

# **WEST LA COMMONS PROJECT**

**Project No. PRJ2022-000303**  
**Environmental Plan No. RPPL2022000742**

## **INITIAL STUDY**



Design by Koning Eizenberg Architecture. Rendering by Kilograph.

**PREPARED FOR:**  
**County of Los Angeles**  
**Department of Regional Planning**

**PREPARED BY:**  
**Eyestone Environmental, LLC**

**May 2022**

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# 1 INTRODUCTION

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West LA Commons, LLC (Applicant) has submitted an application for the proposed West LA Commons Project (Project) to the County of Los Angeles (County) Department of Regional Planning for ministerial site plan review and an application to the City of Los Angeles (City) Department of City Planning for discretionary land use entitlement review. The Applicant proposes to redevelop the Project Site pursuant to the West Los Angeles Civic Center and Courthouse Request for Proposal (RFP) jointly issued by the County and the City on May 15, 2020 (as amended pursuant to subsequent Addendums to the RFP) and the two subsequent Exclusive Negotiation Agreements entered into between the Applicant and the County and the Applicant and the City.

The Project Site is located entirely within the City boundaries. However, a portion of the Project Site is owned by the Judicial Council of California (County Property) and the balance of the Project Site is owned by the City (City Property).<sup>1</sup> The County has an option to purchase the County Property pursuant to a Lease Agreement with Option to Purchase as is relates to Court Facility #19-AR1, dated February 21, 2020 (including subsequent amendments). As such, and as set forth in the RFP, the County is exercising sovereign immunity over the County Property, and therefore, the County Property is not subject to the City's or the County's zoning regulations (California Government Code Sections 53090 et seq. and 26227). The County will require ministerial site plan review to develop the portion of the Project on the County Property and, as detailed in Section 3, Project Description, of this Initial Study, the County will require the following agreements with the Applicant for development on the County Property: Option agreements, ground leases, and Reciprocal Easement Agreement(s) between the County, City, and the Applicant. The City has land use jurisdiction over the City Property and will require approval of discretionary entitlements to develop the portion of the Project on the City Property. The City will also require various agreements with the Applicant for development on the City Property, as detailed in Section 3, Project Description, of this Initial Study, including: Disposition and Development Agreements, ground leases, construction agreement, and Reciprocal Easement Agreement(s) between the City and the Applicant.

The County is the Lead Agency and the City is the Responsible Agency for the environmental review of the Project under the California Environmental Quality Act (CEQA). The County, as Lead Agency, has determined that the Project is subject to CEQA and that the preparation of an Initial Study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), the County CEQA Guidelines (1987), the County's Environmental Checklist Form (2020), and the City CEQA Guidelines (1981, amended 2006). The County and City use Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based

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<sup>1</sup> As further explained below in Section 3.1, Project Summary, of this Initial Study, the Project Site includes City-owned land (Library and LAPD Parcels) that would not be redeveloped as part of the Project.

on the analysis provided within this Initial Study, the County has concluded the Project may result in significant impacts on the environment, and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are intended as informational documents, which are ultimately required to be considered and certified by the decision-making bodies of the County and the City prior to approval of the Project.

## 1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.<sup>2</sup>

## 1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

### 1. INTRODUCTION

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

### 2. EXECUTIVE SUMMARY

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

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<sup>2</sup> State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

### 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

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (<http://resources.ca.gov/ceqa>).

### 1.3.1 Initial Study

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

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for a proposed project. The NOP and Initial Study are circulated for a 30-day<sup>3</sup> review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the Lead Agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

### 1.3.2 Draft EIR

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

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<sup>3</sup> Although CEQA Guidelines Sections 15103 and 15082(b) require that each responsible and trustee agency and the State Office of Planning and Research provide a response to the lead agency within 30 days after receipt of notice, the Lead Agency also has discretion to extend the public comment period to accommodate for any unforeseen or special circumstances.

### **1.3.3 Final EIR**

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

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

## 2 EXECUTIVE SUMMARY

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<b>PROJECT TITLE</b>	<b>West LA Commons</b>
ENVIRONMENTAL CASE NO.	Project No. PRJ2022-000303, Environmental Plan No. RPPL2022000742 (County)
RELATED CASES	To be determined
<b>PROJECT LOCATION</b>	<p>The County Property, located west of Purdue Avenue, consists of six parcels and includes property addresses 11400, 11404, 11406, 11408, 11410, and 11412 West Santa Monica Boulevard; 1633, 1641, and 1647 South Purdue Avenue; and 1644 South Butler Avenue, Los Angeles, California 90025.</p> <p>The City Property, located east of Purdue Avenue, consists of two parcels and includes property addresses 11332, 11338, 11342, and 11344 West Santa Monica Boulevard; 1619, 1645, and 1667 South Corinth Avenue; 11342, 11343, 11345, 11346, and 11358 West Idaho Avenue; and 11343, 11347, 11353, 11359, 11407, and 11409 West Iowa Avenue; 1640, 1652, 1653, and 1657 South Purdue Avenue, Los Angeles, California 90025.</p> <p>The Library and LAPD Parcels, consists of two parcels (including a portion of a parcel associated with the City Property) and includes property addresses 11360 West Santa Monica Boulevard; and 11421 West Iowa Avenue; and 1656, 1660, and 1666 South Butler Avenue, Los Angeles, California 90025.</p>
ASSESSOR'S PARCEL NUMBER (APN)	4261-010-908 and 4261-011-915, -910, -909, -908, -911, -912, -913, and -914
COMMUNITY PLAN AREA	West Los Angeles <sup>4</sup>
GENERAL PLAN DESIGNATION	Public Facilities <sup>5</sup>
ZONING	PF-1XL (Public Facilities, Height District 1XL) <sup>6</sup>
SUPERVISORIAL DISTRICT	3—Kuehl
COUNCIL DISTRICT	11—Bonin

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<sup>4</sup> The County is exercising sovereign immunity over the County Property and therefore, the County Property is not subject to the County's or the City's zoning regulations.

<sup>5</sup> See Footnote No. 4.

<sup>6</sup> See Footnote No. 4.

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**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

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

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Aesthetics                       | <input checked="" type="checkbox"/> Greenhouse Gas Emissions      | <input checked="" type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Recreation                         |
| <input checked="" type="checkbox"/> Air Quality           | <input checked="" type="checkbox"/> Hydrology/Water Quality       | <input checked="" type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Biological Resources             | <input checked="" type="checkbox"/> Land Use/Planning             | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Cultural Resources    | <input type="checkbox"/> Mineral Resources                        | <input checked="" type="checkbox"/> Utilities/Service Systems          |
| <input checked="" type="checkbox"/> Energy                | <input checked="" type="checkbox"/> Noise                         | <input type="checkbox"/> Wildfire                                      |
| <input checked="" type="checkbox"/> Geology/Soils         | <input checked="" type="checkbox"/> Population/Housing            | <input checked="" type="checkbox"/> 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.

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Jolee Hui, Senior Regional Planner  
Printed Name, Title

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May 18, 2022  
Date

## EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

## 3 PROJECT DESCRIPTION

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### 3.1 PROJECT SUMMARY

West LA Commons, LLC (Applicant) proposes to redevelop the existing West Los Angeles Civic Center and West Los Angeles Courthouse with a new mixed-use development consisting of residential, neighborhood-serving commercial (retail/restaurant), municipal office, and senior community center uses (Project) pursuant to the West Los Angeles Civic Center and Courthouse RFP jointly issued by the County of Los Angeles (County) and the City of Los Angeles (City) on May 15, 2020 (as amended pursuant to subsequent Addendums to the RFP) and to the two subsequent Exclusive Negotiation Agreements entered into between the County and the Applicant and the City and the Applicant. The Project site is located in the City and is generally bounded by Santa Monica Boulevard to the north,<sup>7</sup> Corinth Avenue to the east, Iowa Avenue to the south, and Butler Avenue to the west (Project Site). The Project Site is comprised of approximately 8.68 acres, including 3.01 acres of land currently owned by the Judicial Council of California but subject to the County's option to purchase (County Property) that would be redeveloped,<sup>8</sup> 4.62 acres owned by the City (City Property) that would be redeveloped, and 1.05 acres of land owned by the City (Library and LAPD Parcels) that would remain as is.<sup>9,10</sup>

The Project would provide 926 residential units (495 market-rate and 431 income-restricted housing units with a total of 961,290 square feet of residential floor area), 36,569 square feet of neighborhood-serving commercial (retail/restaurant) uses, 76,341 square feet of municipal office uses, and 23,868 square feet of senior community center uses. For CEQA environmental analysis purposes, this Initial Study also includes as commercial floor area approximately 9,374 square feet of outdoor eating areas adjacent to ground floor restaurant spaces and the senior center,<sup>11</sup> as well as a proposed approximately 27,000-square-foot below-grade retail space within the portion of the Project on the County Property, which would not count as floor area for zoning purposes under either the County's or the City's zoning codes, resulting in a total commercial floor area of 70,965 square feet and a total senior center floor area of 25,846 square feet.

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<sup>7</sup> For ease of reference, these directions assume that Santa Monica Boulevard lies due north of the Project Site.

<sup>8</sup> The County has an option to purchase the County Property pursuant to a Lease Agreement with Option to Purchase as it relates to Court Facility #19-AR1, dated February 21, 2020 (including subsequent amendments).

<sup>9</sup> As further explained below in Section 3.2.2, Project Site Background and Existing Conditions, of this Initial Study, the portion of the Project Site at the corner of Santa Monica Boulevard and Purdue Avenue which includes the West Los Angeles Regional Branch Library (Library Parcel) that will remain, is considered part of the Project and Project Site because the Project is proposing to subdivide the West Los Angeles Regional Branch Library portion from the balance of the City Property. Moreover, the portion of the Project Site located at the corner of Butler Avenue and Iowa Avenue, which is currently a Los Angeles Police Department (LAPD) maintenance facility (LAPD Parcel), is also considered part of the Project and Project Site because the Project is proposing to merge public right-of-way adjacent to the LAPD maintenance facility parcel with the Project Site and to realign the property lines. However, the Library and LAPD Parcels will not be redeveloped, and will continue to serve City functions.

<sup>10</sup> These Project Site lot area calculations include the street dedications and the approximately 14,885 square feet of public right-of-way proposed to be vacated and merged as part of the Project's requested entitlements identified below in Section 3.4, Requested Permits and Approvals, of this Initial Study.

<sup>11</sup> The 9,374 square feet of outdoor eating areas is comprised of 5,680 square feet of covered and uncovered areas within the portion of the Project on the County Property and 3,694 square feet of uncovered areas within the portion of the Project on the City Property.

The proposed uses would be located within nine new structures ranging from two- to eight-stories with approximate heights from 43 feet to 100 feet to the top of the building (58 feet to 109 to the top of rooftop mechanical equipment). A total of 1,563 vehicle parking spaces would be provided within a three-level subterranean parking garage to a depth of 52 feet below ground surface. The Project would also include approximately 193,000 square feet of private, common, and publicly accessible open space throughout the Project Site, of which 112,382 square feet would comply with the Los Angeles Municipal Code (LAMC) definition of open space.

Other than the Library and LAPD Parcels, the Project would remove or replace the existing uses within the Project Site, including removing the approximately 36,995-square-foot West Los Angeles Courthouse building within the County Property and replacing the approximately 41,343-square-foot Municipal building and the 16,800-square-foot Felicia Mahood Multipurpose Center within the City Property.<sup>12</sup> The approximately 12,855-square-foot West Los Angeles Branch Library and the approximately 4,000-square-foot LAPD Vehicle Maintenance Facility on the Library and LAPD Parcels would remain and would not be redeveloped; however, the Project would subdivide the Library Parcel from the balance of the City Property and re-align the property lines for the Library and LAPD Parcels. The Library and the LAPD Parcels, as well as the existing improvements on these parcels will continue serving library and LAPD functions.

Upon completion, the Project would provide a total floor area of approximately 1,134,442 square feet within the Project Site, including 491,869 square feet of floor area with a floor area ratio (FAR) of approximately 3.75:1 on the County Property and 642,573 square feet of floor area with a FAR of approximately 3.19:1 on the City Property. Combined, the Project would have a FAR of approximately 3.41:1.<sup>13</sup> With inclusion of the existing Library and LAPD buildings that will remain, the Project would have a total floor area of 1,151,297 square feet. Table 1, Summary of Zoning and CEQA Analysis Floor Area, on page 11 provides a summary of the Project's total floor area for zoning code purposes and CEQA analysis purposes.

## **3.2 ENVIRONMENTAL SETTING**

### **3.2.1 Project Location**

As shown in Figure 1, Project Location Map, on page 12 and Figure 2, Aerial Photograph of the Project Site and Vicinity, on page 13, the Project Site is bounded by Santa Monica Boulevard to the north, Corinth Avenue to the east, Iowa Avenue to the south, and Butler Avenue to the west. The Project Site is bisected by Purdue Avenue. As shown in Figure 2, Aerial Photograph of the Project Site and Vicinity, the Project Site, which includes portions of the existing West Los Angeles Civic Center, West Los Angeles Courthouse, West Los Angeles Branch Library, and the West Los Angeles LAPD Maintenance Facility, is irregularly shaped and is divided into two areas generally west and east of Purdue Avenue.

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<sup>12</sup> It is noted that the Project would preserve the front, northernmost façade of the existing Municipal building, the bronze screen (or brise soleil) with glass tiles on the eastern façade of the existing Courthouse building, and the roof of the existing bandstand structure (which would be refurbished and used as part of the new Open Space Bandstand).

<sup>13</sup> The aforementioned floor area calculations do not include the approximately 12,855-square-foot West Los Angeles Branch Library and the approximately 4,000-square-foot LAPD Vehicle Maintenance Facility, which will not be redeveloped, as described above.

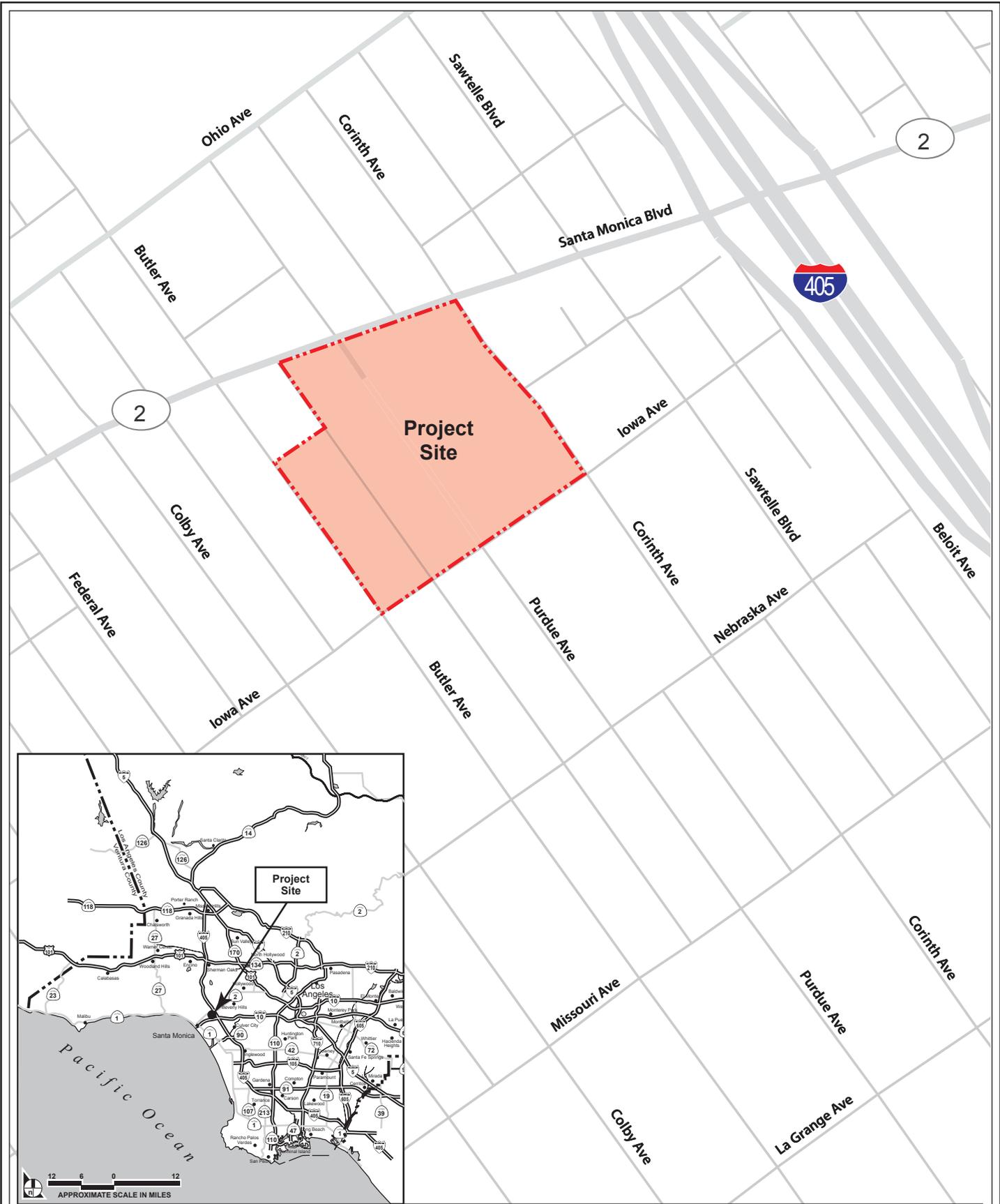
**Table 1  
Summary of Zoning and CEQA Analysis Floor Area**

Property	Floor Area	FAR
<b>County Property</b>		
Zoning Floor Area	459,189 sf	3.5:1
CEQA Analysis Floor Area	491,869 sf <sup>a</sup>	3.75:1
Buildable Area <sup>b</sup>	131,246 sf	
<b>City Property</b>		
Zoning Floor Area	638,879 sf	3.17
CEQA Analysis Floor Area	642,573 sf <sup>c</sup>	3.19:1
Buildable Area <sup>b</sup>	201,253 sf	
<b>Project Site (County Property + City Property)</b>		
Zoning Floor Area	1,098,068 sf	3.3:1
CEQA Analysis Floor Area	1,134,442 sf <sup>d</sup>	3.41:1
Buildable Area <sup>b</sup>	332,499 sf	
<b>Project Site (County Property + City Property + Library and LAPD Parcels)</b>		
	1,151,297 sf <sup>e</sup>	
<hr/> sf = square feet <sup>a</sup> Includes the 27,000-square-foot below grade retail space and 5,680 square feet of outdoor dining areas, which would not count as floor area for zoning purposes under the County's zoning code. <sup>b</sup> This reflects the area post-merger/dedication for the City Property and post-vacation/dedication for the County Property. <sup>c</sup> Includes 3,694 square feet of outdoor dining areas, which would not count as floor area for zoning purposes under the City's zoning code. <sup>d</sup> Includes the 27,000-square-foot below grade retail space and a total of 9,374 square feet of outdoor dining areas, which would not count as floor area for zoning purposes under the County's and City's zoning codes. <sup>e</sup> Includes the CEQA Analysis Floor Area of 1,134,442 square feet plus the approximately 12,855-square-foot West Los Angeles Branch Library and the approximately 4,000-square-foot LAPD Vehicle Maintenance Facility that will remain. Source: Eystone Environmental, 2022.		

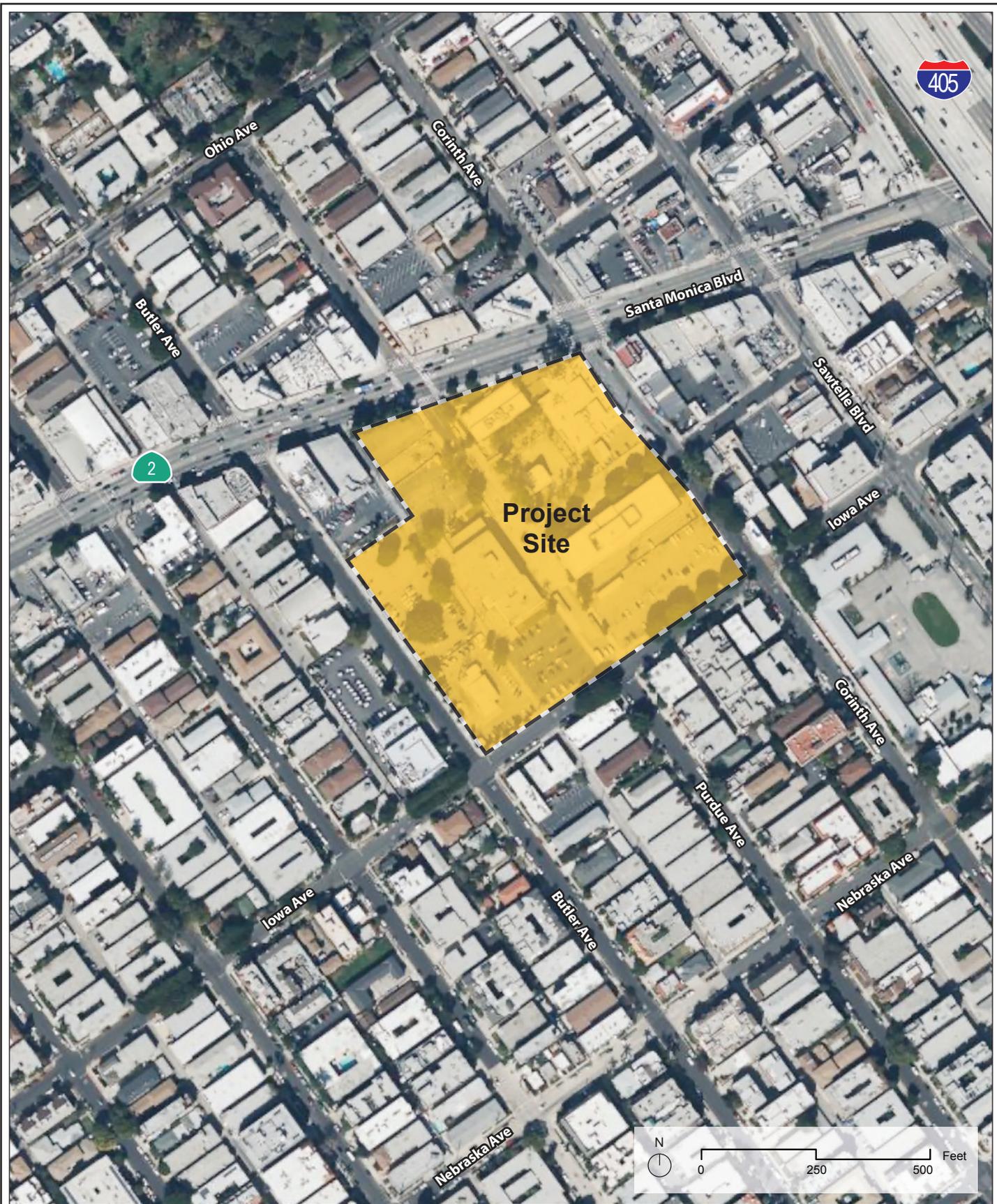
The County Property, located west of Purdue Avenue, consists of six parcels and includes property addresses: 11400, 11404, 11406, 11408, 11410, and 11412 West Santa Monica Boulevard; 1633, 1641, and 1647 South Purdue Avenue; and 1644 South Butler Avenue.<sup>14</sup> The City Property consists of two parcels and includes property addresses: 11332, 11338, 11342, and 11344 West Santa Monica Boulevard; 1619, 1645, and 1667 South Corinth Avenue; 11342, 11343, 11345, 11346, and 11358 West Idaho Avenue; 11343, 11347, 11353, 11359, 11407, and 11409, West Iowa Avenue; and 1640, 1652, 1653, and 1657 South Purdue Avenue.<sup>15</sup> The Library and LAPD Parcels consist

<sup>14</sup> Assessor's Parcel Numbers (APNs) 4261-011-915, -910, -909, -908, -913, and -914.

<sup>15</sup> APNs 4261-010-908 (portion) and 4261-011-911.



**Figure 1**  
Project Location Map



**Figure 2**

Aerial Photograph of the Project Site and Vicinity

of two parcels (including a portion of a parcel associated with the City Property) and includes property addresses: 1656, 1660, and 1666 South Butler Avenue; 11421 West Iowa Avenue; and 11360 West Santa Monica Boulevard.<sup>16</sup> No redevelopment is proposed on the Library and LAPD Parcels.

The Project Site is located within the West Los Angeles Community Plan area of the City. However, as explained in Section 1, Introduction, of this Initial Study, the County is exercising sovereign immunity over the County Property and, therefore, the County Property is not subject to the City's or the County's zoning regulations. The County will require ministerial site plan review to develop the portion of the Project on the County Property. As detailed further below in Section 3.4, Requested Permits and Approvals, of this Initial Study, the County will require the following agreements with the Applicant for development on the County Property: option agreements, ground leases, and Reciprocal Easement Agreement(s) between the County, City, and the Applicant. The City has land use jurisdiction over the City Property and will require approval of discretionary entitlements to develop the portion of the Project on the City Property. The City will also require various agreements with the Applicant for development on the City Property, including: Disposition and Development Agreements, ground leases, a construction agreement, and Reciprocal Easement Agreement(s) between the City and the Applicant. The County and City may also require the Applicant to enter into additional agreements to develop the Project on the Project Site.

Regional access to the Project Site is provided by the San Diego Freeway (I-405), located approximately 0.25-mile east of the Project Site. Local access to the Project Site is provided via several local and collector streets and boulevards, including Santa Monica Boulevard, Iowa Avenue, Butler Avenue, Corinth Avenue, and Purdue Avenue.

### **3.2.2 Project Site Background**

The Project Site is currently occupied by the former West Los Angeles Courthouse building, several City municipal services, community-serving spaces, the West Los Angeles Branch Library, and an LAPD Vehicle Maintenance Facility. The West Los Angeles Courthouse building has been closed since 2013. The County Property is currently owned by the Judicial Council of California. In 2018, the State of California passed Assembly Bill 2309, granting the County the first right to purchase the County Property, which is also memorialized in Lease Agreement with Option to Purchase between the Judicial Council of California and the County, dated February 21, 2020.

The City owns the City Property, which includes the West Los Angeles Municipal Building, the Felicia Mahood Multipurpose Center, and the open space bandstand (Open Space Bandstand). The City also owns the West Los Angeles Regional Branch Library (i.e., the Library) on the Project Site located at 11360 Santa Monica Boulevard at the corner of Santa Monica Boulevard east of Purdue Avenue (i.e., the Library Parcel). The Library will remain in its existing condition. While the Library's floor area and the Library Parcel's lot area would not be counted toward the Project's maximum allowable development envelope (e.g., floor area, density, etc.), the Library Parcel is considered part of the Project and Project Site because the Project is proposing to subdivide the Library Parcel from the balance of the City Property.

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<sup>16</sup> APNs 4261-010-908 (portion) and 4261-011-912.

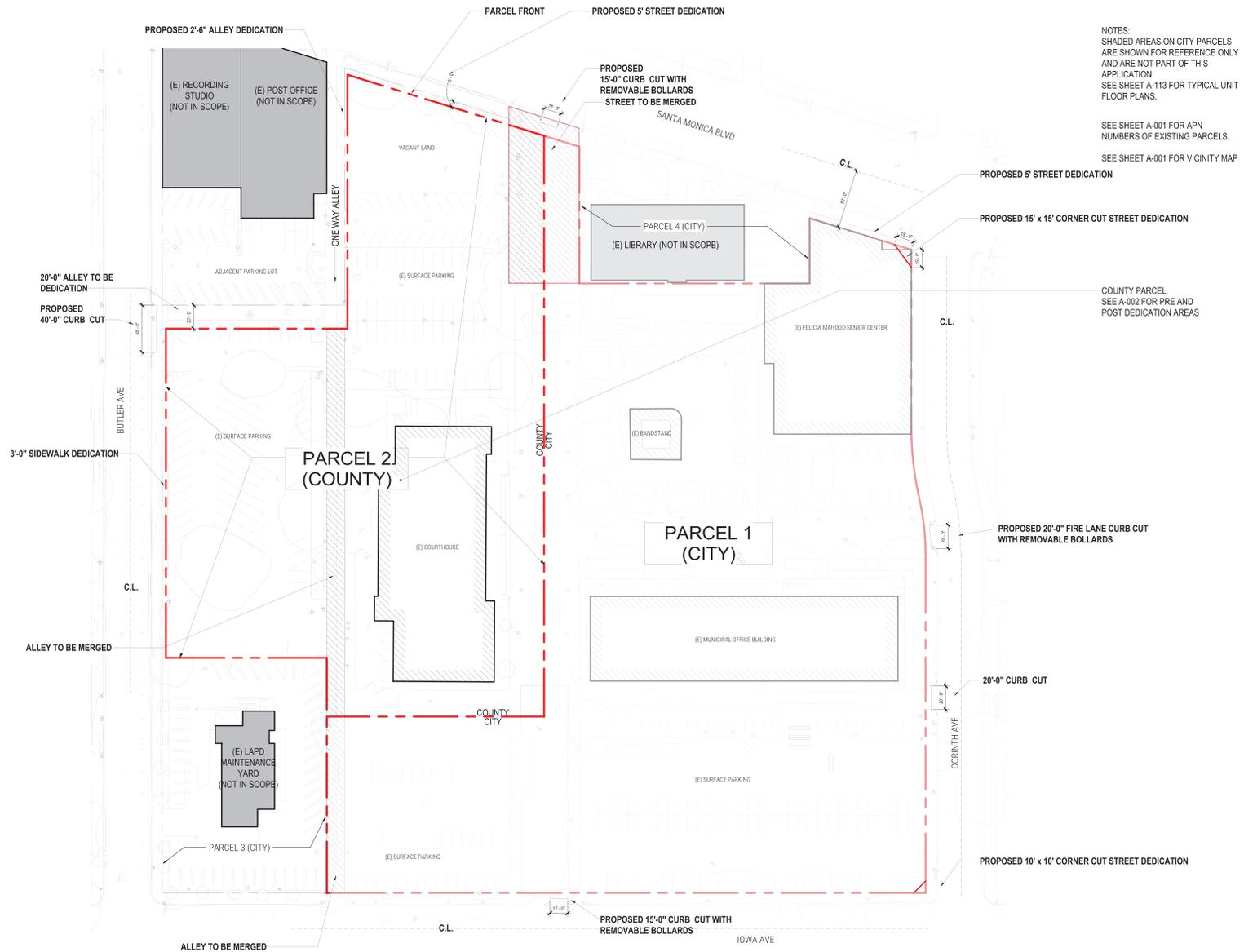
Furthermore, the City owns the LAPD garage and vehicle support maintenance facility located at the northeast corner of Butler Avenue and Iowa Avenue at 1656 South Butler Avenue, associated with APN 4261-011-912 (i.e., the LAPD Parcel). These City services have been in operation since 1968, will remain as-is, and continue to serve LAPD functions. However, the LAPD Parcel is also considered part of the Project and Project Site because the Project is proposing to merge public right-of-way adjacent to the LAPD Parcel with the Project Site and to realign the property lines. Nonetheless, the LAPD Parcel's lot area or the LAPD garage and maintenance facility's floor area are not counted towards the Project's maximum allowable development envelope (e.g., floor area, density, etc.) since, similar to the Library, the LAPD Parcel will be operated independently from the balance of the Project Site, continue to serve City functions, and will not be redeveloped.

### **3.2.3 Existing Conditions**

As shown on the existing site plan provided in Figure 3, Existing Plot Plan—County Property, on page 16, the County Property is currently occupied by the former 36,995-square-foot West Los Angeles Courthouse building, which was built in 1958 and has been closed since 2013, and associated surface parking lots as well as a vacant site along Santa Monica Boulevard and Purdue Avenue (to the east). The County Property is located within the West Los Angeles Community Plan Area of the City and has a Public Facilities General Plan land use designation with a corresponding PF-1XL zone designation (Public Facilities, Height District 1XL). However, as explained in Section 1, Introduction, of this Initial Study, the County will exercise sovereign immunity over the County Property; therefore, the County Property is not subject to the City's or the County's zoning regulations. The County will require ministerial site plan review to develop the portion of the Project on the County Property.

As shown on the existing site plan provided in Figure 4, Existing Plot Plan—City Property, on page 17, the City Property is currently occupied by the West Los Angeles Municipal Building (built in 1960), the Felicia Mahood Multipurpose Center, the Open Space Bandstand, and associated surface parking lots. The City Property is located within the West Los Angeles Community Plan area and has a Public Facilities General Plan land use designation. The City Property is zoned PF-1XL (Public Facilities, Height District 1XL). Pursuant to the City of Los Angeles Municipal Code (LAMC), the PF Zone permits a wide array of land uses including government buildings, schools, public health facilities, and any joint public and private development uses permitted in a property's most restrictive adjoining zones (subject to obtaining the respective approvals from the City). Height District 1XL specifies a building height limit of two stories and 30 feet and allows up to a 3:1 FAR for property located in the PF zone.

The City Property is also located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation Specific Plan, which helps mitigate the cumulative impacts of development by requiring new development to contribute a fair share towards completing needed regional transportation improvements, in addition to completing required project specific mitigations through an administrative review process. The City Property is also identified as being located in a Transit Priority Area (TPA), as defined by Senate Bill (SB) 743 because it is located within 0.5-mile of an existing "major transit stop", the intersection of Sepulveda Boulevard and Santa Monica Boulevard. This "major transit stop" is served by Los Angeles County Metropolitan Transportation Authority (Metro) Line 4, Culver CityBus Lines 6/6R, and Santa Monica Big Blue Bus Line 1, which each have frequencies of service intervals of 15 minutes or less during the morning and afternoon peak commute



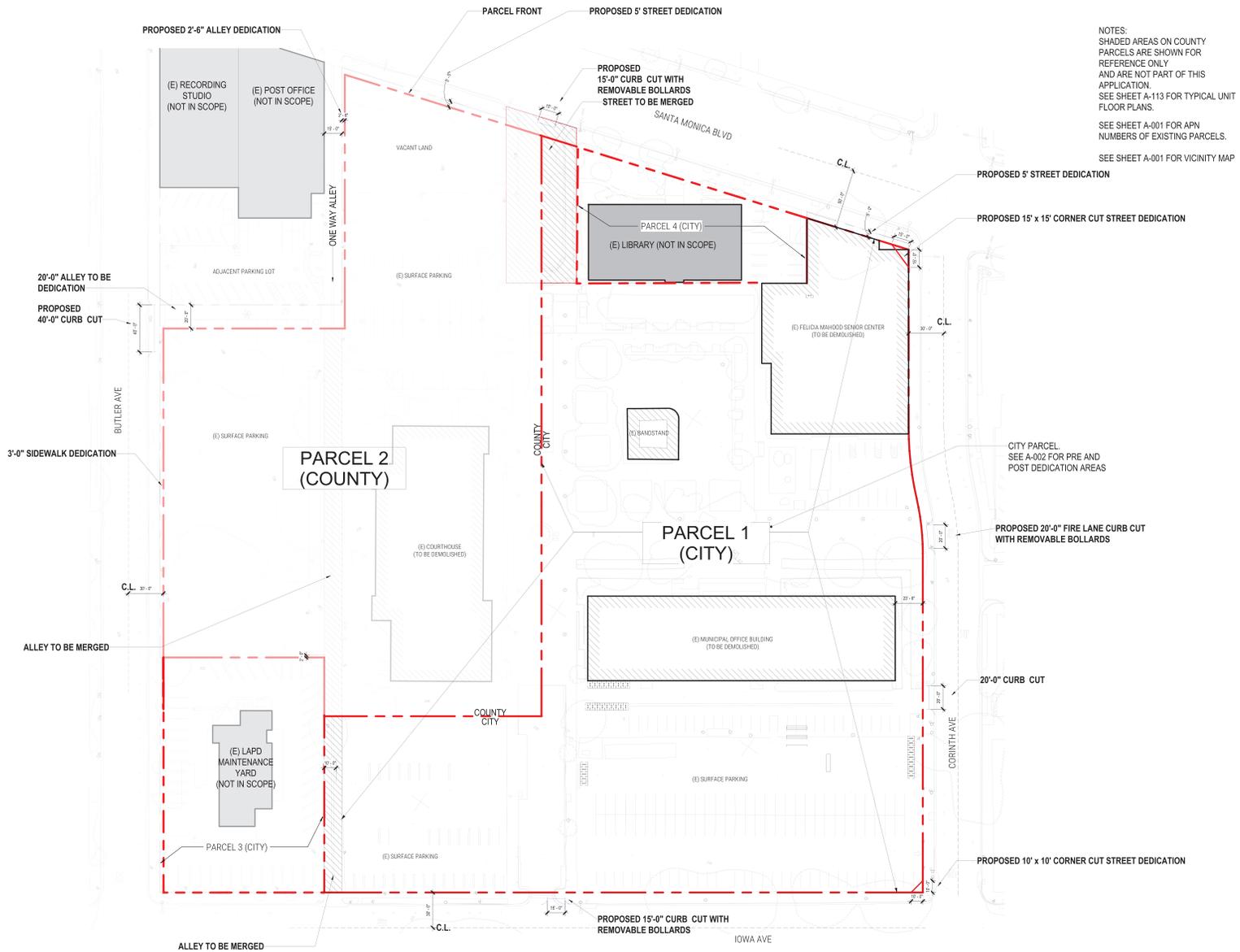
NOTES:  
 SHADED AREAS ON CITY PARCELS  
 ARE SHOWN FOR REFERENCE ONLY  
 AND ARE NOT PART OF THIS  
 APPLICATION.  
 SEE SHEET A-113 FOR TYPICAL UNIT  
 FLOOR PLANS.

SEE SHEET A-001 FOR APN  
 NUMBERS OF EXISTING PARCELS.  
 SEE SHEET A-001 FOR VICINITY MAP

COUNTY PARCEL.  
 SEE A-002 FOR PRE AND  
 POST DEDICATION AREAS

**Figure 3**

**Existing Plot Plan—County Property**



**Figure 4**  
 Existing Plot Plan—City Property

periods.<sup>17</sup> The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a transit priority area, as defined in the Zoning Information File (ZI) 2452.<sup>18</sup>

Furthermore, the Library and LAPD Parcels, which have the same land use and zoning as the City Property, are currently occupied by the West Los Angeles Regional Branch Library (built in 1956) and the LAPD garage and vehicle support maintenance facility, which will not be redeveloped and continue to serve City functions.

The Project Site is relatively flat with limited landscaping. Existing landscaping within and adjacent to the Project Site includes grass areas and 97 trees consisting of 82 on-site trees, 14 right-of-way trees, and one off-site tree with a canopy that overhangs the Project Site.<sup>19</sup> Specifically, the County Property contains 27 on-site trees and one off-site tree with an overhanging canopy. The City Property contains 69 trees, including 55 on-site trees and 14 right-of-way trees. Moreover, of the trees inventoried, one on-site tree is located on the boundary line between the County Property and the City Property. None of the trees identified within the Project Site and the right-of-way are identified as protected California native tree species that are of a qualifying size. Specifically, none of the 55 on-site trees on the City Property are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.<sup>20</sup> Also, since there are no native oaks on the County Property or whose canopies overhang the County Property, the Los Angeles County Oak Tree Ordinance No. 2019-0004 does not apply since this ordinance protects only native oaks with trunk diameters of 8 inches in diameter or greater. Additionally, the 14 street trees within the public rights-of-way surrounding the Project Site are not species that are protected by the LAMC.<sup>21</sup>

Vehicular and pedestrian access to the Project Site is currently available along Santa Monica Boulevard, Corinth Avenue, Purdue Avenue, Iowa Avenue, and Butler Avenue. The Project Site is also well served by a variety of public transit options along Santa Monica Boulevard provided by the Los Angeles County Metropolitan Transit Authority (Metro). Specifically, transit options within 0.5-miles of the Project Site include the Metro Line 4, Culver CityBus Lines 6/6R, and Santa Monica's Big Blue Bus (BBB) Lines BBB1 and BBB17.

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<sup>17</sup> SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a TPA shall not be considered significant impacts on the environment." TPAs are areas within 0.5 mile of a major transit stop that are existing or planned. Thus, in accordance with SB 743, the Project's aesthetic and parking impacts are not considered significant as a matter of law.

<sup>18</sup> In accordance with the City's ZI No. 2452, the Project's aesthetic and parking impacts are not considered significant as a matter of law.

<sup>19</sup> Carlberg Associates, City of Los Angeles Tree Inventory Report—West LA Commons, 11332 W. Santa Monica Boulevard, Los Angeles, California 90025, December 21, 2021. See Appendix IS-1 of this IS.

<sup>20</sup> Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

<sup>21</sup> The Project would not remove any existing trees from the Library and LAPD Parcels since these parcels will not be redeveloped.

### 3.2.4 Surrounding Land Uses

The area surrounding the Project Site is considered an urbanized area<sup>22</sup> and includes a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public facilities/institutional uses. Properties to the north along Santa Monica Boulevard have Neighborhood Commercial and Medium Residential land use designations and are zoned C2-1VL and [Q]R3-1. These parcels are developed with low-rise, single-story commercial buildings with community-serving uses (including but not limited to retail and restaurant uses) and a mid-rise, six-story mixed-use multi-family residential and commercial building. Properties to the east of the Project Site along Corinth Avenue have a Neighborhood Commercial land use designation and are zoned C2-1, C2-1VL, and (Q)RAS4-1VL. These properties are developed with low- to mid-rise residential and commercial buildings, a single-story commercial/restaurant building, and a mid-rise commercial office building. Properties to the south of the Project Site along Iowa Avenue have a Medium Residential land use designation and are zoned [Q]R3-1. These properties are developed with multi-family residential uses within low-rise buildings and a low-rise church building. Properties to the west of the Project Site along Butler Avenue have Public Facilities, Medium Residential, and Neighborhood Commercial land use designations and are zone PF-1XL, [Q]R3-1, and C2-1VL. These properties include low- to mid-rise municipal, institutional, residential, and commercial buildings, including an LAPD station, several low- to mid-rise multi-family residential buildings, a church, and mid-rise commercial buildings. Table 2, Surrounding Existing Uses, Zoning, Land Use Designation Within a 500-Foot Radius, below, provides a summary of surrounding existing uses, zoning, and land use designations within a 500-foot radius of the Project Site.

**Table 2  
Surrounding Existing Uses, Zoning, Land Use Designation Within a 500-Foot Radius**

<b>Location</b>	<b>Land Use Designation (City)</b>	<b>Zoning (City)</b>	<b>Land Use</b>
North	Neighborhood Commercial and Medium Residential	C2-1VL and [Q]R3-1	Residential and commercial (retail and restaurant) uses
South	Medium Residential	[Q]R3-1	Residential and institutional uses
East	Neighborhood Commercial	C2-1, C2-1VL, and (Q)RAS4-1VL	Residential, commercial (restaurant), and office uses
West	Public Facilities, Medium Residential, and Neighborhood Commercial	PF-1XL, [Q]R3-1, and C2-1VL	Residential, municipal, institutional, residential, and commercial uses
<hr/> <p><i>Source: Eyestone Environmental, 2022.</i></p>			

<sup>22</sup> Defined by CEQA Statute Section 21071.

## 3.3 DESCRIPTION OF PROJECT

### 3.3.1 Project Overview

The Project includes the redevelopment of the existing West Los Angeles Civic Center and West Los Angeles Courthouse with a new mixed-use development consisting of residential, neighborhood-serving commercial (retail/restaurant), municipal office, and senior community center uses. As summarized in Table 3, Summary of Existing and Proposed Floor Area, on page 21, the Project would provide 926 housing units, including 495 market-rate and 431 income-restricted housing units, 70,965 square feet of neighborhood-serving commercial (retail/restaurant) uses,<sup>23</sup> 76,341 square feet of municipal office uses, and 25,846 square feet of senior community center uses (Felicia Mahood Senior Center). With inclusion of the existing Library and LAPD buildings that will remain, the Project would have a total floor area of 1,151,297 square feet.

As illustrated in the Project overview diagram provided in Figure 5, Project Overview, on page 22, the proposed uses would be located within nine new structures ranging from two- to eight-stories with approximate heights from 43 feet to 100 feet to the top of the building (58 feet to 109 feet to the top of the rooftop mechanical equipment). A total of 1,563 vehicle parking spaces would be provided within a three-level subterranean parking garage. The Project would also include approximately 193,000 square feet of private, common, and publicly accessible open space throughout the Project Site, of which 112,382 square feet would comply with the LAMC definition of open space.

Other than the Library and LAPD Parcels, the Project would remove or replace the existing uses within the Project Site, including removing the approximately 36,995-square-foot West Los Angeles Courthouse building within the County Property and replacing the approximately 41,343-square-foot Municipal building<sup>24</sup> and the 16,800-square-foot Felicia Mahood Multipurpose Center within the City Property. The approximately 12,855-square-foot West Los Angeles Branch Library and the approximately 4,000-square-foot LAPD Vehicle Maintenance Facility on the Library and LAPD Parcels would not be redeveloped and will continue serving library and LAPD functions.

Upon completion, the Project would provide a total floor area of approximately 1,134,442 square feet within the Project Site, including 491,869 square feet of floor area with a FAR of 3.75:1 on the County Property and 642,573 square feet of floor area with a FAR of 3.19:1 on the City Property. Combined, the Project would have a FAR of approximately 3.41:1.<sup>25</sup> With inclusion of the existing Library and LAPD buildings that will remain, the Project would have a total floor area of 1,151,297 square feet.

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<sup>23</sup> For conservative environmental analysis purposes, this Initial Study assumes approximately 9,374 square feet of outdoor eating areas adjacent to ground floor restaurant spaces and the Felicia Mahood Senior Center, as well as a proposed approximately 27,000-square-foot below grade retail space would count as floor area, resulting in a total commercial floor area of 70,965 square feet and 25,846 square feet of senior community center uses. Without consideration of these areas as floor area, the commercial floor area per the zoning code would be 36,569 square feet and the senior center floor area would be 23,846 square feet.

<sup>24</sup> It is noted that the Project would preserve the front, northernmost façade of the existing Municipal building, the bronze screen (or brise soleil) with glass tiles on the eastern façade of the existing Courthouse building, and the roof of the existing bandstand structure (which would be refurbished and used as part of the new Open Space Bandstand).

<sup>25</sup> These floor area calculations do not include the approximately 12,855-square-foot West Los Angeles Branch Library and the approximately 4,000-square-foot LAPD Vehicle Maintenance Facility on the Library and LAPD Parcels that would remain and not be redeveloped.

**Table 3  
Summary of Existing and Proposed Floor Area**

Land Use	Existing	Proposed Demolition	Proposed Construction	Net New Floor Area	Total Floor Area On-Site
Residential	0 sf	0 sf	961,290 sf 926 du	961,290 sf 926 du	961,290 sf 926 du
Commercial	0 sf	0 sf	70,965 sf	70,965 sf	70,965 sf
Municipal Office	41,343 sf	41,343 sf	76,341 sf	34,998 sf	76,341 sf
Senior Center/Municipal	53,795 sf	53,795 sf	25,846 sf	(27,949) sf	25,846 sf
<b>Total</b>	<b>95,138 sf</b>	<b>95,138 sf</b>	<b>1,134,442 sf</b>	<b>1,039,304 sf</b>	<b>1,134,442 sf</b>
Library	12,855 sf	0 sf	0 sf	0 sf	12,855 sf
LAPD Maintenance Facility	4,000 sf	0 sf	0 sf	0 sf	4,000 sf
<b>Total + Library and LAPD Parcels</b>	<b>111,993 sf</b>	<b>95,138 sf</b>	<b>1,134,442 sf</b>	<b>1,039,304 sf</b>	<b>1,151,297 sf</b>

sf = square feet

du = dwelling units

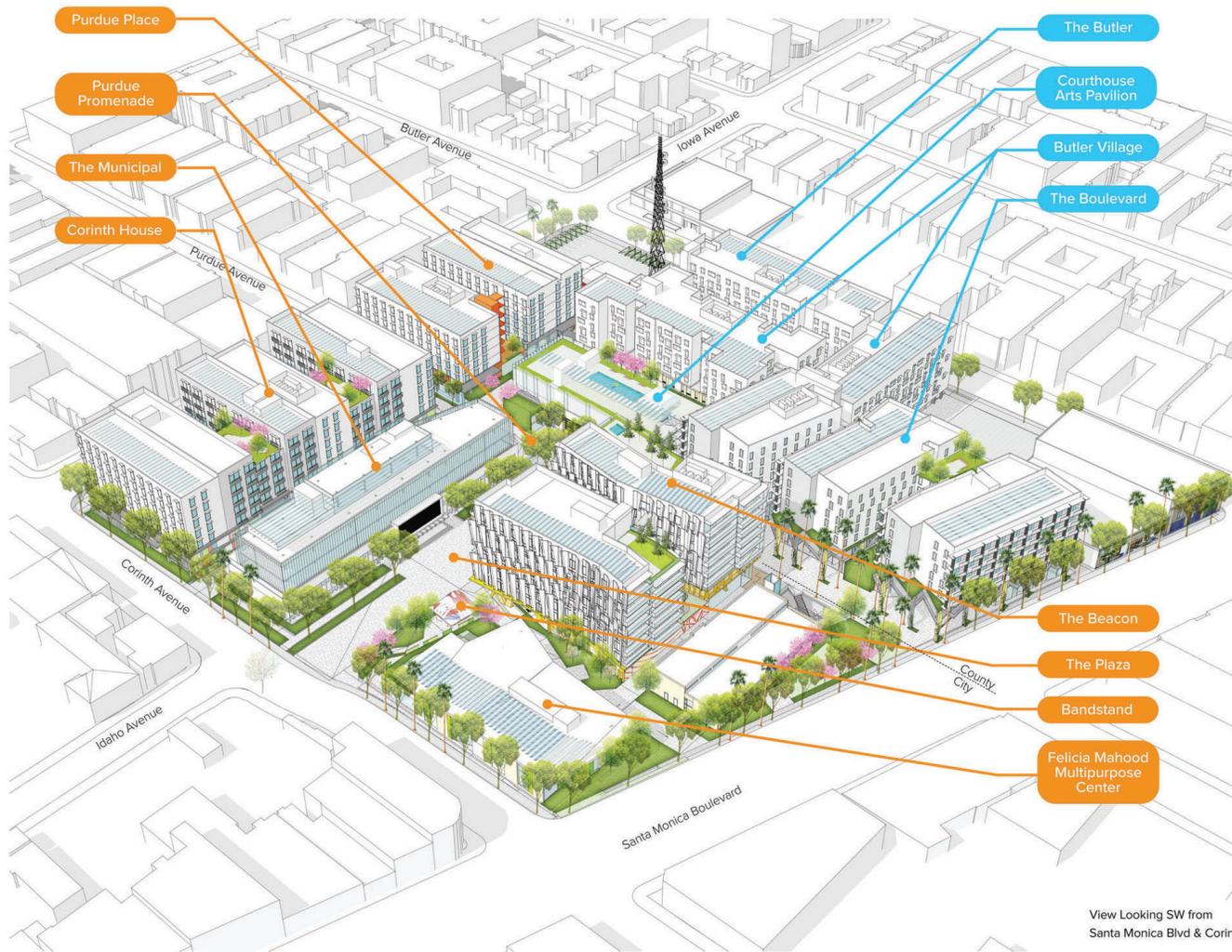
( ) = negative value

*Note: Square footage for the County Property is calculated pursuant to the County definition of floor area for the purpose of calculating FAR. In accordance with Los Angeles County Code (LACC) Section 22.04.050(E), floor area is defined as “the total building area, measured from the exterior of the building walls, of all floors of a building expressed in square feet,” but “shall exclude: (i) Parking structures, garages, carports, or other areas designated for parking and loading, or vehicular access to parking and loading spaces, because these structures shall be counted separately; (ii) Unenclosed exterior balconies, decks, porches, courts, and stairs; (iii) Buildings or structures for housing building operating equipment or machinery; (iv) Cellars; and (v) Attics, if not a habitable room as defined by Title 26 (Building Code) of the County Code.” Square footage for the City Property 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.”*

*However, while below-grade uses and outdoor dining areas adjacent to ground floor restaurants within the County Property [pursuant to LACC Section 22.04.050(E)] and outdoor uncovered dining areas adjacent to ground floor restaurants and senior center within the City Property [pursuant to LAMC Section 12.03] are not considered floor area for zoning purposes, they are nevertheless counted towards the Project’s provided commercial and senior center floor area for a conservative environmental analysis. Without consideration of these areas as floor area, the commercial floor area per the zoning code would be 36,569 square feet and the senior center floor area would be 23,868 square feet.*

Source: AC Martin, 2022.

Conceptual site plans of the development proposed on the County Property and the City Property are provided in Figure 6, Conceptual Site Plan—County Property, and Figure 7, Conceptual Site Plan—City Property, on pages 23 and 24, respectively. As shown therein, the Project would include the construction of nine new buildings on the Project Site. Specifically, the Project would include structures to be known as the Boulevard, the Butler, Butler Village, and the Courthouse Arts Pavilion



**The Plaza (Community Core)**

Public Plaza, Bandstand and planted terraces, fronting the Historic Municipal and Courthouse Arts Pavilion

**Purdue Promenade (Flex-Use Space)**

A through-block, tree-lined walk with cafes, weekly Farmers Market, and recreational amenities

**Los Angeles County:**

**The Boulevard**

7 stories, 158 units of market-rate and moderate-income family housing with ground level retail and below grade commercial

**The Butler**

7 stories, 100 units of affordable senior and supportive housing and ground floor residential amenity

**Butler Village**

7 stories, 158 units of affordable and moderate-income family and supportive housing

**Courthouse Arts Pavilion**

5 stories, 18 units of market-rate units with community arts workshop / retail and residential rooftop amenities

**City of Los Angeles:**

**Bandstand**

Refurbished venue for public Plaza events

**The Beacon**

8 stories, 121 units of market-rate and moderate-income family housing and ground level retail / restaurant

**Purdue Place**

7 stories, 127 units of affordable and moderate-income family and supportive housing

**Corinth House**

8 stories, 244 units of market-rate and moderate-income family housing with residential amenities

**Felicia Mahood Multipurpose Center**

2 stories, Ground and second floor senior community spaces with second floor garden and terrace

**The Municipal**

5 stories, Municipal offices with plaza level cafe

View Looking SW from Santa Monica Blvd & Corinth

**Figure 5**  
Project Overview



**Figure 6**  
 Conceptual Site Plan—County Property



**Figure 7**  
Conceptual Site Plan—City Property

buildings within the County Property and the Beacon, Purdue Place, the Corinth House, the Felicia Mahood Senior Center, and the Municipal buildings within the City Property.

Provided below is a detailed description of each of the buildings proposed within the County Property and the City Property. In addition, Table 4, Summary of Proposed Floor Area within the County Property and City Property, on page 26 summarizes the development proposed within the County Property and the City Property.

### **a. County Property**

As shown in Figure 6, Conceptual Site Plan—County Property, and summarized in Table 3, Summary of Existing and Proposed Floor Area, four new buildings would be constructed within the County Property, including the Boulevard building, the Butler building, Butler Village, and the Courthouse Arts Pavilion.

The Boulevard building is a mixed-use residential and commercial building that would be situated along the northern portion of the Project Site along Santa Monica Boulevard and adjacent to the existing West Los Angeles Regional Branch Library. The Boulevard building would include approximately 158 total units, including 144 market-rate residential units and 14 income-restricted housing units. The Boulevard building would comprise approximately 216,879 square feet of floor area, including 162,447 square feet of residential floor area and approximately 54,432 square feet of retail/restaurant uses (includes 21,752 square feet of proposed neighborhood-serving commercial uses at grade, a 27,000-square-foot below grade retail space, and 5,680 square feet of outdoor dining areas adjacent to the ground floor commercial uses). The Boulevard would also include approximately 15,315 square feet of open space, comprised of approximately 13,995 square feet of private recreational open space for residents and approximately 1,320 square feet of publicly accessible open space. The Boulevard building would comprise 7 levels with an approximate height of 89 feet to the top of the building (93 feet to the top of parapet and 98 feet to the top of the rooftop mechanical equipment).

The Butler building would be situated along the western portion of the Project Site along Butler Avenue. The Butler building would include 99 senior citizen housing units with income restrictions and one manager residential unit. The Butler building would comprise approximately 78,627 square feet of floor area. The Butler would also include approximately 8,812 square feet of open space, comprised of approximately 7,862 square feet of private recreational open space for residents and approximately 950 square feet of publicly accessible open space. The Butler building would comprise seven levels with an approximate height of 83 feet to the top of the building (87 feet to the top of parapet and 92 feet to the top of the rooftop mechanical equipment).

The Butler Village would include two interconnected structures (North and South) identified herein as one building that would be situated in the center of the County Property (the North Butler Village building) and in between The Butler and Courthouse Arts Pavilion buildings (the South Butler Village building). The Butler Village would include approximately 158 income-restricted housing units and comprise approximately 161,149 square feet of residential floor area. The Butler Village would also include approximately 14,615 square feet of open space, comprised of approximately 10,865 square feet of private recreational open space for residents and approximately 3,750 square feet of publicly accessible open space. The Butler Village would comprise seven levels with an approximate height

**Table 4**  
**Summary of Proposed Floor Area within the County Property and City Property**

Building	Land Uses				Total
	Residential	Neighborhood-Serving Commercial (Retail/Restaurant)	Senior/Community Center	Municipal Office	
<b>County Property</b>					
The Boulevard	162,447 sf 158 du	54,432 sf <sup>a</sup>	0 sf	0 sf	216,879 sf 158 du
The Butler	78,627 sf 100 du	0 sf	0 sf	0 sf	78,627 sf 100 du
Butler Village	161,149 sf 158 du	0 sf	0 sf	0 sf	161,149 sf 158 du
Courthouse Arts Pavilion	32,161 sf 18 du	3,053 sf	0 sf	0 sf	35,214 sf 18 du
<b>Total</b>	<b>434,384 sf 434 du</b>	<b>57,485 sf</b>	<b>0 sf</b>	<b>0 sf</b>	<b>491,869 sf 434 du</b>
<b>City Property</b>					
The Beacon	154,655 121 du	10,417 sf	0 sf	0 sf	165,072 sf 121 du
Purdue Place	126,953 sf 127 du	0 sf	0 sf	0 sf	126,953 sf 127 du
Corinth House	245,298 sf 244 du	0 sf	0 sf	0 sf	245,298 sf 244 du
Felicia Mahood Senior Center	0 sf	0 sf	25,846 sf <sup>b</sup>	0 sf	25,846 sf
The Municipal	0 sf	3,063 sf <sup>c</sup>	0 sf	76,341 sf	79,404 sf
<b>Total</b>	<b>526,906 sf 492 du</b>	<b>13,480 sf</b>	<b>25,846 sf</b>	<b>76,341 sf</b>	<b>642,573 sf 492 du</b>
<b>Total (County and City)</b>	<b>961,290 sf 926 du</b>	<b>70,965 sf</b>	<b>25,846 sf</b>	<b>76,341 sf</b>	<b>1,134,442 sf 926 du</b>

du = dwelling units

sf = square feet

*Note: Square footage for the County Property is calculated pursuant to the County definition of floor area for the purpose of calculating FAR. In accordance with Los Angeles County Code (LACC) Section 22.04.050(E), floor area is defined as "the total building area, measured from the exterior of the building walls, of all floors of a building expressed in square feet," but "shall exclude: (i) Parking structures, garages, carports, or other areas designated for parking and loading, or vehicular access to parking and loading spaces, because these structures shall be counted separately; (ii) Unenclosed exterior balconies, decks, porches, courts, and stairs; (iii) Buildings or structures for housing building operating equipment or machinery; (iv) Cellars; and (v) Attics, if not a habitable room as defined by Title 26 (Building Code) of the County Code. Square footage for the City Property 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."*

*However, while below-grade uses and outdoor dining areas adjacent to ground floor restaurants within the County Property [pursuant to LACC Section 22.04.050(E)] and outdoor uncovered dining areas adjacent to ground floor restaurants and senior center uses within the City Property [pursuant to LAMC Section 12.03] are not considered floor area for zoning purposes, they are nevertheless counted towards the Project's provided commercial and senior center floor area for a conservative environmental analysis. Without consideration of these areas as floor area, the commercial floor area per the zoning code would be 36,569 square feet and the senior center floor area would be 23,868 square feet.*

**Table 4 (Continued)**  
**Summary of Proposed Floor Area within the County Property and City Property**

Building	Land Uses			Total
	Residential	Neighborhood-Serving Commercial (Retail/Restaurant)	Senior/Community Center	
<sup>a</sup> Includes 21,752 square feet of proposed neighborhood-serving commercial uses at grade, a 27,000-square-foot below grade retail space, and 5,680 square feet of outdoor dining areas adjacent to the ground floor commercial uses. <sup>b</sup> Includes 1,978 square feet of outdoor uncovered dining areas adjacent to the Felicia Mahood Senior Center. <sup>c</sup> Includes 1,347 square feet of proposed neighborhood-serving commercial uses and 1,716 square feet of outdoor uncovered dining areas adjacent to the ground floor commercial uses. Source: AC Martin, 2022.				

of 83 feet to the top of the building (87 feet to the top of parapet and 92 feet to the top of the rooftop mechanical equipment).

The Courthouse Arts Pavilion is a mixed-use residential and commercial building that would be situated in the center of the overall Project Site and in the eastern portion of the County Property. The Courthouse Arts Pavilion would include approximately 18 market-rate residential units and comprise approximately 35,214 square feet of floor area, including 32,161 square feet of residential floor area and approximately 3,053 square feet of retail/restaurant uses. The Courthouse Arts Pavilion would also include approximately 13,392 square feet of private recreational open space for residents. The Courthouse Arts Pavilion would comprise five levels with an approximate height of 66 feet to the top of the building (70 feet to the top of parapet and 75 feet to the top of the rooftop mechanical equipment.)

As provided in Table 3, Summary of Existing and Proposed Floor Area, the Project would include a total of 491,869 square feet of floor area within the County Property, including 434 new residential units and 57,485 square feet of commercial uses. Moreover, the Project within the County Property would include a total of approximately 52,134 square feet of open space, comprised of approximately 46,114 square feet of private recreational open space for residents and approximately 6,020 square feet of publicly accessible open space.

**b. City Property**

As shown in Figure 7, Conceptual Site Plan—City Property, and summarized in Table 3, Summary of Existing and Proposed Floor Area, five new buildings would be constructed within the City Property, including the Beacon building, Purdue Place, Corinth House, the Felicia Mahood Senior Center, and the Municipal building. Within the City Property, the Project would also include a new Open Space Bandstand, which would be used for public performances, including but not limited to musical and theatrical performances and community events, and a publicly accessible plaza that would be used for public events and recreational/leisure purposes. It is intended for the existing roof structure of the current Open Space Bandstand on site to be refurbished and reused.

The Beacon building is a mixed-use residential and commercial building that would be situated along the northern portion of the Project Site immediately south of the existing West Los Angeles Regional

Branch Library. The Beacon building would include approximately 121 total units, including 110 market-rate residential units and 11 income-restricted housing units, and comprise approximately 165,072 square feet of floor area, including 154,655 square feet of residential floor area and approximately 10,417 square feet of retail/restaurant uses. The Beacon would also include approximately 16,062 square feet of open space, comprised of approximately 10,002 square feet of private recreational open space for residents and approximately 6,050 square feet of publicly accessible open space. The Beacon building would comprise eight levels with an approximate height of 100 feet to the top of the building (103 feet to the top of parapet and 109 feet to the top of the rooftop mechanical equipment).

As shown in Figure 7, Conceptual Site Plan—City Property, adjacent to the Beacon building to the east would be the Felicia Mahood Senior Center. The Felicia Mahood Senior Center would be a multi-purpose civic recreational senior community center and would comprise 25,846 square feet (including the 1,978 square feet of outdoor uncovered eating areas adjacent to the ground floor which, as previously discussed, is not considered floor area for zoning purposes, but is nevertheless counted towards the Project's provided floor area for this environmental analysis). The Felicia Mahood Senior Center would be two stories with an approximate height of 43 feet to the top of the building (47 feet to the top of parapet and 58 feet to the top of the rooftop mechanical equipment).

Just south of the Beacon building and the Felicia Mahood Senior Center would be a large public plaza, referred to herein as the "Civic Plaza," which would feature a large flexible area for public events and recreational/leisure purposes. South of the Civic Plaza would be the Municipal building. The Municipal building would be a mixed-use municipal office building with supporting restaurant space comprised of 79,404 square feet of floor area, including 76,341 square feet of municipal office space and 3,063 square feet of ground floor restaurant space (includes 1,347 square feet of proposed neighborhood-serving commercial uses and 1,716 square feet of outdoor uncovered dining areas adjacent to the ground floor commercial uses). The Municipal building would include five levels with an approximate height of 77 feet to the top of the building (81 feet to the top of parapet and 87 feet to the top of the rooftop mechanical equipment). As previously discussed, the Project would preserve the front, northernmost façade of the existing Municipal building.

The Corinth House would be situated along the southern portion of the Project Site, south of the Municipal building, along Iowa Avenue. The Corinth House would include approximately 244 total units, including 223 market-rate residential units and 21 income-restricted housing units, and comprise approximately 245,298 square feet of floor area. The Corinth House would also include approximately 28,061 square feet of open space, comprised of approximately 20,192 square feet of private recreational open space for residents and approximately 7,869 square feet of publicly accessible open space. The Corinth House would comprise eight levels with an approximate height of 89 feet to the top of the building (93 feet to the top of parapet and 98 feet to the top of the rooftop mechanical equipment).

Purdue Place would be situated west of Corinth House, also along the southern portion of the Project Site along Iowa Avenue. Purdue Place would include approximately 127 income-restricted housing units and comprise approximately 126,953 square feet of floor area. The Corinth House would also include approximately 16,125 square feet of open space, comprised of approximately 5,223 square feet of private recreational open space for residents and approximately 10,802 square feet of publicly accessible open space. The building would comprise seven levels with an approximate height of 84

feet to the top of the building (88 feet to the top of parapet and 93 feet to the top of the rooftop mechanical equipment).

Overall, as provided in Table 3, Summary of Existing and Proposed Floor Area, the Project would include a total of 642,573 square feet of floor area within the City Property, including 492 new residential units, 13,480 square feet of commercial uses, 76,341 square feet of municipal office space, and 25,846 square feet of senior community center uses. Moreover, the Project within the City Property would include approximately 60,248 square feet of open space as defined by the LAMC, comprised of approximately 35,527 square feet of private recreational open space for residents and approximately 24,721 square feet of publicly accessible open space.

### **3.3.2 Design and Architecture**

The Project would be designed to strengthen the neighborhood character and to retain and enhance the Project's Site's evolving civic center concept initiated in the 1920s and expanded in the 1950s and 1960s. The open design and presence of Purdue Paseo and the central alley between the Municipal building and Civic Plaza would encourage walking along and through the Project Site, thereby providing linkages to adjacent uses. The buildings would be designed to sensitively transition on all sides and would respond to the neighborhood context of adjacent commercial corridors, police buildings, and both existing and future residential structures. All buildings within the Project would feature high-quality design and finishes.

As part of the Project, the existing Open Space Bandstand would be rebuilt and reoriented within the public Civic Plaza to accommodate larger audiences and provide better orientation such that the audience would avoid having to face the sun during performances. New buildings would be designed to enhance appreciation of both old and new structures by demonstrating sensitivity to adjacent building heights; appropriate additions that form a design "dialogue" between old and new; and new architecture and site design that elevate and focus appreciation of the site's history and spatial qualities. The Project would frame the existing West Los Angeles Regional Branch Library with new landscaping to highlight a building that has historically been part of the overall compound of civic structures.

Building materials that are proposed vary by structure and would include textured concrete panels, profiled metal siding, smooth acrylic plaster, cement fiber board and batten, as well as ornamental metal for gates and fences. The Project would also feature a variety of metal sunshade devices made from perforated and expanded metals. Paving materials would include seeded aggregate and colored concrete and unit pavers. The Project would maximize open space and landscape opportunities and would provide significant public open space via a central Civic Plaza surrounded with active uses.

### **3.3.3 Historic Preservation**

The Project proposes to preserve the front, northernmost façade of the existing Municipal building, the bronze screen (or brise soleil) with glass tiles on the eastern façade of the existing Courthouse building, as well as the roof of the existing bandstand structure (which would be refurbished and used as part of the new Open Space Bandstand). Additionally, the Project includes the preparation of a Historic Interpretive Plan, which would provide general guidance for the creation of a historic interpretive program at the Project Site. The interpretive program would present historic narrative,

photographs, and other materials to communicate the development history and historic significance of the West Los Angeles Civic Center. This may include, but is not limited to information displays, signage and public access to digital information.

### 3.3.4 Open Space and Landscaping

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site. Specifically, the Project would provide approximately 193,000 square feet of private, common, and publicly accessible open space, of which 112,382 square feet would comply with the LAMC definition of open space. Of the 112,382 square feet of open space, approximately 30,741 square feet would be public open space and 81,641 square feet would include interior and exterior private and common open space for residents only. The portion of the Project on the City Property would provide 60,248 square feet of private recreational amenities and public open space to meet its LAMC residential open space requirement of 57,975 square feet. The portion of the Project on the County Property would provide 52,134 square feet of private recreational amenities and public open space.

As discussed above, the Project Site includes 97 existing trees (82 on-site trees, 14 right-of-way trees, and one off-site tree whose canopy overhangs the County Property). The County Property contains 27 on-site trees and one off-site tree with an overhanging canopy. The City Property consists of 69 trees (55 on-site and 14 right-of-way). In addition, of the 97 inventoried trees, one on-site tree is located on the boundary line between the City Property and the County Property. The Project would remove the 82 on-site trees and 11 of the right-of-way trees, while preserving three of the right-of-way trees. The Project would plant 214 trees within the Project Site and the right-of-way adjacent to the Project Site, including 145 trees on the City Property to exceed the LAMC tree planting requirement of 123 trees, and 69 trees on the County Property. The portion of the Project on the County Property is not subject to the County's or City's zoning regulations as it relates to any tree planting requirement.<sup>26</sup>

As shown in Figure 6, Conceptual Site Plan—County Property, and Figure 7, Conceptual Site Plan—City Property, the Project would provide a network of public and private open spaces throughout the Project Site.

The large public Civic Plaza would be located in between the Beacon building and the relocated Open Space Bandstand, and would feature a large flexible area for gatherings, movie nights, concerts, yoga, street fairs, and arts programming. The Civic Plaza would be surrounded by terraced decks, outdoor dining space, and ground-level Felicia Mahood Senior Center uses. The Project would also feature a publicly accessible walkway along the Purdue Avenue axis, referred to herein as "Purdue Paseo," that would be lined with landscaping, commercial uses, and outdoor dining on the north and transition to a residential walkway that opens to Iowa Avenue on the south. The Purdue Paseo would be designed to support weekly farmers markets stalls and to accommodate a variety of public uses.

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<sup>26</sup> The Project would not remove any existing trees from the Library and LAPD Parcels since these parcels will not be redeveloped.

Residential common open space would be primarily located adjacent to the Courthouse Arts Pavilion and would feature landscaped gardens, an activity lawn, children’s play areas, and shared outdoor community space for the residential uses. Additional open space would be provided in the upper-level courtyards and roof decks of the Beacon and Purdue Place buildings, which would include landscaped areas, amenity lounges, outdoor BBQ areas, and pools. Level 2 of the Felicia Mahood Senior Center would include shaded outdoor space for fitness uses and other uses surrounded by vegetable gardens overlooking the Civic Plaza. The Project would also provide a resident-only central dog park, accessible from the sidewalk and the Purdue Paseo, between the Municipal and Corinth House buildings. A new garden along the existing West Los Angeles Regional Branch Library frontage and sides would weave into the overall Project Site.

### **3.3.5 Access, Circulation, and Parking**

Vehicular access to the Project Site would be provided via two driveways along Butler Avenue and Corinth Avenue. Pedestrian and bicycle access to the Project Site would be provided throughout the perimeter of the Project Site.

The Project would provide 1,563 vehicle parking spaces within a single subterranean parking garage that would extend across the majority of the Project Site below grade (straddling the County Property and the City Property) and contain three parking levels where all vehicular parking spaces would be located. Specifically, 560 vehicular parking spaces would be located on the County Property and 1,003 vehicular parking spaces would be located on the City Property.<sup>27</sup>

The Project would also provide 557 bicycle parking spaces, including 86 short-term spaces and 471 long-term spaces on Level P1 of the parking garage, adjacent to the main building entries, and throughout the publicly accessible open space. Additional bicycle facilities (e.g., showers, lockers, maintenance area, etc.) would also be provided on Level P1. Furthermore, the Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas. Specifically, 30 percent of the Project’s parking spaces will be designated as electrical vehicle (EV) spaces capable of supporting future EV Supply Equipment (EVSE) and 10 percent of the spaces will be EV charging stations. These spaces will be distributed throughout the parking areas.

### **3.3.6 Lighting and Signage**

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spillover from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

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<sup>27</sup> It should be noted that 53 parking spaces for the proposed uses on the County Property would be provided within the portion of the parking garage located on the City Property.

Proposed signage would be designed to be compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC signage regulations. The Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

### **3.3.7 Site Security**

The Project would include numerous security features, envisioned to include a closed-circuit camera system and keycard entry for the residential and office uses and parking areas. The Project would also be designed such that entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

### **3.3.8 Sustainability Features**

The Project would be designed to meet the standards for the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold. The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6, California Energy Code). The Project also represents an infill development in close proximity to existing transit lines, walkable streets, and nearby existing commercial uses, and would utilize existing infrastructure to service the proposed uses. Sustainability features include, but are not limited to, water conservation features that include implementation of a stormwater management system, use of xeriscape and native plants, passive cooling strategies, a pedestrian- and bicycle-friendly site design, and waste reduction features. In addition, 30 percent of the Project's parking spaces will be designated as electrical vehicle (EV) spaces capable of supporting future EV Supply Equipment (EVSE) and 10 percent of the spaces will be EV charging stations as required by City of Los Angeles Ordinance 186,485.

### **3.3.9 Land Use and Zoning**

As noted above, the County Property is located within the West Los Angeles Community Plan Area of the City and has a Public Facilities General Plan land use designation with a corresponding PF-1XL zone designation (Public Facilities, Height District 1XL). However, as explained in Section 1, Introduction, of this Initial Study, the County will exercise sovereign immunity over the County Property; therefore, the County Property is not subject to the City's or the County's zoning regulations. The County will require ministerial site plan review to develop the portion of the Project on the County Property.

The City Property is also located within the West Los Angeles Community Plan area and has a Public Facilities General Plan land use designation and corresponding PF-1XL zone (Public Facilities, Height District 1XL). Pursuant to the LAMC, the PF Zone permits a wide array of land uses including government buildings, schools, public health facilities, and any joint public and private development uses permitted in a property's most restrictive adjoining zones (subject to obtaining the respective approvals from the City). Height District 1XL specifies a building height limit of two stories and 30 feet and allows up to a 3:1 FAR for property located in the PF Zone. The Project's proposed residential, neighborhood-serving commercial (restaurant/retail), municipal office, and recreational/institutional uses, as well as the proposed height and FAR, would be consistent with the City Property's Public Facilities General Plan land use designation and PF-1XL zone's use and development standards with approval of the requested entitlements identified below in Section 3.4, Requested Permits and Approvals.

As noted above, the Library and LAPD Parcels are also located within the West Los Angeles Community Plan area and have a Public Facilities General Plan land use designation and corresponding PF-1XL zone (Public Facilities, Height District 1XL). However, the Library and LAPD facilities will remain as is and would continue serving City functions.

### **3.3.10 Anticipated Construction Schedule**

Construction of the Project would commence with a sequenced demolition of the existing buildings and surface parking areas (except for the Library and LAPD Parcels and their existing improvements, which will not be redeveloped). This phase would be followed by grading and excavation for the subterranean parking garage. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2024 and be completed in 2028. It is estimated that approximately 625,000 cubic yards of export material would be hauled from the Project Site.

## **3.4 REQUESTED PERMITS AND APPROVALS**

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project.

The County will exercise sovereign immunity over the County Property and therefore, the County Property is not subject to the County's or City's zoning regulations. The County will require ministerial site plan review to develop the portion of the Project on the County Property. Moreover, the Applicant will be required to enter into the following agreements with the County:

- Option Agreements between the County and the Applicant, which will set forth the terms and conditions by which the Applicant may enter into ground leases with the County.
- Ground leases between the County and the Applicant for the long-term lease of the County Property.
- Reciprocal Easement Agreement(s) between the County, City, and the Applicant relating to the shared use, operation, maintenance, and financial responsibility across the Project Site.

- Other discretionary and ministerial permits and approvals that may be deemed necessary for the portion of the Project on the County Property, including, but not limited to, site plan reviews and/or conditional use permits.

The discretionary entitlements, reviews, permits and approvals required to implement the portion of the Project on the City Property are currently anticipated to include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 12.22.A-25, a Density Bonus Compliance Review for a Housing Development Project that provides at least 10 percent of the units for Very-Low Income Households, parking pursuant to Government Code Section 65915(p)(1), and the following incentives and waivers of development standards:
  - An On-Menu Incentive to modify the 3:1 FAR otherwise permitted by Height District No. 1-XL.
  - An Off-Menu Incentive to allow a height of up to 109 feet (to top of rooftop mechanical) in-lieu of 30 feet, and 8 stories in-lieu of the 2 stories otherwise permitted by Height District No. 1XL.
  - A Waiver of Development Standard to request relief from LAMC Section 12.21.C.2 to provide a 20-foot separation between the Corinth House building and the Municipal Building, and a 22-foot separation between Corinth House and Purdue Place in-lieu of the 32 feet required passageway.
- Pursuant to LAMC Section 16.05, Site Plan Review for a development that results in an increase of 50 or more dwelling units, 50,000 sf or more non-residential floor area, and/or generates more than 1,000 average daily trips.
- Pursuant to LAMC Section 12.24-W.1, a Main Conditional Use Permit for the sale and dispensing of a full line of alcoholic beverages for on-site and off-site consumption within up to four establishments.
- Pursuant to LAMC Section 17.15 and 17.03, a Vesting Tentative Tract Map to merge the existing lots, merge approximately 6,407 square feet of public right-of-way, re-subdivide into ground and/or airspace lots, a waiver of a 5-foot public right-of-way dedication adjacent to the Library Parcel along Santa Monica Boulevard, subdivide the Library Parcel from the balance of the City Property, re-align the property lines adjacent to the LAPD Parcel, and to approve a haul route.
- Pursuant to the applicable provisions of the State Streets and Highways Code and the Los Angeles City Administrative Code, a Street Vacation to vacate approximately 8,478 square feet of alleys within and adjacent to the Project Site.<sup>28</sup>
- Disposition and Development Agreements between the City and the Applicant, which will set forth the terms and conditions by which the Applicant may enter into ground leases with the City.

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<sup>28</sup> The approximately 8,478 square feet of alleys within and adjacent to the Project Site to be vacated would be incorporated into the County Property's lot area if the street vacation is approved.

- Ground leases between the City and the Applicant for the long-term lease of the City Property.
- A construction agreement between the City and the Applicant, which will include certain access and encroachment rights for the portion of the Project on the City Property.
- Reciprocal Easement Agreement(s) between the City, County, and the Applicant relating to the shared use, operation, maintenance, and financial responsibility across the Project Site.
- Pursuant to LAMC Sections 12.24-U.21 and 12.24-T, a Vesting Conditional Use Permit to allow the PF-zoned property to be developed with a joint public and private development with uses more intensive than those permitted in the most restrictive adjoining zones (i.e., R3-1).
- 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, haul route permits, on- and off-site tree removal 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 City is a Responsible Agency for the Project.

## 4 ENVIRONMENTAL IMPACT ANALYSIS

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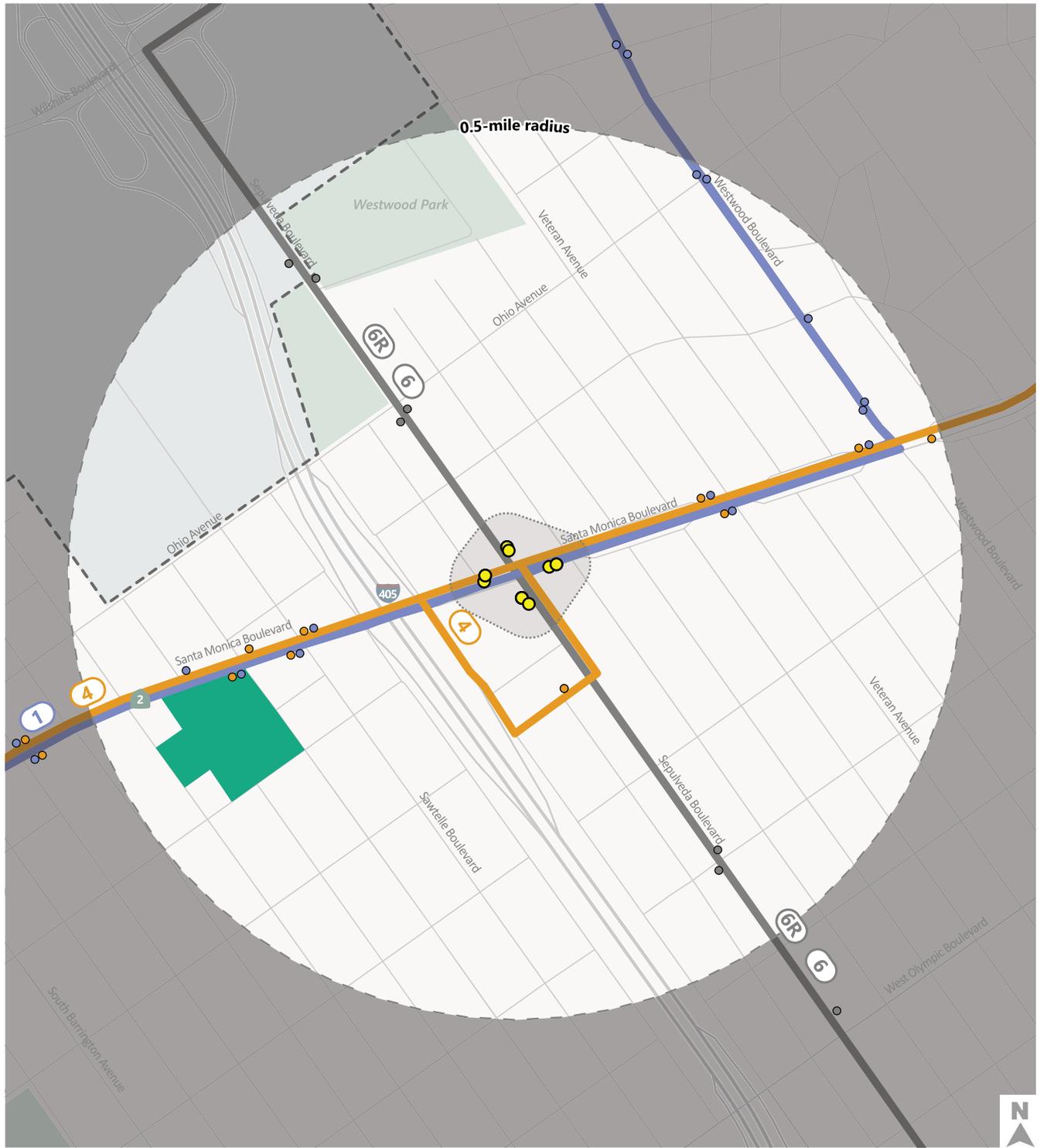
### I. AESTHETICS

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

*PRC Section 21099 applies to the Project because, consistent with Section 21099, the Project is a mixed-use residential development on an infill site within a transit priority area. Specifically, as described in Section 3, Project Description, of this Initial Study, the Project is a mixed-use residential development because it includes the development of residential, neighborhood-serving commercial, municipal office, and senior community center uses. The Project Site is located on an infill site, as defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. The Project Site is also located within a transit priority area, as defined in PRC Section 21099(a)(7), because it is located within one-half mile of an existing “major transit stop”, the intersection of Sepulveda Boulevard and Santa Monica Boulevard, as shown in Figure 8, Proximity to Major Transit Stops, on page 37. This “major transit stop” is served by Los Angeles County Metropolitan Transportation Authority (Metro) Line 4, Culver CityBus Lines 6/6R, and Santa Monica Big Blue Bus Line 1, which each have frequencies of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Project Site is located in a transit priority area as defined in PRC Section 21099. The City’s Zone Information and Map Access System (ZIMAS) also confirms the Project Site’s location within a transit priority area, as defined in the ZI No. 2452.<sup>29</sup> Therefore, the Project’s aesthetics and parking impacts shall not be considered significant impacts on the environment. The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment.*

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<sup>29</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN’s 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.



Project Site

**Major Transit Stop\***

● Santa Monica Blvd / Sepulveda Blvd

0.5-mile radius

**Transit Lines With <15 Minute Headways**

Big Blue Bus Route 1 **1**

Culver CityBus Lines 6/6R **6** **6R**

L.A. Metro Line 4 **4**

**Figure 8**

Proximity to Major Transit Stops

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

- |   |                          |                          |                                     |                                     |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**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. 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. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. The Project Site was also identified as being located within the potential West Los Angeles Civic Center Historic District by a 2012 SurveyLA Historic Resources Survey Report—West Los Angeles Historic Districts, Planning Districts and Multi-Property Resources.<sup>30</sup> The Project Site is also depicted on the City’s HistoricPlacesLA database.<sup>31</sup> Additionally, several of the on-site buildings, including 1633 and 1652 S. Purdue Avenue, as well as 11360 W. Santa Monica Boulevard, have been identified as potential contributors to the potential

<sup>30</sup> City of Los Angeles, SurveyLA, West Los Angeles Historic Districts, Planning Districts and Multi-Property Resources, August 2012

<sup>31</sup> City of Los Angeles, HistoricPlacesLA, www.historicplacesla.org/map, accessed January 11, 2019.

historic district. Scenic vistas of these resources from public rights-of-way are limited due to the predominantly flat terrain of the vicinity and the dense, intervening development that blocks long-range, expansive views. Visual resources that can be seen in combination with the Project Site are primarily limited to those located adjacent to the Project Site due to the densely developed nature of the Project Site area.

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public facilities/institutional uses. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available. Therefore, development of the Project would not have the potential to substantially or adversely affect a scenic vista since none currently exist. Moreover, pursuant to SB 743, the Project's aesthetics impact would not be considered a significant impact on the environment. No further evaluation of this topic in the EIR is 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 Project Site is not located along a state scenic highway. The nearest state scenic highway 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 approximately 11.3 miles east of SR-27.<sup>32</sup> Given the distance between the Project Site and the nearest state scenic highway, it is unlikely that the Project would result in adverse effects. In addition to scenic highways, the County recognizes that the coastline, mountain vistas, hillsides, and other scenic features of the region such as significant ridgelines are a significant resource. Ridgelines are considered significant aesthetic value that are to be preserved in their current state. This preservation is accomplished by limiting the type and amount of development near them. These "Significant Ridgelines" ("Major Ridgelines" on Santa Catalina Island) are designated by the General Plan or applicable Area/Community Plan, Local Coastal Program, or Community Standards District. No significant ridgelines are located within the Project Site or near the surrounding area or visible from any viewshed. Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site, nor would the Project result in any adverse effects to any designated significant ridgeline as no such ridgeline is located at or near the Project Site. Moreover, pursuant to SB 743, the Project's aesthetics impact would not be considered a significant impact on the environment. No further evaluation of this topic in the EIR is required.

**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?**

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<sup>32</sup> Caltrans, Scenic Highways, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed December 8, 2021.

**Less Than Significant Impact.** As described in Section 3, Project Description, of this Initial Study, the Project Site is located in an urbanized area. 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, the County Property is located within the City and has a Public Facilities General Plan land use designation with a corresponding PF-1XL zone (Public Facilities, Height District 1XL). However, the County will exercise sovereign immunity over the County Property; therefore, the County Property is not subject to the City's or the County's zoning regulations. The County will require a ministerial site plan review to develop the Project on the County Property. The City Property is located within the West Los Angeles Community Plan area and has a Public Facilities General Plan land use designation. The City Property is zoned PF-1XL (Public Facilities, Height District 1XL). Pursuant to the City of Los Angeles Municipal Code (LAMC), the PF Zone permits a wide array of land uses including government buildings, schools, public health facilities, and joint public and private developments. Height District 1XL specifies a building height limit of two stories and 30 feet and allows up to a 3:1 FAR for property located in the PF Zone. The City Property is also located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation Specific Plan, which helps mitigate the cumulative impacts of development by requiring new development to contribute a fair share towards completing needed regional transportation improvements, in addition to completing required project specific mitigations.

The Library and LAPD Parcels, which have the same land use and zoning as the City Property described above, will remain as is and will continue to serve City functions.

With regard to the County's and City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Los Angeles County 2035 General Plan, Los Angeles County Code (LACC), Citywide General Plan Framework Element (Framework Element), the West Los Angeles Community Plan, the Citywide Urban Design Guidelines, and the LAMC. As discussed above, the County will exercise sovereign immunity over the County Property; therefore, the County Property is not subject to the County's or the City's zoning regulations. Nevertheless, a consistency analysis based on the applicable County plans and regulations for the portion of the Project on the County Property is provided below for informational purposes only. The City Property is subject to the City's zoning regulations; therefore, a consistency analysis for the Project on the City Property is provided below. Overall, as discussed below, the Project does not conflict with the general intent of these plans and regulations.

### **County of Los Angeles 2035 General Plan**

A general consistency analysis with the aesthetic-related goals and policies set forth in the County General Plan for the proposed development on the County Property is analyzed in Table 5, Applicable Design Policies of the Los Angeles County General Plan 2035, on page 41. The Project would support and would not conflict with various goals and policies aimed at enhancing community character by replacing existing older buildings with a new, environmentally sustainable mixed-use development that respects and enhances the Project Site and its surroundings. In particular, the Project would be designed to strengthen the neighborhood character and to retain and enhance the Project Site's evolving civic center concept initiated in the 1920s and expanded in the 1950s and 1960s for the 21st century. The proposed buildings within the County Property would also continue

**Table 5  
Applicable Design Policies of the Los Angeles County General Plan 2035**

Policies	Would the Project Conflict
<b>Chapter 6: Land Use Element</b>	
<p><b>Policy LU 5.1:</b> Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types and styles.</p>	<p><b>No Conflict:</b> The Project is a mixed-use development with a variety of housing types. As described in Section 3, Project Description, of this Initial Study, the Project would construct a variety of market-rate and income-restricted housing units, including affordable housing units for seniors within the County Property. The residential units would be located within four new structures ranging from five- to seven-stories with approximate heights from 70 feet to 93 feet to the top of the parapet (75 feet to 98 feet to the top of the rooftop mechanical). The Project would be designed to strengthen the neighborhood character and to respond to the neighborhood context of adjacent structures. Therefore, the Project would not conflict with and thus would be consistent with this policy.</p>
<p><b>Policy LU 10.3:</b> Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.</p>	<p><b>No Conflict:</b> The vicinity of the Project Site is developed with a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public facilities/institutional uses. The Project would replace the existing uses within the County Property with four new structures ranging from five- to seven-stories with approximate heights from 70 feet to 93 feet to the top of the parapet (75 feet to 98 feet to the top of the rooftop mechanical), thereby continuing the varied scale of buildings surrounding the Project Site.</p> <p>The Project would be designed to strengthen the neighborhood character and to retain and enhance the Project Site’s evolution as a civic site over the years. The proposed buildings would feature building materials such as textured concrete panels, profiled metal siding, smooth acrylic plaster, cement fiber board and batten, as well as ornamental metal for gates and fences. The Project would also feature a variety of metal sunshade devices made from perforated and expanded metals as well as diverse color pallets. New buildings within the County Property would be designed to enhance appreciation of both old and new structures by demonstrating sensitivity to adjacent building heights; appropriate additions (new buildings, design elements) that link the old and new; and architecture and site design that elevate and focus appreciation of the site’s history and spatial qualities. The buildings would be designed to sensitively transition on all sides and would respond to the neighborhood context of adjacent structures. Therefore, the Project would not conflict with and thus, would be consistent with this policy.</p>
<p><b>Policy LU 10.5:</b> Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction.</p>	<p><b>No Conflict:</b> The Project would feature landscaped gardens, an activity lawn, children’s play areas, and a shared community space for the residential uses within the County Property. The Project would also feature a publicly accessible walkway along the Purdue Avenue axis (Purdue Paseo) that would be lined with commercial uses and outdoor dining and would be designed to accommodate a variety of public uses</p>

**Table 5 (Continued)**  
**Applicable Design Policies of the Los Angeles County General Plan 2035**

Policies	Would the Project Conflict
	<p>and encourage community interaction.</p> <p>Proposed signage within the County Property would be designed to be compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage. The Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare.</p> <p>As described above in Section 3, Project Description, the Project would be designed to strengthen the neighborhood character and to retain and enhance the Project's Site's evolving civic center concept initiated in the 1920s and expanded in the 1950s and 1960s, including through the proposed landscaping and signage. The open design and presence of Purdue Paseo and the central alley between the Municipal building and Civic Plaza would encourage walking along and through the Project Site, thereby providing linkages to adjacent uses. The Project would also frame the existing West Los Angeles Regional Branch Library with new landscaping to highlight a building that has historically been part of the overall compound of civic structures.</p> <p>Overall, both the proposed landscaping and signage would represent the historical nature of the Project Site while revitalizing the Project Site and surroundings. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.</p>
<p><b>Policy LU 10.7:</b> Promote public spaces, such as plazas that enhance the pedestrian environment, and, where appropriate, continuity along commercial corridors with active transportation activities.</p>	<p><b>No Conflict:</b> The Project would incorporate a variety of open space and recreational amenities throughout the Project Site. Specifically, the Project would provide a total of approximately 52,134 square feet of open space within the County Property, including approximately 6,020 square feet of public open space.</p> <p>As discussed in Section 3, Project Description, of this Initial Study, the Project would feature landscaped gardens, an activity lawn, children's play areas, and a shared community space for the residential uses within the County Property. The Project would also feature a publicly accessible walkway along the Purdue Avenue axis, referred to herein as "Purdue Paseo," that would be lined with commercial uses and outdoor dining on the north and transition to a residential walkway that opens to Iowa Avenue on the south. The Purdue Paseo would be designed to support weekly farmers markets stalls and to accommodate a variety of public uses. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.</p>
<p><b>Chapter 9: Conservation/Natural Resources Element</b></p>	
<p><b>Policy C/NR 13.3:</b> Reduce light trespass, light pollution and other threats to scenic</p>	<p><b>No Conflict.</b> As previously discussed, the County Property is currently occupied by the former West Los Angeles</p>

**Table 5 (Continued)**  
**Applicable Design Policies of the Los Angeles County General Plan 2035**

Policies	Would the Project Conflict
resources.	Courthouse building and associated surface parking lots as well as a vacant site along Santa Monica Boulevard and Purdue Avenue (to the east). The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public facilities/institutional uses. As previously described above, publicly available scenic vistas of valued visual resources are not available in the vicinity of the Project Site. Therefore, the Project would not conflict with and thus, would be consistent with, this policy. Refer to response to Checklist Question I.d, below, for a discussion of light pollution impacts.
<b>Policy C/NR 13.6:</b> Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.	<b>No Conflict:</b> Refer to Policy C/NR 13.3, above.
<hr/> <p><i>Source: Eyestone Environmental, 2022.</i></p>	

the diverse mix of uses and scale of buildings surrounding the Project Site. The Project would further support and would not conflict with the County’s policies and goals that encourage land uses and developments to complement and be compatible with the natural environment and landscape by providing a new mixed-use project with an integrated mix of complementary uses and expanding existing outdoor open space areas. Specifically, the Project would integrate the proposed mix of uses with a variety of open space and recreational amenities and would include landscaped gardens, an activity lawn, children’s play areas, and a shared community space for the residential uses within the County Property. Further, the Project would support the County’s policies to consider the built environment of the surrounding area and location in the design and scale of new buildings while promoting architecturally distinctive buildings at prominent locations.

**Los Angeles County Code**

The Los Angeles County Code regulates development of unincorporated areas of the County through land use designations and development standards regarding allowable uses, density, height, and design. As the Project Site is not located within an unincorporated area of the County, land use and zoning designations have not been established by the County for the Project Site. In addition, the County will exercise sovereign governmental immunity over the County Property; therefore, the County Property is not subject to the County’s or City’s zoning regulations. The County will require ministerial site plan review to develop the Project on the County Property.

**Citywide General Plan Framework Element**

The 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 Project’s general consistency with the aesthetic-related goals and policies set forth

in the City's Framework Element is analyzed in Table 6, Applicable Goals, Objectives, and Policies of the City's General Plan, on page 45.

The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing the existing buildings (i.e., City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building) with a new mixed-use development consisting of residential, neighborhood-serving commercial, municipal office, and senior community center uses that would complement the uses surrounding the Project Site. The new buildings would be designed to sensitively transition on all sides and would respond to the neighborhood context of adjacent commercial corridors, police buildings, and both existing and future residential structures. New buildings would be designed to enhance appreciation of both old and new structures by including new architecture and site design that would elevate and focus appreciation of the Project Site's history, spatial qualities, and mid-century Municipal works.

The Project would also enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, portions of the Project Site along Santa Monica Boulevard would facilitate an active and vibrant pedestrian corridor with retail and restaurant uses. New landscaping extending from the existing West Los Angeles Regional Branch Library to the west and leading to the Project Site's northeast anchor, the Felicia Mahood Multipurpose Center, would invite pedestrians along its edges and into the Civic Plaza. From the northeast corner along Corinth Avenue, the buildings would seamlessly transition from senior center/commercial to residential uses. At the intersection of Idaho Avenue with Corinth Avenue, generous landscaping would create a gateway into the new community, inviting surrounding local residents into the Civic Plaza. Along the southern perimeter, Iowa Avenue would be lined with trees and sidewalks at a scale that aligns with adjacent residential streets, encouraging a walking experience. Butler Avenue, the western edge of the Project Site, would serve the active commercial functions, including public parking ingress/egress, trash, and loading, as well as transitioning into a residential element at Iowa Avenue. Dedicated and secure green areas would be nestled around the residential buildings, with many ground-level courtyards visually connected to the core circulation of the Project Site, thereby promoting a safe pedestrian experience. Exterior lighting would enhance buildings, entrances, landscapes, and pedestrian paths while increasing security.

The Project would also provide a network of public and private open space throughout the Project Site. Public ground level open space would be configured around the axis formed by the Courthouse Arts Pavilion (the former Courthouse building), the Municipal building, the Beacon, and the Felicia Mahood Multipurpose Center. A large plaza, referred to herein as the Civic Plaza, would be located in between the Beacon building and the relocated bandstand and would feature a large flexible area for gatherings, movie nights, concerts, yoga, street fairs, and arts programming. The Civic Plaza would be surrounded by terraced decks, outdoor restaurant space, and ground-level Felicia Mahood Senior Center uses. The Project would also feature a publicly accessible walkway along the Purdue Avenue axis, referred to herein as Purdue Paseo, that would be lined with commercial uses and outdoor dining on the north and transition to a residential walkway that opens to Iowa Avenue on the south. The Purdue Paseo would be designed to support weekly farmers market stalls and to accommodate a variety of public uses. The Project would also provide a central dog park for residents, accessible from the sidewalk and the Purdue Paseo, between the Municipal and Corinth House buildings. A new garden along the Library frontage and sides would weave the overall Project Site.

**Table 6  
Applicable Goals, Objectives, and Policies of the City's General Plan**

Goals and Guidelines	Would the Project Conflict
<i>General Plan Framework Element Land Use Chapter (Chapter 3)</i>	
<p><b>Policy 3.7.4:</b> Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.</p>	<p><b>No Conflict.</b> As described in Section 3, Project Description, of this Initial Study, the existing City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building would be removed and replaced with 926 housing units (including 495 market-rate and 431 income-restricted housing units for a total of 961,290 square feet of residential floor area), 70,965 square feet of neighborhood-serving commercial (retail/restaurant) uses, 76,341 square feet of municipal office uses, and 25,846 square feet of senior community center uses. As provided below, the Project would be consistent with applicable standards in the Urban Form and Neighborhood Design Chapter as well as the Citywide Design Guidelines. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.</p>
<i>General Plan Framework Element Housing Chapter (Chapter 4)</i>	
<p><b>Objective 4.3:</b> Conserve scale and character of residential neighborhoods.</p>	<p><b>No Conflict.</b> The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public facilities/institutional uses. Properties to the north along Santa Monica Boulevard are developed with low-rise, single-story commercial buildings with community-serving uses (retail, restaurant, and other neighborhood-serving uses) and a mid-rise, six-story mixed-use multi-family residential and commercial building. Properties to the east of the Project Site along Corinth Avenue are developed with low- to mid-rise residential and commercial buildings, a single-story commercial/restaurant building, and a mid-rise commercial office building. Properties to the south of the Project Site along Iowa Avenue are developed with multi-family residential uses within low-rise buildings and a low-rise church building. Properties to the west of the Project Site along Butler Avenue include low- to mid-rise municipal, institutional, residential, and commercial buildings, including several low- to mid-rise multi-family residential buildings, a church, and mid-rise commercial buildings.</p> <p>As discussed in Section 3, Project Description, of this Initial Study, the Project would develop nine new structures ranging from two- to eight-stories with approximate heights from 43 feet to 100 feet to the top of the building (58 feet to 109 feet to the top of the rooftop mechanical), thereby continuing the varied scale of the buildings surrounding the Project Site. The buildings would be designed to sensitively transition on all sides through varied massing and would respond to the neighborhood context of adjacent commercial corridors, police buildings, and both existing and future residential structures. New buildings would be designed to enhance appreciation of both old and new structures by demonstrating sensitivity to adjacent building heights; appropriate additions, such as new landscaping to highlight the Library and a</p>

**Table 6 (Continued)**  
**Applicable Goals, Objectives, and Policies of the City's General Plan**

Goals and Guidelines	Would the Project Conflict
<i>General Plan Framework Element Land Use Chapter (Chapter 3)</i>	
	refurbished open space bandstand, that create a link between old and new; and new architecture and site design that elevate and focus appreciation of the Project Site's history and spatial qualities. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.
<i>General Plan Framework Element Urban Form and Neighborhood Design Chapter (Chapter 5)</i>	
<b>Objective 5.5:</b> Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	<b>No Conflict:</b> As described in Section 3, Project Description, of this Initial Study, the Project would construct a new mixed-use development consisting of residential, neighborhood-serving commercial, municipal office, and senior community center uses that would complement the uses surrounding the Project Site. The Project would be designed to complement the existing surrounding uses and respond to the varied scale character of the surrounding area. In addition, the Project would improve the quality of the public realm by providing streetscape improvements to create a cohesive visual identity for the Project Site and enhance the pedestrian experience. Additionally, the Project would include publicly accessible open space amenities such as a central plaza, lawns, outdoor seating areas, terraced decks. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.
<b>Policy 5.8.4:</b> Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	<b>No Conflict.</b> Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC signage regulations. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Illumination used for Project signage on City Project would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.
<i>General Plan Framework Element Infrastructure and Public Services Chapter (Chapter 9)</i>	
<b>Goal 9P:</b> 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 façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light	<b>No Conflict.</b> The Project would provide appropriate lighting for nighttime vision, visibility, and safety needs throughout the Project Site, including outdoor locations, pathways, and the subterranean parking levels. Night lighting would be low profile and at the necessary intensity to provide a safe environment. Sufficient lighting would also be provided in the subterranean parking levels to maximize visibility and reduce areas of concealment. Any terrace lighting would be directed downward towards walkable surfaces and shielded from view of the adjacent residential neighbors and comply with applicable City regulations. All new street and pedestrian

**Table 6 (Continued)**  
**Applicable Goals, Objectives, and Policies of the City's General Plan**

Goals and Guidelines	Would the Project Conflict
<i>General Plan Framework Element Land Use Chapter (Chapter 3)</i>	
pollution, light trespass, and glare.	lighting within the public right-of-way would comply with applicable City regulations and would require approval from the City's Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties. The Project would protect and preserve the nighttime environment and driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare by shielding and directing outdoor security lighting onto building surfaces and toward the interior of the Project Site to prevent light spillover onto sensitive resources. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.
<b>Objective 9.40:</b> Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	<b>No Conflict.</b> Proposed lighting would be implemented in accordance with the lighting standards set forth in the California Building Code and the California Energy Code, which establish light intensities for various land uses. Furthermore, as discussed above under Goal 9P, the Project would minimize light pollution, light trespass, and glare. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.
<b>Policy 9.40.1:</b> Require lighting on private streets, pedestrian oriented areas, and pedestrian walks to meet minimum City standards for street and sidewalk lighting.	<b>No Conflict.</b> Refer to the discussion for Goal 9P above.
<b>Policy 9.40.2:</b> Require parking lot lighting and related pedestrian lighting to meet recognized national standards.	<b>No Conflict.</b> Refer to the discussion for Goal 9P above. In addition, the Project would provide sufficient lighting in subterranean parking areas to maximize visibility and reduce areas of concealment. There would also be sufficient lighting along walkways to facilitate pedestrian orientation and clearly identify a secure route between the parking and entry into the new buildings. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.
<b>Policy 9.40.3:</b> Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for façade lighting, security lighting, and advertising lighting, including billboards.	<b>No Conflict.</b> While this policy is a Citywide goal relating to lighting regulations, the Project would not conflict with its implementation. Refer to the discussion for Goal 9P above.
<b>General Plan Conservation Element (Section 15)</b>	
<b>Objective:</b> Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	<b>No Conflict.</b> As previously discussed, the Project Site is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public

**Table 6 (Continued)**  
**Applicable Goals, Objectives, and Policies of the City's General Plan**

Goals and Guidelines	Would the Project Conflict
<i>General Plan Framework Element Land Use Chapter (Chapter 3)</i>	
	facilities/institutional uses. Therefore, publicly available scenic vistas of valued visual resources are not available in the vicinity of the Project Site. As such, the Project would not obstruct or remove access to natural and scenic vistas. Therefore, the Project would not conflict with and thus, would be consistent with, this policy.
<hr/> <i>Source: Eyestone Environmental, 2022.</i>	

Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site and would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element and, therefore, would not conflict with the Framework Element policies regarding scenic quality.

**West Los Angeles Community Plan**

The Project Site is located within the West Los Angeles Community Plan area. As it relates to scenic quality, the West Los Angeles Community Plan includes the following policies applicable to the Project:

- **Policy 1-3.1:** Require architectural compatibility and adequate landscaping for new multi-family residential development to protect the character and scale of existing residential neighborhoods.
- **Policy 2-2.1:** Encourage Pedestrian-oriented design in designated areas and in new development.
- **Policy 2-2.3:** Require that mixed use projects and development in pedestrian oriented districts be designated and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses.
- **Policy 2-3.1:** Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.
- **Policy 2-3.2:** Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.

The vicinity of the Project Site is developed with a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public facilities/institutional uses. Properties to the north along Santa Monica Boulevard are developed with low-rise, single-story commercial buildings with community-serving uses (retail, restaurant, and other neighborhood-serving uses) and a

mid-rise, six-story mixed-use multi-family residential and commercial building. Properties to the east of the Project Site along Corinth Avenue are developed with low- to mid-rise residential and commercial buildings, a single-story commercial/restaurant building, and a mid-rise commercial office building. Properties to the south of the Project Site along Iowa Avenue are developed with multi-family residential uses within low-rise buildings and a low-rise church building. Properties to the west of the Project Site along Butler Avenue include low- to mid-rise municipal, institutional, residential, and commercial buildings, including several low- to mid-rise multi-family residential buildings, a church, and mid-rise commercial buildings. Against this backdrop, the Project would replace the existing uses within the Project Site, including the approximately 36,995-square-foot West Los Angeles Courthouse building within the County Property, and the approximately 41,343-square-foot Municipal building and the 16,800-square-foot Felicia Mahood Multipurpose Center within the City Property, with nine new structures ranging from two to eight stories with approximate heights from 43 feet to 100 feet to the top of the building (58 feet to 109 feet to the top of the rooftop mechanical), thereby continuing the varied scale of buildings surrounding the Project Site. The Project would be designed to strengthen the neighborhood character and to retain and enhance the Project Site's evolving civic center concept initiated in the 1920s and expanded in the 1950s and 1960s for the 21st century. New buildings would be designed to enhance appreciation of both old and new structures by demonstrating sensitivity to adjacent building heights; appropriate additions that link the old and new; and new architecture and site design that elevate and focus appreciation of the site's history, spatial qualities, and mid-century Municipal works.

The Project would provide a network of public and private open space throughout the Project Site. Public ground level open space would be configured around the axis formed by the Courthouse Arts Pavilion (the former Courthouse building), the Municipal building, the Beacon, and the Felicia Mahood Multipurpose Center. The Civic Plaza would be located in between the Beacon building and the relocated bandstand and would feature a large flexible area for gatherings, movie nights, concerts, yoga, street fairs, arts programming. The Civic Plaza would be surrounded by terraced decks, outdoor restaurant space, and ground-level Felicia Mahood Senior Center uses. The Project would also feature a publicly accessible walkway along the Purdue Paseo, that would be lined with commercial uses and outdoor dining on the north and transition to a residential walkway that opens to Iowa Avenue on the south. The Purdue Paseo would be designed to support weekly farmers markets stalls and to accommodate a variety of public uses. The Project would also provide a resident-only central dog park, accessible from the sidewalk and the Purdue Paseo, between the Municipal and Corinth House buildings. Residential open space would be primarily located adjacent to the Courthouse Arts Pavilion (the former Courthouse building) and would feature landscaped gardens, a large activity lawn, children's play areas, and shared community space for the residential uses. Additional open space would be provided in the upper-level roof decks of the Beacon and Purdue Place buildings and would include landscaped areas, amenity lounges, outdoor BBQ areas, and pools. Level 2 of the Felicia Mahood Senior Center would include shaded outdoor space for fitness uses and other uses surrounded by vegetable gardens overlooking the Civic Plaza. A new garden along the Library frontage and sides would weave the overall Project Site.

Overall, the Project's open design would encourage walking along and through the Project Site, thereby providing linkages to adjacent uses and enhancing the pedestrian experience. The buildings would be designed to sensitively transition on all sides and would respond to the neighborhood context of adjacent commercial corridors, police buildings, and both existing and future residential structures. Furthermore, as discussed above, the Project would maximize open space and landscape opportunities and would provide significant public open space via a central Civic Plaza surrounded

with active uses. Therefore, the Project would not conflict with the applicable objectives and policies that support the goals of the West Los Angeles Community Plan related to scenic quality.

### **Citywide 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 in a project, not all will be appropriate in every case. As discussed below, the Project would be consistent and not conflict with the Citywide Design Guidelines.

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

The Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, portions of the Project Site along Santa Monica Boulevard would facilitate an active and vibrant pedestrian corridor with retail and restaurant uses. New landscaping extending from the Library to the west and leading to the Project Site's northeast anchor, the Felicia Mahood Multipurpose Center, would invite pedestrians along its edges and into the Civic Plaza. From the northeast corner along Corinth Avenue, the buildings would seamlessly transition from commercial to residential uses. At the intersection of Idaho Avenue with Corinth Avenue, generous landscaping would create a gateway into the new community, inviting surrounding local residents into the Civic Plaza. Along the southern perimeter, Iowa Avenue would be lined with trees and sidewalks at a scale that aligns with adjacent residential streets, encouraging a walking experience. Butler Avenue, the western edge of the Project Site, would serve the active commercial functions, including public parking ingress/egress, trash, and loading, as well as transitioning into a residential element at Iowa Avenue. Dedicated and secure green areas would be nestled around the residential buildings, with many ground-level courtyards visually connected to the core circulation of the Project Site, thereby promoting a safe pedestrian experience. The Project would also include pedestrian-scale lighting and visibility at the ground floor which would improve the livability of the neighborhood at all hours. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

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

Vehicular access to the Project Site would be provided via two driveways along Butler Avenue and Corinth Avenue. The proposed driveways would be designed to meet all applicable Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. In addition, as previously described, the Project includes new landscaping along the Project Site perimeter to enhance the pedestrian experience.

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

As discussed above, the Project would contribute to a vibrant and attractive public realm with streetscape improvements to create a cohesive visual identity for the Project Site and enhance the pedestrian experience, including through pedestrian linkages connecting the Project Site's surrounding streets. Additionally, the Project would include publicly-accessible open space amenities,

such as a central plaza, lawns, outdoor seating areas, a resident-only dog park, and terraced decks. In this manner, the Project would actively engage with streets and public space to the extent feasible and maintain a human scale.

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

As previously discussed, the vicinity of the Project Site is developed with a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public facilities/institutional uses. The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing the existing older buildings with a new mixed-use development consisting of residential, neighborhood-serving commercial, municipal office, and senior community center uses that would complement the uses surrounding the Project Site. The buildings would be designed to sensitively transition on all sides and would respond to the neighborhood context of adjacent commercial corridors, police buildings, and both existing and future residential structures. New buildings would be designed to enhance appreciation of both old and new structures by demonstrating sensitivity to adjacent building heights; appropriate additions that create a link between old and new; and new architecture and site design that elevate and focus appreciation of the Project Site's history, spatial qualities, and mid-century Municipal works. As such, the Project would organize and shape development in a manner that recognizes and respects the surrounding context.

**Guideline 5: Express a clear and coherent architectural idea.**

As discussed above, the Project would develop nine new structures ranging from two- to eight-stories with approximate heights from 43 feet to 100 feet to the top of the building (58 feet to 109 feet to the top of rooftop mechanical equipment). The Project would be designed to retain and enhance the Project's Site's evolving civic center concept initiated in the 1920s and expanded in the 1950s and 1960s for the 21st century. The proposed buildings would feature building materials such as textured concrete panels, profiled metal siding, smooth acrylic plaster, cement fiber board and batten, as well as ornamental metal for gates and fences. The Project would also feature a variety of metal sunshade devices made from perforated and expanded metals as well as diverse color pallets. New buildings would be designed to enhance appreciation of both old and new structures by demonstrating sensitivity to adjacent building heights; appropriate additions that create a link between old and new; and new architecture and site design that elevate and focus appreciation of the site's history, spatial qualities, and mid-century Municipal works. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site, expressing a clear and coherent architectural idea.

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

As discussed above, the Project proposes to provide various streetscape improvements, such as trees and sidewalks at a scale that align with adjacent streets, as well as pedestrian linkages via two mid-block paseos connecting the Project Site's adjacent streets. The Project would also provide green areas nestled around the residential buildings as well as many ground-level courtyards. The Project would also include pedestrian-scale lighting and visibility at the ground floor which would serve to enhance the safety of pedestrians at night.

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

Internal to the Project Site, pedestrian walkways would be provided along all driveways to minimize pedestrian-vehicular conflicts. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the buildings.

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

The Project Site is located in an urbanized area and is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. Existing landscaping within and adjacent to the Project Site includes grass areas and 97 trees, including 82 on-site trees, 14 right-of-way trees, and one off-site tree whose canopy overhangs the Project Site. The County Property consists of 27 on-site trees and one off-site tree with an overhanging canopy and the City Property consists of 69 trees (55 on-site and 14 right-of-way). As discussed further below, none of the trees within the Project Site and in the adjacent public right-of-way are considered protected species by the City or County.

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 in Section 3, Project Description, of this Initial Study, the Project would be designed to meet the standards of the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold. The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). The Project also represents an infill development in close proximity to existing transit lines and walkable streets, and would utilize existing infrastructure to service the proposed uses. Sustainability features include, but are not limited to, water conservation features that include implementation of a stormwater management system, use of xeriscape and native plants, passive cooling strategies, a pedestrian- and bicycle-friendly site design, and waste reduction features. In addition, 30 percent of the Project's parking spaces will be designated as EV spaces capable of supporting future EVSE and 10 percent of the spaces will be EV Charging Stations as required by City Ordinance 186,485. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable.

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

The Project would comply with the City's Low Impact Development (LID) ordinance. As part of these requirements, the Project would manage stormwater through a capture and reuse and/or biofiltration system. This system would capture stormwater runoff that would then be used for irrigation of the new landscaping around the Project Site.

In summary, based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Moreover, pursuant to SB 743, the Project's aesthetics impacts

would not be considered significant. Therefore, no further evaluation of this topic in the EIR is 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.** Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the vicinity of the Project Site. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use(s) affected, proximity to the affected use(s), the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

## **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 season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary, for a short duration while construction activities conclude for the day, 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.<sup>33</sup> Additionally, as part of the Project, construction lighting would be shielded to minimize the potential for light spillover to affect adjacent residential properties. Project construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials are positioned in highly visible locations where the reflection of sunlight could occur. However, any

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<sup>33</sup> LAMC Chapter 9, Article 3, Section 93.0117(b) provides that no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

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. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of construction activity to screen public views at the street level from off-site locations. Therefore, any daytime or nighttime glare associated with Project construction activities would be minimal and temporary in nature.

Based on the above, light and glare associated with temporary Project construction activities would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area, and impacts would be less than significant. Moreover, pursuant to SB 743, the Project's aesthetics impacts would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

### **Operation**

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Proposed signage would be designed to be compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC signage regulations. The Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

As it relates to glare, sun reflection from Project development could occur when the sun is low on the horizon, and motor vehicle operations could be affected when the point of reflection within the Project Site is in front of the driver. The Project would feature a variety of surface materials, including, but not limited to, glass, concrete, timber, and metal. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight.

Nighttime glare could result primarily from on-site illumination and vehicle headlights. As described above, the Project's illuminated signs would not exceed the prescribed LAMC lighting requirements. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to SB 743, the Project's aesthetic impacts would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

## II. AGRICULTURE AND FOREST RESOURCES

*In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data that are used for analyzing impacts on California's agricultural resources. Agricultural land is rated based on the soil quality and irrigation status; the best quality land is called Prime Farmland. These maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. FMMP produces Important Farmland Maps, which are a hybrid of resource quality (soils) and land use information.*

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**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.** The Project Site is located on “Urban and Built-up Land,” as categorized by the California Important Farmland Finder.<sup>34,35</sup> As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. Furthermore, 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.<sup>36,37</sup> As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

**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 (Commercial zone, Height District 1XL). Pursuant to the LAMC, the PF Zone permits a wide array of land uses including government buildings, schools, public health facilities, and joint public and private developments. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area.

The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) enables local governments to enter contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax

<sup>34</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>35</sup> California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14>, accessed December 8, 2021.

<sup>36</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>37</sup> California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14>, accessed December 8, 2021.

assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Project Site and surrounding area are not enrolled in any Williamson Act Contract.<sup>38</sup> Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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 is located in an urbanized area and is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. The Project Site does not include any forest land or timberland. In addition, as discussed above, the Project Site is not zoned for forest land and is not used as forest land.<sup>39</sup> Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and does not include any forest land.<sup>40</sup> Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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.** As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. Furthermore, the Project Site and surrounding area are not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.<sup>41</sup> As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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<sup>38</sup> California Department of Conservation, The Williamson Act Status Report 2016–17, August 2019.

<sup>39</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>40</sup> PRC Section 12220(g) defines forest land as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."

<sup>41</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

### 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM<sub>2.5</sub>], and lead<sup>42</sup>). SCAQMD’s 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>43</sup> With regard to future growth, SCAG has prepared their 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), commonly known as Connect SoCal, which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD’s

<sup>42</sup> Partial Nonattainment designation for lead for the Los Angeles County portion of the South Coast Air Basin only.

<sup>43</sup> SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's potential conflicts with the AQMP.

**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?**

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

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

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

**d. 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 significant objectionable odors are anticipated as a result of either construction or operation of the Project. The impacts of odors typically vary based on the nature, frequency, and intensity of the emission source and other factors such as wind speed and direction as well as the sensitivity of the receptors. Sensitive land uses in the vicinity of the Project Site include residential, educational, and institutional uses.

Construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. During construction, discernible odors could be produced from exhaust of equipment or unburned hydrocarbons from tailpipes of construction equipment. These potential odors would typically disperse rapidly from the Project Site and generally would not occur at a level that would affect a substantial number of people. Any odors that may be generated from the construction site would be localized and temporary in nature and would cease upon construction completion. Because potential odors from construction activities in an area with limited wind speed, are limited in intensity, and are short-term in duration, impacts are less than significant.

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 operation of these uses. In addition, 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.

Although objectionable odors rarely cause physical harm, they can be annoying and cause distress for the public. The construction and operation of the Project would also comply with SCAQMD Rules 401 (Visible Emissions), 402 (Public Nuisance), and 403 (Fugitive Dust), regarding visible emissions violations.<sup>44</sup> 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.<sup>45</sup> Therefore, odor nuisance complaints may be reported to the AQMD by any member of the public.

Based on the above, the Project would not result in other emissions such as those leading to odors. Impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

#### IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>44</sup> SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, [www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust](http://www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust), accessed December 8, 2021.

<sup>45</sup> SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

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

**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 Impact.** The Project Site is located on previously disturbed, developed land with largely impermeable surfaces and is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. Existing landscaping within Project Site is largely ornamental vegetation, which includes grass areas and 97 trees, including 82 on-site trees, 14 right-of-way trees, and one off-site tree whose canopy overhangs the County Property.<sup>46,47</sup> None of the 55 on-site trees on the City Property are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.<sup>48,49</sup>

<sup>46</sup> Carlberg Associates, City of Los Angeles Tree Inventory Report—West LA Commons, 11332 W. Santa Monica Boulevard, Los Angeles, California 90025, December 21, 2021. See Appendix IS-1 of this IS.

<sup>47</sup> The Project would not remove any existing trees from the Library and LAPD Parcels since these parcels will not be redeveloped.

<sup>48</sup> Carlberg Associates, City of Los Angeles Tree Inventory Report—West LA Commons, 11332 W. Santa Monica Boulevard, Los Angeles, California 90025, December 21, 2021. See Appendix IS-1 of this IS.

<sup>49</sup> Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

Since the Project Site is not located within an unincorporated area of the County, the Los Angeles County Oak Tree Ordinance would not apply. Notwithstanding, since there are no native oaks on the County Property, the Los Angeles County Oak Tree Ordinance No. 2019-0004 does not apply as this ordinance protects only native oaks with trunk diameters of 8 inches in diameter or greater. Additionally, the 14 trees within the public right-of-way surrounding the Project Site are not species that are protected by the LAMC. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of natural open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of suitable habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)<sup>50</sup> or by the U.S. Fish and Wildlife Service (USFWS)<sup>51</sup> would be present on-site. Furthermore, the Project Site is not located in or adjacent to a designated Significant Ecological Area or Biological Resource Area as defined by the County or City.<sup>52,53</sup> Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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.** The Project Site is located in an urbanized area and is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.<sup>54,55</sup> Furthermore, the Project Site and surrounding areas are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the County or City.<sup>56,57</sup> In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.<sup>58,59</sup> Therefore, the Project would not have a substantial adverse effect on any riparian

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<sup>50</sup> California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2021.

<sup>51</sup> United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report>, accessed August 31, 2021.

<sup>52</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

<sup>53</sup> County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

<sup>54</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>55</sup> United States Fish and Wildlife Service, National Wetlands Inventory, [www.fws.gov/wetlands/data/Mapper.html](http://www.fws.gov/wetlands/data/Mapper.html), accessed August 31, 2021.

<sup>56</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

<sup>57</sup> County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

<sup>58</sup> California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://apps.wildlife.ca.gov/bios/>, accessed August 31, 2021.

habitat or other sensitive natural community and no impact would occur. No further evaluation of this topic in the EIR is 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 discussed above, the Project Site is located in an urbanized area and is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. No water bodies or state and federally protected wetlands exist on the Project Site.<sup>60</sup> As such, the Project would not have an adverse effect on state or federally protected wetlands and no impact would occur. No further evaluation of this topic in the EIR is 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 located in an urbanized area and is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open space areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the County or City.<sup>61,62</sup>

According to the Tree Inventory Report prepared for the Project dated December 21, 2021, and included in Appendix IS-1 of this Initial Study,<sup>63</sup> there are 97 trees within and adjacent to the Project Site, including 82 on-site trees, 14 right-of-way trees and one off-site tree whose canopy overhands the Project Site. Of the 97 inventoried trees, the County Property includes 27 on-site trees and also includes the one off-site tree whose canopy overhangs the Project Site. The City Property includes 69 trees, including 55 on-site trees and 14 right-of-way trees. Of the 97 inventoried trees, one tree is located on the boundary line between the County Property and the City Property. None of the 55 on-site trees on the City Property are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.<sup>64,65</sup> Since the Project Site is not located within an

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<sup>59</sup> California Department of Fish and Wildlife, CDFW Lands, <https://apps.wildlife.ca.gov/lands/>, accessed December 8, 2021.

<sup>60</sup> United States Fish and Wildlife Service, National Wetlands Inventory, [www.fws.gov/wetlands/data/Mapper.html](http://www.fws.gov/wetlands/data/Mapper.html), accessed August 31, 2021.

<sup>61</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

<sup>62</sup> County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

<sup>63</sup> Carlberg Associates, City of Los Angeles Tree Inventory Report—West LA Commons, 11332 W. Santa Monica Boulevard, Los Angeles, California 90025, December 21, 2021. See Appendix IS-1 of this IS.

<sup>64</sup> Carlberg Associates, City of Los Angeles Tree Inventory Report—West LA Commons, 11332 W. Santa Monica Boulevard, Los Angeles, California 90025, December 21, 2021. See Appendix IS-1 of this IS.

unincorporated area of the County, the Los Angeles County Oak Tree Ordinance would not apply. Notwithstanding, since there are no native oaks on the County Property, the Los Angeles County Oak Tree Ordinance No. 2019-0004 does not apply as this ordinance protects only native oaks with trunk diameters of 8 inches in diameter or greater. Additionally, the 14 trees within the public right-of-way surrounding the Project Site are not species that are protected by the LAMC.

The Project would remove the 82 on-site trees and 11 right-of-way trees, while preserving three of the right-of-way trees.<sup>65</sup> Trees to be removed could potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, 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.” In compliance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project would involve scheduling tree removal activities outside of the nesting season (February 1–August 31), to the extent feasible. Notwithstanding, should vegetation removal activities occur during the nesting season, Mitigation Measure BIO-1 provided below would be implemented to mitigate potential impacts to migratory birds. As provided in Mitigation Measure BIO-1, nesting bird surveys would be completed no more than 48 hours prior to commencement of construction activities to determine whether nesting birds are present. If active nests are found, measures to ensure that the birds 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 and implementation of Mitigation Measure BIO-1, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant with mitigation incorporated. No further evaluation of this topic in the EIR is required.

**Mitigation Measure BIO-1:** To mitigate potential impacts on migratory birds, the following measures shall be implemented:

- Trimming and removal of trees and vegetation shall be minimized and performed outside of the bird nesting season (typically February 1 to September 15), to the extent feasible.
- In the event trimming or removal of trees and vegetation must be conducted during the bird nesting season, nesting bird surveys shall be completed within 300 feet of the construction area by a qualified biologist no more than 48 hours prior to trimming or removal activities to determine if nesting birds

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<sup>65</sup> Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

<sup>66</sup> The Project would not remove any existing trees from the Library and LAPD Parcels since these parcels will not be redeveloped.

are within the affected vegetation. Nesting bird surveys shall be repeated if trimming or removal activities are suspended for five days or more.

- In the event construction is scheduled during bird nesting season, nesting bird surveys shall be completed no more than 48 hours prior to construction to determine if nesting birds and active nests are in or within 500 feet of the construction area. Surveys will be repeated if construction activities are suspended for five days or more.
- In the event nesting birds are found within 500 feet of the construction area during the nesting bird survey, appropriate buffers (typically 150 feet for songbirds) as determined by a qualified biologist, shall be implemented, to ensure that nesting birds and active nests are not harmed. Buffers shall include fencing or other barriers around the nests to prevent any access to these areas and shall remain in place until birds have fledged and/or the nest is no longer active, as determined by a qualified biologist.

**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)?**

**Less Than Significant Impact.** The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as “protected” by the City . 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. The Los Angeles County Oak Tree Ordinance regulates the relocation or removal of oak trees. The Los Angeles County Oak Tree Ordinance prohibits a person from cutting, destroying, removing, relocating, inflicting damage, or encroaching into a protected zone of any tree of the oak genus without an oak tree permit. The County Oak Tree Ordinance protects any trees of the oak genus meeting the following criteria:

- The tree has a trunk diameter of eight inches or more (25 inches in circumference), as measured 4.5 feet above mean natural grade;
- The tree has multiple trunks, where the combined diameter of any two trunks is 12 inches (28 inches in circumference) or more;
- The tree is a heritage oak, where the largest trunk is at least 36 inches in diameter, or the tree has significant historical or cultural importance to the community, notwithstanding that the diameter is less than 36 inches; or
- The tree was provided as a replacement tree pursuant to County Code Section 22.174.070.

According to the Tree Inventory Report prepared for the Project dated December 21, 2021, and included in Appendix IS-1 of this Initial Study,<sup>67</sup> there are 97 trees within and adjacent to the Project Site, including 82 on-site trees, 14 right-of-way trees, and one off-site tree whose canopy overhangs the Project Site. Of the 97 inventoried trees, the County Property includes 27 on-site trees and one off-site tree with an overhanging canopy. The City Property includes 69 trees, including 55 on-site trees and 14 right-of-way trees. Of the 97 inventoried trees, one tree is located on the boundary line between the County Property and the City Property. None of the 55 on-site trees on the City Property are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.<sup>68,69</sup> Since there are no protected trees of the oak genus on the County Property, the Los Angeles County Oak Tree Ordinance does not apply. Additionally, the 14 street trees within the public rights-of-way surrounding the Project Site are not species that are protected by the LAMC.

The Project would remove the 82 on-site trees and 11 rights-of-way trees, while preserving three of the right-of-way trees.<sup>70</sup> On-site trees to be removed would be replaced at a 1:1 ratio, and street trees would be replaced on a 2:1 basis in accordance with the Bureau of Street Services, Urban Forestry Division's requirements. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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 described above, the Project Site is located in an urbanized area and is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. Existing landscaping within Project Site includes grass areas and 97 trees, including 82 on-site trees, 14 rights-of-way trees, and one off-site tree whose canopy overhangs the County Property.<sup>71</sup> The Project Site does not support any designated habitat or natural community. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>72</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

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<sup>67</sup> Carlberg Associates, City of Los Angeles Tree Inventory Report—West LA Commons, 11332 W. Santa Monica Boulevard, Los Angeles, California 90025, December 21, 2021. See Appendix IS-1 of this IS.

<sup>68</sup> Carlberg Associates, City of Los Angeles Tree Inventory Report—West LA Commons, 11332 W. Santa Monica Boulevard, Los Angeles, California 90025, December 21, 2021. See Appendix IS-1 of this IS.

<sup>69</sup> Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

<sup>70</sup> The Project would not remove any existing trees from the Library and LAPD Parcels since these parcels will not be redeveloped.

<sup>71</sup> Carlberg Associates, City of Los Angeles Tree Inventory Report—West LA Commons, 11332 W. Santa Monica Boulevard, Los Angeles, California 90025, December 21, 2021. See Appendix IS-1 of this IS.

<sup>72</sup> California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

## V. CULTURAL RESOURCES

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

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

**Potentially Significant Impact.** Section 15064.5 of the CEQA Guidelines generally defines a historical 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 PRC Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)). 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 a 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. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which oversees SurveyLA, a comprehensive program to identify potentially significant historical resources throughout the City. Additionally, the Los Angeles County 2035 General Plan and Los Angeles County Historical Landmarks Registry provide a list of historical resources within the County; however, since the Project Site is not located within an unincorporated area of the County, these do not apply.

As previously discussed, the Project Site is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. Based on a

review of the SurveyLA Historic Resources Survey Report on West Los Angeles Historic Districts, Planning Districts and Multi-Property Resources<sup>73</sup> and the HistoricPlacesLA database,<sup>74</sup> various existing improvements located at the Project Site—specifically, the West Los Angeles Courthouse, the West Los Angeles Municipal Building, the Felicia Mahood Senior Center, the bandstand, the pedestrian plaza, and landscaping—were identified as potential contributors to a potential historic district, which district was referred to in SurveyLA as the West Los Angeles Civic Center Historic District. Because the Project would involve modifications to these improvements, further evaluation of the Project’s potential impacts on historical resources will be included in the EIR.

**b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5?**

**Potentially Significant Impact.** CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project would result in excavation depths of up to approximately 52 feet below existing grade. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources, and the EIR will provide further analysis of the Project’s potential impacts to archaeological resources.

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

**Potentially Significant Impact.** The Project Site is located within an urbanized area and has been subject to previous grading and development. Specifically, as discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently located within the City of Los Angeles and is occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those that have previously occurred on the Project Site, the potential exists to uncover existing but undiscovered human remains. As such, further analysis of this topic will be included in the EIR.

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<sup>73</sup> City of Los Angeles, SurveyLA, West Los Angeles Historic Districts, Planning Districts and Multi-Property Resources, August 2012.

<sup>74</sup> City of Los Angeles, HistoricPlacesLA, [www.historicplacesla.org/map](http://www.historicplacesla.org/map), accessed January 11, 2019.

## 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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?**

**Potentially Significant Impact.** The Project Site would be redeveloped with residential, neighborhood-serving commercial, municipal office, and senior community center uses, associated circulation improvements, parking facilities, landscaping, and pedestrian-oriented open space. The Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively, compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

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

**Potentially Significant Impact.** First established in 2002 under SB 1078, California's Renewable Portfolio Standards (RPS) initially required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.<sup>75</sup> The program was accelerated in 2015 with SB 350 which mandated a 50 percent RPS by 2030. In 2018, SB 100 was signed into law, which again increased the RPS to 60 percent by 2030 and requires all the State's electricity to come from carbon-free resources by 2045.

The LADWP provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with SB 100, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030.

<sup>75</sup> CPUC, California Renewables Portfolio Standard (RPS) Program, [www.cpuc.ca.gov/rps](http://www.cpuc.ca.gov/rps), accessed December 8, 2021.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.<sup>76</sup> The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2017 national standards.<sup>77</sup>

The Project has been designed, and would be constructed, to incorporate environmentally sustainable building features and systems and construction protocols required by the Los Angeles Green Building Code and CALGreen Code. While the Project is not anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project’s compliance with LADWP’s plans for renewable energy, as well as the Project’s compliance with California Building Energy Efficiency Standards, will be further evaluated in the EIR.

## VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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. | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ii. Strong seismic ground shaking?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| iii. Seismic-related ground failure, including liquefaction?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| iv. Landslides?  | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

<sup>76</sup> California Energy Commission, 2019 Building Energy Efficiency Standards, [www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency](http://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency), accessed December 8, 2021.

<sup>77</sup> California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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 (CGS), 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 11,700 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.

CGS 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 designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone as mapped by CGS or within a Preliminary Fault Rupture Study Area as designated by the City.<sup>78,79</sup> Since no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Furthermore, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not exacerbate existing hazardous conditions related to surface rupture from a known earthquake fault that would result in substantial damage to structures, infrastructure, or other properties or expose people to substantial risk of injury. Impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

## ii. Strong seismic ground?

**Potentially Significant Impact.** The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Project would increase the amount of development on-site, thereby increasing the number of people on-site exposed to potential adverse effects from ground shaking. Although Project construction must comply with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, further analysis of the potential for strong seismic ground shaking will be provided in the EIR.

## iii. Seismic-related ground failure, including liquefaction?

**Potentially Significant Impact.** Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases as grain size and clay and gravel content increase. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases. The Project Site is located within an area identified by the City, County, and California Geological Survey as having a potential for liquefaction.<sup>80,81,82</sup> Consequently, the EIR will include a more detailed analysis of this issue.

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<sup>78</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>79</sup> The Los Angeles County Safety Element identifies areas located within an Alquist-Priolo Earthquake Fault Zone; however, since the Project Site is not located within an unincorporated area of the County, the County's Safety Element does not address the Project Site. As such, the analysis is based on the applicable state and City plans and regulations.

<sup>80</sup> Ibid.

<sup>81</sup> California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed December 6, 2021.

<sup>82</sup> The Los Angeles County Safety Element identifies areas located within Seismically Induced Liquefaction Zone; however, since the Project Site is not located within an unincorporated area of the County, the County's Safety Element does not address the Project Site. As such, the analysis is based on the applicable state and City plans and regulations.

#### iv. Landslides?

**No Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the topography of the surrounding area is variable, but in general, sloping to the south by approximately 2 percent. The elevations within the Project Site range from approximately 239 feet in the north to approximately 225 in the south. Given the largely impervious (developed/paved) nature of the Project Site, there are no large areas of exposed soil or rocks that could slide or become loose. In addition, the Project Site is not located in a landslide area as mapped by the State, nor is the Project Site mapped as a landslide area by the City.<sup>83,84,85,86</sup> Therefore, the Project would not directly or indirectly cause potential **substantial** adverse effects involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

**Potentially Significant Impact.** Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from the County of Los Angeles Department of Public Works (DPW) and City of Los Angeles Department of Building and Safety (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 LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the County's and City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Notwithstanding, further analysis of this topic will be provided in the EIR.

#### 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?

**Potentially Significant Impact.** As discussed above, the Project Site is susceptible to ground shaking and thus, the potential for lateral spreading may be present. As such, geologic stability will be addressed in the EIR.

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<sup>83</sup> California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed December 6, 2021.

<sup>84</sup> City of Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

<sup>85</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>86</sup> The Los Angeles County Safety Element identifies areas located within Seismically Induced Landslide Zone; however, since the Project Site is not located within an unincorporated area of the County, the County's Safety Element does not address the Project Site. As such, the analysis is based on the applicable state and City plans and regulations.

**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?**

**Potentially 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. The Project Site may contain soils that are considered to have a moderate to high expansive potential. Therefore, further analysis of this issue will be provided in the EIR.

**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 wastewater infrastructure.<sup>87</sup> As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

**Potentially 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 era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading, excavation up to a depth of 52 feet, and other construction activities that could have the potential to disturb existing but undiscovered paleontological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

With regard to unique geologic features, as discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. As such, no unique geologic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) are located on-site, and the Project would not directly or indirectly destroy a unique geologic feature. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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<sup>87</sup> City of Los Angeles Bureau of Engineering, Sewer System, <https://data.lacity.org/City-Infrastructure-Service-Requests/Sewer-System/7aty-5ywx>, accessed December 27, 2021.

## 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Gases that trap heat in the atmosphere are called greenhouse gases (GHGs) since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions, and to establish targets and emission reduction strategies for GHG emissions in California. Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's GHG emissions.

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

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

## IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Potentially Significant Impact.** While the types and amount of hazardous materials potentially used in connection with the construction and operation of the Project are anticipated to be typical of those used for residential, neighborhood-serving commercial, municipal office, and senior community center uses, the Project operations would likely involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Accordingly, further analysis of this issue will be provided in the EIR.

**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?**

**Potentially Significant Impact.** The Project Site is located in a City-designated methane zone.<sup>88,89</sup> Additionally, several of the existing buildings within the Project Site are 50 or more years old (all of which would be demolished as part of the Project); therefore, asbestos containing materials and lead-based paint may be present. As such, further analysis in the EIR is required to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

**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?**

**Potentially Significant Impact.** Nora Sterry Elementary School and New Horizon School are located within 0.25-mile of the Project Site. While the Project is not expected to involve hazardous emissions or handle acutely hazardous materials, substances, or waste, further evaluation of this topic will be included in the EIR due to the proximity of the schools.

**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?**

**Potentially Significant Impact.** The Project Site may appear on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, properties in the surrounding area have the potential to be listed on various environmental databases. Therefore, further evaluation of this issue will be included in the EIR.

**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 located approximately 1.6 miles northeast of the Santa Monica Municipal Airport. Based on a report published by the Santa Monica Airport, the Project Site is not located within the Santa Monica Airport Planning Boundary/Airport Influence Area. In addition, the Santa Monica Airport is anticipated to be closed in 2028.<sup>90</sup> Given the distance between the Project Site and the Santa Monica Municipal Airport, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

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<sup>88</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>89</sup> The Project Site is located within the City of Los Angeles and is therefore subject to the City's methane code; not the County's.

<sup>90</sup> City of Santa Monica, Consent Decree to Close Santa Monica Airport Affirmed in Recent Decisions, [www.santamonica.gov/press/2020/10/20/consent-decree-to-close-santa-monica-airport-affirmed-in-recent-decisions#:~:text=The%20Consent%20Decree%20requires%20the,permanently%20after%20December%2031%2C%202028](http://www.santamonica.gov/press/2020/10/20/consent-decree-to-close-santa-monica-airport-affirmed-in-recent-decisions#:~:text=The%20Consent%20Decree%20requires%20the,permanently%20after%20December%2031%2C%202028), accessed March 14, 2022.

**Potentially Significant Impact.** According to the City’s General Plan Safety Element, the nearest disaster route to the Project Site is Santa Monica Boulevard, which is located immediately north of the Project Site.<sup>91,92</sup> While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. In addition, site access improvements will be implemented as part of the Project. Accordingly, further analysis of this topic will be included in the EIR.

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

**No Impact.** The Project Site is located in an urbanized area without any wildlands on the Site or in the vicinity. The Project Site is also not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.<sup>93,94</sup> Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety, and the proposed uses would not create a fire hazard that has the potential to exacerbate wildfire risks. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires, and, as such, no impact would occur. No further evaluation of this topic in the EIR is required.

**X. HYDROLOGY AND WATER QUALITY**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>91</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, p. 61.

<sup>92</sup> The Los Angeles County Safety Element identifies Freeway and Highway Disaster Routes; however, since the Project Site is not located within an unincorporated area of the County, the County’s Safety Element does not address the Project Site. As such, the analysis is based on the applicable state and City plans and regulations.

<sup>93</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN’s 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>94</sup> City of Los Angeles General Plan Safety Element, November 1996, Exhibit D, Selected Wildfire Hazard Areas, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

**Potentially Significant Impact.** Project construction activities would have the potential to convey pollutants into municipal storm drains, particularly during precipitation events. In addition, potential changes in on-site drainage patterns resulting from Project implementation and the introduction of new land uses could affect the quality of storm water runoff. Therefore, further analysis of this issue will be included in the EIR.

**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?**

**Potentially Significant Impact.** A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement or includes the withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. Given the largely impervious (developed/paved) nature of the Project Site, changes to existing groundwater recharge are not anticipated as a result of Project implementation. During a storm event, stormwater runoff would continue to flow to the adjacent roadways where it is directed

into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions. However, the proposed excavation activities for subterranean parking would extend to a maximum depth of 52 feet and have the potential to encounter groundwater, which was encountered at a depth of 58 feet below the existing ground surface but has shown a historically high groundwater level of 25 feet. Therefore, further analysis of this issue will be provided in the EIR.

**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;**

**Potentially Significant Impact.** As discussed in Response to Checklist Question VII.b., potential erosion impacts resulting from Project grading, excavation, and other construction activities that have the potential to disturb existing soils would be adequately reduced through compliance with LADBS grading permits, LAMC requirements, and the City's LID ordinance. However, given the potential for changes to existing drainage patterns on-site as a result of Project development, further evaluation of erosion and siltation in the context of potential hydrological changes on-site will be provided in an EIR.

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

**Potentially Significant Impact.** Potential changes in drainage patterns on-site could affect the rate or amount of surface water runoff on-site in a manner that could result in flooding on- or off-site. Thus, further analysis of this topic will be included in an EIR.

**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**

**Potentially Significant Impact.** Potential changes in drainage patterns on-site could create or contribute runoff which could exceed the capacity of the local stormwater drain system, and Project construction activities as well as the introduction of new land uses could provide additional sources of polluted runoff. Therefore, further analysis of this topic will be included in an EIR.

**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<sup>.95,96</sup> Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in the EIR is required.

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<sup>95</sup> Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1590G, effective April 21, 2021.

<sup>96</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

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

**Potentially Significant Impact.** A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The General Plan Safety Element does not map the Project Site within a tsunami hazard area. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche. Therefore, no tsunami or seiche events would be expected to impact the Project Site. However, the Project Site is mapped by the City as within a potential inundation area.<sup>97</sup> As such, the EIR will evaluate flood hazards and any associated release of pollutants due to Project Site inundation.

**e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Potentially Significant Impact.** As discussed above, Project construction activities would have the potential to convey pollutants into municipal storm drains, particularly during precipitation events. In addition, potential changes in on-site drainage patterns resulting from Project implementation and the introduction of new land uses could affect the quality of storm water runoff. The proposed excavation activities for subterranean parking would extend to a maximum depth of 52 feet and would have the potential to encounter groundwater, which was encountered at a depth of 58 feet below the existing ground surface but has shown a historically high groundwater level of 25 feet. As such the Project could require dewatering activities. Therefore, further analysis of this topic will be included in an EIR.

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a. Would the project physically divide an established community?**

**Less than Significant Impact.** As previously discussed, the Project Site is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. Specifically, the County Property is currently occupied by the former

<sup>97</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

36,995-square-foot West Los Angeles Courthouse building, which was built in 1958 and has been closed since 2013, and associated surface parking lots as well as a vacant site along Santa Monica Boulevard and Purdue Avenue (to the east). The City Property is currently occupied by the West Los Angeles Municipal Building (built in 1960), the Felicia Mahood Multipurpose Center, the Open Space Bandstand, and associated surface parking lots. Moreover, the Library and LAPD Parcels are occupied by the West Los Angeles Regional Branch Library (built in 1956) and the LAPD Maintenance Facility.

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including residential, commercial, office, and public facilities/institutional uses. Properties to the north along Santa Monica Boulevard are developed with low-rise, single-story commercial buildings with community-serving uses (including but not limited to retail and restaurant uses) and a mid-rise, six-story mixed-use multi-family residential and commercial building. Properties to the east of the Project Site along Corinth Avenue are developed with low- to mid-rise residential and commercial buildings, a single-story commercial/restaurant building, and a mid-rise commercial office building. Properties to the south of the Project Site along Iowa Avenue are developed with multi-family residential uses within low-rise buildings and a low-rise church building. Properties to the west of the Project Site along Butler Avenue include low- to mid-rise municipal, institutional, residential, and commercial buildings, including several low- to mid-rise multi-family residential buildings, a church, and mid-rise commercial buildings.

As discussed in Section 3, Project Description, of this Initial Study, the Project proposes to redevelop the existing West Los Angeles Civic Center and West Los Angeles Courthouse with a new mixed-use development consisting of residential, neighborhood-serving commercial, municipal office, and senior community center uses. These uses would be provided within nine new structures within the Project Site. All proposed development would occur within the boundaries of the Project Site and would not require removal of any adjacent properties or the permanent closure of any surrounding streets. In addition, the Project would not introduce new uses to the surrounding community that are not already within the Project Site and in the surroundings. Overall, the Project would replace existing older buildings with a new, environmentally sustainable mixed-use development that respects and enhances the Project Site and its surroundings. In particular, the Project would be designed to strengthen the neighborhood character and to retain and enhance the Project Site's evolving civic center concept initiated in the 1920s and expanded in the 1950s and 1960s for the 21st century. The proposed buildings would continue the diverse mix of uses and scale of buildings surrounding the Project Site. Moreover, the Library and LAPD Maintenance Facility within the Project Site will remain and would continue to serve City functions.

The Project would also enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, portions of the Project Site along Santa Monica Boulevard would facilitate an active and vibrant pedestrian corridor with retail and restaurant uses. New landscaping extending from the existing West Los Angeles Regional Branch Library to the west and leading to the Project Site's northeast anchor, the Felicia Mahood Multipurpose Center, would invite pedestrians along its edges and into the Civic Plaza. From the northeast corner along Corinth Avenue, the buildings would seamlessly transition from senior center/commercial to residential uses. At the intersection of Idaho Avenue with Corinth Avenue, generous landscaping would create a gateway into the new community, inviting surrounding local residents into the Civic Plaza. Along the southern perimeter, Iowa Avenue would be lined with trees

and sidewalks at a scale that aligns with adjacent residential streets, encouraging a walking experience. Butler Avenue, the western edge of the Project Site, would serve the active commercial functions, including public parking ingress/egress, trash, and loading, as well as transitioning into a residential element at Iowa Avenue. Dedicated and secure green areas would be nestled around the residential buildings, with many ground-level courtyards visually connected to the core circulation of the Project Site, thereby promoting a safe pedestrian experience. Exterior lighting would enhance buildings, entrances, landscapes, and pedestrian paths while increasing security.

Additionally, the Project would provide a network of public and private open space throughout the Project Site. Public ground level open space would be configured around the axis formed by the Courthouse Arts Pavilion (the former Courthouse building), the Municipal building, the Beacon, and the Felicia Mahood Multipurpose Center. A large plaza, referred to herein as the Civic Plaza, would be located in between the Beacon building and the relocated bandstand and would feature a large flexible area for gatherings, movie nights, concerts, yoga, street fairs, and arts programming. The Civic Plaza would be surrounded by terraced decks, outdoor restaurant space, and ground-level Felicia Mahood Senior Center uses. The Project would also feature a publicly accessible walkway along the Purdue Avenue axis, referred to herein as Purdue Paseo, that would be lined with commercial uses and outdoor dining on the north and transition to a residential walkway that opens to Iowa Avenue on the south. The Purdue Paseo would be designed to support weekly farmers market stalls and to accommodate a variety of public uses. The Project would also provide a central dog park for residents, accessible from the sidewalk and the Purdue Paseo, between the Municipal and Corinth House buildings. A new garden along the Library frontage and sides would weave the overall Project Site.

Based on the above, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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?**

**Potentially Significant Impact.** As discussed in Section 3, Project Description, of this Initial Study, the portion of the Project on the City Property requires several discretionary approvals, while the portion of the Project on the County Property would only require ministerial site plan review approval. While the Project is not anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, the EIR will provide further analysis of the Project's consistency with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

## XII. MINERAL RESOURCES

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

**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. California’s Geological Survey (State Department of Conservation, Division of Mines and Geology) identifies deposits of regionally-significant aggregate resources. These clusters or belts of mineral deposits are designated as Mineral Resources Zones (MRZ-2s). There are four major MRZ-2 zones (i.e., Little Rock Creek Fan, Soledad Production Area, Sun Valley Production Area, and Irwindale Production Area) designated in the County and the Project Site is outside of these Mineral Resources Zones. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.<sup>98,99,100</sup> The Project Site is also not located within a City-designated oil field or oil drilling area.<sup>101</sup> Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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.** See Response to Checklist Question XII.a., Mineral Resources, above. Except for Mineral Resources Zones, the County does not have any locally-important mineral resources

<sup>98</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

<sup>99</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

<sup>100</sup> City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

<sup>101</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.

specifically delineated in the General Plan.<sup>102</sup> No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

### XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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?**

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

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

**Potentially Significant Impact.** Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. With regard to operation, the Project could generate groundborne vibration associated with vehicle circulation, delivery trucks, and building mechanical equipment. As such, the Project would have the potential to generate excessive

<sup>102</sup> Figure 9-6 Mineral Resources of the Los Angeles County General Plan 2035. [https://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-6\\_mineral\\_resources.pdf](https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-6_mineral_resources.pdf).

groundborne vibration and noise levels during short-term construction activities and on-site operations. Therefore, further evaluation of this topic will be provided in the EIR.

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

**No Impact.** The Project Site is located approximately 1.6 miles northeast of the Santa Monica Municipal Airport. As discussed above, based on a report published by the Santa Monica Airport, the Project Site is not located within the Santa Monica Airport Planning Boundary/Airport Influence Area. In addition, the Santa Monica Airport is anticipated to be closed in 2028.<sup>103</sup> Therefore, the Project would not expose people that reside or work in the Project area to excessive noise levels from these sources of noise. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

#### XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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)?**

**Potentially Significant Impact.** The Project proposes to redevelop the existing West Los Angeles Civic Center and West Los Angeles Courthouse with a new mixed-use development consisting of residential, neighborhood-serving commercial, office, and senior community center uses. Specifically, the Project would provide 926 housing units, including 495 market-rate and 431 income-restricted housing units, 70,965 square feet of neighborhood-serving commercial uses, 76,341 square feet of municipal office uses, and 25,846 square feet of senior community center uses. As development of the Project would induce population growth, further evaluation of this topic will be provided in the EIR.

<sup>103</sup> City of Santa Monica, Consent Decree to Close Santa Monica Airport Affirmed in Recent Decisions, [www.santamonica.gov/press/2020/10/20/consent-decree-to-close-santa-monica-airport-affirmed-in-recent-decisions#:~:text=The%20Consent%20Decree%20requires%20the,permanently%20after%20December%2031%2C%202028](http://www.santamonica.gov/press/2020/10/20/consent-decree-to-close-santa-monica-airport-affirmed-in-recent-decisions#:~:text=The%20Consent%20Decree%20requires%20the,permanently%20after%20December%2031%2C%202028), accessed March 14, 2022.

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

**No Impact.** As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by several City municipal services, community-serving spaces, and the former West Los Angeles Courthouse building. As no housing currently exists on the Project Site, the construction of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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?**

**Potentially Significant Impact.** The City of Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services for the Project Site. The Project would increase the floor area and associated occupancy on-site which would result in the need for additional fire protection services during Project operation. Therefore, further analysis of this issue will be included in the EIR.

**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?**

**Potentially Significant Impact.** Police protection for the Project Site is provided by the City of Los Angeles Police Department (LAPD). The Project would increase the floor area and associated occupancy on-site which would result in the need for additional police services during Project operation. Additionally, construction sites can be sources of nuisances and hazards and invite theft and vandalism. Therefore, the EIR will provide further analysis of this issue.

**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?**

**Potentially Significant Impact.** The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD), which is divided into six local districts. The Project Site is located in Local District West and is served by Daniel Webster Middle School, Nora Sterry Elementary School, and University High School Charter. The Project would increase the residential population and therefore, result in a direct increase in the number of students within the LAUSD service area due to the introduction of a residential population. Therefore, the EIR will provide further analysis of this issue.

**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?**

**Potentially Significant Impact.** The development of the Project's residential uses would generate a new population at the Project Site that could utilize nearby public parks and/or recreational facilities. Thus, the EIR will provide further analysis of this issue.

**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?**

**Potentially Significant Impact.** As described above in Section 3, Project Description, the Project Site is currently occupied by the former West Los Angeles Courthouse building, several City municipal services, and community-serving spaces, including the West Los Angeles Municipal Building, the Felicia Mahood Multipurpose Center, and the West Los Angeles Regional Branch Library. The West Los Angeles Courthouse building has been closed since 2013. The Project would remove the West Los Angeles Courthouse building within the County Property and replace the Municipal building<sup>104</sup> and the Felicia Mahood Multipurpose Center within the City Property. The Library will remain in its

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<sup>104</sup> It is noted that the Project would preserve the front, northernmost façade of the existing Municipal building, the bronze screen (or brise soleil) with glass tiles on the eastern façade of the existing Courthouse building, and the roof of the existing bandstand structure (which would be refurbished and used as part of the new Open Space Bandstand).

existing condition. As the removal of the West Los Angeles Courthouse building and replacement of the Municipal building and the Felicia Mahood Multipurpose Center (as the Felicia Mahood Senior Center) are part of the Project, the Project’s construction assumptions and associated analyses to be included in the Draft EIR will encompass these proposed activities. As such, the potential impacts associated with demolition of the West Los Angeles Courthouse building and replacement of the Municipal building and the Felicia Mahood Multipurpose Center (as the Felicia Mahood Senior Center) will be further evaluated in the Draft EIR.

Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through web-based resources. The new residential population generated by the Project may result in additional demand for library services provided by the LAPL, possibly necessitating the construction of new libraries which could cause significant environmental impacts. Therefore, further analysis of this topic in the EIR is required to determine the Project’s potential impacts on library services provided by the LAPL.

## 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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?**

**Potentially Significant Impact.** As discussed above in Response Checklist Question XV.d, the new residential population associated with the Project could result in an increased demand for public parks and recreational facilities that serve the Project Site. Therefore, further analysis of this topic in the EIR is required to determine the Project’s potential impacts on parks and recreational facilities provided by the City.

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

**Potentially Significant Impact.** As previously discussed, the Project would incorporate a variety of open space and recreational amenities throughout the Project Site. Specifically, the Project would

provide a total of approximately 193,000 square feet of private, common, and publicly accessible open space, of which 112,382 square feet would comply with the LAMC definition of open space. Of the 112,382 square feet of open space, approximately 30,741 square feet would be public open space and 81,423 square feet would include interior and exterior private and common open space for residents only. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts with regard to recreational facilities which might have an adverse physical effect on the environment.

## 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. In addition, operation of the Project would generate vehicle and transit trips. The resulting increase in the use of the Project area's transportation facilities could conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, further analysis of this issue will be provided in the EIR.

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

**Potentially Significant Impact.** SB 743, which went into effect in January 2014, required the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA

Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

Project development and the associated increase in employment would increase VMT over existing conditions. Therefore, further analysis of this issue will be provided in the EIR.

**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)?**

**Potentially Significant Impact.** The Project would not introduce hazards due to incompatible uses such as farm equipment. However, the Project would include new access improvements to the Project Site. As such, further analysis of this issue will be provided in the EIR.

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

**Potentially Significant Impact.** According to the City’s General Plan Safety Element, the nearest disaster route to the Project Site is Santa Monica Boulevard, which is located immediately north of the Project Site.<sup>105,106</sup> While it is expected that the majority of Project construction activities would be confined on site, limited off site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. In addition, the Project would include new access improvements to the Project Site. Therefore, further analysis of this issue will be provided in the EIR.

## 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>105</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, p. 61.

<sup>106</sup> The Los Angeles County Safety Element identifies Freeway and Highway Disaster Routes; however, since the Project Site is not located within an unincorporated area of the County, the County’s Safety Element does not address the Project Site. As such, the analysis is based on the applicable state and City plans and regulations.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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.

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

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

**Potentially Significant Impact (Checklist Questions XVIII.a. and b.).** AB 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074. As specified by AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. AB 52 consultation between the County, as lead agency, and Native American tribes has not yet occurred.

As noted above, the Project would require excavations of up to approximately 52 feet, which could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the County will notify all applicable tribes, and the County will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

## XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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?**

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

With regard to stormwater drainage, as discussed above in Response to Checklist Question X.c.iii., the Project would have the potential to alter the existing drainage pattern of the Project Site and affect the amount of stormwater runoff. Therefore, further analysis of this issue will be included in the EIR.

With respect to telecommunications facilities, the Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Analysis of these improvements will be evaluated in the EIR as part of overall Project impacts.

**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?**

**Potentially Significant Impact.** LADWP supplies water to the Project Site. Given the Project's increase in floor area on the Project Site and the associated resident, visitor, and employee population, the Project would increase demand for water provided by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

**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?**

**Potentially Significant Impact.** Refer to Response to Checklist Question XIX.a., above. As discussed therein, the Project would result in an increase in wastewater generation from the Project Site. Therefore, further analysis of this issue will be provided in the EIR.

**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?**

**Potentially Significant Impact.** The City's Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, and private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Given the Project's increase in floor area on the Project Site and the associated resident, visitor, and employee population, the Project would result in an increase in solid waste generation from the Project Site. Therefore, further analysis of this issue will be provided in the EIR

**e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Potentially Significant Impact.** It is expected that Project development would comply with federal, state, and local statutes and regulations related to solid waste. Resulting impacts likely would be less than significant. Nonetheless, the EIR will include an evaluation of the Project's compliance with solid waste statutes and regulations in connection with the analysis of potential impacts related to solid waste generation, as described in Response to Checklist Question XIX.d.

## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

**No Impact.** As discussed above, Project Site is located in an urbanized area, and is developed with relatively flat topography. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.<sup>107,108</sup> Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts related to impairing an adopted emergency response plan or emergency evaluation plan within a wildfire area. No impacts regarding wildfire risks or related post-fire conditions would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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?

<sup>107</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 4261010908, 4261011909, 4261011910, 4261011911, 4261011913, 4261011914, and 4261011915.

<sup>108</sup> City of Los Angeles General Plan Safety Element, November 1996, Exhibit D, Selected Wildfire Hazard Areas, p. 53.

**No Impact.** As discussed above, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. In addition, there is no accumulation of dry vegetation within the Project Site to fuel wildfires, or wildlands or steep slopes located in the vicinity of the Project Site or frequent strong wind events to exacerbate wildfires. Therefore, as the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and due to the flat topography of the Project Site and surrounding area, the Project would not result in impacts related to exacerbating wildfire risks. No impacts regarding wildfire risks or related post-fire conditions would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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?**

**No Impact.** As discussed above, the Project Site is located in an urbanized area, and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. As the Project Site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones, the Project would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, or emergency water sources to assist with fire suppression in a wildfire area. Therefore, while the Project could require utility improvements to connect the new buildings to the main infrastructure, such improvements would not be located within or near state responsibility areas or lands classified as very high fire hazard severity zones and would not be considered wildfire area associated infrastructure. No impacts regarding wildfire risks or related post-fire conditions would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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?**

**No Impact.** As previously described, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As such, a wildfire which could result in downstream flooding, landslides, runoff, or other post-fire instability after the wildfire has been extinguished could not occur at the Project Site as no such conditions exist on the Project Site. No impacts regarding wildfire risks or related post-fire conditions such as landslides or slope instability would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

## XXI.MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** As discussed above, the Project Site is located in a highly urbanized area and does not serve as sensitive habitat for protected fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site. Therefore, the Project would not have the potential to 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.

As discussed above, the Project’s potential environmental impacts for the following subject areas will be further analyzed in the EIR: air quality; cultural resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; population and housing; public services (fire protection, police protection, schools, parks, and libraries); recreation; transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, solid waste, and energy infrastructure).

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

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

Regarding aesthetics, pursuant to SB 743, the Project is considered an employment center project on an infill site within a transit priority area, and thus in accordance with PRC Section 21099(d)(1), the Project’s aesthetic impacts shall not be considered significant impacts on the environment. Given the level of urbanization and transit in the vicinity of the Project Site, the majority of related projects would likewise be subject to SB 743 and could not combine with the Project to generate cumulative impacts under CEQA. Any related projects that are not subject to SB 743 would require appropriate analysis of potential impacts and mitigation, as necessary, to reduce such impacts to the extent feasible. As such, cumulative impacts regarding aesthetics would be less than significant.

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

As it relates to biological resources, the Project Site and surroundings are located in a highly urbanized area, and similar to the Project, other developments in the vicinity of the Project Site would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the adjacent rights-of-way. Like the Project, related projects involving tree removals would be required to comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative effect, and cumulative impacts would be less than significant.

As discussed above, the Project Site is located in an urbanized area and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. 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.

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

**Potentially Significant Impact.** Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; population and housing; public services (fire protection, police protection, schools, parks, and libraries); recreation; transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, solid waste, and energy infrastructure). As a result, these potential effects will be analyzed further in the EIR.