

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

HELEN LEUNG

KAREN MACK

DANA M. PERLMAN

YVETTE LOPEZ-LEDESMA

JENNA HORNSTOCK

RENEE DAKE-WILSON

VACANT

**CITY OF LOS ANGELES
CALIFORNIA**



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

VACANT
DEPUTY DIRECTOR

Revello Drive and Tramonto Drive Residential Project

Case Number: ENV-2019-5520-MND

Project Location:

17538, 17544, 17550 Tramonto Drive, Los Angeles, CA 90272 (Springhouse Hamilton Park, LLC "SHP House 1"); Case Number DIR-2019-6352-CDP-MEL

17532, 17540, 17548 Revello Drive, Los Angeles, CA 90272 (Springhouse Hamilton Park, LLC, "SHP House 2"); Case Number DIR-2019-5524-CDP-MEL and ZA-2019-5525-ZAD

17523, 17529 Revello Drive, Los Angeles, CA 90272 (JDR Revello, LLC "JDR House 1"); Case Number DIR-2019-5571-CDP-MEL and ZA-2019-5574-ZAD

17533, 17537, 17541, 17547 Revello Drive, Los Angeles CA 90272 (JDR Revello, LLC, "JDR House 2"); Case Number DIR-2019-5584-CDP-MEL and ZA-2019-5585-ZAD

Community Plan Area: Brentwood-Pacific Palisades

Council District: 11 –Bonin

Project Description:

The Project involves the construction of four new single-family residences, as summarized below, on a total development site of 1.35 acre consisting of 12 contiguous parcels.

1. SHP House 1

A new 9,051 square-foot single family residence (with an additional 5,887 square-foot basement) would be located at 17538, 17544, 17550 Tramonto Drive, three vacant lots with a lot area of approximately 24,656 square feet. SHP House 1 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements, trellises, and an Accessory Dwelling Unit (ADU).

July 2021

2. **SHP House 2**
A 4,160 square-foot single family residence (with an additional 5,096 square-foot basement), would be located at 17532, 17540, 17548 Revello Drive, three vacant lots with a lot area of approximately 11,503 square feet. SHP House 2 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises.
3. **JDR House 1**
A 2,619 square-foot single family residence (with an additional 2,428 square-foot basement) would be located at 17523, 17529 Revello Drive, two vacant lots with a lot area of approximately 8,258 square feet. JDR House 1 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises.
4. **JDR House 2**
Lastly, a 6,078 square-foot single family residence (with an additional 7,949 square-foot basement) would be located at 17533, 17537, 17541, 17547 Revello Drive, four vacant lots with a lot area of approximately 16,329 square feet. JDR House 2 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises.

SHP Houses 1 and 2 would be owned by Springhouse Hamilton Park, LLC, while JDR Houses 1 and 2 would be owned by JDR Revello, LLC.

Total grading for the Project, including that required for offsite street improvements, is approximately 29,148 cubic yards (CY), of which 28,341 CY would be remedial grading and approximately 33,794 CY would be exported/transported from the Project site.

Additionally, the Project proposes to include an approximately 200-foot extension of Revello Drive to the west from the easterly terminus of the existing roadway to provide vehicular access to the three proposed residences fronting Revello Drive. Additionally, a turnaround will be proposed per LAFD regulations and design standards.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Dudek

APPLICANT:

Demos Development, Inc.

INITIAL STUDY

TABLE OF CONTENTS

	<u>Page</u>
Revello Drive and Tramonto Drive Residential Project.....	1
1 Introduction	5
1.1 Purpose of an Initial Study	5
1.2 Organization of the Initial Study	5
2 Executive Summary	7
3 Project Description	15
3.1 Project Summary	15
3.2 Environmental Setting.....	16
3.2.1 Project Location	16
3.2.2 Existing Conditions.....	16
3.2.3 Surrounding Land Uses	17
3.3 Description of Project.....	17
3.3.1 Project Overview	17
3.3.2 Design and Architecture	20
3.3.3 Open Space and Landscaping	20
3.3.4 Access, Circulation, and Parking.....	20
3.3.5 Sustainability Features	20
3.3.6 Anticipated Construction Schedule	21
3.4 Requested Permits and Approvals	21
4 Environmental Impact Analysis.....	53
I. Aesthetics	53
II. Agriculture and Forestry Resources	57
III. Air Quality	59
IV. Biological Resources	67
V. Cultural Resources	73
VI. Energy	76
VII. Geology and Soils.....	79
VIII. Greenhouse Gas Emissions	85
IX. Hazards and Hazardous Materials.....	89
X. Hydrology and Water Quality	95
XI. Land Use and Planning.....	101
XII. Mineral Resources	104
XIII. Noise	105
XIV. Population and Housing.....	110
XV. Public Services	112
XVI. Recreation	115
XVII. Transportation.....	116
XVIII. Tribal Cultural Resources	120
XIX. Utilities and Service Systems.....	122
XX. Wildfire	127
XXI. Mandatory Findings of Significance	129
5 Preparers and Persons Consulted	139

6	References, Acronyms and Abbreviations	141
6.1	References Cited	141
6.2	Acronyms and Abbreviations	146

List of Figures

1	Project Location	23
2	Surrounding Land Uses	25
3	General Plan Land Use.....	27
4	Zoning.....	29
5	Project Site Plan	31
6	SHP House 1 - Site Plan.....	33
7	SHP House 2- Site Plan.....	35
8	JDR House 1- Site Plan	37
9	JDR House 2 - Site Plan	39
10	SHP House 1 - Architectural Elevations.....	41
11	SHP House 2 - Architectural Elevations.....	43
12	JDR House 1 - Architectural Elevations	45
13	JDR House 2 - Architectural Elevations	47
14	Related Projects.....	49
15	Noise Measurement Location	51

List of Tables

1	Project Components	16
2	Residential and Basement Floor Areas.....	19
3	Construction Details	19
4	SCAQMD Air Quality Significance Thresholds.....	61
5	Regional Criteria Pollutant Emissions	62
6	Cumulative Localized Criteria Pollutant Emissions Impacts.....	63
7	Localized Criteria Pollutant Impacts.....	65
8	Project Construction Greenhouse Gas Emissions	86
9	Ambient Noise Levels – dBA.....	106
10	Construction Noise Impacts – dBA	107

Appendices

A	Air Quality and Noise Impact Assessment
B	Biological Resource Letter Report
C	Arborist Reports
D	Preliminary Landscape Plans
E	Cultural Resources Report
F	The City of Los Angeles Department of Building and Safety, Grading Division Approval Letter
G	Hydrology and Hydraulics Report
H	Traffic Management Plan
I	VTM Outputs
J	Mitigation Monitoring Program

INITIAL STUDY

1 Introduction

This Initial Study (IS) document evaluates potential environmental effects resulting from construction and operation of the proposed Revello Drive and Tramonto Drive Residential Project (“Project”). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will result in significant impacts on the environment that would be reduced to a less than significant level with mitigation incorporated. This Initial Study and Mitigated Negative Declaration are intended as informational documents and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An application for the proposed project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required.

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

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

INITIAL STUDY

2 Executive Summary

PROJECT TITLE	REVELLO DRIVE AND TRAMONTO DRIVE RESIDENTIAL PROJECT
ENVIRONMENTAL CASE NO.	ENV- 2019-5520-MND
RELATED CASES	DIR-2019-5584-CDP-MEL, ZA-2019-5585-ZAD; DIR-2019-6352-CDP-MEL; DIR-2019-5571-CDP-MEL, ZA-2019-5574-ZAD; DIR-2019-5524-CDP-MEL, ZA-2019-5525-ZAD

PROJECT LOCATION	17538, 17544, 17550 TRAMONTO DRIVE 17523, 17529 REVELLO DRIVE 17532, 17540, 17548 REVELLO DRIVE 17533, 17537, 17541, 17547 REVELLO DRIVE LOS ANGELES, CA 90272
COMMUNITY PLAN AREA	BRENTWOOD-PACIFIC PALISADES
GENERAL PLAN DESIGNATION	LOW RESIDENTIAL
ZONING	R1-1
COUNCIL DISTRICT	11

LEAD AGENCY	City of Los Angeles
STAFF CONTACT	MAKAN BARANGHOORI
ADDRESS	200 NORTH SPRING STREET, ROOM 721 LOS ANGELES, CA. 90012
PHONE NUMBER	(213) 978-1148
EMAIL	MAKAN.BARANGHOORI@LACITY.ORG

APPLICANT	DEMOS DEVELOPMENT, INC.
ADDRESS	P.O. BOX 1440 SANTA MONICA, CALIFORNIA 90406
PHONE NUMBER	646.265.5158

PROJECT DESCRIPTION

The Project involves the construction of four new single-family residences, as summarized below, on a total development site of 1.35 acre consisting of 12 contiguous parcels.

1. **SHP House 1**
A new 9,051 square-foot single family residence (with an additional 5,887 square-foot basement) would be located at 17538, 17544, 17550 Tramonto Drive, three vacant lots with a lot area of approximately 24,656 square feet. SHP House 1 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements, trellises, and an Accessory Dwelling Unit (ADU).
2. **SHP House 2**
A 4,160 square-foot single family residence (with an additional 5,096 square-foot basement), would be located at 17532, 17540, 17548 Revello Drive, three vacant lots with a lot area of approximately 11,503 square feet. SHP House 2 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises.
3. **JDR House 1**
A 2,619 square-foot single family residence (with an additional 2,428 square-foot basement) would be located at 17523, 17529 Revello Drive, two vacant lots with a lot area of approximately 8,258 square feet. JDR House 1 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises.
4. **JDR House 2**
Lastly, a 6,078 square-foot single family residence (with an additional 7,949 square-foot basement) would be located at 17533, 17537, 17541, 17547 Revello Drive, four vacant lots with a lot area of approximately 16,329 square feet. JDR House 2 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises.

SHP Houses 1 and 2 would be owned by Springhouse Hamilton Park, LLC, while JDR Houses 1 and 2 would be owned by JDR Revello, LLC.

Total grading for the Project, including that required for offsite street improvements, is approximately 29,148 cubic yards (CY), of which 28,341 CY would be remedial grading and approximately 33,794 CY would be exported/transported from the Project site.

Additionally, the Project proposes to include an approximately 200-foot extension of Revello Drive to the west from the easterly terminus of the existing roadway to provide vehicular access to the three proposed residences fronting Revello Drive. Additionally, a turnaround will be proposed per LAFD regulations and design standards.

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

ENVIRONMENTAL SETTING

The Project site is located approximately 390 feet north of the Pacific Coast Highway (PCH), 0.39 miles southeast of the Getty Villa, 0.37 miles southwest of Santa Ynez Lake, and 0.2 miles west of Sunset Boulevard. Regional access to the Project site is provided by Los Liones Drive, Sunset Boulevard, and Pacific Coast Highway (State Route 1). In the vicinity of the Project site, Pacific Coast Highway runs east to west and is located south of the Project site. Local access is primarily provided by the street system surrounding the Project site (Figure 1, Project Location). The Project consists of 12 parcels and 12 addresses. The addresses and associated Assessor's Parcel Numbers (APNs) are outlined in the table below.

House No.	APN	Address	Lot Size
SHP House 1	4416021060	17538 Tramonto Drive	7756.1 sf
	4416021016	17544 Tramonto Drive	7041.9 sf
	4416021015	17550 Tramonto Drive	7767.6 sf
SHP House 2	4416011003	17548 Revello Drive	3753.9 sf
	4416011004	17540 Revello Drive	4094.6 sf
	4416011006	17532 Revello Drive	3725.2 sf
JDR House 1	4416021008	17523 Revello Drive	4175.6 sf
	4416021007	17529 Revello Drive	4063.8 sf
JDR House 2	4416021006	17533 Revello Drive	3947.8 sf
	4416021005	17537 Revello Drive	4667.9 sf
	4416021004	17541 Revello Drive	3750.4 sf
	4416021003	17547 Revello Drive	3933.3 sf

The Project site is currently undeveloped. From Tramonto Drive, the Project site slopes downward to the south, towards Revello Drive. The Project site is located approximately 290 feet above mean sea level (AMSL) at its highest point, within the northern portion of the site, and approximately 165 feet AMSL at its lowest point, along the southern boundary of the site.

The Project is located within an urbanized area of the City of Los Angeles (City) and is generally surrounded by single-family residential properties in the Pacific Palisades neighborhood. The Project site is located adjacent to single-family residences to the north and northeast and vacant parcels to the south, west, and southeast. The Project site is bordered to the north by Tramonto Drive, which is accessible to vehicles, to the south and west by open space, and to the east by the terminus of Revello Drive (Figure 2, Surrounding Land Uses). This roadway, scheduled to be a 20-foot wide roadway, would be continued as part of the Project to provide access to SHP House 2, JDR House 1, and JDR House 2 approximately 200 feet to the west.

As shown in Figure 3, General Plan Land Use, the Project site is designated by the Brentwood-Pacific Palisades Community Plan as Low Residential (City of Los Angeles 2006). The Project site is zoned R1-1 (City of Los Angeles 2020a).

The subject lots are located within the original development of the Castellammare Area in the Pacific Palisades, dating back to the early 1920's. At that time a series of roads were cut into the hillside traversing in an essentially northwest-southeast orientation. Double-loaded lots were developed and homes were built intermittently. In 1936, 3.2 acres failed as a moderately deep slump landslide, extending onto former Roosevelt Highway (current PCH) from upslope at

Tramonto Drive. The Tramonto Landslide is reported to have periodically reactivated and enlarged to the west and east, ultimately truncating and closing a portion of Castellammare Drive, Posetano Road, Revello Drive, and Tramonto Drive by 1959. No development or street reconstruction has occurred within the limits of the failure, except for the bulkhead shoring wall at the failure headscarp restoring Tramonto Drive in 1969 (further reinforced in 1981) and the reconnection of an above grade storm drain system along the eastern slide margin which is briefly discussed above. Outside of the failure area to the north, west, and east, sporadic new development occurred and filled in throughout the community over the decades. The subject property is located primarily on the central/eastern portion of the landslide. Approximately 200 feet of the unimproved portion of Revello Drive that was affected by these slides would be improved. This improvement will provide access to the three residences that have frontage along Revello Drive.

Drainage from water runoff onto the existing portion of Revello to the east and upstream of the site is currently captured by an inlet structure in front of 17526 Revello and conveyed into the main line under the PCH through an above ground 24" corrugated metal pipe or CMP. After the approximate 200-foot improvement of Revello Drive, the proposed project will direct any water runoff from the proposed three residences along Revello Drive to this existing storm drain inlet and cooperate with the Bureau of Engineering to design said improvements in accordance with their regulations and standards.

All residences would be located in an area zoned R1-1 and within a Hillside Area Regulations zone. The Project site is located within Zoning Information (ZI) – 2462, also known as an area subject to modifications to single-family zones and single-family zone hillside area regulations (City of Los Angeles 2020b). Per the requirements of ZI-2462, the Project would be required to comply with grading and hauling regulations in hillside areas, including allowable grading and import/export quantities (City of Los Angeles 2017).

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Makan Baranghoori

PRINTED NAME



SIGNATURE

Planning Assistant

TITLE

08/12/2021

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

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

- 9) The explanation of each issue should identify:
- a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

Additionally, the Project proposes to include an approximately 200-foot extension of Revello Drive to the west from the easterly terminus of the existing roadway to provide vehicular access to the three proposed residences fronting Revello Drive. Additionally, a turnaround will be proposed per LAFD regulations and design standards.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project is located within the Brentwood-Pacific Palisades Community Plan Area of the City. Generally, the Project site is located within the urban, residential neighborhood of Pacific Palisades, as shown in Figure 2. The Brentwood-Pacific Palisades Community Plan area is bordered by the neighborhoods of Canoga Park, Winnetka, Woodland Hills and West Hills to the northwest, the neighborhoods of Encino and Tarzana to the north, and the neighborhood Sherman Oaks, Studio City, Toluca Lake and Cahuenga Pass to the northeast, and Bel Air, Beverly Crest, West Los Angeles, and Westwood to the east. The City of Malibu is located west of the Brentwood-Pacific Palisades Community Plan area.

Specifically, the Project site consists of 12 contiguous lots as shown in Table 1 below.

TABLE 1. PROJECT COMPONENTS

House No.	APN	Address	Lot Size
SHP House 1	4416021060	17538 Tramonto Drive	7756.1 sf
	4416021016	17544 Tramonto Drive	7041.9 sf
	4416021015	17550 Tramonto Drive	7767.6 sf
SHP House 2	4416011003	17548 Revello Drive	3753.9 sf
	4416011004	17540 Revello Drive	4094.6 sf
	4416011006	17532 Revello Drive	3725.2 sf
JDR House 1	4416021008	17523 Revello Drive	4175.6 sf
	4416021007	17529 Revello Drive	4063.8 sf
JDR House 2	4416021006	17533 Revello Drive	3947.8 sf
	4416021005	17537 Revello Drive	4667.9 sf
	4416021004	17541 Revello Drive	3750.4 sf
	4416021003	17547 Revello Drive	3933.3 sf

The Project site is approximately 390 feet north of the Pacific Coast Highway (PCH), 0.39 miles southeast of the Getty Villa, 0.37 miles southwest of Santa Ynez Lake, and 0.2 miles west of Sunset Boulevard. Regional access to the Project site is provided by Los Liones Drive, Sunset Boulevard, and Pacific Coast Highway (State Route 1). In the vicinity of the Project site, Pacific Coast Highway runs east to west and is located south of the Project site. Local access is primarily provided by the street system surrounding the Project site.

3.2.2 Existing Conditions

As discussed above, the Project is located within the Brentwood-Pacific Palisades Community Plan Area. The intent of the Brentwood-Pacific Palisades Community Plan is to promote an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health safety, welfare, and conveniences of the people who live and work in the community. Through the Brentwood-Pacific Palisades Community Plan, the City

can inform these groups of its goals, policies, and development standards, thereby communicating what is expected of the City government and private sector to meet its objectives.

The Project site has a General Plan land use designation of Low Residential and is zoned R1-1 (City of Los Angeles 2020a). The Project site is designated Low Residential under the Brentwood-Pacific Palisades Community Plan (City of Los Angeles 2006). The corresponding zone for this designation is R1, which is consistent with the Project site's existing zoning. The last comprehensive update of the Brentwood-Pacific Palisades Community Plan was completed in 1996.

The Project site is currently zoned R1-1 (see Figure 4, Zoning). As such, the Project site is subject to the requirements of the Los Angeles Municipal Code (LAMC) Section 12.08, "R1" One-Family Zone. Per Section 12.08 of the LAMC, the R1 zoning allows for one-family dwellings; parks, playgrounds, or community centers, owned and operated by a government agency; truck gardening; two-family dwellings; accessory buildings; accessory uses; name plates and signs; and backyard beekeeping. The R1 Zone has a minimum lot width of 50 feet and minimum area of 5,000 square feet. The maximum allowable Residential Floor Area (RFA) for lots in the Hillside Area is determined based on the slope band. For lots outside the Hillside Area or Coastal Zone, the maximum RFA is 45% of the lot area (City of Los Angeles 2020b).

The 1.35-acre Project site consists of 12 parcels and 12 addresses, as shown in Table 2, above. The Project site is currently undeveloped. From Tramonto Drive, the Project site slopes downward to the south towards Revello Drive. The Project site is located approximately 290 feet above mean sea level (AMSL) at its highest point, along the northern boundary of the site, and 165 feet AMSL at its lowest point, along the southern boundary of the Project site.

3.2.3 Surrounding Land Uses

As shown in Figure 2, the Project is located within an urbanized, residential area of the City and is generally surrounded by single-family residential properties in the Pacific Palisades neighborhood. The Project site is located adjacent to single-family residences to the north and northeast and vacant parcels to the south, west, and southeast. The Project site is bordered to the north by Tramonto Drive, which is accessible to vehicles, and open space to the south. Revello Drive currently ends at the southeastern portion of the site. This roadway would be continued as part of the Project to provide access to SHP House 2, JDR House 1, and JDR House 2.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project involves the construction of four new single-family residences, as summarized below on a total development site of 1.35 acre that consists of 12 contiguous parcels.

1. SHP House 1

A new 9,051 square-foot single family residence (with an additional 5,887 square-foot basement) would be located at 17538, 17544, 17550 Tramonto Drive, three vacant lots with a lot area of approximately 24,656 square feet (see Figure 6, SHP House 1 -- Site Plan). SHP House 1 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements, trellises, and an Accessory Dwelling Unit (ADU). The new single-family dwelling would include approximately 100 piles, approximately 11,508 CY of total onsite

and offsite grading, of which 11,064 CY would be remedial grading, and 13,318 CY of export (which includes an allowance amount for the expansion of soil).

2. SHP House 2

A 4,160 square-foot single family residence (with an additional 5,096 square-foot basement), would be located at 17532, 17540, 17548 Revello Drive, three vacant lots with a lot area of approximately 11,503 square feet (see Figure 7, SHP House 2 -- Site Plan). SHP House 2 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises. The new single-family dwelling would include approximately 80 piles, approximately 3,514 CY of total onsite and offsite grading, of which 3,266 CY would be remedial grading, and 3,682 CY of export (which includes an allowance amount for the expansion of soil).

3. JDR House 1

A 2,619 square-foot single family residence (with an additional 2,428 square-foot basement) would be located at 17523, 17529 Revello Drive, two vacant lots with a lot area of approximately 8,258 square feet (see Figure 8, JDR House 1 -- Site Plan). JDR House 1 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises. The new single-family dwelling would include approximately 40 piles, approximately 4,145 CY of total onsite and offsite grading, of which 4,100 CY would be remedial grading, and 4,926 CY of export (which includes an allowance amount for the expansion of soil).

4. JDR House 2

Lastly, a 6,078 square-foot single family residence (with an additional 7,949 square-foot basement) would be located at 17533, 17537, 17541, 17547 Revello Drive, four vacant lots with a lot area of approximately 16,329 square feet (see Figure 9, JDR House 2 -- Site Plan). JDR House 2 would include a new pool/spa with attached garage, decks, two new retaining walls each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises. The new single-family dwelling would include approximately 80 piles, approximately 9,982 CY of total onsite and offsite grading, of which 9,911 CY would be remedial grading, and 11,868 CY of export (which includes an allowance amount for the expansion of soil).

SHP Houses 1 and 2 would be owned by Springhouse Hamilton Park, LLC, while JDR Houses 1 and 2 would be owned by JDR Revello, LLC.

The size of the proposed homes was calculated using residential floor area (RFA) calculations. However, the proposed basements of each residence are exempt from RFA calculations. Table 2 summarizes the RFA and basement floor area for each site.

TABLE 2. RESIDENTIAL AND BASEMENT FLOOR AREAS

House Number	APN	Address	RFA	Basement Floor Area (Exempt from RFA)	No. of Lots	Lot Area
SHP House 1	4416021060 4416021016 4416021015	17538 Tramonto Drive 17544 Tramonto Drive 17550 Tramonto Drive	9,051 sf	5,887 sf	3	24,656 sf
SHP House 2	4416011003 4416011004 4416011006	17548 Revello Drive 17540 Revello Drive 17532 Revello Drive	2,619 sf	2,428 sf	2	8,258 sf
JDR House 1	4416021008 4416021007	17523 Revello Drive 17529 Revello Drive	6,078 sf	7,949 sf	4	16,329 sf
JDR House 2	4416021006 4416021005 4416021004 4416021003	17533 Revello Drive 17537 Revello Drive 17541 Revello Drive 17547 Revello Drive	4,160 sf	5,096 sf	3	11,503 sf

In all construction would result in the installation of 315 piles and a total of 29,148 CY of on- and off-site grading, as detailed in Table 3, Construction Details, below.

TABLE 3. CONSTRUCTION DETAILS

Project Component	Lot Area (SF)	No. of Pilings	Grading Quantities (CY)
SHP House No. 1	24,656	100	11,128
SHP House No. 2	8,258	80	3472
JDR House No. 1	16,329	40	4103
JDR House No. 2	11,503	86	9940
Off-Site Improvements	N/A	9	505
TOTALS	60,746	315	29,148

Additionally, the Project proposes to include an approximately 200-foot extension of Revello Drive to the west from the easterly terminus of the existing roadway to provide vehicular access to the three proposed residences fronting Revello Drive. Additionally, a turnaround would be provided per Los Angeles Fire Department (LAFD) regulations and design standards. A B-Permit would be obtained with the Bureau of Engineering (“BOE”) as part of this improvement.

Drainage from water runoff onto the existing portion of Revello to the east and upstream of the site is currently captured by an inlet structure in front of 17526 Revello and conveyed into the main line under the PCH through an above ground 24-inch corrugated metal pipe. After the approximate 200-foot improvement of Revello Drive, the Project would direct any overflow from the three residences along Revello Drive to this existing storm drain and work with the BOE to design said improvements in accordance with BOE regulations and standards. The four proposed homes and roadway extensions are shown in Figure 5, Project Site Plan. Proposed architectural elevations are shown in Figure 10 through 13.

All residences would be located within a Hillside Area Regulations zone. The Project site is located within Zoning Information (ZI) – 2462, also known as an area subject to modifications to single-family zones and single-family zone hillside area regulations (City of Los Angeles 2020b). Per the

requirements of ZI-2462, the project would be required to comply with grading and hauling regulations in hillside areas, including allowable grading and import/export quantities (City of Los Angeles 2017).

3.3.2 Design and Architecture

The maximum envelope height for the proposed residences is 28 feet above natural grade. For the area of the roof, which would be required to feature a slope of less than 25%, Residences 1 and 2 would be 33 feet above natural grade.

The proposed structures would be designed to include geometric elements into the overall aesthetic of the building. The Project would include vertical and horizontal elements that would break up the overall massing of the buildings and provide visual interest. The residential buildings and associated improvements were designed with a strong and appropriately scaled framework of architectural and landscape elements. The building mass throughout the Project site was designed to create a sense of unity within on-site elements, including the on-site hillside. High-quality features would be provided through site design (e.g., building orientation and screening), architecture (e.g., mass, scale, form, style, material, and color), and streetscape elements (e.g., paving materials) (Figures 9 through 12, Architectural Elevations).

3.3.3 Open Space and Landscaping

Per the requirements of LAMC Section 12.40, the Project's landscaping plans, included within Appendix D of this IS/MND, identify a variety of trees and shrubs that would completely hide the proposed retaining walls in excess of 8 feet. The landscaping plans will be subject to the approval of the Director of Planning, in accordance with LAMC Sections 12.40 through 12.43, and will follow the Landscape Guidelines that have been established by the City Planning Commission.

3.3.4 Access, Circulation, and Parking

Vehicles would access the SHP House 1 via Tramonto Drive, an existing paved roadway. More specifically, under the Project, a proposed driveway ramp would be constructed adjacent to the existing paved portion of Tramonto Drive to provide direct access to SHP House 1. Revello Drive (scheduled to be a 20-foot wide roadway) would be extended to the west approximately 225 feet in order to provide access to SHP House 2, JDR House 1, and JDR House 2. A turnaround would be provided on the upslope, on the north side of the proposed Revello Drive extension, between JDR House 1 and 2. Revello and Tramonto Drive are designated by the City's Mobility Element as Local/Other Streets.

3.3.5 Sustainability Features

Construction of the Project would take approximately three years, commencing in approximately September 2022 and completing in approximately September 2025. The construction phases required for the Project would include site preparation, grading/excavation, building construction, paving, and architectural coatings. As shown in Table 2, the total grading for the project, including that required for offsite street improvements, is approximately 29,148 CY, of which 28,341 CY is remedial grading and approximately 33,794 CY would be exported/transported from the Project site (inclusive of an allowance amount for the expansion of soil).

All demolition and construction materials would be stored on site within a staging/laydown area and not within the public right-of-way during hauling, and construction operations. A maximum of approximately 80 workers would access the Project site throughout a typical 8-hour construction workday during peak construction phasing. Construction parking would also be provided on the Project site.

Pursuant to LAMC Section 13.20.D.4(a), a Haul Route approval from the Board of Building and Safety Commissioners is required because the Project proposes the import and/or export of 1,000 CY or more of earth material in a Hillside and Special Grading Area. Hauling operations and construction activities would be conducted in accordance with an approved Haul Route.

3.3.6 Anticipated Construction Schedule

Construction of the Project would take approximately three years, commencing in approximately September 2022 and completing in approximately September 2025. The construction phases required for the Project would include site preparation, grading/excavation, building construction, paving, and architectural coatings. As shown in Table 3, the total grading for the project, including that required for offsite street improvements, is approximately 29,148 CY, of which 28,341 CY is remedial grading and approximately 33,794 CY would be exported/transported from the Project site (inclusive of an allowance amount for the expansion of soil).

All demolition and construction materials would be stored on site within a staging/laydown area and not within the public right-of-way during hauling, and construction operations. A maximum of approximately 80 workers would access the Project site throughout a typical 8-hour construction workday during peak construction phasing. Construction parking would also be provided on the Project site.

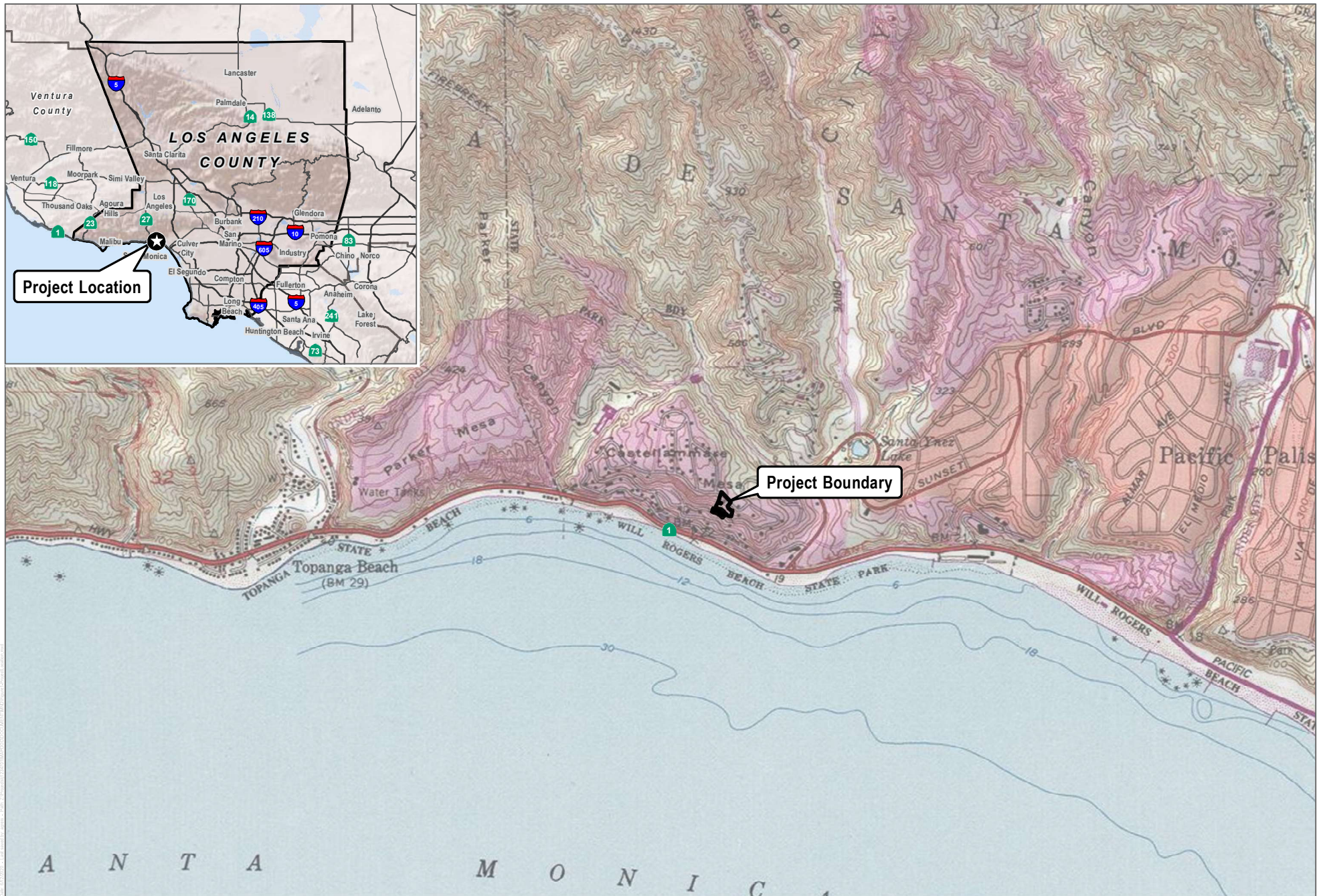
Pursuant to LAMC Section 13.20.D.4(a), a Haul Route approval from the Board of Building and Safety Commissioners is required because the Project proposes the import and/or export of 1,000 CY or more of earth material in a Hillside and Special Grading Area. Hauling operations and construction activities would be conducted in accordance with an approved Haul Route.

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 12.24.X.28, decision-maker approval is required to allow the construction of a new single-family dwelling located on a lot with a continuous paved roadway that is less than 20 feet in paved roadway width from the driveway apron to the boundary of the Hillside area. This ZAD applies to SHP House 2 and JDR Houses 1 and 2.
- Pursuant to LAMC Section 12.24.X.28, decision-maker approval is required to allow the construction of a new single-family dwelling located on a lot with a paved roadway width of less than 20 feet along the frontage of the lot. This ZAD only applies to SHP House 2.
- Pursuant to LAMC Section 12.20.2, a Coastal Development Permit (CDP) to allow the construction of a new single-family dwelling. This CDP applies to SHP Houses 1 and 2 and JDR Houses 1 and 2
- Pursuant to Government Code Sections 65590 and 65590.1 and the City of Los Angeles Interim Mello Act Compliance Administrative Procedures, a Mello Act Compliance Review for the construction of a new single-family dwelling unit. This MEL applies to SHP Houses 1 and 2 and JDR Houses 1 and 2

- Pursuant to LAMC Section 13.20.D.4(a), a Haul Route Approval from the Board of Building and Safety Commissioners (BBSC) is required because the Project proposes the import and/or export of 1,000 cubic yards (CY) or more of earth material.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.



SOURCE: USGS 7.5-Minute Series Topanga Quadrangle

FIGURE 1

Project Location

Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK

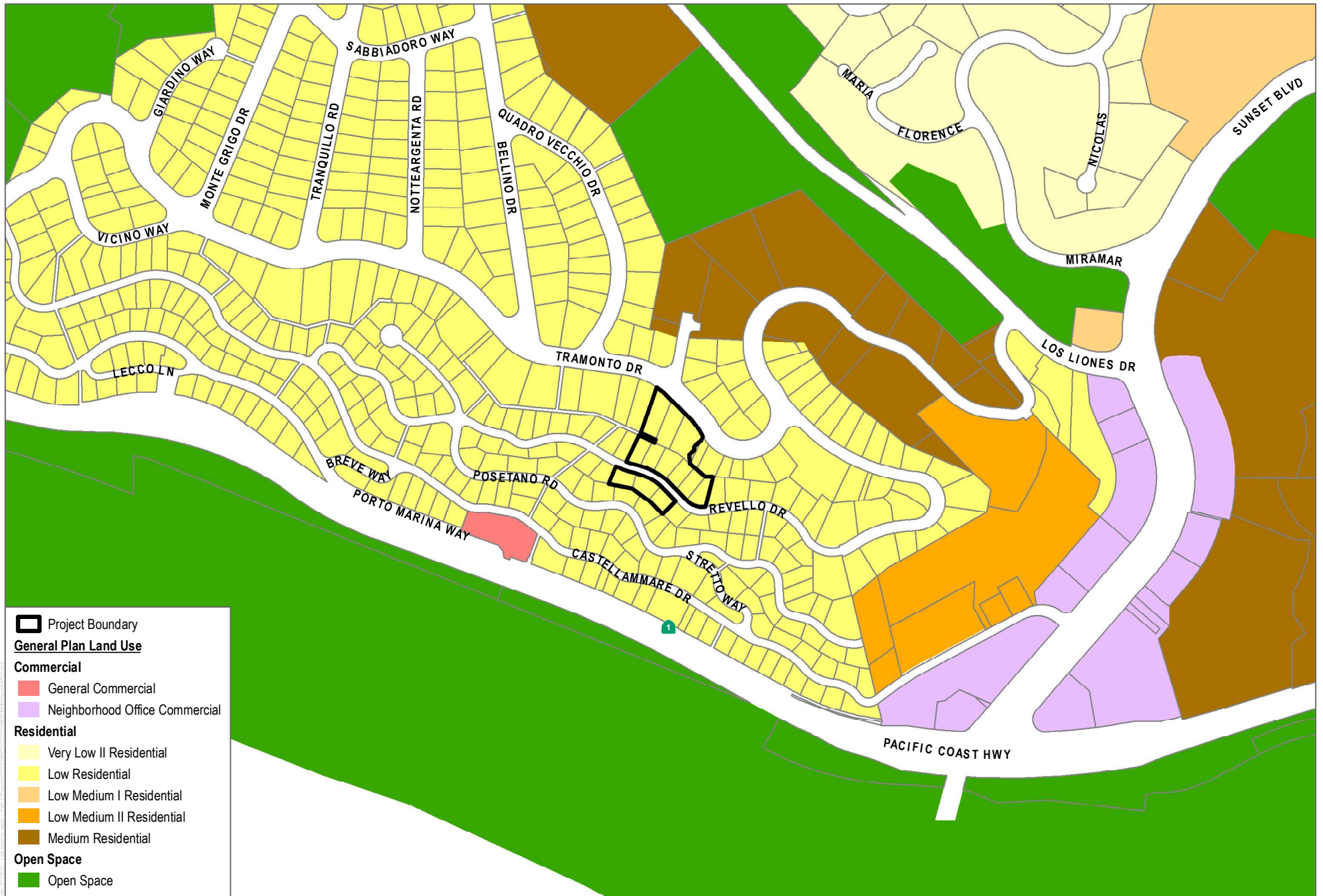


FIGURE 2

Surrounding Land Uses

Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK



SOURCE: Los Angeles County 2020; Bing Maps

INTENTIONALLY LEFT BLANK



SOURCE: Los Angeles County 2020; Bing Maps

FIGURE 4
Zoning

Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK

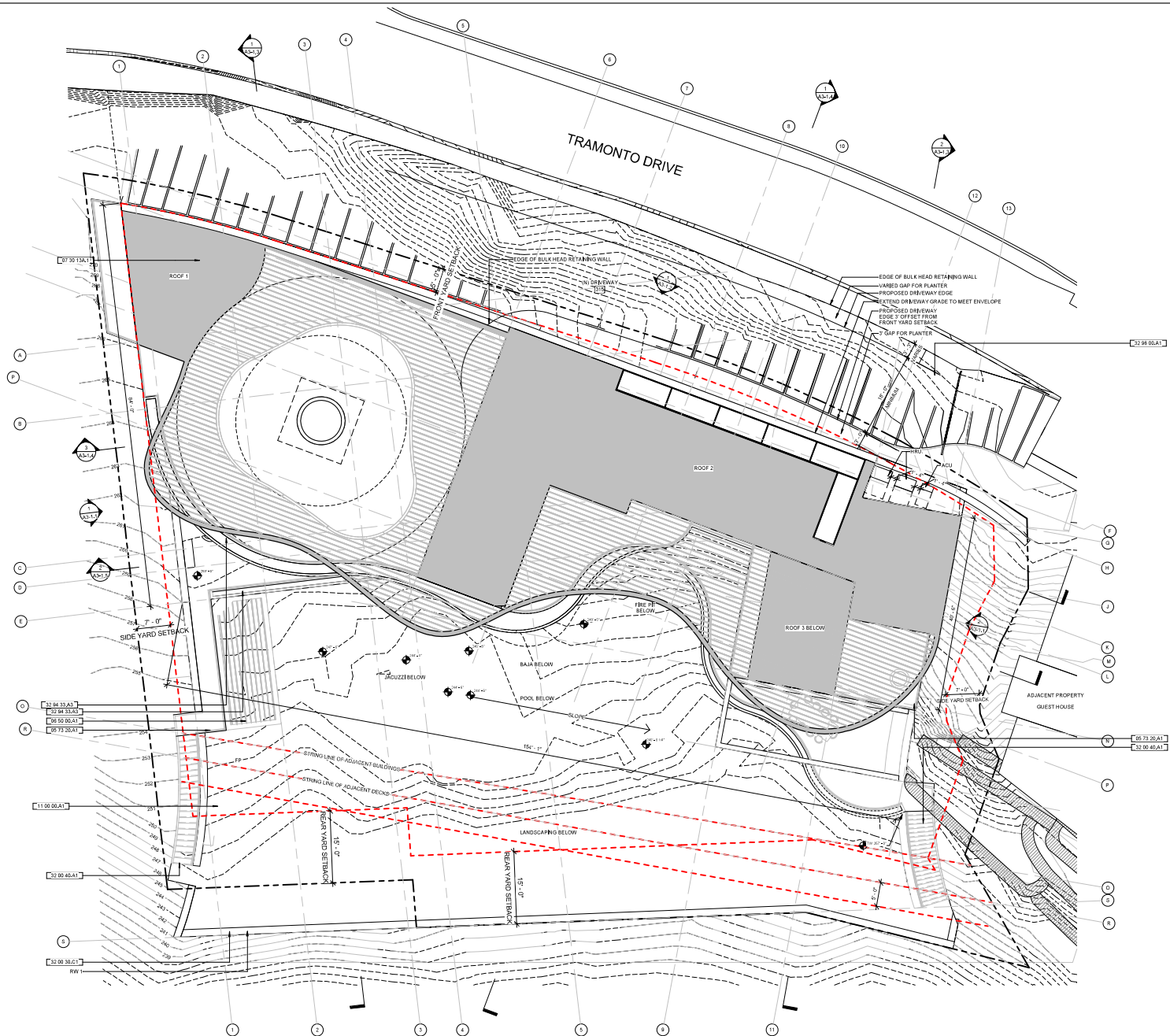


FIGURE 5

Project Site Plan

Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK



SOURCE: Mayes Office, 2020

DUDEK

FIGURE 6

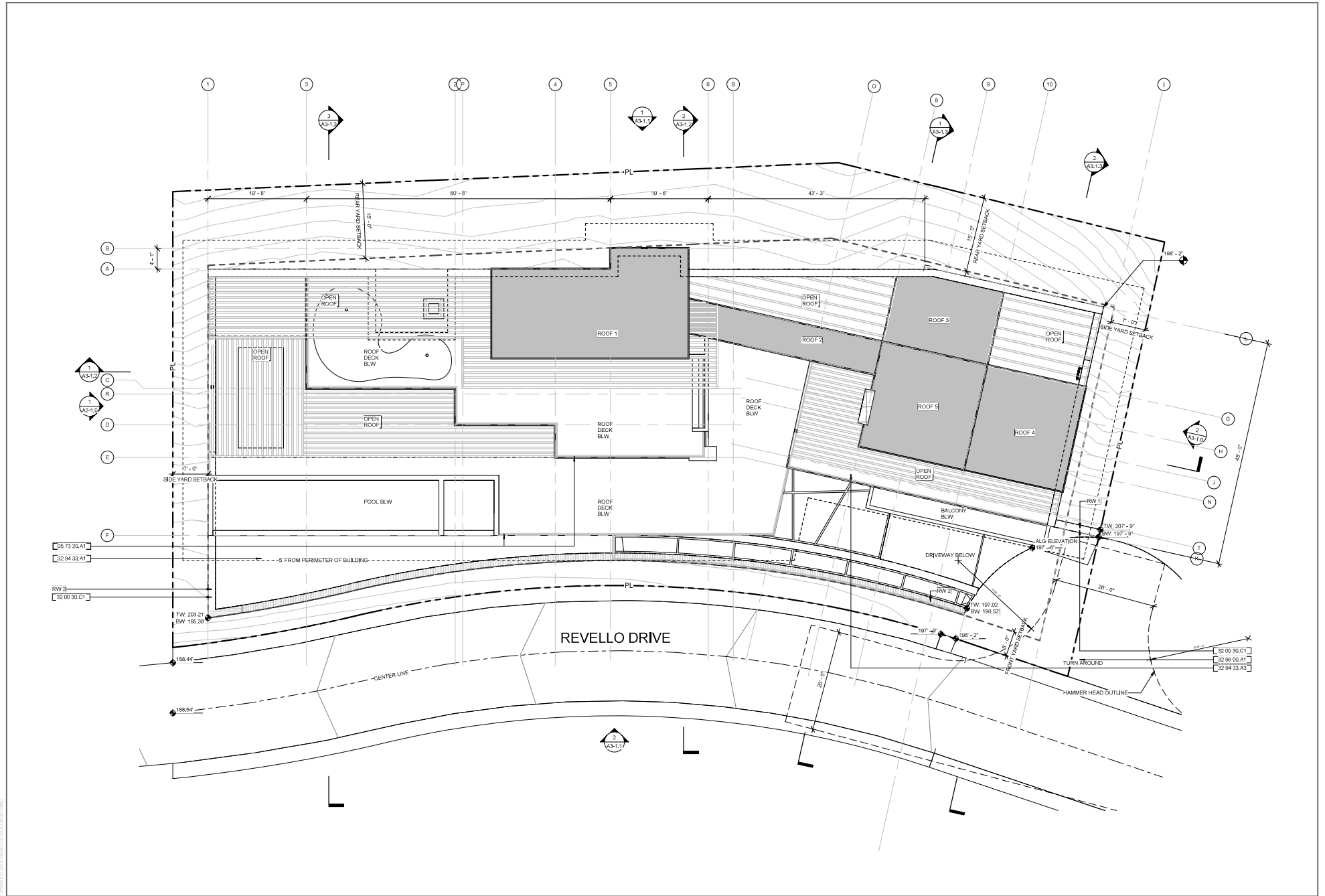
SHP House 1 - Site Plan

Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK

INTENTIONALLY LEFT BLANK

INTENTIONALLY LEFT BLANK



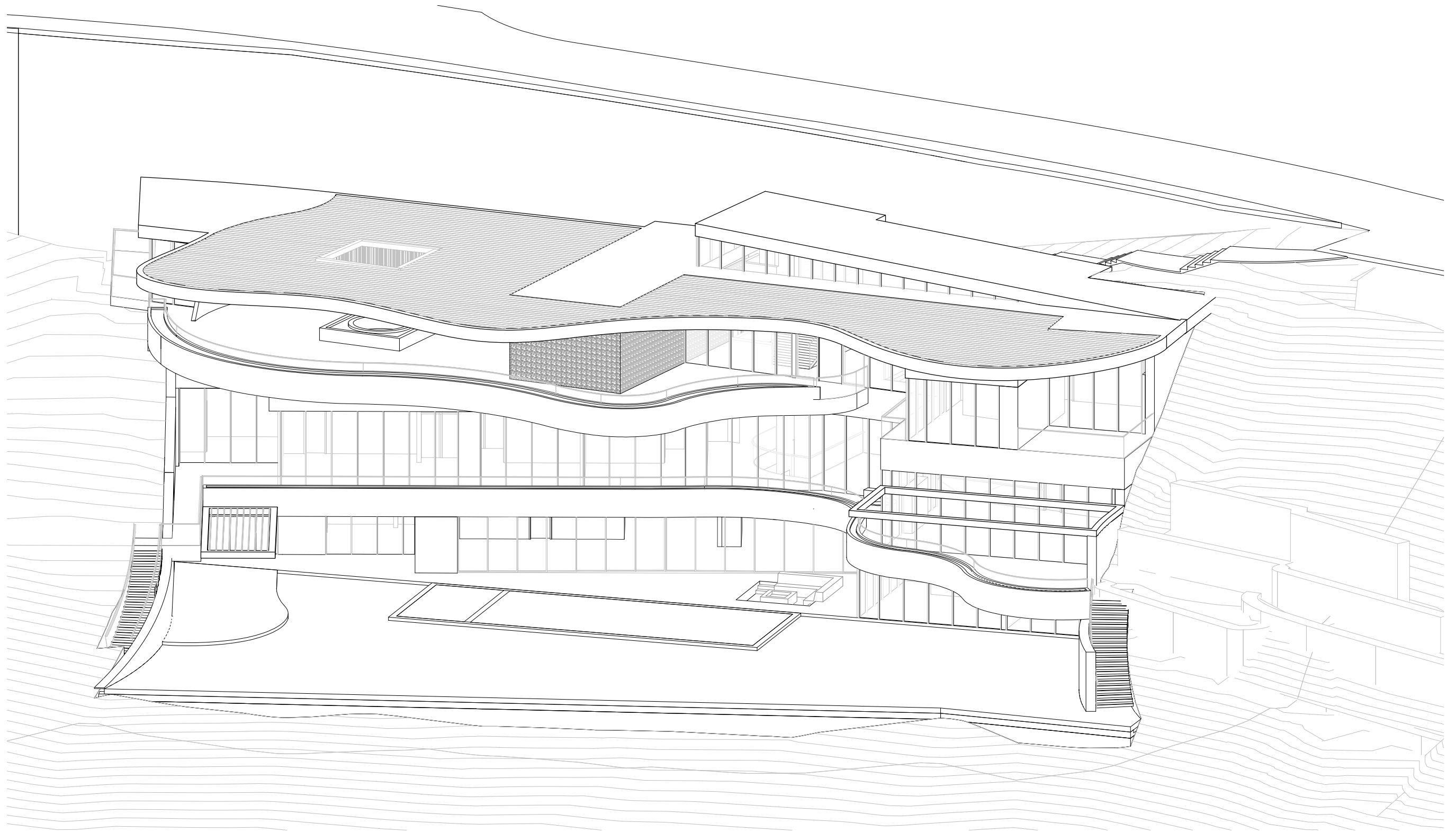
SOURCE: Mayes Office, 2020

FIGURE 9

JDR House 2 - Site Plan

Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK



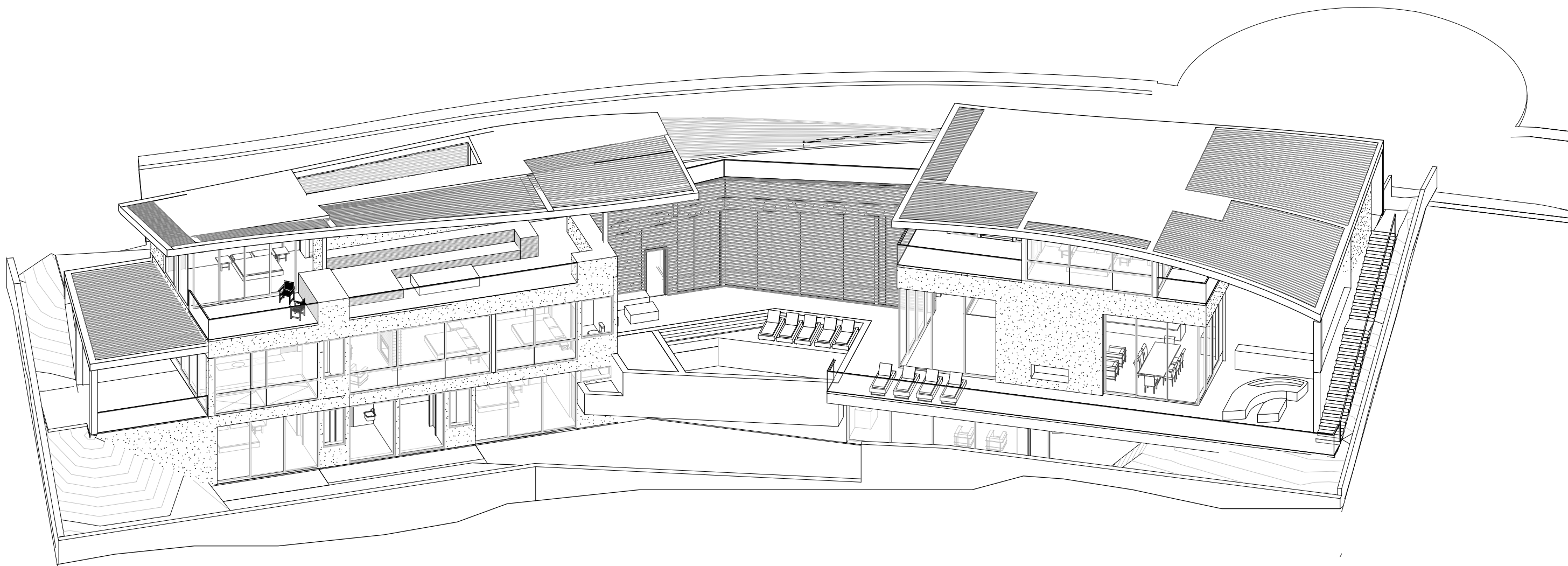
SOURCE: Mayes Office, 2020

DUDEK

FIGURE 10

SHP House 1 - Architectural Elevations
Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK



SOURCE: Mayes Office, 2020

FIGURE 11

INTENTIONALLY LEFT BLANK



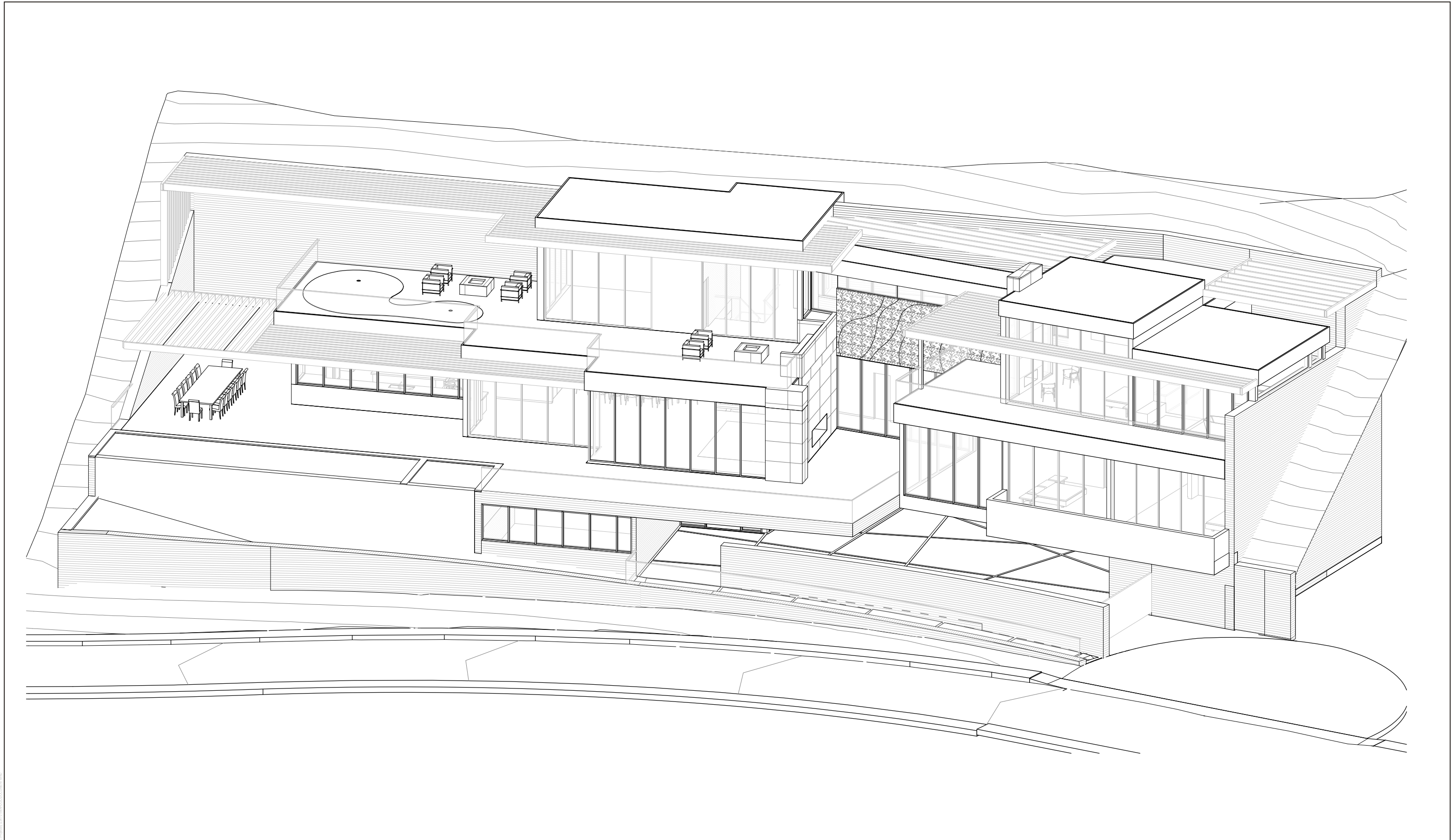
SOURCE: Mayes Office, 2020

FIGURE 12

JDR House 1 - Architectural Elevations

Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK



SOURCE: Mayes Office, 2020

DUDEK

FIGURE 13

JDR House 2 - Architectural Elevations
Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK



SOURCE: Z Consulting Company 2020; Los Angeles County 2020; Bing Maps

INTENTIONALLY LEFT BLANK



SOURCE: Z Consulting Company 2020; Los Angeles County 2020; Bing Maps

FIGURE 15

Noise Measurement Location

Revello Drive and Tramonto Drive Residential Project

INTENTIONALLY LEFT BLANK

INITIAL STUDY

4 Environmental Impact Analysis

I. AESTHETICS

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

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to introduce incompatible visual elements within a field of view containing a scenic vista or substantially block views of a scenic vista.

The Project site generally lacks natural features of substantial scenic value such as rugged, expansive terrain; unique rock outcroppings; natural bodies of water; or public parks. However, long broad views of the Pacific Ocean are available from Tramonto Drive, directly to the north of the Project site. Per the Brentwood-Pacific Palisades Community Plan, new hillside buildings may block views or present an unsightly view from below. The Brentwood-Pacific Palisades Community Plan requires that residential projects preserve existing views in hillside areas by strictly adhering to the adopted Citywide Hillside Ordinance (City of Los Angeles 1996) and the applicable provisions of the Zoning Code.

SHP House 1 would be located directly to the south of Tramonto Drive, introducing a new building that could partially obstruct these views. However, all proposed residences would adapt to the topography of the site, in order to complement the existing natural topography and hillsides of the Project site, through the implementation of building step downs consistent with the existing slope of the site. More specifically, the north elevation of SHP House 1, as seen from Tramonto Drive, would be one story in height, and thus, would not substantially affect existing expansive views of the Pacific Ocean. SHP House 2, JDR House 1, and JDR House 2 would be located further south of SHP House 1 and down-slope. Therefore, these proposed residences would not be visible and would not obstruct scenic vistas from any public area. As such, construction of the proposed single-family residences would not introduce an incompatible visual element onto the Project site that would have a substantial adverse effect on a scenic vista; therefore, impacts associated with scenic vistas would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur only if scenic resources within the viewshed of a designated scenic highway were to be damaged or removed by a Project.

The Project site is not located within or along a designated scenic highway. The nearest officially designated state scenic highway is State Route 27, located approximately 2.5 miles west of the Project site. The Project site is located approximately 350 feet north of State Route 1, which is an eligible state scenic highway (Caltrans 2011). However, due to the steep slope present between State Route 1 and the Project site, the proposed residences would not be prominently visible from this location. Further, Sunset Boulevard, located approximately 0.25 miles east of the Project site, is designated as a scenic highway in the Brentwood-Pacific Palisades Community Plan (City of Los Angeles 1998). However, due to distance between the Project site and Sunset Boulevard, as well as intervening elements such as commercial and residential development, views of the Project site would not be available from Sunset Boulevard.

As demonstrated above, because the Project would not be located in the vicinity of a state scenic highway, and because the Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway, impacts would be less than significant.

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

Less-Than-Significant Impact. The proposed Project would be located in an urbanized area. Therefore, a significant impact may occur if a project would conflict with applicable zoning and other regulations governing scenic quality.

The Project site is zoned R1-1, which allows for one-family dwellings; parks, playgrounds, or community centers, owned and operated by a government agency; truck gardening; two-family dwellings; accessory buildings; accessory uses; name plates and signs; and backyard beekeeping. In an effort to ensure that the Project would not result in any future adverse changes

related to visual character and quality, and to ensure the proposed residential structures are visually compatible with surrounding land uses, the Project would be designed in accordance with LAMC Section 12.08, which sets forth development standards for the R1 zone. In addition, the Project would be subject to review by decision makers to ensure that design of the proposed structures is consistent with all applicable design requirements, standards, and regulations set forth in the LAMC.

The Brentwood-Pacific Palisades Community Plan identifies goals and policies guiding the aesthetic qualities of existing and future development in the Brentwood-Pacific Palisades Community Plan Area. The following visual-related objectives and policies applicable to the Project include:

- **Objective 1-3:** To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.
 - **Policy 1-3.1:** Protect existing views in hillside areas.
 - **Policy 1-3.3:** Consider factors such as neighborhood character and identity, compatibility of land uses, impacts on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.
- **Objective 1-6:** To limit the intensity and density in hillside areas to that which can reasonably be accommodated by infrastructure and natural topography.
 - **Policy 1-6.3:** Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area.
 - **Policy 1-6.4:** Encourage clustering of single-family residences in order to use the natural terrain to the best advantage.
 - **Policy 1-6.5:** Require that any proposed development be designed to enhance and be compatible with adjacent development.
 - **Policy 1-6.6:** The scenic value of natural landforms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.

Under the existing conditions, the Project site is currently undeveloped. The Project site is within an urbanized area. Although there are undeveloped parcels adjacent to the Project site to the west, south, and southeast, the site is generally surrounded by existing single-family residences in the Pacific Palisades neighborhood. As such, due to the presence of existing single-family structures in the area, construction of the proposed single-family residences would not introduce an incompatible visual element onto the Project site. The Project would be consistent with the single-family residential character as viewed from the surrounding properties. Further, the Project would introduce high-quality architectural features (i.e., mass, scale, form, style, material, and color) would integrate the hillside and provide visual interest as well as building step downs that would ensure consistency with the existing slope of the site. Therefore, would comply with the objectives and policies outlined in the Brentwood-Pacific Palisades Community Plan.

The Project's grading quantities are regulated by the LAMC and the Baseline Hillside Ordinance (Ord 181,624), which states the cumulative quantity of grading, or the total combined value of both cut and fill or incremental cut and fill, for any one property shall be limited to a base maximum of 1,000 cubic yards plus the numeric value equal to 5% of the total lot size in cubic yard (City of Los Angeles 2011a). As such, through compliance with this policy, the Project would not alter existing or natural terrain, which could impact the Project site's hillside.

As the Project would comply with all applicable design standards and policies, it would not degrade the existing visual character or quality of the site and its surroundings. Therefore, impacts associated with conflicts with applicable zoning regulations governing scenic quality would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project introduces new sources of light or glare that would be incompatible with the areas surrounding the Project site.

Construction

Throughout the duration of Project construction, construction activities would occur during hours permitted by LAMC Section 41.40, between 7:00 a.m. and 9:00 p.m. on weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays and federal holidays, with no construction permitted on Sundays (City of Los Angeles 2020b). As such, given that no nighttime construction is permissible on site, nighttime lighting would not be required during Project construction. Therefore, construction-related impacts associated with light and glare would be less than significant.

Operation

The Project would include the installation of new lighting on the proposed residential structures. For example, new exterior lighting, interior building lighting, and some landscape and nighttime security lighting would be installed. The Project would be compatible with existing Low Residential uses that the neighborhood is designated for. Due to the urbanized nature of the area, a moderate level of ambient nighttime light already exists. Nighttime lighting sources include streetlights, vehicle headlights, and interior and exterior building illumination.

The Project would be required to comply with all applicable regulations as set forth in the Los Angeles Municipal Code. These regulations require that exterior lighting be adequately shielded and oriented to avoid glare impacts, as well as light trespass impacts on adjacent properties. Specifically, LAMC Chapter 9, Article 3, Section 93.0017 states "no exterior light source may cause more than two foot-candles of lighting intensity or receive direct glare from the light source" (City of Los Angeles 2020b). As such, all new exterior lighting is required to be designed and installed with shielding such that the light source cannot be seen from adjacent residential properties, from the public right-of-way, or from above.

In addition, in terms of daytime glare, although large expanses of glass would be provided along several facades of the proposed residences, these windows would be comprised of materials such as non-reflective tinted glass, which would minimize glare and reflected heat. Therefore, through compliance with existing lighting regulations and implementation of appropriate building materials to reduce glare, impacts associated with light and glare would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. A significant impact may occur if a Project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use.

The Project site is located within a developed area of the Brentwood-Pacific Palisades Community Plan in the City of Los Angeles. No farmland or agricultural uses are present within the Project site or surrounding area. Located within the urban region of Los Angeles County, the Project site and surrounding area are not included in the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (DOC 2020). As such, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively "Important Farmland") to non-agricultural use. Therefore, impacts associated with Prime or Unique Farmland, or Farmland of Statewide Importance would not occur.

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

No Impact. A significant impact may occur if a Project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

Per the State of California Williamson Act Map designates the Project site, no Williamson Act Contracts are present on-site and in the surrounding area (DOC 2017). In addition, the Project site is zoned R1-1 (One-Family Zone) (City of Los Angeles 2020a). Therefore, the Project site is not zoned for agricultural use, and the surrounding area does not support agricultural uses.

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

No Impact. A significant impact may occur if a Project were to result in the conversion of forest land or timberland to non-timberland production use.

The Project site is not located on or adjacent to land zoned for forest land or timberland, including timberland zoned Timberland Production. The Project site is surrounded by urban development primarily consisting of residential uses. Therefore, impacts associated with forestland and timberland would not occur.

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

No Impact. A significant impact may occur if a Project were to result in the conversion of forest land or timberland to non-timberland production use.

The Project site is not located on or in the vicinity of land zoned for forest use and would not have impacts related to loss or conversion of forest lands. Therefore, impacts associated with loss or conversion of forestland would not occur.

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

No Impact. A significant impact may occur if a Project were to convert existing agricultural land or forestland into non-agricultural or forest use.

The Project site is not located on or adjacent to any agricultural or forest land. For this reason, the Project would not involve changes to the existing environment that could cause conversion of Farmland or forest land to non-agricultural use. Therefore, impacts associated with conversion of agricultural land or forestland would not occur.

III. AIR QUALITY

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

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

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

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

The purpose of a consistency finding is to determine whether a Project is inconsistent with the assumptions and objectives of the regional air quality plans and whether it would therefore interfere with the region's ability to comply with federal and state air quality standards. Specifically, SCAQMD recommends that environmental documents should discuss the Project's consistency with the current AQMP, which is the 2016 AQMP, including several of the underlying key assumptions for the air quality plans, such as the number and location of population, housing units, and employment from the Southern California Association of Governments (SCAG) growth projections and plans, as well as consistency with a local government's air quality element or air quality-related policies in other general plan elements, if the local government has adopted such policies.

In general, Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP. SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for its Regional Transportation Plan/Sustainable Communities

Strategy (SCAG 2016), which is based on general plans for cities and counties in the South Coast Air Basin (SCAB), for the development of the AQMP emissions inventory (SCAQMD 2017).¹ The SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy and the associated Regional Growth Forecast are generally consistent with the local plans. Therefore, the 2016 AQMP is generally consistent with local government plans.

If a Project is inconsistent, the SCAQMD recommends that local governments should consider project modifications or inclusion of mitigation to eliminate the inconsistency. The SCAQMD CEQA Air Quality Handbook (SCAQMD 1993) states:

It is important to note that even if a project is found consistent it could still have a significant impact on air quality under CEQA. For example, if the analysis demonstrates a project is consistent with the regional air plans and local Air Quality Element that does not mean that the project could not also have a significant effect on air quality by exceeding the significance thresholds.

There are two key indicators of consistency with the AQMP:

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Given that the Project is an allowable use within the R1-1 zone and Low Residential General Plan land use designation (City of Los Angeles 2020a), the Project would be consistent with the growth projections assumed in the 2016 AQMP. To address the criterion regarding the Project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, an air quality modeling analysis that identified the Project's impact on air quality was performed. As discussed under Question b, the Project would result in a minimal increase in air pollutant emissions and would not result in a significant impact associated with the violation of an air quality standard.

Based on the above considerations, impacts related to the Project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant.

¹ Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socio-economic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socio-economic and transportation activities projections in their 2016 Regional Transportation Plan/Sustainable Communities Strategy are integrated in the 2016 AQMP (SCAQMD 2017).

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

Less-Than-Significant Impact. A significant impact may occur if a Project would add a considerable cumulative contribution to federal or state non-attainment pollutant.

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, proposed Project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a Project's individual emissions would have a cumulatively significant impact on air quality. If a Project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, Projects that do not exceed the Project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

SCAQMD has established Air Quality Significance Thresholds, depicted in Table 4, that set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality under existing and cumulative conditions (SCAQMD 2019).

TABLE 4. SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (Pounds per Day)	Operation (Pounds per Day)
VOC	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Lead ^a	3	3

Source: SCAQMD 2019.

Notes: SCAQMD = South Coast Air Quality Management District; ROG = reactive organic gas; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

^a The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead. Therefore, it is not discussed in this analysis.

To evaluate the potential for the Project to violate any air quality standard or contribute substantially to an existing or projected air quality violation, this analysis applies SCAQMD's construction and operational criteria pollutants mass daily thresholds, as shown in Table 2. A project would result in a substantial contribution to an existing air quality violation of the National Ambient Air Quality Standards or California Ambient Air Quality Standards for ozone (O₃), which is a nonattainment pollutant, if the project's construction or operational emissions would exceed the SCAQMD reactive organic gas (ROG) or oxides of nitrogen (NO_x) thresholds shown in Table 4. These emissions-based thresholds for O₃ precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O₃ impacts to occur). This approach is used because O₃ is not emitted directly, and the effects of an individual project's emissions of O₃ precursors (ROG and NO_x) on O₃ levels in ambient air cannot be readily determined through air quality models or other quantitative methods.

Project-Specific Construction Emissions

Construction of the Project would result in the addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially from day to day, depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions. Thus, such emissions levels can only be estimated, with a corresponding uncertainty in precise ambient air quality impacts. Fugitive dust, which includes particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀, or coarse particulate matter) and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}, or fine particulate matter), would primarily result from site preparation and grading activities. NO_x and carbon monoxide (CO) emissions would primarily result from the use of construction equipment and motor vehicles. ROG emissions would primarily result from architectural coatings.

The Project involves the construction of four new single-family residences. The Project would result in emissions of CO, NO_x, fine and coarse particulate matter (PM_{2.5} and PM₁₀), and ROG during Project construction. The California Emissions Estimator Model (CalEEMod) was used to estimate Project construction emissions based on SCAQMD guidelines (Appendix A). Project-specific information was used where possible, and CalEEMod default assumptions were used where necessary and appropriate. Construction phases assumed in the modeling included site preparation, grading/excavation, building construction, paving, and architectural coating. Table 5 provides the total regional emissions generated during Project construction.

TABLE 5. REGIONAL CRITERIA POLLUTANT EMISSIONS

Phase	Pollutant Emissions (pounds per day)					
	CO	NO _x	PM ₁₀	PM _{2.5}	SO _x	ROG
Site Preparation	5.4	4.0	0.3	0.3	0.0	0.5
Grading/Excavation	14.0	16.3	0.9	0.9	0.0	1.5
Building Construction	23.0	18.0	1.3	1.3	0.1	2.8
Paving	11.4	6.2	0.5	0.5	0.0	0.9
Architectural Coating	4.4	1.2	0.3	0.3	0.0	6.6
Construction Emissions Total	62	44.5	3.3	3.3	0.1	22.2
Significance Threshold	550	100	150	55	150	75
Significant Emissions?	No	No	No	No	No	No

Source: Appendix A.

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns in size; PM_{2.5} = particulate matter less than 2.5 microns in size; SO_x = sulfur oxides; ROG= reactive organic gases.

As shown in Table 5, construction emissions would not exceed the SCAQMD's significance thresholds for CO, NO_x, PM₁₀, PM_{2.5}, SO_x, or ROG. Construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. Therefore, significant construction impacts associated with criteria air pollutant emissions would be less than significant.

Project-Specific Operational Emissions

Once operational, the Project would generate nominal air emissions from area sources, energy, and mobile source emissions. The Project's operational emissions would be minimal due to the non-

commercial/non-industrial nature of residential uses, which do not generate substantial amounts stationary and mobile emissions due to the nominal amount of on-site users. As previously discussed, the Project would be consistent with the 2016 AQMP and would not conflict with or obstruct implementation of the AQMP or SCAQMD rules or regulations. Therefore, long-term significant impacts associated with criterial air pollutant emissions would be less than significant.

Cumulative Construction Emissions

Based on information from the City, there are a total of 13 construction projects currently active or in the permitting pipeline, not including the Project (see Figure 13, Related Projects). Cumulative air quality impacts from Project construction, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. By grouping nearby projects together and treating them as one larger construction project, the same method for analyzing localized criteria pollutant impacts can be used to determine the significance of cumulative localized criteria pollutants. Two different groupings of projects were considered for this cumulative localized criteria pollutant analysis: (1) three projects under construction at the same time in a 2.5-acre project area; and (2) five single-family residences under construction at the same time in a 5-acre area. These groupings are shown in Figure 13.

Table 6 presents the cumulative localized criteria pollutant emissions impacts associated with these two scenarios. The maximum emissions are used for each pollutant, regardless of construction phase. Additionally, this analysis presents a conservative maximum representation of cumulative emissions because it assumes that all of the projects are the same size as the Project and would all be in the most polluting phase of construction simultaneously. Note that Project B, located at 17537 Tramonto, shown on Figure 13, is not included in the impacts presented in Table 6 because it is nearly complete and is not expected to be actively under construction when Project construction begins. However, the cumulative pollutant emissions outlined in Table 6 would remain below the level of significance if Project B was included. This can be calculated by multiplying the Cumulative Scenario 1 impacts by 4/3 and multiplying the Cumulative Scenario 2 impacts by 6/5.

TABLE 6. CUMULATIVE LOCALIZED CRITERIA POLLUTANT EMISSIONS IMPACTS

Parameter	Pollutant Emissions (pounds per day)			
	CO	NO _x	PM ₁₀	PM _{2.5}
Cumulative Scenario 1: Three Projects in 2.5 Acre				
Cumulative Emissions	50.4	51.1	4.9	2.1
Significance Threshold ¹	944	159	7.2	4.3
Significant Emissions?	No	No	No	No
Cumulative Scenario 2: Five Projects in 5 Acres				
Cumulative Emissions	84.0	85.2	8.1	3.5
Significance Threshold ¹	1,531	221	13.0	6.0
Significant Emissions?	No	No	No	No

Source: Appendix A.

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns in size; PM_{2.5} = particulate matter less than 2.5 microns in size.

Table 6 shows that the Project does not cause or contribute to a cumulative exceedance of the localized criteria pollutant significance thresholds; therefore, construction impacts associated with a cumulatively considerable net increase of non-attainment criteria pollutants would not occur.

Cumulative Operational Emissions

Related projects could contribute to an existing or projected air quality exceedance because SCAB is currently in nonattainment for PM₁₀ and PM_{2.5}. SCAQMD published the White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution regarding how to address cumulative impacts from air pollution. In this document, the SCAQMD states the following (SCAQMD 2003):

The AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

Thus, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment and, as such, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. The Project will not exceed the applicable SCAQMD regional threshold for construction and operational-source emissions. Therefore, significant long-term impacts associated with a cumulatively considerable net increase of nonattainment criteria pollutants would not occur.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less-Than-Significant Impact. A significant impact may occur if the construction or operation of a Project exceeds an Ambient Air Quality Standard at a sensitive receptor location.

Sensitive receptors are people who are highly sensitive to air pollution or environmental contaminants. SCAQMD states that locations where sensitive receptors are likely to occur include health care facilities, rehabilitation centers, residences, schools, playgrounds, childcare centers, and athletic facilities. The Project site is located near multiple existing and potential future residential receptors. The nearest residential receptor is located less than 25 meters (82 feet) from the Project site. Therefore, per localized significance threshold (LST) guidance, the smallest available source-receptor distance of 25 meters is used to determine the applicable thresholds (Appendix A).

Construction

A localized criteria pollutant impacts analysis was undertaken to determine potential impacts to nearby sensitive receptors during Project construction. The Project could emit pollutants, including particulate matter, CO, NO_x, PM₁₀, and PM_{2.5} during Project construction that would impact sensitive receptors near the Project site. As a localized impact, only emissions generated on site are included in the significance determination. Emissions from on-road vehicles and architectural coatings (architectural coatings only emit ROG emissions) are not included in the assessment of the localized impacts. The SCAQMD has established localized significance thresholds for PM₁₀, PM_{2.5}, CO, and NO_x to describe a project's on-site emission impacts to nearby sensitive receptors (Appendix A). Table 7 presents the emissions calculated for each construction phase using CalEEMod to determine the significance of the Project's localized construction emissions.

TABLE 7. LOCALIZED CRITERIA POLLUTANT IMPACTS

Phase	Pollutant Emissions (pounds per day)			
	CO	NO _x	PM ₁₀	PM _{2.5}
Site Preparation	4.5	3.8	0.34	0.22
Grading/Excavation	11.9	13.4	1.62	0.61
Building Construction	16.8	17.0	0.73	0.70
Paving	8.8	5.9	0.28	0.26
Architectural Coating	1.8	1.2	0.06	0.06
Construction Emissions Total	43.8	41.3	3.03	1.85
Significance Threshold ¹	718	129	5.18	3.59
Significant Emissions?	No	No	No	No

Source: Appendix A.

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns in size; PM_{2.5} = particulate matter less than 2.5 microns in size.

¹ The nearest residential receptor is located less than 25 meters from the Project site. Therefore, per LST guidance, the smallest available source-receptor distance of 25 meters is used to determine the applicable thresholds.

As shown in Table 7, the Project would not exceed the SCAQMD's localized significance thresholds for Project construction. Therefore, construction impacts associated with exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

Operation

Upon completion of the Project, the Project would generate nominal air emissions from area sources, energy, and mobile source emissions. The Project's operational emissions would be minimal due to the non-commercial/non-industrial nature of residential uses, which do not generate substantial amounts of stationary and mobile emissions due to the nominal amount of on-site users. Therefore, significant long-term impacts associated with exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project would generate substantial odors.

Typical sources of odor include manufacturing plants, rendering plants, coffee roasters, wastewater treatment plants, sanitary landfills, and solid waste transfer stations.

Construction

During construction, the various diesel-powered vehicles and equipment used on the Project site could create localized odors; however, these odors would be temporary and would not likely be noticeable for extended periods of time beyond the Project's site boundaries. In addition, SCAQMD Rule 113, which is applicable to Project construction, limits the amount of ROG that may be used during the architectural coating phase of construction activities. Therefore, construction impacts associated with odors would be less than significant.

Operations

The Project would involve the construction of four new single-family residences. Because the Project would not involve activities associated with industrial projects involving chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, no odors of these types are anticipated. Residential trash receptacles used by the future residents would be typical of all other receptacles used in the surrounding area, which are closed receptacles with lids that help to minimize odor impacts. This Project component would ensure that the location of trash receptacles adjacent to existing residences would not result in objectionable odors. The Project would not include uses that would have potential sources of objectionable odors. Therefore, long-term impacts associated with odors would be less than significant.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the state or federal regulatory agencies previously cited.

Dudek prepared a Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project (Biological Resources Letter Report) on November 27, 2019, which includes a biological resources assessment for the Project site and a 500-foot buffer surrounding the site. Further, Dudek prepared a Rare Plant Survey Memorandum for the Revello and Tramonto Drive Residential Project (Rare Plant Survey Memo) on July 9, 2020, which includes the results of a rare plant survey for the Project site, including a 100-foot buffer surrounding the site. The need for the focused rare plant survey was based upon the previous analysis of the Biological Resources Letter Report, which determined that two species, Braunton's milkvetch (*Astragalus brauntonii*) and Brewer's calandrinia (*Calandrinia breweri*), had a moderate potential to occur on the site. However, due to the lack of flowers and fruits at the time the survey for the Biological Resources Letter Report was conducted, the presence of these species on-site was not scoped out at that time. The Biological Resources Letter Report and the Rare Plant Survey Memo are included as Appendix B1 and B2 of this IS/MND, respectively.

Special-Status Plants

No special-status plant species were observed within the Project site during the general biological reconnaissance survey performed on November 12, 2019. However, two special-status plant species were determined to have a moderate potential to occur within the Project site: Braunton's milk-vetch (*Astragalus brauntonii*) and Brewer's calandrinia (*Calandrinia breweri*). However, per the Rare Plant Survey Memo (Appendix B2), no special-status plants, including Braunton's milk-vetch (*Astragalus brauntonii*) and Brewer's calandrinia (*Calandrinia breweri*), were observed at the Project site during the June 2020 survey. Therefore, impacts to special-status plants would be considered less than significant.

Special-Status Wildlife

No special-status wildlife species were observed within the Project site during the general biological reconnaissance survey (Appendix B1). Additionally, no special-status wildlife species were determined to have a moderate or high potential to occur within the Project site due to the lack of suitable habitat and the limited, isolated native vegetation within the study area. One bat species, western mastiff bat (*Eumops perotis californicus*), may occasionally forage within the Project site. This species is not likely to roost on site due to the lack of suitable roosting trees or rocky habitat. Therefore, impacts to special-status wildlife would be considered less than significant.

Conclusion

Due to the lack of special-status vegetation communities and plant and wildlife species on-site, the Project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in

local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, impacts associated with candidate, sensitive, or special-status species would be considered less than significant.

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

Less-Than-Significant Impact with Mitigation Incorporated. A significant impact may occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the state and federal regulatory agencies cited would be adversely modified by a Project.

Per the Biological Resources Letter Report (Appendix B1), five vegetation communities are present at the Project site and within the 500-foot buffer area. These include disturbed lemonade berry scrub, disturbed quailbush scrub, urban/developed land, ornamental vegetation, and disturbed habitat. The lemonade berry scrub vegetation community is considered sensitive by local, state, and/or federal agencies.

As provided in the Biological Resources Letter Report (Appendix B1), approximately 0.62-acre of disturbed lemonade berry scrub would be permanently impacted directly. Potential indirect impacts include fugitive dust, chemical pollutants, erosion, and increased human activity during the Project activities. However, the lemonade berry scrub to remain in place is already disturbed and construction Best Management Practices (BMPs) would minimize the effect of these impacts. Therefore, indirect impacts to lemonade berry scrub would be less than significant and no avoidance or mitigation measures are recommended. However, direct permanent impacts to special-status vegetation communities could be considered significant absent mitigation. Based upon the Project design and the need to maintain the property in accordance with the City of Los Angeles Fire Code (L.A.M.C. 57.322),² on-site mitigation is not feasible. Mitigation Measure (MM) BIO-1 will be required to adequately reduce potential impacts to sensitive natural communities to less than significant.

MM-BIO-1 Prior to the issuance of grading and building permits, the project applicant shall purchase restoration or creation credits of at least 2:1 (1.12 acres for 0.56 acres impacted) to mitigate the project's impact on the sensitive-status Lemonade Berry Scrub vegetation community to a less-than-significant level. The mitigation lands shall be comprised of similar or higher quality vegetation as found in the lemonade berry scrub on the project site. Credits may be purchased from the following conservation and mitigation banks established by the California Department of Fish and Wildlife: Petersen Ranch Mitigation Bank, Santa Paula Creek Mitigation Bank, or Soquel Canyon Mitigation Bank.

² Areas within 200 feet of structures and/or 10 feet of roadside surfaces or combustible fence: Grass shall be cut to three inches in height. Native brush shall be reduced in quantity to three inches in height. This does not apply to individual native shrubs spaced a minimum of 18 feet apart, provided such shrubs are trimmed up from the ground to 1/3 of their height with all dead material being removed.

The Quailbush scrub vegetation community is not considered sensitive by local, state, and/or federal agencies. No riparian features and/or dominant wildlife trails were observed during the site visit.

Other non-native invasive plant species could be located on the Project site, and there is a potential during Project construction that these could be spread and result in significant impacts to surrounding native plant species. With implementation of mitigation measure MM-BIO-2, which outlines how non-native plant species should be removed during construction activities, impacts would be reduced to less than significant.

MM-BIO-2 Prior to the start of site clearance, any non-native shrub and tree species (e.g., castor bean [*Ricinus communis*], and tree tobacco [*Nicotiana glauca*]) shall be flagged by a qualified biologist (someone with at least 3 years of experience with plant identification in the project region). These plants shall not be cut and mulched and shall instead be cut down, bagged or contained, removed from the project site, and disposed of at an appropriate offsite location so as to prevent spread to surrounding areas.

During operations, the Project would include landscaping throughout the Project site. Invasive plant species, if they were to be used on the Project site, could spread quickly and displace native plants, prevent native plant growth, and create monocultures. In the event that this would occur, operational impacts could be potentially significant. However, with implementation of mitigation measure MM-BIO-3, which place limitations on the types of plant species that can be utilized on the Project site, operational impacts would be reduced to a less than significant level.

MM-BIO-3 Prior to issuance of the building permits and during plan check, the City shall verify that the landscaping plant palette shall not include any plant species listed as “Moderate” or “High” by the California Invasive Plant Council (Cal-IPC 2021).

Therefore, with the incorporation of mitigation, impacts associated with riparian habitat or other sensitive natural communities would be less than significant.

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

No Impact. A significant impact may occur if state or federally protected wetlands were to be modified or removed by a Project. No jurisdictional wetlands or non-wetland waters occur within the study area. Therefore, impacts associated with jurisdictional waters would be considered less than significant.

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

Less-Than-Significant Impact with Mitigation Incorporated. A significant impact may occur if a Project were to interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites.

Nesting Birds

As discussed in the Biological Resources Letter Report (Appendix B1), the existing ornamental trees and shrubs located on the Project site have the potential to support nesting birds. Direct and indirect impacts to migratory nesting birds must be avoided for compliance with the Migratory Bird Treaty Act and the California Fish and Game Code. Nesting birds could be affected by direct impacts due to tree removal and indirect impacts from short-term construction-related noise, resulting in decreased reproductive success or abandonment of an area as nesting habitat. Additionally, the trees and shrubs within the study area, but outside of the Project impact area have the potential to provide potential nesting and foraging habitat for a variety of songbirds and raptors in the area. Impacts to these species are expected to occur if nesting birds are present within the Project site and the surrounding area during Project implementation.

Thus, it is recommended that ground-disturbing and vegetation trimming/removal activities be conducted outside of the breeding season to the extent feasible (i.e., February 1 through August 31). Ground disturbance activities and vegetation removal should be completed outside the avian breeding season (between September 1 and January 31) to the extent feasible. If ground-disturbing activities (e.g., clearing and grubbing) are scheduled to occur between February 1 and August 31, a qualified biologist shall conduct a nesting bird survey within 72 hours of ground-disturbing activities. The survey shall consist of full coverage of the proposed Project footprint and up to a 300-foot buffer (500 feet for suitable raptor habitat). The specific survey buffer will be determined in the field by the Project biologist and will take into account the species nesting in the area, the habitat present, and where access is permitted. If no active nests are found, no additional measures are required. If active nests are found, the nest locations shall be mapped by the qualified biologist. The nesting bird species will be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs, feeding of young, or near fledging) will be determined. The biologist shall establish a no-disturbance buffer around each active nest. The buffer will be determined by the qualified biologist based on the biology of the species present and surrounding habitat (typically a starting point of 300 feet for most birds and 500 feet for raptors but may be reduced as approved by the biologist). No construction or ground-disturbing activities shall be conducted within the buffer until the biologist has determined the nest is no longer active (i.e., no eggs or young) and has informed the construction supervisor that activities may resume. Therefore, direct and indirect impacts to nesting birds would be less than significant due to regulatory compliance.

Wildlife Corridors and Habitat Linkages

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation; they may be continuous habitat or discrete habitat islands that function as stepping stones for wildlife dispersal.

The Project site does not reside within any designated wildlife corridors or habitat linkages. The Project site is surrounded by residential development and paved roads including the PCH, a major thoroughway, providing limited connectivity to other undeveloped areas with naturalized habitat. Thus, the Project site provides some natural vegetation to support wildlife movement through the area; however, the Project site is likely too isolated to provide high quality "live-in" habitat for most wildlife species. Additionally, proposed Project activities would occur primarily during daytime hours as specified in the City of Los Angeles building code, limiting the potential noise and lighting impacts during the nighttime hours when most wildlife species likely to traverse the area would

be active. Lighting would be directed toward the Project impact area and away from the surrounding habitats to minimize potential impacts to wildlife movement in the area. Lighting would only be used as needed to minimize potential long-term effects to wildlife movement. Therefore, impacts to wildlife corridors and habitat linkages would be less than significant.

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

No Impact. A significant impact may occur if a Project were to cause an impact that would be inconsistent with local regulations pertaining to biological resources, such as the City Protected Tree Ordinance (Ordinance No. 177404).

Protected trees, as defined in the City of Los Angeles Protected Tree Ordinance do not occur within the Project site (Appendix C). In addition, four tree reports were prepared in 2019 by Tree Resource for each of the proposed residences and included as Appendix C to this IS/MND. Per these reports, there are no trees on site that would be protected by the City of Los Angeles Native Tree Protection Ordinance. There are six Non-Protected Significant trees present at the Project site. However, these trees will be removed and replaced at a one-to-one (1:1) ratio per the proposed Landscape Plan (Appendix D). Therefore, impacts related to tree protection policies or ordinances would be considered less than significant.

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

No Impact. A significant impact would occur if a Project were inconsistent with policies in any draft or adopted conservation plan.

The Brentwood-Pacific Palisades Community Plan does not designate any portions of the Community Plan Area as being within a habitat conservation plan (City of Los Angeles 1996). In addition, the Project area is not within any of the regional conservation plans designated by the state (CDFW 2019). As such, implementation of 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. Therefore, no impacts associated with inconsistency with an adopted plan would occur.

V. CULTURAL RESOURCES

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

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

No Impact. A significant impact may occur if grading or excavation activities associated with a Project would disturb historic resources that presently exist within the Project site.

A historical resource is defined by Public Resources Code (PRC) Section 21084.1 and CEQA Guidelines Section 15064.5 as any resource listed or determined to be eligible for listing in the National Register of Historic Places as well as some California State Landmarks and Points of Historical Interest. In addition, historical resources are evaluated against the California Register of Historical Resources criteria prior to making a finding as to the Project's impacts on historical resources. Generally, resources must be at least 50 years old to be considered for listing in the California Register of Historical Resources as a historical resource. A significant adverse effect would occur if a project were to adversely affect an historical resource as defined by PRC Section 21084.1 and Section 15064.5 of the state CEQA Guidelines.

On July 22, 2020 a search was conducted of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton of the Project site and a one-half mile buffer record search area. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. The results of the records search were outlined in the Cultural Resources Record Search Results for the Revello Drive and Tramonto Drive Residential Project (Cultural Resources Record Search Report), prepared by Dudek on July 23, 2020 and included as Appendix E of this IS/MND.

The SCCIC records indicate that 31 cultural resources studies have been conducted within one-half mile of the Project site. However, the proposed Project site has not been subject to any previous investigations. SCCIC records indicate that a total of seven previously recorded cultural

resources fall within 0.5-mile of the Project site. The seven resources include three prehistoric resources and four historic built environment resources. However, none of these records were identified within the Project site. Therefore, because the Project site is currently undeveloped, and because no historic resources were identified on-site during the CHRIS records search, no impacts associated with historical resources would be occur.

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

Less-Than-Significant Impact with Mitigation Incorporated. A significant impact may occur if grading or excavation activities associated with a Project would disturb archaeological resources which presently exist within the project site.

As previously discussed, a search was conducted of CHRIS records at the SCCIC of the proposed Project site and a one-half-mile records search area. SCCIC records indicate that a total of seven previously recorded cultural resources are within one-half-mile of the Project site, although none of which were identified within the Project site. Seven previously recorded cultural resources fall within one-half-mile of the Project site. The seven resources include three prehistoric resources and four historic built environment resources. However, none of these resources are located within the Project site.

Further, due to the moderate to steep hillside topography in the Project area, it is unlikely that grading and excavation activities will encounter intact archaeological deposits. Despite the negative findings of the records search and however unlikely due to the moderate to steep hillside topography in the Project area, there is the possibility that intact archaeological deposits are uncovered during grading and excavation activities. For this reason, the Project site should be treated as potentially sensitive for archaeological resources. MM-CUL-1 is recommended to reduce potential impacts to unanticipated archaeological resources to less than significant. With the incorporation of mitigation, impacts associated with archaeological resources would be less than significant.

MM-CUL-1 If archaeological and/or tribal cultural resources (i.e., sites, features, or artifacts) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, and/or a tribal cultural resources specialist can evaluate the significance of the find and determine whether additional study is warranted. Depending on the significance of the find under the California Environmental Quality Act (CEQA) (14 California Code of Regulations Section 15064.5(f); California Public Resources Code (PRC) Section 21082), the archaeologist and/or tribal cultural resources specialist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan and data recovery may be warranted.

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

Less-Than-Significant Impact. A Project-related significant adverse effect may occur if grading or excavation activities associated with a Project would disturb previously interred human remains.

In the highly unlikely event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code, Section 7050.5; PRC Section 5097.98; and CEQA Guidelines, Section 15064.5(e). Pursuant to these codes, in the event that human remains are discovered, disturbance of the site shall remain halted until the Los Angeles County Coroner (Coroner) has conducted an investigation into the circumstances, manner, and cause of death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The Coroner is required to make a determination within 2 working days of notification of the discovery of the human remains. If the Coroner determines that the remains are not subject to his or her authority and if he or she recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission by telephone within 24 hours, to designate a Most Likely Descendant who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the Most Likely Descendant's recommendations, the owner or the Most Likely Descendant may request mediation by the Native American Heritage Commission. Therefore, with compliance with this existing state law, impacts associated with human remains would be less than significant.

VI. ENERGY

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

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

Less-Than-Significant Impact. A significant impact would occur if the Project would substantially increase demand for energy resources, exceeding the available supply.

Construction

Construction of the Project would require the use of electric power for as-necessary lighting and electronic equipment. The amount of electricity used during construction would be minimal because typical energy demand stems from the use of electrically powered equipment. This electricity demand would be temporary and would cease upon completion of construction. Therefore, the Project would not adversely impact the available electricity supply. During construction, natural gas would typically not be consumed on the Project site. The majority of the energy used during construction would be from petroleum.

Petroleum would be consumed throughout construction of the Project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon completion of construction. In addition, construction activities would be subject to compliance with applicable requirements designed to reduce the consumption of energy resources. Specifically, the Project would be required to comply with the California Air Resources Board (CARB) Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to 5 minutes. Compliance with the Airborne Toxics Control Measure would reduce the Project's reliance on petroleum-based fuel during construction activities, and the Project's consumption of petroleum-based fuels would not have an adverse impact on the available supply. Therefore, impacts would be less than significant.

Operational

The Project would require electricity, natural gas, and petroleum during operations. For the reasons discussed below, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources.

Electricity

The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City, serving approximately 4 million people within a service area of approximately 465 square miles. Electrical service provided by LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project site is located within LADWP's Metropolitan Planning District.

According to LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP has a generation capacity greater than 7,531 megawatts (MW). In 2017, the LADWP power system experienced an instantaneous peak demand of 6,555 MW (LADWP 2017). Given that LADWP is capable of generated approximately 15% more energy than peak demand (7,531 MW) vs. 6,555 MW), there would be enough generation capacity to serve an additional four new single-family homes.

Further, the Project would be required to comply with the 2019 Title 24 standards or the most recent standards at the time of building permit issuance. The energy-using fixtures in the Project would likely be newer technologies, using less electric power. In addition, the LADWP is required to procure at least 33% of their energy portfolio from renewable sources by 2020. The current renewable energy sources used by LADWP include wind, solar, and geothermal sources. These sources account for 32% of LADWP's overall energy mix in 2018, the most recent year for which data are available (CEC 2019). As such, the Project's estimated electricity consumption would likely be lower than that forecasted. Therefore, the Project would not result in the inefficient or wasteful use of electricity.

Natural Gas

Natural gas is provided to the Project site by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border (SoCalGas 2018). The traditional southwestern United States sources of natural gas will continue to supply most of SoCalGas's natural gas demand (California Gas and Electric Utilities 2018). The California Public Utilities Commission (CPUC) regulates California natural gas rates and natural gas services, including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing (CPUC 2019).

Although the Project would require natural gas for building heating, the Project would comply with 2019 Title 24 building energy efficiency standards, reducing energy use in the state. In addition, the Project would implement all applicable mandatory measures within the LA Green Building Code, which would have the effect of reducing the Project's energy use. The Project would generate a need for natural gas that is consistent with single-family homes, and due to compliance

with energy-reducing measures and improvements in technology, the Project would likely require less energy than existing single-family homes in the surrounding area. Based on compliance with California Public Utilities Commission (CPUC) regulations, Title 24, and the LA Green Building Code, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, the Project would not result in the inefficient or wasteful use of electricity.

Petroleum

During operations of the Project, the majority of fuel consumption would involve the use of motor vehicles traveling to and from the Project site. According to the California Energy Commission (CEC), transportation accounted for 38.5% of California's total energy consumption in 2015 (CEC 2018). However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and greenhouse gases (GHGs) from the transportation sector, and reduce vehicle miles traveled. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels (CEC 2016).

Over the lifetime of the Project, the fuel efficiency of vehicles being used by residents is expected to increase. As such, the amount of petroleum consumed as a result of vehicle trips to and from the Project site is expected to decrease during the lifetime of the Project. Therefore, the Project would not result in the inefficient or wasteful use of petroleum.

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

Less-Than-Significant Impact. As discussed under Threshold a), above, the Project would not result in wasteful, inefficient, and unnecessary consumption of energy during construction or operation. The Project would comply with CARB's Airborne Toxics Control Measure, Title 24 standards, and the LA Green Building Code. The use of energy provided by renewable energy resources is constrained by the energy portfolio mix managed by LADWP. As previously addressed, LADWP is required to procure at least 33% of their energy portfolio from renewable sources by 2020. As of 2018, the most recent year for which data is available, its existing renewable energy resources included wind, solar, and geothermal sources, which accounted for 32% of its overall energy mix (CEC 2019). This represents the available off-site renewable sources of energy that would meet the Project demand. However, it should be noted that the proposed single-family residence's energy demand represents a nominal percentage of LADWP's instantaneous peak demand. As such, the Project would not conflict with LADWP's renewable energy plan. Therefore, impacts associated with conflict with a state or local renewable energy or energy efficiency plan would be less than significant.

VII. GEOLOGY AND SOILS

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

In 2015, in *California Building Industry Association v. Bay Area Air Quality Management District (CBI v. BAAQMD)*, the California Supreme Court held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users

of the Project. The decision held that an impact from the existing environment to the Project, including future users and/or residents, is not an impact for purposes of CEQA; however, if the Project, including future users and residents, exacerbates existing conditions, that impact must be assessed, including how it might affect future users and/or residents of the Project. Thus, in accordance with Appendix G of the CEQA Guidelines and the *CBIA v. BAAQMD* decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts.

Initially, one geology and geotechnical report was prepared for the proposed stabilization and development of each home. However, at the request of the City of Los Angeles, Department of Building and Safety, Grading Division, these four reports were consolidated into one initial report prepared by Stoney-Miller Consultants, Inc. dated October 24, 2019 and are available for review at the City. Additional reports have since been prepared and submitted to address their questions and comments. All supplemental reports cover all four proposed homes. The initial and supplemental geology and soils reports prepared for the Project are collectively referred to as “the Tramonto and Revello Geology and Soils Reports”. The Grading Division has issued an approval letter that approves the geologic recommendations contained in the Tramonto and Revello Geology and Soils Reports approved September 14, 2020 (Appendix F).

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. A significant impact may occur if a Project site is located within a state-designated Alquist-Priolo Zone or other designated fault zone.

The Alquist-Priolo Earthquake Fault Zoning Act requires the state geologist to establish regulatory zones, known as “earthquake fault zones,” around the surface traces of active faults and to issue appropriate maps to cities or counties for planning and zoning purposes. According to the California Department of Conservation Seismic Hazard Zones Map, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. No known active faults cross the Project site. The closest fault to the Project site is the Topanga-Beverly Hills Fault, located approximately 1.8 miles southeast of the site (CGS 2020). Given that no known active faults underlie the Project site, the potential for on-site surface rupture is low. The Project would not exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Therefore, impacts associated with fault rupture would not occur.

ii) Strong seismic ground shaking?

No Impact. A significant impact may occur if a Project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground-shaking hazards.

The 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, all of which have the potential to create unstable seismic conditions that could be exacerbated by seismic ground shaking. In addition, no known active faults with the potential for surface fault rupture are known to pass directly beneath the Project site. The Project would not exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible to substantial adverse effects, including strong seismic ground shaking. Therefore, impacts associated with seismic ground shaking would not occur.

iii) Seismic-related ground failure, including liquefaction?

No Impact. A significant impact may occur if a Project site is located in an area that is identified as having a high risk of liquefaction and associated ground failure.

Soil liquefaction most commonly occurs when ground shaking from an earthquake causes a sediment layer saturated with groundwater to lose strength and take on the characteristics of a fluid, thus becoming similar to quicksand. Liquefaction may also occur in the absence of a seismic event, when unconsolidated soil above a hardpan becomes saturated with water. Factors determining the liquefaction potential are the level and duration of seismic ground motions, the type and consistency of soils, and the depth to groundwater. Loose sands and peat deposits, uncompacted fill and other Holocene materials deposited by sedimentation in rivers and lakes (fluvial or alluvial deposits), and debris or eroded material (colluvial deposits) are the most susceptible to liquefaction.

Based on the California Geological Survey mapped earthquake hazard zones, the Project site is not located within an area of liquefaction (CGS 2020). This classification is consistent with the Tramonto and Revello Geology and Soils Reports, which states that the Project site is not located within a zone mapped for liquefaction hazards (Appendix F). Therefore, the Project would not exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible to substantial adverse effects, including seismic-related ground failure. Therefore, impacts associated with seismic-related ground failure, including liquefaction, would not occur.

iv) Landslides?

Less-Than-Significant Impact. A significant impact may occur if a Project site is located in a hillside area with soil conditions that would suggest a high potential for landslides.

The California Geologic Survey indicates the Project site is located within a landslide zone (CGS 2020). However, the Project will be required to implement the City-approved recommendations contained in Tramonto and Revello Geology and Soils Reports (Appendix F). Per the City-approved recommendations, the Project includes certain ground improvements that would remediate and eliminate any slope failures from occurring on the Project site. These ground improvements would consist of placing several rows of shear pins or piles at specific areas on the hillside as well as performing remedial grading to remove a certain amount of the landslide debris on the Project site. These piles would stabilize the Project site as well as support the proposed homes and roadways. Furthermore, the Project would comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety and the Bureau of Engineering. Through compliance with applicable regulatory requirements, the Project would not exacerbate, cause, or accelerate geologic hazards related to landslides. As such, the likelihood

for landslide occurrence is considered low. Therefore, impacts associated with landslides would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project exposes large areas to the erosion-inducing effects of wind or water for an extended period of time.

Project construction would involve activities such as excavation and grading that could result in soil erosion. The Project would comply with the applicable requirements of the CBC, Los Angeles Uniform Building Code (UBC), and Los Angeles Regional Water Quality Control Board (RWQCB) during Project construction and operation. The Project would be required to implement a stormwater pollution prevention plan, which requires adoption of an erosion control plan to reduce the potential for erosion and sedimentation to occur during Project construction. Furthermore, Ordinance 172.673 of the City's UBC requires that best management practices (BMPs) be incorporated into plan documents to control stormwater pollution from sediments, erosion, and construction materials leaving the construction site. As such, existing regulatory and statutory requirements would reduce short-term erosion impacts, which could result from Project construction. Lastly, similar to many other development projects proposed throughout the City, the Project will be conditioned to provide signage at the Project site containing contact information for the Street Senior Use Inspector (Department of Public Works), the Senior Grading Inspector, and the hauling or general contractor, so that if evidence of erosion is apparent, the public could contact the appropriate individuals who can address the issue. Therefore, impacts associated with soil erosion and topsoil loss would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to be built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

As discussed under Threshold a) iv), above, the Project site is located within a landslide zone and the site has been subject to previous historical landslides. Thus, unstable soils are currently present at the Project site, and could be subject to future landslides if left unaddressed and not remediated. Per the City-approved geologic recommendations, the Project will incorporate specific measures to ensure that any landslide impacts or impacts resulting from unstable soils will not occur.

In addition, all required excavations would be sloped or properly shored in accordance with the provisions of the California Building Code and additional Los Angeles UBC requirements, as applicable to the Project. Compliance with regulatory requirements would ensure that building design and construction is attuned to site-specific conditions, including building foundation requirements.

Pursuant to LAMC Section 13.20.D.4(a), a Haul Route Approval from the BBSC is required because the Project proposes the import and/or export of 1,000 cy or more of earth material in a Hillside and Special Grading Area. Hauling operations and construction activities would be

conducted in accordance with an approved Haul Route, which will be established by the City to avoid geologic impacts related to heavy loads on local streets.

Specifically, there are certain requirements set forth by the City for residential hillside development that are designed to prevent street damage such as potholes. These requirements include:

- 10-wheeler dump trucks (with a 10 CY capacity) or smaller are the only type of trucks permitted for hauling of earth. If the project required a Haul Route approval, the BBSC may authorize other types of hauling vehicles
- A grouping or convoy of hauling vehicles is not allowed; only one hauling vehicle is permitted per Project site at any one time.

Adherence with these requirements established by the City will help to avoid geologic and street damage impacts related to heavy loads on local streets. Therefore, impacts associated with soil stability would be less than significant.

d) Be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less-Than-Significant Impact. A significant impact may occur if a Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for Project buildings, thus posing a hazard to life and property.

Expansive soils shrink and swell as a result of moisture change. These volume changes can result in damage over time to building foundations, underground utilities, and other subsurface facilities and infrastructure if they are not designed and constructed appropriately to resist the damage associated with changing soil conditions. Expansive soils are often associated with soils with high clay materials content.

According to the Tramonto and Revello Geology and Soils Reports (Appendix F), expansive soils are present on-site and are likely to have severe soluble sulfate concentrations and be corrosive to buried metals. However, the Project will be required to implement the City-approved recommendations contained in the Tramonto and Revello Geology and Soils Reports approved September 14, 2020 that address potential impacts resulting from expansive soils (Appendix F). For instance, per the City-approved recommendations, building foundations would be required to be designed in accordance with Section 1808.6 of the CBC, which considers expansion potential of the sub-grade soils and other appropriate soil related criteria. In addition to the CBC, the Project would be required Los Angeles UBC requirements, as applicable to the Project. Compliance with regulatory requirements would ensure that building design and construction is attuned to site-specific conditions, including building foundation requirements. Moreover, the four proposed homes would be fully supported by deepened foundations (i.e., piles) that derive all their support from competent bedrock. Therefore, impacts associated with expansive soils would be less than significant.

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

No Impact. This question would apply to a Project only if it were located in an area not served by an existing sewer system.

The Project site is located within a developed area, and the Project would connect directly to the municipal sanitary sewer system. No septic tanks or alternative wastewater disposal systems would be used on the Project site. Therefore, impacts associated with the underlying soils' ability to support a septic system would not occur.

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

Less-Than-Significant Impact with Mitigation Incorporated. A significant impact may occur if grading activities associated with a project were to disturb paleontological resources or geologic features that presently exist within the Project site.

As shown on Figures CR-2 of the Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, there are no known vertebrate paleontological resources on or around the Project site; however, according to Figure CR-3, the soils on the Project site is where fossils are likely to be found (City of Los Angeles 1995). Thus, it is unlikely that previously unknown paleontological resources or unique geologic features would be encountered during future site grading and construction.

Nonetheless, as is the case with most other development projects that involve earthwork activity, there is always a possibility that subsurface construction activity could unearth a potentially significant paleontological resource. MM-GEO-1 would be required to ensure that subsurface construction activity complies with the standard procedures for treatment of unanticipated discoveries of paleontological resources. With the incorporation of mitigation, impacts associated with paleontological resources would be less than significant.

MM-GEO-1 In the event that paleontological resources (i.e., fossil remains) are exposed during construction activities for the proposed Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology's 2010 guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the qualified paleontologist may record the find and allow work to continue or may recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 2010 guidelines and shall be subject to review and approval by the City of Los Angeles. Work in the area of the find may only resume upon approval of a qualified paleontologist.

VIII. GREENHOUSE GAS EMISSIONS

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

The following section summarizes and incorporates the reference information from the Air Quality and Noise Impact Assessment prepared by Z Consulting Company, dated April 8, 2019 and included within Appendix A of this IS/MND.

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

Less-Than-Significant Impact. A Project would have a significant impact with respect to GHG emissions and global climate change if it would generate substantial gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Construction

For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon “threshold of significance” by which to measure an impact; however, the SCAQMD has convened a GHG CEQA Significance Threshold Working Group to provide guidance to lead agencies in determining whether GHG impacts resulting from new development projects are significant. On December 5, 2008, the SCAQMD established interim GHG significance thresholds through its document Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans (SCAQMD 2008). The primary objective of this document was to establish thresholds for use in CEQA analyses that would help achieve a performance standard or target GHG reduction objective, which would ultimately reduce GHG emissions. The interim guidance indicates that a GHG emissions threshold of 3,000 metric tons (MT) of carbon dioxide equivalent (CO₂e) per year is appropriate for residential projects. While the SCAQMD recommends that GHG emissions from construction should be amortized over 30 years and added to operational GHG emissions to determine the overall Project impact, this approach is not suitable for residential projects, as they produce extremely low amounts operational GHG emissions; instead, the GHG emissions that occur in the peak year of construction are compared directly to the threshold, resulting in a more conservative significance determination.

Construction phase GHG emissions are also calculated by CalEEMod. Maximum daily CO₂e emissions are multiplied by the total number of construction days to determine the annual emissions. Table 8 presents the construction phase CO₂e emissions and compares them to the significance threshold of 3,000 MT CO₂e/year. Although the significance threshold is meant to be applied to a single year of emissions, emissions from the entire duration of construction (i.e., more than 1 year) are conservatively utilized to determine significance.

TABLE 8. PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS

Source	Total CO ₂ e Emissions (MT/year)
Project Construction Phase	854
Significance Threshold (Residential)	3,000
Significant Emissions?	No

Sources: Appendix A; SCAQMD 2008.

Notes: CO₂e = carbon dioxide equivalent; MT = metric tons.

As shown in Table 7, the Project would generate approximately 854 MT CO₂e/year in total for peak year of construction. This amount is less than the SCAQMD threshold of 3,000 MT/year CO₂e. Therefore, construction impacts associated with generation of GHG emissions would be less than significant.

Operational

Once operational, the Project would generate nominal GHG emissions from area sources, energy, and mobile source emissions. The Project's operational emissions would be minimal due to the non-commercial/non-industrial nature of residential uses, which do not generate substantial amounts stationary and mobile emissions due to the nominal amount of on-site users. In addition, the Project would comply with applicable requirements set forth by the LA Green Building Code (Ordinance 181480), which serves to increase energy conservation and efficiency within the City by regulating projects that involve construction of new buildings, additions, alterations with building valuations of \$200,000 or more, and residential alterations that increase the building's conditioned volume. The LA Green Building Code also incorporates applicable provisions of CALGreen. Adherence to the LA Green Building Code would help ensure that the GHG emissions generated by the Project would be minimized to the extent feasible. Therefore, long-term impacts associated with generation of GHG emissions would be less than significant.

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

Less-Than-Significant Impact. A Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the CEQA Guidelines.

In May 2007, the City adopted Green LA – An Action Plan to Lead the Nation in Fighting Global Warming (Green LA Climate Action Plan), which set forth the goal of reducing City GHGs by up to 35% below 1990 levels by 2030 (City of Los Angeles 2007). The City's Green LA Climate Action Plan GHG reductions are based on actions in key sectors, including energy, water, transportation, waste, the Port of Los Angeles, airports, open space and greening, green economy, and adaptation strategies.

In 2019, the City adopted the Green New Deal, which is a four-year update to the Los Angeles Sustainable City pLAn, adopted on April 8, 2015. The City's Green New Deal is guided by four key principles: a commitment to uphold the Paris Climate Agreement; a promise to deliver environmental justice and equity through an inclusive green economy; a plan to ensure every Angeleno has the ability to join the green economy by creating pipelines to good paying, green jobs; and a determination to lead by example within City government, showing the world what an urban Green New Deal looks like in practice. Goals and targets include (City of Los Angeles 2019):

- Building a zero-carbon electricity grid — reaching an accelerated goal of 80% renewable energy supply by 2036, toward 100% renewables by 2045.
- Creating a Jobs Cabinet to bring city, labor, educational, and business leaders together to support efforts to create 300,000 green jobs by 2035 and 400,000 by 2050.
- Mandating that all new municipally owned buildings and major renovations be all-electric, effective immediately, and that every building in Los Angeles — from skyscrapers to single family homes — become emissions free by 2050.
- Achieving a zero-waste future by phasing out Styrofoam by 2021, ending the use of plastic straws and single-use takeout containers by 2028, and no longer sending any trash to landfills by 2050.
- Recycling 100% of wastewater by 2035; sourcing 70% of our water locally — a significant increase from the existing pathway; and nearly tripling the maximum amount of stormwater captured.
- Planting and maintaining at least 90,000 trees — which will provide 61 million square feet of shade — citywide by 2021 and increasing tree canopy in low-income, severely heat impacted areas by at least 50% by 2028.

As mentioned previously, the LA Green Building Code (Ordinance 181480) also serves to increase energy conservation and efficiency within the City by regulating projects that involve construction of new buildings, additions, alterations with building valuations of \$200,000 or more, and residential alterations that increase the building's conditioned volume. The LA Green Building Code also incorporates applicable provisions of CALGreen.

The Climate Change Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations. Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-global-warming-potential GHGs in consumer products) and changes to the vehicle fleet (hybrid, electric, and more fuel-efficient vehicles) and associated fuels, among others. To the extent that these regulations are applicable to the Project, its inhabitants, or uses, the Project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Regarding consistency with post-2020 statewide targets, specifically Senate Bill 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory to meet these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014). Further, in January 2017, CARB released the 2017 Climate Change Scoping Plan Update (Second Update) for public review and comment. The Second Update replaced the initial Scoping Plan's reduction goal with a recommendation to aim for a community-wide goal of no more than 6 MT CO_{2e} per capita by 2030 and no more than 2 MT CO_{2e} per capita by 2050. The Second Update also recommends additional strategies for implementation at the statewide level to meet the goals of AB 32, SB 32, and executive orders (CARB 2017). The Project would not interfere with implementation of any of the above-described GHG emissions reduction goals for 2030 or 2050 because the Project's GHG emissions would not exceed SCAQMD's draft interim threshold of 3,000 MT CO_{2e} per year. This threshold was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Because the Project would not exceed the threshold, this analysis provides support for the conclusion that the Project would not impede the state's trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050.

In summary, the Project would be required to comply with all applicable provisions, including sustainability features, set forth by the LA Green Building Code, Green LA Climate Action Plan, and the Green New Deal. Adherence with these applicable regulations would be confirmed by the City during the plan check phase prior to issuance of building permits. Further, the Project would not conflict with the state's Scoping Plan or GHG reduction goals for 2030 or 2050. Therefore, impacts associated with conflicts with applicable GHG plans, policies, and regulations would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

As previously discussed, in 2015, in *CBIA v. BAAQMD*, the California Supreme Court held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the Project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment on the Project, including future users and/or residents, is not an impact for the

purposes of CEQA; however, if the Project, including future users and residents, exacerbates existing conditions, that impact must be assessed, including how it might affect future users and/or residents of the Project. For example, if Project construction on a hazardous waste site would cause the potential dispersion of hazardous waste into the environment, the EIR should assess the impacts of that dispersion on the environment, including on the Project's residents. Thus, in accordance with Appendix G of the CEQA Guidelines and the *CBIA v. BAAQMD* decision, the Project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts:

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

Less-Than-Significant Impact. A significant impact may occur if a Project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction

Construction of the Project would involve the use of potentially hazardous materials associated with the construction of residential development, including vehicle fuels, oils, and transmission fluid, on the Project site. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products to operate and maintain construction equipment. Handling these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the Project.

Although these materials would likely be stored on the Project site, storage would be required to comply with the guidelines set forth by each product's manufacturer, as well as in accordance with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the Project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the U.S. Environmental Protection Agency (EPA), the California Department of Toxic Substances Control, California Occupational Safety and Health Administration, California Department of Transportation, SCAQMD, Los Angeles Fire Department (LAFD), and the Resource Conservation and Recovery Act. Therefore, construction impacts associated with the transport, use, or disposal of hazardous materials would be less than significant.

Operations

During the operation of the Project, no hazardous materials other than typical household cleaning supplies and solvents used for housekeeping and maintenance activities would routinely be used on the Project site. Although these materials would vary, they would generally include cleaning products, solvents, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and universal wastes by the EPA, which considers these types of wastes common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2018). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of under less-stringent standards than other hazardous wastes, and many of these wastes do not need to be managed as hazardous

waste. Therefore, long-term impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project could pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions.

Construction

Construction at the Project site would involve the temporary use of hazardous and/or flammable materials, including diesel fuel, gasoline, and other oils and lubricants. Although use of these hazardous materials during Project construction could result in their being released into the environment, the use, storage, transport, and disposal of these materials would comply with all existing federal, state, and local regulations, as previously described. In addition, the City of Los Angeles Fire Department (LAFD) regulates the use and storage of hazardous substances and responds to hazardous materials release incidents in the City. In the event that services are required, the LAFD Hazardous Materials Unit would dispatch members to ensure that any spill or unauthorized releases would be properly removed, handled, transported, and disposed of (LAFD 2020a). Therefore, construction impacts associated with the accidental release of hazardous materials would be less than significant.

Operations

Potentially hazardous materials associated with operation of the Project, as a residential land use, would include those materials typically associated with cleaning and maintenance activities. Although these materials would vary, they would generally include household cleaning products, solvents, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and universal wastes by the EPA, which considers these types of wastes common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2018). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of under less-stringent standards than other hazardous wastes, and many of these wastes do not need to be managed as hazardous waste. Therefore, long-term impacts associated with the accidental release of hazardous materials would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project site is located within 0.25 miles of an existing or proposed school site and is projected to release toxic emissions that pose a health hazard beyond regulatory thresholds.

Land uses and activities typically associated with hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste include heavy commercial, manufacturing, research, and industrial uses. The Project would not include any such uses or activities.

The nearest school to the Project site is Westside Waldorf School (17310 Sunset Boulevard), located approximately 0.27 miles northeast of the Project site. Although this school is within close proximity to the Project, compliance with applicable regulations governing the use, storage, transport, and disposal of hazardous materials would ensure the Project does not emit hazardous emissions (see Thresholds a) and b), above). In addition, as a residential use, the Project would not handle hazardous materials that pose a significant threat to human health. Therefore, impacts related to hazardous materials and schools would be less than significant.

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

No Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a Project site were included on any of the above lists and posed an environmental hazard to surrounding sensitive uses.

Based on a review of the City's ZIMAS web application, the Project site is not located on a hazardous waste property, methane hazard site, or consist of any oil well (City of Los Angeles 2020a). A search of federal, state, and local databases regarding hazardous material releases and site cleanup lists was conducted for the Project site and determined that the Project site was not located on a hazardous materials site pursuant to Government Code Section 65962.5 (DTSC 2020, SWRCB 2020a, 2002b, 2020c, CalEPA 2020). More specifically, according to EnviroStor, there are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup Sites) on, in, or under the Project (DTSC 2020). According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites, waste discharge requirement sites, permitted underground storage tank facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in, or under the Project Site (SWRCB 2020a). Therefore, the Project would not create a significant hazard to the public or the environment. Therefore, impacts associated with hazardous materials sites would not occur.

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

No Impact. A significant Project-related impact may occur if a Project were placed within a public airport land use plan area, or within 2 miles of a public airport, and subject to a safety hazard.

Based on a review of the City's ZIMAS web application, the Project site is not located within an airport hazard area (City of Los Angeles 2020a). The nearest airport to the Project site is the Santa Monica Municipal Airport (3233 Donald Douglas Loop S), which is located approximately 6 miles southeast of the Project site. The Project would not be located within an airport land use plan or within 2 miles of a public airport or public use airport (Los Angeles County Airport Land Use Commission 2004). Therefore, impacts associated with public airport hazards would not occur.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan.

The City's Emergency Operations Plan (EOP) set forth procedures for City personnel to follow in the event of an emergency situation stemming from natural disasters, technological incidents, nuclear defense operations, and other unforeseeable disasters or crises (City of Los Angeles 2018). According to the Safety Element of the City General Plan, Sunset Boulevard, located 0.23 miles southeast of the site, is a selected disaster route (City of Los Angeles 1996a). Development of the Project site may require temporary and/or partial local street closures due to construction activities, although no closure of Sunset Boulevard would be required. While temporary closures of local streets may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans, and any planned closure are required to be coordinated with the City's emergency services prior to implementation.

Pursuant to LAMC Section 13.20.D.4(a), a Haul Route Approval from the BBSC is required because the Project proposes the import and/or export of 1,000 CY or more of earth material in a Hillside and Special Grading Area. Hauling operations and construction activities would be conducted in accordance with the approved Haul Route, which will be established by the City to ensure safe circulation on local streets during construction and hauling activities.

In addition, all projects undergoing new construction or additions of more than 1,000 square feet, located within hillside communities, would be required to prepare a Transportation Management Plan (TMP) that identifies measures to offset access, circulation, and parking issues. Once prepared, the TMP shall be submitted to LADOT for review and approval (City of Los Angeles 2020d). The TMP prepared for the Project has been included as Appendix H of this IS. Incorporation of the safety requirements outlined in the TMP would ensure the Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan (see Section XVII, below, for additional information regarding the TMP).

The Project would also be required to submit final driveway and street improvement plans and internal circulation plans to the City Department of Public Works for review and approval, ensuring that site driveway access and internal site vehicular movement is designed in accordance with City design requirements related to emergency vehicle access. Prior to obtaining a building or construction permit, LAFD Development Services Unit conducts Fire Life Safety Plan Check and Fire Life Safety Inspections interpreting and enforcing the applicable standards of the Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling (LAFD 2020b). Additionally, the Development Review Division of the City's Department of Transportation is responsible for reviewing and approving site plans, and roadway and traffic signal plans (Los Angeles Department of Transportation 2020a).

The City Department of Transportation and LAFD would be responsible for ensuring that future development does not impair or physically interfere with an adopted emergency response or evacuation plan. As part of standard development procedures, plans would be submitted to the City Department of Transportation and LAFD for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with City

regulations. Specifically, LAFD would review the site plans and Project ingress/egress, and, if any concerns are raised, LAFD may require that the Project applicant develop an emergency response plan or similar document that identifies mapping of emergency exits, evacuation routes, and the location of nearest hospitals and fire stations. As such, Project implementation would not interfere with an emergency response plan due to existing regulatory/statutory requirements and consultation with LAFD.

Overall, due to the proposed low intensity land use, and because the City Department of Transportation, LADOT, and LAFD will thoroughly review the site plans prior to Project implementation, the Project would not introduce any features that would preclude implementation of or alter these policies or procedures. Therefore, impacts associated with an adopted emergency response or emergency evacuation plan would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard that could affect persons or structures in the area in the event of a fire.

The Project is located within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2020). VHFHSZs are defined as lands designated by LAFD pursuant to California Government Code 51178 that were identified and recommended to local agencies by the Director of the California Department of Forestry and Fire Protection (CAL FIRE) based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The VHFHSZ was first established in the City in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone.” According to the Safety Element of the City General Plan, the Project site is within Mountain Fire District zone, which require additional fire hazard requirements per Los Angeles City Fire Code Section 57.25 (City of Los Angeles 1996b; City of Los Angeles 2005).

Fire suppression services in the Project area would be provided by LAFD. In addition, the City has entered into mutual aid agreements with other jurisdictions for cooperative response and management of wildfires (City of Los Angeles 1996a). The nearest fire units, regardless of jurisdictional boundaries, are able to respond to fire events under these agreements. Although the Project site is within a VHFHSZ, the Project would be required to conform with all applicable fire code regulations to reduce the Project’s potential for exacerbating existing environmental conditions. Further, as previously discussed, the LAFD would review the site plans and Project ingress/egress, and, if any concerns are raised, LAFD may require that the Project applicant develop an emergency response plan or similar document that identifies mapping of emergency exits, evacuation routes, and the location of nearest hospitals and fire stations. Therefore, impacts associated with wildland fires would be less than significant.

X. HYDROLOGY AND WATER QUALITY

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

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to discharge water that does not meet the quality standards of agencies that regulate surface or groundwater quality and water discharge into stormwater drainage systems.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Project include (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earthmoving activities that, when not controlled, may generate soil erosion via stormwater runoff or mechanical equipment.

Construction materials would be handled, stored, and disposed of in accordance with all applicable regulations to reduce the potential release of pollutants into the environment. Other construction-related impacts would not be considered significant upon compliance with water quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Applicable regulations with regard to surface water quality are governed by the State Water Resources Control Board and its nine regional boards. The Project site lies within the Los Angeles RWQCB and would be required to obtain a National Pollutant Discharge Elimination System (NPDES) Permit.

Prior to issuance of a grading permit, the Project applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Project applicant shall provide the Waste Discharge Identification Number to the City to demonstrate proof of coverage under the Construction General Permit. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Implementation of the BMPs identified in the SWPPP, and compliance with the NPDES and City discharge requirements would ensure that the Project construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Therefore, construction impacts associated with violation of water quality standards or waste discharge requirements would be less than significant.

Operation

Under the existing conditions, the Project site is vacant and undeveloped. The highest point of the Project site is at its northern boundary along Tramonto Drive, sloping downwards and southerly towards Revello Drive. Thus, stormwater flows from north to south of the Project site. Construction of four single-family residences at the Project site would increase the amount of impervious surface on the Project site and has the potential to generate increased surface water runoff. However, the Project's potential impacts on surface water or groundwater runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures that would regulate the amount and water quality of stormwater leaving the Project site. More specifically, the Project would be required to comply with the City Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172176, October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181899) expanded LAMC Article 4.4 (City of Los Angeles 2011b). Chapter VI, Article 4.4 of the LAMC contains City stormwater and urban runoff pollution control

regulations that specify requirements for management of stormwater pollutants during construction and operation of projects through LID and BMPs. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183833, which incorporates the requirements of the Municipal Separate Storm Sewer System (MS4) Permit (City of Los Angeles 2015). The City's LID Ordinance expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan requirements by imposing rainwater LID strategies on projects that require building permits. The Project would be required to prepare a LID plan and demonstrate compliance with the LID requirements and standards and retain or treat the first 0.75 inches of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater (City of Los Angeles 2016c).

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City requires a stormwater observation report to be submitted to the City prior to the issuance of the certificate of occupancy. All projects reviewed and approved would require a stormwater observation report that would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a certificate of occupancy from the LA Department of Building and Safety, the Project would be determined to be in compliance with all applicable codes, ordinances, and other laws (City of Los Angeles 2016c).

Full compliance with the LID requirements and implementation of design related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, long-term impacts associated with violation of water quality standards or waste discharge requirements would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project would change potable water levels sufficiently to (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of important water, summer/winter peaking, or responding to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in a demonstrable and sustained reduction in groundwater recharge capacity.

According to the Tramonto and Revello Geology and Soils Reports (Appendix F), groundwater was encountered within various portions of the Project site at depths of 35 to 57 feet below grade. Therefore, as noted in these reports, drilling contractors will be made aware that groundwater may be encountered during construction. However, the Project site is not located in a basin prioritization area (California Department of Water Resources 2020) and is not considered a significant groundwater recharge area. Nonetheless, due to the presence of groundwater on-site, dewatering may occur if groundwater is encountered during trenching and excavation activities. However, if dewatering is required during construction of the Project, dewatering would be temporary, limited to the construction period, and would not occur in quantities that could substantially deplete groundwater supplies or interfere with groundwater recharge. If dewatering is required, the extracted groundwater would be treated for any contaminants, if

present, before being discharged to the storm drain system or to the sewer system in accordance with RWQCB permit requirements. The Applicant shall file a Notice of Intent to comply with the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters and would be required to comply with all applicable conditions of this permit.

Further, interference with groundwater recharge can occur when pervious areas that provide for recharge are covered with impervious surfaces as a result of urban development. The proposed Project would result in increased impervious surfaces at the site. However, the development footprint of the site is fairly small, and the Project is largely surrounded by development, which does not allow for groundwater recharge. Thus, due to its limited size and its location within an urbanized area, and the Project would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Through compliance with existing regulations, in the case any temporary dewatering is required during construction of the Project, the Project would not cause a decrease in groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, impacts associated with groundwater supplies would be less than significant.

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

i. Result in substantial erosion or siltation on- or off-site;

Less-Than-Significant Impact. A significant impact may occur if a Project would substantially alter drainage patterns, resulting in a significant increase in erosion or siltation during construction or operation of a Project.

There are no streams or rivers located on or near the Project site. Project construction would involve some earth-disturbing activities, including grading, that could expose on-site soils to erosion and surface water runoff. However, inclusion of Project BMPs would reduce erosion and siltation from the Project site occurring from construction activities. Although the Project would increase the amount of impervious area on the Project site, compliance with the NPDES permit and the City's LID requirements would control surface runoff. With incorporation of all applicable regulations related to stormwater runoff, the Project would not significantly alter the existing drainage pattern of the Project site or area in a manner that would result in on-site or off-site siltation or erosion. Therefore, impacts associated with altering of the existing drainage patterns and erosion would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to substantially alter drainage patterns, resulting in a significant increase in potential flooding.

As previously discussed, there are no streams or rivers located on or near the Project site. The Project would be required to comply with the NPDES permit, LID requirements, and implementation of design related BMPs to reduce off-site stormwater flows. With implementation of all required LID requirements and BMPs, the Project increase the rate or amount of surface runoff such that flooding would result on site or off site. Therefore, impacts associated with altering the existing drainage patterns and flooding would be less than significant.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less-Than-Significant Impact. A significant impact may occur if a Project were to substantially alter drainage patterns, resulting in a significant increase in potential flooding.

As addressed above, there are no streams or rivers located on or near the Project site. The Project would comply with City LID requirements and implementation of design related BMPs to reduce off-site stormwater flows. Construction of the proposed residential structures would increase the amount of impervious surface on the Project site, which has the potential to generate increased surface water runoff. An existing storm drain inlet is present to the southeast of the Project site, south of the existing portion of Revello Drive, and drains into an existing storm drain pipe that extends south towards PCH, southwest of the Project site, to the southern portion of Posetano Road. Per the Hydrology and Hydraulics Report prepared by VCA Engineers, Inc, dated July 21, 2020, and included as Appendix G, the existing inlet within the southeast of the Project site would either remain, be modified to align with the proposed roadway extension of Revello Drive, or removed and replaced with a City-standard side opening catch basin to collect stormwater and convey it to the existing storm drain line which runs south from Revello Drive. All three options would be reviewed by the City during the B-Permit approval process for the proposed roadway extension of Revello Drive. Per the Hydrology and Hydraulics Report (Appendix G), both the existing storm drain inlet and the storm drain catch basin would be adequately sized to convey the peak flow runoff during a 10- or 50-year storm event. Further, with implementation of BMPs and compliance with existing regulations related to stormwater drainage, the Project would not substantially change the drainage pattern on site or increase the rate or amount of surface runoff such that flooding would result on site or off site. Therefore, impacts associated with altering the existing drainage patterns and flooding would be less than significant.

iv. Impede or redirect flood flows?

Less-Than-Significant Impact. A significant impact may occur if a Project would impede or redirect flood flows.

Under the existing conditions, there are no streams or rivers located on the Project site. In addition, the Project site is located outside the 100-year floodplain (FEMA 2008). Therefore, the Project would not impede or redirect flood flows, and impacts would be less than significant.

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

No Impact. A significant impact could only occur if a Project were to be located in a tsunami, seiche, or flood hazard zone.

The Project site is located outside of the 100-year floodplain and not near an open water body; thus, the site is not located in a flood hazard zone (FEMA 2008) or subject to seiche. According to the Safety Element of the City General Plan, the Project site is not within a potential inundation area (City of Los Angeles 1996a). Exhibit G, Inundation and Tsunami Hazard Areas Map, of the Safety Element does not designate the Project site as being within a tsunami impact area or potential inundation area (City of Los Angeles 1996a). Although the Project site is located approximately 50 feet north of the Pacific Ocean, due to its elevation, the Project is not located in a tsunami impact area or hazard zone. Therefore, impacts associated with flood hazard, tsunami, or seiche zones would not occur.

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

Less-Than-Significant Impact. A significant impact could only occur if a Project were to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The Project would comply with regional and local regulations related to water quality control plans and would not obstruct existing plans. In addition, as discussed in Section 4.X(b), the Project would increase the amount of impervious surface on the Project site. Although groundwater was encountered within various portions of the Project site during the geologic field explorations performed on the Project site, the Project site is not located in a basin prioritization area, which would require a Sustainable Groundwater Plan (SGP) under the Sustainable Groundwater Management Act (SGMA) (California Department of Water Resources 2020). Therefore, the Project site is not considered a significant groundwater recharge area and no sustainable groundwater management plans overlay the Project site. Therefore, impacts associated with a water quality control plan or sustainable groundwater management plan would be less than significant.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Physically divide an established community?

No Impact. A significant impact may occur if a Project were sufficiently large enough or otherwise were configured in such a way as to create a physical barrier within an established community (a typical example would be a Project that involved a continuous right-of-way, such as a roadway, which would divide a community and impede access between parts of the community).

Projects that typically have the potential to physically divide an established community are projects such as railroads, highways, airports, stadiums, etc., none of which are proposed as part of the Project. The Project is located within an urbanized area in the City. The existing Project site is currently undeveloped and is surrounded by undeveloped land and single-family residential homes. Construction of the four new single-family residences would not physically divide this community. Although the Project would include an extension of Revello Drive of approximately 200 feet to the west, in order to provide access to the site, this proposed roadway would further connect and would not divide the neighborhood. No separation of uses or disruption of access between land use types would occur as a result of the Project. Accordingly, implementation of the Project would not disrupt or divide the physical arrangement of the established community. Therefore, impacts associated with division of an established community would not occur.

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

Less-Than-Significant Impact. A significant impact may occur if a project is inconsistent with the City General Plan or other applicable land use plans, policies, or regulations and would therefore cause adverse environmental effects that the General Plan or other plan is designed to avoid or mitigate.

The legal standard that governs consistency determinations is that a Project must only be in “harmony” with the applicable land use plan to be consistent with that plan. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland*, 23 Cal.App.4th 704, 717-18 (1993), upholding a city’s determination that a subdivision project was consistent with the applicable general plan.) As the

Court explained in *Sequoyah*, “state law does not require an exact match between a proposed subdivision and the applicable general plan.” To be “consistent” with the general plan, a project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning the project must be “in agreement or harmony with the applicable plan.” (See also *Greenebaum v. City of Los Angeles*, 153 Cal.App.3d 391, 406 (1984); *San Franciscans Upholding the Downtown Plan, supra*, 102 Cal.App.4th at p. 678.) Further, “[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment” (*Friends of Lagoon Valley v. City of Vacaville*, 154 Cal.App.4th 807, 817 (2007)). Courts also recognize that general plans “ordinarily do not state specific mandates or prohibitions,” but instead provide “policies and set forth goals” (*Friends of Lagoon Valley*).

Zoning Code

The Project site is zoned R1-1 (City of Los Angeles 2020a). Therefore, the Project site is subject to the requirements of the LAMC Section 12.08, “R1” One-Family Zone. Per Section 12.08 of the LAMC, the R1 zoning allows for one-family dwellings; parks, playgrounds, or community centers, owned and operated by a government agency; truck gardening; two-family dwellings; accessory buildings; accessory uses; name plates and signs; and backyard beekeeping. The R1 Zone has a minimum lot width of 50 feet and minimum area of 5,000 square feet. The maximum allowable RFA for lots in the Hillside Area is determined based on the slope band (City of Los Angeles 2020b). The proposed four single family homes over a combined twelve lots are within the permitted density per the R1-1 Zone.

The Project site is located within Zoning Information (ZI) – 2462, also known as an area subject to modifications to single-family zones and single-family zone hillside area regulations (City of Los Angeles 2020b). Per the requirements of ZI-2462, the Project would be required to comply with grading and hauling regulations in hillside areas, including allowable grading and import/export quantities (City of Los Angeles 2017). Further, if approved, the Project would obtain a ZAD to permit to allow the construction of each residence on a lot fronting on a Substandard Hillside Limited Street improved to less than 20 feet wide and vehicular access by way of the street that is not continuously improved to a minimum 20 feet wide from the driveway apron to the next non-hillside boundary.

Through the plan check process, the City’s Department of Building and Safety (LABS) would thoroughly review all plans for the Project to ensure compliance with all applicable development standards set forth in the LAMC, including the requirements for hillside development, outlined in ZI-2642. Following approval of the building permit, the Project would be deemed consistent with applicable land use plans, policies, and regulations. Therefore, the Project’s residential use is compatible with the City’s Zoning Code, and impacts would be less than significant.

General Plan

The Project site is located within the Brentwood-Pacific Palisades Community Plan Area within the City. The Project site is designated in the General Plan and the Brentwood-Pacific Palisades Community Plan as Low Residential (City of Los Angeles 1998). According to the City’s General Plan Framework, Chapter 3, Land Use, “Single-Family Residential” is identified in the community plans under Minimum, Very Low, Very Low I, Very Low II, and Low. The Project involves the construction of four new single-family residences on an approximately 1.35-acre site. The Project would be designed in compliance with the goals and objectives for Single-Family Residential. Therefore, the

Project would be consistent with the General Plan. Specifically, development of the Project would be in substantial conformance with the following goals of the City's General Plan:

- Housing Element. Goal 1: A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary and affordable to people of all income levels, races, ages, and suitable for their various needs.
- Framework Element. Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.

The General Plan's Housing Element is driven by what is described as "an unprecedented housing crisis" due to the high demand for housing and the lack of affordable options. The Housing Element recognizes that the City must use its regulatory powers to ensure that a diverse assortment of housing choices exists for residents of all income levels (City of Los Angeles 2013). Accordingly, the Project would allow housing in the City within an area zoned for single-family units. Therefore, the Project's residential use is compatible with the goals and objectives of the City's General Plan, and impacts would be less than significant.

Brentwood-Pacific Palisades Community Plan

The Project site is designated by the Brentwood-Pacific Palisades Community Plan Land Use Map as Low Residential (City of Los Angeles 1998). Consequently, the proposed use of the Project site for a single-family residence is consistent with the provisions of the Brentwood-Pacific Palisades Community Plan. Therefore, the Project's residential use is compatible with the Brentwood-Pacific Palisades Community Plan, and impacts would be less than significant.

Land Use Consistency Summary

Based on the above analysis, the Project would not conflict or obstruct the implementation of any applicable land use plans, policies, or regulations. Therefore, impacts related to significant environmental impacts caused by conflicts with applicable plans would be less than significant.

XII. MINERAL RESOURCES

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

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

No Impact. A significant impact may occur if a Project site were located in an area used or available for the extraction of a regionally important mineral resource and a Project would convert an existing or potential future regionally important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally important mineral resource extraction. Mineral Resource Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits, which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction.

The Conservation Element of the City's General Plan did not identify the Project site as a Mineral Resource Zone (City of Los Angeles 2001). According to the Safety Element of the City's General Plan, the Project site is not located within an Oil Field or Drilling Area (City of Los Angeles 1996a). However, various oil field are located in the vicinity of the site, including a state-designated oil field to the east of the Project site, within Pacific Palisades, and one small oil field to the northeast of the Project site. However, none of these oil fields are located within the Project site (City of Los Angeles 2001), and the Project site is not located in an MRZ-2 (DOC 1979). Therefore, impacts associated with loss of availability of a known mineral resource would not occur.

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

No Impact. A significant impact would occur if a Project site were located in an area used or available for extraction of a locally important mineral resource and a Project would convert an existing or potential future locally important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for locally important mineral resource extraction.

The Project site is not identified as a locally important mineral resource site delineated on a local general plan, specific plan, or other land use plan (City of Los Angeles 1996a, 1998, 2001). Therefore, impacts associated with loss of availability of a locally important mineral resource recovery site would not occur.

XIII. NOISE

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

The following section summarizes and incorporates the reference information from the Air Quality and Noise Impact Assessment prepared by Z Consulting Company, dated July 13, 2020 and included as Appendix A of this EIR.

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

Less-Than-Significant Impact. A significant impact may occur if either construction or operation of a Project results in exposure of persons to or generation of noise levels in excess of applicable standards.

Following the general practice used in the City for analysis of construction noise impacts from residential projects, the Noise Ordinance is used as the significance threshold for this assessment. The Noise Ordinance, which is found in the LAMC, presents noise standards applicable to construction and demolition operations occurring within the City. Specifically, LAMC Section 41.40 prohibits construction activities that entail the use of any machine, tool, device or equipment between the hours of 9:00 p.m. and 7:00 a.m. that could disturb sleeping persons in any dwelling, apartment, or other place of residence.

In addition, Section 112.05 of the LAMC prohibits the operation of any power equipment/tool that produces a maximum noise level that exceeds the applicable noise limit from the following list at a distance of 50 feet between the hours of 7:00 a.m. to 10:00 p.m.:

- 75 dB(A) [A-weighted decibels] for construction machinery (e.g., tractors, dozers, drills, loaders, shovels/cranes, etc.);
- 75 dB(A) for powered equipment 20 HP [horsepower] or less intended for infrequent use; and
- 65 dB(A) for powered equipment intended for repetitive use in residential areas (e.g., mowers, blowers, riding tractors, etc.).

Per the LAMC, these noise limitations shall not apply where compliance is technically infeasible. Technically infeasible means that these noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices/techniques during the operation of the equipment.

To quantify the existing ambient noise environment in the Project's vicinity, two measurements were collected on the Project site June 10, 2020 (see Figure 14, Noise Measurement Locations). Table 9 presents the measured ambient noise levels at the Project site. Noise measurement logs are included in Appendix A.

TABLE 9. AMBIENT NOISE LEVELS – dBA

Measurement	Location	Noise Level (Leq dBA)
1	Southwest portion of the Project site	54.7

Source: Appendix A.

Notes: dBA = A-weighted decibel; Leq = equivalent continuous noise level.

Noise impacts associated with the heavy equipment utilized for Project construction are determined using equipment data and equations from the Federal Highway Administration's Roadway Construction Noise Model. The noise calculations can be found in Appendix A.

The following commonly available measures that are used in construction projects in the City are generally considered to be technically feasible:

- All heavy-duty construction equipment shall use sound-reducing mufflers.
- Temporary noise barriers, such as noise walls/curtains or equipment enclosures, shall be used if it is determined that they are necessary to keep sound levels below 75 dB(A).

Construction of the Project would utilize mufflers on heavy construction equipment, whenever possible. These noise control measures are collectively assumed to reduce noise impacts by 10 dBA. This is a conservative estimate of total noise reduction, as evidenced by the following:

- The EPA's Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances (see excerpt in Appendix A) indicates that mufflers result in a noise reduction of 10 dBA.
- The Federal Highway Administration's Noise Barrier Design Handbook (see excerpt in Appendix A) indicates that 10 dBA of reduction is "attainable" from a noise barrier.

Table 10 presents the calculated noise levels for each type of construction equipment and compared then to a significance threshold of 75 dBA.

TABLE 10. CONSTRUCTION NOISE IMPACTS – dBA

Construction Phase	Equipment Types	Noise Level (L_{eq} at 50 feet)	Significance Threshold (L_{eq} at 50 feet)	Exceeds Threshold?
Site Preparation	Tractor/Loader/Backhoe	70	75	No
	Dump Truck	67		No
Grading	Grader	73		No
	Excavator	72		No
	Tractor/Loader/Backhoe	70		No
	Drill Rig	67		No
	Dump Truck	67		No
Building Construction	Generator Set	73		No
	Dump Truck	67		No
	Crane	68		No
	Concrete Truck	70		No
	Concrete Pump Truck	69		No
	Welders	70		No
	Forklift	63		No
	Tractor/Loader/Backhoe	70		No
Paving	Cement and Mortar Mixer	75		No
	Paver	69		No
	Roller	68		No
	Tractor/Loader/Backhoe	70		No
	Concrete Truck	70		No
	Concrete Pump Truck	69		No
	Paving Equipment	69		No
Architectural Coating	Air Compressor	69		No

Source: Appendix A.

Notes: dBA = A-weighted decibel; L_{eq} = equivalent continuous noise level.

As shown on Table 10, the Project would not exceed thresholds set forth in LAMC Section 112.05, which prohibits the operation of any power equipment/tool that produces a maximum noise level that exceeds the applicable noise limit from the following list at a distance of 50 feet between the hours of 7:00 a.m.–10:00 p.m. In addition, similar to other applicable City regulations, the Project is required to comply with the Noise Ordinance and all applicable provisions set forth in the Noise Ordinance. Lastly, in addition to compliance with the City's noise ordinance, the following standard conditions of approval shall also be applied to the Project: Project construction activities shall be restricted to the hours of 7:00 a.m. – 9:00 p.m., Monday through Friday, 8:00 a.m. – 6:00 p.m. Saturdays; Construction activities shall be prohibited on Sundays and all federal holidays. Therefore, short-term construction impacts associated with construction noise levels would be less than significant.

Operational

Once operational, noise generated during operation of the Project would be consistent with the noise generated by the surrounding residential properties. The Project would result in some use

of nearby roadways to access the Project site, which would generate noise; however, the Project would only result in the increase of approximately 38 daily passenger vehicle trips. This nominal increase in trips would not result in substantial traffic noise increase. The Project would generate noise typically associated with single-family residential uses, which would be barely perceivable to nearby residences. Therefore, long-term impacts associated with operational noise levels would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to generate excessive vibration during construction or operation.

Construction

Construction activities can generate various degrees of vibration, depending on the construction procedures and the type of construction equipment used. Operation of construction equipment causes ground vibrations that spread through the ground and diminish with distance. High levels of vibration may cause physical injury or damage to buildings; however, vibrations rarely affect human health. Typically, potential building and structural damages are the foremost concern when considering the impacts of construction-related vibrations.

Although construction activities associated with the Project would result in temporary increases in groundborne vibration in the immediate Project area, vibration levels from conventional construction methods are not anticipated to reach substantial levels. The piles associated with the Project would consist of concrete and steel being placed in a large cylindrical hole. These holes would be drilled using an auger. The steel would be lowered into these holes and filled with concrete. The piles would not be driven. As such, no blasting, pile driving, or other special construction methods associated with excessive groundborne vibration are anticipated during Project construction. As such, it is anticipated that vibration generated during construction of the Project would not cause damage to buildings nor affect sensitive receptors. Therefore, construction impacts associated with vibration would be less than significant.

Operational

As a residential land use, operation of the Project will not involve any activities that are typically associated with groundborne noise or vibrations. Therefore, operational impacts associated with vibration would be less than significant.

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

No Impact. Based upon the criteria established in the City's CEQA Thresholds Guide, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA Community Noise Equivalent Level (CNEL) and the project increases ambient noise levels by 1.5 dBA CNEL or greater (City of Los Angeles 2006).

The Project site is not located in the vicinity of an airport, private airstrip, or airport land use plan or within 2 miles of a public airport or public use airport (Los Angeles County Airport Land Use Commission 2004). The nearest airport to the Project site is the Santa Monica Municipal Airport

(3233 Donald Douglas Loop S), which is located approximately 6 miles southeast of the Project site. As such, the Project would not expose people residing or working in the Project area to excessive noise related to private airstrips or airport land use plans. The project would not expose people residing or working in the project area to excessive noise levels. Therefore, impacts associated with airport and aircraft noise would not occur.

XIV. POPULATION AND HOUSING

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

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

Less-Than-Significant Impact. A potentially significant impact would occur if a Project were to locate new commercial, industrial, or residential development within the City that would induce unplanned population growth, or if a Project would indirectly induce residential development in previously undeveloped areas through the extension of infrastructure.

The Project involves the construction of four new single-family residences. According to SCAG's 2017 local profile for the City, the average household size is 2.9, and the total population is 4,059,665 in 2018 (SCAG 2019). Using the 2.9 average household size, it is anticipated that construction of four single-family homes would introduce approximately 12 people to the City, compared to the existing population of 4,059,665. Thus, the Project would introduce only a negligible number of residents to the Project site, which would not result in substantial unplanned population growth in the Project area.

The Project would introduce residential uses that are consistent with the allowable uses and density as permitted by the LAMC, the Zoning Code, and the General Plan land use designations. In addition, SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2020) projects that the City's population will increase from 4,059,665 to 4,771,300 by Year 2045. The Project's 12 additional residents would be consistent with SCAG's growth projections, and the Project would not induce substantial unplanned population growth. Further, the Project site is within an urban area and is developed with other single-family residences. As such, the Project would not involve extension of roads or other infrastructure that could result in substantial population growth in an undeveloped area. Therefore, impacts associated with population growth would be less than significant.

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

No Impact. A significant impact may occur if a Project would result in displacement of existing occupied housing units or housing, necessitating construction of replacement housing elsewhere.

The Project site is currently undeveloped and does not contain existing residential uses or a residential population. The Project would not displace existing people or housing. Therefore, impacts associated with displacing substantial numbers of people or housing would not occur.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Fire protection?

Less-Than-Significant Impact. A significant impact may occur if the City Fire Department could not adequately serve a Project, necessitating a new or physically altered station.

Fire protection for the Project site is provided by the Los Angeles Fire Department (LAFD). More specifically, the Project site would be served by Fire Station 23, located approximately 0.22 miles northeast of the Project site at 17281 Sunset Boulevard, Los Angeles (LAFD 2020c). From January 2018 to December 2018, operational response times for Fire Station 23 for Emergency Medical Services averaged 7 minutes, 02 seconds and 7 minutes, 27 seconds for Non-Emergency Medical Services (LAFD 2020d).

The Project consists of development of four new single-family residences located within the existing fire protection service boundaries of the LAFD. As discussed in Section XIV, Population and Housing, the Project would introduce approximately 12 residents to the Project site. The Project site is located within 0.22 miles of an existing fire station, which would serve the Project. There are additional fire stations located nearby that could also serve the Project. For these reasons, although the Project could result in an incremental increase for service calls, the increase would be nominal and should not equate to an increase in fire protection demand to the extent that additional facilities are required.

The Project would comply with the required regulations and feasible recommendations of LAFD relative to fire safety and emergency access, and these shall be incorporated into the building plans, including the submittal of a plot plan for approval by LAFD prior to the approval of a building permit. This allows LAFD to ensure that the Project would not increase demand on LAFD to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment. Therefore, impacts associated with LAFD facilities would be less than significant.

b) Police protection?

Less-Than-Significant Impact. A significant impact may occur if a Project were to create the need for new or physically altered police facilities to maintain acceptable service ratios, response times, or other performance objectives, the construction of which could cause significant environmental impacts.

Police protection for the Project site is provided by the Los Angeles Police Department (LAPD). Specifically, the Project site is served by the West LA Community Police Station (City of Los Angeles 2020a), which is located approximately 6.2 miles northeast of the Project site at 1663 Butler Avenue, Los Angeles.

The Project would result in an increase of approximately 12 new residents to the Pacific Palisades neighborhood, representing a nominal increase in population that would only incrementally substantially increase the number of service calls. Thus, the Project would not generate the need for additional police services that would require new or physically altered facilities. In addition, the nearby single-family residential properties are already being served by LAPD, so no service area expansion is necessary. Further, the Project would contribute property taxes to the City's General Fund, which can be used to fund additional resources in accordance with the planning and deployment strategies of LAPD. Therefore, impacts associated with police protection facilities would be less than significant.

c) Schools?

Less-Than-Significant Impact. A significant impact may occur if a Project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District.

The Project would introduce approximately 12 new residents to the Project site, which would not result in substantial population growth in the Project area. The Project would not generate a demand for school services such that the construction of new facilities would be required.

Nonetheless, the Project applicant would be required to pay all applicable developer fees to the Los Angeles Unified School District to offset the Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the LA Department of Building and Safety or their designee shall ensure that the Project applicant has paid all applicable school facility development fees in accordance with California Government Code, Section 65995. Pursuant to California Government Code, Section 65995, payment of development fees authorized by Senate Bill 50 are deemed to be "full and complete school facilities mitigation." Therefore, impacts associated with school facilities would be less than significant.

d) Parks?

Less-Than-Significant Impact. A significant impact to parks may occur if a Project were to include a new or physically altered park or would create the need for a new or physically altered park, the construction of which could cause substantial adverse environmental impacts.

The Project would introduce approximately 12 new residents to the Project site, which would not create a substantial increase of park users. It is anticipated that these new residents would patronize park facilities within the Project area; however, the negligible increase in new residents would not generate a demand such that the construction of new or physically altered parks would be required.

The Project would be subject to a tax of \$200 per dwelling unit pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). This tax, payable to the LA Department of Building and Safety, shall be deposited into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. In accordance with LAMC Section 21.10.3(a)(1), this tax may be offset or reduced based on the amount of on-site open space and recreational amenities provided (City of Los Angeles 2020b). While these residents could slightly increase use of nearby parks, the on-site recreational areas and applicable fees would help to offset the increased demand and provide a fund for future recreational facilities. Therefore, impacts associated with parks and recreational facilities would be less than significant.

e) Other public facilities?

Less-Than-Significant Impact. A significant impact may occur if a Project were to generate a demand for other public facilities (such as libraries) that exceeds the capacity available.

The Los Angeles Public Library provides library services to the City. The library branch nearest to the Project site is the Palisades Branch Library (861 Alma Real Drive), located 1.9 miles northeast of the Project site.

As the Project would result in approximately 12 new residents to the Project site, it would not result in substantial population growth and the Los Angeles Public Library would not experience an exceedance of available capacity. The Project would not directly necessitate the need for a new library. Further, property taxes collected from the Project would be collected and applied toward the City's General Fund, which could be applied toward the provision of new library facilities, as deemed appropriate. It is not anticipated that the Project would result in substantial adverse impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Therefore, impacts associated with library services would be less than significant.

XVI. RECREATION

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

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to include substantial employment or population growth, which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would introduce approximately 12 new residents to the Project site, a negligible number of residents, which would result in similarly nominal increase in the use of nearby parks and recreational areas. Therefore, impacts associated with increased usage of parks and recreational facilities would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to generate a need for the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

The Project involves the construction of four single-family residences and does not include construction of a recreational facility. Although the approximately 12 residents associated with the Project could slightly increase use of nearby parks, this increase in the use of nearby parks and recreational areas would be negligible and not require the construction of new or expansion of existing facilities. Therefore, impacts associated with new or expanded parks and recreational facilities would be less than significant.

XVII. TRANSPORTATION

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

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

Less-Than-Significant Impact. A significant impact may occur if the Project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.

Construction

Pursuant to LAMC Section 13.20.D.4(a), a Haul Route Approval from the BBSC is required because the Project proposes the import and/or export of 1,000 CY or more of earth material. Hauling operations and construction activities would be conducted in accordance with an approved Haul Route. The following standards are applicable to the Project. The Project would comply with these requirements set forth by the City for residential hillside development:

- 10-wheeler dump trucks (with a 10 CY capacity) or smaller are the only type of trucks permitted for hauling of earth. If the project required a Haul Route approval, the BBSC may authorize other types of hauling vehicles
- Hauling is permitted Monday through Friday, between the hours of 9:00 a.m. and 3:00 p.m. Hauling operations on Saturdays, Sundays, or state or federal holidays is strictly prohibited.
- A grouping or convoy of hauling vehicles is not allowed; only one hauling vehicle is permitted per Project site at any one time.

- Construction activity is permitted Monday through Friday, between the hours of 8:00 a.m. to 6:00 p.m. Exterior construction work at any other time is strictly prohibited.

In addition, per City requirements, all projects undergoing new construction or additions of more than 1,000 square feet, located within hillside communities, shall prepare a TMP that identifies measures to offset access, circulation, and parking issues. Once prepared, the TMP shall be submitted to LADOT for review and approval (City of Los Angeles 2020d). The TMP prepared for the Project has been included as Appendix H of this IS/MND. With incorporation of the requirements outlined in the TMP, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities during construction. Therefore, short-term impacts associated with the performance of the circulation system would be less than significant.

Operational

Trip rates for the Project were obtained using the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator, which was designed and intended to be used to develop project-specific daily household VMT per capita and daily work VMT per employee metrics for residential and office land use development projects in the City. The VMT Calculator uses the most recent version of the Institute of Transportation Engineers' (ITE) Trip Generation Manual to calculate VMT. Screening criteria included in the VMT Calculator are included below. If a Project meets any of these two screening criteria, the Project would not be required to perform a VMT analysis (City of Los Angeles 2020e).

- Tier 1 Screening Criteria applies if projects will replace an existing number of residential units with a lesser number of residential units and is within one-half mile of a fixed-rail or fixed-guideway station.
- Tier 2 Screening Criteria: Indicates the net increase in daily trips and the net increase in daily VMT, and whether the Project consists of only retail uses less than or equal to 50,000 square feet.

The Project would not meet Tier 1 or Tier 2 Screening Criteria, outlined above. However, per the VMT Calculator, the Project would result in an increase of 38 daily vehicle trips, or 438 daily VMT (City of Los Angeles 2020e). VMT Calculator outputs are included within Appendix I of this IS/MND. Per the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines, if a project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a development project would be required (Los Angeles Department of Transportation 2020b). Because the Project would result in an increase of approximately 38 daily vehicle trips, much lower than the 250 daily trip threshold outlined by LADOT, the Project is not required to perform a VMT analysis, and it is assumed that the Project would not conflict with an applicable plan, ordinance, or policy established to measure effectiveness of the circulation system. Therefore, long-term impacts associated with the performance of the circulation system would be less than significant.

The Project would include an extension of Revello Drive to the west. However, this improvement would not interfere with existing public transit, bicycle, or pedestrian facilities, or impede the construction of new or the expansion of such existing facilities in the future. The Project would not disrupt public transportation services, alter public transportation routes, or interfere with the operation of public bikeway or pedestrian systems. The Project would not conflict with adopted policies, plans,

or programs regarding public transit, bicycle, or pedestrian facilities. Therefore, impacts associated with alternative transit policies, plans, or programs would be less than significant.

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

Less-Than-Significant Impact. A significant traffic impact occurs when a Project conflicts with or is inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which states that, for land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.

As discussed under Threshold a), above, the Project would result in an increase of 38 daily vehicle trips, or 438 daily VMT (City of Los Angeles 2020e). Per the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines, if a Project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a development project would be required (Los Angeles Department of Transportation 2020b). Because the Project would result in an increase of approximately 38 daily vehicle trips, much lower than the 250 daily trip threshold outlined by LADOT, the Project is not required to perform a VMT analysis, and it is assumed that the Project would not conflict with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, impacts associated with VMT would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to include new roadway design or introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area.

As discussed under Threshold a), above, per City requirements, all projects undergoing new construction or additions of more than 1,000 square feet, located within hillside communities, shall prepare a TMP that identifies measures to offset access, circulation, and parking issues. Once prepared, the TMP shall be submitted to LADOT for review and approval (City of Los Angeles 2020d). The TMP prepared for the Project has been included as Appendix H of this IS/MND. With incorporation of the safety requirements outlined in the TMP, the Project would not increase hazards due to a geometric design feature or incompatible uses.

In addition to the TMP, the Project Applicant would be required to submit final driveway plans and internal circulation plans to the City Department of Public Works Bureau of Engineering for review and approval, ensuring that site driveway access and internal site vehicular movement are designed in accordance with City design requirements. During this review, City staff may require additional measures be implemented on and/or adjacent to the Project should any concerns arise regarding roadway hazards. Such measures may include, but are not limited to, installing signage around the Project site to ensure pedestrian, bicycle, and vehicle safety and preparing a parking and driveway plan that incorporates design features that reduce accidents. Therefore, impacts associated with hazardous design features would be less than significant.

d) Result in inadequate emergency access?

Less-Than-Significant Impact. A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the local fire department, or in any other way threaten the ability of emergency vehicles to access and serve the Project site or adjacent uses.

As previously addressed, prior to obtaining a building or construction permit, the LAFD Development Services Unit conducts Fire Life Safety Plan Check and Fire Life Safety Inspections interpreting and enforcing the applicable standards of the Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling. Additionally, the Development Review Division of the City's Department of Transportation is responsible for reviewing and approving site plans, and roadway and traffic signal plans to ensure Project implementation does not result in inadequate emergency access.

As discussed under Thresholds a) and c), above, the Project Applicant would be required to prepare a TMP, which shall be submitted to LADOT for review and approval, which would include safety requirements for construction within a hillside area (City of Los Angeles 2020d). In addition to the TMP, the Project would be required to submit final driveway plans and internal circulation plans to the City Department of Public Works for review and approval, ensuring that site driveway access and internal site vehicular movement are designed in accordance with City design requirements related to emergency vehicle access. As previously discussed, the Project would be required to submit final driveway and street improvement plans and internal circulation plans to the City Department of Public Works Bureau of Engineering and the Department of Transportation for review and approval, ensuring that site driveway access and internal site vehicular movement are designed in accordance with City design requirements. During this review, City staff may require additional measures be implemented on and/or adjacent to the Project should any concerns arise regarding roadway hazards. Such measures may include, but are not limited to, installing signage around the Project site to ensure pedestrian, bicycle, and vehicle safety and preparing a parking and driveway plan that incorporates design features that reduce accidents.

In addition, if any intermittent on-street parking is necessary during the construction of the Project, construction parking would comply with Sections 80.72, 80.76.2, and 89.60 of Chapter VIII of the Los Angeles Municipal Code, which prohibits or limits parking on streets within the Very High Fire Hazard Severity Zone on Red Flag Alert Days. Further, all demolition and construction materials will be stored on-site within a staging/laydown area and not within the public right-of-way during demolition, hauling, and construction operations. Compliance with this existing regulatory requirement ensures construction activities would not interfere with the City's Red Flag Day Alert Days. Therefore, impacts associated with emergency access would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less-Than-Significant. The Project site is currently undeveloped. Based on a records search conducted by the South Central Coast Information Center (refer to Appendix E), no archaeological sites have been recorded within the Project site. However, it is possible that unknown archaeological resources could exist at the Project site, given that significant archaeological resources have been identified in the Los Angeles area. As such, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. However,

construction activities could continue in other areas of the Project site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. Through compliance with these requirements, potential Project impacts to unknown tribal cultural resources would be less than significant.

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

Less-Than-Significant Impact with Mitigation Incorporated. Pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period. No response was received. A significant impact may occur if a Project were to cause a substantial adverse change in the significance of a Tribal Cultural Resource determined to be significant pursuant to criteria set forth in subdivision(c) of PRC Section 5024.1.

Public Resources Code Section 21080.3.1(b) states:

Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Project ...

As discussed in the Cultural Resources Record Search Report (Appendix E), a total of seven previously recorded cultural resources fall within one-half-mile of the Project site. Of these resources, three previously recorded resources are archaeological resources and consist of prehistoric or Native American resources. However, none of these resources are located within the Project site.

Despite the negative findings of the records search, there is the possibility that intact archaeological deposits and/or tribal cultural resources are uncovered during grading and excavation activities. For this reason, the Project site should be treated as potentially sensitive for archaeological and tribal cultural resources. The Project would implement mitigation measure MM-CUL-1 to reduce potential impacts to unanticipated archaeological and tribal cultural resources to less than significant. With the incorporation of mitigation, impacts associated with tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Less-Than-Significant Impact. A significant impact may occur if a project were to increase water consumption, wastewater, stormwater, electricity, or natural gas generation, or increased telecommunication services to such a degree that the capacity of facilities currently serving the site would be exceeded.

Water Facilities

LADWP provides potable water to the City, and thus to the Project site (LADWP 2015). The LADWP 2015 Urban Water Management Plan (UWMP) provides normal year, single dry year,

and multiple dry year supply-and-demand analysis for LADWP's domestic water service area. As shown in the 2015 UWMP, LADWP's supplies can meet demand for multiple dry years. According to the 2015 UWMP, in the 2013/2014 fiscal year, LADWP supplied 565,259 acre-feet per year (LADWP 2015). The Project involves the construction of four new single-family residences. Based on the City's 2006 CEQA Thresholds Guide's sewage generation factor for a 230 gpd/unit for a three-bedroom single-family development, and 50 additional gpd/unit for one additional bedroom, the Project would generate a demand of approximately 1,180 gallons per day (gpd)/unit or 1.3 acre-feet per year³⁴. This estimated water demand represents a nominal percentage of the total water supplied by LADWP and would not result in an adverse change in the rate of water flows by substantially increasing water demand to the Project site and surrounding area. In addition, the Project would implement water conservation measures such as installation of low-flow bathroom and kitchen faucets, toilets, and showers; and use of water-efficient irrigation systems. Therefore, impacts associated with water facilities would be less than significant.

Wastewater Treatment Facilities

Wastewater generated at the site would be treated at the Hyperion Water Reclamation Plant (HWRP), which is owned and operated by LADWP. The HWRP is the oldest and largest of the City's wastewater treatment plants, with an average dry-weather flow capacity of 450 million gallons per day (mgd), with an average wastewater flow of 253 mgd for 2014–2015 (LADWP 2015).

Based on the City's CEQA Thresholds Guide (City of Los Angeles 2006), the Project would generate a demand of approximately 1,180 gallons per day (gpd)/unit or 1.3 acre-feet per year. Given that HWRP has a remaining capacity to treat 320 mgd of wastewater, the Project would not exceed treatment capacity of the HWRP. In addition, the Project would generate the same types of municipal wastewater that are currently generated throughout the City. The Project would not include industrial uses or activities that would require unique wastewater treatment processes. Further, the LA Green Building Code requires projects to achieve a 20% reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by CEC, and meet 50% construction waste recycling levels. Therefore, impacts associated with wastewater treatment facilities would be less than significant.

Stormwater Drainage Facilities

An existing storm drain inlet is present to the southeast of the Project site, south of the existing paved portion of Revello Drive, and drains into an existing storm drain pipe that extends south towards the PCH. Further, an existing storm drain catch basin is present to the southwest of the Project site on the southern portion of Posetano Road. The Project site slopes downward and in the southerly direction from Tramonto Drive to Revello Drive. At its highest point, the Project site is approximately 290 feet above mean sea level (AMSL) along Tramonto Drive. At its lowest point, the Project site is approximately 165 feet AMSL along its southern boundary below Revello Drive.

As discussed in Section X, Threshold c) iii), the Project would continue to generate surface water runoff. Per the Hydrology and Hydraulics Report (Appendix G), the existing inlet within the southeast of the Project site would either remain, be modified to align with the proposed roadway extension of Revello Drive, or removed and replaced with a City-standard side opening catch

³ The proposed project would result in development of a total of 22 bedrooms. 230 gpd/unit for 3-bedroom single-family development + 50 gpd x 19 bedrooms = 1,180 gpd/unit

⁴ Sewage rates assume that all potable water (water from toilets, sinks, showers, etc.) would be conveyed to the local sewer system.

basin to collect stormwater and convey it to the existing storm drain line which runs south from Revello Drive. All three options would be reviewed by the City during the B-Permit approval process for the proposed roadway extension of Revello Drive. Per the Hydrology and Hydraulics Report (Appendix G), both the existing storm drain inlet and the storm drain catch basin would be adequately sized to convey the peak flow water runoff during a 10- or 50-year storm event. Although the Project would increase the amount of impervious area at the Project site, the Project would comply with the City's LID requirements to reduce surface water runoff. As such, as noted in the Hydrology and Hydraulic Report (Appendix G), the Project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system, or provide substantial additional sources of polluted runoff. Therefore, impacts associated with stormwater drainage facilities would be less than significant.

Electric Power Facilities

As previously discussed in Section 4.VI, Energy, LADWP provides electrical service throughout the City and to the Project site. Upon completion, the Project's operational phase would require electricity for building operation (appliances, lighting, etc.). According to the SCAQMD Air Quality Handbook, residential land uses use 5,626 kilowatt-hours (kWh) per unit (SCAQMD 1993). As such, it is anticipated the Project would result in 22,504 kWh/year or 22.5 megawatts per year, representing approximately 0.34% of LADWP's instantaneous peak demand. Thus, there is adequate generation supply capacity to serve the Project. In addition, the Project would be required to comply with the 2019 Title 24 standards or the most recent standards at the time of building permit issuance. The energy-using fixtures within the Project would likely be newer technologies, using less electrical power. In addition, LADWP is required to procure at least 33% of their energy portfolio from renewable sources by 2020. The current sources for power procured by LADWP include wind, solar, and geothermal sources. These sources account for 32% of LADWP's overall energy mix in 2019, the most recent year for which data are available (CEC 2019). As such, the reliance on electrical power facilities would be reduced. Therefore, impacts associated with electrical power facilities would be less than significant.

Natural Gas Facilities

As previously discussed in Section 4.VI, SoCalGas provides natural gas to the Project site. CPUC regulates California natural gas rates and natural gas services, including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins (CPUC 2019).

Although the Project would require natural gas for building heating, the Project would comply with 2019 Title 24 building energy efficiency standards, reducing energy used in the state. Based on compliance with Title 24 and CPUC regulations, the Project would generate a need for natural gas that is consistent with single-family homes, and due to the newer technology, would require less energy than existing single-family homes in the surrounding area. Therefore, impacts associated with natural gas facilities would be less than significant.

Telecommunications Facilities

The City's local internet, TV, and phone services are provided by AT&T, Charter Communications, DirecTV, Dish Network, Frontier Communications, Charter Spectrum, and Verizon. Since the Project site is in an urbanized area and is surrounded by other single-family residential uses, there are existing telecommunication facilities that would be able to serve the Project site. Once the Project is completed, the residents of the Project would be able to connect to existing

telecommunication services without the need for expansion or construction of new facilities. Therefore, impacts associated with telecommunications facilities would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

LADWP provides potable water to the City and thus to the Project site (LADWP 2015). The LADWP 2015 UWMP provides normal year, single dry year, and multiple dry year supply-and-demand analysis for LADWP's domestic water service area. As shown in the 2015 UWMP, LADWP's supplies can meet demand for multiple dry years (LADWP 2015). The Project involves the construction of four new single-family residences, which could result in an additional 1,180gpd of water demand (see threshold a, above). However, this slight increase would not result in an adverse change in the rate of water flows by substantially increasing water demand to the Project site and surrounding area. The Project is not expected to have a substantial increase in water demand. Therefore, impacts associated with water supplies would be less than significant.

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

Less-Than-Significant Impact. A significant impact would occur if the wastewater treatment provider indicates that a Project would increase wastewater generation to such a degree that the capacity of the facilities currently serving the Project site would be exceeded.

Wastewater generated at the Project site would be treated at the HWRP, which is owned and operated by LADWP. The HWRP is the oldest and largest of the City's wastewater treatment plants, with an average dry-weather flow capacity of 450 mgd, with an average wastewater flow of 263 mgd for 2014–2015 (LADWP 2015). Wastewater generated by the Project would represent only a nominal percentage of the HWRP average dry-weather flow capacity and average wastewater flow. Therefore, impacts associated with wastewater treatment capacity would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to increase solid waste generation to such a degree that existing and projected landfill capacities would be insufficient to accommodate the additional solid waste.

Solid waste generated by single-family residential uses in the City is collected by LA Sanitation. Solid waste transported from the Project site would be recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Solid waste generated within the City is disposed of at landfill facilities located throughout the County. While LA Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a

waste-to-energy facility, or disposed of at a landfill. The Chiquita Canyon Landfill and the Sunshine Canyon Landfill serve existing land uses within the City. Both landfills are Class III and accept residential, commercial, and construction nonhazardous waste. When waste is received at Class III landfills and transformation facilities, some is recycled for on-site use, such as alternative daily cover, and some is sent off site for recycling or processing. The remaining waste is landfilled or transformed into energy. As of August 2018, the Chiquita Canyon Landfill reported a remaining permitted capacity of 60,408,000 cy, with an estimated closure date of January 2047 and a maximum permitted capacity of 12,000 tons per day (CalRecycle 2019a). As of May 2018, the Sunshine Canyon Landfill reported a remaining capacity of 77,900,000 cy, with an estimated closure date of December 31, 2037 and a maximum permitted capacity of 12,100 tons per day (CalRecycle 2019b).

The Project involves the construction of four new single-family residences. Project construction would involve some generation of waste during demolition; however, pursuant to the City's Construction and Demolition Waste Recycling Ordinance, the Project would have to reuse/recycle all of its "C" and "D" construction/demolition waste (e.g., concrete and asphalt, bricks, gypsum/wallboard, scrap metal) (City of Los Angeles 2020g). The remaining demolition/construction waste requiring disposal at a landfill facility would represent a nominal percentage of the permitted maximum daily disposal tonnage at the Chiquita Canyon Landfill and the Sunshine Canyon Landfill facilities.

Once operational, the Project would result in waste typically associated with single-family residences. According to the California Department of Resources Recycling and Recovery, single-family residences generate approximately 10 pounds per dwelling unit per day (CalRecycle 2019c). Thus, it is anticipated the Project would generate approximately 40 pounds of solid waste per day, or 7.3 tons per year. This number is nominal compared to the 12,000 daily permitted disposal tonnage at Chiquita Canyon Landfill and the 12,100 tons per day daily permitted tonnage of Sunshine Canyon Landfill. In addition, this amount does not factor in any recycling or waste diversion programs. Solid waste generated by the Project would not generate waste in excess of state or local standards. Therefore, impacts associated with landfill capacity would be less than significant.

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

Less-Than-Significant Impact. A significant impact may occur if a Project were to generate solid waste that is not disposed of in accordance with applicable regulations.

The City committed to reaching zero waste by diverting 90% of the solid waste generated in the City by 2025 (City of Los Angeles 2014). State law currently requires at least 50% solid waste diversion and establishes a statewide goal of 75% diversion by 2020. LA Sanitation collects more than 1 million tons of refuse annually from 750,000 customers, including single-family and small multifamily residences (City of Los Angeles 2020h). Since the Project involves the construction of four new single-family residences, the amount of waste generated would not result in a substantial increase in waste generated from the Project area. The Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Further, the City implemented the Construction and Demolition Waste Recycling Ordinance, to meet the waste diversion goals of AB 939 and Senate Bill 1374, pertaining to demolition and construction waste (City of Los Angeles 2020b). Required compliance with these regulations would reduce the Project's solid waste generation during construction. Therefore, impacts associated with solid waste regulations would be less than significant.

XX. WILDFIRE

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

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

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

Less-Than-Significant Impact. According to CAL FIRE's Fire Hazard Severity Zone Viewer, the Project site and surrounding area is within a VHFHSZ (CAL FIRE 2020). However, as discussed in Section 4.IX, Hazards and Hazardous Materials, as part of standard development procedures, plans would be submitted for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with City regulations. In addition, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel on public rights-of-way. Therefore, impacts would be less than significant.

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

Less-Than-Significant Impact. The Project site is located on a vacant site in an urbanized developed neighborhood. The Project site is directly surrounded by vacant land and similar single-family residential uses. Although the Project site is within a hillside area, the Project would not exacerbate wildfire risks due to slope or prevailing winds, as there are existing single-family residences adjacent to the Project site. In the event of a wildfire, the pollutant concentration resulting from the wildfire would be similar before and after Project construction. A vegetation fire

on the Project site would have a relatively short burn time, since the Project site is not located within a wildland area and is surrounded by development. As such, the Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors. Therefore, impacts would be less than significant.

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

Less-Than-Significant Impact. The Project involves the construction of four new single-family residences within an existing area zoned for single-family uses. The Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk. In addition, utility connections associated with the Project would occur within a surrounding developed area, which would not exacerbate fire risk. Therefore, impacts would be less than significant.

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

Less-Than-Significant Impact. As previously discussed, in Section VII, Threshold a) IV, the Project site is located within a landslide zone (CGS 2020). However, the ground improvements and remedial grading work performed on the Project site as proposed and approved in the Tramonto and Revello Geology and Soils Reports will grossly stabilize and remediate/eliminate any slope failures from occurring on the Project site. As a result, the Project would not expose people or structures to significant risk site, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less-Than-Significant Impact with Mitigation Incorporated. As previously discussed in Section 4.IV, Biological Resources, and Section 4.V, Cultural Resources, with implementation of mitigation measures MM-BIO-1 and MM-CUL-1, the Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a**

project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less-Than-Significant Impact with Mitigation Incorporated. As addressed throughout, the Project would have no impact or less than significant impacts with respect to all environmental impact areas. Cumulative impacts related to air quality and GHG emissions have already been addressed in their respective sections. Cumulative impacts for the other resource areas are discussed as follows.

Aesthetics

Development of the Project in conjunction with related projects would result in an intensification of development in the Pacific Palisades neighborhood. Development of the related projects is expected to occur in accordance with adopted plans and regulations. Related projects would be similar in use to the Project and would not be prominent features within the field of view from the Project site. With respect to the overall visual quality of the surrounding neighborhood, related projects would be subject to site plan review by the Department of City Planning. Each related project would be subject to the City's design guidelines and the Brentwood-Pacific Palisades Community Plan, ensuring consistency and compatibility with the surrounding area. Through regulatory code compliance and applicable site plan review, each related project would be constructed as approved and in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. The analysis of the Project's impacts to aesthetics concluded that the Project would not have a significant impact. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to aesthetics would be less than significant.

Agriculture

Implementation of the Project, in combination with the related projects in the Project vicinity, would result in the continued development of the surrounding area. Impacts to agricultural resources tend to be site specific and are assessed on a site-by-site basis. The analysis of the Project's impacts to agricultural resources concluded that the Project would not have a significant impact. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to agriculture would be less than significant.

Biological Resources

The geographic scope of the cumulative biological resources impact analysis takes into consideration related projects within the Pacific Palisades neighborhood. Although impacts of the Project are primarily localized to the impact areas, loss of vegetation types or fragmentation of wildlife corridors would combine with similar impacts of other projects and may extend beyond these limited impact areas. Due to the distance, intervening development, and because the Project site is located within an urbanized area, the Project would not interfere with the movement of any native residents, migratory fish, or wildlife species. However, nesting birds could be affected by direct impacts due to tree removal and indirect impacts from short-term construction-related noise, resulting in decreased reproductive success or abandonment of an area as nesting habitat. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to nesting birds would be less than significant.

The Project alone would not result in significant impacts to special-status biological resources. A significant impact to biological resources is typically based on consideration of the Project's

impact on known sensitive species and/or the loss of valued habitat. Due to the fact that the Project would not affect any rare, threatened, or endangered species, the majority of resultant cumulative impacts would also be considered less than significant.

Approximately 0.62-acre of disturbed lemonade berry scrub would be permanently impacted directly. Direct permanent impacts to special-status vegetation communities could be considered significant absent mitigation. MM-BIO-1 will be required to adequately reduce potential impacts to sensitive natural communities to less than significant. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to lemonade berry scrub habitat would be less than significant.

Cultural Resources

Development of the Project in conjunction with related projects would result in the continued development of the surrounding area. Impacts to cultural resources tend to be site specific and are assessed on a site-by-site basis. The analysis of the Project's impacts on cultural resources concluded that the Project would have a less than significant impact with mitigation incorporated. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable with implementation of mitigation measure MM-CUL-1, and cumulative impacts to cultural resources would be less than significant.

Energy

The Project and related projects would cumulatively increase the demand for electricity, natural gas, and petroleum. The Project's development would comply with existing regulations requiring energy conservation features to reduce the Project's contribution. As with the Project, other future development projects would be expected to incorporate CALGreen and state energy standards under Title 24, and incorporate regulations governing energy conservation. Since the Project involves the construction of four new single-family residence units, any increase in energy demand would be nominal. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to energy would be less than significant.

Geology and Soils

Geotechnical hazards are site specific and are assessed on a site-by-site basis. There is little, if any, cumulative geological relationship between the Project and related projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis, and if necessary, the applicants of the related projects would be required to adhere to appropriate regulatory compliance measures. The Project site has been determined to be suitable for the development of the Project based on the City-approved geologic recommendations contained in the Tramonto and Revello Geology and Soils Reports (Appendix E). While there is always a possibility that subsurface construction activity could unearth a potentially significant paleontological resource, the project would implement mitigation measure MM-GEO-1, which would ensure that subsurface construction activity complies with the standard procedures for treatment of unanticipated discoveries of paleontological resources, ensuring impacts would be less than significant. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts on geology and soils would be less than significant.

Hazards and Hazardous Materials

Development of the Project in combination with the related projects has the potential to increase to some degree the risks associated with the use and accidental release of hazardous materials. However, the Project site is not known to contain hazardous materials, and the Project would not pose a significant hazard to the public or the environment through the use or transport of hazardous materials or substances. In addition, Project impacts associated with emergency evacuation would be less than significant and thus would not be cumulatively considerable. With respect to the related projects, the presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. In addition, local municipalities are required to follow federal, state, and local laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts on hazards and hazardous materials would be less than significant.

Hydrology and Water Quality

Implementation of the Project, in combination with the related projects in the Project vicinity, would result in the continued development of the surrounding area. The Project site and the surrounding areas are served by the existing City storm drain system. Under the existing conditions, stormwater runoff from the Project site and adjacent urban uses is typically directed into existing City storm drain system, including the existing storm drain inlet is present to the southeast of the Project site, south of the existing paved portion of Revello Drive, and extends south towards the PCH, and an existing storm drain catch basin is present to the southwest of the Project site, on the south side of Posetano Road. It is likely that most, if not all, of the related projects would also drain to the surrounding street system.

Pursuant to the City's LID requirements, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 0.75 inches of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater (City of Los Angeles 2016c). In addition, required BMPs would reduce erosion and siltation from construction activities, decrease potential surface water or groundwater contamination, and decrease the potential for flooding. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts on hydrology and water quality would be less than significant.

Land Use and Planning

The geographic scope of this analysis is in the Brentwood—Pacific Palisades Community Plan Area. With respect to community division, the Project would have no impact. As discussed in Section XI, the Project would be consistent with the City's General Plan, the zoning code, and the Brentwood-Pacific Palisades Community Plan. Thus, development of any related project is expected to occur in accordance with the City's adopted land use plans, policies, and regulations. It is also expected that the related projects would be compatible with the zoning and land use designations of each related Project site and its existing surrounding uses. In addition, it is reasonable to assume that the related projects would implement and support local and regional planning goals and policies. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts on land use and planning would be less than significant.

Mineral Resources

Implementation of the Project, in combination with the related projects in the Project vicinity, would result in the continued development of the surrounding area. Impacts on mineral resources tend to be site specific and are assessed on a site-by-site basis. The Project site does not contain any known mineral resources. The analysis of the Project's impacts on mineral resources concluded that the Project would not have significant impacts. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts on mineral resources would be less than significant.

Noise

Noise is measured and experienced on a logarithmic scale. This causes some unexpected properties, such as the following rule of thumb: if two simultaneous noises have volumes at least 10 dBA apart, the louder noise will entirely drown out the lower volume noise. Stated another way, if you add a 50-dBA noise to a 60-dBA noise, the resulting noise level remains 60 dBA.

Any substantial material (buildings, terrain, walls, etc.) that breaks line-of-sight between a noise source and the receptor will reduce the noise level experienced by that receptor by at least 10 dBA. Because a large amount of shielding exists in the area due to the extreme elevation variations and the limited line of sight to nearby projects, the Project is not expected to cause or contribute to any significant cumulative noise impact. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts on noise would be less than significant.

Public Services and Recreation

Fire Protection

The geographic scope of the cumulative impacts study area is the related projects within the service area of LAFD Fire Station 23, located at 17282 Sunset Boulevard, Los Angeles. Development of the Project in combination with the related projects would increase the cumulative demand for fire services. LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs and station expansions or new station construction that may become necessary to adequately serve its service area. Through the City's regular budgeting process, LAFD's facility needs would be identified according to the priorities at the time, changes in service population, and demand factors. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes), to which the Project and related projects would contribute.

If there were a fire protection impact due to the combined impacts of the related projects, the Project would not make a cumulatively considerable contribution to the impact for the reasons previously described. The Project and each of the related projects also would be individually subject to LAFD review and would be required to comply with all applicable LAFD, LA Department of Building and Safety, and other City fire safety requirements, including hydrant and access improvements, if necessary, to adequately offset fire protection impacts. Therefore, the Project's contribution to cumulative impacts on fire protection would be less than significant.

Police Protection

The geographic scope of the cumulative impacts study area is the related projects within the service area of the West Police Station, located at 1663 Butler Avenue, Los Angeles. The Project and the related projects would increase the demand for police services. This cumulative increase in demand for police services would increase demand for additional LAPD staffing, equipment, and facilities over time. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and potential station expansions or new station construction that may become necessary to adequately serve its service area.

Through the City's regular budgeting process, LAPD's resource needs would be identified and funds allocated according to the priorities at the time. Any new or expanded police stations would be funded via existing mechanisms (e.g., property and sales taxes), to which the Project and related projects would contribute. Furthermore, the Project and related projects would be required to consult with LAPD during the plan check phase to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. It is anticipated that related projects would implement design features similar to the Project and other necessary measures, which would reduce cumulative impacts to police protection services.

The Project and each of the related projects also would be individually subject to compliance with all applicable state, LAPD, LA Department of Building and Safety, and other City requirements regarding emergency access. As is the case under the existing conditions, emergency vehicles would access the Project site and each of the related projects directly from surrounding roadways. As such, emergency access to the Project vicinity would be maintained at all times, and cumulative traffic would not significantly impact emergency vehicle response. Therefore, the cumulative police protection impacts would be less than significant.

Schools

The geographic scope of cumulative impacts to the Los Angeles Unified School District includes the related projects within the service area of the Los Angeles Unified School District schools serving the Project site. The Project and related projects would be required to pay all applicable developer fees to the Los Angeles Unified School District to offset the demands on local schools. Prior to issuance of a building permit, the general manager of the LA Department of Building and Safety or their designee shall ensure that the Project applicant has paid all applicable school facility development fees in accordance with California Government Code, Section 65995. Pursuant to California Government Code, Section 65995, payment of development fees authorized by Senate Bill 50 are deemed to be "full and complete school facilities mitigation." Therefore, cumulative impacts associated with school facilities would be less than significant.

Parks and Recreation

The Project, in combination with related projects, could increase the demand for parks and recreational facilities in the Project area. However, as previously discussed in Section 4.XIV, Parks and Recreation, the proposed residential structures would introduce a negligible number of residents to the Project site, which would not result in substantial population growth in the Project area. Thus, the Project would not generate a substantial need for additional parks and recreational facilities, which in turn would require the construction of new or the expansion of existing recreational facilities.

Per LAMC Section 21.10.3(a)(1), the Project and residential-related projects would generate a Dwelling Unit Tax that could be applied toward the provision of new parks and recreation facilities serving the Project area, as deemed appropriate. These revenues would help offset any increase in the demand for parks and recreation services as a result of implementing the Project and other related projects. Therefore, cumulative impacts related to parks and recreation services would be less than significant.

Other Public Facilities

The geographic scope of the cumulative impacts is the service area of Los Angeles Public Library, especially the Palisades Branch Library (861 Alma Real Drive), located 1.9 miles northeast of the Project site. However, the City Charter requires libraries to be funded from property taxes, including those assessed against the Project and related projects. The Project and the related projects would be required to pay these fees as applicable. The population increase resulting from the related projects would not be sufficient to result in a substantial increase in demand for library services such that new or physically expanded libraries would be needed. Therefore, cumulative impacts associated with library services would be less than significant.

Transportation

Similar to the currently proposed Project, the other nearby projects would have to adhere to all applicable requirements set forth by the City to minimize, to the extent feasible, impacts to existing adjacent residential users during construction of residential projects in hillside areas. Construction of the Project would result in a nominal temporary increase of haul truck trips on local roads of about 125 haul trips during the full three-year construction period (Appendix A). In addition, approximately 80 workers would access the Project site throughout a typical 8-hour construction workday during peak construction phasing. Worker and vendor trips would be scattered throughout the construction workday, and construction parking will occur on the Project site. The Project's construction traffic would be intermittent and short-term, ceasing upon completion of construction activities.

Further, during the operational phase, the Project would generate 38 daily trips. Per the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines, if a project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a development project would be required (Los Angeles Department of Transportation 2020b). Because the Project would result in an increase of approximately 38 daily vehicle trips, much lower than the 250 daily trip threshold outlined by LADOT, the Project is not required to perform a VMT analysis, and it is assumed that the Project would not conflict with an applicable plan, ordinance, or policy established to measure effectiveness of the circulation system or CEQA Guidelines Section 15064.3, subdivision (b). Based on these considerations, the currently proposed Project's construction- and operational-related traffic, coupled with the short-term construction and long-term operational vehicle trips generated by the other projects, would still not result in adverse effects on the local street system. Therefore, cumulative impacts would be less than significant.

Tribal Cultural Resources

Development of the Project in conjunction with related projects would result in the continued development of the surrounding area. Impacts to tribal cultural resources tend to be site specific and are assessed on a site-by-site basis. The analysis of the Project's impacts on tribal cultural

resources concluded that the Project would have a less than significant impact with mitigation incorporated. Further, related projects would be required to comply with existing regulations in the unlikely event that archaeological and/or tribal cultural resources (i.e., sites, features, or artifacts) are exposed during construction activities. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to Tribal cultural resources would be less than significant.

Utilities and Service Systems

Water

Development of the Project, development of related projects, and the cumulative growth throughout the City would further increase the demand for potable water in the surrounding area. Through the 2015 UWMP, LADWP has demonstrated that it can provide adequate water supplies for the City for multiple dry years, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District of Southern California (Metropolitan). Metropolitan uses a land-use based planning tool that allocates projected demographic data from SCAG into water service areas for each of Metropolitan's member agencies. As previously discussed in Section 4.XIV, the Project would not cause a substantial increase in population growth in the Project area. Any direct population growth generated by the Project would be small and would not exceed SCAG's growth projections. Thus, the Project-related growth would be consistent with SCAG's growth projections for the Los Angeles subregion. As such, the additional water demands generated by the Project are accounted for in the 2015 UWMP. Therefore, the Project's cumulative impact on water utilities would be less than significant.

Wastewater

Development of the Project in conjunction with the related projects would further increase regional demands on the HWRP's capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City and the surrounding area. However, the HWRP has a remaining capacity to treat 320 mgd of wastewater. Future related projects would be required to ensure that existing wastewater treatment facilities can handle their wastewater treatment requirements. Therefore, the cumulative impact on wastewater treatment facilities would be less than significant.

With respect to sewer lines, the need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site specific. Similar to the Project, the City would require detailed gauging and evaluation of the related projects' wastewater connection point at the time of connection to the system to ensure that the infrastructure has sufficient capacity to convey wastewater flows. Therefore, the Project's cumulative impacts on wastewater utilities would be less than significant.

Stormwater

Implementation of the Project, in combination with the related projects in the Project vicinity, would result in the continued development of the surrounding area. The Project site and the surrounding areas are served by the existing City storm drain system. Under the existing conditions, stormwater runoff from the Project site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system.

Pursuant to the City's LID requirements, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 0.75 inches of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater (City of Los Angeles 2016c). In addition, required BMPs would reduce erosion and siltation from construction activities, decrease potential surface water or groundwater contamination, and decrease the potential for flooding. All related projects would be required to comply with the same existing regulations and standard as the Project. Therefore, the Project's cumulative impacts on stormwater utilities would be less than significant.

Solid Waste

Implementation of the Project in conjunction with the related projects would further increase demand on area landfills. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City. The Project would contribute approximately 40 pounds of solid waste a day, or 7.3 tons per year (CalRecycle 2019c). As with the Project, the related projects would be required to participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. Therefore, the Project's cumulative impacts on solid waste would be less than significant.

Wildfire

The Project site is located within a VHFHSZ. Therefore, there is a potential for wildlands fires to occur. However, the Project and related projects would comply with site plan review and permitted requirements of the LA Department of Building and Safety. The Project and related projects require approval from the LAFD prior to issuance of building permits to ensure conformance with all applicable fire code regulations. In addition, the Project and cumulative projects would not result in an increased population within an undeveloped area. Therefore, the Project's cumulative impacts on wildfire would be less than significant.

Cumulative Impact Summary

For all resource areas analyzed, with compliance with existing local, state, and federal regulatory requirements that would apply to construction and operation of the Project, as well as with the incorporation of standard conditions of approvals, project design features, and mitigation measures, the Project's individual-level impacts would be reduced to less than significant levels, which would, in turn, reduce the potential for these impacts to be considered part of any possible cumulative impact. In addition, these other related projects would presumably be bound by their applicable lead agency to (1) comply with the all applicable federal, state, and local regulatory requirements; and (2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less than significant levels. Therefore, the Project would not result in individually limited but cumulatively considerable impacts.

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

Less-Than-Significant Impact with Mitigation Incorporated. As evaluated throughout this document, environmental impacts associated with the Project would be less than significant with mitigation incorporated, less than significant or would result in no impact. Thus, the Project would not directly or indirectly cause substantial adverse effects on human beings.

INTENTIONALLY LEFT BLANK

5 Preparers and Persons Consulted

Dudek

38 North Marengo Avenue
Pasadena, California 91101

Nicole Cobleigh, Senior Project Manager

Collin Ramsey, Senior Project Manager

Iulia Roman, Environmental Planner

Michael Cady, Senior Project Biologist

Tracy Park, Project Biologist

Garrett Zuleger, Air and Noise Analyst

Andrew Greis, GIS Specialist

Chelsea Ringenback, Publications Specialist

INTENTIONALLY LEFT BLANK

6 References, Acronyms and Abbreviations

6.1 REFERENCES CITED

- CAL FIRE (California Department of Forestry and Fire Protection). 2020. Fire Hazard Severity Zone Viewer. June 24, 2020. <https://egis.fire.ca.gov/FHSZ/>
- California Department of Water Resources. 2020. Basin Prioritization. Accessed July 16, 2020. <https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization>
- CalRecycle (California Department of Resources Recycling and Recovery). 2018a. "SWIS Facility Detail Chiquita Canyon Sanitary Landfill (19-AA-0052)." Accessed June 23, 2020. <https://www2.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0052/Detail/>
- CalRecycle. 2019b. "SWIS Facility Detail Sunshine Canyon City/County Landfill (19-AA-2000)." Accessed June 23, 2020. <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-2000>.
- CalRecycle. 2019c. "Estimated Solid Waste Generation Rates." Accessed June 23, 2020. <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Residential>.
- CalEPA (California Environmental Protection Agency). 2020. Cortese List Data Resources. Accessed June 23, 2020. <https://calepa.ca.gov/SiteCleanup/CorteseList/>
- Caltrans (California Department of Transportation). 2011. List of eligible and designated State Scenic Highways. Last Updated August 2011. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.
- CARB (California Air Resources Board). 2014. *First Update to the Climate Change Scoping Plan: Building on the Framework*. May 2014. Accessed July 13, 2020. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.
- CARB. 2017. California's 2017 Climate Change Scoping Plan. November 2017. Accessed July 13, 2020. https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf
- CNPS (California Native Plant Society). 2021b. A Manual of California Vegetation, Online Edition. Accessed April 2021. <https://www.cnps.org/vegetation>.
- CPUC (California Public Utilities Commission). 2019. "Natural Gas and California." Accessed January 16, 2019. http://www.cpuc.ca.gov/natural_gas/.
- CDFW (California Department of Fish and Wildlife). 2019. California Regional Conservation Plans [map]. April 2019. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>.

CEC (California Energy Commission). 2016. *2015 Integrated Energy Policy Report*. Docketed June 29, 2016.

CEC. 2018. "2018 Power Content Label: Los Angeles Department of Water and Power." Accessed July 14, 2020. https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_LADWP.pdf.

CGS (California Geological Survey). 2020. "EQ Zapp: California Earthquake Hazards Zone Application." Accessed July 16, 2020. <https://www.conservation.ca.gov/cgs/geohazards/eq-zapp>.

City of Los Angeles. 1995. *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report*. January 19, 1995. <https://planning.lacity.org/housinginitiatives/housingelement/framework/FrameWorkFEIR.pdf>.

City of Los Angeles. 1996a. "Safety Element." In *City of Los Angeles General Plan*. November 1996.

City of Los Angeles. 1996b.

City of Los Angeles. 1998. Brentwood-Pacific Palisades Community Plan Update. Adopted June 17, 1996. Accessed June 30, 2020. <https://planning.lacity.org/odocument/abf34149-0480-4d2d-9506-26b8e06fe185/BrentwoodPacific%20Palisades%20Community%20Plan.pdf>

City of Los Angeles. 2001. "Conservation Element." In *City of Los Angeles General Plan*. Adopted September 26, 2001.

City of Los Angeles. 2005. Ordinance No. 176943. https://clkrep.lacity.org/online/docs/2005/05-1454_ord_176943.pdf

City of Los Angeles. 2006. *City of Los Angeles CEQA Thresholds Guide*.

City of Los Angeles. 2007. *Green LA – An Action Plan to Lead the Nation in Fighting Global Warming*. May 2007. https://handels.gu.se/digitalAssets/1344/1344086_la_climatechange_final_1.pdf

City of Los Angeles. 2011a. Ordinance No. 181624. https://planning.lacity.org/Code_Studies/HillsideAreaDefinitionAmendment/AdoptedBaselineHillsideOrdinance.pdf

City of Los Angeles. 2011b. Ordinance No. 181899. https://clkrep.lacity.org/online/docs/2009/09-1554_ord_181899.pdf

City of Los Angeles. 2013. City of Los Angeles General Plan Housing Element. <https://planning.lacity.org/plans-policies/housing-element>

- City of Los Angeles. 2014. *Final Program Environmental Impact Report, Solid Waste Integrated Resources Plan*. December 2014. <https://www.lacitysan.org/san/sandocview?docname=cnt012520>.
- City of Los Angeles. 2015. Ordinance No. 183833. https://clkrep.lacity.org/online/docs/2014/14-0994_ord_183833_10-03-2015.pdf
- City of Los Angeles. 2016a. *Mobility Plan 2035*. Adopted September 7, 2016. https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf.
- City of Los Angeles. 2016b. Los Angeles Municipal Code Chapter 9, Article 7, Section 93.0117, Outdoor Lighting Affecting Residential Property. Effective December 30, 2016.
- City of Los Angeles. 2016c. *Planning and Land Development Handbook for Low Impact Development (LID)*. May 9, 2016. http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf.
- City of Los Angeles. 2017a. "City of Los Angeles, Zoning Information (ZI) File No. 2467, Hillside Construction Regulation District." March 17, 2017. <http://zimas.lacity.org/documents/zoneinfo/ZI2467.pdf>.
- City of Los Angeles. 2018. Emergency Operations Plan. November 2018. Accessed June 26, 2020. <https://emergency.lacity.org/sites/g/files/wph496/f/Comprehensive%20Emergency%20Operations%20Plan%20%28EOP%29-%202018.pdf>
- City of Los Angeles. 2019. L.A.'s Green New Deal – Sustainable City pLAn. Accessed July 13, 2020. https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf
- City of Los Angeles. 2020a. ZIMAS [web map application]. Accessed June 6, 2020. <http://zimas.lacity.org/>.
- City of Los Angeles. 2020b. Brentwood-Pacific Palisades Community Plan. Accessed June 10, 2020. <https://planning.lacity.org/plans-policies/community-plan-area/brentwood-pacific-palisades>
- City of Los Angeles. 2020c. Los Angeles Municipal Code Chapter I Planning and Zoning Code. Current through March 31, 2020.
- City of Los Angeles. 2020c. "Construction and Demolition Recycling." Accessed June 23, 2020. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afLoop=8109987212861601&_afWindowMode=0&_afWindowId=awd9tg8ah&_adf.ctrl-state=knkki0va_667#!%40%40%3F_afWindowId%3Dawd9tg8ah%26_afLoop%3D8109987212861601%26_afWindowMode%3D0%26_adf.ctrl-state%3Dknkki0va_67110

City of Los Angeles. 2020d. LADOT Transportation Assessment Guidelines Addendum – Hillside Developments. June 16, 2020.

City of Los Angeles. 2020e. VMT Calculator. Accessed July 16, 2002. <https://ladot.lacity.org/businesses/development-review>.

City of Los Angeles. 2020f. City of Los Angeles VMT Calculator User Guide, February 2019. https://planning.lacity.org/odocument/463725b1-2f43-4926-86e7-26f02058d730/VMT_Calculator_User_Guide.20190228.pdf

City of Los Angeles. 2020g. Construction and Demolition Recycling. Accessed June 23, 2020. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_adf.ctrl-state=5enh9ao82_78&_afLoop=1384127926427571&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D1384127926427571%26_afWindowMode%3D0%26_adf.ctrl-state%3D5enh9ao82_82

City of Los Angeles. 2020h. Solid Resources. Accessed June 24, 2020. https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s?_adf.ctrl-state=5enh9ao82_155&_afLoop=1384427244079493&_afWindowMode=0&_afWindowId=9xy6wv2dv#!%40%40%3F_afWindowId%3D9xy6wv2dv%26_afLoop%3D1384427244079493%26_afWindowMode%3D0%26_adf.ctrl-state%3D5enh9ao82_159

CPUC (California Public Utilities Commission). 2019. “Natural Gas and California.” Accessed January 16, 2019. http://www.cpuc.ca.gov/natural_gas/.

DOC (Department of Conservation). 1979. “Topanga Quadrangle Special Report 143 Plate 2.19 Mineral Land Classification Map.” DOC, Division of Mines and Geology. May 25, 1979.

DOC. 2017. State of California Williamson Act Contract Land. Accessed June 11, 2020. [https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/\(E\)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf](https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf)

DOC. 2020. California Important Farmland Finder. Accessed June 11, 2020. <https://maps.conservation.ca.gov/DLRP/CIFF/>

DTSC (Department of Toxic Substances Control). 2020. “EnviroStor.” Accessed June 25, 2020. https://www.envirostor.dtsc.ca.gov/public/map/?global_id=38330005.

FEMA (Federal Emergency Management Agency). 2008. “FEMA Flood Insurance Rate Map 06037C1610F.” September 26, 2008. <https://msc.fema.gov/portal>.

EPA (U.S. Environmental Protection Agency). 2018. “Household Hazardous Waste (HHW).” Accessed September 20, 2018. <https://www.epa.gov/hw/household-hazardous-waste-hhw>.

- Los Angeles County Airport Land Use Commission. 2004. Los Angeles County Airport Land Use Plan. Accessed July 13, 2020. http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf
- Los Angeles Department of Transportation (LADOT), 2020a. "Development Review." Accessed June 25, 2020. <https://ladot.lacity.org/businesses/development-review>.
- LADOT. 2020b. Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines. July 2020. Accessed July 16, 2020. https://ladot.lacity.org/sites/default/files/2020-07/ta_guidelines_all-sections_2020.07.04_attachments.pdf
- LADWP (Los Angeles Department of Water and Power). 2015. *Urban Water Management Plan*. Accessed June 26, 2020. https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwp?_afWindowId=62rmetsgn_26&_afLoop=408498178657541&_afWindowMode=0&_adf.ctrl-state=62rmetsgn_29.
- LAFD. 2020a. "Hazardous Materials." Accessed June 25, 2020. <https://www.lafd.org/fire-prevention/cupa/hazardous-materials>.
- LAFD. 2020b. "Overview." Accessed June 26, 2020. <https://www.lafd.org/fire-prevention/fire-development-services>
- LAFD. 2020c. "Find Your Station." Accessed June 11, 2020. <https://www.lafd.org/fire-stations/station-results>.
- LAFD. 2020d. "FIRESTATLA." Accessed June 11, 2020. <https://www.lafd.org/fsla/stations-map?st=421&address=17548%20Revello%20Dr%2C%20Pacific%20Palisades%2C%20CA%2090272&year=2018>.
- SCAG (Southern California Association of Governments). 2016. *Final 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan For Mobility, Accessibility, Sustainability, and a High Quality of Life*. Adopted April 7, 2016. Accessed May 1, 2019. <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>.
- SCAG. 2019. Profile of the City of Los Angeles. May 2019. <https://www.scag.ca.gov/Documents/LosAngeles.pdf>
- SCAG. 2020. Demographics and Growth Forecast Technical Report. https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf
- SCAQMD (South Coast Air Quality Management District). 1993. *SCAQMD Air Quality Handbook*.

- SCAQMD. 2003. *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. August 2003. Accessed July 13, 2020. <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>.
- SCAQMD. 2008. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*.
- SCAQMD. 1993. *CEQA Air Quality Handbook*.
- SCAQMD 2017. *Final 2016 Air Quality Management Plan*. March 2017. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>.
- SCAQMD. 2019. South Coast AQMD Air Quality Significance Thresholds. Revised April 2019.
- (Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx
- SWRCB (State Water Resources Control Board). 2020a. "GeoTracker." Accessed June 25, 2020. https://geotracker.waterboards.ca.gov/map/?global_id=T0607302824
- SWRCB. 2020b. Sites Identifies with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. Accessed June 25, 2020. <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>
- SWRCB. 2020c. List of Active Cease and Desist Orders and Cleanup and Abatement Orders. Accessed June 25, 2020. <https://calepa.ca.gov/SiteCleanup/CorteseList/>

6.2 ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AB	Assembly Bill
amsl	above mean sea level
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BMP	best management practice
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CBIA v. BAAQMD	California Building Industry Association v. Bay Area Air Quality
CEC	California Energy Commission
CEQA	California Environmental Quality Act
City	City of Los Angeles

Acronym	Definition
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
cy	cubic yard
dBa	decibel
DU	dwelling unit
EIR	environmental impact report
EPA	Environmental Protection Agency
GHG	greenhouse gas
gpd	gallons per day
HCR	Hillside Construction Regulation
HWRP	Hyperion Water Reclamation Plant
IS	initial study
ITE	Institute of Transportation Engineers
kWh	kilowatt-hour
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LID	Low Impact Development
LOS	level of service
Metropolitan	Metropolitan Water District of Southern California
mgd	million gallons per day
MT	metric tons
NO _x	nitrogen oxides
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PM ₁₀	particulate matter less than or equal to 10 microns in diameter
PM _{2.5}	particulate matter less than or equal to 2.5 microns in diameter
PRC	Public Resources Code
Project	Revello and Tramonto Residential Project
RFA	Residential Floor Area
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SO _x	sulfur oxides
SWPPP	Stormwater Pollution Prevention Plan

Acronym	Definition
UBC	Uniform Building Code
UWMP	Urban Water Management Plan
V/C	volume to capacity
VHFHSZ	Very High Fire Hazard Severity Zone
ZAA	Zoning Administrator's Adjustment
ZAD	Zoning Administrator's Determination
ZV	Zoning Variance