

DRAFT

Environmental Checklist Form (Initial Study) County of Los Angeles, Department of Regional Planning



Project title: Mariner's Bay Rehabilitation/ Project No. R2014-01775-(4)/ Case No.RENV201400135

Lead agency name and address: Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Anita Gutierrez, AICP, Special Projects Section, (213) 974-4813

Project sponsor's name and address: Mariner's Bay Company
9460 Wilshire Boulevard, Suite 420
Beverly Hills, CA 92012

Project location: Lease Parcel 28, 14000 Palawan Way, Marina del Rey, California 90292
APN: Thomas Guide: Page 671 J-7 and 672 A-7 USGS Quad: Venice

Gross Acreage: 18.6 acres (Total), 10.1 acres (water) 8.5 acres (Landside)

General plan designation: Marina del Rey Local Coastal Program

Community/Area wide Plan designation: Marina del Rey Specific Plan

Zoning: Marina del Rey Land Use Plan: "Palawan/Beach Area" - Residential III (Medium-density residential) and Water with a Waterfront Overlay Zone.

Description of project: The proposed project is located on at 14000 Palawan Way in the unincorporated community of Marina del Rey. The Mariner's Bay Apartments and Marina (which contains a private anchorage with 392 boat berthing spaces, of which 18 are end-ties) were constructed on the subject parcel in 1975. The subject parcel is approximately 18.64 acres in size (8.5 landside acres and 10.15 waterside acres) and is leased by the Applicant (Mariner's Bay Company) from the County of Los Angeles. The proposed project requires a ministerial Site Plan Review to authorize the Applicant's rehabilitation of the 379-unit existing apartment complex and associated site facilities/amenities over a 36-month period, beginning on or about June 2015 and completion by approximately June 2018. The proposed project includes substantial renovation of the apartment buildings' interiors and exteriors, both private and public areas, waterfront promenade, parking facilities and landscaped areas of the existing apartment complex. The subject site (Parcel 28) is also subject to an Option to Amend Lease Agreement to be approved by the County Board of Supervisors prior to initiation of the proposed rehab work at the site. The renovation project does not entail any demolition or replacement of boat slips. The rehabilitation of the facility will require the removal of approximately 8,000 cubic yards of debris (building materials removed from the structures as part of the rehab as well as landscaping and hardscape, to include asphalt/paving and pedestrian walkways, etc.) and the resurfacing of approximately 56,000 square feet of walkways/exterior common areas and drive aisles) with hardscape material. The parking garages will be painted, new lighting will be installed, and new striping and signage will be added. Per County Code, 952 parking spaces are required to service the uses to be provided on the leasehold, as follows: 612 parking spaces to service the 379 existing residential units; 95 parking spaces to service residents' guests; and 212 parking spaces to service the proposed anchorage (to be

developed on the waterside portion of the parcel on or before January 2019, and which would contain no more than 353 boat slips). The Project will provide 979 parking spaces on-site, which exceeds County Code parking requirements by 26 parking spaces.

The proposed project will include the following renovation items for the complex:

Apartment Building Façade: The existing apartment buildings located on the project site will be stripped of their current exterior façade. The exteriors of the buildings will be upgraded with engineered wood product siding. The base of the buildings will be stucco with articulated reveals to provide a modular appearance and give the lower levels a sense of scale for pedestrians. Accents of white granite wall panels are used to break up the massing of the complex. The proposed rehabilitation also includes replacement of all windows, sliding doors, and balcony decking; replacement of all exterior doors with marine galvanized hollow metal doors; and the refinishing of all balconies with engineered wood floors and treated wooden members with a glass and metal rail system.

The Apartment Building Individual Unit Interiors: All of the residential units located within the complex will be fully renovated. The renovation will include installation of new bathrooms, kitchens, flooring, and fixtures; installation of stacked washer and dryers; repair or replacement of existing waste plumbing; installation of new copper water pipes; and electrical systems and technology infrastructure upgrades (including installation of cable TV and CAT 5 wiring, installation of GFI-protected outlets, installation of new copper plumbing lines. The renovation will install energy efficient devices including low-flow toilets, dual-glazed windows and doors, low-flow faucets and showerheads, LED and fluorescent lighting, and building insulation.

Apartment Building Interior Common Areas: The interior common areas of the existing apartment buildings will be fully renovated, including installation of new carpeting, lighting and decorative finishes, and fixtures.

Exterior Common Areas:

All exterior common areas of the existing complex will be completely renovated, to include: a new hardscape and landscape; renovation of the existing gym/fitness center and men's and women's saunas; renovation of the leasing office with new exterior integral color, high density concrete panels, upgraded ADA elevators; new entry gates at the project driveways; new paving materials, fencing and landscaping in the outdoor pool area; and installation of new landscaping, lighting, promenade paving, bulkhead railing, entry drive pavers and NPDES/MS4-compliant drainage system. New landmark entry signage will include lighting, and all new landscaping. An existing surface parking lot containing 34 parking spaces will be removed to accommodate tenant amenities. Only minor grading may be necessary in conjunction with removal of this surface parking lot. The removal of this lot will not result in a parking deficit per County Code requirements for the subject parcel, because, as noted, with the proposed parking restriping, the site will contain parking in excess of County Code requirements (Code requires 952 parking spaces whereas approximately 979 parking spaces will be provided on-site). New amenities to be provided in this area will include a small park containing bocce ball courts, semi-private seating for a bbq and a fire pit, and new landscape with trees for shade. Along the south side of the site, a walkway will be added to the current landscape to allow pedestrian access along the interior portion of the site, in proximity to the buildings. This feature will provide residents improved access to the project's amenities, including outdoor recreational areas, bike depot and bike parking areas, the new park, leasing office, etc. The walkway will blend with existing walkways to allow for a continuous and user-friendly connectivity around the entire site and to the boat slips along the perimeter. Since the new walk is being integrated into the existing landscape, current road, and traffic clearances will remain unaffected.

Electrical Upgrade: The proposed project will include electrical upgrade to the entire complex. The Applicant will upgrade the main panel to each building, the wiring to each unit and install new interior panels.

The planned rehabilitation project will also include the installation of new apartment building roofs and insulation, as required; replacement of all gutters, scuppers and other roof drainage; and the repair and/or replacement of the existing hot water heating system.

The proposed landside renovation project does not entail any demolition or replacement of the existing Mariner's Bay anchorage, which is a private recreational boat anchorage containing 392 boat berthing spaces, of which 18 are end ties, located on the waterside portion of the subject parcel. Pursuant to the terms of the Option to Amend Lease Agreement for the subject Parcel 28, to be approved by the County Board of Supervisors prior to initiation of the proposed rehab work at the site, the applicant will be contractually obligated to the County to demolish the existing waterside anchorage and to construct a new private boat anchorage on the waterside portion of the subject parcel on or before January 2019. While the subject Initial Study review for the proposed landside rehabilitation project does not evaluate the future redevelopment plans for the waterside anchorage facilities, the applicant will comply with all applicable laws governing Marina development at the time of application for the new private boat anchorage on the waterside portion of the subject parcel.

Surrounding land uses and setting: The project site is located within the unincorporated Los Angeles County community of Marina del Rey. Specifically, the project site is located on Palawan Way, abutted by Marina basin "E" to the north, Marina Parcel 30 (Del Rey Yacht Club) to the east, Marina Basin D to the south. The site is currently developed with a 379-unit apartment complex located within seven three-story buildings. Existing commercial uses include a yacht broker and a tennis pro. Parking occurs within partially subterranean garages located under the apartment buildings. The site currently contains a total of 944 parking spaces, all of which parking is located within the two-level semi-subterranean parking garage located at the base of the apartment units.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Public Agency

Approval Required

Major projects in the area:

<u>Project/Case No.</u>	<u>Description and Status</u>
<u>R2010-00669/ RENV201000022</u>	<u>Parcels 42 and 43 (APN No. 4224-008-900): Coastal Development Permit for rehabilitation of the Marina del Rey Hotel, an existing 154-room hotel, and the demolition and subsequent redevelopment of the hotel's private boat anchorage.</u>
<u>R2006-03647/ CDP200600008</u>	<u>Parcel 10R (APN No. 4224-003-900): Coastal Development Permit to authorize the demolition of an existing 136-unit apartment complex and the development of a 400-unit complex (including a total of 62 affordable housing units).</u>
<u>R2006-03652/ CDP200600009</u>	<u>Parcel 14 (APN No. 4224-003-900): Coastal Development Permit to authorize the demolition of an existing parking lot and the development of a 126-unit apartment complex.</u>
<u>TR067861/ CDP200600007</u>	<u>Parcel 9U, Northern Portion (APN No. 4224-002-900): Pending Coastal Development Permit to authorize the construction of a 19-story, 288-unit hotel with a restaurant and other auxiliary facilities.</u>
<u>R2006-03643/ CDP200600006</u>	<u>Parcel 9U, Southern Portion (APN No. 4224-002-900): Coastal Development Permit to authorize the development of a public wetland and upland park.</u>
<u>R2007-01480/ CDP200700001</u>	<u>Parcels 55, 56 and W (APN No. 4224-011-901): Pending Permit to authorize the demolition of Fisherman's Village and all existing parking, landscaping, and hardscaping, and the development of a new mixed-use commercial plaza and multi-story parking structure.</u>
<u>R2005-04106/ CDP200500006</u>	<u>Parcel 27R (APN No. 4224-005-906): Coastal Development Permit to authorize the rehabilitation and expansion of the Jamaica Bay Hotel for 69 new guest rooms (total of 111 guest rooms) and a new restaurant.</u>
<u>R2006-01510/ CDP200600002 & CDP 20060003</u>	<u>Parcels 147 & 21 (APN No. 4224-006-900): Pending Coastal Development Permit to authorize the demolition of all existing landside improvements and the construction of a 114 unit senior accommodations facility, 5000 square feet of retail space and other site amenities and facilities; & 447-space parking structure, marine commercial, and community park. (Parcel 21)</u>
<u>R2009-00924/ RENV200900055</u>	<u>Parcel 145R (APN No. 4224-006-900): Interior and exterior renovation of the existing 132-room Marina International Hotel (Under Construction)</u>
<u>R2009-00752/ PP201000954</u>	<u>Parcel 64 (APN No. 4224-011-901): Interior and exterior renovation of the existing 224-unit Villa Venetia apartment complex. (Under Construction)</u>
<u>R2008-02340/ CDP200800007</u>	<u>Parcels 52R (APN No. 4224-003-900): Coastal Development Permit to authorize a dry stack boat storage facility, with capacity for 345 boats, along with appurtenant office space and customer lounge, 30 mast-up storage spaces, parking, and a new Sheriff's Department/Lifeguard Boatwright facility.</u>
<u>Project 98-134/ CDP 98-134</u>	<u>Parcel 15 (APN No. 4224-003-900): (Approved December 6, 2000) Replace existing 288-unit apartment complex with a 585-unit apartment complex.</u>

R2012-00180/
RENV201200026

Parcels 95 & LLS (APN No. 4224-005-910): Demolition of three existing office-retail structures to be replaced with two new commercial retail buildings, with rehabilitation of existing restaurant.

Project Number
FCC00011786/CDP 5-13-1292

Oxford Retention Basin Multi-Use Enhancement Project: The enhancement project will increase flood protection, reduce runoff pollution, and improve the quality of plant and wildlife habitat within the facility.

Project Number R2013-01647-
(4)/CDP5-11-131

Parcel 44 Project (APN No. 4224-008-901): Demolition of the existing mixed use building to be replaced with retail, restaurants, and a promenade with parking facilities.

Project Number SCZ11631/CDP
2014-00003

Venice Dual Force Sewer: The construction/operation of a 54-inch-diameter force main sewer line which will begin at the Venice Pumping Plant, proceed east under the Grand Canal along Marquesas Way, head southeast on Via marina and continue through a portion of the County's parking lot 13.

Reviewing Agencies:

Responsible Agencies

- None
- Regional Water Quality Control Board:
 - Los Angeles Region
 - Lahontan Region
- Army Corps of Engineers
- Coastal Commission
- State Department of Conservation, Division of Oil, Gas & Geothermal Resources

Trustee Agencies

- None
- State Dept. of Fish and Wildlife
- State Dept. of Parks and Recreation
- State Lands Commission
- University of California (Natural Land and Water Reserves System)

Special Reviewing Agencies

- None
- Santa Monica Mountains Conservancy
- National Parks
- City of Culver
- City of Los Angeles Sanitation Bureau
- South Coast Air Quality Management District
- City of Los Angeles
- Coastal Commission

County Reviewing Agencies

- DPW:
 - Land Development Division (Grading & Drainage)
 - Geotechnical & Materials Engineering Division
 - Watershed Management Division (NPDES)
 - Traffic and Lighting Division
 - Environmental Programs Division
 - Waterworks Division
 - Sewer Maintenance Division

Regional Significance

- None
- SCAG Criteria
- Air Quality
- Water Resources
- Santa Monica Mtns. Area
-

- Fire Department
 - Forestry, Environmental Division
 - Planning Division
 - Land Development Unit
 - Health Hazmat
- Sanitation District – Solid Waste
- Public Health/Environmental Health Division: Toxics Epidemiology Program (Noise)
- Sheriff Department
- Beaches and Harbors
- Subdivision Committee
-

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

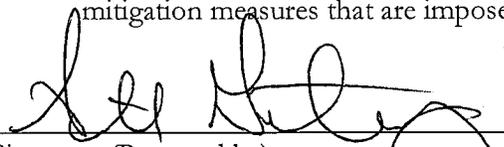
The environmental factors checked below would be potentially affected by this project.

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

DETERMINATION: (To be completed by the Lead Department.)

On the basis of this initial evaluation:

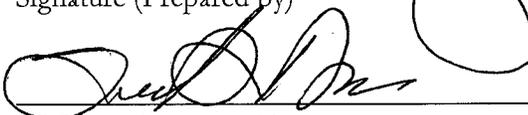
- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that 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 the 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 (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) 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.



 Signature (Prepared by)

11/7/15

 Date



 Signature (Approved by)

11/7/15

 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 the Lead Department 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 Department 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 mitigation measures has reduced an effect from "Potentially Significant Impact" to a "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 Section XVII, "Earlier Analyses," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (*State CEQA Guidelines* § 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) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significance. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.
- 8) Climate Change Impacts: When determining whether a project's impacts are significant, the analysis should consider, when relevant, the effects of future climate change on : (1) worsening hazardous conditions that pose risks to the project's inhabitants and structures (e.g., floods and wildfires), and (2) worsening the project's impacts on the environment (e.g., impacts on special status species and public health).

1. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

The project site is located on the northerly side of Palawan Way, which is not designated by the Scenic Highway Element as a scenic highway. However, the Marina del Rey Land Use Plan identifies land adjacent to the Main Channel as significant vantage points within the Marina. Thus, the project site is considered a significant vantage point and can be seen from significant vantage points throughout the Marina. Because the project would not add height or substantial building mass to existing development, the existing views to and from the project site would not be altered. The proposed project would improve the overall aesthetic of the project site by upgrading the exterior and common areas visible from nearby areas. Impacts would be less than significant. Further analysis on this topic is not required.

b) Be visible from or obstruct views from a regional riding or hiking trail?

The project site is located in an established urbanized area with existing residential and parking structures. The project site is not readily visible from any regional hiking trail. Portions of the site are visible from the Marvin Braude Bicycle Path; however, the project proposes no change in physical building footprint or height and would not further impede or change the existing views from the bicycle path. And, as noted, the proposed project would improve the overall aesthetic of the project site by upgrading the exterior and common areas visible from nearby areas. Impacts would be less than significant. Further analysis on this topic is not required.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site is currently developed with residential uses and associated parking, and is located within an urbanized community of the County unincorporated Marina del Rey. The most significant qualities of the Marina del Rey area in terms of visual resources are the waters within the small craft harbor, the boats, and boating related elements (e.g., masts, sails, moles, slips, etc.).¹ These water-oriented aesthetic qualities are visible from the project site; however, the project proposes no change in physical building footprint or height, but does propose to substantially improve the design aesthetic of the existing apartment complex. Therefore, impacts would be less than significant and further analysis of this topic is not required.

d) Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features?

The proposed project includes the rehabilitation/renovation of an existing residential apartment complex. The proposed rehabilitated residential structures are the same height and width as the existing structures, which are consistent with the height limitations of the project site zoning. The building would be of a similar height and massing to the existing structures on the project site. Moreover, the significant aesthetic design upgrades to the existing apartment complex that will result from the

¹ Los Angeles County Local Coastal Program, Marina Del Rey Land Use Plan, February 8, 2012, pg. 9-1 through pg. 9-4.

proposed project will serve to greatly improve the existing visual character and quality of the site. Therefore, impacts are considered less than significant and further analysis is not required on this topic.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?

The proposed project does not include the construction of additional floors to the rehabilitated buildings nor does it include an increase of floor area or bulk. The buildings are located at a location where shadows that are cast due to the building height would be primarily on the Marina Basin E to the north, which is the existing condition. Since the proposed project design would not include a change in building height or bulk, the shadows that would be cast with project implementation would remain the same, and currently exist at the project site. Furthermore, the proposed project would include the rehabilitation of exterior windows and glass doors, which would be designed to produce minimal glare as required by County Standards. Additionally, the proposed project will include modern lighting features that would minimize impacts. As such, impacts are considered less than significant and further analysis is not required on this topic.

2. AGRICULTURE / FOREST

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.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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"/>

The project site is not located in an area that is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation. No impact would occur. Further analysis regarding this topic would not be required.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Opportunity Area, or with a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is located in the community of Marina del Rey, which is designated as Specific Plan Zone as zoned under the County of Los Angeles. Parcel 28's land use designations per the certified Marina del Rey Local Coastal Program (certified LCP) are Residential III-Waterfront Overlay Zone & Water. The project site does not have nor is it located near an area that is contracted under the Williamson Act. Therefore, no impacts would occur to agricultural land uses or conflict with any agricultural zones and further analysis on this topic is not required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is located in the unincorporated community of Marina del Rey, which is designated as Specific Plan Zone as zoned under the County of Los Angeles. Parcel 28's land use designations per the certified LCP are Residential III-Waterfront Overlay Zone & Water. The project site is not located near or within an area that is zoned as or for forestland or timberland. Therefore, no impacts would occur and further analysis on this topic is not required.

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

The project site is located in the unincorporated community of Marina del Rey, and is within the Marina del Rey Specific Plan area pursuant to the County of Los Angeles Zoning Code. Parcel 28's land use designations per the certified LCP are Residential III-Waterfront Overlay Zone & Water. The project site is not located near or within an area that is zoned as forestland or timberland. Therefore, no impacts resulting from the loss of forestland would occur and further analysis on this topic is not required.

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

The project site is located in the unincorporated community of Marina del Rey, a highly urbanized area that is within the Marina del Rey Specific Plan area pursuant to the County of Los Angeles Zoning Code. The proposed project site does not contain agricultural farmland nor is it near an area of agricultural farmland. Therefore, implementation of the proposed project would not convert farmland to non-agricultural land. No further analysis on this topic is required.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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According to the SCAQMD CEQA Air Quality Handbook, a project would have a significant impact if it conflicts with or delays implementation of the applicable Air Quality Management Plan (AQMP). A project is consistent if it meets the following indicators:

- The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP;
- The project will not exceed the assumptions in the AQMP in 2010 or increments based on the year of project buildout.

As discussed later in this section, the proposed project would not exceed the significance thresholds for construction or the operational emissions. In addition, the project would not exceed the screening criteria for the localized significance thresholds. Therefore, since the project would not exceed the thresholds, it would not increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency with the assumptions in the AQMP is established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast. The 2012 Air Quality Management Plan based its assumptions on growth forecasts contained in the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan and Sustainable Communities Strategy (2012 RTP/SCS).² The 2012 RTP/SCS is based on growth assumptions through 2035 developed by each of the cities and counties in the SCAG region. The proposed project will not increase the number of dwelling units or increase density on the project site, it includes a renovation and upgrade of an existing permitted use. Consequently, the project would not result in an increase in population or vehicle trips from the project site. Therefore, the project would not cause an exceedance of the growth projections in the AQMP. Impacts would be less than significant.

² South Coast Air Quality Management District, *Final 2012 Air Quality Management Plan*, (2013) 3-1.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Emissions

Air pollutant emissions of volatile reactive organic compounds (VOCs), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), respirable particulate matter less than 10 microns in diameter (PM10), and fine particulate matter less than 2.5 microns in diameter (PM2.5) from the proposed project are estimated using the California Emissions Estimator Model (CalEEMod).³ CalEEMod is a program that calculates air pollutant emissions from land use sources and incorporates the California Air Resources Board EMFAC2007 model for on-road vehicle emissions and the OFFROAD2007 model for off-road vehicle emissions. The model also incorporates factors specific to the project region, such as vehicle fleet mixes. During project construction, the model can analyze emissions that occur during different phases, such as grading and building construction, concurrently or separately.

Construction activities associated with the proposed project would occur in phases over three years. For the purposes of the modeling analysis, construction would occur from June 2015 to June 2018. The project site consists of seven separate three-story buildings. Two-level, semi-subterranean parking garages are located at the base of the apartment units and provide parking for 944 vehicles. All exterior common areas of the existing complex will be completely renovated, to include: new hardscape and landscape and outdoor resident amenity park space; renovation of the existing gym/fitness center and men's and women's saunas; renovation of the leasing office with new exterior integral color, high density concrete panels, upgraded ADA elevators in each of the buildings; new entry gates at the project driveways; new paving materials, fencing and landscaping in the outdoor pool area; restriping of the existing parking areas to provide approximately 979 parking spaces (which exceeds County Code requirements for same); and installation of new landscaping, lighting, promenade paving, bulkhead railing, entry drive pavers and NPDES/MS4-compliant drainage system. According to information obtained from the project applicant, the project structures are anticipated to be renovated sequentially, with each building taking approximately five months. An estimated 8,000 cubic yards of debris will be created during renovation and construction, as well as the repaving of approximately 56,000 square feet of asphalt or pervious material. A single CalEEMod run was performed, which represents one of four project phases. The remaining three phases would include similar construction activities and would result in similar emissions. The exception would be grading emissions, (associated with only minor grading related to removal of the surface parking lot) which were all included in the first phase and therefore would not be included in subsequent phases.

Site-specific or project-specific data were used in the CalEEMod model where available. The number and types of construction equipment, vendor trips (e.g., transport of building materials), and worker trips were based on values provided in the CalEEMod model. Construction emissions would be generated from the use of mobile equipment and motor vehicles and the application of architectural coatings and paving materials. The results of the analysis are shown in **Table 1, Estimated Construction Emissions**. As indicated below, emissions would not exceed the SCAQMD's significance thresholds during construction and impacts would be less than significant.

³ South Coast Air Quality Management District, "CalEEMod, Version 2011.1.1," <http://www.caleemod.com/>.

Table 1
Estimated Construction Emissions

Construction Year	Maximum Emissions in Pounds per Day					
	VOC	NO _x	CO	SO _x	PM10	PM2.5
2015	1.57	32.03	25.25	0.04	1.07	0.92
2016	17.33	81.78	89.35	0.15	6.84	3.69
2017	15.19	49.10	61.54	0.11	5.76	2.75
2018	13.45	28.84	41.39	0.08	4.93	2.05
Maximum pounds per day:	17.33	81.78	89.35	0.15	6.84	3.69
SCAQMD Threshold:	75	100	550	150	150	55
Exceeds Threshold?	NO	NO	NO	NO	NO	NO

Source: Impact Sciences, Inc., (2013). Emissions calculations are provided in **Appendix 1**.
Note: Totals in table may not appear to add exactly due to rounding in the computer model calculations.

Operational Emissions

The proposed project would not result in an increase in project related traffic, population, or residential units. Therefore, the proposed project would not result in an increase in existing operational emissions. The average daily trips associated with the project would remain substantially the same as the existing average daily trips. Therefore, the proposed project would not result in an incremental increase in mobile source emissions. As part of the renovation, the project would upgrade the lighting fixtures and appliances to energy efficient models. This would result in a net reduction in stationary and area source emissions compared to the existing site. Based on this, the net operational emissions associated with complete buildout and operation of the project would not exceed the SCAQMD's significance thresholds during operation. Therefore, operational emissions are considered less than significant. No further analysis of this topic is required.

c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

According to the SCAQMD CEQA Air Quality Handbook, projects that are within the emission thresholds identified above should be considered less than significant on a cumulative basis unless there is other pertinent information to the contrary.⁴ As previously discussed, the project would not exceed the construction or operational project-level thresholds. Thus, the project would not result in a cumulatively considerable net increase in emissions and impacts would be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

Localized Significance Thresholds Analysis

The SCAQMD recommends that the potential localized impacts be evaluated on the ambient air concentrations due to on-site construction emissions of NO_x, CO, PM10, and PM2.5. The SCAQMD Final Localized Significance Threshold

⁴ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, (1993) 9–12.

Methodology (LST Methodology) includes screening tables that can be used to determine the maximum allowable daily emissions that would satisfy the LSTs (i.e., not cause an exceedance of the applicable concentration limits). The allowable emission rates depend on (1) the Source Receptor Area (SRA) in which the project is located, (2) the size of the project site, and (3) the distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals).

The project site is located in Marina del Rey, which is in SRA 2 (Northwest Los Angeles County Coastal). The total project site is 22.6 acres, with 13.1 landside acres. Each construction phase would renovate an area of approximately 1.87 acres. The nearest sensitive receptors would be potentially located in the apartments immediately adjacent to the project site, within 25 meters of the project boundary. According to the LST Methodology, “projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.”⁵ The thresholds are based on a 25-meter distance and a 1-acre project site, which provides for a conservative analysis. The LSTs for the proposed project are shown in **Table 2, Localized Significance Thresholds Analysis during Construction**, and are compared with the maximum daily on-site construction emissions.

Table 2
Localized Significance Thresholds Analysis During Construction

Pollutant	Maximum On-Site Emissions ¹ (Pounds per day)	LST Thresholds ² (Pounds per day)	Exceeds LST?
Nitrogen Oxides (NO _x)	31.84	103	NO
Carbon Monoxide (CO)	23.99	562	NO
Respirable Particulate Matter (PM ₁₀)	2.45	4	NO
Fine Particulate Matter (PM _{2.5})	2.23	3	NO

Source: Impact Sciences, Inc., (2013). Emissions calculations are provided in **Appendix 1**.

¹ PM₁₀ and PM_{2.5} emissions reflect compliance with SCAQMD Rule 403 (Fugitive Dust).

² South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, (2008).

The project would not result in an incremental increase in operational emissions. Therefore, an LST analysis for on-site operational emissions is not required. Therefore, construction and operation of the project would generate incremental on-site emissions that are less than the site-specific localized significance thresholds. Therefore the project would have a less than significant impact on localized air quality.

It should be noted that the US Environmental Protection Agency (EPA) promulgated a new 1-hour National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO₂). The new 1-hour standard is 100 parts per billion (ppb) (188 micrograms per cubic meter [$\mu\text{g}/\text{m}^3$]) and went into effect on April 12, 2010. Compliance with the standard is determined on a statistical basis (i.e., the three-year average of the 98th-percentile of the annual distribution of daily maximum 1-hour concentrations). The US EPA also retained the existing annual average standard of 53 ppb (100 $\mu\text{g}/\text{m}^3$). The LST analysis should be based on the most stringent ambient air quality standards in effect. Prior to the new US EPA standard, the 1-hour California Ambient Air Quality Standard (CAAQS) for nitrogen dioxide (NO₂) was the most stringent standard at 180 ppb. The SCAQMD screening tables for NO₂ are based on the 1-hour CAAQS. The SCAQMD has not revised the LST screening tables to correspond to the new US EPA 1-hour NO₂ standard. However, as shown in **Table 2**, the NO_x emissions are less than 15 percent of the previous threshold. Given that the project’s NO_x emissions are well under the previous threshold, the project would not exceed the new US EPA 1-hour NO₂ standard at nearby sensitive receptors.

⁵ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, (2008).

Operational CO “Hotspots” Analysis

Emissions associated with the proposed project would primarily be generated by motor vehicles visiting the site. Traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). Localized areas where ambient concentrations exceed state and/or federal standards are termed CO “hotspots.” Such hot spots are defined as locations where the ambient CO concentrations exceed the state or federal ambient air quality standards. CO is produced in greatest quantities from vehicle combustion and is usually concentrated at or near ground level because it does not readily disperse into the atmosphere. As a result, potential air quality impacts to sensitive receptors are assessed through an analysis of localized CO concentrations. Areas of vehicle congestion have the potential to create CO hotspots that exceed the state ambient air quality 1-hour standard of 20 ppm or the 8-hour standard of 9.0 ppm. The federal levels are less stringent than the state standards and are based on 1- and 8-hour standards of 35 and 9 ppm, respectively. Thus, an exceedance condition would occur based on the state standards prior to exceedance of the federal standard. The project does not propose the addition of new residential units or the extension of its existing facilities and therefore would not increase vehicles traveled to and from the site. Therefore, the proposed project would not cause an incremental increase in CO hotspots and would be less than significant with respect to this criterion.

Toxic Air Contaminants

The residential land uses associated with the proposed project are not anticipated to emit toxic air contaminants (TACs) in appreciable quantities. The SCAQMD has established thresholds for TACs. Emissions of TACs would be significant if sensitive receptors would be exposed to a carcinogenic risk that exceeds 10 in 1 million or a noncancer Hazard Index greater than 1.0. Sources of TACs from residential land uses may include household solvents and cleaners and motor vehicle emissions. However, residences do not typically generate TAC emissions in quantities that would exceed the SCAQMD thresholds. Accordingly, no significant impacts with respect to the criteria listed above are expected to occur.

Motor vehicles emit TACs which contain carcinogens such as diesel particulate matter from trucks, and benzene and 1,3-butadiene from passenger vehicles. Concentrations of these TACs are reduced with increasing distance. The California Air Resources Board (CARB) Air Quality and Land Use Handbook recommends that lead agencies, where possible, avoid locating new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.⁶ Regional access to the project is provided by California State Route 1 (Pacific Coast Highway) located approximately 1,500 feet to the northeast of the project, Highway 90 (Marina Del Rey Freeway) located approximately 2,135 feet to the northeast of the project, Highway 405 (San Diego Freeway) approximately 14,600 feet to the east of the project, and Interstate 10 (Santa Monica Freeway) approximately 17,500 feet to the northwest of the project. While the proposed project is not a new sensitive land use, it is consistent with CARB’s recommendations, as described above. Therefore, the project will not expose sensitive receptors to high TAC concentrations and is considered to have a less than significant impact.

The project would comply with SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), which requires owners and operators of any demolition or renovation activity to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials. Compliance with the provisions of this rule would ensure no impacts would occur from any asbestos-containing materials.

⁶ California Air Resources Board, *Air Quality and Land Use Handbook*, (2005) 4.

e) Create objectionable odors affecting a substantial number of people?

The proposed project consists of renovating the existing land uses and would not develop new land uses. The residential land uses associated with the proposed project are not expected to cause odor nuisances, dust, and hazardous emissions. Construction of the project is temporary and is not expected to cause an odor nuisance. Additionally, the adjacent land uses are such that the project residents would not be subject to substantial sources of objectionable odors from any surrounding land uses. Therefore, the proposed project would not have a significant impact on air quality with respect to this criterion. No further analysis of is required.

4. BIOLOGICAL RESOURCES

	<i>Less Than Significant</i>	<i>Less Than Significant</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Impact</i>	<i>Impact</i>

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 (CDFW) or US Fish and Wildlife Service (USFWS)?

The project site is currently developed with apartment buildings, associated parking, an outdoor pool and tennis courts, and hardscaped and ornamentally landscaped areas, without any sensitive natural habitat areas. The landside parcel contains no habitat areas that may support any federally or state-listed Endangered or Threatened species, such as the least tern that may occur at Venice Beach or foraging over the marina waters. The project site may provide nesting habitat for sensitive bird species in areas that may be affected by project construction or infrastructure improvements; however, the proposed project would not have a substantial adverse effect to a species regulated by the California Department of Fish and Wildlife or the US Fish and Wildlife Service. There is a possibility that special-status birds could establish nests in the landscape trees within or adjacent to the project site that may affect the breeding success for those species. Applicant’s mandatory compliance with all applicable provisions contained in LCP Policy Nos. 23 (Marina del Rey Tree Pruning and Tree Removal Policy), and 34 (Marina del Rey Leasehold Tree Pruning and Tree Removal Policy), as well as mitigation measures recommended within the LCP to minimize impacts to special-status biological resources (contained within “Biological Report & Construction Monitoring Requirements”) (BIOTA 1) will reduce this potential impact to bird species to a less than significant level. Therefore, no further analysis would be required on this topic with the adoption of the recommended mitigation measure.

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

All renovation activities associated with the proposed project would occur on the landside parcel. The project site is urbanized and does not contain any sensitive natural communities—such as wetlands, oak woodlands or riparian habitat—identified in local or regional plans, policies, regulations, or by CDFW or USFWS. Moreover, there are no known “important biological resources” located on the subject property, as defined in the certified Local Coastal Program for Marina del Rey. Therefore, no further analysis would be required on this topic. However, as noted, there is a possibility that special-status birds could establish nests in the landscape trees within or adjacent to the project site that may affect the breeding success for those species. Applicant’s mandatory compliance with all applicable provisions contained in LCP Policy Nos. 23 (Marina del Rey Tree Pruning and Tree Removal Policy), and 34 (Marina del Rey Leasehold Tree Pruning and Tree Removal Policy), as well as mitigation measures recommended to minimize impacts to special-status biological resources (contained within “Biological Report & Construction Monitoring Requirements”) (BIOTA 1) will reduce this potential impact to special-status bird species to a less than significant level. Therefore, no further analysis would be required on this topic with the adoption of the recommended mitigation measure.

c) Have a substantial adverse effect on federally or state protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States, as defined by § 404 of the federal Clean Water Act or California Fish & Game code § 1600, et seq. through direct removal, filling, hydrological interruption, or other means?

The project site is currently developed. All renovation activities would occur on the landside portion of the parcel which and does not contain wetlands, vernal pools, natural drainage courses, or waters of the United States. Since the project site does not have any natural jurisdictional habitat areas that can be affected, removed, or filled by construction, fire clearance, or flood related improvements, there would be no impacts. Therefore, no further analysis would be required on this topic.

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?

The project site is not adjacent to or located in a wildlife corridor, nor is it adjacent to an open space linkage. As noted, the project does not involve any waterside construction or other work within the small craft harbor. The above discussion regarding potential impacts associated with renovation and redevelopment of the project site to nesting and roosting birds such as the Great Blue Heron, Black-crowned Night Heron, Double-crested Cormorant, and the Great Egret conclude that these may be mitigated to a less than significant level with the adoption of the recommended mitigation measure (BIOTA 1). Impacts to nesting birds would be less than significant with mitigation and no further analysis would be required. In addition, there would be no impact on wildlife movement corridors.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or otherwise contain oak or other unique native trees (junipers, Joshuas, Southern California black walnut, etc.)?

The project site contains no habitat areas that support oak woodlands and no native trees occur on the project site. Therefore, no oak resources would be impacted and no further analysis is required.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.56, Part 16), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, § 22.56.215), and Sensitive Environmental Resource Areas (SERAs) (L.A. County Code, Title 22, Ch. 22.44, Part 6)?

The subject property has been developed for many years with an apartment complex and is located in an urbanized setting within the state-designated Coastal Zone. The project site is not located within a designated SEA, coastal Sensitive Environmental Resource Area (“SEEA” or “ESHA”). The closest SEA to the project site is the Ballona Creek SEA, located approximately 1 mile southeast of the project site. Because the project site is not located within or adjacent to an SEA or SERA, no impacts would occur from implementation of the proposed project. Moreover, there are no known “important biological resources” located on the subject property, as defined in the certified Local Coastal Program for Marina del Rey. As noted in the response to item 4(a) above, there is a possibility that special-status birds could establish nests in the landscape trees within or adjacent to the project site that many affect the breeding success for those species; however, Applicant’s mandatory compliance with all applicable provisions contained in LCP Policy Nos. 23 (Marina del Rey Tree Pruning and Tree Removal Policy), and 34 (Marina del Rey Leasehold Tree Pruning and Tree Removal Policy), as well as mitigation measures recommended to minimize impacts to special-status biological resources (contained within “Biological Report & Construction Monitoring Requirements”) (BIOTA 1) will reduce this potential impact to bird species to a less than significant level. Therefore, no further analysis would be required on this topic as the Applicant will comply with all applicable policies.

g) Conflict with the provisions of an adopted state, regional, or local habitat conservation plan?

As described above, mitigation measures will be imposed to ensure potential project impacts to nesting birds are reduced to a less than significant level. The proposed project would not conflict with any adopted state, regional, or local habitat conservation plan, as none exist in the project vicinity. Therefore, the proposed project would not conflict with provisions of any habitat conservation plan and no further analysis is required.

MITIGATION MEASURES:

BIOTA-1: Prior to and during all project-related construction activities, Applicant shall strictly comply with all applicable provisions contained in Policy Nos. 23 (Marina del Rey Tree Pruning and Tree Removal Policy) and 34 (Marina del Rey Leasehold Tree Pruning and Tree Removal Policy) as well as mitigation measures recommended to minimize impacts to special-status biological resources (contained within “Biological Report & Construction Monitoring Requirements”) of the certified LCP.

5. CULTURAL RESOURCES

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

The proposed project site does not contain known historic structures and is not considered a historic site according to of the Office of Historic Preservation website.⁷ Furthermore, the Marina del Rey Land Use Plan does not identify any known historical structures or sites within the community of Marina Del Rey.⁸ Therefore, implementation of the proposed project site would not include renovation of a historic structure or historic site. As such, the proposed project would have no impact on historical resources and no further analysis is required.

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

The proposed project site is located in an area of Marina del Rey that is currently developed and has been developed for the past 40 years; as noted, the project proposes rehabilitation of an existing apartment complex and its appurtenant landside facilities and does not involve demolition of the existing apartments or significant landform excavation or grading. The proposed project site does not contain known archaeological resources, drainage courses, springs, knolls, rock outcroppings, or oak trees that indicate potential archaeological sensitivity. The closest area containing known archaeological resources is the Ballona Creek Watershed area, approximately 1 mile from the project site, where remnants of past human activity have been located. Any resources on Marina del Rey land already altered or designated for development have been or have already been impacted. The proposed project would have no impact on archaeological resources and no further analysis is required.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or contain rock formations indicating potential paleontological resources?

The proposed project site is currently developed with a 379-unit residential apartment complex. As described above, the proposed project site has been urbanized over the past 40 years and the likelihood of paleontological resources existing under the project site is limited. The proposed project would involve limited debris removal (i.e., removal and replacement of exterior hardscape and some of the existing landscaping) on site with no unique geologic feature. Additionally, the project site is not adjacent to any unique geologic features. Since the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature there would be no impacts. Further analysis on this topic would not be required.

⁷ Office of Historic Preservation, California State Parks, California Historical Resources, <http://ohp.parks.ca.gov/listedresources/> Accessed November 11, 2013.

⁸ Los Angeles County Local Coastal Program, Marina Del Rey Land Use Plan, February 8, 2012, pg. 7-1 through pg. 7-3.

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

The proposed apartment rehabilitation project does not propose any significant earth excavation or landform alteration, and the subject property's earth is comprised of fill material imported to the site during Marina del Rey's construction in the early 1960s; as such, human remains are not present on the site. The proposed project would thus have no impact on human remains and no further analysis is required.

6. ENERGY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Conflict with Los Angeles County Green Building Ordinance (L.A. County Code Title 22, Ch. 22.52, Part 20 and Title 21, § 21.24.440) or Drought Tolerant Landscaping Ordinance (L.A. County Code, Title 21, § 21.24.430 and Title 22, Ch. 22.52, Part 21)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As a rehabilitation of existing apartment facilities with no new floor area expansion being proposed, the proposed project is exempt from the County's Green Building Ordinance. Project landscaping installed as part of the project will be compliant with the County's Drought Tolerant Landscaping Ordinance. Further, the project would be developed in compliance with all state and local regulations related to energy conservation. Therefore, impacts are considered less than significant and additional analysis is not required.

b) Involve the inefficient use of energy resources (see Appendix F of the CEQA Guidelines)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is currently served by Southern California Edison for its electrical needs. The existing residential uses on the project site are currently outdated with respect to energy reduction resources within its design. Rehabilitation of the Parcel 28 structures would include installation of energy efficient devices such as, low-flow toilets, dual-glazed windows and doors, low-flow faucets and showerheads, LED and fluorescent lighting, and building insulation. This would reduce the net amount of energy that the proposed project would require, compared to existing conditions.

7. GEOLOGY AND SOILS

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Expose people or structures to 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 active fault trace? Refer to Division of Mines and Geology Special Publication 42.

As noted, the proposed project involves the rehabilitation/renovation of an existing apartment complex; construction of new buildings is not proposed. The proposed project site is located in Southern California, which is considered an active seismic area; however, the proposed project is not located in an active or potentially active fault zone or Alquist-Priolo Earthquake Fault Zone.⁹ Moreover, during the plan check process, the proposed project will be required to comply with all applicable seismic engineering standards enforced by LA County Division of Building and Safety, as applicable. Since the proposed project is not located in an active or potentially active fault zone or Alquist-Priolo Earthquake Fault Zone and the project will be subject to the County's applicable seismic engineering standards, impacts would be less than significant, and no further analysis would be required.

ii) Strong seismic ground shaking?

The proposed project involves the rehabilitation/renovation of an existing apartment complex; construction of new structures is not proposed. The proposed project site is located in Southern California, which is considered an active seismic area; however, the proposed project is not located in an active or potentially active fault zone or Alquist-Priolo Earthquake Fault Zone.¹⁰ Moreover, during the plan check process, the proposed project will be required to comply with all applicable seismic engineering standards enforced by LA County Division of Building and Safety, as applicable; potential impacts associated with strong seismic ground shaking would thus be less than significant and no additional analysis is required on this topic.

iii) Seismic-related ground failure, including liquefaction and lateral spreading?

The proposed project site is located in an area that has been designated as a liquefiable area.¹¹ Furthermore, the proposed project is located within an area having a high groundwater level.¹² As noted, the proposed project involves rehabilitation of

⁹ County of Los Angeles, Department of Regional Planning, Marina Del Rey Land Use Plan, February 8, 2012, pg. 10-2.

¹⁰ County of Los Angeles, Department of Regional Planning, Marina Del Rey Land Use Plan, February 8, 2012, pg. 10-2.

¹¹ County of Los Angeles, Department of Regional Planning, County of Los Angeles General Plan, Safety Element, Plate 4, Liquefaction Susceptibility.

existing 379-unit residential apartment complex; no expansion of the exiting floor area is being proposed. If required by the Los Angeles County Department of Public Works (DPW) as part of the normal building permit plan check process, the applicant would submit a geotechnical report to DPW to assess liquefaction potential at the site and assign appropriate structural engineering measures to address any such threat. Impacts are thus considered less than significant and no further analysis of this topic is required.

iv) Landslides?

The proposed project site is located on land that is topographically flat. There are no hills, mounds, or mountains located on the proposed project site. Furthermore, the surrounding area of the project site is topographically flat as well. The proposed project is not located in an area containing a major landslide; therefore, there would be no impacts, and no further analysis would be required.

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

The proposed project site is located on land that is topographically flat. There are no hills, mounds, or mountains located on the proposed project site. Furthermore, the surrounding area of the project site is topographically flat as well. The proposed project is currently developed with parking and residential structures. An adequate drainage system currently exists on the project site, and only minimal site excavation is proposed (associated with removal of existing landscape and hardscape on the site and to re-level the complex's main entry driveway); since the proposed project site is currently developed with non-permeable surfaces and would remain so developed after the proposed rehabilitation project, and the project involves only minimal site excavation, the project site would not be subject to high erosion. Because the proposed project is not located in an area containing easily erodible soil, impacts are considered less than significant, and no further analysis is required.

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?

The proposed project site is located in an area that has been designated as a liquefiable area (State of California Seismic Hazards Zone Map – Venice Quad). Furthermore, the proposed project is located within an area having a high groundwater level. As noted, the proposed project involves the rehabilitation/renovation of an existing apartment residential facility. No new structures are being proposed. If required by DPW as part of the normal building permit plan check process, the applicant would submit a geotechnical report to DPW to determine whether liquefaction and/or groundwater level could pose a threat to the project site and assign appropriate structural engineering measures addressing any such threat. As such, impacts are considered less than significant and no additional analysis is warranted.

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

The project site is not located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994). As such, the proposed project (which involves the renovation/rehabilitation of existing facilities with new floor area expansion), would not create a substantial risk to life or property on these grounds; no additional analysis is required.

¹² County of Los Angeles, Department of Regional Planning, County of Los Angeles General Plan, Safety Element, Plate 3, Shallow and Perched Groundwater.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?

The proposed project does not include the use of a septic system as sanitary sewers are used in the project area. Wastewater generated at the project site is collected and conveyed by a sewer system owned and operated by the Los Angeles County Department of Public Works and treated by an agreement with the City of Los Angeles. The proposed project would have no impact in regard to the use of septic systems or alternative wastewater disposal. No further analysis is required.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, § 22.56.215) or hillside design standards in the County General Plan Conservation and Open Space Element?

The proposed project site is located on land that is topographically flat and therefore the project site not located within a Hillside Management Area. There are no hills, mounds, or mountains on the project site that could result in the project site having slope instability or conflict with the Hillside Management design standards. No substantial alteration of topography is involved due to the fact that all existing buildings would be maintained in place and would merely be renovated. Therefore, no impacts would occur and no further analysis on this topic would be required.

8. GREENHOUSE GAS EMISSIONS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Generate greenhouse gas (GHGs) 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"/>
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The proposed project would have a significant impact on global climate change if the project would emit significant amounts of greenhouse gases (GHGs). Construction of the proposed project would result in one-time emissions of GHGs. These emissions, primarily carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), are the result of fuel combustion by construction equipment and motor vehicles. The other primary GHGs (hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) are associated with specific industrial sources and would not be emitted by the project. The emissions of GHGs were estimated with CalEEMod using the same parameters for criteria pollutants as previously discussed.

Table 3, Estimated Construction GHG Emissions, lists the estimated GHG emissions associated with construction of the project. Greenhouse gas emissions associated with project construction were assumed to occur in phases over three years. For the purposes of the modeling analysis, construction would occur from June 2015 to June 2018. During the first year (2015) demolition would occur for six months and would continue through the first half of 2016. Renovation/construction activities are assumed to begin in 2016 and continue through 2018. Paving and coating would occur in 2016 and 2017. The SCAQMD recommends amortizing construction-related GHG emissions over a project's lifetime in order to include these emissions as part of a project's annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. The SCAQMD has defined a project lifetime to be a 30-year period. In accordance with this methodology, the project's construction GHG emissions have been amortized over a 30-year period.

Table 3
Estimated Construction GHG Emissions

GHG Emissions	Emissions (Metric Tons CO ₂ e/year)
2015	291
2016	1,266
2017	996
2018	352
One-Time Total Construction GHG Emissions	2,905
Amortized over Project Lifetime	97

Source: Impact Sciences, Inc., (2013). Emissions calculations are provided in **Appendix 1**.

Note: Totals in table may not appear to add exactly due to rounding.

At full buildout, the project would result in direct annual emissions of GHGs during project operation. These emissions, primarily CO₂, CH₄, and N₂O are the result of fuel combustion from building heating systems and motor vehicles. Building and motor vehicle air conditioning systems may use hydrofluorocarbons (and hydrochlorofluorocarbons and chlorofluorocarbons to the extent that they have not been completely phased out at later dates).

The project does not propose an increase in the number residential units currently existing on-site. Therefore, the project would not result in an incremental increase over the existing GHG emissions. In addition, the proposed project would result in the installation of energy saving features such as low flow toilets, dual glazed windows and doors, low flow heads and faucets, LED lighting, improved insulation, and energy-efficient lighting. These changes would cause a reduction in operational GHG emissions since the renovated residential units and associated facilities would be more energy efficient.

The GHG emissions associated with the proposed project are compared with the SCAQMD's threshold of significance for all land use projects, which is 3,000 metric tons of CO₂ equivalent (MTCO₂e) per year. Because the project would result in minor amounts of construction-related GHG emissions and would reduce operational GHG emissions, the project would not exceed the draft SCAQMD threshold of significance. The proposed project would result in a less than significant impact with respect to GHG emissions.

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

Project impacts would have a cumulatively considerable contribution to global climate change impacts if the project is not consistent with an applicable plan, policy, or regulation concerning greenhouse gas reductions. The County of Los Angeles has adopted a green building program; however, it applies to new buildings or first-time initial tenant improvements greater than or equal to 10,000 square feet. The LID ordinance applies to residential (5 units or greater) and non-residential projects that alter existing impervious surfaces. Projects that alter less than 50 percent of the existing impervious surface must comply with LID best management practices that promote infiltration and beneficial use of stormwater runoff for the altered portion. If greater than 50 percent of the existing impervious surface is altered, the entire site must comply with LID best management practices. The LID ordinance requires the use of LID principles in development projects and encourages site sustainability and smart growth in a manner that respects and preserves the characteristics of the County's watersheds, drainage paths, water supplies, and natural resources. The project would comply with the LID ordinance, in the event the County determines the project is eligible for compliance with the ordinance.

In addition to complying with County of Los Angeles requirements, lead agencies, under the California Environmental Quality Act (CEQA), may look to and assess general compliance with comparable regulatory schemes.¹³ The goal of Assembly Bill 32, The Global Warming Solutions Act of 2006, is to reduce statewide GHG emissions to 1990 levels by 2020. In order to achieve the state mandate of AB 32, CARB has been tasked with implementing statewide regulatory measures to reduce GHG emissions from all sectors.

In December 2008, CARB adopted the Climate Change Scoping Plan, which details strategies to meet that goal. The Scoping Plan instructs local governments to establish sustainable community strategies to reduce GHG emissions associated with transportation, energy, and water, as required under Senate Bill 375. The Climate Change Scoping Plan recommends energy-

¹³ See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 [“[A] lead agency’s use of existing environmental standards in determining the significance of a project’s environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution.”]. Lead agencies can, and often do, use regulatory agencies’ performance standards. A project’s compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 106-09 (upholding use of regulatory agency performance standard).

efficiency measures in buildings such as maximizing the use of energy-efficient appliances and lighting as well as complying with green building standards that result in decreased energy consumption compared to Title 24 building codes.

The purpose of the proposed project is to renovate an existing multi-family residential land use. The project would neither increase the number of residential units nor cause an expansion of the amount of floor area currently developed on the site. The project would not increase the number of vehicle trips to or from the site. The project incorporates design standards and measures that are both feasible and consistent with many of the GHG reduction measures recommended for new projects. The proposed project would install energy-efficient lighting and low flow fixtures. Additionally, any renovation and demolition debris that would be generated by the proposed project would be subject to the diversion rate of Unincorporated Los Angeles County, allowing approximately 54 percent of the debris to be diverted and recycled. These measures would result in a net reduction in GHG emissions compared to the existing site.

According to data presented by the California Air Pollution Control Officer's Association (CAPCOA), the use of energy efficient appliances in residential units can reduce GHG emissions by 2 to 4 percent compared to standard appliances.¹⁴ The use of energy efficient boilers can reduce GHG emissions by 1.2 to 18.4 percent compared to standard boilers.¹⁵ The use of higher efficiency outdoor area and public street lighting can reduce GHG emissions by 16 to 40 percent compared to standard outdoor area and public lighting.¹⁶ Energy efficient indoor lighting would also reduce GHG emissions; however, the CAPCOA guidance does not provide an estimate of the level of reductions that could be expected.

Based on the project features described above, the project is generally consistent with applicable and feasible GHG reduction measures recommended by CARB and the project would result in an overall net reduction in operational GHG emissions compared to the existing site.

While no agency has formally adopted a numerical threshold to evaluate the significance of a project's GHG emissions under CEQA, it is generally the case that an individual project of this size is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory.¹⁷ GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.¹⁸ Therefore, the project's net GHG emissions, by itself, would have a less than significant impact on the environment.

¹⁴ California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures, (2010) 103-112.

¹⁵ California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures, (2010) 111-114.

¹⁶ California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures, (2010) 115-118.

¹⁷ California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, (2008) 35.

¹⁸ California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, (2008) 35.

9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Residential uses do not typically store or handle hazardous materials. However, personal and support services, such as janitorial services, could store small amounts of paint, cleaning substances, and chlorine. Any amount of hazardous materials that would be stored on-site upon project completion would be subject to federal and state laws pertaining to the storage, generation, and disposal of hazardous waste materials. Since the proposed project could store hazardous materials on-site pertaining to cleaning supplies, the proposed project site would be governed by federal, state, and local laws to ensure the proper use, storage, and transport of such materials. Impacts would be less than significant and further analysis on this topic would not be required.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project could use hazardous materials such as paints, cleaning agents, aerosol cans, landscaping-related chemicals, and common household substances such as bleaches during rehabilitation activities on the project site, as well as during operation of the uses on the project site. All uses and storage of these materials could be subject to federal, state, and local laws pertaining to the use, storage, and transportation of these hazardous materials. Most of the hazardous materials indicated above are allowed to be disposed of at the local Class II and Class III landfills that serve the proposed project site and community of Marina del Rey. Since the proposed project would be required to abide by federal, state, and local laws pertaining to the use, storage, and transportation of these materials, the likelihood of an accidental release occurring and creating a significant hazard to the public would be minimal. Therefore, impacts would be less than significant. No further analysis is required on this topic.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site consists of residential units; however, the proposed project would not include the storage of large quantities of hazardous materials or pressurized tanks. Consequently, there would be no impact from hazardous materials. Further analysis on this topic is not required.

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

The project site is not located on a parcel of land that has been included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.¹⁹ The closest site that is included on a list of hazardous materials sites is located at 4144 Glencoe Avenue, approximately 1 mile northeast of the project site. Since the proposed project site is not located on a site that is listed as a hazardous materials site, there would be no impacts. Further analysis on this topic would not be required.

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

The project site is located approximately 3 miles to the northwest of Los Angeles International Airport (LAX) and approximately 1.5 miles southeast of the Santa Monica Airport. The project site is not located within 2 miles of LAX, is not located within the Santa Monica Airport Influence Area,²⁰ is not located in the LAX Airport Influence Area,²¹ and would not result in a safety hazard for people in the project area. No impacts would occur and further analysis on this topic would not be required.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

There are no private airstrips in the project site vicinity and no safety hazard impact would occur. Further analysis is not required.

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

The project site is located in Marina del Rey, which is an unincorporated portion of the County of Los Angeles. The project site would be subject to the Operational Area Emergency Response Plan (OAERP), which is prepared by the Office of Emergency Management.²² Implementation of the proposed project would not change current evacuation routes from off the project site. Furthermore, renovation of the proposed project would not physically interfere with the OAERP. No impacts would occur and further analysis on this topic would not be required.

¹⁹ California Department of Toxic Substances, Envirostor, Hazardous Waste and Substances Site List, <http://www.envirostor.dtsc.ca.gov/public/> Accessed November 11, 2013.

²⁰ Los Angeles County Department of Regional Planning, Los Angeles County Airport Land Use Commission, Santa Monica Airport Influence Area, http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf. Accessed November 11, 2013.

²¹ Los Angeles County Department of Regional Planning, Los Angeles County Airport Land Use Commission, LAX Airport Influence Area, http://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf. Accessed November 11, 2013.

²² Los Angeles County Department of Regional Planning, Draft General Plan 20013, Safety Element, pg. 219.

h) Expose people or structures to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a Very High Fire Hazard Severity Zones (Zone 4)?

The project site is not located in a Very High Fire Hazard Severity Zone (Fire Zone 4). No further analysis is necessary.²³

ii) within a high fire hazard area with inadequate access?

The project site is not located in a high fire hazard area. The project site is located on the interior of the Palawan Way loop road and is currently developed with adequate access for firefighting equipment. During the plan check process, plans will be submitted to the Los Angeles County Fire Department for review and approval to insure sufficient access. Impacts are considered less than significant and no additional analysis is warranted.

iii) within an area with inadequate water and pressure to meet fire flow standards?

The proposed project entails the rehabilitation/renovation of the existing Mariner's Bay Apartments complex; as noted, the project does not entail development that would cause for the expansion of existing floor area or the addition of dwelling units on the site. Since its construction on the site in the early 1970s, the existing apartment complex has been adequately and continuously served with water by Los Angeles County's Marina del Rey Water System. Water pressure at the site will continue to be provided consistent with Los Angeles County Fire Department fire flow standards, as has been the case over the years of the apartment complex's operation on the subject property. Impacts are thus considered less than significant and no additional analysis is warranted.

iv) within proximity to land uses that have the potential for dangerous fire hazard?

The project site is located in the unincorporated Los Angeles County community of Marina del Rey, in the western portion of its small craft harbor. Land uses located in the vicinity of the subject property include a yacht club, boat slips and commercial and residential uses, all of which are adequately serviced by Fire Department emergency services. The Impacts are thus considered less than significant and no additional analysis is required.

i) Does the proposed use constitute a potentially dangerous fire hazard?

The project proposes rehabilitation of an existing residential apartment complex that is currently adequately serviced by Fire Department emergency services. Impacts are thus considered less than significant and no further analysis is required.

²³ Los Angeles County Department of Regional Planning, General Plan 2035, Fire Hazard Severity Zones Policy Map, <http://LA County Safety Element – Wildland and Urban Fire Hazards Map>, Accessed November 11, 2013.

10. HYDROLOGY AND WATER QUALITY

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	

Would the project:

a) Violate any water quality standards or waste discharge requirements?

The project site is currently developed with a 379-unit apartment complex. Best management practices (BMPs) would be applied during rehabilitation activities to ensure that pollutants are not introduced into the storm drain system and that pollutant discharges into the adjacent small craft harbor are minimized. With BMPs in place during rehabilitation activities, water quality standards would remain similar to the existing conditions, and the proposed project would not violate any water quality standards. The project shall comply with the California Regional Water Quality Control Board (CRWQCB) and the State National Pollutant Discharge Elimination System (NPDES) permit discharge requirements, the requirements of the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit and the County's Low Impact Development (LID) Program. The applicant may be required to submit a drainage concept to Public Works to ensure compliance with the MS4 and NPDES requirements. Compliance with the LID program includes preparation of a comprehensive LID plan that demonstrates compliance with the LID Standards Manual which is submitted for review and approval by Public Works. Impacts would be less than significant. No further analysis is required.

b) Substantially deplete groundwater supplies or 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

The project site is currently developed with a 379-unit apartment complex. There is currently no groundwater recharge on the project site and this condition will not change with the implementation of the proposed project. The project does not propose any extraction of groundwater and therefore the proposed project would not cause any impacts to groundwater resources or to groundwater recharge. No further analysis is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

The proposed project site contains an existing drainage system that is adequate in terms of capacity but that may require upgrading in regards to modern stormwater management and the County's Low Impact Development (LID) Program. LID encompasses the use of structural devices, engineered systems, vegetated natural designs, and education to distribute stormwater and urban runoff. For this reason, it is anticipated that drainage patterns and runoff quantities of the project site would remain substantially the same size as under current conditions. Runoff would continue to outlet through the storm drain system after such treatment. Project implementation would not substantially alter existing runoff and drainage conditions at the project site nor substantially increase erosion or siltation. Therefore impacts would be less than significant and no further analysis is required.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

The proposed project site contains an existing drainage system that is adequate in terms of capacity but that may require upgrading in regards to modern stormwater management and the County's Low Impact Development (LID) Program. For this reason, it is anticipated that drainage patterns and runoff quantities of the project site would remain substantially the same size as under current conditions. Runoff would continue to outlet through the storm drain system after such treatment. Project implementation would neither substantially alter existing runoff and drainage conditions at the project site nor substantially increase risk of flooding. Therefore impacts would be less than significant and no further analysis is required.

e) 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?

The project site is currently developed with a 379-unit apartment complex. The proposed project would have the same or less runoff entering the stormwater drainage system as the current site condition. The project would not cause runoff that would exceed the capacity of the stormwater system. Consequently, there would be no impact to the stormwater drainage system. Impacts are considered less than significant and no further analysis is required on this topic.

f) Generate construction or post-construction runoff that would violate applicable stormwater NPDES permits or otherwise significantly affect surface water or groundwater quality?

The project site is currently developed with a 379-unit apartment complex. The proposed rehabilitation of the existing residential structures and parking garages could introduce pollutants from construction activities into the storm water flow that empties into Marina del Rey small craft harbor. The Applicant would employ BMPs during the rehabilitation process to ensure that a minimal amount of pollutants enter into the stormwater flow from the proposed project site. The project proponent would be required to comply with the California Regional Water Quality Control Board (CRWQCB) and the State National Pollutant Discharge Elimination System (NPDES) permit discharge requirements. Impacts from construction and operational runoff would be less than significant. Further analysis of this topic is not required.

g) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84 and Title 22, Ch. 22.52)?

The proposed project site contains an existing drainage system that is adequate in terms of capacity but that may require upgrading in regards to modern stormwater management and the County's Low Impact Development (LID) Program (in the event the County determines the project to be subject its LID Ordinance). For this reason, it is anticipated that drainage patterns and runoff quantities of the project site would remain substantially the same size as under current conditions. Runoff would continue to outlet through the storm drain after such treatment. The aforementioned stormwater management improvements would not alter the existing drainage pattern of the site or area and would only be introduced to treat and retain runoff in compliance with the County's LID Program. Compliance with the LID requirements will be achieved through the implementation of the Drainage Concept, approved by Department of Public Works preceding the issuance of any project permits.

h) Result in point or nonpoint source pollutant discharges into State Water Resources Control Board-designated Areas of Special Biological Significance?

The project site is not located within an area designated as an Area of Special Biological Significance (ASBS). Therefore, the proposed project would not impact an ASBS. No further analysis is required.

i) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?

The project does not propose to use septic systems or private sewage disposal systems (on-site wastewater treatment systems). The proposed project would have no impact on surface water. No further analysis is required.

j) Otherwise substantially degrade water quality?

The project site is currently developed with a 379-unit apartment complex. Rehabilitation/renovation of the existing site improvements would not substantially degrade water quality through compliance with NPDES/MS4 and implementation of a Stormwater Pollution Prevent Plan (SWPPP). The new permit order 2009-0009DWG requires a certified Qualified SWPPP Developer (QSD) to prepare the SWPPP and a certified Qualified SWPPP Practitioner (QSP) to enforce the SWPPP. Typical construction BMPs include the following: EC-1 Scheduling, EC-2 Preservation of Existing Vegetation, EC-7 Geotextiles & Mats, SE-1 Silt Fence, SE-7 Street Sweeping and Vacuuming, SE-8 Sandbag Barrier, WE-1 Wind Erosion Control, TC-1 Stabilized Construction Entrance/Exit, TC-3 Entrance/Outlet Tire Wash, NS-1 Water Conservation Practices, NS-6 Illicit Connection/Illegal Discharge Detection and Reporting, NS-8 Vehicle and Equipment Cleaning, NS-12 Concrete Curing, WM-1 Material Delivery and Storage, WM-2 Material Use, WM-3 Stockpile Management, WM-4 Spill Prevention and Control, WM-5 Solid Waste Management, WM-6 Hazardous Waste Management, WM-8 Concrete Waste Management, and WM-9 Sanitary/Septic Waste Management. Impacts from the proposed project would be less than significant on water quality.

k) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, or within a floodway or floodplain?

The proposed project involves the rehabilitation/renovation of an existing 379-unit apartment complex. No new buildings are proposed. The applicant of the proposed project would be required to submit a drainage concept to DPW for review and approval prior to the issuance of a building permit. With submittal of this drainage concept plan and since flood protection standards that currently exist on the project site would not be changed, impacts would be less than significant. In addition, the project is not located within a floodway, floodplain, or other flood hazard area. Further analysis on this topic would not be required.

l) Place structures, which would impede or redirect flood flows, within a 100-year flood hazard area, floodway, or floodplain?

The proposed project involves the rehabilitation/renovation of an existing 379-unit apartment complex. No new buildings are proposed and the project site would remain similar to existing conditions. The project site is not located within a floodway, floodplain, or other flood hazard area and no structures would be placed within a floodway, floodplain, or other flood hazard area. Therefore, the proposed project would not impact or impeded a flood hazard area. Impacts are thus considered less than significant and further analysis on this topic would not be required.

m) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

The project site is currently developed with a 379-unit apartment complex. The project site is not located in an area having high flood potential. Impacts from the proposed project would be less than significant and no further analysis on this topic is required.

n) Place structures in areas subject to inundation by seiche, tsunami, or mudflow?

The proposed project entails the rehabilitation of existing apartment facilities that are located within the Marina del Rey Harbor, along the Southern California coastline. The potential exists for communities along low-lying areas of the Southern California coastline to experience flooding due to tsunamis caused by earthquakes or underwater landslides. The maximum expected run-up of a tsunami in the local area of the project site is 9.6 feet in a 100-year interval and 15.3 feet in a 500-year interval.²⁴ Tsunamis generated from local earthquakes may be larger than distant earthquakes but are less likely to occur. Furthermore, the proposed project has been developed with a finished pad in addition to the majority of the complex being at a street elevation of about 10 feet above mean sea level (msl), with a few areas along the northern promenade being at 8.5 feet above msl. The boat slips are at an approximate of slightly higher than 7 feet above msl. Therefore, potential for the proposed project to be inundated by a tsunami is less than significant, and further analysis on this topic is not required. A seiche could occur within the Marina but the project and the proposed project is developed about 10 feet above mean sea level. Therefore, the proposed project site is protected from a seiche occurring within the Marina, and impacts would be less than significant. Since the proposed project site is not located in an area that is subject to high mudflow conditions, there would be no impacts. Further analysis on this topic would not be required.

²⁴ County of Los Angeles, Department of Regional Planning, Marina del Rey Land Use Plan, February 8, 2012, pg. 10-5.

11. LAND USE AND PLANNING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Physically divide an established community?

The project site is located in an area of Marina del Rey that is highly urbanized. Existing residential structures, commercial structures, parking lots, and parks are located around the proposed project site. The proposed project would not divide an established community; therefore, there would be no impacts. No further analysis on this topic is required.

b) Be inconsistent with the applicable County plans for the subject property including, but not limited to, the General Plan, specific plans, local coastal plans, area plans, and community/neighborhood plans?

The subject parcel's land use designation per the Marina del Rey Land Use Plan is "Residential III-WOZ & Water." The Residential III land use designation permits medium-density residential land uses, consistent with existing development on the site. The rehabilitation of the existing residential structures and associated facilities is therefore consistent with the plan designations on the project site. Therefore, there would be not impact and no further analysis is required.

c) Be inconsistent with the County zoning ordinance as applicable to the subject property?

The proposed project is zoned as Marina del Rey Specific Plan under the Los Angeles County Zoning Ordinance. Furthermore, the subject parcel is designated Residential III-WOZ & Water in the certified LCP. The project proposes no change in land use and is consistent with the Specific Plan zoning. Therefore, there would be no impact and no additional analysis is required.

d) Conflict with Hillside Management criteria, Significant Ecological Areas conformance criteria, or other applicable land use criteria?

The project site is not located in or adjacent to a Hillside Management Area. Therefore, the proposed project would not be required to abide by the criteria of the Hillside Management Areas. The project site is not located adjacent or within an SEA. Therefore, the proposed project would not have to conform to SEA Criteria. There would be no impacts and further analysis on this topic is not required.

12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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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"/>
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The project site is not located within a Mineral Resource Zone as mapped by the County of Los Angeles.²⁵ The proposed project would not impact a known mineral resource area and no further analysis is required.

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"/>
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The project site is not located within a Mineral Resource Zone as mapped by the County of Los Angeles. However, the project site is located within an Oil and Gas Resource Zone.²⁶ The project site is developed with residential land use and does not currently contain existing drilling sites for the recovery of oil and natural gas, nor are any drilling sites located on the project site for the recovery of oil or natural gas proposed in the future. There would be no impacts to oil and natural gas resources with implementation of the proposed project. There are no recorded abandoned oil wells along Palawan Way. The proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated within the County of Los Angeles General Plan or the Marina del Rey Specific Plan. Therefore, there are no impacts and no further analysis is required.

²⁵ County of Los Angeles 2035 Draft General Plan, Figure 9.6, Natural Resource Areas. Accessed November 11, 2013.

²⁶ County of Los Angeles 2035 Draft General Plan, Figure 9.6, Natural Resource Areas. Accessed, November 11, 2013.

13. NOISE

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>			

Would the project result in:

a) Exposure of persons to, or generation of, noise levels in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Construction Noise

The County Noise Control Ordinance (County Code Section 12.08.440) identifies specific restrictions regarding construction noise. Operation of equipment used in construction, drilling, repair, alteration, or demolition work is prohibited between weekday hours of 7:00 PM to 7:00 AM and anytime on Sundays or legal holidays if such noise would create a noise disturbance across a residential or commercial real-property line.²⁷ The Noise Control Ordinance further states that the contractor shall conduct construction activities in such a manner that the maximum noise levels at affected buildings will not exceed those listed in Table 4, County of Los Angeles Construction Equipment Noise Restrictions. All mobile and stationary internal-combustion-powered equipment and machinery is required to be equipped with suitable exhaust and air-intake silencers in proper working order.

**Table 4
County of Los Angeles Construction Equipment Noise Restrictions**

Residential Structures	Single-Family Residential	Multi-Family Residential	Commercial ¹
Mobile Equipment: Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment:			
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	75 dB(A) Leq	80 dB(A) Leq	85 dB(A) Leq
Daily, 8:00 PM to 7:00 AM and all day Sunday and legal holidays	60 dB(A) Leq	64 dB(A) Leq	70 dB(A) Leq
Stationary Equipment: Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment:			
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	60 dB(A) Leq	65 dB(A) Leq	70 dB(A) Leq
Daily, 8:00 PM to 7:00 AM and all day Sunday and legal holidays	50 dB(A) Leq	55 dB(A) Leq	60 dB(A) Leq

Source: County of Los Angeles Noise Control Ordinance, County Code Section 12.08.440.

¹ Refers to residential structures within a commercial area. This standard does not apply to commercial structures.

²⁷ Noise disturbance is not defined in the Noise Control Ordinance. The County Health Officer has the authority to define and determine the extent of a noise disturbance on a case-by-case basis.

The Federal Highway Administration (FHWA) has compiled data on the noise-generating characteristics of specific types of construction equipment.²⁸ Noise levels generated by heavy equipment can range from approximately 70 A-weighted decibels (dB(A)) to noise levels in excess of 100 dB(A) when measured at a distance of 50 feet from the noise source. The noise levels diminish rapidly with distance at a rate of approximately 6.0 to 7.5 dB(A) per doubling of distance for acoustically hard and soft sites, respectively.

The types of construction equipment used would vary depending on the construction activity taking place. Building renovation would use equipment such as cranes, forklifts, generators, pneumatic tools, and welders. Surface paving would use equipment such as mixers, rollers and paving equipment. Architectural coating would use equipment such as air compressors.

*For purposes of this analysis, the noise levels that can be expected during each renovation item discussed above were modeled based on the types of equipment that would be in use during each activity. Renovation of interior areas is not expected to produce substantial noise and is therefore excluded from the following analysis. A noise level for each renovation item is shown in **Table 5, Modeled Renovation Noise Levels**. Noise calculations are provided in **Appendix 2**.*

Table 5
Modeled Renovation Noise Levels

Renovation Item	Noise Level – dB(A)	
	at 50 feet	at 650 feet
Building Façade	83	61
Exterior Common Areas	87	64
Electrical Upgrade	77	55
Roof Replacement	83	61

Source: Impact Sciences, Inc. 2013.

*In order to evaluate a worst-case scenario, the potential for renovation activities to occur on adjacent portions of the project site, resulting in noise levels higher than those shown in **Table 5** was also evaluated. For this analysis it was assumed that the renovation item generating the highest noise level (exterior common areas) could occur adjacent to the renovation item with the next highest noise level (building façade). Based on noise modeling provided in **Appendix 2**, the combined noise level of these two activities occurring simultaneously would be 84 dB(A) at 50 feet and 62 dB(A) at 650 feet, the distance to the nearest off-site sensitive receptor.*

As described above, the County of Los Angeles Noise Construction Standard indicates that construction noise cannot exceed 80 dB(A) Leq between the hours of 7:00 AM and 8:00 PM on weekdays. Noise associated with the construction equipment that will be used during this period would be reduced by the distance that the proposed project site is from off-site sensitive land uses. Since the construction equipment during these phases are not expected to exceed the standard of 80 dB(A) Leq at off-site noise-sensitive receptors, impacts at off-site sensitive receptors are expected to be less than significant.

The existing residential development on the project site is considered a noise-sensitive land use. Renovation activities on the project site could affect current residents. Occupied residences within 50 feet of renovation activities could experience noise levels as high as 84 dB(A). It is expected that renovation of the interior and exterior of residential buildings will be performed on unoccupied buildings. While renovation activities would occur primarily during daytime hours when most site residents are not present, some site residents may experience noise levels that exceed the County’s 80 dB(A) construction noise threshold. This

²⁸ US Department of Transportation, Federal Highway Administration, Roadway Noise Construction Model (RCNM), Software Version 1.1 (12/08/2008).

*would be considered a potentially significant impact; however, project mitigation measures **NOISE-1** through **NOISE-4** are being required that would reduce this potentially significant construction noise impact to a less than significant level.*

Operational Noise

The proposed project would not result in an increase in project related traffic, population, or residential units. Therefore, the proposed project would not result in an increase in existing operational noise. The average daily trips associated with the project would remain the same as the existing average daily trips. Therefore, the proposed project would not result in an incremental increase in roadway noise levels. Based on this, the operational noise associated with complete buildout and operation of the project would not result in an increase in noise levels compared to existing conditions. Therefore, operational noise impacts are considered less than significant.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Vibration

Persons working in the area surrounding the project could be exposed to ground-borne vibration or ground-borne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can achieve the audible range and be felt in buildings very close to the site. According to the Federal Transit Administration (FTA) guidelines, Transit Noise and Vibration Impact Assessment, certain types of construction equipment could generate groundborne vibration.²⁹ The frequency and intensity of a vibration event determines whether it would be considered excessive vibration. For infrequent vibration events of the type expected to occur during the proposed renovation, the threshold at which vibration is considered excessive for operations near sensitive uses is 80 VdB measured at 50 feet.

The most common source of vibration would likely be the result of trucks delivering construction equipment and materials to the project site. Loaded trucks can generate vibration levels of 0.076 peak particle velocity (PPV) (65 vibration decibels [VdB]) at 50 feet. These values do not exceed the damage criteria for even the most sensitive buildings that are extremely susceptible to vibration damage, and would be barely perceptible at a distance of 50 feet. Since the nearest vibration-sensitive uses (multi-family residential development) are located approximately 50 feet from the project site, these uses may experience infrequent perceptible vibration as trucks pass by. Such events would be infrequent, and would not be considered excessive, as defined above. Therefore, construction of the project would not result in any vibration impacts. No further analysis is required.

Operational Vibration

Operation of the apartment complex would not include any new stationary equipment that would generate ground-borne vibration that would cause an annoyance to humans or any structural damage to buildings. During operation, the project would be served by trash trucks that would collect municipal solid waste. However, these trash trucks would be similar to trash trucks that already serve the existing residential uses on the project site. Therefore, operation of the project would not result in any vibration impacts. No further analysis is required.

²⁹ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, (2006).

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from parking areas?

As previously discussed, the proposed project would not result in an increase in project related traffic, population, or residential units. Therefore, the proposed project would not result in an increase in roadway noise levels relative to existing conditions. The proposed project would not significantly alter the layout of the existing parking areas; as noted, existing garage parking areas would be restriped to provide approximately 979 parking spaces, an increase from the 944 parking spaces currently existing onsite. Furthermore, the project would not include any new stationary equipment that would generate noise. Therefore, the project would not result in a substantial permanent increase in ambient noise levels and impacts would be less than significant. No further analysis is required.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from amplified sound systems?

*Temporary or periodic increases in ambient noise levels would result from construction activity, which would be audible during construction in the surrounding the project area. Unmitigated impacts may potentially exceed the County of Los Angeles standards at the nearby Marina City Club condominiums, located approximately 650 feet to the north across Basin E (on Parcel 125) and the Capri Apartments, located approximately 680 feet to the south across Basin D (on Parcel 20). Although the increase in noise levels would be short-term in nature, the applicant would be required to implement noise reduction measures, which are included as mitigation measures **NOISE-1** through **NOISE-4**, below.*

The proposed project would not include an amplified sound system. Furthermore, the project would not include any new stationary equipment that would generate noise. Therefore, the project would not result in a substantial temporary or periodic increase in ambient noise levels from sound systems and other stationary equipment and impacts would be less than significant.

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 expose people residing or working in the project area to excessive noise levels?

The project is not located within an airport land use plan or within 2 miles of a public or public-use airport. The project would result in no impact for this criterion.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The project is not located within the vicinity of the private airstrip. The project would result in no impact for this criterion.

MITIGATION MEASURES:

In addition to compliance with the Los Angeles County Noise Ordinance (Section 12.08), mitigation measures that may reduce impacts to project site residents include the following:

NOISE-1: The applicant or construction contractor shall ensure that all construction equipment used is in proper operating condition and fitted with standard factory silencing features.

NOISE-2: In areas where construction equipment (such as generators and air compressors) is left stationary and operating for more than one day within 100 feet of residential land uses, temporary portable noise structures shall be erected.

NOISE-3: All exterior construction activity, including grading, paving, transport of material or equipment and warming-up of equipment, shall be limited to between the hours of 8:00 AM and 5:00 PM.

NOISE-4: Notice shall be posted at the project site and along the proposed truck haul route containing information on the type of project and anticipated duration of construction activity, and provide a phone number where people can register questions and complaints.

Implementation of these or similar measures will reduce on-site noise impacts to a less than significant level.

14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Induce substantial 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)?

Infrastructure such as sewage disposal, water conveyance systems, natural gas lines, and electrical lines currently exist and serve the project site. No additional infrastructure would be required with implementation of the proposed rehabilitation project. Therefore, the proposed project would not induce substantial direct or indirect growth within the community of Marina del Rey. There would be no impacts and further analysis on this topic would not be required.

b) Displace substantial numbers of existing housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?

The existing land uses on the project site include residential buildings and appurtenant facilities. A portion of the existing residential units located on the project site would be temporarily displaced during the rehabilitation activities although no affordable housing units would be displaced within the community of Marina Del Rey. The existing apartment units to be rehabilitated as part of the proposed project are all market rate units. The proposed rehab project will occur in phases, so as to minimize resident displacement, to the extent possible, while completing the rehabilitation project in an expeditious manner. Up to two of the complex's seven apartment buildings will be rehabilitated at one time. Less than significant impacts would occur because no residential housing units would be permanently lost and no further analysis on this topic is needed.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The proposed project site would displace a population currently residing in the existing apartment complex but not a substantial number of people, as the project will be constructed in five phases. However, this is a temporary displacement that does not require the construction of replacement housing. The project is not expected to permanently displace existing housing or residents. As such, the project would not result in the displacement of residents such that new replacement housing would need to be constructed. Impacts would be less than significant and further analysis on this topic would not be required.

d) Cumulatively exceed official regional or local population projections?

The proposed project is the rehabilitation of an existing residential apartment complex; there would be no change in use. No residential land use change is proposed. Therefore, implementation of the proposed project would not exceed official regional or local population projections and there would be no impacts. Additional analysis on this topic would not be required.

15. PUBLIC SERVICES

	<i>Less Than Significant</i>		
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project site is located in the urbanized area of Marina del Rey. BMPs would be standard during rehabilitation of the residential buildings and appurtenant facilities on the site to ensure that the threat for fire is reduced or does not occur on the project site. Since the proposed project would not pose any special fire problems, impacts would be less than significant. Therefore, further analysis on this topic is not required. The nearest County Fire Station (#110), located at 4433 Admiralty Way is 0.8 mile from the project site.

Sheriff protection?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project site is located in the urbanized area of Marina del Rey. The rehabilitation of the existing residential buildings and appurtenant facilities could provide opportunity for crime (pilferage of the construction equipment and materials) but not different from other construction locations within the area. Furthermore, rehabilitation of the proposed project would include on-site security in addition to the existing Los Angeles County Sheriff service provided from the Marina del Rey station. Since the proposed project would not pose any special law enforcement problems, impacts would be less than significant. Therefore, further analysis on this topic is not required. The nearest County Sheriff's Station is located at 13851 Fiji Way, which is 2.3 miles from the project site.

Schools?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is a residential land use but proposes no increase in population of apartment units. As such, project implementation would not generate net new students compared to current uses, and no additional students would attend local schools. Consequently, the proposed project would have a less than significant impact on schools and no additional analysis is necessary.

Parks?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is a residential land use but proposes no increase in population or apartment units. As such, no increase for recreation facilities is expected following project buildout. Therefore, there would be a less than significant impact to park resources and no additional analysis is necessary.

Libraries?

The proposed project would have no change to current library services as the proposed project would have the same demand as the current uses. As such, project implementation would not generate net new residents compared to current uses, and additional demand for library services would not occur. The nearest County library is located at 4533 Admiralty Way, which is 1.7 miles away from the project site.

Other public facilities?

There are no other public services in the project area that would be impacted by the proposed project because there is no proposed change in land uses or intensity of use. No impacts would occur.

16. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 type="checkbox"/>	<input checked="" type="checkbox"/>

Because the proposed project would not generate a permanent population increase within the community of Marina del Rey (as no new dwelling units are being added with the proposed rehabilitation project), there would not be a need to develop or expand additional recreational facilities around or near the project site. The existing recreational facilities in the project vicinity include Venice Beach and Marina/Mother's Beach, among others. No impacts would occur and further analysis on this topic is not required.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project includes enhancements to existing public walkways (the waterfront promenade) and small open space areas located on the site (i.e., renovation of small outdoor park areas on the site); however, given the relative small land areas involved, renovation of these public recreational spaces is not anticipated to have an adverse physical effect on the environment. Impacts are thus considered less than significant and further analysis is not required.

c) Would the project interfere with regional open space connectivity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project consists of a renovation of an existing structure and, as such, would not interfere with regional open space connectivity. No impacts would occur and no further analysis of this topic is required.

17. TRANSPORTATION/TRAFFIC

	<i>Less Than Significant</i>	<i>Less Than Significant</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Impact</i>	<i>Impact</i>

Would the project:

a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Access to the project site is currently provided via Palawan Way. Project implementation would result in a period of construction activity prior to buildout. **Figure 1, Proposed Construction Truck Routes**, identifies which streets would be used by construction trucks to reach the project site. Haul trucks would likely travel to the project site from the Interstate 10 (I-10) or State Route 90 (SR-90) Freeways via Lincoln Boulevard until heading west on Washington Boulevard before coming to Palawan Way. These routes would ensure travel distance in the surrounding residential neighborhoods is minimized and direct construction vehicles access to the neighborhood. During the construction period, truck operators should be directed by the construction manager to obey residential area speed limits, either as posted or the prima facie speed limit of 25 mph if not posted.

Construction traffic would be restricted to truck routes approved by the County Division of Building and Safety and operate from the hours of 8:00 AM to 5:00 PM. Construction staging (i.e., storage of equipment and materials) would be contained on the project site. Construction equipment would be minimal and include an on-site forklift for deliveries, and a boom lift for high reach purposes. The pieces of equipment would be delivered to the site at the beginning of each construction stage and removed when they are no longer needed. Likewise, construction materials would be delivered to the project site within a limited timeframe when needed and waste would be removed from the site on an as-needed basis. Daily required truck loads would include delivery of one 40 yard trash bin per day and two to three material supply deliveries. Portable restroom facilities would be serviced twice a week. A daily peak estimate of 35 vehicles is expected for construction workers working on the project site. Construction activity would be temporary thus impacts would be less than significant.

The project site is currently served by the Los Angeles County Metropolitan Transportation Authority (MTA) and Culver Citybus that provides alternative transportation throughout the community of Marina del Rey and into parts of the Los Angeles Metro Region. The closest bus stops from the proposed project are located on Washington Boulevard at Via Marina (Culver City) and at Palawan Way (Los Angeles County) for eastbound and at Washington Boulevard and Ocean Avenue (Culver City) and at Mindanao Way and Lincoln Boulevard (Los Angeles County) for westbound. Rehabilitation of the residential structures on the site would not interfere with alternative transportation service as provided by the MTA and Culver Citybus. Since implementation of the proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation, impacts would be less than significant. Further analysis on this topic is not required.

b) Conflict with an applicable congestion management program (CMP), including, but not limited to, level of service standards and travel demand measures, or other standards established by the CMP for designated roads or highways?

The proposed project would not increase the existing residential capacity on the project site and therefore would not add 50 or more total trips during either the weekday AM or PM peak hours, the threshold to require a detailed CMP analysis. Consequently, the project would not result in an increase in congestion on the surrounding roadway network due to increased vehicle trips; impacts would thus be less than significant and additional analysis is not necessary.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

The proposed project consists of renovation of an existing residential apartment complex. It would not change any air traffic patterns and there would be no impact. No further analysis of this topic is required.

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

The proposed project does not include changes in roadway design or incompatible uses. The project site is located on the interior of the Palawan Way mole loop road. All staging and construction activities are expected to be located on the project site. As such, no hazardous conditions are anticipated on Palawan Way due to project construction. Additionally, the project would not include an increase in intensity that would generate vehicle trips but rather include a renovation and upgrade of an existing permitted use. Consequently, the project would not result in an increase in congestion on the surrounding roadway network due to increased vehicle trips.

e) Result in inadequate emergency access?

The proposed project does not include a change to any of the existing emergency access routes. Access to the site is provided via Palawan Way, a fully improved street. The project will not impair or restrict access on Palawan Way. The project design will require fire equipment access within 150 feet of all structures. Project impacts would therefore be less than significant and no additional analysis is necessary.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The proposed project will not interfere with existing Bikeway Plan, Pedestrian Plan, Transit Oriented District development standards in the County General Plan Mobility Element. Therefore, there will be no impact from the proposed project and no additional analysis is required.

18. UTILITIES AND SERVICE SYSTEMS

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Exceed wastewater treatment requirements of either the Los Angeles or Lahontan Regional Water Quality Control Boards?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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There is no proposed increase in residential units; therefore, the proposed project would not substantially increase the amount of wastewater that is generated compared to existing conditions. The proposed project would not increase capacity problems at the Hyperion wastewater treatment plant that currently serves the project site. The Applicant is proposing to add washing machines to the individual apartment units (whereas such services are currently provided in “common area” washing machine rooms on the site), which will nominally increase wastewater generation at the site; however, the Applicant has performed sewer flow tests at local sewer manholes (under the supervisor of DPW), the results of which indicate sewer line capacity will remain adequate to serve the site with the addition of washing machines in the apartment units. As such, impacts are considered less than significant and further analysis on this topic is not required.

b) Create water or wastewater system capacity problems, or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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There is no proposed increase in residential units; therefore, the proposed project would not substantially increase the amount of sewage that is generated nor substantially increase the demand for water compared to existing conditions. The proposed project would not increase capacity problems at the Hyperion wastewater treatment plant that currently serves the project site. As such, project implementation would not materially increase existing flows to the wastewater treatment plant serving the site. As noted, the proposed project does include the installation of washing machines in each of the units. However, wastewater infrastructure for the project site (i.e., capacity of local sewer lines serving the site) will continue to be adequate with the addition of individual washing machines to the apartment units (as described above). Therefore, project impacts would be less than significant and further analysis on this topic is not required.

c) Create drainage system capacity problems, or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project site contains an existing drainage system that is adequate in terms of capacity but that may require upgrading in regards to modern stormwater management and the County’s Low Impact Development (LID) Program. For this reason it is anticipated that drainage patterns and runoff quantities of the project site would remain substantially the same size as under current conditions, that drainage system capacity problems will thus not result from the project, and that there will be no need for expansion of existing drainage facilities. Runoff would continue to outlet through the storm drain system after such treatment. Project implementation would not substantially alter existing runoff and drainage conditions at the project site nor substantially increase erosion or siltation. Impacts are thus considered less than significant and no further analysis is required.

d) Have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources, considering existing and projected water demands from other land uses?

The project site is located in a developed area of Marina del Rey that is currently served by an existing water conveyance system. Fire flows to the project site are adequate for the uses that currently exist on the project site (Parcel 28). Furthermore, the proposed project site contains fire hydrants located around the project site to provide hook-ups for the fire department in case of a fire on the project site. The proposed project would not include the addition of floors to the existing residential structures; therefore, an increase need in fire flow is not anticipated to be required to adequately serve the proposed project upon its completion. Per Los Angeles County's typical process, formal approval of fire flow rates for the project site would occur during the building permit process prior to issuance of permits. Impacts are thus considered to be less than significant and no further analysis is required.

e) Create energy utility (electricity, natural gas, propane) system capacity problems, or result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The project site currently receives electricity from the Southern California Edison Company and natural gas from the Southern California Gas Company. Infrastructure currently exists on the project site, which conveys an adequate supply of electricity and natural gas to the existing uses on the project site. Project development would not result in an increase of residential units and would not result in any appreciable intensification of use on the project site. New fixtures installed as part of the renovation would be energy efficient; therefore, the proposed project would not increase demand for electricity and natural gas compared to existing conditions. No impacts would occur and further analysis on this topic is not required.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

The proposed project would not increase intensity of the existing land uses, and therefore, would generate approximately the same amount of solid waste that is being generated under existing conditions. During project construction and rehabilitation activities, an increase in the amount of construction debris would occur; however, this increase would be temporary in nature and would be able to be accommodated by the local solid waste disposal service provided in the community of Marina del Rey. Furthermore, any debris that would be generated by the proposed project would be subject to the diversion rate. Since the proposed project would not generate significantly more solid waste upon its completion than is being generated under existing conditions and since renovation of the proposed project site would produce a minimal amount of renovation debris that can be adequately disposed of at landfill facilities serving the project site, project impacts would be less than significant; no additional analysis is required.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

The proposed project would comply with all federal, state, and local statutes regulating solid waste. There would be a less than significant impact from the proposed project on solid waste statutory compliance and no additional analysis is required.

19. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Less Than Significant</i>		
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Does the project have the potential to 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?

Based on the findings of this initial study, the proposed project would neither degrade the quality of the environment nor is the proposed project expected to eliminate important examples of the major periods of California prehistory. The proposed project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, nor threaten a plant or animal community. Some potential exists for the proposed project to impact nesting birds such as the Great Blue Heron, Black-crowned Night Heron, Double-crested Cormorant, and Great Egret, to the extent these or other avian species might happen to establish nests on the site. Mitigation measures are presented in this Initial Study that would require the applicant's strict adherence to policies of the certified LCP which appropriately mitigate impacts to nesting birds. With implementation of these mitigation measures, impacts would be reduced to a less than significant level and further analysis on this topic is not required.

b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would not disadvantage any long-term environmental goals of Los Angeles County or those identified in the Marina del Rey 2010 Conservation and Management Plan in an effort to achieve short-term environmental goals, as both goals are consistent with each other. Moreover, by incorporating state-of-the-industry Green Building standards, where feasible, the project's short-term environmental protection and sustainability components will help to fulfill the County's longer-term environmental protection and sustainability goals.

c) 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As described throughout this Initial Study, the proposed project would not increase the current land use intensity on the project site. Related projects as specified above would be involved in individual environmental review to determine the level of significance for impacts pertaining to each of their individual development. Therefore, cumulative impacts would be less than significant and the project's contribution to cumulative impacts would not be cumulatively considerable.

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

As described throughout this Initial Study, the proposed project includes the rehabilitation of an existing residential apartment complex. The proposed project would not include construction or operational activities that would cause a substantial adverse effect on human beings. Any such impacts, either direct or indirect, would be less than significant and further analysis on this topic is not required.

APPENDICES

- 1: Air Quality and Greenhouse Gas Assessment for the Mariner's Bay Rehabilitation Project in Los Angeles County, California. Impact Sciences, November 2013
- 2: Noise Assessment for the Mariner's Bay Rehabilitation Project in Los Angeles County, California. Impact Sciences, November 2013