

**Evidence Supporting a Class 32 Categorical Exemption Per
CEQA Guidelines Section 15332 (In-Fill Development Projects)**

**10401-10417 Washington Blvd & 3855 Motor Avenue
Los Angeles, CA 90232**

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I. INTRODUCTION

1. INTRODUCTION

The subject of this Categorical Exemption is the proposed Project located at 10401-10417 Washington Boulevard and 3855 Motor Avenue in the Palms – Mar Vista – Del Rey Community Plan area of the City. The project site is comprised of five contiguous parcels with a lot area of 32,876.86 square feet. The project site is currently developed with a 24,382 square-foot (sf) building consisting of 33 apartments located at 3855 Motor Avenue (APN: 4208-007-037) which will remain., a 10,080 sf building consisting of a thrift store located at 10401 Washington Blvd (APN: 4208-007-015) , and a 3,684 SF single story auto garage that is vacant/closed located at 10417 Washington Boulevard (APN: 4208-007-012)

The Project proposes the demolition of the thrift store and auto garage buildings on Washington Boulevard (uses on Motor Ave. will remain) and construction of an 8-story, 85 feet in height addition to the building at 3855 Motor with 112 new residential units and 2,000 sf ground-floor commercial uses for a total of 145 residential units within the building. Of the 145 units, 15 units would be Extremely Low Income affordable units. The Project includes one level of subterranean parking located beneath the new addition. This analysis assumes the Project will begin construction in 2021 and will be operational in 2023. The Project is discussed in further detail in Section II (Project Description) of this report.

2. PROJECT INFORMATION

Project Title: WA-MO Mixed Use Project

Project Applicant: CLG WM, LLC
10600 Santa Monica Boulevard
Los Angeles, CA 90025

Project Location: 3855-3859 S. Motor Avenue; and 10401-10417 W. Washington Boulevard
Los Angeles, CA 90232

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

3. PURPOSE AND CONTENTS OF THE CATEGORICAL EXEMPTION

The *State CEQA Guidelines* Section 15332 states that a Class 32 Exemption consists of projects characterized as in-fill development meeting the conditions described below:

- a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- c) The project site has no value as habitat for endangered, rare or threatened species.

- d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- e) The site can be adequately served by all required utilities and public services. This Class may be used where above-noted conditions (a) through (e) are fulfilled, where it can be seen with certainty that the proposed project could not have a significant effect on the environment.

This exemption is intended to promote infill development within urbanized areas. The class consists of environmentally benign in-fill projects which are consistent with local general plan and zoning requirements. This class is not intended to be applied to projects which would result in any significant traffic, noise, air quality, or water quality effects. Application of this exemption, as all categorical exemptions, is limited by the factors described in The *State CEQA Guidelines* Section 15300.2.

For a proposed project to qualify, it must be able to demonstrate that it does not fall under the following Exceptions:

- a) The project and successive projects of the same type in the same place will result in cumulative impacts.
- b) There are unusual circumstances creating the reasonable possibility of significant effects.
- c) The project may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within an officially designated scenic highway.
- d) The project is located on a site that the Department of Toxic Substances Control and the Secretary of the Environmental Protection have identified, pursuant to Government code section 65962.5, as being affected by hazardous wastes or clean-up problems.
- e) The project may cause a substantial adverse change in the significance of an historical resource.

4. ORGANIZATION OF THE REPORT

This Categorical Exemption is organized as follows:

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

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

III. Categorical Exemption Analysis: This section contains an assessment and discussion of impacts for each environmental issue identified in Section 3 above.

II. PROJECT DESCRIPTION

1. PROJECT APPLICANT

The Applicant for the WA-MO mixed-use Project (the “Project”) is CLG WM, LLC (the “Applicant”).

2. ENVIRONMENTAL SETTING

A. Project Location

The Project is located at 10401-10417 Washington Boulevard and 3855 Motor Avenue in the Palms – Mar Vista – Del Rey Community Plan area of the City. The project site is comprised of five contiguous parcels with a lot area of 32,876.86 square feet. The project site is currently developed with a four-story, 24,382 square-foot (sf) building consisting of 33 apartments located at 3855 Motor Avenue (APN: 4208-007-037) which will remain, a 10,080 sf building consisting of a thrift store located at 10401 Washington Blvd (APN: 4208-007-015), and a 3,684 SF single story auto garage that is vacant/closed located at 10417 Washington Boulevard (APN: 4208-007-012).

The Project proposes the demolition of the thrift store and auto garage buildings on Washington Boulevard (uses on Motor Ave. will remain) and construction of an 8-story, 85 feet in height addition to the building at 3855 Motor with 112 new residential units with 15 affordable units and 2,000 sf ground-floor commercial uses for a total of 145 residential units within the building. The Project includes one level of subterranean parking located beneath the new addition. The L-Shaped Project Site is located within Council District 5 of the City and is within a Tier 3 Transit Oriented Community (TOC). Regional access to the Project Site is provided by Interstate 10, located approximately 0.77 miles north of the Project Site and Interstate 405, located approximately 0.95 miles west of the Project Site. Land uses immediately surrounding the Project Site include adjacent multi-family residences to the north, and commercial uses to the west, east and to the south across Washington Boulevard (see Figure II-1, Aerial Photograph of the Project Site). Direct local access to the Project Site is provided by Washington Boulevard and Motor Avenue.

B. Existing Site Zoning and Land Use Designations

The northern most parcel on Motor Avenue with 6,182 square feet of lot area is zoned R4-1 and the remaining four parcels with 26,694 square feet of lot area are zoned C2-1. The R4 zoned parcel has a General Plan land use designation of High Medium Residential and the C2 zoned parcels have a land use designation of General Commercial as set forth in the Palms – Mar Vista – Del Rey Community Plan. . According to the Los Angeles Planning and Zoning Code (Zoning Code), the R4 zone is a Multi-Family zone which permits multi-family residential uses and the C2 zone is a commercial zone, and allows for C1.5 uses (limited commercial), retail with limited manufacturing, service stations and garages, businesses, churches, schools, auto Sales, and R4 uses (multiple dwellings). The C2 and R4 zone both permit the Project’s proposed residential use and the Project’s commercial use is located within the C2 zone which is permitted. The C2 and R4 zone permits a residential density of one dwelling unit per 400 square feet of lot area. In the C2 Zone, the “1” height district permits a 1.5 floor area ratio (FAR) and no direct height limit. In the R4 Zone, the “1” height district permits a 3:1 FAR and no direct height limit.

3. PROJECT CHARACTERISTICS

A. Project Features

The Project proposes the demolition of the existing uses on Washington Boulevard (existing residential building and units on Motor Avenue will remain), and the construction of an approximately 91,889 square-foot, 8-story 85 feet in height mixed-use addition to the Motor building to remain with 112 residential units, of which 85 would be classified as studios and 27 one-bedroom units. With the addition, the building would contain 145 units, including 15 affordable units. The Project also includes 2,000 sf of ground-floor restaurant space fronting Washington Boulevard. Approximately 4,300 square feet of private open space and 4,573 square feet of common open space is proposed to serve the Project's residents. The Project includes 71 new parking spaces in one level of subterranean parking, one level of at-grade parking, and one level of above-grade parking for the commercial and residential uses (i.e., 57 residential parking spaces and 14 commercial parking spaces). The Project would retain 34 existing parking spaces in the existing building for a total of 105 spaces. Vehicular access would be provided via two driveways on Motor Avenue (one existing), a driveway on Washington Boulevard, and a driveway on the rear alley. This analysis assumes the Project will begin construction in 2021 and will be operational in 2023. The Project Site Plan is shown below in Figure II-2, Project Site Plan.

Figure II-1 Aerial Photograph of Project Site

Figure II-2 Project Site Plan

In accordance with the Palms – Mar Vista – Del Rey Community Plan and Citywide Design Guidelines, the proposed building provides a variety of architectural materials and building planes and ground-level façade transparency, with special attention to the surrounding area while also providing a pedestrian friendly environment. Additionally, the Project is designed to complement the scale and grain of the existing neighborhood while contributing an architecturally unique building to a major transportation area (i.e., a Tier 3 TOC). The design of the proposed building alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest and to avoid repetitive facades. Moreover, the proposed Project is designed and oriented to connect the Project Site with the Washington Boulevard and Motor Avenue frontages.

The proposed building would meet and/or exceed all City Building Code and Title 24 requirements. As such, the building would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star®-rated appliances, water saving/low-flow fixtures, non-volatile organic compound paints/adhesives, drought-tolerant planting, and a high-performance building envelopment.

B. Access and Parking

The Project includes 71 parking spaces in one level of subterranean parking, one level of at-grade parking, and one level of above-grade parking for the commercial and residential uses (i.e., 57 residential parking spaces and 14 commercial parking spaces). 34 spaces located within the existing building footprint would remain. Vehicular access would be provided via two driveways on Motor Avenue (one existing), a driveway on Washington Boulevard, and a driveway on the rear alley. To encourage and facilitate the use of public transportation and bicycle use by residents and patrons, the Project would include 89 bicycle parking spaces (8 short-term bicycle parking spaces, and 81 long-term bicycle parking spaces).

C. Construction

The Project would be constructed over approximately 15 months and would begin 2021 and would be operational by 2023. Construction activities would include, demolition, grading, excavation, and building construction. Demolition would occur for approximately one month, grading, excavation, and foundation preparation activities would occur over approximately one month, and building construction would occur over approximately 13 months.

The Project would require the export of approximately 8,881 cubic yards of soil from the Project Site. No soil would be imported. The likely haul route would allow trucks to reach the Project Site via Interstate 10 and Interstate 405. Exported materials would likely be disposed at the Scholl Canyon Landfill, Bradley Landfill and Recycling Center in Sun Valley, and/or at the Atkinson Brickyard site in the City of Compton.

4. DISCRETIONARY ACTIONS AND APPROVALS

The Department of City Planning is the lead agency for the Project. In order to permit development of the Project, the following discretionary actions are required:

1. Pursuant to CEQA Guidelines, Section 21080 of the California Public Resources Code, and Article 19 and Section 15332 (Class 32 – Infill Development) there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;

2. Pursuant to LAMC Section 12.22.C.31, Density Bonus Compliance Review for a Tier 3 TOC project with Additional Incentives for reduced open space, to permit RAS3 setbacks in the C2 zoned portion, and to permit FAR averaging.
3. Pursuant to LAMC Section 16.05.C.1.b, Site Plan Review for the addition of 112 units to an existing building.
4. Pursuant to LAMC Section 12.32.R, a Building Line Removal to remove a 20 feet building line (Ordinance No. 60771) along Washington Boulevard.
- 5.

The Project will also require other permits as necessary pursuant to various sections of the LAMC from the City of Los Angeles Department of Building and Safety (and other municipal agencies) in order to execute and implement the Project. Such approvals may include, but are not limited to grading, excavation, and building permits, landscaping plan approvals, stormwater discharge permits, permits for temporary street closures, installation and hookup approvals for public utilities, haul route approvals, and other related permits.

1) Project-Specific Noise Impacts

Consistent with Appendix G of the State CEQA Guidelines, a significant impact may occur if a project would:

- a) Generate 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; . . . or
- 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 airstrip, expose people residing or working in the project area to excessive noise levels;

a) A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Project Site to fail to comply with noise level standards set forth in the City of Los Angeles Noise Ordinance (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC). Implementation of the Project would result in an increase in ambient noise levels during both construction and operations, as discussed in detail below.

Construction Noise

Construction-related noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. As such, construction noise impacts would not be considered significant if the Project fully implements noise attenuation measures to the fullest extent possible to reduce noise impacts during construction of the proposed building, in conformance with the requirements of the LAMC.

Construction of the Project would require the use of heavy equipment for demolition, grading foundation preparation, the installation of utilities, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table III-4, Noise Range of Typical Construction Equipment, and Table III-5, Estimated Project Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

The noise levels shown in Table III-5 represent composite noise levels associated with the construction

activities that will be carried out by the Project, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction in a development such as the Project. As shown in Table III-5, construction noise during the excavation/grading and finishing periods of construction is presented as 86 dBA Leq when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance over acoustically “hard” sites (e.g., asphalt and concrete surfaces). For example, a noise level of 84 dBA Leq measured at 50 feet from the noise source to the receptor would reduce to 78 dBA Leq at 100 feet from the source to the receptor, and reduce by another 6 dBA Leq to 72 dBA Leq at 200 feet from the source to the receptor. The nearest noise sensitive receptors to the Project Site are adjacent residential uses.

**Table III-4
Noise Range of Typical Construction Equipment**

Construction Equipment	Noise Level in dBA Leq at 50 Feet ^a
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

^a Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.
Source: United States Environmental Protection Agency, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.

**Table III-5
Estimated Project Construction Noise Levels**

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Due to the use of construction equipment during the construction phase, the Project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to the previously listed noise level above in Table III-5. Specifically, based on the data provided in Table III-5, construction noise levels at the residences within 50 feet could reach 86 dB. It should be noted, however, that any increase in noise levels at off-site receptors during construction of the Project would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e. demolition and foundation work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed building) as the physical structure of the proposed structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

Similar to other development projects in the City, the Project would comply with the City’s existing noise regulations to ensure noise impacts would be less than significant. LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday.¹ The construction activities associated with the Project would comply with these LAMC requirements. In addition, the Project would implement all technically feasible noise reduction measures in compliance with the standards set forth in LAMC Section 112.05 (see RCM-1 through RCM-7 below).

Specifically, the use of barriers such as plywood structures, flexible sound control curtains, or intervening construction trailers, could reduce line-of-sight noise levels by approximately 10 dbA.² And, with the incorporation of the LAMC-required noise reduction techniques, construction noise levels could be

¹ Los Angeles Municipal Code, Section 41.40.

² Based on a review of Table 4 of the FHWA Noise Barrier Design Handbook (July 14, 2011), the design feasibility of a sound barrier that reduces noise by 5 dBA is considered “simple” and a reduction of up to 10 dBA as “attainable.” And, reductions of 15 and 20 dBA are considered “very difficult” and “nearly impossible,” respectively.

reduced by up to approximately 20 dBA.³ As previously stated, construction noise levels could reach up to approximately 86 dBA Leq. However, with the reduction of approximately 20 dBA per code-required noise reduction techniques (see RCM-1 through RCM-7, and footnotes 7 and 8 below), the resulting construction noise levels would be reduced to approximately 66 dBA Leq. These noise levels would not exceed the noise threshold of 75 dBA at 50 feet from the noise source as outlined in LAMC Section 112.05.

Thus, based on the provisions set forth in LAMC 112.05, implementation of the following regulatory compliance measures would ensure the Project be consistent with, and not violate the provisions of, the LAMC. As such, the Project would comply with the City's existing noise regulations to ensure construction noise impacts would be less than significant. The noise reduction techniques required by LAMC 41.40 and 112.05, would include the following:

RCM-1: The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 (see LAMC Section 112.05), and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels.

RCM-2: Construction shall be restricted to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

RCM-3: Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

RCM-4: Noise-generating equipment operated at the Project Site shall be equipped with the most effective and technologically feasible noise control devices, such as mufflers, lagging (enclosures for exhaust pipes), and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

RCM-5: Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

³ Estimate based on information from the United States Environmental Protection Agency, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971. Per Table V, *Noise Control For Construction Equipment* therein, use of improved mufflers/silencers would achieve approximately 10 dBA reduction and enclosures/barriers blocking line-of-sight would achieve approximately 10 dBA reduction. While the additional measures would reduce noise, it should be noted that all reductions would not be wholly additive, but would be incremental, and therefore have conservatively not been quantified in the estimated reduction.

RCM-6: Barriers including, but not limited to, plywood structures or flexible sound control curtains shall be erected around the perimeter of the construction site, and around stationary equipment as feasible (i.e., generators, air compressors, etc.), to minimize the amount of noise during construction on nearby noise-sensitive uses. Specifically, a temporary, continuous sound barrier shall be erected along the perimeter of the Project Site. Perimeter barriers shall be at least 8 feet in height and constructed of materials achieving a Transmission Loss (TL) value of at least 20 dBA, such as ½ inch plywood.⁴

RCM-7: The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048 (see LAMC Section 91.106.4.8), which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Operational Noise

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. The traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the L.A. CEQA Thresholds Guide, if a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts are assumed to be less than significant. Based on the Project's size, the Project would not have the potential to double the traffic volumes on any roadway segment in the vicinity of the Project Site. As such, the Project would not increase roadway noise levels by 3 dBA and, thus, traffic noise impacts would be less than significant.

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment, would be installed as part of the Project. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing uses on the Project Site or adjacent buildings in the Project vicinity. As such, the HVAC equipment associated with the Project would not represent a new source of noise in the Project Site vicinity. In addition, the design of this equipment would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Compliance this regulation will ensure

⁴ Based on the FHWA Noise Barrier Design Handbook (July 14, 2011), see Table 3, Approximate sound transmission loss values for common materials.

that HVAC-related noise impacts are less than significant.

Parking and Loading Noise

Noise would be generated by activities within the proposed parking garage (one level of subterranean parking, at-grade parking, and one above-grade level). Sources of noise would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking area would fluctuate with the amount of automobile and human activity. It is anticipated that parking related noise would be less than the existing surface parking and street parking noise as the Project proposes enclosed subterranean parking which would reduce noise impacts to off-site uses. In addition, parking-related noise generated by motor driven vehicles within and around the Project Site is regulated under the LAMC. Specifically, with regard to motor-driven vehicles, LAMC Section 114.02 prohibits the operation of any motor-driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. As such, noise impacts associated with the Project's parking area would be less than significant.

Operational noise from loading and unloading would be subject to LAMC Section 114.03, which prohibits loading or unloading of any vehicle, operating any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 PM and 7:00 AM of the following day. Through the Project's compliance with this regulation, potential noise impacts relating to loading and unloading would therefore be considered less than significant.

In addition, on-site residences would not be adversely impacted by elevated ambient urban noise levels because the Project would be constructed to meet and exceed Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. Specifically, as required by Title 24, the Project would be designed and constructed to ensure interior noise levels would be at or below a CNEL of 45 dBA in any habitable room of the project. As such, impacts associated with interior noise levels at the proposed residences

c) The Project Site is not located in the vicinity of a private airstrip. In addition, the Project Site is not located within an airport land use plan or within two miles of a public airport or public use airstrip. The Santa Monica Municipal Airport is the closest airport to the Project Site, located approximately 2.7 miles to the west. As such, the Project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur.

2) Project-Specific Air Quality Impacts

Consistent with Appendix G of the State CEQA Guidelines, a significant impact may occur if a project would:

- a) Conflict with or obstruct implementation of the applicable air quality plan;
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
- c) Expose sensitive receptors to substantial pollutant concentrations; and/or
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

a) A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP), or would in some way represent a substantial hindrance to employing the policies, or obtaining the goals, of that plan.

The South Coast Air Quality Management District SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the SCAQMD on March 3, 2017. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP identifies the control measures that will be implemented over a 15-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin. The future air quality levels projected in the 2016 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by the Southern California Association of Governments (SCAG) in its most current version of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted April 7, 2016. The 2016 AQMP also assumes that general development projects will include strategies (mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control measures.

For development projects, SCAQMD recommends that consistency with the current AQMP be determined by comparing the population generated by a project to the population projections used in the development of the AQMP. As mentioned above, the Project is located within the Palms – Mar Vista – Del Rey Community Plan area. As part of the City's General Plan, the Palms – Mar Vista – Del Rey Community Plan (Community Plan) was adopted in 1997 and sets forth goals, objectives, policies, and implementation programs that pertain to the Palms – Mar Vista – Del Rey area. The Community Plan

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offers projections for population, housing, and employment for the area up to the year 2010. Since the Project is expected to become operational in 2023 this report analyzes compliance with the AQMP through SCAG's population estimates in the 2016 RTP/SCS as they are the most current estimates. Projects that are consistent with SCAG's applicable growth projections would not interfere with air quality attainment because this growth is included in the projections used in the formulation of the 2016 AQMP. As such, projects, land uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. The Project would comply with all SCAQMD rules and regulations that are applicable to the Project; the Project Applicant is not requesting any exemptions from the currently adopted or proposed SCAQMD rules.

The Project proposes the demolition of the existing uses on the parcels zoned C2-1 (i.e., fronting Washington Boulevard) and the development of 112 additional residential units, 2,000 sf ground floor commercial and one level of subterranean parking. As part of its comprehensive planning process for the Southern California region, SCAG has divided its jurisdiction into 14 subregions. The Project Site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. SCAG's 2012 housing estimates for the City are 1,325,500 total housing units and estimates the housing of the City will increase to 1,690,300 housing units by 2040, a 27.5 percent increase.⁵ The Project's 112 housing units would account for less than 0.01 percent of the total housing unit growth from 2012 to 2040. Thus, the Project's relatively small increase in [population and] housing would not have the potential to conflict with the regional growth projections for the Los Angeles subregion. In addition, and further discussed herein, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Thus, the Project would not impair implementation of the AQMP, and this impact would be less than significant.

b) A significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant. Measurements of ambient concentrations of the criteria pollutants are used by the U.S. EPA and the California Air Resources Board (ARB) to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and State standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in "attainment." If the pollutant exceeds the standard, the area is classified as a "non-attainment" area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated "unclassified." Attainment status of the Basin with regard to the national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS) are shown in Table III-7, Attainment Status for the South Coast Air

⁵ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Demographics and Growth Forecast Appendix, Adopted April 2016, website: http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf, page 24 accessed: September 2020.

Basin. As shown, the Basin is in nonattainment for ozone, PM₁₀ and PM_{2.5}.

**Table III-7
Attainment Status for the South Coast Air Basin**

Pollutant	Attainment Status	
	NAAQS	CAAQS
Ozone (1-Hour)	Non-Attainment (Extreme)	Non-Attainment
Ozone (8-Hour)	Pending – Expect Non-Attainment (Extreme)	Non-Attainment
Carbon Monoxide (1- & 8-hour)	Attainment (Maintenance)	Attainment
Nitrogen Dioxide (1-Hour)	Unclassifiable/Attainment	Attainment
Nitrogen Dioxide (Annual)	Attainment (Maintenance)	Attainment
Sulfur Dioxide (1-Hour)	Designations Pending (expect Unclassified/Attainment)	Attainment
Sulfur Dioxide (24-Hour & Annual)	Unclassified/Attainment	attainment
PM ₁₀ (24-Hour)	Attainment (Maintenance)	Non-Attainment
PM ₁₀ (Annual)	N/A	Non-Attainment
PM _{2.5} (24-Hour)	Non-Attainment (Serious)	N/A
PM _{2.5} (Annual)	Non-Attainment (Moderate)	Non-Attainment
Lead	Non-Attainment (Partial)	Attainment
Source: SCAQMD, Air Quality Management Plan Appendix II website: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-ii.pdf?sfvrsn=4 , accessed: September 2020.		

Because the South Coast Air Basin is currently in nonattainment for ozone, PM₁₀ and PM_{2.5}, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.⁶

A project may have a significant impact if project-related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. The Project Site is located in the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin. To address potential impacts from construction and operational activities, the SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds

⁶ South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix A, August 2003.*

outlined in Table III-8, SCAQMD Thresholds of Significance, be considered significant. The City defers to these thresholds for the evaluation of construction and operational air quality impacts.

**Table III-8
SCAQMD Thresholds of Significance**

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO _x)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO _x)	150	150
Particulate Matter (PM ₁₀)	150	150
Fine Particulate Matter (PM _{2.5})	55	55
<i>Note: lbs = pounds.</i> <i>Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2; accessed: September 2020.</i>		

Regional Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 15 months, which is a conservative estimate and yields the maximum daily impacts. Construction activities would be undertaken in three main steps: (1) demolition, (2) excavation, grading and foundation preparation, and (3) building construction. Demolition would occur for approximately one month and would require the demolition of the existing uses totaling approximately 13,764 square feet. Excavation, grading, and foundation preparation would occur for approximately one month with an export of approximately 8,881 cubic yards of soil.⁷ Building construction would occur for approximately 13 months. This phase would include the construction of the proposed structure, connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the Project Site. These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod 2016.3.2) recommended by the SCAQMD to quantify the estimated daily emissions associated with Project construction. The results are presented in Table III-9, Estimated Peak Daily Construction Emissions, which identifies daily emissions that are estimated to occur on peak construction days for each construction phase.

⁷ The area of the Project Site with the proposed new subterranean garage is approximately 19,981.30 sf (i.e., the parcels currently zoned C2-1 fronting Washington Boulevard) and the Project proposes one level of subterranean parking. As such, this analysis assumes approximately 8,881 cubic yards (cy) of soil would be exported.

**Table III-9
Estimated Peak Daily Construction Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition Phase						
Fugitive Dust	--	--	--	--	0.24	0.04
Off-Road Diesel Equipment	0.80	7.25	7.60	0.01	0.41	0.39
On-Road Diesel (Hauling)	0.02	0.78	0.19	0.01	0.05	0.02
Worker Trips	0.05	0.03	0.37	0.01	0.11	0.03
Total Emissions	0.87	8.06	8.16	0.03	0.81	0.48
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Excavation/Grading/Foundation Preparation						
Fugitive Dust	--	--	--	--	0.32	0.17
Off-Road Diesel Equipment	0.80	7.25	7.60	0.01	0.47	0.39
On-Road Diesel (Hauling)	0.43	13.70	3.37	0.04	0.92	0.28
Worker Trips	0.05	0.03	0.37	0.01	0.11	0.03
Total Emissions	1.28	20.98	11.34	0.06	1.82	0.87
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	0.78	7.99	7.26	0.01	0.45	0.41
Building Construction Vendor Trips	0.05	1.65	0.48	0.01	0.11	0.03
Building Construction Worker Trips	0.44	0.30	3.42	0.01	1.05	0.28
Architectural Coatings	13.24	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.20	1.41	1.81	0.01	0.08	0.08
Architectural Coatings Worker Trips	0.09	0.06	0.64	0.01	0.21	0.06
Total Emissions	14.80	11.41	13.61	0.05	1.90	0.86
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Calculation sheets are provided in Appendix A to this report.</i>						

These calculations assume compliance with SCAQMD Rule 1113 – Architectural Coatings and appropriate dust control measures would be implemented as part of the Project during each phase of development as required by SCAQMD Rule 403 – Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes (at least three times per day), applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. As shown in Table III-9, construction-related daily emissions associated with the Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, regional construction impacts are considered to be less than significant. Localized air quality emissions are addressed under Question 3(d) below.

Regional Operational Emissions

The Project proposes the demolition of the existing uses on Washington Boulevard (uses on Motor Avenue would remain as-is) and the development of 112 additional units, 2,000 sf of ground-floor commercial space, and parking provided in one subterranean level. Operational emissions generated by area sources, motor vehicles and energy demand would result from normal day-to-day activities of the Project. The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod 2016.3.2 recommended by the SCAQMD. The results of these calculations are presented in Table III-10, Estimated Daily Operational Emissions. As shown, the net increase in operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Project would be less than significant.

Table III-10
Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Area Sources	2.44	1.78	9.97	0.01	0.19	0.19
Energy Demand	0.05	0.44	0.24	<0.01	0.04	0.04
Mobile (Motor Vehicles)	1.61	6.55	20.44	0.08	6.39	1.75
Total Project Emissions	4.10	8.77	30.65	0.09	6.62	1.98
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	2.44	1.78	9.97	0.01	0.19	0.19
Energy Demand	0.05	0.44	0.24	<0.01	0.04	0.04
Mobile (Motor Vehicles)	1.56	6.70	19.48	0.07	6.39	1.75
Total Project Emissions	4.05	8.92	29.70	0.09	6.62	1.98
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
<i>Note: Column totals may not add due to rounding from the model results. Calculation sheets provided in Appendix A to this report.</i>						

As discussed above, the mass daily construction and operational emissions generated by the Project would not exceed any of the thresholds of significance recommended by the SCAQMD. In addition, as discussed under threshold question a), the Project would not exceed SCAG projections for the City population and is therefore consistent with the AQMP. Also, as discussed below, localized emissions generated by the Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants which the Basin is in nonattainment. Thus, cumulative air quality impacts associated with the Project would be less than significant.

c) A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the

very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function. The nearest air quality sensitive receptors to the Project Site are adjacent residential uses along Washington Boulevard and Motor Avenue. There are no schools or parks within 500 feet of the Project Site.⁸

Localized Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each Source Receptor Area (SRA) and various distances from the source of emissions.

In the case of this analysis, the Project Site is located within SRA 2 covering the Northwest Coastal Los Angeles County area. The nearest sensitive receptors to the Project Site are residential uses within 25 meters. The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. The Project Site is 0.46 acres in size. Therefore, consistent with SCAQMD recommendations for sites less than one acre in size, the LSTs for a one-acre site in SRA 2 with receptors located within 25 meters have been used to address the potential localized NO_x, CO, PM₁₀, and PM_{2.5} emissions to the area surrounding the Project Site.

As shown in Table III-11, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for a one-acre site in SRA 2. Therefore, localized air quality impacts from Project construction activities on the off-site sensitive receptors would be less than significant.

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) from A-C to any level below C, and for any intersection rated D or worse where the project would increase the V/C ratio by two percent or more. Based on the Project's size, the Project does not meet the criteria for a full traffic study and would not have the potential to meet the SCAQMD criteria at any of the intersections in the Project vicinity. Thus, the Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or

⁸ City of Los Angeles, Department of City Planning, ZIMAS, accessed September 2020.

generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Therefore, impacts with respect to localized CO concentrations would be less than significant.

Table III-11
Localized On-Site Peak Daily Construction Emissions

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO _x ^b	CO	PM ₁₀	PM _{2.5}
Demolition Emissions	7.25	7.60	1.39	0.67
<i>SCAQMD Localized Thresholds</i>	<i>103.00</i>	<i>562.00</i>	<i>4.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
Excavation/Grading/Foundation Preparation	7.02	7.97	0.73	0.55
<i>SCAQMD Localized Thresholds</i>	<i>103.00</i>	<i>562.00</i>	<i>4.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	17.73	18.03	0.97	0.90
<i>SCAQMD Localized Thresholds</i>	<i>103.00</i>	<i>562.00</i>	<i>4.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings.</i>				
<i>^a The area of the Project Site with proposed demolition and improvements is 0.46 acres. Consistent with SCAQMD recommendations, the localized thresholds for all phases are based on a one-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD’s SRA 2.</i>				
<i>^b The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO₂, and are provided in the mass rate look-up tables in the “Final Localized Significance Threshold Methodology” document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels as they are associated with adverse health effects. Calculation sheets are provided in Appendix A to this report.</i>				

Toxic Air Contaminants (TAC)

As the Project consists of a mixed-use development with residential and ground floor commercial uses, the Project would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants and no toxic airborne emissions would typically result from Project implementation. In addition, construction activities associated with the Project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Moreover, construction activity would not result in long-term substantial sources of diesel particulate matter or other TAC emissions (i.e., 30 or 70 years) and would therefore not have the potential to generate significant health risks. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

d) A project-related significant adverse effect could occur if construction or operation of the proposed Project would result in generation of odors that would be perceptible in adjacent sensitive areas. According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of residential and ground-floor commercial uses, which are not

typically associated with odor complaints. Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project. The Project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. As mentioned previously, the Project would be consistent with SCAQMD Rule 1113 – Architectural Coatings. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Moreover, trash areas associated with the Project would be fully enclosed, minimizing objectionable odors. Additionally, potential on-site restaurant uses would be required to comply with existing regulations to reduce odor impacts. Therefore, potential impacts associated with objectionable odors would be less than significant

3) Project-Specific Water Quality Impacts

Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction associated with the Project would be subject to the requirements of LARWQCB Order No. R4-2012-0175, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the Los Angeles County MS4 Permit), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.⁹ ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan

⁹ California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116 et seq.

(SWPPP). Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. Therefore, potential impacts during construction of the Project would be less than significant.

Operation

With respect to water quality during operation of the Project, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, which would apply to the Project.¹⁰ This Program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the SUSMP adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant. With appropriate Project design and compliance with the applicable federal, State, local regulations, and permit provisions, impacts of the Project related to stormwater runoff quality would be less than significant.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance will require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, Department of Building and Safety (LADBS), and

¹⁰ *Ibid.*, page 97 et seq.

Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Project Site. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the Project Site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site compared to existing conditions. Therefore, impacts would be less than significant.

Condition (e). The following provides a Project-specific analysis of the impacts to utilities and public services that would serve the Project.

1) Impacts to Project-Serving Utilities and Public Services

As the Project meets the definition of an urban-infill redevelopment Project, the existing Project Site is currently served by the City's Utilities and Services including but not limited to: water treatment and infrastructure (i.e., sewer services and water supply services), solid waste disposal and recycling, natural gas and electricity, fire protection services, police protection services, schools, parks and recreation, libraries,

With respect to schools, to reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). The Developer Fee Justification Study for LAUSD was prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.¹¹ The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD.

With respect to parks and recreation, the Project would be required to make a payment per the Dwelling Unit Construction Tax to the City for the proposed construction of apartment units. Monies collected as part of the Dwelling Unit Construction Tax is placed in a "Park and Recreational Sites and Facilities Fund" and used exclusively for the acquisition and development of park and recreational sites and facilities as set forth in LAMC Section 21.10.3(d). Therefore, impacts would be less than significant.

With respect to library services, funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials. Therefore, impacts to library facilities would be less than significant and no mitigation measures are required.

¹¹ Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017.

Conclusion of Class 32 Categorical Exemption Conditions Consistency

The Project meets all five conditions enumerated for a Class 32 Categorical Exemption under CEQA, and is therefore eligible for clearance under the CEQA. Furthermore, and discussed in detail below, none of the Exceptions to grant project clearance under a categorical exemption are applicable for the Project.

B. Exceptions to a Categorical Exemption

State CEQA Guidelines Section 15300.2. Exceptions

- (a) *Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*
- (b) *Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*
- (c) *Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*
- (d) *Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*
- (e) *Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
- (f) *Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

Project Analysis

Exception (a). This exception does not apply to the Project as the Project is seeking Class 32 Categorical Exemption.

Exception (b). Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (State CEQA Guidelines Section 15130[b][1][A]).

The Project could coincide with recently completed development and potentially proposed future development within the City (Related Projects). An overview of each impact discussion is provided below, and as shown, the Project would not result in any Project-specific significant impacts, and would not have

any impacts that are individually limited but cumulatively considerable.

1) Local Land Use Plans and Zoning

The focus of this cumulative impacts analysis is on the combined impact of the Project and the proposed developments within the City, including consistency with land use plans and zoning. The cumulative impacts study area for land use and planning is the extent of the City and Related Projects.

Development of potential related projects is expected to occur in accordance with adopted plans and regulations. It is also reasonably anticipated that future development would be compatible with the zoning and land use designations of each Project Site and its existing surrounding uses. In addition, it is reasonable to assume that development under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

2) Endangered, Rare, or Threatened Species

The focus of this cumulative impacts analysis is on the combined impact of the Project and potential future related projects, including special status species and habitat.

The Project Site and surrounding areas are heavily urbanized. However, it is unknown whether or not any of the related projects contain biological resources, such as sensitive species that may be listed at the federal or State level as endangered, rare, or threatened. Nonetheless, as the Project would not result in a potentially significant impact to listed species or habitat, there is no potential for the Project to contribute to a cumulative impact.

3) Traffic

The focus of this cumulative impacts analysis is on the combined impact of the Project and potential future related projects.

With respect to construction traffic, it is unknown whether or not any of the proposed related projects would have overlapping construction schedules with the Project. However, similar to the Project, all development projects in the City would be required to submit formal construction staging and traffic control plans for review and approval by the City prior to the issuance of construction permits. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions through the duration of construction activities. It is reasonably anticipated that all City development projects would comply with this requirement, similar to the Project, and as such, the cumulative construction traffic impact would be less than significant.

As mentioned previously, the Project would not add a significant number of trips to the area. While it is unknown whether any future development projects would create a significant impact to traffic, it is assumed all future projects in the City would assess impacts to traffic and consider possible mitigation

measure to reduce any significant impacts. Moreover, as the Project would not cause a significant impact to traffic it would not contribute to a cumulative impact. Therefore, the cumulative traffic operational impact would be less than significant.

4) Noise

The focus of this cumulative impacts analysis is on the combined impact of the Project and related projects, including construction noise and operational noise.

Development of the Project in combination with related projects would result in an increase in construction noise, traffic noise, as well as on-site stationary noise sources in an already urbanized area of the City. With respect to construction impacts, it is unknown whether or not any related projects would have overlapping construction schedules with the Project. However, similar to the Project, future development projects would be required to comply with the local jurisdiction's Noise Ordinance as well as any noise-attenuating measures that may be prescribed pursuant to CEQA that require significant impacts to be reduced to the extent feasible. As such, it is anticipated that the cumulative construction noise impact would be less than significant.

With respect to cumulative traffic noise impacts, as stated previously, it is clear that the Project would not double the traffic volumes on any roadway segment or study intersection in the Project Site vicinity. It is unknown whether or not any of the future related projects would double the traffic volumes on any roadway segment or study intersection. If there were a potential cumulative noise impact, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above, and therefore, impacts would be less than significant.

5) Air Quality

The focus of this cumulative impacts analysis is on the combined impact of the Project and related projects, including consistency with air quality plans, contributing to air pollutants, exposing sensitive receptors to air pollutants, etc. The cumulative impacts air quality study area is the Basin. As discussed above, a significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant.

Because the Basin is currently in non-attainment for ozone (O₃), NO₂, PM₁₀, and PM_{2.5}, the Project, in combination with nearby planned development projects, could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project contribution, SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed using the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that, if an individual development project generates less than significant construction or operational

emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.¹²

As discussed above, the mass daily construction and operational emissions generated by the Project would not exceed any of thresholds of significance recommended by SCAQMD. Also, localized emissions generated by the Project would not exceed SCAQMD's LSTs. Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants which the Basin is in non-attainment. Cumulative air quality impacts would be less than significant.

Historical Resources

The focus of this cumulative impacts analysis is on the combined impact of the Project and the Related Projects.

The Project would result in less than significant impacts to historical resources. It is unknown whether or not any of the properties on which future development projects in the City are located contain historical resources. Any development projects that contain historical resources would be required to comply with regulations and/or safeguard measures as appropriate for that project. As the Project would not result in a significant impact to historical resources, there is no potential for the Project to contribute to a cumulative impact, and thus, the cumulative impact would be less than significant.

Exception (c). There are no unusual circumstances to the Project Site or the proposed Project that would create a reasonable possibility of significant effects to the environment. The Project Site is located within a highly urbanized setting, and the site would be redeveloped with a mixed-use building including residential and ground-floor commercial space, which are typical urban land uses appropriate for the area. Additionally, as discussed in Condition (a), above, the Project would be consistent with the City's underlying zoning and land use designation. The Lead Agency has not determined an unusual circumstance is applicable to the Project.

Moreover, as analyzed in Exception (b), above, the Project would not result in any Project-specific or cumulative traffic, noise, air quality, or water quality impacts. The proposed land use and intensity of the Project is consistent and compatible with the surrounding area and typical for an infill development located near transit and on a major City thoroughfare. Therefore, as there are no unusual circumstances regarding the proposed Project or Project Site, the exception is not applicable to the Project.

Exception (d). There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity.¹³ There are also no locally-designated scenic highways in the Project Site

¹² South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix A, August 2003.*

¹³ California Department of Transportation, *California Scenic Highway Mapping System.*

vicinity.¹⁴ Therefore, as the Project Site is not located along a State- or City-designated scenic highway, the exception is not applicable to the Project.

Exception (e). California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

There are no known hazardous sites associated with the Project Site as according to California Department of Toxic Substances Control's (DTSC) EnviroStor database,¹⁵ SWRCB's GeoTracker database,¹⁶ and DTSC's current "Cortese" list.¹⁷ Additionally, the Project involves the construction and operation of a mixed-use development with residential and commercial uses, which are not typically associated with hazardous waste. Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment in regards to siting the Project on a known hazardous waste site, and a less than significant impact would occur.

The Project Site is not located within a Methane Zone.¹⁸ Therefore, potentially hazardous impacts associated with methane would be less than significant. Therefore, as the Project Site is not located on a hazardous waste site and no potentially significant hazardous impacts would result, the exception is not applicable to the Project.

Exception (f). Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as:

- 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;
- 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or
- 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural,

¹⁴ City of Los Angeles Department of City Planning, *Mobility Plan 2035, Citywide General Plan Circulation System, Map A3 – West Subarea, September 2016.*

¹⁵ California Department of Toxic Substances Control, *EnviroStor*, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed: September 2020.

¹⁶ State Water Resources Control Board, *GeoTracker*, website: <http://geotracker.waterboards.ca.gov>, accessed: September 2020.

¹⁷ California Department of Toxic Substances Control, *Hazardous Waste and Substances Site List (Cortese)*, website: http://www.envirostor.dtsc.ca.gov/public/mandated_reports.asp, accessed: September 2020.

¹⁸ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: September 2020.

educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

1) Regulatory Framework

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register of Historical Resources (the "California Register"). The California Register is modeled after the National Register of Historic Places (the "National Register"). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant.¹⁹ The National Register, California Register, and City of Los Angeles Historic-Cultural Monument programs are discussed below.

a) National Register

The National Register is an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.

i) Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:²⁰

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

¹⁹ Public Resources Code Section 5024.1 and 14 California Code of Regulations Section 4850.

²⁰ Title 36 Code of Federal Regulations Part 60.4.

i) *Physical Integrity*

According to *National Register Bulletin #15*, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.”²¹ Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance.”²² Within the concept of integrity, the National Register recognizes seven aspects or qualities that in various combinations define integrity. They are feeling, association, workmanship, location, design, setting, and materials, and they are defined by *National Register Bulletin #15* as follows:²³

- Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property’s expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.

ii) *Context*

To be eligible for listing in the National Register, a property must also be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”²⁴ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

iii) *Historic Districts*

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though

²¹ *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: U.S. Department of the Interior, 1997).*

²² *Ibid.*

²³ *Ibid.*

²⁴ *Ibid.*

it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”²⁵

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.²⁶ A district’s significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.²⁷

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.²⁸

b) California Register

In 1992, Governor Wilson signed AB 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.²⁹

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;

²⁵ *Ibid.*

²⁶ *Title 36 Code of Federal Regulations Part 60.3(d).*

²⁷ *National Register Bulletin #21: Defining Boundaries for National Register Properties Form (Washington D.C.: U.S. Department of the Interior, 1997).*

²⁸ *National Register Bulletin #16: How to Complete the National Register Registration Form (Washington D.C.: U.S. Department of the Interior, 1997).*

²⁹ *Public Resources Code Section 5024.1(a).*

- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion in the California Register.³⁰

For properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historical resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand their historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.³¹

The California Register may also include properties identified during historical resource surveys. However, the survey must meet all of the following criteria:³²

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

³⁰ *Public Resources Code Section 5024.1(d).*

³¹ *Public Resources Code Section 4852.*

³² *Public Resources Code Section 5024.1.*

i) SOHP Survey Methodology

The evaluation instructions and classification system proscribed by the SOHP in its *Instructions for Recording Historical Resources* provide a three-digit evaluation code for use in classifying potential historical resources. In 2003, the codes were revised to address the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation referred to in the first digit. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

c) City Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. The four criteria for Monument designation are stated below:

- The proposed Monument reflects the broad cultural, economic, or social history of the nation, state or community; or
- The proposed Monument is identified with historic personages or with important events in the main currents of national, state or local history; or
- The proposed Monument embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction;
- The proposed Monument is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.³³

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as Monuments.

³³ Los Angeles Administrative Code Section 22.171.7.

2) Historic Resources in Study Area

A historic preservation review has shown the Project Site is not within a historic preservation overlay zone;³⁴ nor is the Project Site identified as a City Historic-Cultural Monument (HCM).³⁵ Additionally, the Historic Places LA resource inventory indicates no historic resources on the site or adjacent to the site.³⁶

3) Eligibility Evaluation

While the existing buildings fronting Washington Boulevard is 50 years or older, it does not possess significance in American history, and the Project Site would not be eligible for the National Register, California Register.

4) Impact Analysis

i) Threshold Criteria

The *State CEQA Guidelines* set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states: “A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.”

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies “substantial adverse change” as follows: “Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”

Title 14 California Code of Regulations Section 15064.5(b)(1) in turn explains that a historical resource is “materially impaired” when a project: “Demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.”

The following factors are set forth in the *L.A. CEQA Thresholds Guide*, which states that a project would normally have a significant impact on a historical resource if it would result in a substantial adverse change in the significance of the historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;

³⁴ City of Los Angeles Department of City Planning Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: September 2020.

³⁵ City of Los Angeles Department of City Planning, LA Historic-Cultural Monuments, May 2015, website: http://planning.lacity.org/mapgallery/image/citywide/LA_HCM.pdf, accessed: September 2020.

³⁶ City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, website: <http://www.historicplacesla.org/map>, accessed: September 2020.

- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

As such, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not it will materially impair the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs such as the list of Los Angeles Historic-Cultural Monuments.

ii) Direct Project Impacts

The Project would have no direct impacts on historical resources. There are no historical resources on the Project Site and no historical resources would be demolished, altered, or relocated as a result of the Project. The Project Site is not identified as an HCM and does not possess significance in American history, the Project Site would not be eligible for the National Register, California Register. Therefore, the Project would have no direct impacts on historical resources.

iii) Indirect Project Impacts

The Project does not involve any physical changes to historical resources; therefore the Secretary of the Interior's Standards for the Treatment of Historic Properties do not apply.

5) Summary

The Project would have no direct impacts on historical resources. There are no historical resources on the Project Site and no historical resources would be demolished, altered, or relocated as a result of the Project. Indirect impacts on historical resources were also analyzed. The Project would no impact on historical resources in the Project vicinity. Therefore, as the Project would not cause a substantial adverse change in the significance of a historical resource, the exception is not applicable to the Project.

ii) Conclusion

None of the six exceptions to a Categorical Exemption are applicable to this Project. As the Project meets all five conditions enumerated for a Class 32 Categorical Exemption under CEQA and no exceptions are applicable, the Project therefore qualifies as a Categorical Exemption under CEQA. No further analysis is required.

Appendix A
Air Quality Data

CITY OF LOS ANGELES VMT CALCULATOR Version 1.2



Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: 10401 Washington Boulevard
 Scenario: With Project
 Address: 3855 S MOTOR AVE, 90232



If the project is replacing an existing number of residential units with a smaller number of residential units, is the proposed project located within one-half mile of a fixed-rail or fixed-guideway transit station?

Yes No

Existing Land Use

Land Use Type	Value	Unit
Retail Auto Repair	3.864	ksf
Housing Multi-Family	3	
Retail Auto Repair		
Retail Free-Standing Discount		

[Click here to add a single custom land use type \(will be included in the above list\)](#)

Proposed Project Land Use

Land Use Type	Value	Unit
Retail High-Turnover Sit-Down Restaurant	4.75	ksf
Housing Multi-Family		
Retail High-Turnover Sit-Down Restaurant		
Housing Affordable Housing - Family		

[Click here to add a single custom land use type \(will be included in the above list\)](#)

Project Screening Summary

Existing Land Use	Proposed Project
551 Daily Vehicle Trips	799 Daily Vehicle Trips
3,771 Daily VMT	5,006 Daily VMT
Tier 1 Screening Criteria	
Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. <input type="checkbox"/>	
Tier 2 Screening Criteria	
The net increase in daily trips < 250 trips	248 Net Daily Trips
The net increase in daily VMT ≤ 0	1,235 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	4.750 ksf
The proposed project is not required to perform VMT analysis.	



CITY OF LOS ANGELES VMT CALCULATOR Version 1.2



Project Information

Project: 10401 Washington Boulevard
 Scenario: With Project
 Address: 3855 S MOTOR AVE, 90232



Proposed Project Land Use Type	Value	Unit
Housing Multi-Family	130	
Retail High-Turnover Sit-Down Restaurant	4.75	
Housing Affordable Housing - Family	15	

TDM Strategies

Select each section to show individual strategies
 Use to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

	Proposed Project	With Mitigation
Max Home Based TDM Achieved?	No	No
Max Work Based TDM Achieved?	No	No

A Parking

Reduce Parking Supply: 446 city code parking provision for the project site
 Proposed Prj Mitigation 250 actual parking provision for the project site

Unbundle Parking: 150 monthly parking cost (dollar) for the project site
 Proposed Prj Mitigation

Parking Cash-Out: 100 percent of employees eligible
 Proposed Prj Mitigation

Price Workplace Parking: 6.00 daily parking charge (dollar)
 Proposed Prj Mitigation 25 percent of employees subject to priced parking

Residential Area Parking Permits: 200 cost (dollar) of annual permit
 Proposed Prj Mitigation

- B** Transit
- C** Education & Encouragement
- D** Commute Trip Reductions
- E** Shared Mobility
- F** Bicycle Infrastructure
- G** Neighborhood Enhancement

Analysis Results

Proposed Project	With Mitigation
695 Daily Vehicle Trips	628 Daily Vehicle Trips
4,354 Daily VMT	3,987 Daily VMT
N/A Household VMT per Capita	N/A Household VMT per Capita
N/A Work VMT per Employee	N/A Work VMT per Employee

Significant VMT Impact?	
Household: N/A Threshold = 7.4 15% Below APC	Household: N/A Threshold = 7.4 15% Below APC
Work: N/A Threshold = 11.1 15% Below APC	Work: N/A Threshold = 11.1 15% Below APC



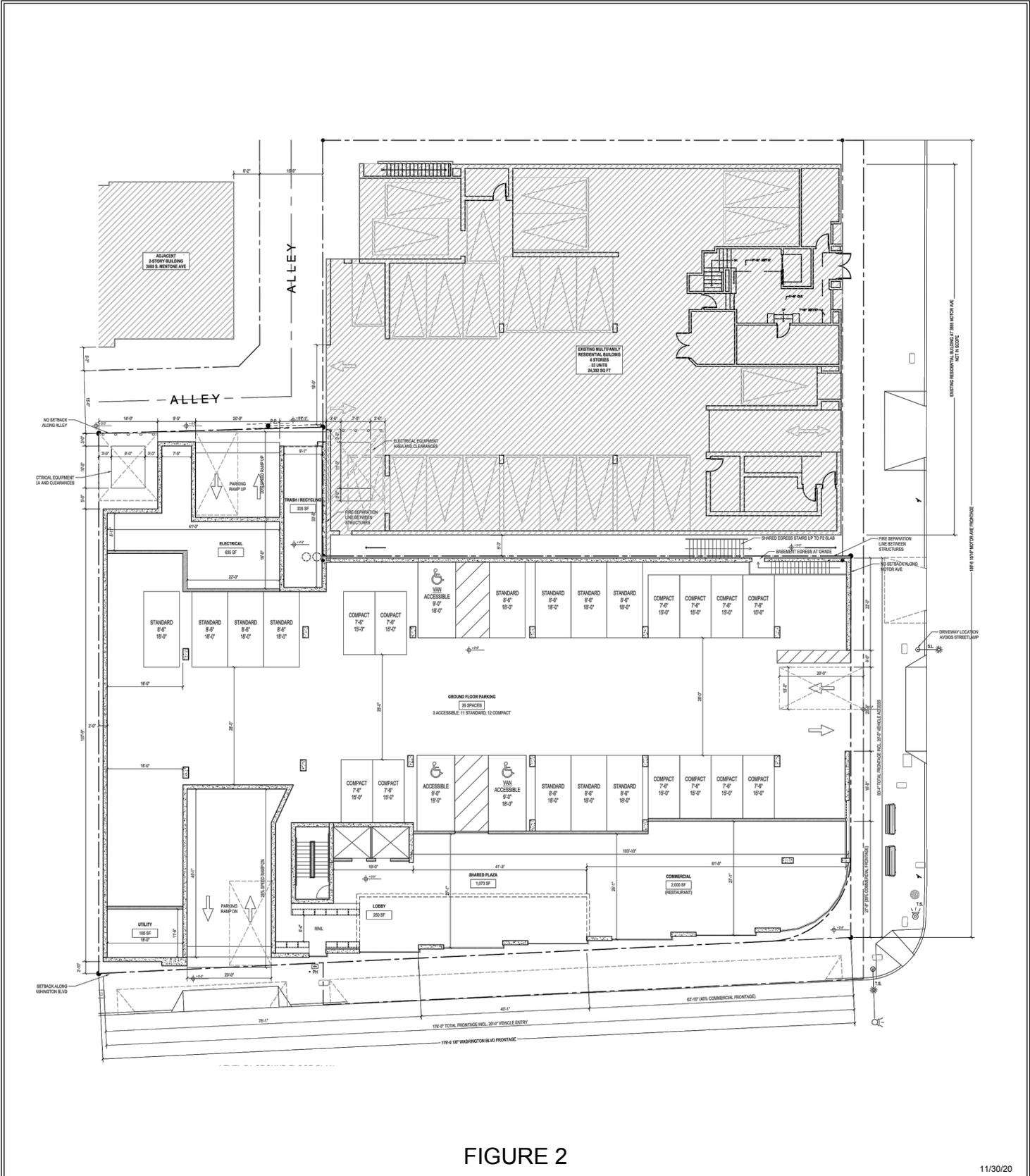


FIGURE 2

11/30/20

FN: WASHINGTON (10401) MIXED USE SITE PLAN

PROJECT CONCEPTUAL SITE PLAN



Transportation Planning
 Traffic Engineering
 &
 300 Corporate Pointe, Suite 470
 Culver City, California 90230
 PH (310) 473 6508 F (310) 444 9771
 www.crainandassociates.com