

# VI. OTHER CEQA CONSIDERATIONS

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This section is based on information provided in the *Initial Study* prepared in November 2020 (contained in Appendix A-1 of this Draft EIR) and the *11973 San Vicente Boulevard, Seismic Assessment*, prepared by Englekirk Structural Engineers on June 6, 2022 (included in Appendix G of this Draft EIR).

## 1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

*Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant and unavoidable impacts related to historical resources and land use. All other impacts associated with the Project would be less than significant or reduced with mitigation to less than significant.

### a) Historical Resources

As evaluated in Section IV.B, Cultural Resources, of this Draft EIR, the Project would demolish the Barry Building and all those physical characteristics that convey its historical significance and that justify its designation as a City historic-cultural monument (HCM). Thus, the Project would materially impair the significance of the Barry Building and would cause a substantial adverse change in the significance of an historical resource as defined by CEQA. Therefore, Project impacts related to historical resources would be significant and unavoidable.

### b) Land Use and Planning

As evaluated in Section IV.D, Land Use and Planning, of this Draft EIR, the Project would conflict with the applicable policies of the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan related to historic preservation. Therefore, Project impacts related to land use would be significant and unavoidable.

## 2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines states that where there are impacts that cannot be alleviated without

imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As discussed in Section II, Project Description, of this Draft EIR, the Project consists of the demolition of the Barry Building, which has been vacant and fenced off since 2017, and the installation of a landscape buffer along the southern boundary of the Project Site. While the existing building is currently designated as a City of Los Angeles HCM, the building is likely to suffer significant damage when subject to a moderate to strong earthquake in the Los Angeles basin. Some portions of the building have no significant seismic resisting elements that can resist the seismic forces from the roof and the second floor and can result in a possible collapse when subject to a moderate to strong earthquake. According to the seismic assessment prepared for the existing building (included in Appendix G of this Draft EIR), these structural deficiencies represent safety hazards to occupants in and around the building.

In addition, the building is subject to the City's Soft Story Ordinance Retrofit Program (LAMC Section 91.9300 et seq., Ordinance 183,893 entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls) and must meet the minimum seismic standards of that ordinance or apply for a permit to demolish the building within a certain period of time. In March 2018, the City of Los Angeles issued the Applicant an Order to Comply with the City's Soft Story Retrofit Program.

Therefore, notwithstanding the fact that the existing building is a City-designated HCM, the Project Applicant has proposed to demolish the building based on the potential for damage and safety hazards in the event of an earthquake and also to comply with the Order to Comply with the City's Soft Story Retrofit Program.

As discussed above, the Project would result in significant and unavoidable impacts related to historical resources and land use. Four alternatives to the Project were considered in Section V, Alternatives, of this Draft EIR. Alternative 1 is the No Project Alternative, which assumes that the Project would not be implemented, and the existing building would not be demolished. As Alternative 1 involves the retention of the existing building, it would avoid the significant impacts related to historical resources and land use. However, while Alternative 1 would comply with the requirements of the City's Soft Story Retrofit Program, the building would still present a seismic risk and safety hazard and could not be occupied. Therefore, Alternative 1 would only meet one of the two Project objectives.

Alternative 2, the Preservation Alternative, involves the voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades of the existing building, after which the building would be re-occupied by approximately 12,800 square feet of retail uses. Per LAMC Section 12.21 A.4 (x)(2), parking for the rehabilitated Barry Building may, in the City's discretion, remain the same as the parking currently existing on the parcel where the Barry Building is located. As Alternative 2 involves the preservation of the existing building, Alternative 2 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 2 includes an operational component (the re-occupancy of the building), Alternative 2 would result in greater impacts than the Project with respect to air quality,

greenhouse gas emissions, noise, and traffic. Finally, as demonstrated in the analysis contained in Section V of this Draft EIR, Alternative 2 would meet both of the Project objectives.

Alternative 3, the Partial Preservation with New Construction Alternative, involves the partial preservation of the existing building with new construction on the remaining portion of the Project Site. Specifically, Alternative 3 would preserve the south, east, and west wings of the building, the courtyard, and the south façade of the north wing, and would include the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades to the preserved portion of the existing building. In addition, Alternative 3 would include the construction of a new building behind (north of) the existing building. In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses. Per LAMC Section 12.21 A.4 (x)(2), parking for the rehabilitated Barry Building may, in the City's discretion, remain the same as the parking currently existing on the parcel where the Barry Building is located. However, that LAMC section may not apply to the parking required for the new building constructed behind the Barry Building. Therefore, the impact analyses assumed that Alternative 3 would potentially require a parking variance from the City to provide additional parking for the new floor area. As Alternative 3 involves the preservation of the existing building, Alternative 3 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, Alternative 3 would include greater impacts during construction with respect to air quality, greenhouse gases, and noise based on the construction of the new building. Further, as Alternative 3 includes an operational component, Alternative 3 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic. Finally, as demonstrated in the analysis contained in Section V of this Draft EIR, Alternative 3 would meet both of the Project objectives.

Alternative 4, the Relocation Alternative, involves the dismantling of the Barry Building into multiple small building portions to facilitate its relocation to a new site, which has yet to be identified. At the new location, the Barry Building would be reconstructed, which would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficient upgrading. Once the building has been moved and rehabilitated, it would be occupied by 12,800 square feet of retail uses. As Alternative 4 involves the preservation of the existing building, Alternative 4 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use, with mitigation measures for historical resources. However, as Alternative 4 includes an operational component, Alternative 4 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic. Finally, as demonstrated in the analysis contained in Section V of this Draft EIR, Alternative 4 would meet both of the Project objectives.

As discussed in Section V, Alternatives, of this Draft EIR, Alternative 2 is considered the Environmentally Superior Alternative. However, this determination does not take into account the feasibility of the alternative.

### 3. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes, including: (1) solid waste disposal effects on landfills; (2) water; and (3) energy resources. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

#### a) Solid Waste

Solid waste was addressed in the Initial Study (included in Appendix A-1 of this Draft EIR) and the discussion is also summarized at the end of this section. As discussed therein, the Project would demolish of the existing commercial building, which is expected to generate a total of approximately 4,174 cubic yards of debris, including 130 cubic yards of asbestos-containing material and 4,044 cubic yards of non-contaminated debris. The 130 cubic yards of asbestos-containing material would be entirely disposed of at the Azusa Land Reclamation Facility. Compliance with SB 1374 would require the recycling or salvaging of 75 percent of the remaining 4,044 cubic yards of debris. This would equate to approximately 1,011 cubic yards (or 404,400 pounds or 202 tons) that would be disposed of at a landfill over the course of demolition. The Initial Study determined that the landfills serving the Project Site would have adequate capacity to accommodate the solid waste generated by the demolition of the existing building. Because of the recycling of most of the solid waste generated by the Project, and the available capacity at landfills serving the Project Site, the Project’s short-term solid waste disposal effects on landfills would be reduced.

#### b) Water

As stated in the Initial Study (included in Appendix A-1 of this Draft EIR), and as summarized later in this section, the Project would require a limited amount of water for dust control during demolition activities and to water the landscape buffer planted along the fence after demolition has been completed. As discussed in the Initial Study, LADWP would be able to supply water for the Project’s demolition activities and to water the landscape buffer based on its existing supply. Thus, while the Project would result in a limited amount of irreversible consumption of water, the Project would not result in a significant impact related to water supply.

### **c) Energy**

The proposed construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). This electricity would be supplied to the Project Site by the City of Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Electricity consumed during demolition of the existing building and installation of the landscape buffer would be temporary and would cease upon the completion. Construction activities would also consume energy in the form of petroleum-based fuels associated with the use of construction vehicles, construction worker travel to and from the Project Site, and hauling truck trips. Based on the limited amount of equipment required and the limited duration of construction activities, the Project would require a negligible fraction of the State's total transportation fuel consumption. Therefore, the Project would not have an adverse impact on available electricity or fuel supplies.

The Project consists solely of the demolition of the existing building and the installation of a landscape buffer on the southern boundary of the Project Site. Development of the Project Site is not proposed and/or considered as part of the Project. Therefore, the Project would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer.

Overall, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources, and Project impacts would be less than significant.

### **d) Conclusion**

Based on the above, the Project would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources for future generations or for other uses. However, the consumption of such resources would not be considered substantial. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by the Project's construction activities is justified.

## **4. Growth-Inducing Impacts**

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a

discussion of the characteristics of projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

The Project consists of the demolition of the Barry Building. Once demolition is complete, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). Development of the Project Site is not proposed and/or considered as part of the Project. The demolition activities would occur over approximately 36 working days, with one additional day to plant the landscape buffer, and would require a daily maximum of 10 construction workers during any given day. The patterns of construction workers in Southern California are such that it is not likely that the workers for the Project would relocate their households as a consequence of being employed to conduct the Project's demolition work, especially given the short duration of demolition activities. Therefore, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing employment opportunities during the demolition period.

As the Project does not include any new development on the Project Site, the Project would not result in a population increase at the Project Site due to new housing or employment opportunities that could result in substantial unplanned growth either directly or indirectly. Likewise, the Project also would not require any utility infrastructure improvements. Therefore, the Project would not result in any direct or indirect growth-inducing impacts.

## **5. Potential Secondary Effects of Mitigation Measures**

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

### **a) Historical Resources**

Mitigation Measure MM-CUL-1 requires the Barry Building to be documented to meet Historic American Building Survey (HABS) Level 1 standards prior to demolition. This mitigation measure would not result in adverse secondary impacts, and instead, would be beneficial in terms of having documentation of the Barry Building.

### **b) Noise**

Mitigation Measure MM-NOI-1 pertains to noise impacts during demolition and requires the installation of temporary sound barriers. The installation of these temporary sound barriers would not result in adverse secondary impacts, and instead, these barriers would be beneficial in terms of reducing noise at surrounding uses during the proposed demolition activities. Further, upon completion of the demolition activities, the temporary sound barriers would be removed.

## 6. Effects Not Found To Be Significant

In addition to the environmental impact categories analyzed in detail in this EIR, the City of Los Angeles (the “City”) has determined through the preparation of an Initial Study (included as Appendix A-1 to this Draft EIR) that the development and operation of the Project would not result in potentially significant impacts to the environmental impact topics discussed below. Section 15128 of the CEQA Guidelines states the following:

*An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an Initial Study.*

It has been determined that there is no evidence that the Project would cause significant environmental effects in the following areas and that no further environmental review of these issues is necessary:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality (odors)
- Biological Resources
- Cultural Resources (archaeological resources and human remains)
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning (physically divide an established community)
- Mineral Resources

- Noise (airport noise)
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic (plan consistency, VMT, and design feature hazards)
- Utilities and Service Systems
- Wildfire

A summary of the analyses contained in the Initial Study for each environmental issue not found to be significant is provided below.

#### **a) Aesthetics**

##### ***a) The Project would not have a substantial adverse effect on a scenic vista.***

The Project Site is located in an urbanized portion of the City and is topographically relatively flat. Surrounding uses vary in height from one- and two-story single-family residences to the north, to multi-story commercial buildings to the south, west, and east. No scenic vistas or viewpoints are visible from the Project Site. While the Project Site is located within the boundaries of the San Vicente Scenic Corridor Specific Plan, the plan area is not considered a scenic vista. The San Vicente Scenic Corridor Specific Plan establishes streetscape, and urban design criteria to protect the pedestrian-scale and community-oriented commercial nature along San Vicente Boulevard.

The 0.61-acre Project Site is currently improved with an existing two-story, approximately 13,956 square foot commercial building commonly referred to as the Barry Building and a surface parking lot. The building is a designated City of Los Angeles HCM (HCM No. LA-887) that has been vacant and fenced since 2017. The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. Since no future development of the Project Site is proposed and/or considered, the Project would not increase building height on the Project Site or alter the panoramic views that include the Project Site or interfere with current views of the Pacific Ocean and the distant horizon line that are available from the public right-of-way within the Santa Monica Mountains. Thus, the Project would not have a substantial adverse effect on a scenic vista and impacts would be less than significant.

***b) The Project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings, within a state-designated scenic highway.***

The Project Site is not located within a state scenic highway.<sup>1</sup> The nearest state designated scenic highway is Topanga Canyon State Scenic Highway, located approximately six miles northwest of the Project Site. Additionally, there are no on-site protected trees and/or rock outcroppings. Therefore, the Project would not substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings located within a state scenic highway and impacts would be less than significant.

***c) The Project would not conflict with applicable zoning or other regulations governing scenic quality.***

The Project Site is located within an urbanized area. Thus, the analysis contained in the Initial Study (included as Appendix A-1 of this Draft EIR) focused on whether the Project would conflict with any applicable zoning and/or other regulations governing scenic quality. These regulations include applicable policies from the General Plan Framework Element Urban Form and Neighborhood Design Chapter, Brentwood-Pacific Palisades Community Plan, San Vicente Scenic Corridor Specific Plan, Los Angeles Citywide Design Guidelines, West Los Angeles Transportation Improvement Plan, LAMC zoning regulations (including building heights and setbacks), and LAMC tree replacement requirements, and lighting and signage requirements. As demonstrated in the analysis contained in the Initial Study, the Project would not conflict with the applicable zoning and/or other regulations governing scenic quality and impacts would be less than significant.

***d) The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.***

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot and the existing surface parking lot would remain. The Project Site would be fenced and would include a landscape buffer consistent with the requirements of the San Vicente Scenic Corridor Specific Plan. Thus, the Project would not introduce light and/or daytime glare.

Construction activities would be in accordance with the provisions of LAMC Section 41.40 and would occur between 7 AM and 9 PM on weekdays and between 8 AM and 6 PM on Saturdays and national holidays, with no construction permitted on Sundays. Construction would occur

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<sup>1</sup> California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways, [https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019\\_a11y.xlsx](https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx), accessed February 19, 2020.

primarily during daylight hours and construction-related illumination would be used for security and safety reasons only and would be aimed so that no new direct beam of illumination goes beyond the Project Site boundary. Construction activities would not result in a new source of substantial light which would adversely affect day or nighttime views in the area.

As the Project does not propose any new development, there would be no new sources of light or glare on the Project Site, and no impact would occur.

### **b) Agricultural and Forestry Resources**

***a) The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.***

The Project Site is currently developed with a commercial building, does not contain any agricultural uses, and is not delineated on any maps prepared pursuant to the Farmland Mapping and Monitoring Program.<sup>2</sup> Therefore, no impact would occur.

***b) The Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract.***

The Project Site is designated for Neighborhood Office Commercial in the Brentwood-Pacific Palisades Community Plan and is currently zoned C4-1VL, for commercial uses. No agricultural zoning designations and/or Williamson Act contracts apply to the Site. Therefore, no impact would occur.

***c) The Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 [g]).***

The Project Site is currently zoned C4-1VL, for commercial uses, and is not zoned for forest land or timberland. Therefore, no impact would occur.

***d) The Project would not result in the loss of forest land or conversion of forest land to non-forest use.***

The Project Site is currently zoned C4-1VL, for commercial uses, and is currently developed with an existing commercial building. The Project Site is not used as forest land, and therefore, the

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<sup>2</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf> , accessed February 13, 2020.

Project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

***e) The Project would not involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use.***

The Project Site is currently developed with a commercial building. The Project Site does not contain any agricultural or forest land. As such, the Project would not result in the conversion of Farmland to a non-agricultural use or the conversion of forest land to a non-forest use, and no impact would occur.

### **c) Air Quality**

***d) The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.***

Activities and materials associated with construction would be typical of construction projects of similar type and size, and Project contractors would comply with applicable SCAQMD rules related to the use of construction materials that do not cause substantial impacts related to odor. Any odors that may be generated during construction would be localized and temporary in nature, and would not have the potential to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Accordingly, impacts with regard to odors would be less than significant.

### **d) Biological Resources**

***a) The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.***

The Project Site is located in an urbanized area and is currently developed with a commercial building and an associated surface parking lot. Landscaping is limited with four on-site palms and several raised bed planters. Due to the developed nature of the Site, and lack of any natural open spaces, species likely to occur on-site are limited to small terrestrial animals. Therefore the Project would not have a substantial adverse effect, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, no impact would occur.

***b) The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.***

The Project Site and surrounding area are located in an urbanized setting. The Project Site is currently developed with a commercial building and an associated surface parking lot. There are no riparian areas, sensitive natural communities, or Significant Ecological Areas as defined by the City of Los Angeles located on or adjacent to the Project Site.<sup>3</sup> Therefore, no impact would occur.

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

The Project Site and surrounding area are located in an urbanized setting. The Project Site is currently developed with a commercial building and an associated surface parking lot. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Site.<sup>4</sup> No impact would occur.

***d) The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.***

The Project Site is located in an urbanized area and developed with a commercial building and an adjacent surface parking lot. Several individual parcels adjacent to the Site are undeveloped, however none of the parcels provide linkages to large open space and/or serve as a wildlife corridor. Accordingly, demolition of the existing building would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as a habitat for native resident or migratory fish exist on the Project Site or in the vicinity of the Site.

The existing on-site palms (three of which would be removed as part of the Project while the fourth would be retained) could potentially provide nesting sites for migratory birds. The Project would be required to comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent that vegetation removal activities must occur during the nesting season (February 1 through August 31), a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with existing regulatory requirements, impacts to nesting and migratory birds would be less than significant.

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<sup>3</sup> NavigateLA, Water, Lakes, and Streams layer: <http://navigatela.lacity.org/navigatela/>, accessed February 13, 2020.

<sup>4</sup> U.S. Fish & Wildlife Service, National Wetlands Inventory: <http://www.fws.gov/wetlands/data/mapper.HTML>, accessed February 13, 2020.

***e) The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands).***

According to the tree report prepared for the Project Site (included as Appendix A to the Initial Study, which is attached as Appendix A-1 to this Draft EIR), there are no protected trees located on the Project Site. There are four on-site non-protected palms all which meet the City's minimum size threshold for regulation as non-protected trees (i.e. trees with a trunk diameter at breast height (dbh) greater than eight inches or palms with a height of 15 feet or greater). Of the four palms, three would be removed as part of the Project, and the palm located in the parking lot would remain. The two street trees located in the public right of way along San Vicente Boulevard would also remain. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

***f) The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.***

The Project Site and surrounding area are located in an urbanized setting. The Project Site is currently developed with a commercial building and an associated surface parking lot. The Project Site is not located in or adjacent to an existing or proposed Significant Ecological Area.<sup>5</sup> Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project would not conflict with any habitat conservation plans. Therefore, no impact would occur.

### **e) Cultural Resources**

***b) The Project would not cause a substantial adverse change in the significance of an archaeological resource.***

The Project Site is located in an urbanized area of the City and has been disturbed by past development activities. The Project would demolish the existing Barry Building, which would include removal of existing utilities that are approximately two to five feet underground, and install and landscape buffer along the southern boundary of the Project Site. According to the South Central Coastal Information Center (SCCIC) (correspondence included in Appendix F-2 of this Draft EIR), there are no known archaeological resources at the Project Site. In addition, the removal of the existing utilities (approximately two to five feet underground) would only disturb soils that have been previously disturbed by past development activities. Therefore, it is unlikely that any archaeological resources would be discovered during the removal of the existing utilities. As such, Project impacts would be less than significant.

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<sup>5</sup> NavigateLA, Significant Ecological Area layer: <http://navigatela.lacity.org/navigatela/>, February 13, 2020.

***c) The Project would not disturb any human remains, including those interred outside of dedicated cemeteries.***

The Project Site is located in an urbanized area and is developed with an existing commercial building and associated surface parking. No known traditional burial sites or other type of cemetery usage has been identified with the Project Site and immediate vicinity. The likelihood of encountering human remains on the Project Site is therefore minimal. The Project would demolish the existing building, which would include removal of existing utilities that are approximately two to five feet underground, and install a landscape buffer along the southern boundary of the Project Site. Although unlikely, there is a possibility that human remains could be encountered during construction activities, which is a potential significant impact. If human remains are encountered during demolition activities, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98.

Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains discovered during demolition activities. Therefore, the Project's impacts on human remains would be less than significant.

**f) Energy**

***a) The Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.***

The Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during demolition of the existing Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. Once construction activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot and the existing surface parking lot would remain. No future development of the Project Site is proposed and/or considered as part of the Project. Therefore, the Project would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer. The Project's energy requirements during demolition would not significantly affect local and regional supplies or capacity. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project. 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 would be less than significant.

***b) The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.***

The Project would not result in an increase in demand for electricity, natural gas, or petroleum 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, the Project would not conflict with or

obstruct a state or local plan for renewable energy or energy efficiency and potential impacts would be less than significant.

### **g) Geology and Soils**

***a.i) The Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or based on other substantial evidence of a known fault.***

The Project Site is not located within the Alquist-Priolo Earthquake Fault Zone for the Santa Monica Fault, nor is it located within a City-designated Preliminary Fault Rupture Study area according to ZIMAS. No Holocene-active or pre-Holocene faults with the potential for surface fault rupture are known to pass directly beneath the Project Site.<sup>6</sup> In addition, no future development of the Project Site is proposed and/or considered as part of the Project. Therefore, based on these considerations, the Project would not exacerbate existing fault rupture conditions. Thus, the Project would not exacerbate existing environmental conditions by bringing people and/or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant.

***a.ii) The Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.***

The existing building is currently vacant with no occupants and no future development of the Project Site is proposed and/or considered as part of the Project. The Project does not call for the building to be occupied. Thus, potentially significant impacts related to seismic ground shaking at the Project Site would not be exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would exacerbate ground shaking. Further, as discussed above, no active faults with the potential for surface rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking would be less than significant.

***a.iii) The Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.***

The Project Site is not identified by ZIMAS as being within a liquefaction zone.<sup>7</sup> Further, according to the Geologic Hazard Evaluation (included as Appendix C-1 to the Initial Study, which is

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<sup>6</sup> Geologic Hazard Evaluation, Geocon West, Inc., June 12, 2020, at page 5. Included as Appendix C-1 to the Initial Study, which is attached as Appendix A-1 of this Draft EIR.

<sup>7</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, accessed February 14, 2020.

attached as Appendix A-1 of this Draft EIR), the potential for liquefaction at the Project Site is considered low.<sup>8</sup> The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. Therefore, the Project would not expose people and/or structures to substantial adverse effects associated with liquefaction, and the Project would not exacerbate existing conditions related to liquefaction. Therefore, impacts with respect to liquefaction would be less than significant.

***a.iv) The Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides.***

The Project Site is relatively flat and is not identified by ZIMAS as being within a landslide hazard zone.<sup>9</sup> The Project Site is not located within an area identified as having a potential for seismic slope instability. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides.<sup>10</sup> The Project would not exacerbate existing conditions that would result in the exposure of peoples and/or structures to potential substantial adverse effects, including the risk, of loss, injury, or death involving landslides. The Project consists solely of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. Therefore, the Project would result in no impacts with respect to landslides.

***b) The Project would not result in substantial soil erosion or the loss of topsoil.***

The Project Site is located in an urbanized portion of the City and is currently improved with an existing two-story commercial building and a portion of a surface parking lot. The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. After construction activities are completed, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot and the existing surface parking lot would remain. Construction activities have the potential to disturb existing soils and expose soils to rainfall and wind, thereby resulting in soil erosion. The potential for soil erosion would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City of Los Angeles Department of Building and Safety (LADBS) as well as comply with all applicable provisions of LAMC Chapter IX Article 1, which addresses grading, excavation and fills. Furthermore, demolition activities would comply with SCAQMD Rule 403 (Fugitive Dust),

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<sup>8</sup> Geologic Hazard Evaluation, Geocon West, Inc., June 12, 2020, at page 9. Included as Appendix C-1 to the Initial Study, which is attached as Appendix A-1 of this Draft EIR.

<sup>9</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, accessed February 14, 2020.

<sup>10</sup> Geologic Hazard Evaluation, Geocon West, Inc., June 12, 2020, at page 9. Included as Appendix C-1 to the Initial Study, which is attached as Appendix A-1 of this Draft EIR.

which would reduce the potential for wind or waterborne erosion. Through compliance with these existing regulations, Project impacts related to soil erosion and/or erosion of topsoil during demolition activities would be less than significant.

***c) The Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.***

The Project Site is not located near slopes or geographic features that would result in on- or off-site landslide or lateral spreading. As stated above, under Threshold a.iii), the Project Site is not subjected to impacts which could be caused by liquefaction. According to the Geologic Hazard Evaluation (included in Appendix C-1 to the Initial Study, which is attached as Appendix A-1 of this Draft EIR), the Project area, including the Project Site, is not within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the immediate vicinity. Groundwater was not encountered in the on-site borings drilled to a maximum feet depth of almost 31 feet, thus collapse is unlikely on the Project Site.<sup>11</sup>

As discussed in the Geologic Hazard Evaluation, oxidation of peat deposits can result in a corresponding loss of volume, creating a potential for settlement in areas where structures or compacted fill are located. Considering the geologic conditions at the Project Site and the surrounding area, peat is not anticipated to be present at the Project Site. Therefore, the probability of hazards associated with peat oxidation impacting the Project is considered very low.<sup>12</sup>

Finally, future development on the Project Site is not proposed and/or considered as part of the Project. Therefore, the Project would not exacerbate existing conditions with regard to geologic and soil stability and no impact would occur.

***d) The Project would not be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code.***

According to the Geologic Hazard Evaluation prepared for the Project Site, the soils at the Project Site consist of artificial fill, consisting of silty sand that is characterized as slightly moist and medium dense with some construction debris, to a depth of two feet below ground surface.<sup>13</sup> Beneath the artificial fill, the soils are characterized as medium dense to very dense or firm to hard, and would be in the moderate expansion range. Further, the Project consists of the

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<sup>11</sup> Geologic Hazard Evaluation, Geocon West, Inc., June 12, 2020, at page 9. Included as Appendix C-1 to the Initial Study, which is attached as Appendix A-1 of this Draft EIR.

<sup>12</sup> Geologic Hazard Evaluation, Geocon West, Inc., June 12, 2020, at page 9. Included as Appendix C-1 to the Initial Study, which is attached as Appendix A-1 of this Draft EIR.

<sup>13</sup> Geologic Hazard Evaluation, Geocon West, Inc., June 12, 2020, at page 1. Included as Appendix C-1 to the Initial Study, which is attached as Appendix A-1 of this Draft EIR.

demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. Thus, the Project would not exacerbate existing environmental conditions related to expansive soils. Impacts with respect to expansive soils would be less than significant.

***e) The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.***

The Project does not propose any septic tanks or alternative wastewater disposal systems. Further, demolition and construction activities typically do not involve the generation of wastewater that would need to be treated by wastewater treatment infrastructure that serves the Project Site, and as such, the Project would not generate wastewater that would have the potential to impact the soils at the Project Site. Therefore, the Project would not result in any impacts with respect to septic tanks or alternative wastewater disposal systems.

***f) The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.***

The Project Site is located in an urbanized area of the City, has been previously graded and is currently improved with an existing commercial building commonly referred to as the Barry Building and a portion of a surface parking lot. According to the Natural History Museum of Los Angeles County (see correspondence included in Appendix C-2 of the Initial Study, which is attached as Appendix A-1 of this Draft EIR), there are no known vertebrate fossil localities that lie directly within the Project Site boundaries, although there are localities nearby from the same sedimentary deposits that occur in the Project area.

According to the correspondence from the Natural History Museum, excavations that extend below about five feet could encounter significant fossil vertebrate specimens. As the Project Site would only be excavated to remove the existing utilities (approximately two to five feet underground), and would only disturb soils that have been previously disturbed by past development activities, it is unlikely that paleontological resources would be discovered during demolition. While unlikely, in the event that paleontological resources or sites, or unique geologic features are exposed during demolition, the City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified paleontologist to assess the find and, if necessary, developing a plan for removal and treatment of the find. Overall, with adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

## **h) Hazards and Hazardous Materials**

### ***a) The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.***

The demolition of the existing building could require the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fuels. The types and amounts of hazardous materials that would be used in connection with the demolition activities would be typical of those used during construction of individual development projects. All potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. No hazardous materials would be used once the demolition activities are complete as the Project Site would remain vacant. In addition, no pesticides are currently used in the maintenance of the existing landscaping, and pesticides would not be used in the maintenance of the landscape buffer. The anticipated and potential pollutants generated by the Project may include sediment, nutrients, and debris, although they would not be generated in significant quantities. Therefore, any associated risk would be reduced to a less than significant level through compliance with these standards and regulations. Thus, Project impacts would be less than significant.

### ***b) The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.***

The Project involves the demolition of the existing commercial building, which was constructed in 1951. Based on the age of the existing building, it is assumed that it contains asbestos containing materials (ACMs). In accordance with existing City, State, and federal rules and regulations, including the federal EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (40 Code of Federal Regulations 61 Subpart M), the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926.1101), California Occupational Safety and Health Administration (CAL-OSHA) regulations (California Code of Regulations, title 8, Sections 341.15, 1529), and SCAQMD Rule 1403, all materials which are identified as ACMs, would be removed by a trained and licensed asbestos abatement contractor. Generally, asbestos removal is a low risk operation. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited.

As the existing building was constructed in 1951, it is likely that it also contains lead-based paint (LBP). Demolition of the existing building could therefore release LBP present in the structure. In order to ensure minimal exposure to sensitive receptors and workers, LBP found in the building shall be removed and disposed of as recommended by a qualified Department of Health Services lead consultant and in accordance with applicable federal, state, and city regulations, including the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926 et seq.), CAL-OSHA regulations (California Code of Regulations, title 8, Sections 1532.1 and 35001 et seq.). Mandatory compliance with applicable federal and state

standards and procedures would reduce risks associated with LBPs to a less than significant level.

As discussed below under “Mineral Resources” Threshold (a), the Project Site is not located within an inactive or active oil field and is not within a Methane Zone or Methane Buffer Zone as identified by the City. The removal and disposal of ACMs and LBP from the Project Site in accordance with existing regulations would ensure that the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and impacts would be less than significant.

***c) The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.***

Brentwood Presbyterian Pre-School is located approximately 200 feet southwest of the Project Site and Brentwood Science Magnet School is located approximately 0.4-miles southwest of the Project Site. As discussed above under Threshold IX(a), the types and amounts of hazardous materials that would be used in connection with the Project’s demolition activities would be typical of those used during construction of individual development projects, including vehicle fuels, oils, and transmission fuels. As the Project Site would remain vacant after the demolition activities are complete, there would be no hazardous materials associated with operation of the Project. In addition, no pesticides are currently used in the maintenance of the existing landscaping, and pesticides would not be used in the maintenance of the landscape buffer. Further, the Project would not involve the use or handling of acutely hazardous materials, substance, or waste. All materials used during demolition activities would be used in accordance with the manufacturers’ instructions and handled in compliance with federal, state, and local regulations. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, Project impacts would be less than significant.

***d) The Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.***

According to EnviroStor, no record of known hazardous cleanup or hazardous waste facilities exists on the Project Site.<sup>14</sup> According to GeoTracker, no record of known contamination, leaking USTs, or monitoring wells exists on the Project Site.<sup>15</sup> Further, the Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.<sup>16</sup> In addition, there are no active Cease and Desist Orders or Cleanup and

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<sup>14</sup> State of California Department of Toxic Substances Control, EnviroStor, website: <https://www.envirostor.dtsc.ca.gov/public/>, accessed February 17, 2020.

<sup>15</sup> State of California Environmental Protection Agency, State Water Resources Control Board, GeoTracker, website: <https://geotracker.waterboards.ca.gov/>, accessed February 17, 2020.

<sup>16</sup> State of California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website:

Abatement Orders from the California Water Resources Control Board associated with the Project Site.<sup>17</sup> Finally, the Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.<sup>18</sup> Thus, the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard to the public or environment, and no impact would occur.

***e) The Project is not located within an airport land use plan, or within two miles of a public airport or public use airport.***

The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. Santa Monica Airport is located approximately three miles southeast of the Project Site. Therefore, no impact would occur.

***f) The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.***

The 0.61-acre Project Site is currently improved with an existing commercial building and a portion of a surface parking lot. The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. Demolition of the building would result in the removal of approximately 4,174 cubic yards of debris from the Project Site. Construction activities would be confined to the Project Site, and the parcel immediately north of the Project Site (APN 4404-025-016) would be used for staging. There are no adopted emergency response plans or emergency evacuation plans that are applicable to the Project Site, although according to the Safety Element of the General Plan (Exhibit H), San Vicente Boulevard is a selected disaster route. As the proposed construction activities and staging areas would be confined to the Project Site and the adjacent parcel to the north, the Project is not expected to interfere with emergency response or emergency evacuation for the surrounding area. Once the construction activities are complete, the Project Site would remain vacant and thus, the Project would not generate traffic congestion that would interfere with an emergency response or evacuation plan. As such, no impact would occur.

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<https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>, accessed February 17, 2020.

<sup>17</sup> State of California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CDOCAOList.xlsx>, accessed February 17, 2020.

<sup>18</sup> State of California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/>, accessed February 17, 2020.

***g) The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.***

The Project Site is located in an urbanized area and is not located in a Very High Fire Hazard Severity Zone,<sup>19</sup> or within a City-designated Fire Buffer Zone.<sup>20</sup> The Project would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, no impact regarding this topic would occur.

**k) Hydrology and Water Quality**

***a) The Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.***

Construction activities associated with the Project can potentially degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as runoff from demolition equipment. The Project would comply with the requirements set forth by the Los Angeles Regional Water Quality Control Board (LARWQCB) and contained in LAMC Chapter IX, Division 70, which addresses erosion control during grading and excavation, and LAMC Chapter IX, Article 1. By complying with the applicable regulations mentioned above, the Project's construction activities would not result in erosion. Therefore, the Project would not result in contaminated surface water runoff, and the Project's potential water quality impacts during demolition would be less than significant.

After completion of the construction activities, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt and the existing surface parking lot would remain. The Project Site would be left undisturbed with no human activity that would entrain dust. The Project Site would be fenced, and would include a landscape buffer planted along the fence, consistent with the requirements of the San Vicente Scenic Corridor Specific Plan. Therefore, the Project Site would be more pervious after the completion of demolition than compared to existing conditions, which would reduce the amount of runoff as compared to existing conditions. Further, while the surface parking would remain on the Project Site, it would not be used for parking and therefore would not result in contaminated runoff from vehicles parked on the Project Site. As such, the Project would not substantially degrade surface water quality.

Based on the limited timeframe for construction (approximately 37 working days), the small size of the Project Site, and the additional pervious area on the Project Site after demolition, the Project would not be expected to substantially degrade surface or ground water quality and impacts would be less than significant.

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<sup>19</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

<sup>20</sup> City of Los Angeles, Safety Element of the Los Angeles General Plan, November 26, 1996, Exhibit D.

***b) The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.***

Groundwater was not encountered in the on-site borings drilled to a maximum feet depth of almost 31 feet. The Project would require removal of the existing underground utilities, which are located at a maximum depth of five feet. Therefore, the Project would not require dewatering during demolition activities. Currently, the entire Project Site is impervious with the exception of planters in the courtyard of the Barry Building. Therefore, the existing groundwater recharge occurring on-site is negligible. With implementation of the Project, the portion of the Project Site that contains the Barry Building would be permeable after the demolition of the existing building. After demolition, the Project Site would still not serve as a groundwater recharge area as the soil would only be able to absorb so much water until it becomes saturated. The Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Therefore, Project impacts to groundwater would be less than significant.

***c.i) The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.***

No natural watercourses exist on or in the vicinity of the Project Site, and runoff currently flows unfiltered toward the existing storm drains along San Vicente Boulevard. The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site; the adjacent surface parking lot would not be demolished as part of the Project. No future development of the Project Site is proposed and/or considered as part of the Project. Construction activities would comply with LAMC Chapter IX, Division 70, which addresses erosion control during grading and excavation. Thus, construction activities associated with the Project would not result in substantial erosion and/or siltation on- or off-site.

As described above, the Project consists of the demolition of the existing building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. After the completion of demolition, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt and the existing surface parking lot would remain. The Project Site would be fenced, and would include a landscape buffer planted along the fence, consistent with the requirements of the San Vicente Scenic Corridor Specific Plan. Therefore, the Project would decrease stormwater runoff volume, as the area that contains the existing building would be entirely pervious. As such, the Project would not substantially alter the drainage pattern of the area surrounding the Project Site such that it would result in substantial erosion or siltation on- or off-site and, Project impacts would be less than significant.

***c.ii) The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which***

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

The 0.61-acre Project Site is currently improved with an existing two-story, approximately 13,956 square foot commercial building commonly referred to as the Barry Building and a portion of a surface parking lot. Currently, the entire Project Site is impervious with the exception of planters in the courtyard of the Barry Building, and runoff from the Project Site currently flows unfiltered toward the existing storm drains in San Vicente Boulevard. The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site; the adjacent surface parking lot would not be demolished as part of the Project. No future development of the Project Site is proposed and/or considered as part of the Project. After the completion of demolition, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot and the existing surface parking lot would remain. Therefore, the Project would decrease stormwater runoff volume, as the area that contains the existing building would be entirely pervious. After demolition, the exposed soils would be able to absorb water until they are saturated, at which point runoff would occur similar to the existing conditions. As a portion of the Project Site would be permeable after the completion of the demolition, the Project would reduce the amount of surface runoff. Further, all future run-off would flow towards and be captured by the existing storm drains along San Vicente Boulevard. Therefore, no flooding would occur on- or off-site. Impacts related to surface runoff, including through the alteration of the course of a stream or river or the increase of impervious surface area would therefore be less than significant.

**c.iii) The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.**

As discussed above under Thresholds a) and c.i), the Project would not contribute to runoff water which would provide substantial additional sources of pollution runoff. Further, as discussed under Threshold c.ii), the Project would not substantially increase the rate or amount of surface runoff which would result in on- or off-site flooding, which would occur if the runoff water exceeded the capacity of the existing stormwater drainage system. Therefore, Project impacts would be less than significant.

**c.iv) The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would impede or redirect flood flows.**

The Project Site is not located within 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1590F) or

by the City of Los Angeles.<sup>21</sup> Thus the Project would not impede or redirect flood flows and no impact would occur.

***d) The Project would not risk the release of pollutants in flood hazard, tsunami, or seiche zones.***

According to the City of Los Angeles Bureau of Engineering, the Project Site is located outside of a floodplain,<sup>22</sup> which is defined as any land area susceptible to being inundated by flood waters from any source (including floods, dam/reservoir inundation, coastal storm surge, tsunami, etc.).<sup>23</sup> As the Project Site is not located within a floodplain, there would be no risk of release of pollutants due to Project inundation and no impact would occur. Further, according to Exhibit G of the Safety Element, the Project Site is located outside of an area potentially impacted by a tsunami and outside of a potential inundation area. Therefore, there is no potential for the release of pollutants due to project inundation.<sup>24</sup> For these reasons, no impact would occur.

***e) The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.***

As discussed in response to Threshold a), the Project's impacts with respect to water quality would be less than significant. With respect to groundwater, as discussed above in Threshold b), the Project would not result in impacts related to groundwater recharge or interfere with substantial groundwater management of the basin. Therefore, the Project would not conflict with or obstruction implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

**j) Land Use and Planning**

***a) The Project would not physically divide an established community.***

The 0.61-acre Project Site is currently improved with an existing two-story, approximately 13,956 square foot commercial building commonly referred to as the Barry Building and a portion of a surface parking lot. The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. Once construction activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot, and the existing surface parking lot would remain. No future development of the Project Site is proposed and/or considered as part of the Project. The Project Site is located in an urbanized area with low- to mid-rise buildings that are occupied primarily by commercial and residential land uses. The Project does not contain features such as highways or new

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<sup>21</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

<sup>22</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

<sup>23</sup> City of Los Angeles, Bureau of Engineering, website: <https://eng.lacity.org/faqs>, accessed February 19, 2020.

<sup>24</sup> Safety Element of the City of Los Angeles General Plan, Exhibit G, 1996.

infrastructure that would cause a permanent disruption in the physical arrangement of the surrounding uses. Therefore, no impact would occur.

### **k) Mineral Resources**

***a) The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.***

The Project Site is not located within a City-designated oil field or oil drilling area,<sup>25</sup> or a City-designation Mineral Resource Zone 2 Area (MRZ-2),<sup>26</sup> and is currently improved with an existing two-story, approximately 13,956 square foot commercial building commonly referred to as the Barry Building and a portion of a surface parking lot. Demolition of the existing building and the installation of a landscape buffer along the southern boundary of the Project Site would have no impact with respect to loss of availability of a known regionally-important mineral resource.

***b) The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.***

The Project Site is not located within a City-designated Mineral Resource Zone<sup>27</sup> where significant mineral deposits are known to be present, and the area surrounding the Project Site has been developed with structures and is inaccessible for mining extraction. Demolition of the existing commercial building would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact would occur.

### **l) Noise**

***c) The Project is not located within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport or public use airport.***

The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. Santa Monica Airport is located approximately three miles southeast of the Project Site. Further, there are no private airstrips in the vicinity of the Project Site. Therefore, no impact would occur.

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<sup>25</sup> State of California, Department of Conservation, Division of Oil, Gas & Geothermal Resources Well Finder: <http://maps.conservation.ca.gov/doggr/index.html#close>, accessed February 13, 2020.

<sup>26</sup> City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.

<sup>27</sup> City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.

## m) Population and Housing

### ***a) The Project would not induce substantial unplanned population growth in an area, either directly or indirectly.***

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot, and the existing surface parking lot would remain. No future development of the Project Site is proposed and/or considered as part of the Project. The construction activities would occur over approximately 37 working days and would require approximately 10 construction workers during any given day. The patterns of construction workers in Southern California are such that it is not likely that the workers for the Project would relocate their households as a consequence of being employed to conduct the Project's demolition work. The construction industry differs from most other industry sectors in several ways: (1) there is no regular place of work; (2) many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills; and (3) the work requirements for most construction project are highly specialized. The Project-related construction activities would not represent a permanent or substantial new employment generator that would result in substantial unplanned population growth either directly or indirectly, and no impact would occur.

### ***b) The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.***

The 0.61-acre Project Site is currently improved with an existing two-story, approximately 13,956 square foot commercial building commonly referred to as the Barry Building and a portion of a surface parking lot. The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. The existing building is a commercial use that has been vacant and fenced since 2017. Thus, the Project would not displace any housing or residents, as there is no housing on the Project Site. Therefore, no impact would occur.

## n) Public Services

### ***a) The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.***

The Project's proposed construction activities would result in a minimal amount of traffic (including from workers and trucks hauling debris) over the course of the approximately 37 working day construction period. Further, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear

a path of travel and driving in the lanes of opposing traffic. As such, the limited amount of traffic during construction would have a negligible effect with respect to fire response vehicles.

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services and cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. Construction activities would be required to comply with all applicable federal, state, and city regulations related to fire safety, including federal regulations under the Occupational Safety and Health Acts (29 Code of Federal Regulations, Part 1926 Subpart F), the California Building Code (California Code of Regulations, Title 24), and the City's Fire Code (LAMC Chapter V, Article 7). To comply with Cal-OSHA and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.<sup>28</sup> Additionally, construction activities would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. city and state regulations and code requirements would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project demolition activities to expose people to the risk of fire or explosion related hazardous materials and non-hazardous combustion materials.

The Project would be primarily served by Fire Station No. 19, which is located at 12229 Sunset Boulevard, approximately 0.7-mile northwest of the Project Site. In addition, Fire Station Nos. 37 and 59 are also in the vicinity of the Project Site (approximately 1.4 miles and 2.3 miles from the Project Site, respectively) and would be available for fire protection services. Based on the proximity of the Project Site to Fire Station No. 19, the Project would meet the response distance requirements of the LAFD.

Based on the above, Project demolition activities would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain acceptable fire protection services. Therefore, impacts associated with construction of the Project on fire protection services would be less than significant.

As stated above, no future development of the Project Site is proposed and/or considered as part of the Project. Thus, operational impact to fire protection facilities would be less than significant.

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<sup>28</sup> California Code of Regulations, Subchapter 4 Construction Safety Orders, Article 36 Fire Protection and Prevention, <https://www.dir.ca.gov/title8/1920.html>, accessed July 2, 2020.

***b) The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.***

The Project's proposed construction activities would result in a minimal amount of traffic (including from workers and trucks hauling debris) over the course of the approximately 37 working day construction period. Further, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. As such, the limited amount of traffic during construction would have a negligible effect with respect to police response vehicles.

The Project Site is served by the West Los Angeles Community Police Station located at 1663 Butler Avenue, which is approximately 1.6 miles southeast of the Project Site. Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Prior to construction, pursuant to LADBS procedures, LADBS must approve plans for protection fences and canopies. The security fences will minimize the need for Los Angeles Police Department (LAPD) services and prevent trespassing and theft during construction activities. Thus, potential impacts associated with theft and vandalism during demolition activities would be less than significant. Overall, during demolition, Project impacts would be less than significant.

Based on the above, Project construction activities would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain acceptable police protection services. Therefore, impacts associated with construction of the Project on police protection services would be less than significant.

As stated above, no future development of the Project Site is proposed and/or considered as part of the Project. After the existing building has been demolished, LADBS procedures also require an 8-foot chain link fence to border the Project Site to prevent unauthorized entry to the vacant lot. Thus, operational impact to police protection facilities as a result of the Project would be less than significant.

***c) The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools.***

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. The Project construction would be temporary in nature, lasting for approximately 37 working days, and would employ approximately 10 construction workers during any given day on the Project Site. The patterns of construction

workers in Southern California are such that it is not likely that the workers for the Project would relocate their households as a consequence of the Project's construction activities. Therefore, the Project would not include any employment or population growth that would require the addition of a new school or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain acceptable school facilities, and no impact would occur.

As stated above, no future development of the Project Site is proposed and/or considered as part of the Project. Thus, there would be no operational impact to educational facilities as a result of the Project. Therefore, operational Project impacts would be less than significant.

***d) The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks.***

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. The Project construction would be temporary in nature, lasting for approximately 37 working days, and would employ approximately 10 construction workers during any given day on the Project Site. The patterns of construction workers in Southern California are such that it is not likely that the workers for the Project would relocate their households as a consequence of the Project's construction activities. The Project-related construction would not represent a permanent or substantial new employment generator that would result in population growth that would require the addition of a new park or recreation facility or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain acceptable recreation facilities. Therefore, the Project would not include any population growth that would generate a demand for recreational and park facilities, and no impact would occur.

As stated above, no future development of the Project Site is proposed and/or considered as part of the Project. Thus, there would be no operational impact to recreational facilities as a result of the Project. Therefore, operational Project impacts would be less than significant.

***e) The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities.***

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. The Project construction would be temporary in nature, lasting for approximately 37 working days, and would employ approximately 10 construction workers during any given day on the Project Site. The patterns of construction workers in Southern California are such that it is not likely that the workers for the Project would

relocate their households as a consequence of the Project's construction work. The Project-related construction would not represent a permanent or substantial new employment generator that would require the addition of a new library or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain acceptable library facilities. Therefore, the Project would not include any population growth that would generate a demand for library facilities, and no impact would occur.

As stated above, no future development of the Project Site is proposed and/or considered as part of the Project. Thus, there would be no operational impact to library facilities as a result of the Project. Therefore, operational Project impacts would be less than significant.

### **o) Recreation**

***a) The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.***

As analyzed above under Threshold XV(d), construction workers are more likely to use recreational facilities near their places of residence and the Project construction activities would not represent a permanent or substantial new employment generator that would result in permanent population growth that would impact recreational and park facilities. Thus, the Project construction activities would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and no impact would occur.

As stated above, no future development of the Project Site is proposed and/or considered as part of the Project. Thus, there would be no operational impact to recreational facilities as a result of the Project. Therefore, operational Project impacts would be less than significant.

***b) The Project does not include recreational facilities and would not require the construction or expansion of recreational facilities that would have an adverse physical effect on the environment.***

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. Therefore, the Project would not introduce any uses to the Project Site that would require access to park facilities. After construction activities are completed, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot and the existing surface parking lot would remain. The Project does not include any recreation facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and no impact would occur.

## **p) Transportation**

### ***a) The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.***

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. Therefore, the Project is not required to make any modifications to the public right-of-way, nor is the Project proposing any modifications to the public right-of-way. In addition, the Project would not generate any traffic and would not conflict with any transportation plan, policy, or program adopted to support multi-modal transportation options or public safety. Further, while the Project would require a discretionary approval, it would not require the decision maker to find that the decision substantially conforms to the purpose, intent, and provisions of the General Plan. Therefore, in compliance with LADOT's Transportation Assessment Guidelines (TAG) (July 2020), the Project would not require further analysis to assess whether the Project would conflict with plans, programs, ordinances, or policies, and no impact would occur.

### ***b) The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).***

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. Therefore, the Project would not result in any daily vehicle trips, nor would the Project result in a net increase in daily VMT, and no impact would occur.

### ***c) The Project would substantially increase hazards due to a geometric design feature or incompatible uses.***

The Project does not include any geometric design features or incompatible uses and the demolition plans would be reviewed by LADBS and LAFD during the City's plan review process to ensure all applicable safety requirements are met. The roadways adjacent to the Project Site are part of the existing roadway network and contain no sharp curves or dangerous intersections. In addition, development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. No new driveways are proposed, and once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot and the existing surface parking lot would remain. The Project Site would be fenced, and a landscape buffer would be planted along the fence within 30 days after demolition, consistent with the requirements of the San Vicente Scenic Corridor Specific Plan. Therefore, no impact with respect to hazardous design features would occur.

## q) Utilities and Service Systems

***a) The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.***

During construction, limited water (for dust control activities) and electricity resources would be required. Demolition and construction activities typically do not involve the consumption of natural gas, the need for telecommunications infrastructure, or result in the generation of wastewater that would need to be treated by wastewater treatment infrastructure that serves the Project Site.

Upon completion of the construction activities, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot and the existing surface parking lot would remain. The Project Site would be fenced, and would include a landscape buffer planted along the fence, consistent with the requirements of the San Vicente Scenic Corridor Specific Plan. The Project Site would therefore not require electricity, natural gas, or telecommunications capabilities, nor would the Project generate wastewater or increase storm water drainage. The Project would require a limited amount of water to water the landscape buffer, and the water would be supplied via available connections in San Vicente Boulevard. Therefore, the Project would not require or result in the relocation or construction of new or expanded facilities, the construction of which could cause significant environmental effects, and no impact would occur.

***b) There would be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.***

The Project would require a limited amount of water for dust control during demolition activities. Based on a ratio of 3,020 gallons of water/acre/day,<sup>29</sup> the Project would require approximately 1,842 gallons of water (0.0056 acre feet) per day during demolition.<sup>30</sup> The Los Angeles Department of Water and Power (LADWP), through its Urban Water Management Plan (Exhibit 11B), anticipates its projected water supplies will meet demand through the year 2035 for a single dry year, multiple dry years, and an average (normal) weather year. In 2020, LADWP estimates that the available water supply in 2020 (for an average weather year) would be approximately 611,800 acre feet. The Project would not require any water beyond the demolition period, with the exception of a limited amount of water to water the landscape buffer planted along the fence. Therefore, LADWP would be able to supply water for the Project's demolition activities based on its existing supply. Based on the limited amount of water required during the demolition activities, no impact with respect to water supply would occur.

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<sup>29</sup> Air & Waste Management Association, Air Pollution Engineering Manual, 1992 Edition.

<sup>30</sup> This is a conservative estimate, as dust control activities would not be required for the entirety of the Project Site (as the existing parking lot would remain) and may not occur on every day of Project activities.

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

The Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project, which has been vacant since 2017. Any wastewater generated during demolition activities would be accommodated by portable restrooms and not by the existing wastewater infrastructure that serves the Project Site. Therefore, the Project would not result in the generation of any wastewater, and therefore would not affect the capacity of facilities that serve the Project Site. As such, no impact would occur.

***d) The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.***

The Project involves the demolition of the existing commercial building, which is expected to generate a total of approximately 4,174 cy of debris (or 5,843,500 pounds or 2,922 tons), including 130 cubic yards of asbestos-containing material and 4,044 cubic yards of non-contaminated debris. The 130 cubic yards of asbestos-containing material would be entirely disposed of at the Azusa Land Reclamation Facility. Compliance with SB 1374 would require the recycling or salvaging of 75 percent of the remaining 4,044 cubic yards of debris. This would equate to approximately 1,011 cubic yards (or 404,400 pounds or 202 tons) that would be disposed of at a landfill over the course of the demolition activities.<sup>31</sup> Because of the recycling of most of the solid waste generated by the construction of the Project, short-term construction impacts to landfills and solid waste services would be less than significant.

Overall, there is sufficient landfill capacity to accommodate the solid waste generated by the demolition of the existing building, and impacts would be less than significant.

***e) The Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.***

The Project would comply with the applicable regulations associated with solid waste, including AB 939 and SB 1374. Since the Project would comply with federal, state, and local statutes and regulations related to solid waste, and no impact would occur.

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<sup>31</sup> The conversion of cubic yards to pounds is based on rates provided by CalRecycle (<https://www.calrecycle.ca.gov/swfacilities/cdi/tools/calculations>) and assumes an average of 400 pounds per cubic yard.

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## r) Wildfire

**a) The Project is not located in or near a state responsibility area or land classified as a very high fire hazard severity zone, and would not substantially impair an adopted emergency response plan or emergency evacuation plan.**

**b) The Project is not located in or near a state responsibility area or land classified as a very high fire hazard severity zone, and would not exacerbate wildfire risks due to slope, prevailing winds, and other factors.**

**c) The Project is not located in or near a state responsibility area or land classified as a very high fire hazard severity zone, and would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk.**

**d) The Project is not located in or near a state responsibility area or land classified as a very high fire hazard severity zone, and would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.**

The Project Site is not located in or near a state responsibility area, within a City- designated Very High Fire Hazard Severity Zone,<sup>32</sup> or within a City-designated buffer zone.<sup>33</sup> Therefore, no impact regarding these topics would occur.

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<sup>32</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

<sup>33</sup> City of Los Angeles, Safety Element of the Los Angeles General Plan, November 26, 1996, Exhibit D.