I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the Paseo Marina Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section of this Draft EIR is an overview of the purpose and focus of this Draft EIR, a general description of the Project and proposed entitlements, a description of the organization of this Draft EIR, an overview of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR.

1. Purpose of this Draft EIR

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by Section 15161 of the CEQA Guidelines. Furthermore, this Draft EIR complies with Section 15064 of the CEQA Guidelines which discusses determining the significance of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial

Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on June 9, 2017, for a 30-day review period. On June 23, 2017, a second notice was distributed to inform the public that the comment period for the NOP had been extended through July 18, 2017. The Initial Study, NOP, the NOP extension notice, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Aesthetics
- Air Quality
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise
- Public Services (including fire protection, police protection, schools, parks and recreation, and libraries)
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities and Service Systems (including water supply and infrastructure, wastewater, and solid waste)
- Energy Conservation and Infrastructure

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to agricultural and forestry resources; biological resources; cultural resources; mineral resources; and population and housing. Therefore, these areas were not analyzed in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

I. Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.

II. Project Description. This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.

III. Environmental Setting. This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built in the vicinity of the Project Site.

IV. Environmental Impact Analysis. This section contains the environmental setting, project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: aesthetics; air quality; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use; noise; public services (fire protection, police protection, schools, parks and recreation, and libraries); transportation/traffic; tribal cultural resources; utilities and service systems (water supply and infrastructure, wastewater, and solid waste); and energy conservation and infrastructure.

V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; No Project/Development in Accordance with Existing Zoning Alternative; Reduced Density Alternative; and Reduced Excavation Alternative.

VI. Other CEQA Considerations. This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.

VII. References. This section lists the references and sources used in the preparation of this Draft EIR.

VIII. Acronyms and Abbreviations. This section provides a list of acronyms and abbreviations used in this Draft EIR.

IX. List of Preparers. This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A—Initial Study, NOP, and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—Notice of Preparation
  - Appendix A.3—NOP Comment Letters
- Appendix B—Technical Appendix for Air Quality and Greenhouse Gas Emissions
  - Appendix B.1—Air Quality and Greenhouse Gas Emissions Methodology
  - Appendix B.2—Air Quality Worksheet
  - Appendix B.3—Greenhouse Gas Worksheets
- Appendix C—Geotechnical Feasibility Report
- Appendix D—Methane Investigation Report
- Appendix E—Phase I Environmental Site Assessment
- Appendix F—Water Resources Technical Report
- Appendix G—Noise Calculation Worksheets
- Appendix H—Los Angeles Fire Department Response Letter
- Appendix I—Los Angeles Police Department Response Letter
- Appendix J—Los Angeles Unified School District Response Letter
- Appendix K—Los Angeles Department of Recreation and Parks Response Letter

- Appendix L—Los Angeles Public Library Response Letter
- Appendix M—Traffic
  - Appendix M.1—Traffic Study
  - Appendix M.2—Los Angeles Department of Transportation Memorandum of Understanding
  - Appendix M.3—Los Angeles Department of Transportation Assessment Letter
- Appendix N—Tribal Cultural Resources
  - Appendix N.1—Tribal Cultural Resources Report
  - Appendix N.2—AB 52 Notification Letter and Delivery Confirmations
  - Appendix N.3—Native American Heritage Commission Sacred Lands File Search Results
  - Appendix N.4—Request for Consultation
  - Appendix N.5—Record of AB 52 Consultation
- Appendix O—Water Supply and Infrastructure
  - Appendix O.1—Water Supply Assessment
  - Appendix O.2—Utility Report
- Appendix P—Energy Conservation and Infrastructure
  - Appendix P.1—Energy Calculations
  - Appendix P.2—LADWP “Will Serve” Letter
  - Appendix P.3—SoCal Gas “Will Serve” Letter
- Appendix Q—Alternatives Traffic Analysis

4. Existing Project Site Conditions

The Project Site is currently improved with three structures, including a two-story Barnes & Noble bookstore located along the northeast corner of the Project Site, near the Maxella Avenue and Glencoe Avenue intersection; a single-story building providing a United States Post Office and other retail uses located generally within the southern portion

of the Project Site, along Glencoe Avenue; a two-story commercial and retail building located generally within the western portion of the Project Site; and associated surface parking and circulation areas. The existing surface parking areas within the Project Site include a total of 418 parking spaces. Landscaping within the Project Site includes ornamental landscaping and hardscape features. Street trees and trees within the Project Site consist of various non-native species, including palm, pine, fig, gum, fern, cajeput, carrotwood, octopus, strawberry, and olive trees.

The Project Site is located within the planning boundary of the Palms–Mar Vista–Del Rey Community Plan area and is designated for Limited Manufacturing land uses (CM, MR1, and M1 zones).

The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as [Q]M1-1 (Qualified Limited Industrial, Height District 1). The M1 zone permits any commercial land use permitted in the MR1 and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. Height District 1 within the M1 zone normally imposes no height limitation and a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, adopted in 1992, the Q conditions for the Project Site restrict building heights to 45 feet. The Q Conditions also provide that if any use not permitted in the MR1 zone is developed on the Project Site, the FAR for such uses shall be limited to 0.5 to 1. In addition, per Ordinance No. 167,962, no portion of a building or structure shall exceed 35 feet in height within 50 feet of the Glencoe Avenue right-of-way. The Q conditions also establish recycling and graffiti removal requirements for the Project Site.

5. Description of the Proposed Project

a. Project Overview

The Paseo Marina Project (Project) would construct a new mixed-use development on an approximately 6.06-acre (263,811-square-foot) portion of the existing Marina Marketplace shopping center (Project Site) located in the Palms–Mar Vista–Del Rey Community Plan area of the City of Los Angeles. The Project would involve the development of 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including up to 13,650 square feet of retail space and up to 13,650 square feet of restaurant space. The proposed multi-family residential and commercial uses would be provided within three seven-story buildings with a maximum height of 77 feet. Additionally, the Project would provide 1,217 parking spaces within two subterranean levels and two above-grade parking levels within each of the three buildings. The Project would remove 100,781 square feet of existing floor area

and construct 674,329 square feet of new floor area, resulting in a net increase of 573,548 square feet of new floor area within the Project Site.

b. Project Design

The proposed multi-family residential and neighborhood-serving commercial uses would be provided within three buildings that would be organized around an outdoor pedestrian paseo. The pedestrian paseo would be oriented both east–west across the Project Site and north–south through the center of the Project Site and would connect to a public plaza along the northwestern portion of the Project Site and a publicly accessible, privately maintained open space area along the southwestern portion of the Project Site.

The proposed commercial uses would be concentrated at the ground level within each of the buildings. Also at the ground level, the Project would include townhomes, residential lobbies, and leasing areas. Above the second story of the proposed buildings would be a podium level, which would include amenities such as pools, a spa, and outdoor kitchens with lounges and seating. The proposed multi-family dwelling units consisting of studio, one-bedroom, and two-bedroom units would be distributed from the ground level up to the seventh story of the three buildings. Along Glencoe Avenue, Building 2 and Building 3 would feature building step backs to form landscaped terraces on the fourth, sixth, and seventh floor that would, in conjunction with the amenity deck at the podium level, serve to reduce the perceived mass of these buildings when viewed from Glencoe Avenue.

The proposed mixed-use buildings would be designed in a contemporary architectural style. Cantilevered balcony decks, horizontal overhangs, and canopies would be integrated with vertical fins and other architectural elements, such as balcony and stair railing and shading devices. These architectural elements would provide horizontal and vertical articulation that would serve to break up the building planes and modulate building massing. A variety of exterior finishes, materials, and textures would be integrated into the overall design of the various buildings, including tile or stone veneer, storefront windows, aluminum louvers, wood, exterior plaster, glass and metal railings, and integrated signage and lighting.

c. Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via five driveways, including two entry/exit driveways along the access driveway located adjacent to Building 1, one entry/exit driveway along Maxella Avenue, one entry/exit driveway along Glencoe Avenue, and one entry/exit driveway located along the southern boundary of the Project Site.

New pedestrian access points would be created throughout the Project Site via the pedestrian paseo and internal street. From the pedestrian paseo and the public plaza proposed along the northwestern portion of the Project Site, pedestrians would be able to access Marina Marketplace shopping center-related uses across Maxella Avenue via the existing pedestrian crosswalk along Maxella Avenue. At the southern terminus of the pedestrian paseo, pedestrians would be able to access Marina Marketplace shopping center-related uses south of the Project Site. Bicycle access would also be provided throughout the Project Site, including via the vehicular access points on Glencoe Avenue and Maxella Avenue. Bicycle storage areas would be included in the ground-floor level of the proposed buildings. In total, in accordance with the requirements of the LAMC, approximately 724 bicycle parking spaces (658 long-term spaces and 66 short-term spaces) would be provided for the proposed residential uses, and approximately 28 bicycle parking spaces would be provided to support the retail uses.

The proposed uses would be supported by 1,217 parking spaces, which meets the parking requirements as set forth in the LAMC, that would be distributed throughout the Project Site in two subterranean levels that would extend to a depth of approximately 28 feet and in two above grade parking levels located within each of the three buildings. Parking for residents would be provided within the above- and below-grade parking levels within the buildings while parking for the commercial uses would be provided primarily within the ground floor parking levels. The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking.

d. Landscaping and Open Space

The Project would provide a variety of open space and recreational amenities. Private open space and recreational amenities available to Project residents and guests of residents would include: balconies, paved plazas with seating, landscaped paseos, courtyard areas at the podium level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. To enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. In total, in accordance with the requirements of the LAMC, the Project would provide approximately 70,175 square feet of open space.

e. Lighting and Signage

The Project would include low-level exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would also be incorporated throughout the Project Site. All lighting would comply with current energy standards and codes as well as design requirements while providing appropriate light levels. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light trespass from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting, including lighting fixtures on the pool deck, would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto nearby residential uses. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All exterior and interior lighting shall meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the Los Angeles Municipal Code. Proposed signage would include identity signage, either blade or monument, on the three major Project Site corners, building and tenant signage, and general ground level and way-finding pedestrian signage. No off-premises or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

f. Sustainability Features

The mixed-use Project has been designed based on principles of smart growth and environmental sustainability, by combining residential dwelling units and commercial uses, creating an emphasis on walkability and public open space, and implementing bike-friendly infrastructure within proximity to multiple public transit options, in addition to being located near existing infrastructure needed to serve the proposed uses. The new buildings would be designed and constructed to incorporate environmentally sustainable design features equivalent to Silver certification under the U.S. Green Building Council's LEED® Rating

System for new construction. "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (Ordinance No. 184,692). Such features would include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible.

The Project would also comply with the Los Angeles Green Building Code, which is based on the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations).

6. Project Construction and Scheduling

Project construction is anticipated to occur in one phase and would commence in 2020 with demolition of the existing three structures and associated surface parking lot area, followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction, which would be approximately 37 months, is anticipated to be completed in 2023. It is estimated that approximately 220,000 cubic yards of soil would be hauled from the Project Site during the excavation phase. The haul route from the Project Site is anticipated to be via Glencoe Avenue to Mindanao Way to SR-90. Incoming haul trucks would be anticipated to access the Project Site via SR-90 to Lincoln Boulevard to Maxella Avenue.

7. Necessary Approvals

Approvals required for development of the Project may include, but are not limited to, the following:

- Pursuant to LAMC Section 11.5.6 and Section 12.32, General Plan Amendment to the Palms–Mar Vista–Del Rey Community Plan to change the Community Plan land use designation from Limited Manufacturing to General Commercial;
- Pursuant to LAMC Section 12.32.Q, a Vesting Zone and Height District Change from [Q]M1-1 to (T)(Q)C2-2D;
- Pursuant to LAMC Section 16.05, Site Plan Review;
- Pursuant to LAMC Section 12.24.W, a Master Conditional Use Permit to allow the onsite and offsite sale of a full line of alcoholic beverages;
- Pursuant to LAMC Section 12.20.2, Coastal Development Permit;

- Pursuant to California Government Code Sections 65590 and 65590.1 (commonly called the Mello Act) and the City of Los Angeles Interim Administrative Procedures for Complying with the Mello Act, Mello Act Compliance Review;

- Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map and haul route;

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

8. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts on aesthetics; air quality; noise; land use; transportation/traffic; and utilities and service systems. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters. Additionally, authors of comment letters were concerned with cumulative impacts on air quality, noise, transportation/traffic and utilities and service systems.

9. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on June 9, 2017, for a 30-day review period. On June 23, 2017, the review period was extended to July 18, 2017. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

10. Summary of Environmental Impacts

Table I-1 on page I-12 provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. These impacts are summarized as follows:

Table I-1
Summary of Impacts Under the Project

Environmental Issue	Proposed Project Impact
A. AESTHETICS	
Scenic Vistas	Less Than Significant
Visual Character	
Construction	Less Than Significant
Operation	Less Than Significant
Shading	Less Than Significant
Light/Glare	
Construction	Less Than Significant
Operation	Less Than Significant
B. AIR QUALITY	
Construction	
Regional Emissions[1]	**Significant and Unavoidable**
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Operation	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
C. GEOLOGY AND SOILS	
Surface Rupture	Less Than Significant
Strong Seismic Ground Shaking	Less Than Significant
Liquefaction	Less Than Significant with Mitigation
Soil Erosion	Less Than Significant
Subsidence	Less Than Significant
Collapsible Soils	Less Than Significant
Expansive Soils	Less Than Significant
Landform Alteration	Less Than Significant
D. GREENHOUSE GAS EMISSIONS	Less Than Significant
E. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant
Operation	Less Than Significant
F. HYDROLOGY AND WATER QUALITY	
Surface Water Quality	
Construction	Less Than Significant
Operation	Less Than Significant

[1] *As discussed in Section IV.B, Air Quality, of this Draft EIR, cumulative impacts from regional emissions during construction would be significant and unavoidable.*

Table I-1 (Continued)
Summary of Impacts Under the Project

Environmental Issue	Proposed Project Impact
Groundwater Quality	
Construction	Less Than Significant
Operation	Less Than Significant
Surface Water Hydrology	
Construction	Less Than Significant
Operation	Less Than Significant
Groundwater Hydrology	
Construction	Less Than Significant
Operation	Less Than Significant
G. LAND USE	
Land Use Compatibility	Less Than Significant
Land Use Consistency	Less Than Significant
H. NOISE	
Construction	
On-Site Noise[2]	**Significant and Unavoidable**
Off-Site Noise	Less Than Significant
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)[3]	**Significant and Unavoidable**
Operation	Less Than Significant
I. PUBLIC SERVICES	
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Schools	
Construction	Less Than Significant
Operation	Less Than Significant
Parks and Recreation	
Construction	Less Than Significant
Operation	Less Than Significant

[2] *As discussed in Section IV.H, Noise, of this Draft EIR, cumulative impacts from on-site noise sources during construction would be significant and unavoidable.*

[3] *As discussed in Section IV.H, Noise, of this Draft EIR, cumulative vibration impacts from off-site construction with respect to human annoyance would be significant and unavoidable*

Table I-1 (Continued)
Summary of Impacts Under the Project

Environmental Issue	Proposed Project Impact
Libraries	
Construction	Less Than Significant
Operation	Less Than Significant
J. TRANSPORTATION/TRAFFIC	
Construction	Less Than Significant
Operation	
Intersection Levels of Service[4]	**Significant and Unavoidable**
Neighborhood Intrusion/Residential Street Segments	No Impact
Public Transit	Less Than Significant
Access and Circulation	Less Than Significant
Bicycle, Pedestrian, and Vehicular Safety	Less Than Significant
Parking	Less Than Significant
Regional Transportation System	Less Than Significant
K. TRIBAL CULTURAL RESOURCES	Less Than Significant with Mitigation
L. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Wastewater	
Construction	Less Than Significant
Operation	Less Than Significant
Solid Waste	
Construction	Less Than Significant
Operation	Less Than Significant
M. ENERGY CONSERVATION AND INFRASTRUCTURE	
Energy Use	Less Than Significant
Infrastructure Capacity	Less Than Significant

Source: Eyestone Environmental, 2019.

[4] *As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, cumulative impacts to intersection levels of service during operation would be significant and unavoidable.*

a. Less Than Significant

(1) Aesthetics

(a) Visual Character

(i) Construction

During construction activities for the Project, the visual character and quality of the Project Site and adjacent roadways would be altered due to the removal of the existing structures; site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures. Some of the construction activities would be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. However, the appearance of the Project Site during construction would be typical of construction sites in urban areas. In addition, in accordance with Project Design Feature AES-PDF-1, provided below, temporary construction fencing would be installed along the periphery of the Project Site to screen much of the construction activity from view at the street level. Also, as set forth in Project Design Feature AES-PDF-2, pedestrian walkways and construction fencing accessible to the public would be monitored for graffiti removal throughout the construction period. Additionally, all existing trees to be removed within the Project Site would be replaced in accordance with City requirements. The Project would also provide ample on-site landscaping to enhance the streetscape, including a landscaped public plaza and a landscaped pedestrian paseo that would extend north-south and east-west through the Project Site. As such, the removal of existing on-site trees during construction of the Project would not substantially or permanently alter or degrade the existing visual character of the Project area. Overall, impacts to the existing visual character and quality of the Project Site and its surroundings during construction of the Project would be less than significant.

(ii) Operation

The Project would visually alter the Project Site by removing the existing structures and associated surface parking areas and introducing a new mixed-use development that would be integrated by landscaped pedestrian walkways and landscaped pedestrian-oriented open space, creating a unified site. The Project Site does not include natural open space that would be graded or developed as a result of the Project.

Relative to the surrounding development, the aesthetic environment reflects a multitude of interspersed low-, mid-, and high rise structures with commercial and residential uses with more recent developments featuring a more contemporary design. The Project design complements the varying design elements of the multi-family residential and commercial uses adjacent to the Project Site. In particular, the Project would

incorporate design elements that would be similar to and compatible with the adjacent Stella apartment complex as well as the commercial uses across Maxella Avenue. In addition, the Project would incorporate stepbacks along Glencoe Avenue to provide a transition to the lower scale multi-family residential uses to the east of the Project Site. Additionally, proposed parking on-site would be designed to maximize efficiency and minimize visual impacts.

Similarly, the appearance of bulk and mass would be softened by building articulation, landscaping, and open space. As such, the Project's massing would not contrast sharply with existing surrounding development.

The Project's height would also be compatible with the existing character of the area by locating the proposed buildings and implementing appropriate design elements adjacent to existing buildings of similar scale. For example, the Project would incorporate stepbacks along Glencoe Avenue to provide a transition to the lower scale multi-family residential uses to the east of the Project Site.

Proposed signage would also contribute to the visual character of the Project Site and vicinity. The Project would incorporate signage consistent with the signage regulations of the LAMC, including the location of signs, size of signs, sign illumination, and types of signage. Signage along the street frontages would be of a proper scale to motorists and pedestrians. In addition, signage would be visually integrated with the proposed development on the Project Site and would further add visual interest and texture to building façades.

In summary, the Project's design, massing, and scale would be compatible with the existing uses that set the aesthetic character of the Project Site vicinity. Impacts to the existing visual character and quality of the Project Site and its surroundings during operation of the Project would be less than significant.

(iii) Shading

As discussed in detail in Section IV.A, Aesthetics, of this Draft EIR, the Project would not shade potentially routinely useable outdoor spaces associated with sensitive uses for more than the specified times during the winter, spring, summer, or fall. Therefore, shading impacts would be less than significant.

(b) Light and Glare

(i) Construction

To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. In addition, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as identified in Project Design Feature AES-PDF-3, below, construction lighting would be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. Construction lighting, while potentially bright, would be focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the construction site would not be anticipated to be substantially affected by construction lighting.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, the glare from vehicles that currently park on the Project Site would be similar or cause greater visual impacts than any temporary construction glare that may be generated during construction activities. Additionally, as set forth in Project Design Feature AES-PDF-1, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

In summary, construction activities associated with the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts from Project-related sources of artificial light and glare during construction would be less than significant.

(ii) Operation

The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area. All exterior lights would be directed toward the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. The stepped back design of the Project would further ensure that lighting on the upper levels and the podium is concentrated in the central portion of the building, and would provide space along the building edges to serve as a buffer for rooftop light spillover. Project lighting would also meet all applicable LAMC lighting standards.

Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

With regard to glare, the Project would be designed in a contemporary architectural style and would feature various surface materials. Building materials could include tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, and glass railings. As provided in Project Design Feature AES-PDF-8, below, the Project would use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking areas would be enclosed, which would eliminate the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night compared to existing conditions.

In summary, lighting and glare associated with Project operation would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Light and glare impacts during operation of the Project would be less than significant.

(2) Air Quality

(a) Applicable Air Quality Plans

(i) SCAQMD CEQA Air Quality Handbook Policy Analysis

The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. The Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project includes similar projections that form the basis of the 2016 AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP. Furthermore, the Project implements feasible air quality mitigation measures, which would reduce air quality impacts. Additionally, as the Project would support the City of Los Angeles and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP land use policies. Thus, the Project would not conflict with or obstruct implementation of the AQMP.

(ii) City of Los Angeles Polices

The Project would serve to implement applicable policies of the City of Los Angeles pertaining to air quality, including implementation of certain features that would serve to reduce vehicular trips, reduce VMT, and encourage use of alternative modes of transportation.

(b) Air Quality Standards

(i) Construction

As discussed in Section IV.B, Air Quality, of this Draft EIR, Project-related construction emissions would not exceed localized thresholds. Therefore, localized construction emissions resulting from the Project would result in a less-than-significant air quality impact.

(ii) Operation

As evaluated in Section IV.B, Air Quality, of this Draft EIR, Project-related operational emissions from on-site and off-site sources would not exceed regional or localized thresholds. Therefore, regional and localized operational emissions associated with the Project would result in a less-than-significant air quality impact.

(c) Contribution to Cumulative Emissions

As discussed in Section IV.B, Air Quality, of this Draft EIR, according to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. In terms of localized air quality impacts, construction of the Project would have a less-than-significant cumulative impact as impacts from NO_X, CO, PM_{10} and $PM_{2.5}$ emissions would be less than significant.

With regard to operation, operational emissions from the Project would not exceed any of the SCAQMD's localized significance thresholds at Project buildout. As such, the Project's contribution to cumulative regional and localized emissions would not be cumulatively considerable for operation.

(d) Pollutants and Toxic Air Contaminants

(i) Construction

As discussed in Section IV.B, Air Quality, of this Draft EIR, maximum localized construction emissions for off-site sensitive receptors would not exceed SCAQMD-recommended localized screening thresholds for NO_X, CO, PM_{10} and $PM_{2.5}$. Therefore,

localized construction emissions associated with the Project would result in a less than significant short-term impact. In addition, construction of the Project would not result in a substantial, long-term (i.e., 70-year) source of toxic air contaminant (TAC) emissions. Additionally, the SCAQMD CEQA guidance does not require a health-risk assessment for short-term construction emissions. It is, therefore, not necessary to evaluate long-term cancer impacts from construction activities which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. As such, Project-related TAC impacts during construction would be less than significant.

(ii) Operation

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. On-site operational emissions would not exceed any of the LSTs. Therefore, localized operational emissions associated with the Project would result in a less-than-significant air quality impact. In addition, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. Therefore, impacts related to localized mobile-source CO emissions are considered less than significant.

Additionally, the Project is not considered to be a substantial source of diesel particulate matter warranting a refined health risk assessment (HRA) since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

(3) Geology and Soils

(a) Surface Rupture

As evaluated in Section IV.D, Geology and Soils, of this Draft EIR, based on research of available literature and the findings of the Geotechnical Investigation, no known active or potentially active faults underlie the Project Site. In addition, the Project Site is not located within a state-designated Alquist-Priolo Earthquake Fault Zone. Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site, is considered low. Thus, the Project would not exacerbate existing environmental conditions or cause or accelerate geologic hazards related to fault rupture as no known active or potentially active faults underlie the Project Site which could result in

substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts associated with surface rupture from a known earthquake fault would be less than significant.

(b) Strong Seismic Ground Shaking

While, the Project Site is located within the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault, state and local building code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices, including the specific geotechnical design recommendations set forth for the Project in the Geotechnical Investigation. Through compliance with regulatory requirements, site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not exacerbate existing environmental conditions or cause or accelerate geologic hazards related to strong seismic ground shaking, which could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Thus, impacts related to strong seismic ground shaking would be less than significant.

(c) Soil Erosion/Loss of Topsoil

Construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. In addition, as discussed in detail in Section IV.F, Hydrology and Water Quality, of this Draft EIR, the Project would be required to have a Storm Water Pollution Prevention Plan (SWPPP) during construction pursuant to National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, Best Management Practices would be implemented during construction to reduce sedimentation and erosion levels. Once operational, the Project Site would be paved and landscaped. As such, the Project Site's underlying soils would not be exposed and there would be a limited potential for soil erosion to occur during operation of the Project. With compliance with regulatory requirements, the Project's impacts from soil erosion or the loss of topsoil would be less than significant.

(d) Subsidence

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. According to the Geotechnical Investigation, the Southern California Gas Company operates a natural gas field beneath Playa del Rey, located south of the Project Site. The natural gas storage area does not extend below the Project Site. Furthermore, as discussed in Section IV.F, Hydrology and Water Quality, of this Draft EIR, in the event groundwater is encountered during construction of the Project, temporary dewatering or other groundwater control methods could be required within the Project Site. However, if dewatering is required, it would not involve a large-scale extraction of groundwater. In addition, no large-scale extraction of gas, oil, or geothermal energy is occurring, or is planned at the Project Site. Therefore, there is little to no potential for significant ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the Project would not exacerbate, cause, or accelerate geologic hazards related to subsidence. Impacts related to subsidence would be less than significant.

(e) Collapsible Soils

According to the Geotechnical Investigation, due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. In addition, as discussed in Section IV.F, Hydrology and Water Quality, of this Draft EIR, the subterranean levels of the Project would be designed such that they are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. Therefore, the Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse cause in whole or in part by the Project's exacerbation of existing environmental conditions.

(f) Expansive Soils

As discussed in the Geotechnical Investigation, the alluvial soils on the Project Site have a low expansion potential. Therefore, the Project would not create substantial risks to life or property associated with expansive soils, and potential impacts related to expansive soils would not be exacerbated by the Project. Thus, impacts related to expansive soils would be less than significant.

(g) Landform Alteration

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or vicinity. Therefore, the Project would not destroy, permanently cover,

or materially and adversely modify any distinct and prominent geologic or topographic features. Impacts associated with landform alteration would not occur.

(4) Greenhouse Gas Emissions

As detailed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, when taking into consideration implementation of relevant project design features, as well as the requirements set forth in the City of Los Angeles Green Building Code, and full implementation of current State mandates, the Project's GHG emissions in 2023 would be 332 $MTCO_2e$ per year (amortized over 30 years) during construction and 5,859 $MTCO_2e$ per year during operation, for a combined total of 6,191 $MTCO_2e$ per year. The Project's location, land use characteristics and design render the Project consistent with statewide and regional climate change mandates, plans, policies, and recommendations, as well as with the City's Green Building Code and the LA Green Plan. As such, the Project would not conflict with any applicable plan, policy, regulation or recommendation adopted for the purpose of reducing the emissions of GHGs, and the Project's impact related to regulatory consistency would be less than significant.

(5) Hazards and Hazardous Materials

(a) Hazardous Materials Transport, Use, or Disposal

(i) Construction

During demolition, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be used, handled, and stored on the Project Site. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, there is limited potential for Project construction activities to expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard in excess of regulatory standards. The Project Site would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

(ii) Operation

Operation of the Project would use potentially hazardous materials typical of those used in residential and commercial uses. As with Project construction, all hazardous

materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and continued compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant and no mitigation measures are required.

(b) Release of Hazardous Materials

(i) Construction

Hazardous Waste Generation, Handling, and Disposal

During demolition, excavation, on-site grading and building construction, hazardous materials, such as fuel, and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used, and therefore, would require proper handling and management and, in some cases, disposal. In addition, the Phase I ESA identified a potential for groundwater contamination to exist on the Project Site. This contamination is a result of the elevated concentrations of PCBs, TCE, and PCE that were detected in the soils at the former property of Cornell-Dubilier Electronics Division located north-northwest of the Project Site.

Construction activities would occur in accordance with regulatory requirements, including specific Occupational Safety and Health Administration requirements regarding worker safety and use of hazardous materials. Similarly, ground disturbance associated with site clearance, excavation, and grading activities during construction would be required to comply with relevant and applicable federal, state, and local regulations and requirements. In addition, in the event dewatering is required during construction of the Project, any discharge of groundwater would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal methods. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction would be less than significant.

Underground and Aboveground Storage Tanks (USTs and ASTs)

According to the Phase I ESA, no evidence of existing USTs or ASTs was observed on the Project Site. In the unlikely event that USTs, underground facilities, buried debris, waste drums, tanks, and stained or odorous soils are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. In addition, compliance with applicable permitting, notification, and worker safety regulations and programs would ensure construction worker safety at and near sites with potential contamination. Adherence to these guidelines would serve to effectively avoid worker exposure to hazardous materials that may be encountered on-site during construction activities. Therefore, with compliance with applicable regulations, impacts related to the removal of USTs, ASTs, or other buried materials during demolition and building construction would be less than significant.

Asbestos-Containing Materials (ACMs)

Based on the age of the on-site buildings, ACMs may be present on-site. Thus, in accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by the City of Los Angeles Department of Building and Safety. In the event that ACMs are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, impacts related to the removal of ACMs during demolition would be less than significant.

Lead-Based Paint (LBP)

Based on the age of the on-site buildings, LBP may be present on-site. In the event that LBP is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. Therefore, impacts related to the removal of LBP during demolition would be less than significant.

Polychlorinated Biphenyls (PCBs)

Three vaulted transformers utilized by the Project Site, were observed on-site. No leaks or stains were observed on the ground beneath the transformers during the site reconnaissance. Therefore, the transformers are unlikely to represent an environmental concern. In the event that PCBs are found within areas proposed for demolition, suspect

materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, impacts related to the removal of PCBs during demolition would be less than significant.

Oil Wells and Methane Gas

While no oil wells or oil production facilities were identified on-site, the Project Site is located within a 2,000-foot radius of the Playa del Rey oil field, and previously unknown wells could be present. If previously unidentified wells are encountered during Project construction, an accidental release could occur or contaminated soil could be uncovered. Adherence to all applicable regulatory compliance measures would ensure impacts associated with previously unidentified oil wells or oil production facilities would be less than significant.

Grading or construction activities within portions of the Project Site that are designated as being within a Methane Buffer Zone and that involve work in confined spaces on-site could pose a potential for methane build-up, resulting in a possible hazardous condition. Adherence to the City of Los Angeles' Methane Mitigation Ordinance, construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to avoid substantial risk in the event that elevated levels of these soil gases are encountered during grading and construction. Based on such safety provisions and appropriate monitoring, grading and construction activities associated with development within a Methane Buffer Zone are not expected to substantially expose construction workers to elevated levels of methane or other soil gases. Additionally, the waterproofing membrane required by the Los Angels Department of Building and Safety to be installed during construction would be designed to be effective in reducing the potential for vapor intrusion associated with degassing of VOCs from potentially contaminated groundwater. The waterproofing membrane in conjunction with the ventilated garage space would eliminate the vapor intrusion potential at the Project Site. Thus, compliance with regulatory standards would reduce the chance of exposure of people to a substantial risk resulting from the release or explosion of an oil or methane gas, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with oil wells and methane gas during demolition and building construction would be less than significant.

(ii) Operation

Hazardous Waste Generation, Handling, and Disposal

Operation of the Project would involve the use of potentially hazardous materials typically used in residential and commercial uses, and for building and ground maintenance, including cleaning solvents, and pesticides for landscaping. As the proposed commercial operations would be similar to the type of operations occurring presently

on-site and adjacent to the Project Site, no substantial increases in the amount or type of operational hazardous wastes would be expected to occur with those uses or with the proposed Project uses. Activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with relevant regulations and requirements, operational activities would not expose people to a substantial risk resulting from hazardous waste, handling, and disposal. Thus, impacts associated with hazardous waste management during operation of the Project would be less than significant.

Underground and Aboveground Storage Tanks

The Project does not propose the installation of underground or aboveground storage tanks. As such, operation of the Project would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards associated with USTs or ASTs. Thus, impacts associated with underground and aboveground storage tanks during operation of the Project would be less than significant.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the Project would not expose people to substantial risk resulting from the release of, or exposure to, asbestos or asbestos containing materials. Thus, no impacts associated with asbestos or ACMs during operation of the Project would occur.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the Project would not expose people to LBP as no LBPs would be used. Thus, the Project would not expose people to substantial risk resulting from the release of, or exposure to, LBP. Impacts associated with LBP during operation of the Project would not occur.

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any

risk resulting from the release of PCBs in the environment. Therefore, no impacts related to PCBs during Project operation would occur.

Oil Wells and Methane Gas

Development of the Project includes residential, retail, and restaurant uses. The Project does not propose the development of oil wells. Therefore, impacts associated with oil wells during operation of the Project would be less than significant.

The Project Site is located within a Methane Buffer Zone and is categorized as a Level III Site Design under the City's Methane Mitigation Ordinance No. 175790. The permitting process would ensure that new development would comply with the City's Methane Mitigation Ordinance. As such, the Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, associated with the release of methane gas. Impacts associated with methane gas would be less than significant.

(c) Hazardous Materials Sites

Based on the database records search, the Project Site is listed on the California Hazardous Waste Information System (CA HAZNET), which includes facility and manifest data for sites that file hazardous waste manifests with the DTSC. The CA HAZNET database identifies the Project Site as being a hazardous waste generator between 1993 and 1995. Hazardous wastes reportedly generated on-site included asbestos-containing waste, organic liquid mixture, and organic solids with halogens. However, these hazardous wastes appear to have been attributed to remodeling activities that occurred on the Project Site during that time period. No violations were identified with respect to the hazardous waste listings. In addition, based on a lack of reported spills, leaks, or violations, this listing is not considered to represent a significant impact, and no mitigation measures are required.

(d) Impair Implementation of Adopted Emergency Response Plan

(i) Construction

According to the Safety Element of the City of Los Angeles General Plan, the Project Site is located in proximity to a designated disaster route along the Marina Expressway and Lincoln Boulevard. Construction activities for the Project would be primarily confined to the Project Site and would only include minor off-site work for installation of utility connections. In addition, pursuant to Project Design Feature TR-PDF-1, a Construction Traffic Management Plan would be implemented during construction of the Project to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also comply with all applicable codes and

ordinances for emergency access. Therefore, with adherence to regulatory requirements and implementation of a Construction Traffic Management Plan, construction of the Project would not be anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans. Impacts related to emergency response and evacuation during construction would be less than significant, and no mitigation measures are required.

(ii) Operation

During operation, the Project would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. Emergency vehicles would continue to access the Project Site directly from the surrounding roadways, including Glencoe Avenue and Maxella Avenue. In addition, the increase in traffic generated by the Project would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial effect on emergency response as a result of increased traffic congestion. As such, impacts associated with emergency response and emergency evacuation plans during operation of the Project would be less than significant.

(6) Hydrology and Water Quality

(a) Surface Water Quality

(i) Construction

Construction activities for the Project would include excavation with depths of 28 feet below ground surface. Based on geotechnical investigations adjacent to the Project Site, groundwater was encountered at 17 feet below ground surface. Therefore, the Project is expected to require dewatering during construction. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. During construction, temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific best management practices (BMPs) included as part of the SWPPP, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, the Project Applicant would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy

season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements. Thus, construction-related impacts on surface water quality would be less than significant.

(ii) Operation

Operation of the Project would introduce sources of potential water pollution that are typical of commercial developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains. The Project would implement BMPs for managing stormwater runoff in accordance with the current City of Los Angeles Low Impact Development (LID) Ordinance requirements. Given that there is one pretreatment BMP on-site that only provides partial treatment of stormwater runoff, additional BMP implementation associated with the Project would result in improved surface water quality of the receiving waters. The Project BMPs would control stormwater runoff with no increase in runoff resulting from the Project. Due to the incorporation of the LID BMPs, operation of the Project would not result in discharges that would violate any water quality standard or waste discharge requirements. Operational impacts to surface water quality would be less than significant.

(b) Groundwater Quality

(i) Construction

Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would also reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream. In addition, as there are no existing groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells. As such, construction of the Project would not result in discharge that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant.

(ii) Operation

The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, or a municipal supply well or spreading ground facility. The Project does not include surface or subsurface application or introduction of potential contaminants or waste materials during construction or operation. The Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than significant.

(c) Groundwater Hydrology

(i) Construction

Dewatering operations are expected during construction. In the event dewatering is required during Project construction, a temporary dewatering system would be installed and operated in accordance with General NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. In addition, if groundwater is encountered and is not contaminated, a portion of the extracted non-contaminated groundwater is proposed to be reused onsite for dust control, which would keep a portion of the dewatered groundwater on-site. Furthermore, no water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells. Thus, the Project would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or permanent lowering of the local groundwater table. Impacts on groundwater supplies during construction of the Project would be less than significant.

(ii) Operation

The Project Site is currently 96 percent impervious, and as such, minimal groundwater recharge takes place. The Project's increase in pervious area along with the proposed infiltration system would improve the groundwater recharge capacity of the Project Site compared to existing conditions. In addition, permanent dewatering operations are not expected. Therefore, the Project would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or permanent lowering of the local groundwater table. Impacts on groundwater supplies during operation of the Project would be less than significant.

(d) Surface Water Hydrology

(i) Construction

Construction activities for the Project would include excavation and the removal of soil. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, in accordance with the requirements of the NPDES Construction General Permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, construction of the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Construction-related impacts to hydrology would be less than significant.

(ii) Operation

The Project Site is developed with existing buildings and hardscape with approximately 96 percent impervious surfaces. The Project would include new buildings surrounded by hardscape and landscape and, upon buildout, the post-Project condition would be approximately 88 percent impervious. As such, the overall flow rate would be reduced compared to existing conditions. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Operational impacts to hydrology would be less than significant.

(e) Stormwater Infrastructure

As provided in detail in Section IV.F, Hydrology and Water Quality, of this Draft EIR, a comparison of the pre- and post-peak flow rates indicates a slight decrease in stormwater runoff from the Project Site. In addition, the street capacity calculations for both Glencoe Avenue and Maxella Avenue determined that both roadways can handle the proposed 10-year flows associated with the Project, along with street flows already in the roadways. As such, the Project would not impact existing storm drain infrastructure serving the Project Site and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, the Project would not create runoff which would exceed the capacity of existing or planned drainage systems, and potential impacts would be less than significant.

(7) Land Use

As detailed in Section IV.G, Land Use, of this Draft EIR, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. In particular, the proposed Vesting Zone Change to change the zoning from [Q]M1-1 to (T)(Q)C2-2D would permit a residential density in accordance with the R4 Zone (400 square feet per unit), which would allow the proposed 658 multi-family units. Therefore, the proposed multi-family use as part of the Project would be permitted with approval of the General Plan Amendment and Vesting Zone Change. It is also noted that the residential and neighborhood-serving commercial uses proposed by the Project would be consistent with the uses in the Palms–Mar Vista–Del Rey Community Plan area and the residential and commercial uses immediately adjacent to the Project Site. Therefore, the Project would not conflict with or impede either the General Plan or Community Plan, or the whole of relevant environmental policies in other applicable plans. As such, impacts related to land use consistency would be less than significant.

(8) Noise

(a) Off-Site Construction Noise

As discussed in Section IV.H, Noise, of this Draft EIR, the Project's temporary noise impacts from off-site construction traffic would be less than significant at all off-site sensitive receptors. Therefore, the Project's off-site construction activities would not result in the exposure of persons to or generation of noise levels in excess of standards established by the City, and impacts would be less than significant.

(b) Operational Noise

As discussed in Section IV.H, Noise, of this Draft EIR, the Project would include on-site stationary noise sources (i.e., mechanical equipment, outdoor spaces, parking facilities, and loading dock and trash collection areas) and off-site mobile noise sources (i.e., roadway traffic). Noise impacts from on-site stationary noise sources as well as from off-site mobile noise sources would be less than significant. Composite noise level impacts due to Project operations would also be less than significant. As such, the Project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the Project Site above existing levels without the Project. In sum, Project operations would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and operational noise impacts would be less than significant.

(c) Vibration

As discussed in Section IV.H, Noise, of this Draft EIR, vibration impacts from on-site and off-site construction activities with respect to the significance criteria for building damage would be less than significant.

(9) Public Services—Fire Protection

(a) Construction

As discussed in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, Project construction would not require a new fire station or the expansion of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service. Therefore, impacts to fire protection services during Project construction would be less than significant.

(b) Operation

As discussed in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, compliance with applicable regulatory requirements that are enforced through the City's building permitting process would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. As such, impacts with regard to LAFD facilities and equipment would be less than significant. In addition, Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area, and impacts with regard to response distance and emergency access would be less than significant. Furthermore, in compliance with LAMC Section 57.507.3.1, the LAFD has determined that the existing public water system would meet fire flow requirements without the installation of additional fire hydrants, and related impacts would be less than significant. As such, Project operation would not require a new fire station or the expansion of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service. Therefore, impacts to fire protection during Project operation would be less than significant.

(10) Public Services—Police Protection

(a) Construction

As discussed in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, with implementation of project design features and compliance with state law, temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site, nor would construction of the Project significantly impact

emergency response as a result of construction traffic. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's capability to serve the Project Site. Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

As discussed in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. Furthermore, the Project would not significantly affect emergency response as a result of traffic congestion attributable to the Project. Additionally, the LAPD has determined that the Project, due to its size, would have a moderate (or average) impact on police protection services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable police protection services. Impacts on police protection services during operation of the Project would be less than significant.

(11) Public Services—Schools

(a) Construction

As discussed in Section IV.I.3, Public Services—Schools, of this Draft EIR, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts to school facilities during Project construction would be less than significant.

(b) Operation

As discussed in Section IV.I.3, Public Services—Schools, of this Draft EIR, the Project would directly generate students through the construction of 658 new residential dwelling units. In addition, the Project's commercial retail component would generate students as employees of the commercial uses may relocate to the Project Site vicinity. The result, after removal of existing uses, would be the net increase of 230 students (125 elementary, 34 middle school and 71 high school students). With regard to projected future capacity, Short Avenue Elementary School would have a seating shortage of 248 students, Marina Del Rey Middle School would have a seating shortage of 339 students, and Venice Senior High would have a seating shortage of 669 students. Pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the

applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. Accordingly, with adherence to existing regulations, impacts on schools would be less than significant.

(12) Public Services—Parks and Recreation

(a) Impacts of Existing Facilities

(i) Construction

As discussed in Section IV.I.4, Public Services—Parks and Recreation, of this Draft EIR, construction of the Project would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would construction of the Project interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site. Therefore, construction of the Project would not increase the use of existing parks or recreational facilities such that substantial physical deterioration of the facility would occur nor would the Project require new or expanded parks or recreational facilities which might have an adverse physical effect on the environment. Impacts on parks and recreational facilities during construction of the Project would be less than significant.

(ii) Operation

While the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, while the Project's commercial component could result in a demand for parks and recreational facilities, the Project also includes common open space areas throughout the Project Site, some of which would be publicly accessible and available for use by other users of the Project Site. Furthermore, the Project would pay in lieu fees in accordance with Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act. Overall, operation of the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of the facility would occur nor would the Project require new or expanded parks or recreational facilities which might have an adverse physical effect on the environment.

(b) Regulatory Framework

As discussed in Section IV.I.4, Public Services—Parks and Recreation, of this Draft EIR, compliance with regulatory requirements would ensure that the intent of the Public

Recreation Plan's parkland guidelines would be addressed through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. As such, in compliance with LAMC requirements, the Project would provide open space and landscaped areas for visitors and residents. In addition, the Project would comply with requirements to satisfy park and recreational uses for residential subdivisions through parkland dedication, payment of in-lieu fees, and/or provision of on-site open space, subject to determination by the City. In addition, the Project would not conflict with parks and recreation polices of the Palms–Mar Vista–Del Rey Community Plan. Therefore, impacts related to the regulatory framework would be less than significant.

(13) Public Services—Libraries

(a) Construction

As discussed in Section IV.I.5, Public Services—Libraries, of this Draft EIR, the Los Angeles Public Library (LAPL) identified the following libraries within the 2-mile libraries service area of the Project: Venice Branch Library, Mar Vista Branch Library, and Playa Vista Branch Library. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. As such, Project construction would not result in the need for new or physically altered libraries, the construction of which would cause significant environmental impacts. Impacts on library facilities during Project construction would be less than significant.

(b) Operation

As discussed in Section IV.I.5, Public Services—Libraries, of this Draft EIR, Project operation would not result in the need for new or expanded facilities, or substantially increase the demand for library services for which current and future demand exceeds the ability of the facility to adequately serve the population. Therefore, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant.

(14) Transportation/Traffic

(a) Conflict with Applicable Plan Regarding the Performance of Circulation System

(i) Construction

Temporary Traffic Impacts

As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, construction of the Project would generate fewer trips compared to the existing uses on the Project Site. As such, the Project would not cause substantial delays and disruption of existing traffic flow, and construction traffic impacts associated with the Project would be less than significant.

Temporary Loss of Access

The construction of the Project would not require the closure of any vehicle travel lanes. There may be limited instances, lasting a few hours per occurrence, during the course of construction of the Project, such as utility work within the street on Glencoe Avenue and/or Maxella Avenue, that require the use of traffic control devices, such as traffic safety cones, to slightly modify vehicular traffic flow and/or the use of flaggers to maintain two-way traffic flow on these streets. This work would be temporary in nature (e.g., during daytime hours over the course of one or a few days) and would be coordinated under review and approval with the appropriate City agencies, as needed. Temporary closures of the sidewalks adjacent to the Project Site on Glencoe Avenue and Maxella Avenue may also be required during portions of the construction period. As such, the use of the public right-of-way along Glencoe Avenue and Maxella Avenue would require temporary rerouting of pedestrian traffic that could result in the temporary loss of access to sidewalks surrounding the Project Site boundary. As set forth in Project Design Feature TR-PDF-1, the Project Applicant would prepare and submit a Worksite Traffic Control Plan to LADOT prior to the start of construction, which would identify the location of any temporary street parking or sidewalk closures, provide for the posting of signs advising pedestrians of temporary sidewalk closures and provide alternative routes, provide for the installation of other construction-related warning signs, and show access to abutting properties. Therefore, access and safety impacts during construction of the Project would be less than significant.

Temporary Loss of Bus Stops

The use of the public right-of-way along Maxella Avenue adjacent to the Project Site would require the temporary relocation of bus stops. Coordination with public transit agencies to provide advance notification of bus stop relocations and durations would be required as part of the Construction Traffic Management Plan and Worksite Traffic Control

Plan pursuant to Project Design Feature TR-PDF-1. Therefore, Project construction would not result in changes to bus and/or transit service such that a substantial inconvenience to riders would occur. Temporary impacts to bus and/or transit service would be less than significant.

Temporary Loss of On-Street Parking

Street parking by construction workers would not be permitted. However, street parking spaces adjacent to the Project Site on Glencoe Avenue could potentially be reserved for use by construction vehicles for the duration of construction. As these street parking spaces are likely associated with the existing uses on the Project Site (which would be removed as part of the Project), the temporary unavailability of these street parking spaces is not expected to cause an adverse effect to other nearby businesses. Furthermore, as set forth in Project Design Feature TR-PDF-1, during construction of the Project, adequate parking for construction workers would be provided either on-site or at off-site, off-street locations, which would minimize the on-street parking demand associated with Project construction. Therefore, impacts to on-street parking during construction of the Project would be less than significant.

(ii) Operation

Public Transit

Public transit service within the study area is currently provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. Currently, 13 bus lines provide transit service in the vicinity of the Project Site. As summarized in Table A of the Traffic Study included in Appendix M of this Draft EIR, the 13 bus lines serving the Project Site have a total combined capacity of approximately 5,775 riders during the A.M. peak hour and approximately 5,350 riders during the P.M. peak hour. As evaluated in the Transportation Study, the Project is forecasted to generate a demand for 102 daily transit rider trips. These transit riders would be distributed among the 13 bus lines serving the study area. Thus, given the capacity of the transit system serving the Project Site and the number of lines serving the Project Site vicinity, the forecasted transit trips generated by the Project would correspond to an immaterial number of additional Project generated transit trips per bus. Therefore, Project impacts to the existing transit system in the study area would be less than significant.

Access and Circulation

Vehicular access to the Project Site would be provided via five driveways, including two entry/exit driveways along Ocean Way, one entry/exit driveway along Maxella Avenue, one entry/exit driveway along Glencoe Avenue, and one entry/exit driveway located along the southern boundary of the Project Site. The Project Applicant may consider an

alternative site access plan whereby the currently proposed driveway on Maxella Avenue west of Glencoe Avenue would not be developed. The number of driveways serving the Project Site would be reduced from five driveways to four driveways. Vehicular access would remain unchanged at the other locations throughout the Project Site. None of the intersections nearest the primary site access are projected to operate at LOS E or F during the A.M. or P.M. peak hours under Future with Project conditions. In addition, as set forth in Project Design Feature TR-PDF-2, the two entry/exit driveways along Ocean Way would be controlled by a traffic signal, subject to approval by LADOT, and thus, would improve traffic impacts under the Future with Project Conditions. Overall, Project operational impacts with regard to access and circulation under the proposed access plan and the alternative site access plan would be less than significant.

Bicycle, Pedestrian, and Vehicular Safety

As provided in Project Design Feature TR-PDF-2, the Project would relocate the existing traffic signal on Maxella Avenue at the crosswalk approximately 100 feet to the west of the Ocean Way intersection such that all movements (vehicular, pedestrian, and bicycle) would be controlled by a traffic signal, subject to LADOT approval. The crosswalk at this traffic signal would provide a direct connection to the commercial uses on the north side of Maxella Avenue (i.e., Marina Marketplace shopping center). Thus, the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. The Project's access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed driveways would be designed to limit potential impediments to visibility and incorporate pedestrian warning systems, if and to the extent necessary. The Project would also maintain existing sidewalks and provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. As the Project would maintain the existing sidewalks and circulation system, the Project would not disrupt bicycle flow along Lincoln Boulevard, Maxella Avenue, and Glencoe Avenue. In addition, to facilitate bicycle use, bicycle parking spaces and amenities would be provided within the Project Site in accordance with LAMC requirements. As such, impacts related to bicycle, pedestrian, and vehicular safety would be less than significant.

Parking

Based on the parking requirements for residential and commercial (retail/restaurant) uses set forth in LAMC Sections 12.21.A.4.(a), 12.21 A.4.(c)(3), and 12.21 A.4.(c)(5), the Project would be required to provide a total of 1,217 parking spaces. As described in Section II, Project Description, of this Draft EIR, the Project would provide a total of 1,217 parking spaces, and, therefore, would comply with the applicable parking

requirements of the LAMC. As such, impacts related to parking would be less than significant.

Based on Section 12.21-A.16(a) of the LAMC, the Project is required to and would provide a minimum of 752 bicycle parking spaces, including 80 short-term and 672 long-term bicycle parking spaces. Therefore, the Project would comply with the applicable bicycle parking requirements of the LAMC, and bicycle parking impacts would be less than significant.

(b) Conflict with Applicable Congestion Management Program

(i) CMP Freeway Segment Analysis

The closest CMP mainline freeway monitoring location is located on San Diego Freeway (I-405) north of Venice Boulevard, approximately 2.1 miles northeast of the Project Site. The Project would not add 150 or more trips (in either direction) during either the A.M. or P.M. peak hour at the freeway monitoring location nearest to the Project Site. Therefore, Project impacts to a CMP mainline freeway monitoring location would be less than significant.

(ii) CMP Arterial Monitoring Station Analysis

The nearest CMP arterial monitoring station is located on Lincoln Boulevard and SR-90, approximately 310 feet south of the Project Site. A second arterial CMP monitoring station is located on Lincoln Boulevard and Venice Boulevard, approximately 0.83 mile northwest of the Project Site. A third arterial CMP monitoring station is located on Venice Boulevard and Centinela Boulevard, approximately 1.2 miles northeast of the Project Site. The Project would not add 50 or more trips during the A.M. or P.M. peak hours at any of the CMP monitoring locations. Therefore, Project impacts to a CMP arterial monitoring station would be less than significant.

(iii) CMP Transit Analysis

Pursuant to the CMP guidelines, the Project is forecasted to generate a demand for 15 transit trips during the A.M. peak hour and five transit trips during the P.M. peak-hour. Over a 24-hour period, the Project is forecasted to generate a demand for 102 daily transit trips. As discussed above, 13 bus lines are provided adjacent to or in close proximity to the Project Site and provide services for an average of 105 buses during the A.M. peak hour and 97 buses during the P.M. peak-hour. Therefore, the forecasted transit trips generated by the Project would correspond to an insignificant number of additional Project generated transit trips per bus. As such, the existing transit service in the Project area would adequately accommodate the increase of Project-generated transit trips.

(c) Emergency Access

(i) Construction Impacts

Construction of the Project would not require the closure of any vehicle travel lanes. This is due primarily to the availability of parking "lanes" adjacent to the Project Site on Glencoe Avenue, which precludes the need to use the adjacent travel lanes. There may be limited instances, lasting a few hours per occurrence, during the course of construction of the Project, such as utility work within the street on Glencoe Avenue and/or Maxella Avenue, that require the use of traffic control devices to slightly modify vehicular traffic flow and/or the use of flaggers to maintain two-way traffic flow on these streets. This work would be temporary in nature and would be coordinated under review and approval with the appropriate City agencies, as needed. Additionally, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. It is also noted that construction of the Project would generate significantly fewer trips than the existing uses on the Project Site, thereby offsetting construction-related trips for development of the Project. Furthermore, the proposed Worksite Traffic Control Plan would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.

(ii) Operational Impacts

Vehicular access to the Project Site is proposed to be provided via five driveways, including two entry/exit driveways along Ocean Way, one entry/exit driveway along Maxella Avenue, one entry/exit driveway along Glencoe Avenue, and one entry/exit driveway located along the southern boundary of the Project Site. The Project Applicant may also consider an alternative site access plan whereby the currently proposed driveway on Maxella Avenue west of Glencoe Avenue would not be developed. In this alternative site access plan, the number of driveways serving the Project Site would be reduced from five driveways to four driveways. Vehicular access would remain unchanged at the other proposed locations throughout the Project Site. Under either access plan, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, under either access plan, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project. Additionally,

pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, impacts regarding adequate emergency access would be less than significant.

(d) Conflict with Adopted Plans Regarding Public Transit, Bicycle, or Pedestrian Facilities

Section IV.G, Land Use, of this Draft EIR, includes a detailed discussion regarding the Project's consistency with applicable land use plans, policies, and regulations. As it relates to public transit, bicycle, and pedestrian facilities, a number of land use plans include goals, objectives, and policies aimed at improving such facilities throughout the City. In particular, Policy 2.3 of Mobility Plan 2035 provides that walking be recognized as a component of every trip, and ensure quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment. The Project would promote this policy by implementing a pedestrian paseo that would bisect the Project Site north-south and east-west. This interlinking walkway would provide end-to-end pedestrian access through the Project Site and would include ground-level plazas and squares for gathering, outdoor dining spaces, and bicycle parking racks. This paseo would also provide direct connections to the surrounding streets, including Maxella Avenue and Glencoe Avenue, providing easy pedestrian access to and through the Project Site. The Project would further support Policy 3.4 of Mobility Plan 2035 to provide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services by designing the Project to be transit-friendly. Based on the detailed analysis included in Section IV.G, Land Use, of this Draft EIR, the Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, including goals, objectives, and policies of the City's Mobility Plan 2035, or otherwise decrease the performance or safety of such facilities. Therefore, impacts would be less than significant.

(15) Tribal Cultural Resources

No pre-historic archaeological sites, or other resources documented to be related to past Native American activity, have been previously identified within the Project Site. South Central Coastal Information Center records indicate a total of five previously recorded cultural resources fall within the 0.5-mile records search buffer around the Project Site. These include three historic-era buildings or structures, one historic era trash midden, and one prehistoric site (P-19-000047, the Sa'anga). P-19-000047, identified as the village of Sa'anga, is located approximately 750 feet from the Project Site and reportedly included human burials and had a rich subsurface deposit with cultural material indicative of habitation and tool manufacture. P-19-000047 is a listed Historic-Cultural Monument (HCM-490). The resource is considered to meet the criteria for HCM designation, having yielded, or may be likely to yield, information important in prehistory or history. However, none of the five previously recorded cultural resources that fall within the 0.5-mile records

search buffer around the Project Site, including P-19-000047, are located on the Project Site. As such, the Project Site is not 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), and the Project would not cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register or in a local register. As such, impacts to such resources would be less than significant.

(16) Utilities and Service Systems—Water Supply and Infrastructure

(a) Water Infrastructure

As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, construction activities associated with the Project would not require or result in the construction of new water facilities or expansion of existing facilities. Water distribution capacity would also be adequate to serve the Project. Furthermore, off-site construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or inconvenience to motorists or pedestrians. As such, construction-related impacts to water infrastructure would be less than significant.

In addition, based on consultation with the Los Angeles Department of Water and Power, no additional fire hydrants would be required to provide adequate fire coverage. Thus, with construction of the proposed fire water system improvements (connections to the existing water mains), the Project would meet the fire flow requirements. As such, related impacts would also be less than significant. Accordingly, the Project would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The water distribution capacity would be adequate to serve the Project. Therefore, the Project's impacts on water infrastructure would be less than significant.

(b) Water Supply

As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction would be met by the City's available supplies during each year of Project construction. In addition, the Project's operational net water demand has been accounted for in the City's overall total demand projections set forth in LADWP's 2015 UWMP. Specifically, as concluded by LADWP in the Water Supply Assessment prepared for the Project, the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 Urban Water Management Plan would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2040. The Project would also

implement sustainable design features related to water conservation to reduce the Project's net increase in water demand by at least 20 percent pursuant to the requirements of the City of Los Angeles Green Building Code. As such, the estimated water demand for the Project would not exceed the available supplies projected by LADWP, and the LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. Thus, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site and would have sufficient water supplies available to serve the Project from existing entitlements and resources. Therefore, Project impacts on water supply would be less than significant.

(17) Utilities and Service Systems—Wastewater

(a) Wastewater Treatment Requirements

As is the case under existing conditions, wastewater generated during operation of the Project would be collected and discharged into existing sewer mains and conveyed to the Hyperion Water Reclamation Plant in Playa del Rey. The discharge from the Hyperion Water Reclamation Plant into Santa Monica Bay is regulated by the Hyperion Water Reclamation Plant's National Pollutant Discharge Elimination System Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use. Accordingly, the Hyperion Water Reclamation Plant's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed water quality standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay. The wastewater generated by the Project would be typical of residential and commercial uses. No industrial discharge into the wastewater system would occur as part of the Project as no such uses are proposed. As the Hyperion Water Reclamation Plant is in compliance with the State's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board. Therefore, the Project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, and impacts would be less than significant.

(b) Wastewater Treatment Facilities and Capacity

(i) Construction

Wastewater generation during construction of the Project would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. In addition, wastewater generated during construction would be offset by the existing retail and restaurant uses to be removed. Furthermore, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to

the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows.

The Project would require construction of new on-site infrastructure to serve new buildings, and potential upgrades and/or relocations of existing infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to the public infrastructure. Installation of wastewater infrastructure would be limited to the on-site wastewater distribution, and minor off-site work associated with connections to the public main. As set for in Project Design Feature TR-PDF-1 included in Section IV.J, Transportation/Traffic, of this Draft EIR, the Construction Traffic Management Plan would ensure safe pedestrian and vehicle access throughout the construction period, and impacts resulting from the installation of any required wastewater infrastructure would be less than significant.

(ii) Operation

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant. The Project's increase in average daily wastewater flow of 75,555 gallons per day would represent approximately 0.04 percent of the current 175 million gallons per day remaining available capacity of the Hyperion Water Reclamation Plant and 0.01 percent of the Hyperion Service Area's estimated future design capacity of 550 million gallons per day. In addition, when accounting for existing flows within the Hyperion Service Area plus the 75,555 gallons associated with the Project, only 61.5 percent of the Hyperion Service Area's capacity would be utilized in 2023, the projected buildout year of the Project. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts would be less than significant.

(18) Utilities and Service Systems—Solid Waste

(a) Construction

As discussed in Section IV.L.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris, pursuant to the requirements of SB 1374 and Project Design Feature SW-PDF-1. Conservatively assuming a diversion rate of 75 percent, the Project would dispose of approximately 3,455 tons of construction-related waste in the County's inert landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.006 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity. Thus, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-

related waste. Therefore, construction impacts to solid waste facilities would be less than significant.

(b) Operation

Pursuant to the City's Solid Waste Management Policy Plan as directed by AB 939, operation of the Project would result in a 657 tons per year net increase in solid waste disposal, conservatively assuming a minimum diversion rate of approximately 50 percent. This net increase in solid waste disposal associated with the Project would represent a 0.03-percent increase in the City's annual solid waste disposal quantity. The Project would not conflict with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its updates, City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles General Plan Framework Element or the Curbside Recycling Program, or the County Integrated Waste Management Plan, including the most recent Annual Report. Therefore, Project-level impacts with regard to solid waste would be less than significant during operation.

(19) Energy Conservation and Infrastructure

(a) Significance Threshold No. 1: Would the Project cause wasteful, inefficient, and unnecessary use of energy?

As discussed in Section IV.M, Energy Conservation and Infrastructure, of this Draft EIR, the Project would not cause wasteful, inefficient, and unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. During operations, the Project would comply with existing energy efficiency requirements such as CalGreen. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use under Significance Threshold No. 1 would be less than significant during construction and operation.

(b) Significance Threshold No. 2: Would the Project result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As discussed in Section IV.M, Energy Conservation and Infrastructure, of this Draft EIR, construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, Project impacts related to energy infrastructure capacity would be less than significant during construction and operation.

b. Less Than Significant with Mitigation

(1) Geology and Soils—Liquefaction and Lateral Spreading

As discussed in Section IV.C, Geology and Soils, of this Draft EIR, according to the State of California Seismic Hazard Zones Map for the Venice Quadrangle, the Project Site is located within an area susceptible to liquefaction. The City's Safety Element also classifies the Project Site as part of an area that is susceptible to liquefaction. Furthermore, the City's Zoning Information and Map Access System indicates that the Project Site is located in an area that has been identified by the State as being potentially susceptible to liquefaction.

According to the Geotechnical Investigation, liquefaction is likely to occur at the Project Site in thin layers/lenses generally below 20 feet below ground surface. As discussed in Section II, Project Description, of this Draft EIR, the Project includes two subterranean parking levels that would extend to a depth of approximately 28 feet below ground surface. Therefore, as part of the construction of the subterranean parking levels, the liquefiable soil layers above the floor of the subterranean parking (i.e., approximately 28 feet below ground surface) would be removed during excavation. As such, the liquefaction potential within the Project Site would be addressed during construction of the Project.

Liquefaction-related effects include sand boils, excessive settlement, bearing capacity failures, and lateral spreading. As provided in the Geotechnical Investigation, the potential for liquefaction-related settlement would be addressed through the installation of mat foundations, as set forth in Mitigation Measure GEO-MM-1, below. With regard to lateral spreading, in order for lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area, such as an unlined river channel. As described in Section II, Project Description, of this Draft EIR, the Project Site is located in an urbanized area. In addition, the Project Site is relatively flat with a grade sloping to the south and east toward other existing developments. Furthermore, with the removal of the liquefiable soils and installation of mat foundations, the potential for liquefaction-related lateral spreading to occur within the Project Site would be addressed.

The Project would also be required to comply with the permitting requirements of the LADBS, including the recommendations provided in a final design-level geotechnical report, as set forth in Mitigation Measure GEO-MM-1. The state and City also mandate compliance with numerous rules related to seismic safety. Pursuant to those laws, and the mitigation measures proposed in this Draft EIR, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for the construction of the Project.

Overall, through compliance with regulatory requirements, site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, and implementation of the mitigation measures provided below, the Project would not exacerbate existing environmental conditions or cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. As such, with the implementation of Mitigation Measure GEO-MM-1, impacts associated with liquefaction and lateral spreading would be reduced to a less than significant level.

(2) Tribal Cultural Resources

As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, the results of the records searches (i.e., South Central Coastal Information Center and Native American Heritage Commission) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site and vicinity included in the Tribal Cultural Resources Report prepared for the Project demonstrate that while a large shell midden (P-19-000047, the Sa'anga) has been recorded approximately 750 feet from the Project Site, no known tribal cultural resources have been identified within the Project Site. However, in consideration of the known sensitivity of the surrounding area regarding cultural resources and due to the proximity of the Project Site to the Sa'anga, Mitigation Measure TCR-MM-1 is included to provide for periodic archaeological and Native American monitoring. Implementation of Mitigation Measure TCR-MM-1 would reduce potential impacts to tribal cultural resources to a less than significant level.

c. Significant and Unavoidable

(1) Air Quality

As presented in Section IV.B, Air Quality, of this Draft EIR, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the SCAQMD daily significance thresholds for VOC, CO, SO_X, PM_{10} and $PM_{2.5}$. However, maximum construction emissions would exceed the SCAQMD daily NO_X significance threshold. Therefore, regional construction emissions resulting from the

Project would result in a significant short-term impact. Implementation of mitigation measures would not reduce impacts to a less than significant level. Thus, the Project's construction-related regional construction emissions impacts would be significant and unavoidable. Cumulative impacts related to regional construction emissions would also be significant and unavoidable.

(2) Noise

As discussed in Section IV.H, Noise, of this Draft EIR, noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project Site. It is estimated that the noise level associated with Project construction activities would exceed the significance threshold at all off-site receptor locations, from 6.3 dBA at receptor R4 to 19.0 dBA at receptor R2. Implementation of Mitigation Measure NOI-MM-1, which would require the installation of temporary sound barriers, would reduce the noise generated by on-site construction activities at receptor R3 by 7 dBA and at receptor R4 by 11 dBA. As detailed in Section IV.H, Noise, of this Draft EIR, the potential impacts associated with on-site construction activities would be reduced to less than significant levels at receptors R3 and R4. However, the temporary sound barriers specified for receptors R1 and R2 would not be effective in reducing the construction-related noise for the upper levels of the residential and hotel uses at receptors R1 and R2. In order to be effective, the temporary noise barrier would need to be as high as the buildings (i.e., 6-stories and 5-stories for receptors R1 and R2, respectively). The construction of barriers of these heights would not be feasible. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction at receptors R1 and R2. As such, construction noise impacts associated with on-site noise sources would be significant and unavoidable.

As discussed in Section IV.H, Noise, of this Draft EIR, the estimated ground-borne vibration levels from on-site construction equipment would be below the significance criteria for human annoyance at all off-site receptor locations, with the exception of receptor R1. The estimated on-site vibration level of 78 VdB at receptor R1 would exceed the significance criteria of 72 VdB. Therefore, on-site vibration impacts during construction of the Project would be significant with respect to annoyance. Additionally, the temporary vibration levels from trucks traveling along the proposed haul route could reach approximately 75 VdB periodically as trucks pass by the residences along Maxella Avenue, and would exceed the 72 VdB significance criteria for residential uses. Therefore, potential off-site vibration impacts with respect to human annoyance that could result from temporary and intermittent vibration from construction trucks traveling along the anticipated haul route could be significant. As detailed in Section IV.H, Noise, of this Draft EIR, there are no feasible mitigation measures to reduce these impacts to a less-than-significant level. As such, the Project's vibration impacts due to on-site and off-site construction activities would be significant and unavoidable.

(3) Transportation/Traffic

As detailed in Section IV.J, Transportation/Traffic, of this Draft EIR, under Existing with Project and Future with Project Conditions, the Project would result in significant impacts to Intersection No. 17 (Mindanao Way/SR-90 EB Ramps). Mitigation Measure TR-MM-1 would reduce the significant traffic impact at Intersection No. 17 (Mindanao Way/ SR-90 EB Ramps) to a less-than-significant level. However, SR-90 is under the jurisdiction of Caltrans. As the City of Los Angeles does not have direct control over the operation of Intersection No. 17 (Mindanao Way/SR-90 EB Ramps), it cannot guarantee that Caltrans would agree to implement Mitigation Measure TR-MM-1. If Mitigation Measure TR-MM-1 was not implemented, a significant and unavoidable impact would remain at Intersection No. 17 (Mindanao Way/SR-90 EB Ramps) under Existing with Project and Future with Project Conditions. As it is not known at this point if Caltrans will approve implementation of Mitigation Measure TR-MM-1, the Project's impacts at Intersection No. 17 (Mindanao Way/SR-90 EB Ramps) are conservatively considered significant and unavoidable.

With regard to those study intersections located within or shared with the County of Los Angeles, under Future with Project Conditions, significant impacts are forecasted at Intersection No. 10 (Lincoln Boulevard/Mindanao Way) and Intersection No. 11 (Lincoln Boulevard/Fiji Way). As the two County intersections are built-out and additional improvements may not be implemented, the potential impacts are deemed to be significant and unavoidable at Intersection No. 10 (Lincoln Boulevard/Mindanao Way) and Intersection No. 11 (Lincoln Boulevard/Fiji Way).

11. Project Design Features

a. Aesthetics

Project Design Feature AES-PDF-1: Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity from view at the street level.

Project Design Feature AES-PDF-2: The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

Project Design Feature AES-PDF-3: Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent residential properties, the public right-of-way, or from the

above. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

Project Design Feature AES-PDF-4: New on-site utilities that may be required to serve the Project will be installed underground.

Project Design Feature AES-PDF-5: Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances, will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way.

Project Design Feature AES-PDF-6: All new outdoor lighting required for the Project shall be shielded and directed toward the interior of the Project Site such that the light source does not project directly upon any adjacent property.

Project Design Feature AES-PDF-7: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

b. Air Quality

Project Design Feature AIR-PDF-1: During plan check, the Project representative shall make available to the lead agency and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of construction for the Project. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet the Tier 3 standards.

c. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: Buildings shall be designed and constructed to incorporate environmentally sustainable design features equivalent

to a minimum Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction.

Project Design Feature GHG-PDF-2: The Project shall prohibit the installation of natural gas-powered hearths (fireplaces) in all residential units.

Project Design Feature GHG-PDF-3: The Project Applicant shall provide at least 20 percent of the total code-required parking spaces, but in no case less than one location, capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles (EVs) at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Project Design Feature GHG-PDF-4: At least 5 percent of the total code-required parking spaces shall be further equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.

d. Noise

Project Design Feature NOI-PDF-1: Project construction will not include the use of driven (impact) pile systems.

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment will be enclosed or screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-3: Loading and trash collection areas will be enclosed or screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-4: Outdoor amplified sound systems (e.g., speaker and stereo systems, amplification systems, or other sound-producing devices) will be designed as follows:

(i) Ground level retail and pedestrian plazas: maximum 75 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet from the amplified sound systems;

(ii) Ground level outdoor dining areas (patios), community park, and the roof decks at Buildings 1, 2 and 3: maximum 80 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet from the amplified sound systems; and

(iii) Podium level courtyards (pool deck) at Buildings 1, 2 and 3: maximum 90 dBA (L_{eq-1hr}) at a distance of 25 feet for the amplified sound systems.

A qualified noise consultant will provide written documentation that the design of the system complies with these maximum noise levels.

e. Public Services—Police Protection

Project Design Feature POL-PDF-1: During construction, the Applicant shall implement temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the contractor shall document the security measures and the documentation shall be made available to the construction monitor.

Project Design Feature POL-PDF-2: The Project shall include a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas.

Project Design Feature POL-PDF-3: The Project shall provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-4: The Project shall provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The Project shall design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant shall consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project, including applicable features in LAPD's Design Out Crime Guidelines.

Project Design Feature POL-PDF-7: Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant shall submit a diagram of the Project Site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

f. Transportation/Traffic

Project Design Feature TR-PDF-1: Prior to the start of construction, the Project Applicant will prepare a Construction Traffic Management Plan and

submit it to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan and submit it to the Los Angeles Department of Transportation for review and approval. The Worksite Traffic Control Plan will identify the location of any temporary street parking or sidewalk closures; show traffic/bus detours, haul routes, and hours of operation; provide for the posting of signs advising transit riders and pedestrians of temporary sidewalk closures and providing alternative routes; provide for the installation of other construction-related warning signs; and show access to abutting properties. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Schedule construction material deliveries during off-peak periods to the extent practical;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Control truck and vehicle access to the Project Site with flagmen;
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site;
- Limit sidewalk and lane closures to the maximum extent practical, and avoid peak hours to the extent practical. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity; and/or
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

Project Design Feature TR-PDF-2: The Project will relocate the existing traffic signal on Maxella Avenue at the crosswalk approximately 100 feet to the west of the Ocean Way intersection such that all movements (vehicular, pedestrian, and bicycle) would be controlled by a traffic signal, which will be subject to LADOT approval.

g. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: In addition to regulatory requirements, the Project design will incorporate the following design features to support water conservation in excess of LAMC requirements:

- High-Efficiency Dual-Flush Toilets for residential units with a flush volume of 0.92 to 1.28 gallons per flush.
- High-Efficiency Showerheads with a flow rate of 1.5 gallons per minute.
- Domestic Water Heating System located in close proximity to point(s) of use.
- Individual metering and billing for water use for every residential dwelling unit.
- Tankless and on-demand Water Heaters installed in non-residential restrooms
- Water-Saving Pool Filter.
- Pool/Spa recirculating filtration equipment.
- Installation of a meter on the pool make-up line such that water use can be monitored and leaks can be identified and repaired.
- Leak Detection System for swimming pools and spa.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Artificial turf in dog park areas.
- Proper Hydro-zoning/Zoned Irrigation–(groups plants with similar water requirements together).
- Drought-Tolerant Plants—minimum of 85 percent of total landscaping.

h. Utilities and Service Systems—Solid Waste

Project Design Feature SW-PDF-1: Implementation of a construction waste management plan to recycle and/or salvage nonhazardous debris to achieve a minimum 75-percent diversion from landfills.

Project Design Feature SW-PDF-2: Use of building materials with a minimum of 10 percent recycled content for the construction of the Project.

12. Mitigation Measures

a. Air Quality

Mitigation Measure AIR-MM-1: All construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

Mitigation Measure AIR-MM-2: Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after five minutes when not in use, to reduce vehicle emissions.

Mitigation Measure AIR-MM-3: To the extent possible, petroleum-powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators. If stationary petroleum-powered construction equipment, such as generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses, whenever possible.

b. Geology and Soils

Mitigation Measure GEO-MM-1: Prior to issuance of grading permits, the Applicant shall submit final design plans and a final design-level geotechnical report to the Los Angeles Department of Building and Safety for review and approval. The design-level geotechnical report shall be used for final design of the foundation system for the structures and shall take into consideration the engineering properties beneath the proposed structures and the projected loads. The final report shall specify geotechnical design parameters that are needed by structural engineers to determine the type and sizing of structural building materials. The final report shall be subject to the specific performance criteria imposed by all applicable state and local codes and standards. The final geotechnical report shall be prepared by a registered civil engineer or certified engineering geologist and include appropriate measures to address seismic hazards and ensure structural safety of the proposed structure. The proposed structure shall be designed and constructed in accordance with all applicable provisions of the California Building Code and the Los Angeles Building Code. The design-level geotechnical report shall address each of the recommendations provided in the *Geotechnical Feasibility Report Marina Marketplace Phase III 13450 W. Maxella Avenue, Marina del Rey, California* prepared by Golder Associates, Inc., dated January 16,

2015 (Revised March 16, 2017), including, but not limited to the following:

- A mat foundation shall be required on native soils with a static allowable bearing pressure per the final geotechnical recommendations.
- A mat foundation with an allowable passive resistance and friction factor shall be based on the recommendations of the geotechnical consultant.
- Waterproofing of the base and sides of the mat foundation shall be required to prevent moisture intrusion and water seepage through walls.
- Basement walls shall be designed per the recommendations of the final geotechnical report.
- Retaining walls shall be designed using the active and at-rest earth pressures provided in the final geotechnical report.
- Wall backfill specifications (e.g., material gradation, compaction requirements, etc.), and surcharge conditions shall be designed per the recommendations of final geotechnical report.
- Walls shall be provided with backdrains to prevent buildup of hydrostatic pressures behind walls or be designed to withstand hydrostatic pressures.
- Backdrains, if utilized, shall be designed per the recommendations of the final geotechnical report.
- Corrosivity testing shall be performed during the final design.
- Concrete mix design shall be reviewed by a qualified corrosion engineer to evaluate the general corrosion potential of the Project Site.
- Buried metallic structures and elements shall be designed with corrosions protection as determined by a qualified corrosion engineer.
- Project Site soils shall be evaluated for expansion in the final geotechnical report.
- All surface water shall be diverted away from excavations.
- All basement excavations including sloping and/or shoring shall be designed per the recommendations of the final geotechnical report.

c. Noise

Mitigation Measure NOI-MM-1: shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the northeastern property line of the Project Site between the construction areas and the apartment building at the northeast corner of Glencoe Avenue and Maxella Avenue (receptor location R4). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at receptor location R4.
- Along the eastern property line of the Project Site between the construction areas and multi-family residential use located on Glencoe Avenue (receptor location R3). The temporary sound barrier shall be designed to provide a minimum 11-dBA noise reduction at receptor location R3.
- Along the western property line of the Project Site between the construction area and the multi-family residential (receptor location R1) and hotel (receptor location R2) uses west and southwest of the Project Site, respectively. The temporary sound barrier shall be designed to provide a minimum 18-dBA and 20-dBA noise reduction at ground level of receptor locations R1 and R2, respectively.

d. Transportation/Traffic

Mitigation Measure TR-MM-1: The Project shall modify the Mindanao Way/SR-90 Eastbound On and Off-Ramps intersection so as to provide a free-flow right-turn lane for traffic turning from northbound Mindanao Way to eastbound SR-90, subject to approval by Caltrans.

e. Tribal Cultural Resources

Mitigation Measure TCR-MM-1: Prior to commencing any initial ground disturbance activities, including excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing asphalt, clearing, pounding posts, augering, blasting, stripping topsoil or a similar activity at the Project Site, the Applicant, or its successor, shall retain and pay for archeological monitors, determined by the City's Office of Historic Resources to be qualified to identify subsurface tribal cultural resources. A qualified archaeological principal investigator (qualified archaeologist), meeting the Secretary of the Interior's Professional Qualification Standards, should oversee and adjust archaeological and Native American monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency)

based on the observed potential for construction activities to encounter cultural deposits or material and as approved by the City. The archeological monitors shall observe all initial ground disturbance activities on the Project Site with potential to encounter significant cultural resources, which shall be defined as ground-disturbing activities beneath existing asphalt parking areas and landscaping to depths of 10 feet. Monitoring of depths deeper than 10 feet or within areas presently occupied by existing buildings may occur based on the recommendation of the archaeological principal investigator and observed potential to encounter cultural resources. If initial ground disturbance activities are simultaneously occurring at multiple locations on the Project Site, an archeological monitor shall be assigned to each location where the ground disturbance activities are occurring.

Prior to the commencement of any ground disturbance activities at the Project Site, the Applicant, or its successor, shall notify any California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the Project Site that ground disturbance activities are about to commence and invite the tribes to observe the ground disturbance activities, if the tribes wish to monitor.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by the qualified archeologist, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the Project; (2) and the Department of City Planning, Office of Historic Resources.
2. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Applicant, or its successor, reasonably concludes that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.
6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by a qualified archaeologist and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.
8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be

submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding paragraph 8 above, any information determined to be confidential in nature by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and shall comply with the City's AB 52 Confidentiality Protocols.

13. Summary of Alternatives

This Draft EIR examined four alternatives to the Project in detail, which include the No Project/No Build Alternative, the No Project/Development in Accordance with Existing Zoning Alternative, the Reduced Density Alternative, and the Reduced Excavation Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build Alternative

Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the three existing structures as well as the surface parking spaces would remain on the Project Site, and no new construction would occur.

While the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, the No Project/No Build Alternative would not meet any of the Project's basic objectives. Additionally, the CEQA Guidelines state that should it be determined that the No Project/No Build Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

b. Alternative 2: No Project/Development in Accordance with Existing Zoning Alternative

Alternative 2, the No Project/Development in Accordance with Existing Zoning Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing zoning on the Project Site, which is [Q]M1-1 (Qualified Limited Industrial, Height District 1). Specifically, Alternative 2 would include the development of

395,717 square feet of office uses in accordance with the office uses permitted in the MR1 zone. As with the Project, the existing shopping center-related buildings within the Project Site that together comprise approximately 100,781 square feet would be removed. Overall, Alternative 2 would construct 370,274 square feet of net new floor area within the Project Site for a total floor area ratio of 1.5:1 (a decrease of 304,055 square feet compared to the Project's 573,548 square feet of net new floor area and a decrease in FAR from 2.6:1 to 1.5:1).

The proposed office uses would be located within two three-story buildings. The proposed buildings would be 35 feet to 45 feet in height, consistent with the existing zoning, and would be reduced compared to the seven-story (77 feet in height) buildings proposed as part of the Project. The architectural features, lighting and signage, and sustainability intent of Alternative 2 would be similar to that of the Project.

With regard to vehicular parking, 741 parking spaces would be required and would be provided in accordance with the requirements of the LAMC. These parking spaces would be provided in one and one-half levels of subterranean parking below the proposed buildings.

Similar to the Project, construction of Alternative 2 would be developed in one phase. However, given the reduction in excavation and export associated with a reduced subterranean parking garage and the reduction in floor area, the construction period would be reduced compared to that of the Project.

As with the Project, Alternative 2 would require a Coastal Development Permit; Site Plan Review; and Vesting Tentative Tract Map and haul route. However, Alternative 2 would not require a General Plan Amendment, Vesting Zone and Height District Change Zone, Mello Act Compliance Review, and Master Conditional Use Permit as would the Project.

As provided in Section V, Alternatives, of this Draft EIR, Alternative 2 would not eliminate the Project's significant and unavoidable impacts related to regional air quality during construction, noise from on-site construction, vibration from on-site and off-site construction with respect to human annoyance, and intersection levels of service during operation. Alternative 2 also would not eliminate the Project's significant and unavoidable cumulative impacts related to regional air quality during construction, construction noise from on-site noise sources, off-site construction vibration with respect to human annoyance, and intersection levels of service during operation. Furthermore, Alternative 2 would result in greater impacts compared to the Project related to surface water hydrology; groundwater hydrology; fire protection during operation; intersection levels of service; and regional transportation system. Without the development of residential and commercial

uses, Alternative 2 also would not meet the underlying purpose of the Project to provide a mixed-use development that includes a significant amount of needed new multi-family housing opportunities that accommodate a range of income needs, walkable neighborhood-serving retail and restaurant uses, and expanded recreational amenities that serve the community and promote walkability. In addition, Alternative 2 would not achieve most of the Project objectives. As such, Alternative 2 was not identified as the Environmentally Superior Alternative.

c. Alternative 3: Reduced Density Alternative

Alternative 3, the Reduced Density Alternative, would reduce the residential and neighborhood-serving commercial uses proposed by the Project. Specifically, Alternative 3 proposes the development of 494 dwelling units (a reduction of 165 units compared to the Project) and 20,475 square feet of neighborhood-serving commercial uses (a reduction of 6,825 square feet compared to the Project). Overall, the Reduced Density Alternative would construct 505,747 square feet of new floor area (a reduction of 168,582 square feet compared to the Project). This accounts for a 25-percent reduction in density as compared to the Project.

Under Alternative 3, the Project Site would be developed similar to the Project. Specifically, the proposed multi-family residential and neighborhood-serving commercial uses would be provided within three mixed-use buildings that would be organized around an outdoor pedestrian paseo. However, the height of the buildings would be reduced from seven stories and a height of 77 feet to six stories with an approximate height of 67 feet. The overall design of the buildings under Alternative 3, including architectural features, lighting and signage, and sustainability, would be similar to that of the Project. Similarly, Alternative 3 would feature similar vehicular, pedestrian, and bicycle access as the Project.

With regard to vehicular parking, given the reduction in residential units and commercial square footage under this alternative, 913 parking spaces would be required and would be provided in accordance with the requirements set forth in the LAMC. Like the Project, the parking spaces would be distributed throughout the Project Site in two subterranean levels that would extend to a depth of approximately 28 feet and in two above-grade parking levels located within each of the three buildings.

As with the Project, Alternative 3 would provide a variety of open space and recreational amenities. Alternative 3 would provide 52,631 square feet of open space and recreational amenities in accordance with the open space requirements set forth in the LAMC.

Similar to the Project, to provide for development of Alternative 3, demolition of the existing uses would occur. In addition, like the Project, construction of Alternative 3 would be developed in one phase. Further, as Alternative 3 would include two levels of subterranean parking similar to the Project, Alternative 3 would require similar excavation and export as the Project. However, given the reduction in uses, the construction period would be reduced compared to that of the Project.

As with the Project, Alternative 3 would require a General Plan Amendment to the Palms–Mar Vista–Del Rey Community Plan to change the Community Plan land use designation from Limited Manufacturing to General Commercial; a Vesting Zone and Height District Change from [Q]M1-1 to (T)(Q)C2-2D; Site Plan Review; a Master Conditional Use Permit to allow the onsite and offsite sale of a full line of alcoholic beverages; Coastal Development Permit; Mello Act Compliance Review; and Vesting Tentative Tract Map and haul route.

While Alternative 3 would eliminate the Project's impact to Intersection No. 17 (Mindanao Way/SR-90 EB Ramps) under Existing with Project Conditions, Alternative 3 would not eliminate any of the Project's significant and unavoidable impacts. However, with a similar mix of residential and commercial uses as the Project, Alternative 3 would mostly meet the underlying purpose of the Project to provide a mixed-use development that includes a significant amount of needed new multi-family housing opportunities that accommodate a range of income needs, walkable neighborhood-serving retail and restaurant uses, and expanded recreational amenities that serve the community and promote walkability. In addition, Alternative 3 would achieve many of the Project objectives. While Alternative 3 would not eliminate any of the Project's significant and unavoidable impacts, given the reduction in uses, Alternative 3 would reduce certain traffic impacts as well as reduce many of the Project's less-than-significant impacts compared to the other alternatives. Thus, of the range of alternatives analyzed, Alternative 3 was identified as the Environmentally Superior Alternative.

d. Alternative 4: Reduced Excavation Alternative

Alternative 4, the Reduced Excavation Alternative, would construct a mixed-use project similar to the Project. However, Alternative 4 would reduce the number of dwelling units proposed on the Project Site and reduce the number of subterranean parking levels. Specifically, Alternative 4 proposes the development of 601 dwelling units (a reduction of 57 units compared to the Project) and 27,300 square feet of neighborhood-serving commercial uses, which is the same amount of neighborhood-serving commercial uses proposed under the Project. Overall, the Reduced Excavation Alternative would construct 516,337 square feet of new floor area (a reduction of 57,211 square feet compared to the Project. Under Alternative 4, the proposed uses would be provided within one large, five-story mixed-use building that would extend across the entire Project Site. The ground

floor would also include a parking area with access to services and loading areas. One large outdoor courtyard would be provided in the center of the Project Site, while three smaller outdoor courtyards would be provided along Glencoe Avenue. The height of the building would be reduced from seven stories and a height of 77 feet to five stories with a height of 62 feet. The overall design of the building under Alternative 4, including architectural features, lighting and signage, and sustainability, would be similar to that of the Project. Vehicular access would be provided via several driveways off of Maxella Avenue and Glencoe Avenue. Pedestrian and bicycle access would be available throughout the Project Site.

With regard to vehicular parking, given the reduction in residential units under this alternative, 1,126 parking spaces would be required by Alternative 4, compared to 1,217 parking spaces required by the Project, and would be provided in accordance with the requirements set forth in the LAMC. The parking spaces would be distributed throughout the Project Site in one subterranean level that would extend to a depth of approximately 14 feet, and on one ground floor level.

As with the Project, Alternative 4 would provide a variety of open space and recreational amenities. In total, in accordance with the open space requirements of the LAMC, Alternative 4 would provide 64,000 square feet of open space.

Similar to the Project, to provide for development of Alternative 4, demolition of the existing uses would occur. In addition, like the Project, construction of Alternative 4 would be developed in one phase. However, as Alternative 4 would include one level of subterranean parking, Alternative 4 would result in a reduction in excavation and export compared to the Project. Additionally, given the reduction in uses, the building construction period may be slightly reduced compared to that of the Project.

As with the Project, Alternative 4 would require a General Plan Amendment to the Palms–Mar Vista–Del Rey Community Plan to change the Community Plan land use designation from Limited Manufacturing to General Commercial; a Vesting Zone and Height District Change from [Q]M1-1 to (T)(Q)C2-2D; Site Plan Review; a Master Conditional Use Permit to allow the onsite and offsite sale of a full line of alcoholic beverages; Coastal Development Permit; Mello Act Compliance Review; and Vesting Tentative Tract Map and haul route.

While Alternative 4 would reduce traffic impacts, Alternative 4 would not eliminate any of the Project's significant and unavoidable impacts. Therefore, while Alternative 4 would mostly meet the underlying purpose of the Project and the Project objectives, it was not identified as the Environmentally Superior Alternative.

e. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project/No Build Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to regional air quality during construction, noise from on-site construction, vibration from on-site and off-site construction with respect to human annoyance, and intersection levels of service during operation. Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts related to regional air quality during construction, construction noise from on-site noise sources, off-site construction vibration with respect to human annoyance, and intersection levels of service during operation. Alternative 1 would also reduce all of the Project's less-than-significant and less-than-significant-with-mitigation impacts. However, the No Project/No Build Alternative would not meet any of the Project's basic objectives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Reduced Density Alternative, would be the Environmentally Superior Alternative. While Alternative 3 would not eliminate any of the Project's significant and unavoidable impacts, given the reduction in uses, Alternative 3 would reduce certain traffic impacts as well as reduce many of the Project's less-than-significant impacts compared to the other alternatives. Thus, of the range of alternatives analyzed, Alternative 3 would be the Environmentally Superior Alternative.