construction of the Project would be complete by 2022. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during Project construction. Therefore, the Project's construction-related impacts on water supply would be less than significant.

Water use associated with operation of the Project would include water for cleaning the parking area, water from the restroom station, water for landscape irrigation, and the occasional use of water fountains. Based on factors from the Sanitation Districts of Los Angeles County as well as the Evapotranspiration Adjustment Factor, the Project would result in a water demand of approximately 510 gallons per day (gpd). Specifically, the proposed restroom would generate approximately 25 gpd[91,92] and the proposed landscaping would generate approximately 485 gpd.[93,94] Based on LADWP's 2015 UWMP, in 2022 during average year hydrologic conditions, the City's water demand is forecasted to be approximately 624.96 acre-feet per year (AFY).[95] Therefore, the Project's water demand of approximately 510 gpd (approximately 0.571 AFY) would represent approximately 0.091 percent of LADWP's projected water demand of 624.96 AFY in 2022.[96] As such, the Project would not generate a substantial increase in the demand for water on the Project Site. In addition, as previously discussed, LADWP's 2015 UWMP concludes that projected water demand for the City would be met by the available supplies during all hydrologic conditions (average year, single-dry year, and multiple-dry year) in each year from 2020 through 2040, which would be well beyond build-out of the Project. Further updates to LADWP's UWMP would identify continued water supplies to meet the needs of the City. Therefore, the Project's demand for water during operation could be met by the City's available supplies. In addition, the Applicant would coordinate with the City to ensure that adequate water infrastructure is available to meet the required limited water demand of the Project. Therefore, the Project would not result in the construction of new main water facilities or expansion of existing facilities.

**Wastewater**

Construction activities for the Project would result in wastewater generation from construction workers on-site. Wastewater generation would occur incrementally throughout construction of the Project. However, construction workers would typically utilize portable restrooms, which would not directly contribute to wastewater flows from the Project Site. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows.

Overall, Project operations would generate approximately 65 (gpd) of wastewater.[97,98] Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 mgd and current wastewater flow levels are at 275 mgd. As such, the HWRP is operation at approximately 61 percent of its capacity, with a remaining available capacity of approximately 175 mgd and would have sufficient capacity to accommodate the minimal wastewater generated by the Project.

91 Based on the Sanitation Districts of Los Angeles County No. 22 Loadings Table.

92 250 sf x 0.10 gpd/sf = 25 gpd

93 [((50.1 x 0.62) x 0.13) x 34,390 sf = ~ 138,869 gallons per year

94 [((50.1 x 0.62) x 0.25) x 4,922 sf = ~ 38,222 gallons per year

95 [((644.7 AFY - 611.8 AFY) ÷ 5) x 2] + 611.8 AFY = ~ 624.96 AFY

96 ((0.571 AFY ÷ 624.96 AFY) x 100) = ~ 0.091 percent

97 Based on the Sanitation Districts of Los Angeles County No. 22 Loadings Table. The approach assumes the sewer flow is 2.6 times the water demand for the project.

98 250 sf x 0.26 gpd/sf = 65 gpd

Therefore, the Project would not result in the construction of new wastewater treatment facilities or expansion of existing facilities.

### Stormwater Drainage

As discussed above in Response to Checklist Question X.c, stormwater runoff from the Project Site currently flows to the southern limits of the Project Site and west at the lower elevated valley, where it is collected in several existing debris basins and routed by channels to the stormdrain system. Development of the Project would result in an increase in impervious surfaces, which could potentially increase the amount of surface runoff. However, as required by the Los Angeles County MS4 Permit, the entire post-development Stormwater Quality Design volume must be treated for greater of the first 0.25 inch of 85 percent, 24-hour rain event. Accordingly, the structural and non-structural BMPs for the Project have been designed to treat stormwater runoff from all storms up to and including the 85 percent, 24-hour storm event, which is greater than the required 0.25-inch discharge. As summarized in Table 3 of the Hydrology and Water Quality Report, the volume to be treated is 3,489 cubic feet and 3,980 cubic feet within Drainage Areas 1 and 2, respectively. The Project would include the installation of several catch basins that capture the stormwater runoff. Stormwater would be directed into EPIC planters for treatment and storage, and overflow of the EPIC system would be discharged to the existing channel and stormdrain pipe. The EPIC planters would have a storage volume of 3,652 cubic feet for Drainage Area 1 and a storage volume of 4,171 cubic feet for Drainage Area 2. As such, the proposed EPIC planters would include a greater storage volume than required. In addition, as previously discussed, the EPIC system would be designed in accordance with the City's Low Impact Development Manual to offset the Project's change in the Project Site's existing pervious conditions. Specifically, Appendix A of the Hydrology and Water Quality Report provides the design calculations of the EPIC system in accordance with the City's requirements and demonstrates that the proposed EPIC system would be adequately sized to hold the required volume of water during a specified rainfall event. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. As such, the Project would not result in the construction of new off-site storm water drainage facilities, or expansion of existing facilities.

### Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from existing electrical poles near the Project Site. The Project would result in an increase in electricity usage on the Project Site compared to existing conditions because the Project Site is currently vacant and generates no electricity. As shown above in Table 4 on page 58, with buildout of the Project, the on-site electricity demand would be approximately 986 MWh of electricity per year.[99] LADWP forecasts that its total energy sales in the 2021–2022 fiscal year will be 22,613 gigawatt-hours (GWh) of electricity.[100,101] The Project's electricity demand would represent approximately 0.004 percent of LADWP's projected sales in 2022. Accordingly, operation of the Project would not result in an

[99] Electricity demand estimate based on LED lighting. Calculations are provided in Appendix IS-4 of this Initial Study/MND.

[100] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

[101] LADWP, 2017 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1.

increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities.

### Natural Gas

The Project would not require natural gas during construction or operations. As the Project would not result in an increase in demand for natural gas, the Project would not affect available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

### Telecommunications

The Project would require construction of new or extension of existing on-site telecommunications infrastructure to serve the proposed blue light emergency phones. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. All on-site work would be within the overall Project construction, which has been analyzed. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers.

Based on the above, the Project would not 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. As such, impacts would be less than significant, and no mitigation is required.

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

**Less Than Significant Impact.** As previously discussed, water service to the Project Site would continue to be supplied by LADWP. The Project involves the construction of two new landscaped surface parking areas within two existing graded lots and ancillary improvements, including a restroom station, light poles, and an emergency phone. Construction activities for the Project would result in a temporary demand for water associated with dust control, equipment and site cleanup, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. Given the limited amount of construction activities and duration of construction (six months), construction of the Project would result in an associated minimal water use associated with the construction activities previously mentioned. As concluded in LADWP's 2015 UWMP, projected water demand for the City would be met by the available supplies during all hydrologic conditions (average year, single-dry year, and

multiple-dry year) in each year from 2020 through 2040. Construction of the Project would be complete by 2022. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during Project construction. Therefore, the Project's construction-related impacts on water supply would be less than significant.

Water use associated with operation of the Project would include water for cleaning the parking area, water from the restroom station, water for landscape irrigation, and the occasional use of water fountains. As previously discussed, the Project would result in a water demand of approximately 510 gpd. As such, the Project would not generate a substantial increase in the demand for water on the Project Site. In addition, as previously discussed, LADWP's 2015 UWMP concludes that projected water demand for the City would be met by the available supplies during all hydrologic conditions (average year, single-dry year, and multiple-dry year) in each year from 2020 through 2040, which would be well beyond build-out of the Project. Further updates to LADWP's UWMP would identify continued water supplies to meet the needs of the City. With respect to reasonably foreseeable future development, LADWP's 2015 UWMP takes into account climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Therefore, the Project's demand for water during operation could be met by the City's available supplies. As such, the Project would not generate a substantial increase in the demand for water on the Project Site, which could affect existing water supplies. Based on the limited need for water on the Project Site, it is anticipated that sufficient water supplies would be available to serve the Project and reasonably foreseeable future development. Therefore, impacts would be less than significant, and no mitigation is required.

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

**Less Than Significant Impact.** As discussed above in Response to Checklist Question XIX.a, the Project would generate approximately 65 gpd of wastewater during operations. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. The HWRP has a capacity of 450 mgd and current wastewater flow levels are at 275 mgd. As such, the HWRP would have sufficient capacity to accommodate the Project. Therefore, the Project would not result in a determination by the wastewater treatment provider that serves the Project Site that it does not have adequate capacity to serve the Project. As such, the Project's impact on the wastewater treatment provider would be less than significant impact, and no mitigation measures are required.

**d. Would the project 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 (LASAN) 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.[102] Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.[103] In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County open to the City is estimated at 148.4 million tons. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 58.84 million tons of remaining capacity and an average daily in-County disposal rate of 854 tons per day.[104] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP 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.[105]

Additionally, 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 implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[106] The City is currently diverting 76 percent of its waste from landfills.[107] 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.

### Construction

The Project Site currently consists of two unpaved, vacant lots with gravel surface. As such, the Project would not generate any solid waste associated with the demolition of onsite buildings or other structures. The Project would include construction of two new landscaped surface parking areas and ancillary improvements, including a restroom station, light poles, and an emergency phone. Construction-related solid waste could include the removal of rock and soil from the Project Site,

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

[103] County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach 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.

[104] County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

[105] County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

[106] LA Sanitation, Solid Waste Integrated Resource Plan FAQ.

[107] 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 June 10, 2021.

remnants of asphalt paving once the surface parking areas have been paved, cardboard and plastic, pruning and trimmings associated with landscape installation, and other miscellaneous construction-related waste such as paint cans, gloves, paint brushes, etc. Due to the size of the Project and its use for surface parking, the solid waste that could be generated by the Project would represent a small fraction of the landfills accepting construction-related waste. In addition, some of the solid waste materials generated could be recycled and diverted from landfills. In particular, pursuant to the requirements of SB 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. Due to the Project Site's existing conditions and proposed uses, it is anticipated that the remaining permitted capacity at the Azusa Land Reclamation facility (approximately 58.84 million tons) as well as the remaining at the Class III landfills open to the City (148.4 million tons) would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

**Operation**

As previously discussed, the Project would include two new landscaped surface parking areas and ancillary improvements, including a one-story, 250-square-foot restroom station, light poles, an emergency phone, and trash receptacles. Solid waste generated by the Project during operation could include landscaping waste associated with landscape maintenance, food waste that visitors may leave at the Project Site, and any waste associated with the restroom station. Due to the use of the Project as surface parking, the Project would not include a use that would generate a substantial amount of solid waste. Therefore, given the proposed uses, the solid waste generated by the Project Site would represent a *de minimis* amount of the remaining capacity (148.4 million tons) for the County's Class III landfills open to the City of Los Angeles. In addition, the Getty Center would continue to incorporate 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 waste to adopt recycling practices or 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.[108]

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

**e. Would the project 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 (Assembly Bill 939 (AB 939)), which

[108] 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 June 10, 2021.

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, Assembly Bill 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, Assembly Bill 341 (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 Assembly Bill 1826 (AB1826), requiring businesses to recycle their organic waste[109] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week are 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 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, the impact would be less than significant, and no mitigation measures are required.

## 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? | ☐ | ☐ | ☒ | ☐ |

[109] 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.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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. Would the project substantially impair 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 closest disaster routes to the Project Site include the I-405 Freeway and Sepulveda Boulevard, located adjacent to the Project Site. Based on the area of the Project Site and the proposed use as surface parking, it is expected that construction activities for the Project would be confined to the Project Site. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Sepulveda Boulevard and Getty Center Drive. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Further, as part of the I-405 Freeway Sepulveda Pass Widening Project, Caltrans widened the access road to the Project Site to 24 feet so that it can accommodate fire trucks and emergency access. Therefore, the Project would not impede emergency access within the Project Site vicinity or cause an impediment along the City's designated disaster routes such that it would impair the implementation of the City's emergency response plan. Therefore, Project impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required.

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

**Less Than Significant Impact.** The Project Site is currently flat and would remain flat with implementation of the Project. No slope, prevailing wind, or other factors would exacerbate wildfire risks. The Project does not include the construction any new of habitable buildings or uses that would introduce a new permanent population on the Project Site. As indicated previously, the Project Site is located within a City-designated Very High Fire Hazard Severity Zone and within a City-designated fire buffer zone. All projects located within these areas must comply with the requirements for the Mountain Fire District, as outlined in Section 57.25.01 of the LAMC. These requirements include controls on the use and placement of construction materials, greenbelt requirements, the use of fire-resistant plants and materials, and the regular clearing of brush. With adherence to these requirements, which have been formulated to protect development against wildland fires in hillside areas, the Project would not exacerbate wildfire risks. Therefore, the Project would not expose project occupants to pollutant concentrations from a wildfire. In addition, the Project would extend

water conveyance infrastructure under the access road into the Project Site, where fire hydrants will be installed to enable LAFD to use the parking lot areas to help protect the surrounding communities from fire danger. As a consequence, the Project would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, impacts would be less than significant, and no mitigation measures are required.

**c. Would the project 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?**

**Less Than Significant Impact.** The Project would be served by existing roads and infrastructure. As discussed in Section 3, Project Description, of this Initial Study/MND, the Project would be designed to reduce wildfire threats in the Santa Monica Mountains. Given that the Project Site currently provides increased access in the Sepulveda Pass area for LAFD and other emergency responders, the Project would extend water conveyance infrastructure under the access road into the Project Site, where fire hydrants will be installed to enable LAFD to use the parking lot areas to help protect the surrounding communities from fire danger. The installation of this water conveyance infrastructure would occur during construction of the Project.

As previously discussed, the Project Site is located within a City-designated Very High Fire Hazard Severity Zone and within a City-designated fire buffer zone. Projects located within a Very High Fire Hazard Severity Zone must comply with the requirements set forth for the Mountain Fire District, as outlined in Section 57.25.01 of the LAMC. These requirements include the use and placement of construction materials, greenbelt requirements, the use of fire-resistant plants and materials, and the regular clearing of brush. In accordance with the requirements set forth Section 57.25.01 of the LAMC, construction of the Project would include the implementation of standard construction industry practices to minimize the fire risk of construction activities within a fire zone. In addition, the extension of the existing water conveyance infrastructure would actually serve to reduce wildfires. Also, as part of the I-405 Freeway Sepulveda Pass Widening Project, Caltrans widened the access road to the Project Site to 24 feet such that the road would accommodate fire trucks and emergency access. The Project would also make the new parking areas available to LAFD and other emergency responders as a staging area in the event of an emergency, like other areas on the Getty Center property. Therefore, the Project would not require the installation or maintenance of infrastructure that may exacerbate fire risk or that would result in impacts to the environment. Therefore, impacts would be less than significant, and no mitigation measures are required.

**d. Would the project 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?**

**Less Than Significant Impact.** The Project Site is located within a City-designated Very High Fire Hazard Severity Zone[110] and is located within a City-designated fire buffer zone.[111] However, the

[110] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, 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.

Project would not include the construction of any new habitable buildings or uses that would introduce a new permanent population on the Project Site which could be exposed to potential fire risks from the Project Site's proximity to the Santa Monica Mountains including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. In addition, the Project would be limited to the boundaries of the Project Site and would not include construction activities in the surrounding hillsides such that stability of the surrounding hillsides would be compromised. Further, upon buildout of the Project, the existing topography of the Project Site would not be substantially altered, and the Project Site would remain flat. In addition, as discussed in Section 3, Project Description, of this Initial Study/MND, the Project would be designed to reduce wildfire threats in the Santa Monica Mountains. Given that the Project Site currently provides increased access in the Sepulveda Pass area for LAFD and other emergency responders, the Project would extend water conveyance infrastructure under the access road into the Project Site, where fire hydrants will be installed to enable LAFD to use the parking lot areas to help protect the surrounding communities from fire danger. In addition, as part of the I-405 Freeway Sepulveda Pass Widening Project, Caltrans widened the access road to the Project Site to 24 feet so that it can accommodate fire trucks and emergency access. The Project would also make the new parking areas available to LAFD and other emergency responders as a staging area in the event of an emergency, like other areas on the Getty Center property. In addition, the Project would install drought tolerant landscaping and irrigation on the Project Site, which will help reduce the risk of fire in and around the parking areas.

Moreover, 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. It should be noted that no downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes occurred after the Getty Fire, which burned areas surrounding the Project Site between October 28 and November 5, 2019. Therefore, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required.

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

# 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?**

**Less Than Significant Impact.** The Project Site is located in an urbanized area and does not include habitat for fish or wildlife species. Therefore, the Project would not substantially reduce the habitat of fish or wildlife species as well as cause a fish or wildlife population to drop below self-sustaining levels. In addition, the Project Site is currently devoid of any vegetation which may attract wildlife to the Project Site. Based on the current conditions of the Project Site and lack of habitat, it is unlikely any candidate, sensitive, or special status species in local or regional plans, policies, or regulations or listed by the CDFW or by the U.S. Fish and Wildlife Service would be present on-site. As such, the Project would not threaten to eliminate a plant or animal community or substantially reduce the number or restrict the range of a rare or endangered plant or animal. The Project also would not adversely affect historic resources, and no impact to historic resources would occur with implementation of the Project. Additionally, with compliance with existing regulations, impacts to unknown cultural resources (including archeological resources) and tribal cultural resources that may be encountered during construction would be less than significant. Overall, with compliance with existing regulatory requirements, impacts would be less than significant, and no mitigation measures are required.

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

**Less Than Significant Impact.** The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project Site, thereby resulting in impacts that are greater than the impacts of the Project alone. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts."[112] In accordance with CEQA, the analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to "be guided by the standards of practicality and reasonableness."[113] Located within the vicinity of the Project Site are other current and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. A total of six related projects have been identified by LADOT within a 2-mile radius of the Project Site. These include the following:

- **Related Project No. 1:** Leo Baeck Temple Expansion located at 1300 N. Sepulveda Boulevard. Involves a 70,000-square-foot temple expansion and child care for 168 students.

- **Related Project No. 2:** Archer School for Girls Renovation located at 11725 W. Sunset Boulevard. Involves expansion of the existing school.

- **Related Project No. 3:** Brentwood School Education Master Plan located at 12001 W. Sunset Boulevard. Involves expansion of the existing school.

- **Related Project No. 4:** Mount Saint Mary's University Wellness Center located at 12001 W. Chalon Road. Involves a 32,250-square-foot expansion.

- **Related Project No. 5:** 115 S. Barrington Avenue Mixed Use Project. Involves the development of 20 condominium units and 13,000 square feet of retail.

- **Related Project No. 6:** 2301 N. Sepulveda Boulevard Improvement Project involves the development of a 500-acre recreational park.

The nearest related projects to the Project Site include Related Project No. 1, located approximately 0.3-mile (driving) east of the Project Site, and Related Project No. 4, located approximately 1.8 miles (driving) west of the Project Site. Related Project No. 1 is separated from the Project Site by the I-405 Freeway and Sepulveda Boulevard while Related Project No. 4 is separated from the Project Site by the intervening hillsides. As the following analysis indicates, due to the distance of most of the related projects from the Project Site and specific on-site and surrounding conditions, the Project would not result in significant cumulative impacts for any of the environmental issue areas.

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[112] State CEQA Guidelines, 14 California Code of Regulations, Section 15355, et seq.

[113] State CEQA Guidelines, 14 California Code of Regulations, Section 15355, et seq.

- **Aesthetics**—Given the locations of the nearest related projects and intervening uses, the Project and related projects would not combine to alter existing views of visual resources or the aesthetic environment in the vicinity of the Project Site. Similarly, based on the distance of related projects, the location of the Project Site, and compliance with CALGreen and Title 24 requirements that stipulate the use of appropriate light and glare control, the Project and related projects would not combine to create a new source of substantial light or glare. Related projects would also be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Therefore, the Project and related projects would not result in significant cumulative impacts associated with aesthetics. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Agriculture and Forestry Resources**—The Project area is urbanized and no agricultural lands or uses exist within and in the vicinity of the Project Site. While there are some areas in the adjacent Santa Monica Mountains zoned for agricultural uses, the land remains vacant and is not used for agricultural uses. In addition, the Project Site and immediate vicinity are not zoned for forest land and do not include any forest or timberland. Therefore, implementation of the Project and related projects would not convert farmland, forest land, or timberland. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to agriculture and forestry resources. As such, the Project's contribution would not be cumulatively considerable, no cumulative impacts would occur.

- **Air Quality**—According to SCAQMD, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed in Response to Checklist Question III, peak daily emissions of the Project's construction-related pollutants or operational emissions would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the Project would not result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the emissions of non-attainment pollutants and precursors. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Biological Resources**—Due to their site-specific nature, impacts on biological resources are typically assessed on a project-by-project basis. As discussed above, the Project Site supports only ruderal vegetation which is marginal habitat for wildlife and the areas to the south of the survey area are urbanized. However, the buffer area around the site is within undeveloped areas supporting native vegetation, and the hills on both sides of the survey area are undeveloped. The buffer area may be used for local foraging and wildlife movement; however, based on the conditions of the Project Site and urban development south of the survey area, most wildlife movement would be expected to be north and west of the Project Site, and wildlife use of the Project Site would be incidental. While direct impacts on wildlife movement are not anticipated, noise, dust, and vibration from Project construction activities could result in indirect impacts on wildlife within areas west and north of the Project Site. However, with implementation of the project design features and mitigation measures listed above, potential indirect impacts would be reduced to less than significant. Similarly, each related project would address their site-specific conditions

relative to habitat and species that may be found on their sites. Furthermore, related projects would be required to comply with the City's Protected Tree Regulations and the Migratory Bird Treaty Act. Compliance with these regulatory requirements would reduce any potential impacts associated with removal of protected tree species. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to biological resources. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Cultural Resources**—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. With regard to potential cumulative impacts related to archeological resources, the Project vicinity is located within an urbanized area that has been disrupted over time. In the event that archaeological resources are uncovered, each related project would be required to comply with regulatory requirements. In addition, 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 archaeological resources. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to cultural resources. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Energy**—As with the Project, the related projects would be expected to implement energy conservation features to minimize the inefficient use of energy, in accordance with applicable regulations, including the City's Green Building Ordinance and Title 24 energy efficiency standards. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Geology and Soils**—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. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to geology and soils. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Greenhouse Gas Emissions**—Based on the methodology for determining project-related GHG impacts presented above in Checklist Question No. VIII, Greenhouse Gas Emissions, the analysis of greenhouse gas emissions is already cumulative in nature. As evaluated above, the Project would not result in significant impacts associated with greenhouse gas emissions. Therefore, the Project and related projects would not result in significant cumulative impacts associated with greenhouse gas emissions. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Hazards and Hazardous Materials**—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 such regulations, the Project and related projects would not result in significant cumulative impacts with regard to hazards and hazardous materials. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Hydrology and Water Quality**—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 and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than one acre, compliance with SUSMP requirements during operation, and compliance with 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. In addition, given the proximity between the Project and related projects, it is unlikely that stormwater runoff from the Project Site would merge with stormwater runoff from the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to hydrology and water quality. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Land Use and Planning**—As with the Project, related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Furthermore, no related projects that could cause land use incompatibility are known to be located in the immediate vicinity of the Project Site. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to land use and planning. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Mineral Resources**—As the Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey, the Project would not result in the loss of a locally-important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur in the Project vicinity. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to mineral resources. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would not occur.

- **Noise**—Cumulative impacts related to noise typically occur when construction of a related project occurs simultaneously with the construction of another related project and there are sensitive uses in between both construction sites such that the noise levels of the related projects could combine and substantially increase noise at sensitive uses. As discussed above, the nearest related project to the Project Site includes Related Project No. 1 (Leo Baeck Temple Expansion), located approximately 0.3 mile (driving) east of the Project Site. However, Related Project No. 1 is separated from the Project Site by the I-405 Freeway and Sepulveda Boulevard. As such, there are no sensitive uses located between the

Project Site and Related Project No. 1 that could be affected in the event of concurrent construction of the Project and Related Project No. 1. In addition, based on the anticipated noise levels from the Project Site, which would be lower than existing ambient noise levels, the Project will not increase noise levels at other sensitive uses in the vicinity of the Project Site. Furthermore, with compliance with regulatory requirements, noise impacts from construction and operation of the Project would be less than significant. Like the Project, related projects would also be required to comply with LAMC requirements related to construction and operational noise. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to noise. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Population and Housing**—As discussed above, the Project proposes the construction of two new landscaped surface parking areas within two existing vacant lots and thus would not directly contribute to population growth within the Project Site area. Thus, the Project would not induce substantial population growth or displace substantial numbers of people. As provided above, only one of the related projects involves the development of residential uses, which would directly introduce a new population to the vicinity. Specifically, Related Project No. 5 involves the development of 20 condominium units and 13,000 square feet of retail. Given the number of units proposed, the potential increase in population and housing would be expected to be within City and SCAG growth forecasts. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to population and housing. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Public Services—Fire Protection**—With regard to facilities and equipment, the related projects and other development in the City would be required to implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Related projects may include the installation of automatic fire sprinklers to enhance fire safety, which would further reduce the demand placed on the LAFD facilities and equipment. The Project, as well as the related projects, would also generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Through the City's regular budgeting efforts and updates to LAFD's Strategic Plan, LAFD's resource needs would be identified and allocated according to the priorities at the time. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to fire protection. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Public Services—Police Protection**—The Project would not introduce a new residential population to the Project Site. To help reduce any on-site increase in demand for police services, the Project and related projects would implement comprehensive safety and design features to enhance public safety and reduce the demand for police services. In

addition, as previously mentioned, the Getty Center maintains its own comprehensive on-site security staff, further reducing the Project's need for additional police protection services. The Project, as well as the related projects, would generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate. Furthermore, in accordance with the police protection-related goals, objectives, and policies set forth in the City's General Plan Framework Element, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to police protection. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Public Services—Schools, Parks, Libraries, and Recreation**—The Project would not generate a residential population that could increase the demand for schools, parks and recreational facilities, and libraries. Therefore, the Project would not contribute to an increased demand for these services. With regard to schools, 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. The related projects would also be required to provide open space and recreational amenities and 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. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities and library services in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools, parks, libraries, and recreation. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Transportation**—As discussed above, the Project involves the construction of two surface parking areas for use by the Getty Center and would not directly generate new vehicle trips. Therefore, the Project would not contribute to a cumulative impact related to transportation. In addition, while some related projects may result in a significant impact related to transportation, such related projects would implement appropriate mitigation to address such impacts. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to transportation. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Tribal Cultural Resources**—As discussed above, the results of the cultural resources records search indicated that one previously recorded cultural resource is located within 0.5-mile of the Project Site. This resource is the Mount Saint Mary's College Historical District, which is less than 0.5-mile southwest of the Project Site. However, no pre-historic

archaeological sites or other resources documented to be related to past Native American activity have been previously identified within the Project Site or the surrounding 0.5-mile records search buffer. Furthermore, as discussed above, the Gabrieleño Band of Mission Indians—Kizh Nation and the Department of City Planning determined that there are no tribal cultural resources on the Project Site or in the immediate vicinity. As with the Project, each related project would be required to conduct record searches and/or consult with tribes traditionally associated with the individual related project site to determine the potential for resources to be located on-site. In the event that tribal cultural resources are uncovered, the Project and each related project would be required to comply with applicable regulatory requirements through compliance with the City's standard Condition of Approval to address inadvertent discovery of tribal cultural resources. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to tribal cultural resources. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Utilities and Service Systems—Water, Wastewater, and Stormwater**—Due to the shared urban infrastructure, the Project and related projects would cumulatively increase water consumption, wastewater generation, and stormwater discharge.

  As concluded in LADWP's 2015 UWMP, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040. Further, with respect to additional growth within the LADWP service area, through LADWP's UWMP process, the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. In addition, given the size of the Project and related projects, it is anticipated that the water demand generated by both the Project and related projects would comprise a very small percentage of the projected water demand for the City. Therefore, LADWP would be able to supply the demands of the Project and projected future growth through 2040 and beyond. In addition, in accordance with the City's Green Building Ordinance, certain water conservation measures are required to be implemented by the City. Such measures would reduce water use associated with the Project and related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to water supply. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

  Development of the related projects would result in an increase in the demand for sanitary sewer service in LA Sanitation's HWRP. As described above in Response to Checklist Question No. XIX.a, the existing design capacity of the HWRP is approximately 450 mgd and current wastewater flow levels are at 275 mgd. Based on the future wastewater flow and the wastewater treatment capacity of the HWRP, sufficient wastewater treatment capacity would be available to serve the Project and related projects. In addition, the City would continue to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. New development projects occurring in the vicinity of the Project Site, including the related projects, would also be required to coordinate with LASAN via a sewer capacity availability request to determine adequate sewer capacity. In addition, given the related projects' proximity to the Project Site, it is unlikely that any of the related projects would utilize the same stormwater conveyance system as the Project. Furthermore, new development projects, including the related projects, would be subject to Los Angeles Municipal Code Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wastewater treatment systems. As such, the Project's

contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to stormwater infrastructure, as with the Project, related projects would be required to comply with the requirements of the City's LID Ordinance. In accordance with the City's LID Ordinance, related projects would also implement BMPs to capture a specified amount of runoff within the Project Site and reduce the potential impact of increased runoff to existing drainage systems. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to stormwater infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Based on the above, as the service providers conduct ongoing evaluations to ensure that facilities are adequate to serve the forecasted growth of the community, impacts on these utilities would be less than significant.

- **Utilities and Service Systems—Energy, Natural Gas and Telecommunications Infrastructure**—Development of the Project and related projects would increase the use of electricity and natural gas and could require new or expanded telecommunications infrastructure. As discussed above, the Project's electricity demand would represent a nominal percent of LADWP's projected sales for the Project's build-out year. While the Project would not result in a need for natural gas, given the size and types of uses associated with the related projects, the related projects would not be anticipated to generate a substantial increase in the demand for electricity and natural gas. Therefore, although the Project and related projects could result in the use of electricity and natural gas resources during construction and operation, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP's and SoCalGas' service areas. Additionally, as with the Project, the installation of any required telecommunications infrastructure associated with the related projects would occur during a relatively short duration and would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to energy, natural gas, and telecommunication infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Utilities and Service Systems—Solid Waste**—The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed above in Response to Checklist Question No. XIX.d, the Azusa Land Reclamation facility and the Class III landfills open to the City would have sufficient capacity to accommodate construction waste disposal needs, including from the Project and related projects. In addition, based on the 2019 ColWMP Annual Report, the County anticipates that future disposal needs can be adequately met if individual jurisdictions 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. Furthermore, the City of Los Angeles implements numerous source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling to ensure that

landfill capacity is adequate to serve the forecasted disposal needs of the City.[114] Therefore, the Project and related projects would not result in significant cumulative impacts with respect to solid waste. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Wildfire**—As discussed above, the Project would not include the construction of any new buildings or uses that would introduce a new permanent population on the Project Site which could be exposed to potential fire risks from the Project Site's proximity to the Santa Monica Mountains. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects 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. With compliance with existing City regulations regarding wildfires, the potential for any of the related projects to result in a significant impact associated with wildfires would be addressed. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfire. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Based on the above, the Project would not result in significant cumulative impacts.

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

**Less Than Significant Impact**. Based on the analyses presented above, the Project would not result in environmental effects which will cause substantial adverse effects on human beings, and as such, impacts would be less than significant.

[114] City of Los Angeles, Solid Waste Integrated Resource Plan FAQ.