# **EXHIBIT G**

Environmental Clearance ENV-2021-815-ND

### **City of Los Angeles**



Department of City Planning • Community Planning Bureau City Hall • 200 N. Spring Street, Suite 667 • Los Angeles, CA 90012

### Westwood Village Specific Plan Amendment Project

Case Number: ENV-2021-815-ND

**Project Location:** The Project Area consists of the parcels included within the Westwood Village Specific Plan area. The Westwood Village Specific Plan area is comprised of approximately 50 acres located immediately south of the University of California, Los Angeles (UCLA), bounded by Le Conte Avenue to the north, Tiverton and Hilgard Avenues to the east, Lindbrook Avenue to the south, and Gayley Avenue to the west, as referenced in Figure 1 in this report.

Community Plan Area: Westwood

Council District: 5 - Koretz

**Project Description:** The proposed Project (or 'the project") is an ordinance to amend the Westwood Village Specific Plan (Ordinance Nos. 164305, 167137, 176177) and the Westwood Community Design Review Board Specific Plan (Ordinance No. 163204) to support a mix of uses in Westwood Village and reduce commercial vacancies. The Project consists of amendments to the Westwood Village Specific Plan, which include: (1) amendments and revisions to existing definitions, (2) elimination of ratios for restaurants and fast-food establishments, (3) reduced parking requirements, and (4) an Administrative Review process for reviewing signage and changes of use projects. The ordinance would also rescind Director's Interpretation (Case No. DIR-2002-5730-DI) and revise Section 3 of the Westwood Community Design Review Board Specific Plan to ensure consistency with Administrative Review procedures of the Westwood Village Specific Plan. No land use changes are proposed. The Project does not propose or approve any development or construction and would not authorize any new land uses. All new projects, including expansions, remodels, tenant improvements, changes of use, new construction or any other proposed project, are required to submit a permit, shall be subject to Specific Plan permit compliance review procedures and regulations.

#### PREPARED BY:

The City of Los Angeles Department of City Planning

### INITIAL STUDY

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### **INITIAL STUDY**

### **1 INTRODUCTION**

This Initial Study (IS) document evaluates potential environmental effects resulting from the implementation of the proposed **Ordinance Amending the Westwood Village Specific Plan and Westwood Community Design Review Board Specific Plan** ("Project"). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents and are ultimately required to be adopted by the decision maker prior to project approval by the City.

### 1.1 PURPOSE OF AN INITIAL STUDY

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

The Los Angeles City Council instructed the Department of City Planning to prepare an ordinance to amend the Westwood Village Specific Plan. The Department of City Planning, as the designated department to process the Project for the City, the lead agency, has determined that the Project is subject to CEQA, and the preparation of an Initial Study is required.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

### **1.2. ORGANIZATION OF THE INITIAL STUDY**

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

### 4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

### INITIAL STUDY

### 2 EXECUTIVE SUMMARY

| PROJECT TITLE            | WESTWOOD VILLAGE SPECIFIC PLAN AMENDMENT |
|--------------------------|--|
| ENVIRONMENTAL CASE NO.   | ENV-2021-815-ND                          |
| RELATED CASES            | CPC-2021-795-SP                          |
|                          |  |
| PROJECT LOCATION         | WESTWOOD VILLAGE                         |
| COMMUNITY PLAN AREA      | WESTWOOD                                 |
| GENERAL PLAN DESIGNATION | COMMUNITY COMMERCIAL                     |
| ZONING                   | C4-2D-O                                  |
| COUNCIL DISTRICT         | CD 5 - PAUL KORETZ                       |
|                          |  |
| LEAD AGENCY              | LOS ANGELES CITY PLANNING                |
| STAFF CONTACT            | JEFFREY KHAU                             |
| ADDRESS                  | 200 N. SPRING STREET, ROOM 667           |
| ADDRESS                  | LOS ANGELES, CA 90012                    |
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|                          |  |

### SUMMARY OF PROJECT

The Project is an ordinance to amend the Westwood Village Specific Plan (Ordinance Nos. 164305, 167137, 176177) and the Westwood Community Design Review Board Specific Plan (Ordinance No. 163204) to support a mix of uses in Westwood Village and reduce commercial vacancies in existing structures. The Westwood Village Specific Plan ("Specific Plan") addresses land use, development standards, cultural resources, urban design, and streetscape improvements. The emphasis of the Plan is on maintaining and enhancing the image and function of the area as a pedestrian-oriented, architecturally unique environment. The Project consists of amendments to the Westwood Village Specific Plan, which include: (1) amendments and revisions to existing definitions, (2) elimination of ratios for restaurants and fast-food establishments, (3) reduced parking requirements, and (4) an Administrative Review process for reviewing signage and changes of use projects. The ordinance would also rescind Director's Interpretation Case No. DIR-2002-5730-DI, and revise Section 3 of the Westwood Community Design Review Board Specific Plan to ensure consistency with Administrative Review procedures of the Westwood Village Specific Plan. No land use changes are proposed. The Project does not propose or approve any development or construction and would not authorize any new land uses.

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

### ENVIRONMENTAL SETTING

The Project area consists of the parcels included within the Westwood Village Specific Plan area. The Westwood Village Specific Plan area is comprised of approximately 50 acres located immediately south of the University of California, Los Angeles (UCLA), bounded by Le Conte Avenue to the north, Tiverton and Hilgard Avenues to the east, Lindbrook Avenue to the south, and Gayley Avenue to the west as referenced in Figure 1 in this report.

Properties to the north, across LeConte Avenue, are developed with buildings and improvements that encompass the UCLA campus and are zoned PF-1XL with a general plan designation of Public Facilities. Properties to the east, across Tiverton Avenue, are zoned [Q]R3-1-O and [Q]R5-1-O with a general plan designation of Medium Residential and developed with multi-family residential buildings. Properties to the south, across Lindbrook Drive, are zoned [Q]C4-2-O with a general plan designation of Regional Center Commercial and are developed with commercial and office buildings. Properties to the west, across the alleyway parallel to Gayley Avenue, are zoned PF-1XL with a general plan designation of Public Facilities and are developed with residential and institutional structures that serve UCLA.

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

### OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None.

### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

□ Aesthetics

- Greenhouse Gas Emissions
- □ Agriculture & Forestry Resources □ Hazards & Hazardous Materials
- Air Quality

□ Energy

Biological Resources

Cultural Resources

Geology / Soils

□ Land Use / Planning

□ Hydrology / Water Quality

- Mineral Resources
  - Noise
    - D Population / Housing

- Public Services
- Recreation
- □ Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- □ Wildfire
- Mandatory Findings of Significance

#### DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- □ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

| JEFFREY KHAU | CITY PLANNER |
|--------------|--------------|
| PRINTED NAME | TITLE        |
| HetCh        | 1/31/2022    |
| SIGNATURE    | DATE         |

### EVALUATION OF ENVIRONMENTAL IMPACT

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

### INITIAL STUDY

### **3 PROJECT DESCRIPTION**

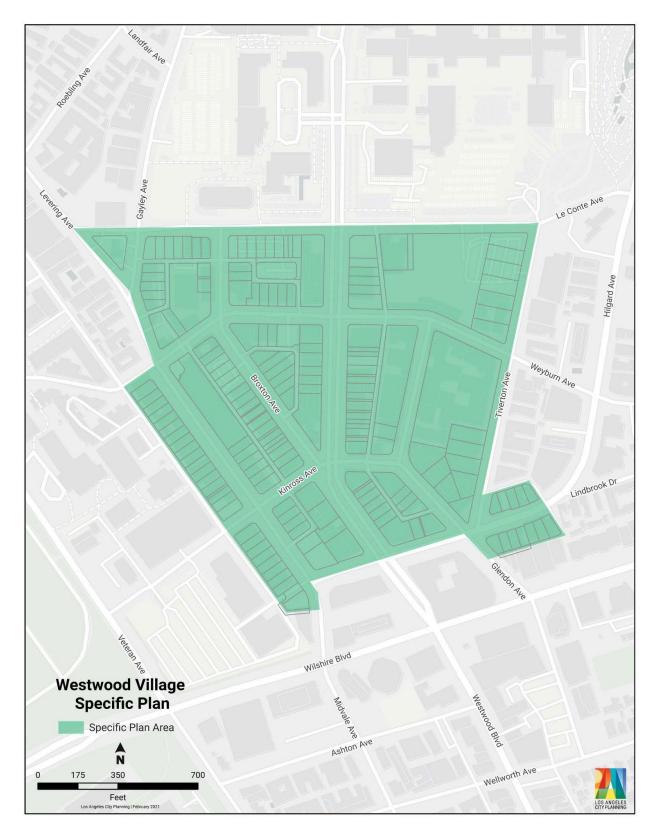
### 3.1 PROJECT SUMMARY

The Project is an ordinance amending the Westwood Village Specific Plan (Ordinance Nos. 164305, 167137, 176177) and the Westwood Community Design Review Board Specific Plan (Ordinance No. 163204) to support a mix of uses in Westwood Village and reduce commercial vacancies. The Westwood Village Specific Plan addresses land use, development standards. cultural resources, urban design. and streetscape improvements. The emphasis of the Plan is on maintaining and enhancing the image and function of the area as a pedestrian-oriented, architecturally unique environment. The Project consists of amendments to the Westwood Village Specific Plan, which include: (1) amendments and revisions to existing definitions, (2) elimination of ratios for restaurants and fast-food establishments, (3) reduced parking requirements and (4) an Administrative Review process for reviewing signage and changes of use projects. The ordinance would also rescind Director's Interpretation Case No. DIR-2002-5730-DI, and revise Section 3 of the Westwood Community Design Review Board Specific Plan to ensure consistency with Administrative Review procedures of the Westwood Village Specific Plan. No land use changes are proposed. The Project does not propose or approve any development or construction.

### 3.2 ENVIRONMENTAL SETTING

### 3.2.1 Project Location

The Project Area consists of the parcels included within the Westwood Village Specific Plan area. The Westwood Village Specific Plan area is comprised of approximately 50 acres located immediately south of the University of California, Los Angeles (UCLA), bounded by Le Conte Avenue to the north, Tiverton and Hilgard Avenues to the east, Lindbrook Avenue to the south, and Gayley Avenue to the west. Figure 1 shows the Project Area.



### Figure 1: Project Area Map

### 3.2.2 Existing Conditions

Westwood Village (the "Village") is a unique low-rise community center consisting almost entirely of storefronts and located between UCLA and Wilshire Boulevard. The Village is a historical, cultural, pedestrian-oriented area with retail shops, restaurants, and entertainment facilities. It is conveniently located to serve the Westwood Community and surrounding areas but has historically attracted people from the entire region. It was initially developed in the early 1930s as a "Mediterranean Village" of primarily two-andthree story buildings with frequent use of domes, towers, and courtyards. This Mediterranean design theme resulted in a unique combination of brick buildings with sloping tile roofs and more traditional stucco and tile Mediterranean architecture. Buildings were designed with attention to the relationship between the indoors and outdoors using courtyards and terraces, continuous building facades with no setback from the public right-of-way. The size, scale, and design of the buildings was intended to attract pedestrians.

The Westwood Village Specific Plan was adopted by the City Council in 1989 to respond to the transition of Westwood Village from a neighborhood-oriented retail center to a regional destination. The Specific Plan placed limitations on the number of food-related establishments, movie theater seats, and hotel guest rooms in the Plan area. It addressed the changing pattern of development in the Plan area, including a growing concentration of movie theaters and fast food uses that has led to an increase in congestion and safety concerns. The Specific Plan also sought to reinforce the pedestrian-scale of the built environment of the neighborhood.

An amendment to the Specific Plan, adopted by Council in 1991, added new definitions, limitations, and restrictions for various hotel uses and introduced prohibitions on drive-in business uses and new or used vehicle sale areas. This amendment clarified that additional hotel rooms could be constructed. The purpose of this amendment was to resolve disputes over the interpretation of definitions in the 1989 Specific Plan. On December 12, 2002, the City Planning Commission adopted a Director's Interpretation clarifying the definitions of "Restaurant" and "Fast Food Establishment" to provide a clear distinction between the two types of food-related establishments.

The latest amendment to the Specific Plan was adopted by Council in 2004 in support of a large mixed-use project along Glendon Ave. This amendment addressed land use, development standards, and project review provisions. This included new language exempting certain projects from "Mini-Shopping Centers" and "Commercial Corner Development" requirements set forth in the Los Angeles Municipal Code; definitions for "Mixed Use Project" and "Unified Development"; modified restrictions on alcohol sales and nightclubs and similar establishments; limits on residential densities; amendments to

the Certificate of Appropriateness clause for cultural resources; the creation of three new subareas with new use and height limits; changes to the parking requirements for "Retail and Other Commercial Uses"; adjustments to the bicycle parking and shower facilities requirements; and revisions to the Design Review procedures.

Westwood Village has seen an economic decline over the past 15 years. In 2006, vacancy rates in the Plan area were between 3 and 5%. By 2021, vacancy rates rose to nearly 40%. As cited in the Council motion (Council File 18-1101) submitted on May 4, 2021, "March 2021 CoStar data [shows] Westwood Village retail vacancy is over 31% and the availability rate... is 42%. In comparison, the Los Angeles retail vacancy rate is 21% and the availability rate is 27%." Vacancy and availability rates are typically used as economic indicators that provide a snapshot of market conditions. The amount of retail floor area in Westwood Village is estimated to be 329,073 square feet. CoStar data also indicates that vacancies have been rising in Westwood Village over the last five years at a rate that outpaces West Los Angeles and the City at large, as shown in Figure 2.





Moreover, staff performed a query on LoopNet (<u>www.loopnet.com</u>) - a commercial real estate data inventory tool available to the public that provides listings for sale and commercia leases. The sample query<sup>1</sup> found that 32 commercial leases and the 32 commercial lease spaces are mostly interspersed throughout the Project area, as seen in Figure 3.

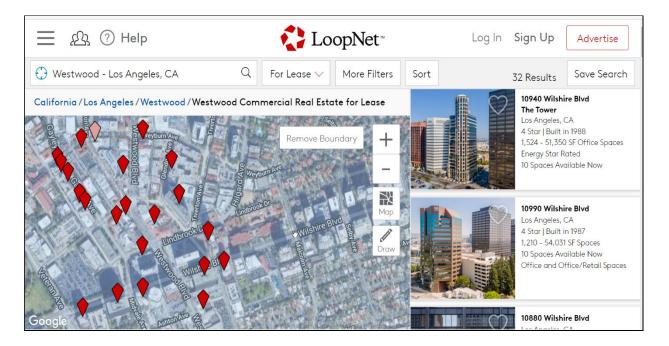


Figure 3: Sample query Listing 32 commercial leases in Westwood Village

In addition, the Council motion mentions a potential overabundance of parking in Westwood Village with "approximately 1,000 available spaces, at all times of the day, even during peak hours," as determined by a prior parking study<sup>2</sup>.

The <u>Cultural Resource Documentation Report Westwood Village</u><sup>3</sup> identified six buildings that qualify for individual listing in the National Register of Historic Places (Fox Westwood Village Theater, Fox Bruin Theater, University Professional Building, Masonic Clubhouse, Alice's Restaurant Building, and the Janss Investment Company Building). Table 1 in the Westwood Village Specific Plan identifies 46 buildings which qualify as locally significant historic resources based on City of Los Angeles Historic Preservation Overlay Zone

<sup>&</sup>lt;sup>1</sup> LoopNet, a subsidiary of CoStar Realty Information Inc. https://www.loopnet.com/search/commercial-realestate/westwood-los-angeles-ca/for-lease/?sk=d0abbfa567f38c27b595f60b31fa84ae&bb=39j-71vinNnkg4B, access on January 30, 2022 Note that please note that leases fluctuate and could change on a daily, weekly, or monthly bases.

<sup>&</sup>lt;sup>2</sup> Westwood Village Parking Study, https://thewestwoodvillage.com/wp-content/uploads/2019/08/Westwood-Parking-Assessment.pdf, accessed on January 18, 2022

<sup>&</sup>lt;sup>3</sup> Cultural Resource Documentation Report: Westwood Village.

https://drive.google.com/file/d/1R6iUV3CPwz0aQfV8q-Nw5O2\_duiKIhzL/view

(HPOZ) criteria.

A centralized public parking garage on Broxton Avenue with a Village-wide parking validation system provides accessible and affordable short-term parking and makes the Village more competitive with other shopping areas on the Westside.

### 3.2.3 Surrounding Land Uses

Properties to the north, across LeConte Avenue, are developed with buildings and improvements that encompass the UCLA campus and are zoned PF-1XL with a general plan designation of Public Facilities. Properties to the east, across Tyvertone Avenue, are zoned [Q]R3-1-O and [Q]R5-1-O with a general plan designation of Medium Residential and developed with multi-family residential buildings. Properties to the south, across Lindbrook Drive, are zoned [Q]C4-2-O with a general plan designation of Regional Center Commercial and are developed with commercial and office buildings. Properties to the west, across the alleyway parallel to Gayley Avenue, are zoned PF-1XL with a general plan designation of Public Facilities and are developed with residential and institutional structures that serve UCLA.

### 3.3 DESCRIPTION OF PROJECT

### 3.3.1 Project Overview

The Project consists of an ordinance to amend the Westwood Village Specific Plan to reduce commercial vacancies. The Westwood Community Design Review Board Specific Plan will also be amended to ensure procedural consistency between the two plans. In the proposed Westwood Village Specific Plan, a new section will be created entitled "Review Procedures" and will introduce a ministerial review process entitled "Administrative Review". The Project does not propose or approve of any development project, any construction or ground disturbing activities. The proposed regulations would only apply to "Projects", defined in the Specific Plan as:

"the construction, erection, addition to or structural alteration of any building or structure, a use of land or change of use on a lot located in whole or in part within the Specific Plan area. A project does not include interior remodeling of a building which does not increase the floor area"

The intent of this Specific Plan amendment is to promote economic opportunity within the Westwood Village area and facilitate case processing. The proposed ordinance will not change the range of neighborhood-serving land uses that are allowed by the Westwood Village Specific Plan. Future development will still be required to undergo an environmental review process to ensure that impacts to health and safety are analyzed before permits are issued. The Project has been analyzed for its reasonably foreseeable

indirect impacts.

### 3.4 REQUESTED PERMITS AND APPROVALS

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

• Pursuant to Section 11.5.7 G and 12.32 of the Los Angeles Municipal Code (LAMC), Recommend Approval of the ordinance to amend the Westwood Village Specific Plan and Westwood Community Design Review Board Specific Plan.

### INITIAL STUDY

### 4 ENVIRONMENTAL IMPACT ANALYSIS

### I. AESTHETICS

|  | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|-----------|
| Except as provided in Public Resources Code Section 21099, would the project:  |                                      |  |                                    |           |
| <ul> <li>a. Have a substantial adverse effect on a scenic vista?</li> </ul>  |                                      |  |                                    |           |
| b. Substantially damage scenic resources,<br>including, but not limited to, trees, rock<br>outcroppings, and historic buildings within a<br>state scenic highway?  |                                      |  |                                    |           |
| c. In non-urbanized areas, substantially degrade<br>the existing visual character or quality of<br>public views of the site and its surroundings?<br>(Public views are those that are experienced<br>from a publicly accessible vantage point). If<br>the project is in an urbanized area, would the<br>project conflict with applicable zoning and<br>other regulations governing scenic quality? |                                      |  |                                    |           |
| d. Create a new source of substantial light or<br>glare which would adversely affect day or<br>nighttime views in the area?  |                                      |  |                                    |           |

#### a) Have a substantial adverse effect on a scenic vista?

**No Impact.** A scenic vista is generally defined as a public view of highly valued visual and scenic resources exhibiting a unique or unusual feature, such as mountains, hillsides, bodies of water and/or urban skylines. A scenic vista may also be a particular distant view that provides visual relief from less attractive nearby features. Designated federal and state lands, as well as local open space or recreational areas, and may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape. Examples of local scenic views include public

views of the Pacific Ocean, the Santa Monica Mountains, and the downtown Los Angeles skyline. A significant impact would occur if a proposed project would have a substantial adverse effect on a scenic vista. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

Senate Bill (SB) 743, signed into law by Governor Brown in September 2013, eliminates the need to evaluate aesthetic and parking impacts of residential, mixed-use residential, or employment center projects on infill sites within a Transit Priority Area (TPA) by providing these types of projects shall not be considered to have a significant impact on the environment. The Project Area is located within the Westwood Village neighborhood in Los Angeles thus portions of this area may have scenic vistas of the Pacific Ocean, scenic vistas of the Santa Monica Mountains, Hollywood Hills or the downtown Los Angeles skyline. According to Southern California's Association of Government's (SCAG) Transit Priority Areas (TPA) 2045 Plan<sup>4</sup> the Westwood Village Specific Plan area is wholly within a TPA. Therefore, pursuant to SB 743, the Project will not have a significant aesthetic impact on the environment.

In addition, the Project does not propose or approve a development project. The Project does not change zoning or General Plan designations, nor does it change height limits. The Project does not create any zoning entitlements, nor introduce any new land uses that would result in an adverse effect on a scenic vista. The proposed ordinance will not change the range of neighborhood-serving land uses that are allowed by the Westwood Village Specific Plan. Future development will still be required to undergo an environmental review process to ensure that impacts to health and safety are analyzed before permits are issued. The Project does not include alterations to existing height limitations or property development standards, hence the Project does not create any physical changes to the environment that could impact scenic vistas. Therefore, there will no impact related to scenic vistas.

# b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

**No Impact.** A significant impact would occur if a proposed project would substantially damage scenic resources within a state scenic highway. The California Department of Transportation manages the State Scenic Highway Program. Additionally, the Project does not change zoning or General Plan designations, nor does it change zoning height limits. The project does not create any zoning entitlements, nor propose or approve any development, nor introduce new land uses that would result in an adverse effect on a state scenic highway. Finally, since the entire Project is within a TPA, the Project will not have a significant aesthetic impact on the environmental pursuant to SB 743. Therefore, no impacts related to scenic highways would occur. According to the California State Scenic Highway System Map<sup>5</sup>, no portion of the Project Area contains a segment of any officially designated State Scenic Highway.

<sup>&</sup>lt;sup>4</sup> SCAG TPA - 2045 Plan, https://gisdata-

scag.opendata.arcgis.com/maps/c9249b6bba0f49829b67ce104f81ef20/about, accessed on December 13, 2021. <sup>5</sup> California State Scenic Highway Map,

https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed on December 13, 2021.

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

**Less Than Significant Impact.** A significant impact would occur if a proposed project would substantially degrade the existing visual character or quality of the project site and its surroundings. Significant impacts to the visual character of a site and its surroundings are generally based on the removal of features with aesthetic value, the introduction of contrasting urban features into a local area, and the degree to which the elements of a proposed project detract from the visual character of an area.

The Project is located within Westwood Village which is an urbanized area that is comprised of developed land (approximately 50 acres) located immediately south of the University of California, Los Angeles (UCLA), bounded by Le Conte Avenue to the north, Tiverton and Hilgard Avenues to the east, Lindbrook Avenue to the south, and Gayley Avenue to the west as referenced in Figure 1 in this report. The following aerial picture of the area also helps to visualize the current urban pattern of development in the Project area – please see Figure 4 below:



Figure 4: Aerial photo of from Weyburn and Broxton looking into the Project area Photo map was downloaded from <u>www.loopnet.com</u> January 2022.

Properties to the north, across LeConte Avenue, are developed with buildings and improvements that encompass the UCLA campus and are zoned PF-1XL with a general plan designation of Public Facilities. Properties to the east, across Tiverton Avenue, are zoned [Q]R3-1-O and [Q]R5-1-O with a general plan designation of Medium Residential and developed with multifamily residential buildings. Properties to the south, across Lindbrook Drive, are zoned [Q]C4-2-O with a general plan designation of Regional Center Commercial and are developed with commercial and office buildings. Properties to the west, across the alleyway parallel to Gayley Avenue, are zoned PF-1XL with a general plan designation of Public Facilities and are developed with residential and institutional structures that serve UCLA.

Furthermore, Westwood Village (the "Village") is a unique low-rise community center consisting almost entirely of storefronts and located between UCLA and Wilshire Boulevard. The Village is a historical, cultural, pedestrian-oriented area developed with retail shops, restaurants, and entertainment facilities. It is conveniently located to serve the Westwood Community and surrounding areas but has historically attracted people from the entire region. As described in the environmental settings section, the size, scale, and design of the buildings was intended to attract pedestrians and has resulted in an urbanized village served by multiple forms of transit.

The Project does not change zoning or General Plan designations, nor does it change zoning height limits. The Project does not create any zoning entitlements, nor propose or approve any development or construction activities, nor introduce any new land uses that would result in an adverse effect related to visual character. Additionally, the Project will require signs and changes of use approved under the new Administrative Review to comply with an objective checklist of criteria aimed at eliminated any impacts. Any signs or uses that do not meet the criteria or deviate in any way will not be eligible for Administrative Review and must go through the environmental review process. Furthermore, as identified above, since the entire Project is within a TPA, the Project will not have a significant aesthetic impact on the environment pursuant to SB 743. Therefore, the Project, would not alter the visual character or quality of the urbanized Project Area and its urbanized surroundings, as such a less than significant impact would occur. No further analysis is required.

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

**No Impact.** A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely composed of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The proposed Project amends the Westwood Village Specific Plan to remove potential barriers, such as location ratios, to filling commercial vacancies and streamline the approval project for

eligible sign and change of use projects. The Project Area is mostly built out with a mix of uses and generally set within an urbanized environment with existing levels of ambient nighttime lighting, including streetlights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures that passes through windows) and automobile headlights. These uses are either currently producing some light (as in the case of existing commercial, residential, mixed-use and industrial buildings) or would generally be located in active areas and situated along streets with active commercial storefronts most likely not facing residential homes. The Project Area consists of streets improved with street lighting and developed with various commercial activity and uses.

The existing vacancy rate in the Project Area is about 39%, and it is reasonably foreseeable or anticipated that the Project could result in decreasing the existing vacancy rate down to a citywide vacancy rate which is at about 20%. As vacancies potentially decrease in the Project Area and permitted businesses start to occupy previously vacant commercial spaces, it is unlikely that these such new occupations will result in significant glare and lighting impacts.

Further, existing allowable uses would not be expected to emit large amounts of nighttime lighting or glare as all development projects are required to comply with provisions of the LAMC in this regard. The Project will require signs and changes of use approved under the new Administrative Review to comply with an objective checklist of criteria aimed at eliminated any impacts. Any signs or uses that do not meet the criteria or deviate in any way will not be eligible for Administrative Review and must go through the environmental review process. Additionally, the Project does not change zoning or General Plan designations, create any zoning entitlements, or approve any development. Finally, since the entire Project is within a TPA, the Project will not have a significant aesthetic impact on the environment pursuant to SB 743 as light and glare impacts are aesthetic in nature. Thus, the Project is not expected to create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. There would be no impacts and no further analysis is required.

### II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

**No Impact.** A significant impact would occur if a proposed project would convert valued farmland to non-agricultural uses. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland". The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Area has no Farmland<sup>6</sup>. The Project amends the Westwood Village Specific Plan to better support a mix of uses and reduce commercial vacancies in existing structures. The Project does not involve or include farmland or agricultural use. The Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new development that would convert any farmland to non-agricultural use. The proposed Project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur.

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

**No Impact.** A significant impact would occur if a proposed project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The Project Area does not contain any agricultural use or land regulated under a Williamson Contract. The Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new development that would conflict with or change existing zoning for agricultural use or a Williamson Act Contract. As such, the Project would not conflict with existing zoning for agricultural use or conflict with a Williamson Contract. Therefore, no impacts would occur.

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

**No Impact.** A significant impact would occur if a proposed project conflicted with existing zoning or caused rezoning of forest land or timberland or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The Project Area is not zoned for forest land or timberland. Accordingly, the proposed Project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

<sup>&</sup>lt;sup>6</sup> State of CA Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed on December 13, 2021

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

**No Impact.** See response to Section II(c) above. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." Timberland is defined as "land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."<sup>7</sup> The Project Area does not consist of any forest land or timberland. Therefore, there would be no impact and no further analysis is required.

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

**No Impact.** See response to Section 2(a) through (d) above. A significant impact would occur if a proposed project caused the conversion of farmland to non-agricultural use. The Project Area does not contain Farmland identified by the State of CA Department of Conservation, Division of Land Resource Protection as Unique Farmland<sup>8</sup>. Moreover, the Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new development that would involve other changes in the existing environment which could result in the conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. Therefore, no impacts would occur.

<sup>&</sup>lt;sup>7</sup> California Public Resources Code Section 4526

<sup>&</sup>lt;sup>8</sup> State of CA Department of Conservation, Division of Land Resource Protection. CA Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/

### III. AIR QUALITY

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

|   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|---|--------------------------------------|--|------------------------------------|-----------|
| Would the project:  |                                      |  |                                    |           |
| a. Conflict with or obstruct implementation of the applicable air quality plan?   |                                      |  |                                    |           |
| b. Result in a cumulatively considerable net<br>increase of any criteria pollutant for which the<br>project region is non-attainment under an<br>applicable federal or state ambient air quality<br>standard? |                                      |  |                                    |           |
| c. Expose sensitive receptors to substantial pollutant concentrations?  |                                      |  |                                    |           |
| <ul> <li>Result in other emissions (such as those<br/>leading to odors) adversely affecting a<br/>substantial number of people?</li> </ul>  |                                      |  |                                    |           |

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

**Less Than Significant Impact.** The City of Los Angeles is entirely within the South Coast Air Basin (SCAB) and is subject to the Air Quality Management Plan (AQMP) prepared by the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency primarily responsible for comprehensive air pollution control in the SCAB and reducing emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2016 AQMP to meet federal and state ambient air quality standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG). A significant air quality impact may occur if a project is inconsistent with the AQMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, nor introduce any new land uses, and is not anticipated to result in new development that would conflict with or obstruct implementation of an applicable air quality plan.

The Project removes potential barriers to full occupancy of existing commercial structures such as ratios for density in food establishments and providing an administrative process for eligible changes of use that could lead to a change in traffic patterns that would increase or change vehicle emissions from existing conditions. However, given the pedestrian-oriented nature of the Project Area, ample public transit in and around the area, capacity of the low-rise commercial establishments, and current overabundance of parking, any impact to air quality would be less than significant. As such, the Project is not expected to conflict with or obstruct the implementation of the AQMP and SCAQMD rules. In fact, the proposed reductions to parking space requirements and location in a TPA would likely help reduce air quality impacts from baseline conditions. Therefore, impacts would be less than significant, and no further analysis is required.

# b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

No Impact. A significant impact would occur if a proposed project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Project Area is located in an urbanized environment surrounded by existing public facilities, residential, industrial, and commercial buildings, traffic impacts that would have been included in the AQMP. The proposed Project does not propose or approve any development project, does not change zoning or General Plan designations, create any zoning entitlements, nor introduce any new land uses. The Project amends the Westwood Village Specific Plan to remove location restrictions and streamline projects involving signs and changes of use. While the proposed Project does not involve entitlements, the alteration to the regulations may result in a reduction in vacancies. While a reduction in vacancy may increase the volume of patrons, this area is located in an area with moderate to high density. It is anticipated that most of urban growth in this area would be considered infill or redevelopment. This area also has a well-connected street networks, and the mix and intensity of uses will result in a highly walkable environment. These areas offer enhanced access and connectivity for people and patrons who choose not to drive or have access to a vehicle, thus it is foreseeable that such increases would be insignificant. Additionally, reduced vacancies will not significantly alter the pattern of development as the existing building pattern is prescribed by the height, use, setback, parking and FAR regulations of the Specific Plan. The construction work necessary for tenant improvements associated with re-letting retail space would be limited to mostly interior improvements that do not require excavation or movement of earth. As such the Project is not anticipated to result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard. Therefore, the Project by itself would result in no impact and no further analysis is required.

### c) Expose sensitive receptors to substantial pollutant concentrations?

**Less Than Significant Impact.** A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare

centers, and athletic facilities<sup>9</sup>. As described above in section III (a) and (b), the Project does not propose or approve any development project or ground disturbing activity, nor does it change any existing land uses. The Project does not incentivize or disincentivize construction of new residential, commercial, mixed use or industrial development, therefore, it is not reasonably foreseeable that the Project will expose sensitive receptors to substantial pollutant concentrations. Thus, the Project would result in a less than significant impact and no further analysis is required.

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

**Less Than Significant Impact.** According to the SCAQMD, 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<sup>10</sup>. Odors from these types of uses would be localized and generally confined to the immediate area surrounding a project site. A proposed development would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Since no construction activity or development is proposed or approved as part of this Project, it would not likely cause an odor nuisance. Furthermore, the Project does not change zoning or General Plan designations, create any zoning entitlements, nor introduce any new land uses, and is not anticipated to result in new development that would result in other emissions, such as those leading to odors that could adversely affect a substantial number of people. It is anticipated that the Project would not likely result in activities that create objectionable odors. Therefore, the Project would result in no impact and no further analysis is required.

<sup>&</sup>lt;sup>9</sup> South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issue in General Plans and Local Planning. http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf accessed on December 14, 2021.

<sup>&</sup>lt;sup>10</sup> South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf accessed on December 14, 2021.

### IV. BIOLOGICAL RESOURCES

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

|                                       | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|---------------------------------------|--------------------------------------|--|------------------------------------|-----------|
| her<br>on<br>ite,<br>or<br>by<br>life |                                      |  |                                    |           |
| any<br>Iral<br>ns,<br>nia<br>ish      |                                      |  |                                    |           |
| or<br>not<br>tc.)<br>cal              |                                      |  |                                    |           |
| of<br>life<br>: or<br>use             |                                      |  |                                    |           |
| ces<br>ree                            |                                      |  |                                    |           |
| ted<br>Iral<br>her<br>itat            |                                      |  |                                    |           |

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

**No Impact.** A project would have a significant biological impact if it resulted in the loss or destruction of individuals of a species or the degradation of sensitive habitat. Habitats are natural and/or artificial environments that support the survival of wild animals and native plants. Five habitat types have been identified by the City. These habitat types include Inland Habitats, Significant Ecological Areas (SEA), Wildlife Corridors, Ocean, and Coastal Wetlands. The Project Area is located in an urbanized setting located in the Westwood Village neighborhood of Los Angeles and is not located in or adjacent to any Significant Ecological Areas<sup>11</sup>.

The proposed Project does not propose to change any existing land uses or approve any new development. As such, the proposed Project would not directly or indirectly affect any special status species and would not modify any special status species habitat. The proposed Project would have no substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CA Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the proposed Project would result in no impacts to candidate, sensitive, or special status species. No further analysis is required.

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

**No Impact.** A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of development. The Project Area is largely built out and located in an urbanized area and does not contain any sensitive biological resources. Therefore, the Project would have no adverse effects on riparian habitat or other sensitive natural communities in these areas. Moreover, the Project by itself does not propose or approve any development and would not change existing land uses. Any development that separately occurs pursuant to the Specific Plan would require its own individual environmental review. Thus, the Project would not result in direct impacts to biological resources, including riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service, within the Project Area or in the surrounding area, and no impacts would occur. No further analysis is required.

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

**No Impact.** There are two categories of wetlands, coastal/tidal wetlands and inland/non tidal wetlands. Inland/non-tidal wetlands are most common on floodplains along rivers and streams (riparian wetlands), in isolated depressions surrounded by dry land (for example playas, basins

<sup>&</sup>lt;sup>11</sup> LA County Sensitive Ecological Areas Program, http://planning.lacounty.gov/site/sea/maps, accessed December 14, 2021

and "potholes"), along the margins of lakes and ponds, and in other low-lying areas where the groundwater intercepts the soil surface or where precipitation sufficiently saturates the soil (vernal pools and bogs)<sup>12</sup>. A significant impact would occur if federally protected wetlands would be modified or removed by a project.

The Project Area does not contain any wetlands, coastal/tidal wetlands or inland/non-tidal wetlands as defined by Section 404 of the Clean Water Act<sup>13</sup>. Additionally, the proposed Project does not approve or propose any development project, nor does it modify any City regulations that would adversely affect federally protected wetlands. Therefore, the proposed Project will not have any effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and no impact will occur. No further analysis is required.

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

**No Impact.** Wildlife corridors are land segments that connect two or more large habitat areas and provide a habitat for movement of animals between those areas. A significant impact would occur if a proposed project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. According to the Los Angeles County Regional Planning Department there are no wildlife corridors or regional wildlife linkages in the Project Area<sup>14</sup>. Additionally, there are no bodies of water in which fish are present in the Project Area. Further, the Project does not propose or approve a development project or any construction activity. As the Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new significant development that would interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of nature wildlife nursery sites, there would be no impact.

### e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

**No Impact.** A significant impact would occur if a proposed project would be inconsistent with local regulations pertaining to biological resources. The Project would not conflict with any policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance. The City's Protected Tree Ordinance No. 177,404 (Chapter IV Article 6 of the Los Angeles Municipal Code), defines protected trees as: Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree:

<sup>&</sup>lt;sup>12</sup> United States Environmental Protection Agency, Wetlands - https://www.epa.gov/wetlands/what-wetland, accessed on December 14, 2021

<sup>&</sup>lt;sup>13</sup> U.S. Fish & Wildlife Service, National Wetlands Inventory, https://www.fws.gov/wetlands/data/Mapper.html, accessed on December 14, 2021

<sup>&</sup>lt;sup>14</sup> Los Angeles County Regional Planning. Regional Habitat Linkages and Wildlife Corridors. http://planning.lacounty.gov/assets/upl/project/gp\_2035\_2014-FIG\_9-2\_Regional\_Wildlife\_Linkages.pdf, accessed on December 14, 2021

- Oak trees including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa);
- Southern California Black Walnut (Juglans californica var. californica);
- Western Sycamore (Platanus racemosa); and
- California Bay (Umbellularia californica):

The Project Area likely contains locally protected biological resources, such as oak trees, Southern California black walnut, western sycamore, and California bay trees. However, the Project does not propose or approve any development project and development is not anticipated to occur either directly or indirectly as a result of the Project. Additionally, any future development project would be required to comply with all policies and ordinances protecting biological resources including the Protected Tree Ordinance. Therefore, the Project does not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

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

**No Impact.** The Project Area does not fall within any identified Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, the Project would not conflict with the provisions of any adopted conservation plan, and no impacts would occur. No further analysis is required.

### V. CULTURAL RESOURCES

|   |   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|---|---|--------------------------------------|--|------------------------------------|-----------|
| Would the project:  |   |                                      |  |                                    |           |
| a. Cause a substantial adverse chang<br>significance of a historical resource<br>to § 15064.5?      |   |                                      |  |                                    |           |
| b. Cause a substantial adverse chang<br>significance of an archaeological<br>pursuant to § 15064.5? |   |                                      |  |                                    |           |
| c. Disturb any human remains, includi interred outside of dedicated cemeter                         | 0 |                                      |  | $\boxtimes$                        |           |

### a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

**Less Than Significant Impact**. Section 15064.5 of the State CEQA Guidelines state that a "historical resource" is defined 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 that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, 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; in addition, (4) the fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register or historical resources, or identified in an historical resources survey does not preclude a lead agency from determining that the resource may be an historical resource.

Under the City's Cultural Heritage Ordinance, local buildings and sites that meet the criteria for designation can be declared HCMs by the City Council after recommendation from the Cultural Heritage Commission. As of today, there are six declared City HCMs within the Project Area (see Table 1). On December 17, 2020, the Cultural Heritage Commission voted to add the Holmby Building to the list of HCMs. As such, part of this Specific Plan amendment will include modifications to Figure 2 and Table 1 of the Specific Plan to reflect this addition. The inclusion of the Holmby Building as an HCM would not lead to an adverse change in the significance of the building as a historic resource.

| Historic Cultural Monument                               | Date Adopted/Approved | Site Address  |
|--|-----------------------|---|
| Bratskeller - Egyptian Theater<br>(Ralphs Grocery Store) | June 21, 1988         | 1142-1154 Westwood Boulevard and<br>10887 Lindbrook Drive                               |
| Fox Bruin Theater  | June 21, 1988         | 926-950 Broxton Avenue and 10935-<br>10943 Weyburn Avenue                               |
| Fox Village Theater                                      | June 21, 1988         | 945-961 Broxton Avenue and 10953-<br>10961 Weyburn Avenue                               |
| Janss Investment Company<br>Building                     | June 21, 1988         | 1045-1099 Westwood Boulevard  |
| Kelly Music Building                                     | December 10, 2019     | 1043 Westwood Boulevard   |
| Holmby Building  | December 17, 2020     | 901-951 Westwood Boulevard<br>10904-10914 Le Conte Avenue<br>10903-10907 Weyburn Avenue |

 Table 1. Historic Cultural Monuments, Westwood Village Specific Plan Area

A significant impact would occur if a proposed project would substantially alter the environmental context of or remove identified historical resources. The Project, by itself, does not propose or approve any development and it is unlikely that the Project would result in the demolition or removal of any structure that may be historically significant. It is foreseeable that adaptive reuse projects, and remodels that would possibly need typical tenant improvements to comply with LADBS code and safety requirements. Future development activity within the Project Area that includes the issuance of a building, grading, or demolition, sign, or change of use permit on sites with identified historic resources or on any sites with a resource not previously identified but with substantial evidence submitted to the City's Office of Historic Resources that the subject is a historical resource under the CEQA Guidelines would need to comply with any applicable ordinances and provisions of the LAMC and any applicable mitigation measures. Any change of use or increase in certain uses due to the removal of ratios would also be subject to these ordinances, provisions, and any applicable mitigation measures.

The Project amends the Westwood Village Specific Plan to introduce a new ministerial approval process for certain projects involving signs and changes of use. Under this process, Projects on sites with identified historic resources require a Certificate of Appropriateness and therefore not be eligible for change of use and sign permits issued under the Administrative Review. In addition, future projects would be subject to all federal, state, and local regulations regarding the protection and preservation of historic resources. Therefore, the Project would result in a less than significant impact causing a substantial adverse change in the significance of a historical resource. No further analysis is required.

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

Less Than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of a proposed

development. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources.

The Project consists of an ordinance to amend the Westwood Village Specific Plan to better support a mix of uses and reduce commercial vacancies in existing structures. The proposed Project does not propose or approve any development project or ground disturbing activity. The Project will not increase new building construction that would require excavation or grading as the purpose of the amendment is primarily to reduce vacancies in existing commercial buildings. As such, there is less than significant potential for archeological resources to be affected by the proposed Project. Therefore, impacts to archeological resources would be less than significant. No further analysis is required.

#### c) Disturb any human remains, including those interred outside of formal cemeteries?

**Less Than Significant Impact**. A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. Human remains could be encountered during excavation and grading activities associated with a proposed project. However, the Project does not propose or approve any development project. As such, no construction activities or ground disturbing activities are anticipated. Since the Project does not involve any development, no human remains would be disturbed as a result of the adoption of the Project. Therefore, a less than significant impact would occur, and no further analysis is required.

#### VI. ENERGY

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

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

**No Impact.** The Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, nor introduce any new land uses, and is not anticipated to result in new development that would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. It is unlikely that the Project would result in new development. New development, changes of use, adaptive re-use projects, typical tenant improvements, including building interior remodels would remain subject to the Los Angeles Green Building Code (LAGBC - Ord. No. 181,479 and Ord. No. 181,480), which is based on the California Green Building Standards Code. The LAGBC serves as the mechanism to regulate and reduce a building's energy use, water use and overall carbon footprint.

The Project removes potential barriers to full occupancy of existing commercial buildings such as location restrictions for food establishments and provides a ministerial approval process for eligible changes of use that could lead to an increase in the consumption of energy resources. However, given the capacity of the low-rise commercial establishments, any increase is expected to be less than significant. Furthermore, any new occupants and uses will be required to comply with all applicable energy efficiency standards designed to conserve energy. Therefore, the Project would result in no impact to energy resources. No further analysis is needed.

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

Less Than Significant Impact. A significant impact would occur if a proposed project were to conflict or obstruct a state or local plan for renewable energy or energy efficiency. The Project removes potential barriers to full occupancy of existing commercial structures such as location restrictions for food establishments and provides a ministerial approval process for eligible changes of use that could lead to an increase in the consumption of energy resources. However, given the capacity of the low-rise commercial establishments, any increase is expected to be less than significant. Furthermore, any new occupants and uses will be required to comply with all applicable energy efficiency standards designed to conserve energy. Additionally, the Project does not propose or approve any new development.

As mentioned in VI (a), any future development would be subject to the City's Green Building Code which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional, and global ecosystems. In addition, the California Energy Commission is the state's primary energy policy and energy planning agency responsible for assessing California's energy systems and trends as well as generating information resulting in renewable energy and energy efficiency promoting policies. There are several adopted State bills that promote renewable energy and energy efficiency for which future development projects will be required to comply including but not limited to: Senate Bill (SB) 350 Clean Energy and Pollution Reduction Act (2015), and Assembly Bill 2514 Energy Storage System Procurement Targets from Publicly Owned Utilities (2010). Some of these new policies inform and or expand the framework for local plans, programs and regulations regarding renewable energy and increased energy efficiency including, but not limited to the City of Los Angeles' Green New Deal Plan, the Los Angeles Green Building Code; and the City's Existing Buildings Energy and Water Efficiency (EBEWE) Program. Therefore, the Project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, a less than significant impact would occur.

#### **VII. GEOLOGY AND SOILS**

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

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

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

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
- ii) Strong seismic ground shaking?
- iii) Seismic-related ground failure, including liquefaction?
- iv) Landslides?

**i. No Impact**. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zone, which are regulatory zones around active faults. These zones, which extend from 200 to 500 feet on each side of known active faults, could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. A significant impact may occur if a project would cause personal injury or death or result in property damage as a result of a fault rupture occurring in the project area and is also located in a State-designated Alquist-Priolo fault zone or where appropriate building practices are not employed. The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy.

According to the California Department of Conservation Special Studies Zone Map, no portion of the Project Area is located in a Earthquake fault zone<sup>15</sup>. The proposed Project does not propose construction nor approve a development project. Therefore, grading, excavation, and fault endangering activities associated with new development are not anticipated. The proposed Project includes amendments to address vacancy rates in existing structures. It is anticipated that the Project can likely result in redevelopment and infill construction activity such as remodeling or tenant improvements of existing structures that do not likely include grading activities that would cause significant vibrations to fault lines. The proposed Project would not expose people or structures to potential adverse effects resulting from the rupture of known earthquake faults. Thus, there would be no impact related to personal injury or death or resulting in property damage due to a fault rupture would occur. No other analysis is required.

**ii. Less Than Significant Impact.** A significant impact would occur if a proposed project would cause personal injury or death or result in property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Consequently, any development could expose people and structures to

<sup>&</sup>lt;sup>15</sup> California Department of Conservation, EQ Zapp: California Earthquake Hazards Zone Application, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed on December 16, 2021

strong seismic ground shaking. The Project Area is located within seismically active Southern California and therefore, could be subject to moderate and possibly strong ground motion due to earthquakes on the Santa Monica Fault Line. However, the Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses that would result in strong seismic ground shaking or exacerbate existing environmental conditions to potentially cause or exacerbate strong seismic ground shaking.

In addition, all future development in the Project Area is required to comply with all relevant California Building Code (CBC) and the City of Los Angeles Uniform Building Code (UBC) seismic standards, and if necessary, the preparation of a site-specific geotechnical investigation that would evaluate the potential for seismic risk and identify appropriate mitigation measures. Implementation of the proposed Project does not trigger new development or construction and is not expected to induce development or otherwise alter existing development patterns. Grading, excavation, and activities associated with increasing strong seismic ground shaking are not anticipated. The proposed Project includes amendments to address vacancy rates in existing structures. It is anticipated that the Project will likely result in some redevelopment or infill construction activity such as remodeling or tenant improvements of existing structures that do not likely to include grading activities that would cause significant vibrations to fault lines. Therefore, the proposed Project would result in less than significant impacts. No further analysis is required.

**iii. Less Than Significant Impact.** A significant impact may occur if a proposed project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking.

The California Department of Conservation's Seismic Hazard Zones Map identifies a portion of the Project area in a liquefaction zone<sup>16</sup>. The Project does not propose or approve any development project or ground disturbing activity. Any current or future construction activities incentivized by the Project would continue to be required to comply with current seismic design provisions of the California Building Code and City's Building Code, which incorporates relevant provisions related to protection against liquefaction. Compliance with regulatory measures would reduce potential impacts. The proposed Project includes amendments to address vacancy rates in existing structures. Additionally, it is anticipated that the Project will most likely result in some redevelopment or infill construction activity such as remodeling or tenant improvements of existing structures that does not include grading activities which would cause vibrations to fault lines As such, the proposed Project would result in a less than significant impact related to seismic-related ground failure, including liquefaction and so no further analysis is required.

<sup>&</sup>lt;sup>16</sup> California Department of Conservation, EQ Zapp: California Earthquake Hazards Zone Application, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed on December 16, 2021

**iv. No Impact.** Landslides are movements of large masses of rock, and/or soil. Landslide potential is generally the greatest for areas with steep and /or high slopes, low shear strength, and increased water pressure. A significant impact would occur if a proposed project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated that would suggest potential for sliding.

The Project does not propose or approve any development project or any ground disturbing activity that would result in a landslide. According to the California Department of Conservation, the Project Area contains no landslide zones<sup>17.</sup> Therefore, the Project will have no impact as it relates to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No further analysis is required.

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

**No Impact.** A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. Erosion is the movement of rock and soil from place to place and is a natural process. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities or where erosion control measures are not used.

The Project does not propose or approve any development project. Any anticipated increase in commercial occupants and decrease of vacancies in existing structures resulting from the removal of location restrictions is not expected to have any impact on soil in the area because it is likely that the vacancies would be filled by changes of use that would include some level of remodeling, or tenant improvements of existing buildings to comply with LADBS standards an safety codes. In addition, future changes of use or new applications for permitted uses would be consistent with LADBS regulations required of commercial development that would typically be resistant to soil erosion and topsoil loss. Construction of future development projects that would result in ground surface disturbance during site clearance, excavation, and grading and could create the potential for soil erosion would be subject to LADBS regulations in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. In addition, future projects would be required to develop a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would require implementation of an erosion control plan to reduce the potential for wind or waterborne erosion during the construction process. All future onsite grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, and conditions imposed by the City of Los Angeles Department of Building and Safety Soils Report Approval Letter. Furthermore, development or likely redevelopment, remodeling or tenant improvements of existing buildings for commercial uses or changes of use that would result from the Project would be subject to all applicable Best Management Practices (BMPs) relating to erosion and stormwater runoff and included in the City's Low impact Development (LID) Ordinance (Ordinance No. 181,899). Therefore, no impact would occur with respect to erosion or loss of topsoil.

<sup>&</sup>lt;sup>17</sup> California Department of Conservation, EQ Zapp: California Earthquake Hazards Zone Application https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed on December 16, 2021

Therefore, no impact would occur with respect to erosion or loss of topsoil.

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

**No Impact.** A significant impact would occur if a proposed project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. According to the California Department of Conservation, Division of Mines and Geology, the Seismic Hazard Zones Map, the Project Area is not located within landslide hazard zones and is not susceptible to liquefaction. The proposed Project does not propose or approve development or any ground disturbing activity and does not authorize new land uses. Westwood Village is located with an urban environment and is built out with existing structures including a mix of office and commercial uses. The majority of lots that are built out contain improvements or buildings that are likely to not result in any major construction as a result of this Project. Approximately four surface parking lots in the Westwood Village Area can accommodate new construction, these four surface parking lots are used to accommodate parking needs in this area and are located between or adjacent to properties with built out structures. There is no evidence that these lots are located on a geologic unit or unstable soil. Should the Project result in an increase or change development patterns, those projects are likely to be infill projects within an environment that is built out with surrounding existing structures. It is mostly likely anticipated that the Project would accommodate changes of use or typical tenant improvements within existing structures that would not likely include construction that would incur ground disturbance. Since the Project does not approve any construction or ground disturbing activity, the Project is not likely to expose people or structures to soil that is unstable or that would become unstable and the potential effects resulting from landslides, lateral spreading, subsidence, liquefaction, or collapse and no impacts would occur.

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

**No Impact.** A significant impact would occur if a proposed project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils have relatively high clay minerals and expand with the addition of water and shrink when dried, which can cause damage to overlying structures.

The Project site contains Ramona Loam Class 013 and Yolo Loam class 016 Soil, per the Los Angeles County Soil Types Map (hyperlink address included for reference https://data.lacounty.gov/Shape-Files/LA-County-Soil-Types/sz94-meiu). These soil types are a member of the fine-loamy, mixed, thermic family of Typic Hapoloxeralfs. According to the National Cooperative Soil Survey, performed by the United Stated Department of Agriculture, Loam and sand drain fairly well, which makes them non-expansive unless circumstances are extreme. Therefore, there is no evidence that the site contains expansive soil. It is mostly likely anticipated that the future development activity resulting from the Project would be typical tenant improvements and remodeling activity in existing structures that would not likely include construction that would incur ground disturbance.

In the case that expansion soil evidence was found in the Project, either as a result of extreme circumstance or geological change, any future development and application for construction or LADBS permit activity in the Project Area would be required to comply with the requirements of the Uniform Building Code (UBC), LAMC, and other applicable building codes. LADBS regulates this aspect of permitting and construction for projects that require underground construction or activity. It is anticipated that the Project could result in development activity such as remodels, or typical tenant improvements for changes of use or fill vacancies in existing structures. In the event that development or construction, or other extreme circumstances, permits for such activity would be regulated and reviewed by LADBS. Compliance with such requirements would reduce foreseeable impacts to a less than significant level. However, since the proposed Project does not propose or approve any development project or any ground disturbing activity, the proposed Project would likely result in no impact to creating direct or indirect risks to life or property. No further analysis is required.

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

**No Impact**. A project would cause a significant impact if adequate wastewater disposal were not available. The Project Area is fully located in a developed area which includes existing public infrastructure for wastewater disposal systems. The use of septic tanks or alternative wastewater disposal systems would not be required. The proposed Project does not propose or approve development and does not adopt new allowable land uses. Therefore, the proposed Project would result in no impacts to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. No further analysis is required.

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

**No Impact.** Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations. A significant impact may occur if a project destroys a unique paleontological resource site or unique geologic feature. The Project does not involve any development project, construction or ground disturbing activity that would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. There, the proposed Project would result in no impact and no further analysis is required.

#### VIII. GREENHOUSE GAS EMISSIONS

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

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

**Less Than Significant Impact.** Greenhouse gases (GHG) are gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. GHG has been recognized to contribute to global climate change. Predicted effects of global climate change include sea level rise, water supply changes, changes to ecosystems and habitat, and human health effects.

The Project removes potential barriers to full occupancy of existing commercial buildings, such as location ratios, and provides an administrative review process for eligible changes of use that could lead to a change in traffic patterns that would increase or change vehicle emissions from existing conditions. However, given the pedestrian-oriented nature of the Project Area, ample public transit in and around the area, capacity of the low-rise commercial establishments, and current overabundance of parking, the Project is unlikely to generate GHGs, either directly or indirectly, that would have a significant impact on the environment. In fact, the proposed reductions to parking requirements and the Project's location in a TPA should help reduce GHG impacts from baseline conditions. In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code (LAGBC) (Ordinance No. 181,480). The LAGBC requires projects to achieve a 20 percent reduction in potable water use

and wastewater generation. The City has also adopted the LA Green New Deal Plan to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. Through required implementation of the LAGBC and the LA Green New Deal Plan, the proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs. Therefore, the proposed Project's generation of GHG emissions would result in a less than significant impact on the environment.

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

Less Than Significant Impact. The California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the Southern California Association of Government (SCAG) region, the SCS is contained in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020-2045 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and commercial corridors, resulting in more opportunity for transit-oriented development. In addition, SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions that reduce Vehicle Miles Traveled (VMT), which contribute to GHG emissions, as required by AB 32. The Project removes potential barriers to full occupancy of existing commercial buildings, such as location ratios, and provides an administrative review process for eligible changes of use that could lead to a change in traffic patterns that would increase or change vehicle emissions from existing conditions. However, given the pedestrian-oriented nature of the Project Area, ample public transit in and around the area, capacity of the low-rise commercial establishments, and current overabundance of parking, the Project strives to support the goals and policies aimed at reducing GHGs. Any impacts to GHGs would be less than significant. In fact, the proposed reductions to parking requirements and the Project's location in a TPA should help reduce GHG impacts from baseline conditions. The proposed Project is a Specific Plan amendment that seeks to address vacancies in existing buildings, and does not include the approval of a new development project. The Project would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020-2045 RTP/SCS. The Project, therefore, would not conflict with statewide, regional and local goals and policies aimed at reducing GHG emissions and would result in a less than significant impact related to plans that target the reduction of GHG emissions.

#### IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

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

**No Impact.** A significant impact would occur if a proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Project would not specifically result in the transport, use, and disposal of construction related hazardous materials, as no specific development is proposed or approved. The Project does not consist of any development, or any construction related activity. The Project does not propose or approve any activities that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. It is anticipated that the Project is likely to result in changes of use or remodels that might require typical tenant improvements to meet building code standards and other LADBS safety requirements. Future development and building permit activity in the Project Area would be required to comply with all applicable local, state and federal regulations governing the routine transport, use or disposal of hazardous materials. With compliance to applicable standards and regulations and adherence to manufacturer's instructions related to hazardous materials, the proposed Project would not create a significant hazard and would result in no impact.

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

**No Impact.** A significant impact would occur if a proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. The Project does not approve or propose any new development and is not expected to significantly alter existing development or development patterns. It is anticipated that the Project is likely to result in changes of use or remodels that might require typical tenant improvements to meet building code standards and other LADBS safety requirements. No excavation or construction-related activities are anticipated to occur which could result in the release of hazardous materials into the environment. Therefore, the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment through reasonably foreseeable upset and accident conditions. No further analysis is required.

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

**Less than Significant.** Construction activities have the potential to result in the release, emission, handling, and disposal of hazardous materials within one-quarter mile of an existing school. The University of California, Los Angeles (UCLA), college campus is immediately abutting north of the Project area but is not within the Project area, however there are several

educational serving uses located in or within one-quarter mile of the Westwood Village area. UCLA Extension is located at 1145 Gayle Avenue, and the UCLA Extension American Language School is located at 10920 Lindbrook Avenue. In addition, Angels Academy of Music is located at 10921 Weyburn Avenue. The Project does not approve or propose any new development, however as a result of the Project it is likely that construction activity such as remodels, infill-construction, and typical tenant improvements to accommodate changes of use or fill commercial vacancies within existing buildings are anticipated to occur. This type of development activity is not likely to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances within one-quarter mile of an existing or proposed school.

As discussed in Section IX (a) above, any future development project may include the use of those hazardous materials that are typically necessary for construction of new developments (e.g., paints, building materials, cleaners, fuel for construction equipment, etc.) where construction activities would involve routine transport, use and disposal of construction-related hazardous materials. Conformance with all applicable local, state and federal regulations governing such activities would result in a less than significant impact related to hazardous emissions, acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. However, the proposed Project is likely to result in construction activity would be in conformance with LADBS rules that regulate the transport and handling of hazardous or acutely hazardous materials and substances. As such, the proposed Project would result in less than significant impacts within one-quarter mile of an existing or proposed school school materials and substances. No further analysis is required.

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

**No Impact.** A significant impact would occur if the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC's oversight.

A review of the EnviroStor website showed that there are no Cleanup Sites located in the Project Area<sup>18</sup>. Additionally, the Project would not produce any impact causing a significant hazards risk to the public. The Project does not propose or approve development or ground disturbing activity and would not authorize or expand any new or allowable land uses. The proposed Project does not contain any Clean Up sites and would not create a significant hazard to the public or the environment since no development or ground disturbing activity is associated with the Project thus no impact would occur. Any future development that occurs in the Project Area would be

<sup>&</sup>lt;sup>18</sup> Department of Toxic Controlled Substances, Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). https://www.envirostor.dtsc.ca.gov/public/map/?global\_id=60002866 accessed on December 16, 2021

required to comply with existing regulations related to hazardous materials. Therefore, with no proposed or approved development project and compliance of state and local laws and regulations for future projects, the Project by itself would result in no impacts related to hazardous materials sites. No further analysis is required.

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

**No Impact.** The Project Site is located within seven miles of the Los Angeles International Airport (LAX) and three miles of the Santa Monica Municipal Airport. Therefore, the Project Area is not located within two miles of any airport. Additional, the proposed Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, or foreseeably result in new development that would expose people residing or working in the Project Area to a safety hazard or excessive noise. Therefore, no impact will occur.

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

No impact. Emergency services in the City are provided by the City of Los Angeles Fire Department (LAFD) and the City of Los Angeles Police Department (LAPD). Emergency incidents of a larger natural or manmade disaster require coordinated efforts between the LAFD, LAPD and the City's Emergency Operation Center (EOC). The EOC is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the U.S. Department of Interior National All-Hazards approach to major disasters such as fires, floods, earthquakes, acts of terrorism and large-scale events in the City that require involvement by multiple city departments. The City of Los Angeles, General Plan Safety Element identifies the following streets as designated disaster routes serving the Project Area: Westwood Boulevard<sup>19</sup>. The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Area or surrounding area. The Project does not propose or approve any development project, nor alter development patterns. Emergency access to and from the Project Area would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). The reduced potential barriers to full occupancy could lead to an increase in transit, roadway, bicycle, or pedestrian traffic near or around locations within the Project Area. However, given the low-rise pedestrian nature of the structure in the area, commercial setting, and ample public transit, any increase is likely to be negligible. Therefore, it is not anticipated that the Project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

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

<sup>&</sup>lt;sup>19</sup> City of Los Angeles, General Plan Safety Element, Exhibit H Critical Facilities and Lifeline Systems. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety\_Element.pdf, accessed on December 21, 2021

**Less Than Significant Impact.** The Project Area is located within an urbanized area with a mix of commercial uses and various existing structures. The Selected Wildfire Hazard Areas are located mostly in the hilly areas of the City. Within the Project Area, Exhibit D Selected Wildfire Hazard Areas Map of the General Plan Safety Element identifies portions of the Project Area containing areas within Fire Buffer Zones<sup>20</sup>. However, the Project does not propose or approve any development or construction activities. Thus, the Project is not anticipated to increase risk or expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where existing structures are intermixed with wildlands. Prior to the issuance of any building permits for any future development to ensure any new development is designed and constructed to conform with all applicable Los Angeles Fire Code regulations protecting it from wildfires. This would include the addition of automatic sprinklers, smoke detectors and a fire alarm system for new development projects located in high fire severity zones. Therefore, the Project would result in less than significant impacts related to wildland fires. No further analysis is required.

<sup>&</sup>lt;sup>20</sup> City of Los Angeles, General Plan, Safety Element Exhibit D WildFire Hazard Areas. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety\_Element.pdf, accessed on December 21, 2021

#### X. HYDROLOGY AND WATER QUALITY

|   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|---|--------------------------------------|--|------------------------------------|-----------|
| Would the project:  |                                      |  |                                    |           |
| a. Violate any water quality standards or waste<br>discharge requirements or otherwise<br>substantially degrade surface or ground water<br>quality?   |                                      |  |                                    |           |
| b. Substantially decrease groundwater supplies<br>or interfere substantially with groundwater<br>recharge such that the project may impede<br>sustainable groundwater management of the<br>basin?   |                                      |  |                                    |           |
| <ul> <li>c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul> <li>i. Result in substantial erosion or siltation on- or off-site;</li> <li>ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</li> <li>iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. Impede or redirect flood flows?</li> </ul> </li> </ul> |                                      |  |                                    |           |
| <ul> <li>In flood hazard, tsunami, or seiche zones, risk<br/>release of pollutants due to project<br/>inundation?</li> </ul>  |                                      |  |                                    |           |
| e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?   |                                      |  |                                    |           |

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

**No Impact.** A significant impact would occur if a development discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) or the State Water Resources Control Board (SWRCB). The LARWQCB issued Waste Discharge Requirements for Municipal Stormwater and Urban Runoff Discharges (NPDES Permit No. CAS004001), which requires new development and redevelopment projects to incorporate stormwater mitigation measures. Depending on the type of project, either a SUSMP or a Site-Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves a project site.

The Project does not propose or approve a development or expand any land uses and does not produce any point source discharge (discharge of polluted water from a single point such as sewage outflow pipe). The Project is not anticipated to result in substantial new development or change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses that would result in a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Additionally, any new commercial occupants would be required to comply with all applicable water quality standards, wastewater discharge requirements, and other measures designed to protect surface and ground water quality. As such, the Project would result in a less than significant impact related to water quality and water discharge. No further analysis is required.

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

**No Impact.** A significant impact would occur if a proposed project would substantially deplete groundwater or interfere with groundwater recharge. Potable water would be supplied by the Los Angeles Department of Water and Power (LADWP), which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. The Project does not propose or approve any development project, nor changes permitted land uses. The proposed Project is likely to result in commercial uses occupying commercial spaces within existing structures. Any increase in commercial occupants caused by the Project is expected to comply with LADWP thresholds and guidelines that impact groundwater supplies. The Project is anticipated to mostly likely result in development activity such as typical tenant improvements or remodels to existing structures. Therefore, it is anticipated that the Project would not require direct additions or withdrawals of groundwater. There would be no impact on groundwater supplies or groundwater recharge, no further analysis is required.

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

- i. Result in substantial erosion or siltation on- or off-site;
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- iv. Impede or redirect flood flows?

No Impact. A significant impact would occur if a proposed project would substantially alter the drainage pattern of an existing stream or river so that erosion or siltation would result. In general, the Project Area is mostly built out with multi-family and commercial uses. There are no natural waterways and streams located in the Project Area<sup>21</sup>. In addition, the proposed Project does not propose or approve development, nor does it intensify or change any land uses. Significant alterations to existing drainage patterns within the Project Area and surrounding area would not occur as a result of the Project. As discussed in Section X(a) above, future development that occurs in the Project Area would be required to comply with all federal, state and local regulations regarding stormwater runoff, including the City's LID Ordinance and the City's UWWMP Best Management Practices (BMPs). Compliance with these regulatory measures would reduce the amount of surface water runoff in the Project Area after a storm event. In addition, compliance with construction related BMPs and/or the Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation on or off-site. Moreover, the Project does not construct any structures that would impede flood flows within a 100 year or 500-year flood plain. Therefore, it is not anticipated that the proposed Project would result in impacts related to stormwater drainage patterns that would cause flooding, contribute to excess polluted runoff, on- or off-site erosion or siltation impeding or redirecting of flood flows, as such, there would be no significant impact. No further analysis is needed.

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

**Less Than Significant Impact.** A significant impact would occur if a proposed project would be located within an area susceptible to inundation by seiche, tsunami, or inundation. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. The Project Area is not located in an area where it would be susceptible to a seiche. A tsunami is a great sea wave produced by a significant undersea disturbance. The Project Area is not in the Coastal Zone and is not susceptible to a tsunami or possible inundation.

Additionally, the Project Area is not in the Coastal Zone and is not susceptible to a tsunami or possible inundation in the event of a natural disaster. According to the Safety Element of the City of Los Angeles General Plan, Exhibit F 100-Year & 500-Year Flood Plains Map, the Project Area is not located within a 100-year or 500-year flood plain. Additionally, the General Plan Safety

<sup>21</sup> City of Los Angeles, Navigate LA. https://navigatela.lacity.org/navigatela, accessed on December 21, 2021

Element, Exhibit G identifies portions of the Project Area as areas susceptible to inundation<sup>22</sup>. However, the Project does not propose or approve any development, construction, or ground disturbing activity. Therefore, it is not anticipated that the Project would release pollutants due to Project inundation in flood hazard, tsunami or seiche zones, and a less than significant impact would occur.

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

**No Impact.** A significant water quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans. The Project does not propose or approve any construction activity. Thus, existing conditions are not expected to significantly change or cause a conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Any future development in the Project Area would continue to be subject to all applicable state or local water quality control plans or sustainable groundwater management plans. Therefore, the proposed Project would result in no impacts related to implementation of a water quality control plan or sustainable groundwater management plans.

<sup>&</sup>lt;sup>22</sup> City of Los Angeles, General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety\_Element.pdf, accessed on December 21, 2021

#### XI. LAND USE AND PLANNING

|   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact   |
|---|--------------------------------------|--|------------------------------------|-------------|
| Would the project:  |                                      |  |                                    |             |
| a. Physically divide an established community?  |                                      |  |                                    | $\boxtimes$ |
| <ul> <li>b. Cause a significant environmental impact due<br/>to a conflict with any land use plan, policy, or<br/>regulation adopted for the purpose of avoiding</li> </ul> |                                      |  |                                    | ⊠           |

or mitigating an environmental effect?

#### a) Physically divide an established community?

**No Impact.** A significant impact would occur if a proposed project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The Project does not propose or approve any development or construction. Additionally, the Project does not involve any street vacation or closures or result in development of new thoroughfares or highways which would divide established communities. Therefore, no impact would occur as it relates to the physical division of an established community. No further analysis is required.

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

**No Impact.** A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site, and would cause adverse environmental effects, which the General Plan and zoning are designed to avoid or mitigate.

In the City of Los Angeles, the General Plan Framework Element serves as the City's strategy for long-term growth and sets the citywide context to help guide the update of the Community Plans (Land Use Element) and citywide elements (e.g., Housing Element, Conservation Element, Air Quality Element, Safety Element, etc.). The City's Land Use Element consists of the 35 Community Plans, which include goals and land use policies to guide the physical development of specific areas throughout the City.

The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy or regulation. The Project Area consists of the Westwood Village Specific Plan area which is located in the Westwood Community Plan. The Project consists of an ordinance to amend the Westwood Village Specific Plan. The Project would support the vision and purpose of the adopted General Plan Framework and land use plans in a manner that is complementary

to the goals and policies of the City as it relates to urban form, neighborhood design, and economic development.

The proposed Project is consistent with several goals, objectives and policies of the City's General Plan Framework because it aims to reduce commercial vacancies which will enable its unique low-rise pedestrian-oriented district to thrive, enable this mixed-use center to thrive, and attract new businesses to fill those vacancies.

The proposed Project is also consistent with several goals, objectives, and policies of the Westwood Community Plan because it will reduce barriers to commercial vacancies which will enable its unique low-rise commercial center to flourish and provide opportunities for new compatible uses to fill those vacancies. As the goal is to fill existing vacant commercial structures, the Project will ensure the viability of the currently occupied stores and businesses and add new compatible uses to this established commercial center.

For reasons stated above, the Project will not conflict with the stated goals related to commercial uses in the City's General Plan Framework Element or the Westwood Community Plan. Therefore, no impact would occur, and no further analysis is necessary.

#### **XII. MINERAL RESOURCES**

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

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

**No Impact.** A significant impact would occur if a proposed project would result in the loss of availability of known mineral resources of regional value or locally important mineral resource recovery sites. According to the City's General Plan Conservation Element<sup>23</sup>, the Project Area has no lots classified by the City as containing significant mineral deposits nor is it designated for mineral extraction land use. In addition, the Project does not propose construction or approve development. Therefore, the Project would not result in the loss of availability of any known mineral resource that would be of value to the region, and no impact would occur.

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

**No Impact.** A significant impact would occur if a proposed project would result in the loss of availability of known mineral resources of regional value or locally important mineral resource recovery sites delineated on a local general plan, specific plan or other land use plan. As discussed in XII (a), there are no portions of the Project Area that are designated as a mineral resource as delineated in the City's General Plan Conservation Element. Therefore, the Project would result in no impact related to the loss of availability of a locally important mineral resource recovery site as delineated on a local general plan, specific plan or other land use plan.

<sup>&</sup>lt;sup>23</sup> City of Los Angeles General Plan, Conservation Element, Exhibit A Mineral Resources. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation\_Element.pdf, accessed on December 21, 2021

#### XIII. NOISE

|   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|---|--------------------------------------|--|------------------------------------|-----------|
| Would the project result in:  |                                      |  |                                    |           |
| a. Generation of a substantial temporary or<br>permanent increase in ambient noise levels in<br>the vicinity of the project in excess of<br>standards established in the local general plan<br>or noise ordinance, or applicable standards of<br>other agencies?  |                                      |  |                                    |           |
| <ul> <li>b. Generation of excessive groundborne<br/>vibration or groundborne noise levels?</li> </ul>   |                                      |  |                                    |           |
| c. For a project located within the vicinity of a<br>private airstrip or an airport land use plan or,<br>where such a plan has not been adopted,<br>within two miles of a public airport or public use<br>airport, would the project expose people<br>residing or working in the project area to<br>excessive noise levels? |                                      |  |                                    |           |

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

**Less Than Significant Impact**. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. The Citywide noise regulations are included in the LAMC, Chapter XI, Section 111.03 which sets forth presumed day/night ambient noise levels based on zones. Presumed ambient noise levels for residential zones are 50 dB(A) during the day and 40 dB(A) during the night and 60 dB(A) during the day and 55 dB(A) during the night for commercial uses. Section 112.05 of the LAMC establishes that between the hours of 7 a.m. and 10 p.m. a maximum noise level for construction equipment is 75 dB(A) at a distance of 50 feet when operated within 500 feet of a residential zone. Construction activity could result in temporary increases in ambient noise levels in the project area on an intermittent basis. Noise levels could fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

The Project will amend the Westwood Village Specific Plan to change various policies in an effort to facilitate a reduction in commercial vacancies in existing structure and encourage a mix of

uses. The Project does not propose or approve development, construction, or any ground disturbing activity. Any future development in the Project Area would need to comply with the Citywide Noise Regulations. Additionally, the anticipated increase in commercial occupancies that is expected to result from the Project will fit within the low-rise commercial center of the Project Area and is not expected to generate substantial ambient noise in excess of the City's noise regulations. Thus, the Project is not anticipated to result in substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project more than the City's noise regulations. The Project will result in a less than significant impact in ambient noise, and no further analysis is needed.

#### b) Generation of, excessive groundborne vibration or groundborne noise levels?

No Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation. Construction activities can generate varying degrees of vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. Unless heavy construction activities are conducted extremely close (within a few feet) to the neighboring structures, vibrations from construction activities rarely reach the levels that damage structures. The Project does not propose or approve any development project, operational use of any equipment, and does not include construction activities. The Project may result in entitlement requests, however since this area is highly urbanized, new development such as changes of use are likely to occur within existing structures and include typical tenant improvements that are not likely to include significant construction and excessive vibrations., Because the Project does not propose or approve any development, the Project would not have any corresponding operational impacts. Therefore, the Project is not expected to generate excessive groundborne vibration or groundborne noise levels. Consequently, the Project would result in no impacts and no further analysis is required.

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

**No Impact.** A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. The Project Area is located within seven miles of the Los Angeles International Airport (LAX) and three miles of the Santa Monica Municipal Airport. Therefore, no airport is located within two miles of the Project Area and the Project is not expected to expose people residing or working in or patronizing the Project Area to excessive noise levels. As such, the Project would have no impact and no further analysis is required.

#### XIV. POPULATION AND HOUSING

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

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

**Less Than Significant Impact.** A significant impact would occur if a proposed project would induce substantial population growth by locating new development such as homes, businesses, or infrastructure, with the effect of substantially inducing unplanned growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project would not induce substantial population growth in an area directly or indirectly. No increase in residential population resulting from the Project is anticipated. Therefore, it is not anticipated that the Project will induce substantial unplanned growth in the Project Area. Additionally, the Project does not propose to extend or add any roads or other infrastructure that would induce such growth. Therefore, a less than significant impact related to population growth would occur.

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

**No Impact.** A significant impact would occur if a proposed project would displace a substantial quantity of existing residences or a substantial number of people or housing units necessitating construction of replacement housing elsewhere. The entire Project Area is zoned for commercial use. The Project would not result in displacement of any existing housing or people necessitating the construction of replacement housing elsewhere. The Project does not propose or approve any development and would not displace any existing housing or people necessitating construction of replacement housing elsewhere. Therefore, the Project would not result in an impact in and no further analysis is required.

#### XV. PUBLIC SERVICES

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

|                             | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact   |
|-----------------------------|--------------------------------------|--|------------------------------------|-------------|
| a. Fire protection?         |                                      |  | $\boxtimes$                        |             |
| b. Police protection?       |                                      |  | $\boxtimes$                        |             |
| c. Schools?                 |                                      |  |                                    | $\boxtimes$ |
| d. Parks?                   |                                      |  |                                    | $\boxtimes$ |
| e. Other public facilities? |                                      |  |                                    | $\boxtimes$ |

#### a) Fire protection?

**Less Than Significant Impact.** The Los Angeles Fire Department (LAFD) is responsible for providing fire prevention, protection, and emergency medical services to the Project Area. A significant impact would occur if the LAFD requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain services. Although there are no Fire Stations within the Project area, the area is served by Los Angeles Fire Dept. Station 37 located at 1090 Veteran Avenue<sup>24</sup>.

The proposed Project will amend the Westwood Village Specific Plan to help reduce commercial vacancies in existing structures and encourage a greater mix of uses. The amendments are intended to address rising vacancies resulting from economic factors, including the COVID-19 pandemic and the rise of online shopping. Therefore, any reduction in vacancies will not result in public service needs beyond what has historically been required for the Plan Area. Since the proposed Project does not propose or approve any development, it would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Furthermore, any increase in customers visiting the area as a result of the anticipated increase in commercial occupancies is not expected to have an impact on capacity or service level. Therefore, the Project would result in a less than significant impact related to fire protection. No further analysis is required.

<sup>&</sup>lt;sup>24</sup> Los Angeles Fire Department Fire Stations. https://www.lafd.org/fire-stations/station-results, accessed on December 21, 2021

#### b) Police protection?

**Less Than Significant Impact.** The Los Angeles Police Department (LAPD) is responsible for providing police protection services to the Project Area. A significant impact would occur if the LAPD could not adequately serve a proposed project, necessitating a need for a new or physically altered station, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other service objectives. Although there are no Police Stations within the Project area, the area is served by West Los Angeles Community Police Station located at 1663 Butler Avenue<sup>25</sup>.

The Project will amend the Westwood Village Specific Plan to reduce commercial vacancies in existing structures and encourage a greater mix of uses. The Project does not propose or approve development in the Project Area that could impact service level or capacity. Additionally, any increase in customers visiting the area as a result of the anticipated increase in commercial occupancies is not expected to have an impact on capacity or service level. Therefore, the Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities. Additionally, the Project will not result in a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Since the Project is not anticipated to increase the demand for police services much less create the need for new or expanded police stations, there would be a less than significant impact on Police Services.

#### c) Schools?

**No Impact.** The Project Area is located within the boundaries of the Los Angeles Unified School District (LAUSD). A significant impact would occur if a proposed project would include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the school district. There are no schools located within the Project Area.

The Project would not introduce any new population into the area to require the construction of new or physically altered school facilities since the Project does not propose or approve any development project. Any future development would be subject to California Government Code Section 65995, which would allow LAUSD to collect impact fees from developers of new commercial space. Additionally, any increase in employment resulting from the increase in retail occupancies in existing low-rise commercial structures would not result in substantial employment growth that would generate demand for school facilities. Conformance to California Government Code Section 65995 is deemed to provide full and complete mitigation of impacts to school facilities. Therefore, the Project would result in no impact to public schools.

#### d) Parks?

**No Impact.** The City of Los Angeles Department of Recreation and Parks (RAP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The RAP operates and maintains over 16,000 acres of parkland and 444 park sites. A significant impact would occur if a proposed project exceeded the capacity or capability of the local park system to serve the proposed project resulting in the need for new or

<sup>&</sup>lt;sup>25</sup> Los Angeles Police Department. http://lapd-assets.lapdonline.org/assets/pdf/Citywide\_09.pdf accessed on December 21, 2021

physically altered park, the construction of which could cause substantial adverse impacts. There are no parks located within the Project Area.

The Project is an ordinance to amend the Westwood Village Specific Plan to help reduce commercial vacancies in existing structures. The Project does not propose or approve any development and does not directly or indirectly increase population in the Project Area. Therefore, it is not anticipated that the Project would create unplanned capacity or service level problems or result in substantial physical impacts associated with the provision or new or altered parks facilities. Accordingly, the Project would result in no impact on park facilities.

#### e) Other public facilities?

**No Impact.** A significant impact would occur if a proposed project would result in substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which exceed the capacity available to serve the project area, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts. The Los Angeles Public Library (LAPL) provides library services within the City of Los Angeles. The LAPL provides services at the Central Library, 8 Regional Branch Libraries and 72 Community Branch Libraries and 4 Bookmobiles. Although there are no Public Libraries within the Project area, the area is served by Westwood Branch Library located at 1246 Glendon Avenue.

The Project consists of an ordinance to amend the Westwood Village Specific Plan to help reduce commercial vacancies in existing structures and encourage a greater mix of uses. The Project does not propose or approve any development and would not cause a substantial increase in population. The Project would not create substantial capacity or service level problems that would require the provision of new or expanded public facilities in order to maintain an acceptable level of service for libraries and other public facilities. Additionally, any increase in employment resulting from the increase in retail occupancies in existing low-rise commercial structures would not result in substantial employment growth that would generate demand for other public facilities As such, there would be no increase in demand for library services and resources and no need for additional library resources or facilities to be constructed. Therefore, the Project would result in no impact to libraries and other public facilities. No further analysis is required.

#### XVI. RECREATION

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

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

**No Impact.** A significant impact would occur if a project resulted in substantial population growth that would generate a demand for recreation and park services such that substantial physical deterioration of the park facilities would occur or be accelerated. The Department of Recreation and Parks operates and maintains over 16,000 acres of parkland and 444 park sites, including Westwood Park and Westwood Gardens Park, which are located near the Project Area. The Project does not propose or approve any development or uses that would directly or indirectly increase population in the Project Area that would increase the use of existing and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. As such, the Project would have no impact on park and recreation facilities. No further analysis is required.

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

**No Impact.** A significant impact would occur if a project resulted in substantial population growth that would generate a demand for recreation and park services requiring the construction of new or physically altered park facilities within the project area. The Department of Recreation and Parks operates and maintains hundreds of athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, and 12 museums located throughout the City<sup>26</sup>. The

<sup>&</sup>lt;sup>26</sup> Los Angeles Recreation and Parks. https://www.laparks.org/department/who-we-are accessed on December 21, 2021

Project is limited to an ordinance to amend the Westwood Village Specific Plan. The Project, by itself, does not propose or approve any development or uses which would require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, no impact on park and recreation facilities would occur. No further analysis is required.

#### XVII. TRANSPORTATION

|    |   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact   |
|----|---|--------------------------------------|--|------------------------------------|-------------|
|    | Would the project:  |                                      |  |                                    |             |
| a. | Conflict with a program, plan, ordinance or<br>policy addressing the circulation system,<br>including transit, roadway, bicycle and<br>pedestrian facilities? |                                      |  |                                    |             |
| b. | Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?  |                                      |  |                                    |             |
| C. | Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? |                                      |  |                                    |             |
| d. | Result in inadequate emergency access?  |                                      |  |                                    | $\boxtimes$ |

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

**No Impact.** A significant impact may occur if a project would conflict with a program, plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. The City of Los Angeles has adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible, and sustainable transportation system for all users. The Circulation Element of the City's General Plan, the Mobility Plan 2035, offers a comprehensive vision and set of policies and programs for the City and aims to provide streets that are safe and convenient for all users. Furthermore, the Department of Transportation's Vision Zero Los Angeles aims to reduce transportation fatalities to zero by using extensive crash data analysis to identify priority corridors and intersections and applying safety countermeasures.

The Project consists of an ordinance to amend the Westwood Village Specific Plan. The Project does not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The Specific Plan's parking regulations will be amended to be consistent with the General Zoning Code requirement and to align with the City's Mobility goals. Under the existing Specific Plan, certain types of projects in the Plan Area require additional parking beyond what is required under the General Zoning

Code. Given the overabundance of parking in the Plan Area, additional parking beyond what is required of the zoning code is not needed. Westwood Village is a pedestrian oriented transit rich area with a future Metro rail stop scheduled to be in operation in 2025. Westwood Village also has an extensive transit network which includes several bus lines serviced by the Big Blue Bus and Metro, and an existing network of micro mobility options such as: rideshare, bike-share, and dockless scooters. Projects in the Westwood Village Specific Plan will still need to meet the Citywide parking requirements of the underlying zone. Additionally, the Project does not increase population or provide land use incentives that would increase the density, FAR or height of development in the Project Area. The Project does not propose or approve any development and is not expected to generate significant traffic impacts, which would conflict with an applicable plan, ordinance or policy, related to traffic. Therefore, the Project would result in no impacts related to the circulation system. No further analysis is required.

#### b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. A significant impact may occur if a project's Vehicle Miles Traveled (VMT) substantially increase compared to existing counts. The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) which states that land use projects that indicate VMT exceeding an applicable threshold of significance may indicate a significant impact. Pursuant to CEQA Guidelines section 15064.3(b)(1), projects that decrease VMT in a proposed project area compared to existing conditions should be presumed to have a less than significant transportation impact. CEQA Guidelines section 15064.3, subdivision (b), also states that transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. The Project is an ordinance to amend the Westwood Village Specific Plan. No VMT would be generated from the Project, that would otherwise have occurred from any new development, since no development project is approved or proposed as part of the Project. The entire Project Area is within a pedestrian-oriented Transit Priority Area (TPA). Moreover, the Project reduces parking requirements for changes of use and relaxes parking provisions in the Specific Plan. The Project also includes an amendment to the Specific Plan to add provisions to comply with LAMC Section 12.26.J - Traffic Demand Management Ordinance No. 168,700, which includes several trip reduction strategies to help alleviate congestion and will likely help to reduce VMT overall. Therefore, the Project's amendments to relax parking requirements and additional language to comply with LAMC 12.26.J, is not likely to result in an inconsistency with CEQA Guidelines Section 15064.3, subdivision (b). Furthermore, the Specific Plan's parking regulations will be amended to be consistent with the General Zoning Code requirement and to align with the City's Mobility goals. Therefore, the Project would result in less than significant impacts related to any applicable congestion management plan. No further analysis is required.

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

**No Impact.** A significant impact would occur if a proposed project included new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. No hazardous design features or incompatible land uses would be introduced with the Project that would create significant hazards to the surrounding roadways.

The Project does not propose construction nor approve any development, thus no increase in hazards due to geometric design features or incompatible uses would occur to local vehicular circulation routes and patterns, or impede public access or travel on any public rights of way. The Project would result in no impacts related to traffic hazards. No further analysis is required.

#### d) Result in inadequate emergency access?

**No Impact.** A significant impact may occur if a project design does not provide emergency access meeting the requirements of the Fire Department or threatens the ability of emergency vehicles to access and serve a project site or adjacent uses. As previously identified in Section IX(f) per the City's General Plan Safety Element (Exhibit H, Critical Facilities & Lifeline Systems, 1996), the nearest emergency/disaster route serving the Project Area is Westwood Boulevard. The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Area or surrounding area. The Project is an ordinance to amend the Westwood Village Specific Plan. The Project does not propose or approve any development or change or expand any land uses. As such, the Project would not require the closure of any public or private streets, would not impede access to the City's designated disaster routes, and would not impair the City's emergency response plan. Therefore, the Project would result in no impact with respect to inadequate access to emergency routes.

#### XVIII. TRIBAL CULTURAL RESOURCES

set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a

California Native American tribe.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

|   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|---|--------------------------------------|--|------------------------------------|-----------|
| <ul> <li>a. Listed or eligible for listing in the California<br/>Register of Historical Resources, or in a local<br/>register of historical resources as defined in<br/>Public Resources Code section 5020.1(k), or</li> </ul>                          |                                      |  |                                    |           |
| b. A resource determined by the lead agency, in<br>its discretion and supported by substantial<br>evidence, to be significant pursuant to criteria<br>set forth in subdivision (c) of Public Resources<br>Code Section 5024.1. In applying the criteria |                                      |  |                                    |           |

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

**No Impact.** A substantial adverse change to a Tribal Cultural Resource (TCR), as defined in Public Resources Code §21074, is a significant effect on the environment under CEQA. Assembly Bill 52 ("AB 52"), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact TCRs, and establishes a formal notification and consultation process for California Native American Tribes as part of CEQA. TCRs include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR.

Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of the proposed projects. A tribe must respond in writing within 30 days of the lead agency's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Area . On January 10, 2022, AB52 Tribal Consultation Notice letters were mailed to the following California Native American Tribes via certified mail:

- Fernandeño Tataviam Band of Mission Indians
- Gabrieleno Band of Mission Indians Kizh Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrielino-Tongva Tribe
- San Fernando Band of Mission Indians
- Soboba Band of Luiseño Indians
- Torres Martinez Desert Cahuilla Indians

To date, Staff has received one letter from the Gabrieleno Band of Mission Indians – Kizh Nation dated January 31, 2022, expressing agreement with the Specific Plan amendment, while requesting consultation for any and all future projects when ground disturbances will be occurring within the Project Area. No other tribes responded to the notification to date, and no additional information and materials related to tribal cultural resources have been submitted. The proposed Project will amend the Westwood Village Specific Plan to better support a mix of uses and reduce commercial vacancies. No land use changes are proposed. The Project does not propose or approve any development or construction and would not authorize new land uses. Therefore, the Project will not result in an impact to Tribal Cultural resources.

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

**No Impact.** See response to Section XVIII (a) above. Further, any future development projects requiring a Negative Declaration, Mitigated Negative Declaration or an Environmental Impact Report will need to comply with AB 52 and conduct the necessary research and/or prepare the necessary reports to determine if the individual development project would cause a substantial adverse change in the significance of a tribal cultural resource. The proposed Project includes

no proposed development project, requires no ground disturbing or any other related construction activity, and does not induce development. Therefore, the proposed Project will result in no impacts. No further analysis is required

#### XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Less Than Significant Impact. A significant impact would occur if a proposed project would exceed water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. The Project consists of an ordinance to amend the Westwood Village Specific Plan to reduce commercial vacancies in existing structures. A decrease in commercial vacancies could lead to an increase in the use of utilities, such as electricity, natural gas, or telecommunication facilities. However, any increase in the use of such utilities would be less than significant given these utilities were designed to serve the existing structures in the Plan Area and reducing vacancies would not add to these structures.

The Project does not propose or approve development or ground disturbing activity. The Project is likely to result in supporting to reduce vacancies and this activity might also include remodeling or typical tenant improvements of structures that are already constructed to be serviced by public utilities. As such, existing conditions are not expected to significantly change related to public facilities. Future development projects would be reviewed on a case-by-case basis and depending on the scope of the development project would be subject to its own environmental review. Therefore, the proposed Project would not increase the demand for water and the generation of wastewater, consequently increasing the demand of treatment facilities compared to existing conditions such that physical expansion of the treatment facilities or construction of a new treatment facility may be required. Additionally, the Project would not increase consumption of electrical power and natural gas such that existing supply facilities may need to be expanded or relocated. Similarly, telecommunications facilities would not need to be expanded or relocated as the Project does not propose or approve development. As such, the Project does not propose nor will it require construction of new water, wastewater treatment, storm water drainage facilities, electric power, natural gas, or telecommunication facilities or expansion of existing facilities. One of the goals of the Project is to help reduce vacancies in the future, and while a reduction to the vacancy rates may result in an increase in the use of utilities, such as electric power, natural gas, or telecommunications facilities, that increase is anticipated to result in a less than significant impact as the utilities have been designed to serve the existing structures. Reducing vacancies would not likely add significant demand at a level that would incur impact. Thus, the Project does not propose or approve any development and it is not anticipated to significantly alter existing development or development patterns. No impact would occur.

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

**Less Than Significant Impact.** A significant impact would occur if a proposed project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City and conducts water planning based on forecast population growth. As the Project Area is located within an urban environment, any future development within the Project Area would likely be connected to the City's water line and

serviced by LADWP. Prior to any construction activities for future development projects, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the project, and any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately serve the project would be undertaken as part of the project.

The Project consists of an ordinance to amend the Westwood Village Specific Plan to help reduce commercial vacancies in existing structures. A decrease in commercial vacancies could lead to an increase in the use of water. However, any increase in the use of water supplies would be less than significant given these water supplies were designed to serve the existing structures in the Plan Area and reducing vacancies is not likely to significantly impact water supply. The Project does not alter existing development or development patterns. No development project is proposed or approved as part of the Project. One of the goals of the Project is to help reduce vacancies in the future, and while a reduction to the vacancy rates may result in an increase in the use of water supply, as water utilities have been designed to serve the existing structures. Reducing vacancies would not likely add significant demand at a level that would incur impact.

Thus, the Project would be consistent with the anticipated Citywide growth, and the Project demand for water is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities beyond those already considered in the LADWP 2015 Urban Water Management Plan (UWMP). Therefore, it is not foreseeable that there would be insufficient water supplies available to serve the Project Area and future development in the Project Area during the normal, dry, and multiple dry years. Less than significant impacts would occur, and no further analysis is needed.

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

Less Than Significant Impact. See response to Section XIX (b) above. As previously mentioned, LADWP conducts water planning based on population growth forecasts. The Project is not anticipated to impact population growth in the City since the Project itself does not propose or approve any development project. The Project consists of an ordinance to amend the Westwood Village Specific Plan to help reduce commercial vacancies in existing structures. A decrease in commercial vacancies could lead to an increase in the amount of wastewater generated by retail occupants. However, any increase in wastewater would be less than significant given that wastewater treatment providers were intended to serve the existing structures in the Plan Area and reducing vacancies would not add to these structures. As such, the Project will not change demand for water or wastewater treatment. One of the goals of the Project is to help reduce vacancies in the future, and while a reduction to the vacancy rates may result in an increase in the use of water consumption by the commercial occupants, but not expected to be significant. Wastewater treatment provides already service the Project area, and the water utilities have been designed to serve the existing structures. Reducing vacancies would not likely add significant demand at a level that would incur impact.

The Project does not significantly alter existing development or development patterns. Therefore, a less than significant impact will occur as it relates to adequate capacity to serve the Project's projected demand for wastewater treatment and the provider's existing commitment.

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

Less Than Significant Impact. The Los Angeles Bureau of Sanitation (LABOS) and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the Project Area. Construction waste materials are expected to be typical construction debris, including wood, paper, glass, plastic, metals, cardboard and green wastes. The Project consists of an ordinance to amend the Westwood Village Specific Plan to reduce commercial vacancies in existing structures. A decrease in commercial vacancies could lead to an increase in the amount of solid waste generated. However, any increase in solid waste would be less than significant given that local infrastructure was designed to serve the existing structures in the Plan Area and reducing vacancies would not likely impact the attainment of solid waste reduction goals. Waste generated by future individual development projects would be assessed on a case-by-case basis through the environmental review process. Pursuant to the California Green Building Code, individual project applicants would be required to recycle/divert 65 percent of the construction waste (CALGreen Sections 4.408 and 5.408). Since the Project does not involve a development and does not alter existing development or development patterns, impacts are expected to be less than significant. Therefore, the Project is expected to have a less than significant impact related to the generation of solid waste in excess of State or local standards, exceed the capacity of local infrastructure or impair the attainment of solid waste reduction goals. No further analysis is necessary.

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

**Less Than Significant Impact.** A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project does not significantly alter existing development or development patterns. The Project, does not propose or approve any development that would generate solid waste – also see explanations in Sections XIX a, b, c, and d above. Current and future individual development projects are required and would continue to be required to comply with all federal, state, and local statutes and regulations related to solid waste. All applicable regulations would ensure that the impact to reduction statutes and regulations related to solid waste is less than significant.

#### XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

| Would  | the project:   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact |
|--------|--|--------------------------------------|--|------------------------------------|-----------|
| vvouiu |  |                                      |  |                                    |           |
| a.     | Substantially impair an adopted emergency response plan or emergency evacuation plan?  |                                      |  |                                    |           |
| b.     | Due to slope, prevailing winds, and other<br>factors, exacerbate wildfire risks, and thereby<br>expose project occupants to pollutant<br>concentrations from a wildfire or the<br>uncontrolled spread of a wildfire?   |                                      |  |                                    |           |
| C.     | Require the installation or maintenance of<br>associated infrastructure (such as roads, fuel<br>breaks, emergency water sources, power lines<br>or other utilities) that may exacerbate fire risk<br>or that may result in temporary or ongoing<br>impacts to the environment? |                                      |  |                                    |           |
| d.     | Expose people or structures to significant<br>risks, including downslope or downstream<br>flooding or landslides, as a result of runoff,<br>post-fire slope instability, or drainage<br>changes?   |                                      |  |                                    |           |

### a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

**Less Than Significant Impact.** The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities.

According to the Safety Element, the Project Area is located along the following designated disaster routes: Westwood Boulevard. However, the Project does not significantly alter existing development or development patterns. The Project also does not propose or approve development, nor does it modify any existing regulations regarding permanent street closures which may directly or indirectly impair an adopted emergency response plan or emergency evacuation plan. The Project does not change the designation of Westwood Boulevard. The

Project does not include construction that would impact street frontages or access along Westwood Boulevard. Therefore, it is unlikely that the Project would impair an emergency evacuation plan.

The Project consists of an ordinance to amend the Westwood Village Specific Plan to help reduce commercial vacancies in existing structures and helps to alleviate potential barriers to commercial activity. A decrease in commercial vacancies and possible increase of new commercial businesses starting their businesses could result in more pedestrian activity and visitors in the Project area. This possible increase can possibly result in an increased use of emergency evacuation routes or emergency facilities during an emergency situation.

During an emergency situation, it is likely that specific evacuation routes may be used or new routes may emerge depending on the emergency situation. As discussed in a previous Section IX.F (Hazards and Hazardous Materials), the Emergency Management Department manages and coordinates emergencies, including coordination with the Los Angele Fire Department, LADOT, and LAPD regarding evacuation routes for several types of emergencies. It is speculative to discuss which type of emergency could arise, but it is likely that the EMD would be prepared to coordinate and manage an emergency.

The proposed Project does not include amendments that alter the City's adopted Emergency response or emergency evacuation plans. The Project area is serviced by walkable and accessible pedestrian routes, and it is likely to offer multiple ways to access or evacuate this Project area by walking, by public transit, and/or by car. The Project's amendments, support the pedestrian-oriented environment in the Project area and is not likely to interfere or impair an adopted emergency plan or emergency evacuation. In addition, future development that would likely occur as a result of commercial vacancies is likely to occur to respond to commercial vacant listings (See Figure 3 in Section 3.2 Environmental Settings, subsection 3.2.2.Existing Conditions). The sample query discussed includes a map that shows the current commercial vacancies interspersed throughout the Project area. Such commercial activity and building permits would most likely include typical tenant improvements and remodels and are not likely to impact an adopted emergency plan. Should development occur in the Project Area such construction and development would be required during construction to comply with construction management plans that would be implemented to ensure adequate circulation and emergency access. As such, the Project is anticipated to result in a less than significant impact to an adopted emergency response plan or emergency evacuation plan. No further analysis is needed.

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

**Less Than Significant Impact.** A portion of the Project Area is located within a Fire Buffer Zone. The Project Area is wholly within an urbanized area. Additionally, the Project does not propose or approve a development project and does not intensify or change any land uses nor does it alter existing development or development patterns, including in Wildfire Hazard Areas. Therefore, impacts would be less than significant relative to slope, prevailing winds and other factors that could exacerbate wildfire risks and expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, no further analysis is needed.

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

**No Impact.** The Project does not propose or approve development or any construction. Given the Project's scope, no impacts would occur that would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Thus, the Project would result in no impact and no further analysis is needed.

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

**Less Than Significant Impact.** As discussed in Section IX (g) and Section XX (b) above, a portion of the Project Area is located within a City-designated Fire Buffer Zone. However, the Project does not propose or approve development and does not significantly alter existing development or development patterns. Therefore, it is anticipated that the Project will result in a less than significant impact as it relates to exposure of people or structures to significant risks - including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. No further analysis is needed.

#### XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

**Less Than Significant Impact**. Based on the analysis in this Initial Study, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Compliance with existing regulations would reduce impacts to less than significant levels. No further analysis is required.

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

**No Impact.** As indicated above, the proposed Project will not result in any individually significant impacts. Further, the Project does not propose or approve any development or construction, does not change any land uses, and does not alter any existing development or development patterns, and is not anticipated to result in substantial new development. As such, the Project will not result in any significant impacts or cumulatively considerable impacts.

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

**No impact.** As identified throughout the analysis, the Project would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. No other impacts have been identified that would result in adverse effects. No impacts would occur, no further analysis is needed.