City of Los Angeles

Department of City Planning • Major Projects & Environmental Analysis Section City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



INITIAL STUDY

CENTRAL CITY COMMUNITY PLAN AREA

Fig & 8th Project

Case Number: ENV-2016-1951-EIR; CPC-2016-1950-TDR-SPR; VTT-74197

Project Location: 734–744 S. Figueroa Street and 817 W. 8th Street, Los Angeles, CA 90017

Council District: 14, José Huizar

Project Description: The Project would include up to 436 residential units and approximately 10,043 square feet of ground floor commercial/retail/restaurant uses and 479 parking spaces. The proposed uses would be located within a new 42-story, high-rise residential tower that, in total, would comprise of approximately 503,535 square feet of total floor area. The Project would include four subterranean and three above-ground parking levels and an emergency helipad on the roof. The maximum height of the building would be 489 feet above ground level to the base of the helipad. To accommodate the new uses, the existing surface parking lot would be removed. The Project would include a number of open space areas and recreational amenities, totaling 47,857 square feet spread over four levels. The open space and recreational amenities provided by the Project would meet the required area (46,200 square feet) as set forth by the Los Angeles Municipal Code (LAMC).

The entire Project Site is zoned by the LAMC as C2-4D (Commercial, Height District No. 4) and has a Community Plan designation of Regional Center Commercial. Height District No. 4 within the C2 zone does not impose any height limit with an allowable maximum Floor Area Ratio (FAR) of 13:1. However, while Height District No. 4 permits an FAR of 13:1, the maximum permitted floor area of the Project Site is restricted by the "D" limitation, which restricts the FAR to 6:1 without a transfer of floor area (per Ordinance 164,307). An FAR of 6:1 permits a total floor area of approximately 279,276 square feet. However, pursuant to the Community Plan, an FAR of up to 13:1 is allowed with the transfer of surplus floor area obtained from a Donor Site. The Project requests approval of a Transfer of Floor Area Rights (TFAR) from a Donor Site (Los Angeles Convention Center), which would transfer 224,259 square feet to the Project Site. Approval of the TFAR would result in a 10.8:1 FAR (less than the 13:1 FAR as permitted in Height District No. 4), which would allow the under-utilized infill Project Site to accommodate the residential density and retail space called for in the Central City Community Plan.

APPLICANT:

Resource California, LLC

PREPARED BY:

Eyestone Environmental

ON BEHALF OF:

The City of Los Angeles
Department of City Planning
Major Projects & Environmental
Analysis Section

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK ROOM 615, CITY HALL LOS ANGELES. CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE			
City of Los Angeles Department of City Planning	14, José Huizar	October 28, 2016			
RESPONSIBLE AGENCIES	•				
Los Angeles Department of Building and Safety, Los Angeles Department of Water and Power, Los Angeles Department of Transportation, Los Angeles Department of Public Works					
PROJECT TITLE/NO. Fig & 8th	CASE NO. ENV-2016-1951- CPC-2016-1950-	-EIR; -TDR-SPR; VTT-74197			
PREVIOUS ACTIONS CASE NO. N/A		nanges from previous actions. ant changes from previous actions.			

PROJECT DESCRIPTION:

Resource California, LLC, the Applicant, proposes to develop a mixed-use project on a 46,546-square-foot site located within the Central City Community Plan area of the City of Los Angeles (the Project). The Project would include up to 436 residential units and approximately 10,043 square feet of ground floor commercial/ retail/restaurant uses and 479 parking spaces. The proposed uses would be located within a new 42-story, high-rise residential tower that, in total, would comprise of approximately 503,535 square feet of total floor area. The Project would include four subterranean and three above-ground parking levels and an emergency helipad on the roof, which was referred to as the 43rd story in the Entitlement Application for the Project. The maximum height of the building would be 489 feet above ground level to the base of the helipad. To accommodate the new uses, the existing surface parking lot would be removed.

The Project would include a number of open space areas and recreational amenities, totaling 47,857 square feet spread over four levels. The open space and recreational amenities provided by the Project would meet the required area (46,200 square feet) as set forth by the Los Angeles Municipal Code (LAMC). In addition, as part of the Project, along the street frontage, two rows of London plane trees and Mexican fan palms would be planted along Figueroa Street, and a row of pink trumpet trees would be planted along 8th Street. A variety of trees, including, but not limited to, maple, strawberry, bamboo, olive, pine, laurel, and orange trees, would also be planted on Levels 5, 6, and 42. Overall, approximately 166 new trees would be provided by the Project.

The entire Project Site is zoned by the LAMC as C2-4D (Commercial, Height District No. 4) and has a Community Plan designation of Regional Center Commercial. Height District No. 4 within the C2 zone does not impose any height limit with an allowable maximum Floor Area Ratio (FAR) of 13:1. However, while Height District No. 4 permits an FAR of 13:1, the maximum permitted floor area of the Project Site is restricted by the "D" limitation, which restricts the FAR to 6:1 without a transfer of floor area (per Ordinance 164,307). An FAR of 6:1 permits a total floor area of approximately 279,276 square feet. However, pursuant to the Community Plan, an FAR of up to 13:1 is allowed with the transfer of surplus floor area obtained from a Donor Site. The Project requests approval of a Transfer of Floor Area Rights (TFAR) from a Donor Site (Los Angeles Convention Center), which would transfer 224,259 square feet to the Project Site. Approval of the TFAR would result in a 10.8:1 FAR (less than the 13:1 FAR as permitted in Height District No. 4), which would allow the under-utilized infill Project Site to accommodate the residential density and retail space called for in the Community Plan.

Please refer to Attachment A for a more detailed description of the Project.

ENVIRONMENTAL SETTING:

The Project Site is located in a highly urbanized area dominated by commercial development and high density residential development. Surrounding uses in the vicinity of the Project Site include the FIGat7th shopping mall, which consists of restaurants, commercial, and retail uses immediately across Figueroa Street to the west. North of

the Project Site are a surface parking lot and a small commercial building along Figueroa Street and an office/commercial building occupying the entire northern end of the block along 7th Street. East of the Project Site is a surface parking lot that is accessible from an alley located along the eastern boundary of the Project Site and Flower Street; this parking lot is flanked on the south by a seven-story parking structure with ingress driveways on 8th Street and egress driveways on Flower Street and on the north by a five-story parking structure with ingress and egress driveways on Flower Street. To the south are an office/commercial building (at Figueroa Street) and a commercial building (at Flower Street). Beyond these land uses are other high-rise commercial buildings, including the 73-story Wilshire Grand Center, which is currently completing construction and located approximately one block to the northwest of the Project Site. High rise residential development is located one block south of the Project Site on Figueroa Street between 9th Street and Olympic Street. Other high density residential development is located in the vicinity of the Project Site on Flower Street south of 8th Street and on 9th Street east of Figueroa Street. The Project Site is located in a portion of the City subject to the Downtown Design Guide, the Greater Downtown Housing Incentive Area Ordinance, and the Los Angeles Sports and Entertainment District Streetscape Plan.

PROJECT LOCATION: 734–744 S. Fig	ueroa Street and 817 W. 8th	Street, Los A	ngeles, CA 90017
PLANNING DISTRICT Central City Community Plan Area	☐ PRELIMINARY		
EXISTING ZONING C2-4D	MAX. DENSITY ZONING Please refer to Attachmen	nt A	☑ DOES CONFORM TO PLAN
PLANNED LAND USE & ZONE Mixed-Use; C2-4D	MAX. DENSITY PLAN Please refer to Attachme	nt A	DOES NOT CONFORM TO PLAN
SURROUNDING LAND USES Commercial and Residential	PROJECT DENSITY Please refer to Attachmen	nt A	☐ NO DISTRICT PLAN
DETERMINATION (To b	e completed by Lead Agen	су)	
On the basis of this initial evaluation	:		
☐ I find that the proposed project CC DECLARATION will be prepared.	ULD NOT have a significant ef	fect on the envi	ronment, and a NEGATIVE
☐ I find that although the proposed p significant effect in this case because A MITIGATED NEGATIVE DECLARA	revisions on the project have b		
☐ I find the proposed project MAY hat REPORT is required.	ave a significant effect on the er	nvironment, and	an ENVIRONMENTAL IMPACT
☐ I find the proposed project MAY had impact on the environment, but at least applicable legal standards, and 2) had on attached sheets. An ENVIRONME remain to be addressed.	st one effect 1) has been adequates been addressed by mitigation	ately analyzed measures base	in an earlier document pursuant to ed on earlier analysis as described
☐ I find that although the proposed p significant effects (a) have been analy applicable standards, and (b) have be including revisions or mitigation meas	zed adequately in an earlier El en avoided or mitigated pursua	R or NEGATIVE int to that earlie	E DECLARATION pursuant to r EIR or NEGATIVE DECLARATION,
Jon Chan	na	Plannino	Assistant
SIGNATURE			TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

Fig & 8th

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
☐ Aesthetics		Hazards & Hazardous Materials	\boxtimes	Recreation	
☐ Agricultural and Forestry Resources		Hydrology/Water Quality	\boxtimes	Transportation/Traffic	
	\boxtimes	Land Use/Planning	\boxtimes	Tribal Cultural Resources	
☐ Biological Resources		Mineral Resources	\boxtimes	Utilities/Service Systems	
□ Cultural Resources	\boxtimes	Noise	\boxtimes	Mandatory Findings of Significance	
☐ Geology/Soils		Population/Housing			
	\boxtimes	☑ Public Services			
INITIAL STUDY CHECKLIST (To	be	completed by the Lead City Age	ncy	()	
BACKGROUND					
PROPONENT NAME Resource California, LLC				PHONE NUMBER (415) 840-2788	
PROPONENT ADDRESS 100 First Street, Suite 2350, San Francisco, CA 94105					
AGENCY REQUIRING CHECKLIST				DATE SUBMITTED	
City of Los Angeles, Department of C	City	Planning		October 28, 2016	
PROPOSAL NAME (If Applicable)					

♦					ally and less t		nt impacts
				Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	ΑE	STHETICS. Would the project:		•			-
	a.	Have a substantial adverse effect on a scenic vista	a?				
	b.	Substantially damage scenic resources, including, not limited to, trees, rock outcroppings, and histori buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?					
	C.	Substantially degrade the existing visual character quality of the site and its surroundings?	or				
	d.	Create a new source of substantial light or glare w would adversely affect day or nighttime views in the area?					
II.	de sig to As De in a de tim ag Ca reç Eo Le me ad	deriving the california And Forest Resources. In termining whether impacts to agricultural resources inificant environmental effects, lead agencies may retain the California Agricultural Land Evaluation and Site sessment Model (1997) prepared by the California epartment of Conservation as an optional model to unassessing impacts on agriculture and farmland. In termining whether impacts to forest resources, inclumberland, are significant environmental effects, lead encies may refer to information compiled by the alifornia Department of Forestry and Fire Protection garding the state's inventory of forest land, including trest and Range Assessment Project and the Forest gacy Assessment project; and forest carbon easurement methodology provided in Forest Protocologics:	efer se ding the				
	a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on to maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resource Agency, to non-agricultural use?	l				
	b.	Conflict with existing zoning for agricultural use, or Williamson Act Contract?	а				
	C.	Conflict with existing zoning for, or cause rezoning forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Publi Resources Code section 4526), or timberland zon Timberland Production (as defined by Governmen Code section 51104(g))?	c ed				

 \boxtimes

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

			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?				
III.	es Di	R QUALITY. Where available, the significance criteria tablished by the South Coast Air Quality Management strict (SCAQMD) may be relied upon to make the lowing determinations. Would the project:				
	a.	Conflict with or obstruct implementation of the South Coast Air Quality Management District (SCAQMD) Plan or Congestion Management Plan?				
	b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				
	C.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?				
	d.	Expose sensitive receptors to substantial pollutant concentrations?				
	e.	Create objectionable odors affecting a substantial number of people?				
IV.	BIC	DLOGICAL RESOURCES. Would the project:				
	a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
	b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
	C.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?				
	d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
	e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?				

			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				
٧.	CU	LTURAL RESOURCES: Would the project:				
	a.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?				
	b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?				
	C.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				
	d.	Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?				
VI.	GE	OLOGY AND SOILS. 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 fault? Refer to Division of Mines and Geology Special Publication 42.				
		ii. Strong seismic ground shaking?				
		iii. Seismic-related ground failure, including liquefaction?				
		iv. Landslides?				
	b.	Result in substantial soil erosion or the loss of topsoil?			\boxtimes	
	C.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				
	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?				
	e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				

			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	GF	REENHOUSE GAS EMISSIONS. Would the project:				
	a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
	b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				
VIII		AZARDS AND HAZARDOUS MATERIALS. Would the roject:				
	a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials				
	b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
	C.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
	d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
	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?				
	f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?				
	g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
	h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				
IX.		DROLOGY AND WATER QUALITY. Would the project sult in:				
	a.	Violate any water quality standards or waste discharge requirements?				

			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	b.	Substantially deplete groundwater supplies or interfere 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 land uses for which permits have been granted)?				
	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?				
	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 an manner which would result in flooding on- or off site?				
	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?				
	f.	Otherwise substantially degrade water quality?			\boxtimes	
	g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				
	h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?				
	i.	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?				
	j.	Inundation by seiche, tsunami, or mudflow?				\boxtimes
Χ.	LAN	ND USE AND PLANNING. Would the project:				
	a.	Physically divide an established community?				
	b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
	C.	Conflict with any applicable habitat conservation plan or natural community conservation plan?				
XI.	MIN	NERAL RESOURCES. 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?				

			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?				
XII.	. NC	OISE. Would the project result in:				
	a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
	b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?				
	C.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				
	d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				
	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?				
	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?				
XIII	l. P	OPULATION AND HOUSING. 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)?				
	b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?				
	C.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?				
XIV	su pro fac en se	rUBLIC SERVICES. Would the project result in abstantial adverse physical impacts associated with the ovision of new or physically altered governmental cilities, construction of which could cause significant avironmental impacts, in order to maintain acceptable ervice ratios, response times or other performance objectives for any of the public services:				
		Fire protection?	\boxtimes			
	b.	Police protection?	\boxtimes			
	C.	Schools?	\boxtimes			

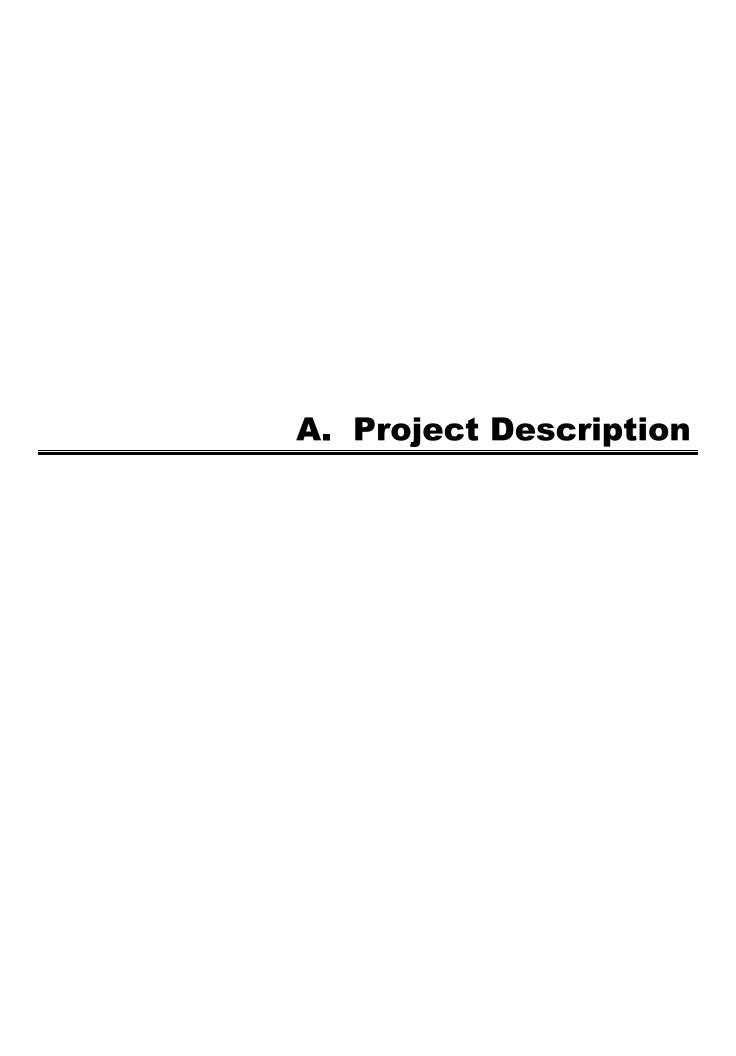
			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	-	Parks? Other public facilities?	\boxtimes			
XV.	RI	ECREATION.				
	a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
	b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				
ΧVI	. т	RANSPORTATION/TRAFFIC. 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?				
	b.	Conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				
	C.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				
	d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
	e.	Result in inadequate emergency access?	\boxtimes			
	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?				
ΧVI	I.	TRIBAL CULTURAL RESOURCES.				
	a.	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural				

value to a California Native American tribe, and that is:

			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	i.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				
	ii.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				
	UTII ojec	LITIES AND SERVICE SYSTEMS. Would the t:				
a.		ceed wastewater treatment requirements of the plicable Regional Water Quality Control Board?				
b.	wa fac	quire or result in the construction of new water or stewater treatment facilities or expansion of existing cilities, the construction of which could cause nificant environmental effects?				
C.	dra coi	quire or result in the construction of new stormwater ainage facilities or expansion of existing facilities, the instruction of which could cause significant vironmental effects?				
d.	pro	ve sufficient water supplies available to serve the oject from existing entitlements and resource, or are w or expanded entitlements needed?				
e.	pro ha: de	sult in a determination by the wastewater treatment ovider which serves or may serve the project that it is adequate capacity to serve the project's projected mand in addition to the provider's existing mmitments?				
f.	to	served by a landfill with sufficient permitted capacity accommodate the project's solid waste disposal eds?				
g.		mply with federal, state, and local statutes and gulations related to solid waste?				
XIX. N	IAN	DATORY FINDINGS OF SIGNIFICANCE.				
a.	qua hal po thr red end exa	es the project have the potential to degrade the ality of the environment, substantially reduce the bitat of fish or wildlife species, cause a fish or wildlife pulation to drop below self-sustaining levels, eaten to eliminate a plant or animal community, duce the number or restrict the range of a rare or dangered plant or animal or eliminate important amples of the major periods of California history or ehistory?				

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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).				
C.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?				

DISCUSSION OF THE	DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)					
PREPARED BY	TITLE	TELEPHONE #	DATE			
Stephanie Eyestone-Jones	President	(424) 207-5333	10/28/2016			
Eyestone Environmental						
6701 Center Drive West, Suite 900						
Los Angeles, CA 90045						



Attachment A: Project Description

1. Introduction

Resource California, LLC, the Applicant, proposes to develop a mixed-use project on a 46,546-square-foot site located within the Central City Community Plan area of the City of Los Angeles (the Project). The Project includes up to 436 residential units and approximately 10,043 square feet of ground floor commercial/retail/restaurant uses along with 479 parking spaces. The proposed uses would be located within a new 42-story, high-rise residential tower with ground floor commercial/retail/restaurant uses that would comprise of approximately 503,535 square feet of total floor area. To accommodate the new uses, the existing surface parking lot would be removed.

2. Project Location and Setting

a. Project Location

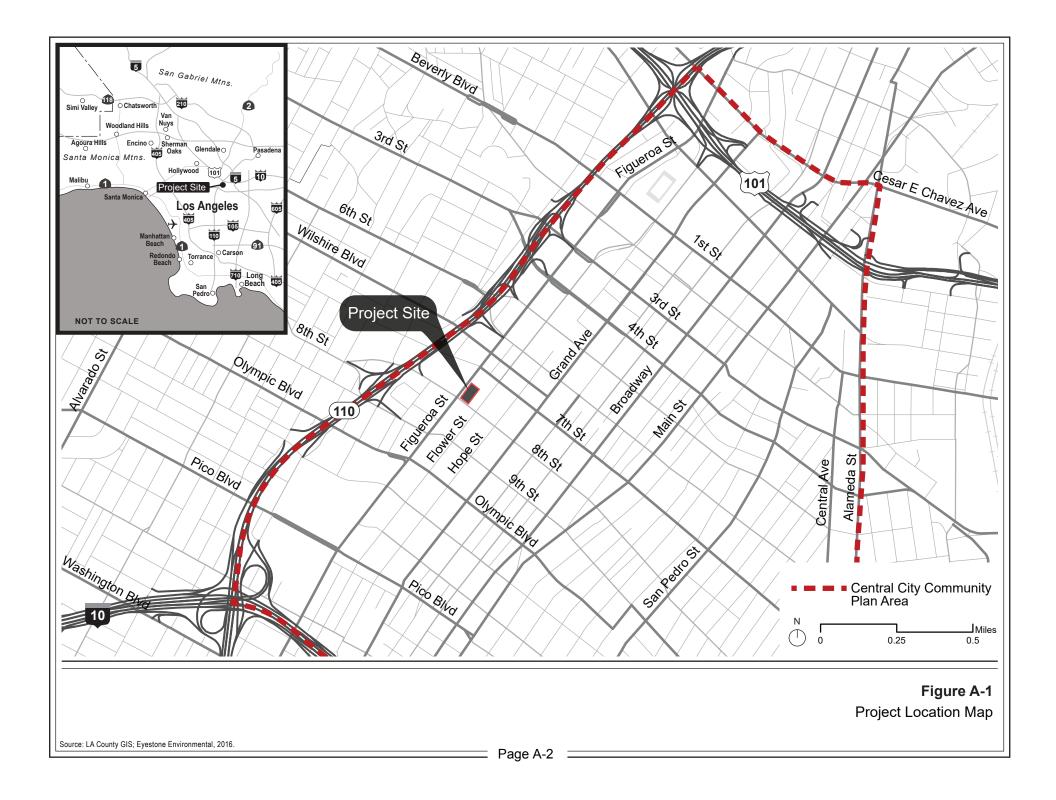
As shown in Figure A-1, Project Location Map, on page A-2, the Project Site is located in downtown Los Angeles within the Central City Community Plan area of the City of Los Angeles, approximately 14 miles east of the Pacific Ocean. Primary regional access is provided by State Route 110 (SR-110 or Harbor Freeway), which runs north-south approximately 900 feet west of the Project Site. The Project Site is specifically bounded by 8th Street to the south, Figueroa Street to the west, surface parking to the north, and a parking structure and surface parking area to the east. Major arterials providing regional access to the Project vicinity include Figueroa Street and Olympic Boulevard. In addition, the Metro 7th Street/Metro Center Station is located approximately 350 feet north of the Project Site.

b. Surrounding Uses

As shown in Figure A-2, Aerial Photograph of the Project Vicinity, on page A-3, the Project Site is located in a highly urbanized area dominated by commercial development

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The Project would also include an emergency helipad on the roof, which was referred to as the 43rd story in the Entitlement Application for the Project.



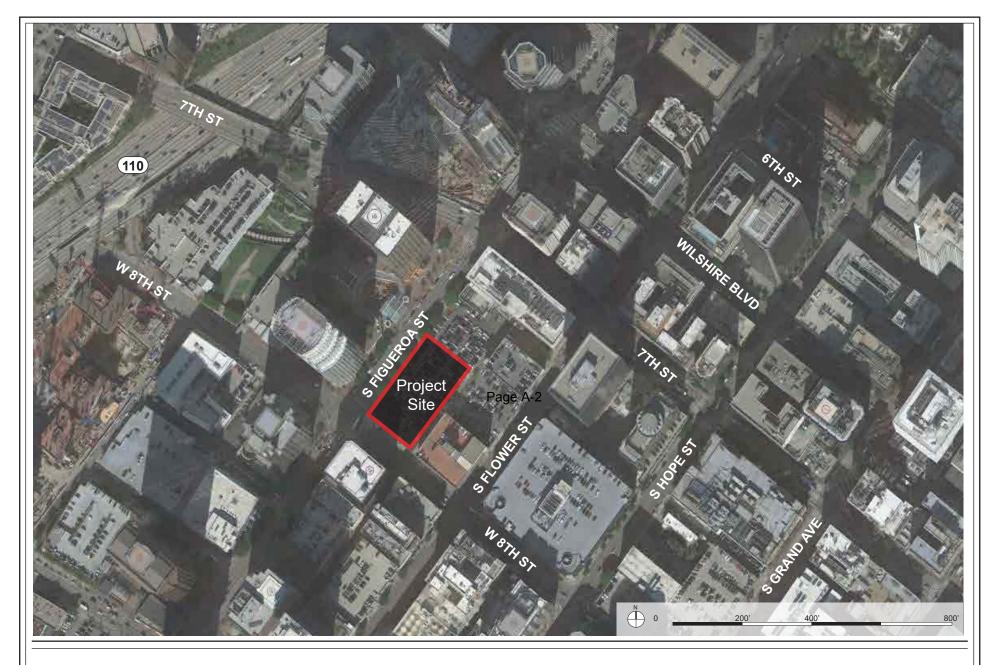


Figure A-2 Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2016; Eyestone Environmental, 2016.

and high density residential development. Surrounding uses in the vicinity of the Project Site include the FIGat7th shopping mall, which consists of restaurants, commercial, and retail uses immediately across Figueroa Street to the west. North of the Project Site are a surface parking lot and a small commercial building along Figueroa Street and an office/commercial building occupying the entire northern end of the block along 7th Street. East of the Project Site is a surface parking lot that is accessible from an alley located along the eastern boundary of the Project Site and Flower Street; this parking lot is flanked on the south by a seven-story parking structure with ingress driveways on 8th Street and egress driveways on Flower Street and on the north by a five-story parking structure with ingress and egress driveways on Flower Street. To the South are an office/commercial building (at Figueroa Street) and a commercial building (at Flower Street). Beyond these land uses are other high-rise commercial buildings, including the 73-story Wilshire Grand Center, which is currently completing construction and located approximately one block to the northwest of the Project Site. High rise residential development is located one block south of the Project Site on Figueroa Street between 9th Street and Olympic Street. Other high density residential development is located in the vicinity of the Project Site on Flower Street south of 8th Street and on 9th Street east of Figueroa Street.

c. Existing Project Site Conditions

(1) Existing Conditions

As shown in Figure A-2 on page A-3, Aerial Photograph of the Project Vicinity, the Project Site is currently developed with a surface parking lot, which is entirely paved and devoid of landscaping. This parking lot currently provides 219 standard spaces and two handicap spaces for a total of 221 parking spaces. The Project Site is bounded on two sides (Figueroa Street and 8th Street) by a wrought-iron fence; in addition, there are bollards lining the inside of the fence along Figueroa Street. Mature ficus trees also line the sidewalk along Figueroa Street.

(2) Existing Land Use and Zoning

The Project Site is located within the planning boundary of the Central City Community Plan (Community Plan), which was last updated in January 2003. Under the Community Plan, the Project Site is designated as Regional Center Commercial uses.

The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4). The Commercial zones permit a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land use permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home

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occupations. Height District No. 4 within the C2 zone does not impose any height limit with an allowable maximum Floor Area Ratio (FAR) of 13:1. However, while Height District No. 4 permits an FAR of 13:1, the maximum permitted floor area of the Project Site is restricted by the "D" limitation, which restricts the FAR to 6:1 without a transfer of floor area (per Ordinance 164,307). An FAR of 6:1 permits a total floor area of approximately 279,276 square feet.

3. Description of the Project

a. Project Overview

The Applicant proposes to develop a mixed-use project on a 46,546-square-foot site (1.15 gross acres or 1.06 net acres) located in downtown Los Angeles. As presented in Table A-1 on page A-6, the Project would provide 436 market-rate residential units and approximately 10,043 square feet of commercial/retail/restaurant uses. Additionally, the Project would provide 479 vehicle parking spaces (461 residential and 18 commercial/retail parking spaces) on seven levels, including four subterranean levels (Levels B1 through B4) and three above-ground levels (Levels 2 through 4), and 511 bicycle parking spaces (50 short-term and 461 long-term bicycle parking spaces) on two levels (Levels 1 and 2). To accommodate the Project, the existing surface parking lot, which consists of 221 parking spaces, would be removed.

As shown in Figure A-3 through Figure A-21 on pages A-7 through A-25, the Project would involve development of a 42-story high-rise mixed-use building with four subterranean levels and an emergency helipad on the rooftop.² The maximum depth of the subterranean levels would be 53 feet, and the maximum height of the building would be 489 feet above ground level to the base of the helipad.

More specifically, the ground level (Level 1) would include the lobby, trash room, bike storage, utility rooms, mail room, and a landscaped area along both Figueroa Street and 8th Street. Parking would be in four subterranean levels (Levels B1 through B4), as well as Levels 2 through 4. Level 5 would include residential amenities, including a pool, a fitness room, storage, lounge, dining area, a meeting room, and game/play rooms. Level 6 would include residential units and a deck. Residential units would be located on Levels 7 through 40. Level 41 would house the mechanical equipment incidental to the operation of the Project. Level 42 would feature a landscaped roof deck with an indoor lounge. Level 43, which is equivalent to the top of the roof of the indoor lounge, would support an

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This emergency helipad on the roof was referred to as the 43rd story in the Entitlement Application for the Project.

Table A-1 Summary of Proposed Floor Area^a

Land Use	Floor Area (sf)
Residential	493,492 sf (436 du)
Retail	10,043 sf
Total	503,535 sf

sf = square feet

du = dwelling units

Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."

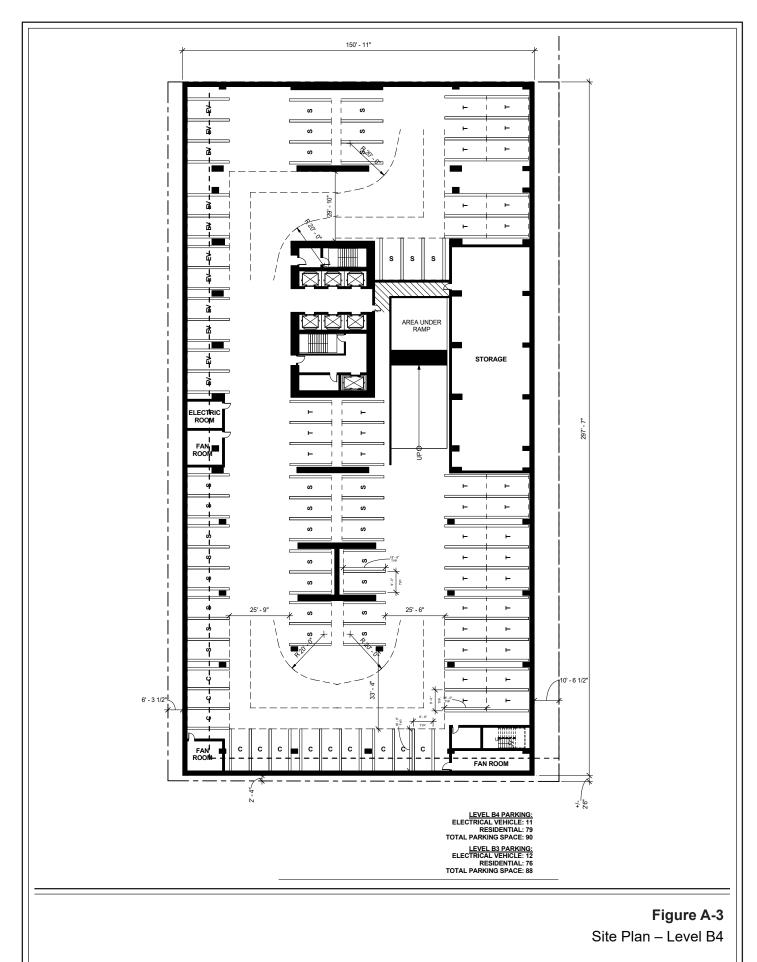
Source: Eyestone Environmental, 2016.

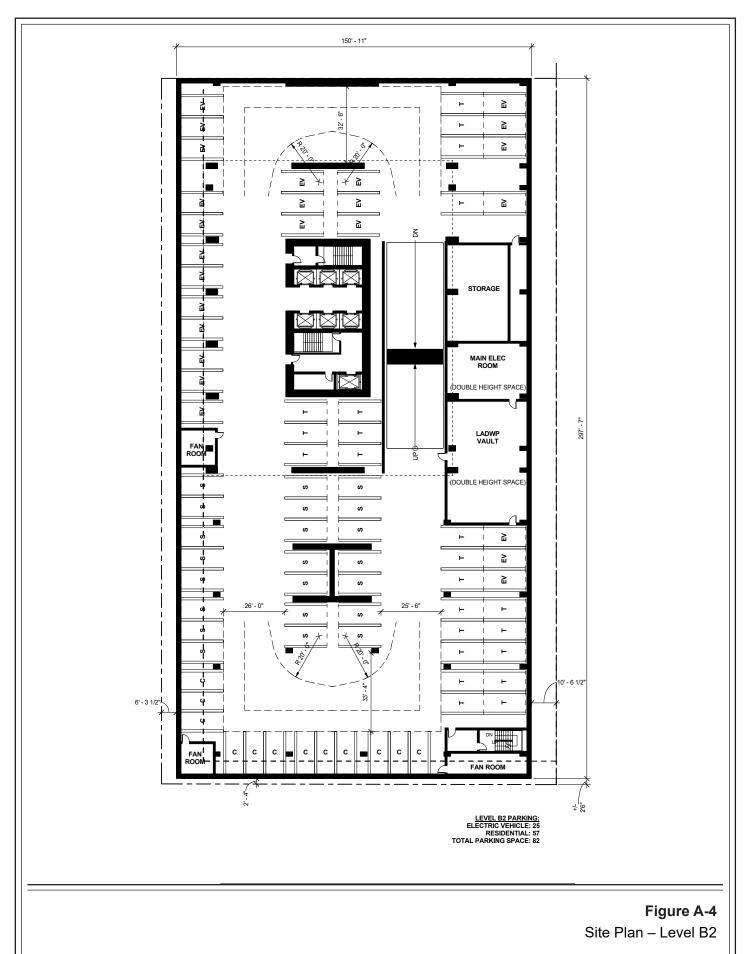
emergency helipad. Overall, the new building would comprise approximately 503,535 square feet of floor area.

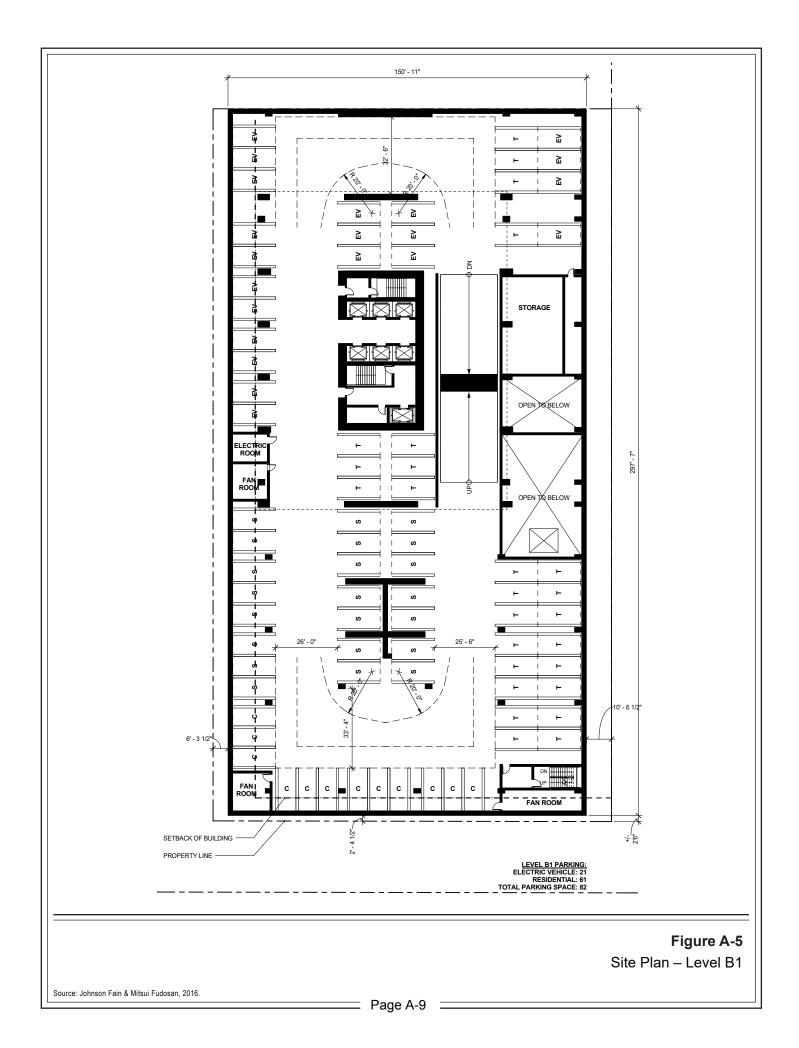
b. Building Design

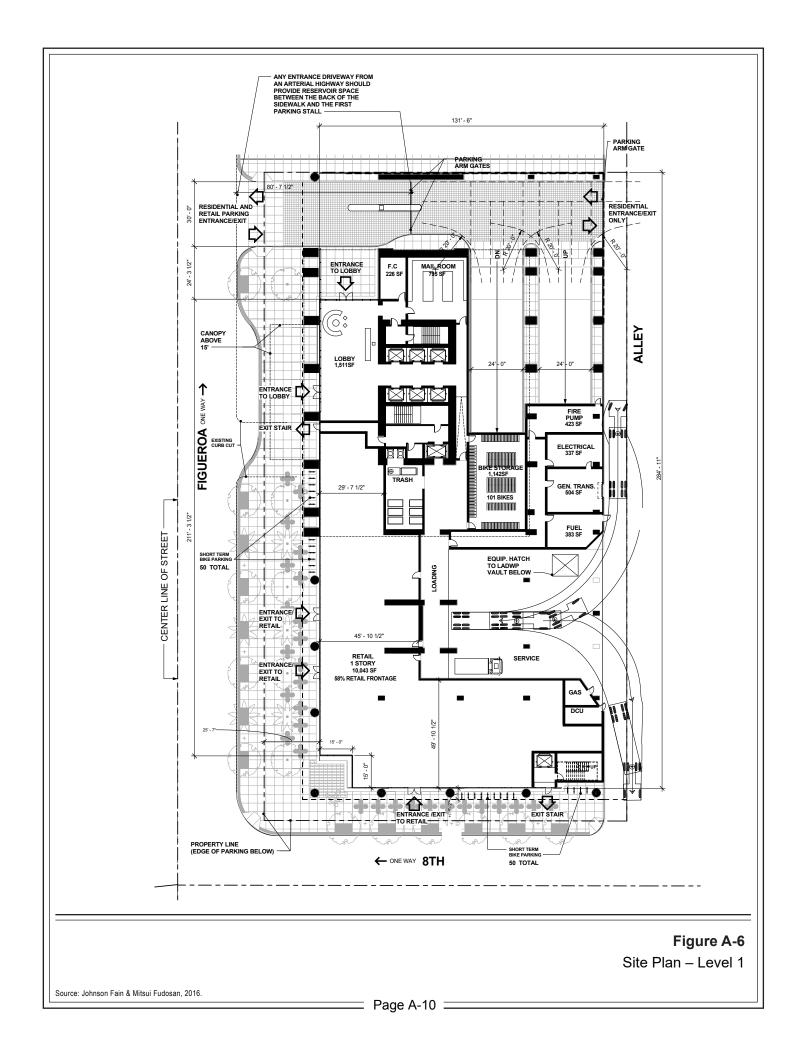
The Project would be designed in a contemporary architectural style. Building materials that are proposed to be used include different types of glass, concrete, aluminum, These varied surface materials would provide horizontal and vertical and stone. articulation that break up the building planes and reduce the visual mass of the building. Glass used in building façades would be non-reflective or treated with a non-reflective coating to minimize glare. The Project is designed to be consistent with the City's Downtown Design Guide: Urban Design Standards and Guidelines (Downtown Design Guide) and would enhance the urban appeal and walkability of the Project vicinity. Specifically, as shown in Figure A-17 through Figure A-21 on pages A-21 through A-25, the façade of the building would be articulated along all street frontages to add to the pedestrian experience. In addition, the proposed ground-level neighborhoodserving commercial/retail/restaurant uses are intended to promote pedestrian activity and further activate the streets in the surrounding area. Furthermore, the Project would provide an attractive sidewalk design that would improve pedestrian travel throughout the surrounding area.

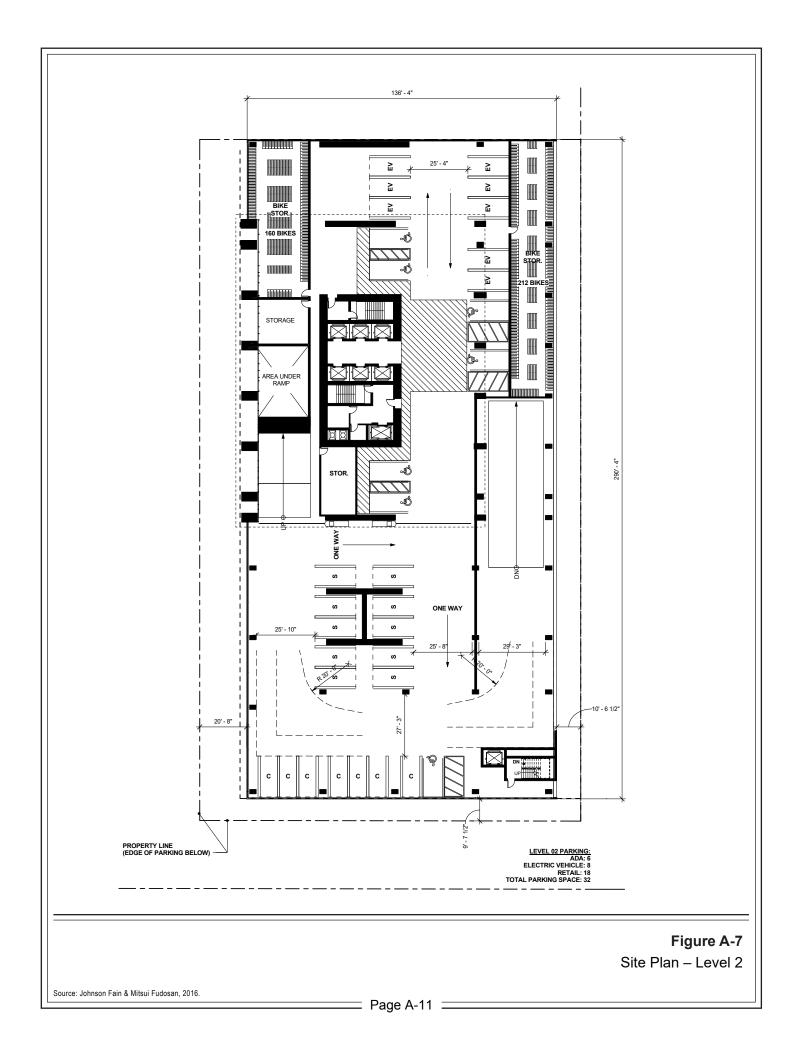
City of Los Angeles Fig & 8th

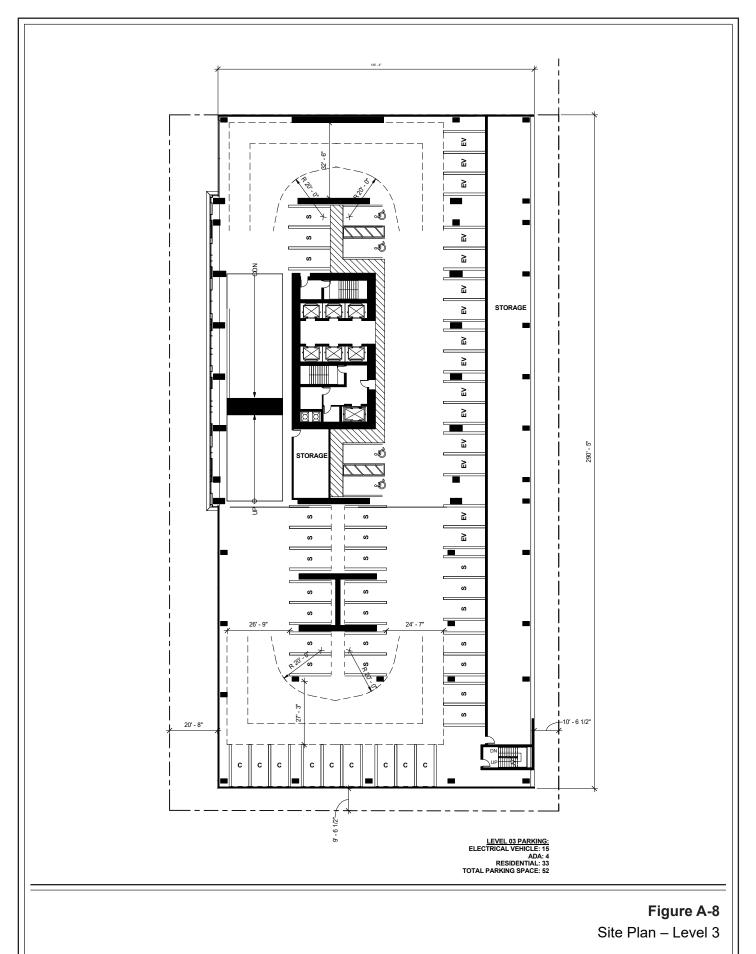


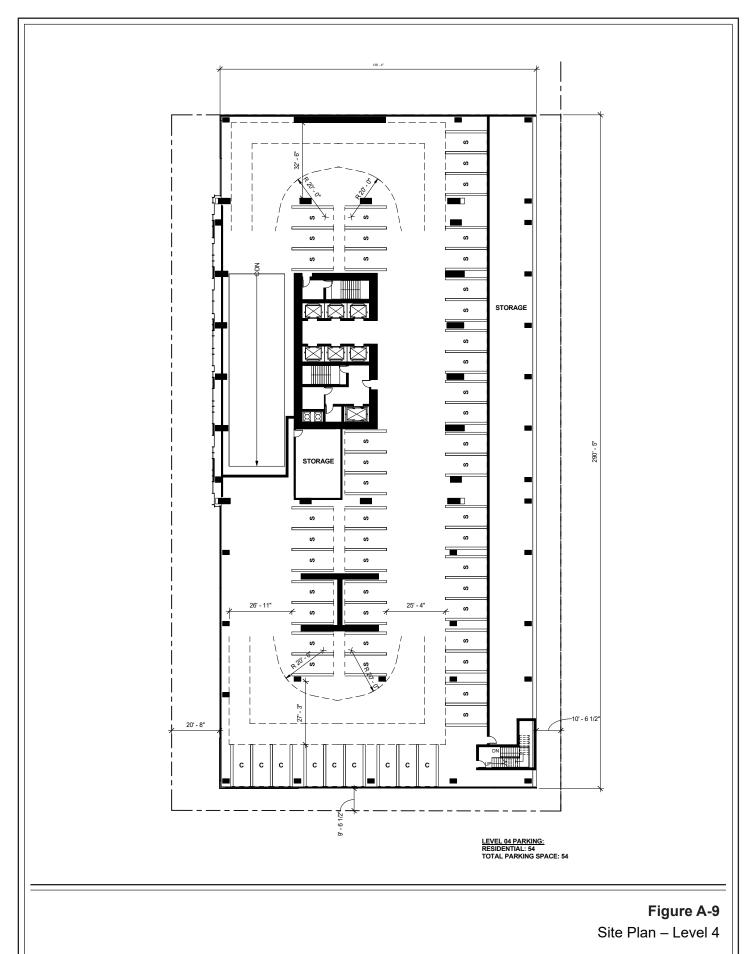


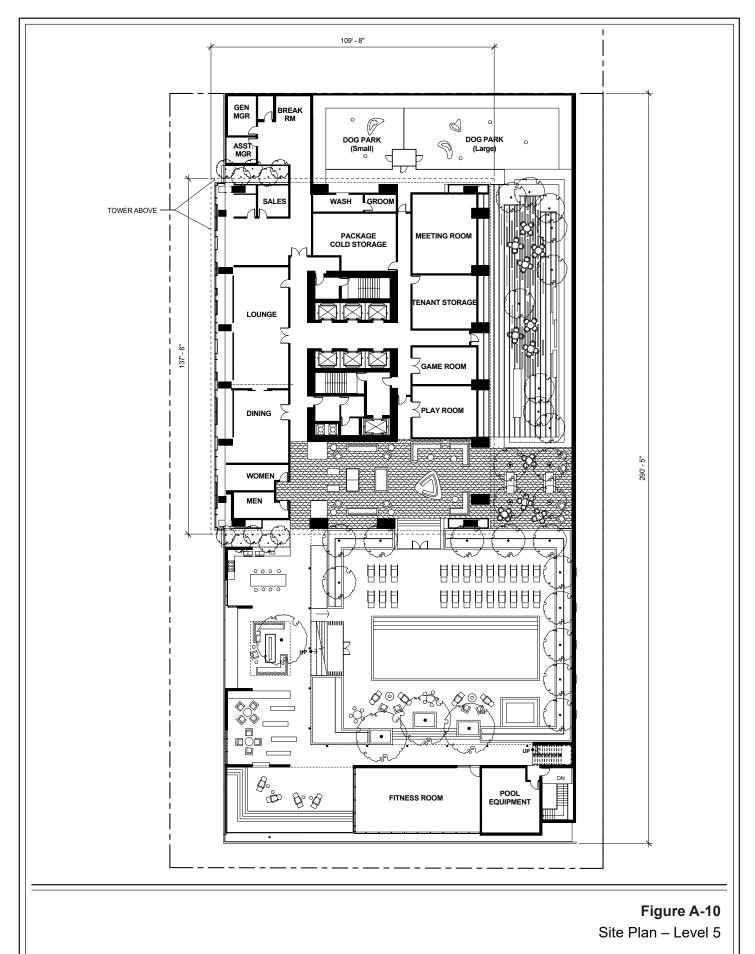












Page A-14 =

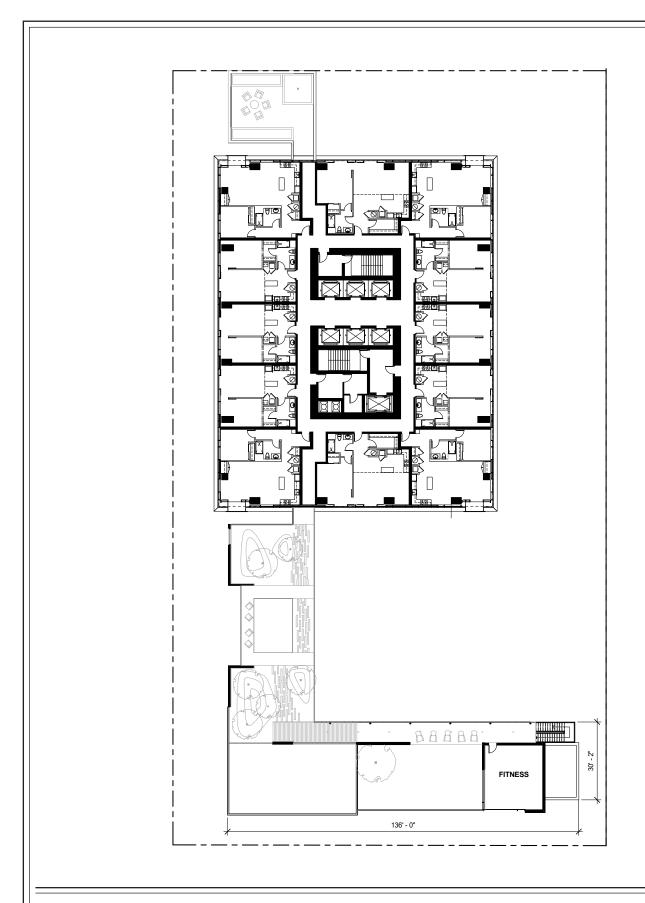


Figure A-11 Site Plan – Level 6

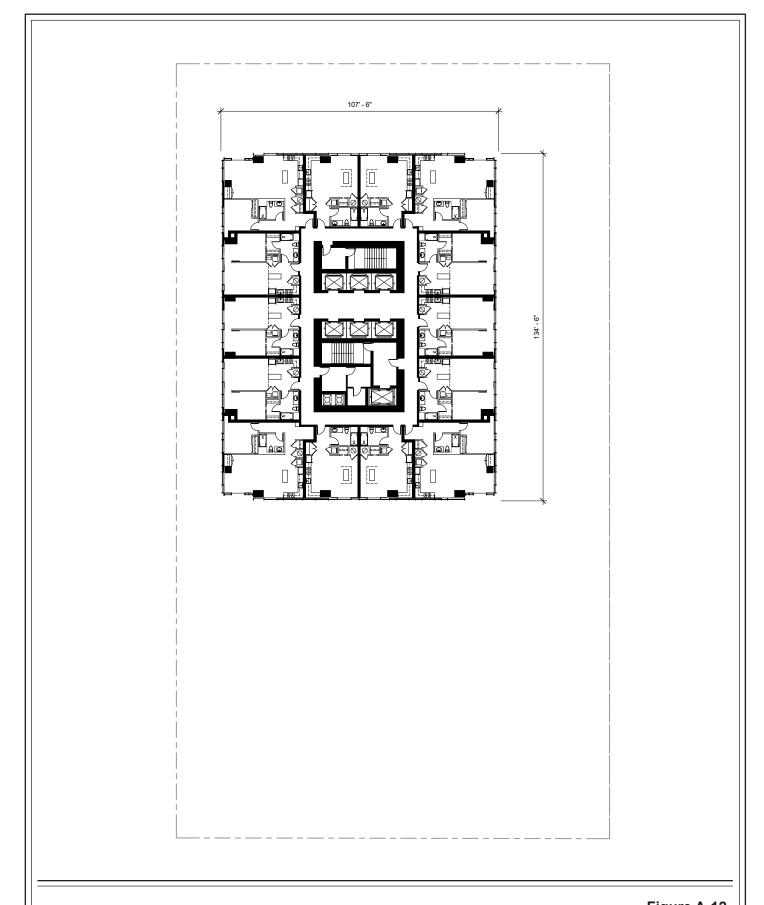


Figure A-12 Site Plan – Levels 7-21

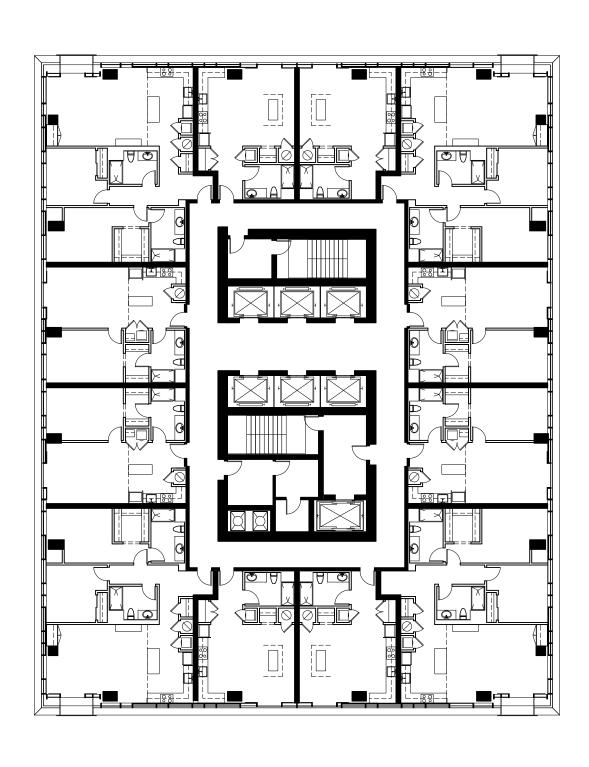


Figure A-13 Site Plan – Levels 22-33

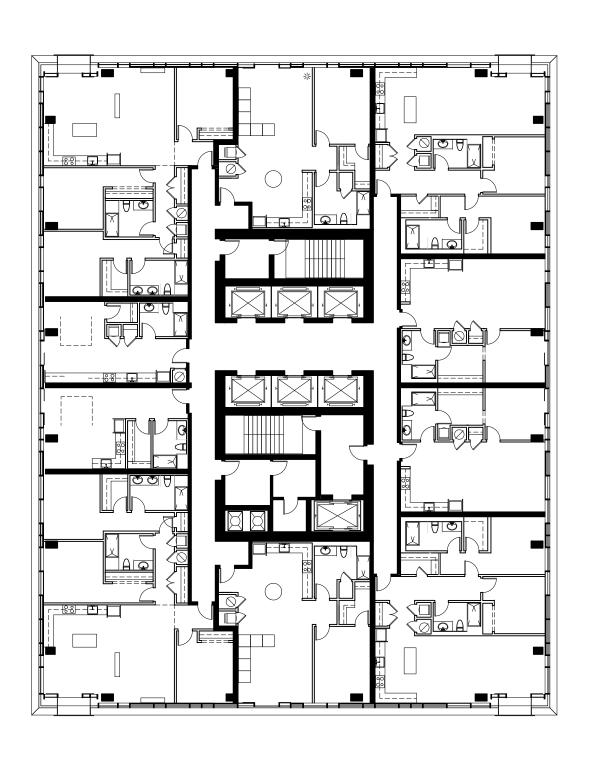


Figure A-14 Site Plan – Levels 34-40

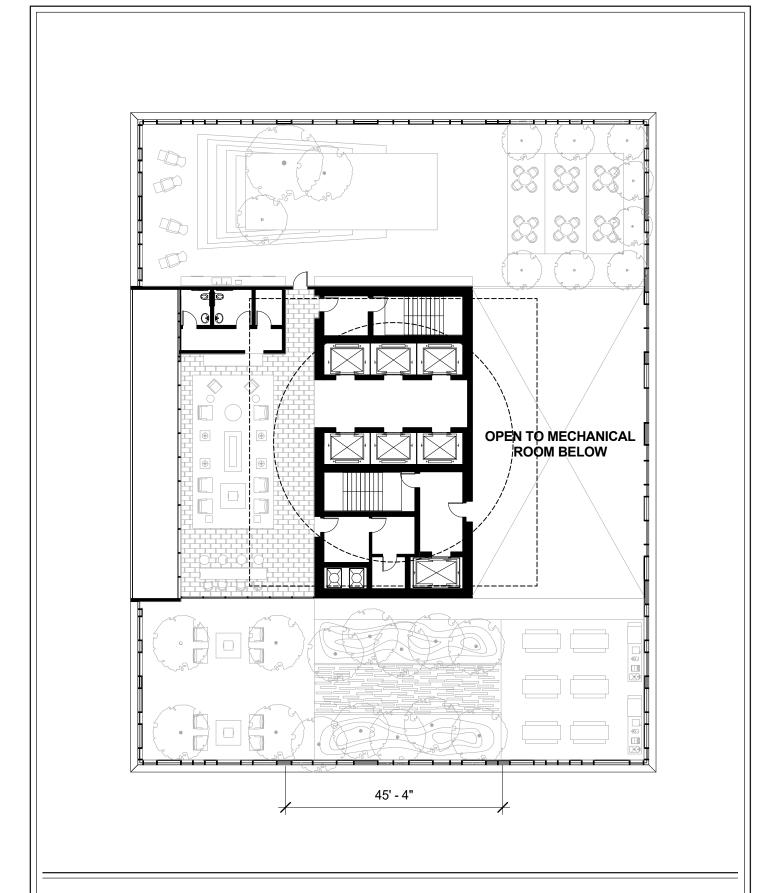


Figure A-15 Site Plan – Level 42

Source: Johnson Fain & Mitsui Fudosan, 2016.

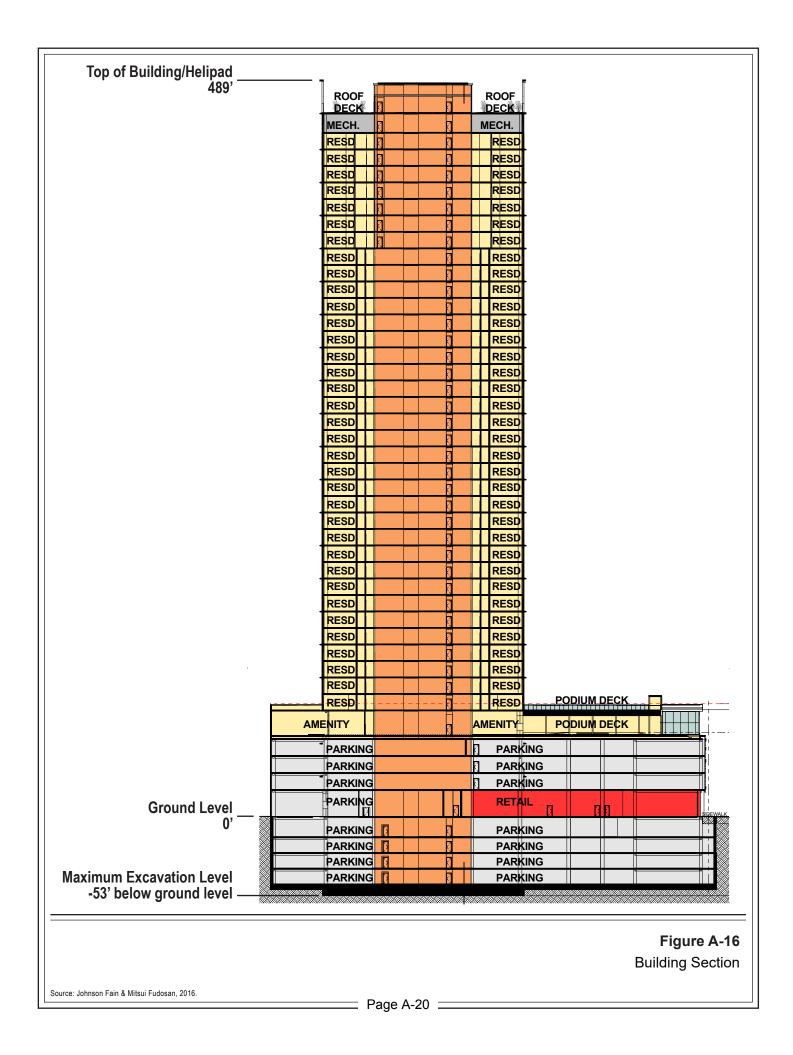
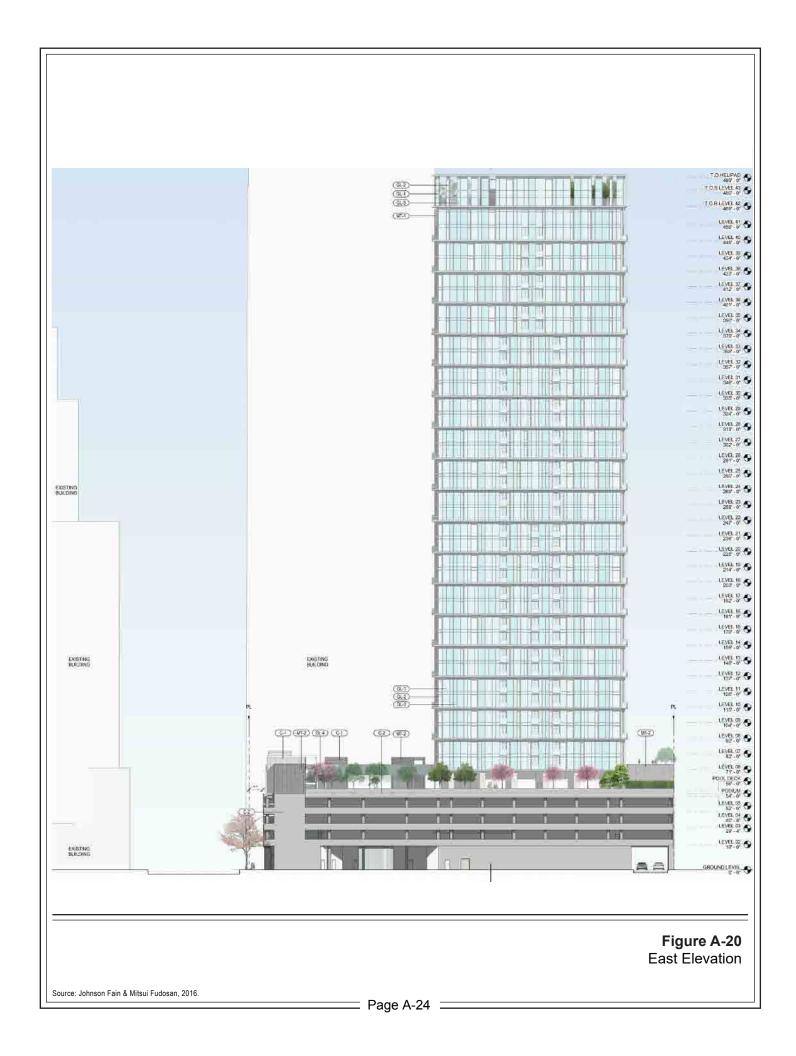




Figure A-17 Conceptual Rendering









c. Open Space and Recreational Amenities

The Project would include a number of open space areas and recreational amenities, totaling 47,857 square feet spread over four levels. The open space and recreational amenities provided by the Project would meet the required area (46,200 square feet) as set forth by the LAMC. As shown in Figure A-6 on page A-10, the ground floor (Level 1) would have 3,984 square feet of outdoor open space, consisting of landscaped areas fronting Figueroa and 8th Streets, and 1,511 square feet of indoor open space, consisting of the residential lobby area. As shown in Figure A-10 on page A-14, the outdoor area on Level 5 would comprise 19,646 square feet, including a pool with lounge/seating areas and fire pits, a dog park for both small and large dogs, and gardens with dining and seating areas; Level 5 would also comprise 10,529 square feet of indoor amenity space, including the various fitness and game rooms, children's play room, meeting rooms, and a bar/kitchen area. As shown in Figure A-11 on page A-15, the outdoor landscaped amenity deck on Level 6 would be 5,329 square feet, including an outdoor fitness area, as well as a contemplative garden and passive recreation area; Level 6 would also comprise an additional 600 square feet of indoor amenity spaces, including an indoor fitness studio. As shown in Figure A-15 on page A-19, the outdoor areas on Level 42 would comprise 7,348 square feet, including a small park with stepped seating, a garden walk, and a barbeque area; Level 42 would also comprise an additional 1,777 square feet of indoor common open space, including an indoor lounge area with bar seating and a club room.

As part of the Project along the street frontage, two rows of London plane trees and Mexican fan palms would be planted along Figueroa Street, and a row of pink trumpet trees would be planted along 8th Street. A variety of trees, including, but not limited to, maple, strawberry, bamboo, olive, pine, laurel, and orange trees, would also be planted on Levels 5, 6, and 42. Overall, approximately 166 new trees would be provided by the Project.

d. Signage and Lighting

Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Proposed signage would include mounted Project identity signage, building and commercial tenant signage, general groundlevel and wayfinding pedestrian signage, and security markings in compliance with code requirements. Commercial/retail/restaurant signage would complement the building architecture. Wayfinding signs would be located at parking garage entrances, elevator lobby, vestibules, and residential corridors. No off-premises billboard advertising is proposed as part of the Project.

City of Los Angeles Fig & 8th October 2016 Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting solutions that would minimize light trespass from the Project Site. Project lighting would follow the streetscape lighting standards as established by the Downtown Design Guide.

All new street and pedestrian lighting within the public right-of-way along the Project street frontage would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties.

e. Access, Circulation, and Public Transportation

Vehicular access to the Project's parking garage is provided near the northwestern corner of the Project site along Figueroa Street (one-way in the northbound direction) for both the commercial/retail/restaurant and residential uses and along an alley off of 8th Street (one-way in the westbound direction) for the residential uses only.

Pedestrian access to the ground floor commercial/retail/restaurant uses would be provided from both Figueroa Street and 8th Street. Project residents would access their units from a residential lobby located on Figueroa Street. The residential uses would also be accessed from all levels of the parking garage (Levels B1 through B4 and Levels 2 through 4).

The Project would also include street improvements to comply with the requirements of Mobility Plan 2035. Figueroa Street has a street designation of Avenue I, which requires a minimum roadway right-of-way width of 70 feet and sidewalk width of 15 feet. Accordingly, the Project would include a 3-foot widening and a 5-foot dedication of Figueroa Street to establish the required widths and provide a 15-foot sidewalk on the east side of the street. In addition, 8th Street has a street designation of Modified Avenue II, which requires a minimum sidewalk width of 15 feet; the Project would include a 3-foot dedication on the north side of 8th Street to establish this required sidewalk width.

There are multiple public transportation opportunities in the immediate vicinity of the Project Site. In particular, the Metro 7th Street/Metro Center Station is located approximately 350 feet north of the Project Site at the northeastern corner of Figueroa Street and 7th Street. This station is served by Metro's Red, Purple, Blue, and Expo rail lines, along with the Silver Line limited-stop bus route. Additionally, Metro, the Los Angeles

Department of Transportation (LADOT), and other transit agencies, including the Santa Monica Big Blue Bus, Foothill Transit, OC Bus, Santa Clarita Transit, Torrance Transit, and Antelope Valley Transit Authority, operate numerous bus lines with stops located in proximity to the Project Site.

f. Parking

Parking for the proposed uses would be provided in accordance with the LAMC requirements. Table A-2 on page A-29 provides a summary of proposed vehicle parking for the Project. The Project would include 479 vehicle parking spaces in total, of which 461 spaces would be designated for the residential units and 18 spaces would be designated for the commercial/retail/restaurant uses. Of the 461 spaces designated for the residential units, 92 spaces would be provided with electrical vehicle supply equipment (EVSE); no EVSE parking spaces would be provided for the commercial/retail/restaurant uses. Residential parking would be provided in Levels B1 through B4 and Levels 2 through 4, while the commercial/retail/restaurant parking would be limited to Level 2.

Table A-3 on page A-29 provides a summary of the proposed bicycle parking for the Project. As shown therein, the Project would provide a total of 511 bicycle parking spaces, 151 spaces on the ground floor and 360 spaces on Level 2. Of the 511 spaces, approximately 456 long-term and 45 short-term spaces would be provided for the residential uses, and approximately 5 long-term and 5 short-term spaces would be provided for the commercial/retail/restaurant uses. The 50 short-term spaces for both the residential and commercial/retail/restaurant uses would be provided on the ground floor along Figueroa Street and 8th Street.

g. FAR and Setbacks

While Height District No. 4 permits a Floor Area Ratio (FAR) of 13 times the buildable area of the lot (13:1 FAR), the maximum permitted floor area of the Project site is restricted by the "D" development limitation, which limits the FAR to 6 times the buildable area of the lot (6:1) without a transfer of floor area (per Ordinance 164,307). With a lot area of 46,546 square feet, an FAR of 6:1 permits a total floor area of approximately 279,276 square feet. However, pursuant to the Central City Community Plan, an FAR of up to 13:1 is allowed with the transfer of surplus floor area obtained from a Donor Site. An increased FAR would allow the under-utilized infill Project Site to accommodate the residential density and retail space called for in the Central City Community Plan.

Pursuant to Ordinance No. 181,574 and LAMC Section 14.5.6.B., a Transfer of Floor Area Rights (TFAR) allows the transfer of unused allowable floor area of a lot from a Donor Site to a Receiver Site for projects involving transfers of 50,000 square feet or greater. The

Table A-2 **Summary of Proposed Vehicle Parking**

Land Use	Number of Spaces Required ^a	Number of Spaces Proposed
Residential	456	461
Commercial	11	18
Total	467	479

Per LAMC Section 12.21.A.4(p).

Source: Craig Lawson & Co., LLC, June 2016.

Table A-3 Summary of Proposed Bicycle Parking

Land Use	Number of Spaces Required ^a	Number of Spaces Proposed
Residential—Long Term	436	456
Residential—Short Term	44	45
Commercial—Long Term	5	5
Commercial—Short Term	5	5
Total	490	511

Per LAMC Section 12.21.A.16.

Source: Eyestone Environmental, 2016.

Applicant is requesting approval of a TFAR of 224,259 square feet to the Project Site (Receiver Site) from a Donor Site, which, in this case, is the Los Angeles Convention Center at 1201 S. Figueroa Street. Approval of the TFAR would increase the total floor area of the Project to 503,535 square feet, which exceeds the base floor area ratio otherwise permitted, from 6:1 to 10.8:1 FAR (less than the 13:1 FAR as permitted in Height District No. 4). LAMC Section 14.5.9 requires that a Public Benefit Payment be provided as part of an approved Transfer Plan and shall serve a public purpose.

Per the Greater Downtown Housing Incentive Area Ordinance, LAMC Section 12.22.C.3(a), no yard requirements apply to the Project Site, except as required by the Downtown Design Guide. However, the Los Angeles Sports and Entertainment District Streetscape Plan requires that the Project provide a 9-foot private setback, which has been incorporated into the Project design. The Downtown Design Guide encourages variations in setbacks along street frontages. The Downtown Design Guide also dictates that at least 80 percent of the Project frontage be lined with building street wall at the back of the

setback and that 90 percent of that building street wall on Figueroa and 8th Streets reaches a height of 75 feet. The Project would comply with all applicable requirements set forth in the LAMC, Downtown Design Guide, and Downtown Street Standards.

h. Sustainability Features

The Project is being designed and would be constructed to incorporate environmentally sustainable design features. The sustainability features include energyefficiency measures, a pedestrian- and bicycle-friendly site design, recycling infrastructure, enhanced indoor air quality and water conservation measures. By integrating sustainability features into the design and construction of the Project, the proposed mixed-use development would include project design features (PDFs) that reduce energy and water usage and waste generation, and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure.

The following sustainability features would be incorporated in the Project:

(1) Water Conservation

- High-efficiency toilets throughout, including ultra-low flow urinals in all nonresidential restrooms as appropriate.
- Non-residential restroom faucets with a maximum flow rate of 0.5 gallon per minute and non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute. Restaurant kitchen faucets shall have pre-rinse self-closing spray heads with a maximum flow rate of 1.6 gallons per minute.
- Metering faucets in non-residential restrooms (i.e., automatically sensor-based faucets that turn off when not in use).
- Residential bathroom faucets with a maximum flow rate of 1.0 gallon per minute and kitchen faucets with a maximum flow rate of 1.5 gallons per minute. No more than one showerhead per shower stall, with a flow rate no greater than 1.75 gallons per minute.
- High-efficiency clothes washers either within individual units (with water factor of 6.0 or less) and/or in common laundry rooms (commercial washers with water factor of 7.5 or less).
- Individual metering and billing for water use of all residential uses and exploration of such metering for commercial spaces.

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- Installation of high-efficiency Energy Star-rated dishwashers in all residential units, and within kitchen/food preparation areas, at minimum, per City ordinance requirements.
- Weather-based, "smart" irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/microspray/subsurface irrigation and moisture sensors where appropriate.
- Minimum irrigation system distribution uniformity of 75 percent.
- Use of proper hydro-zoning, turf minimization, zoned irrigation and use of native/drought-tolerant plant materials.

(2) Energy Conservation and Efficiency

- High-efficiency heating, ventilation, and air conditioning (HVAC) equipment consisting of either water source heat pumps or four (4) pipe fan coil units. Operable windows would be interlocked to shut off the HVAC equipment when windows are open.
- Installation of Energy Star–labeled products and appliances where appropriate.
- Meeting or exceeding Title 24, Part 6, California Energy Code baseline standard requirements for energy efficiency, based on the 2013 Energy Efficiency Standards requirements. Examples of design methods and technologies that could be implemented may include, but not be limited to, high-performance glazing on windows, appropriately oriented shading devices, high-efficiency boilers (if single metered), instantaneous water heaters (if individual meters), and enhanced insulation to minimize solar and thermal gain.
- Application of energy-saving lighting technologies and components to reduce the project's electrical usage-profile. Examples of these components include occupancy-sensing controls (where applicable), use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies where appropriate, and exterior lighting controlled by photo sensor and/or timeclocks to ensure safety and visibility while preventing unnecessary energy usage.
- Incorporation of passive energy efficiency strategies, such as roof overhangs, porches, and inner courtyards.
- Commissioning of building energy systems to verify that the Project's building energy systems are installed, calibrated, and performing to the Owner's Project requirements.

(3) Transportation

- Provision of on-site bicycle storage for visitors and employees.
- Accessibility to multiple public transportation lines adjacent to the Project Site.
- Allocation of designated parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.
- Provision of electric vehicle charging station infrastructure in accordance with LAMC 99.04.106.4.2 requirements for multifamily dwellings (i.e., provide electric vehicle supply wiring for at least 5 percent of the total number of parking spaces). In excess of this requirement, 20 percent of the parking spaces included in the Project would provide electrical vehicle supply equipment (EVSE).

(4) Air Quality

- Provide filtered outside air supply sufficient to meet American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) 62.1 standards.
- Participation in fundamental refrigerant management to preclude the use of chlorofluorocarbons (CFCs) in HVAC systems.
- Use of adhesives, sealants, paints, finishes, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

(5) Solid Waste

- At least 50 percent of construction and demolition debris from Project construction would be diverted from landfills.
- Provide on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers.
- Use of locally sourced building materials and building materials with recycled content where applicable.

(6) Water Quality

Installation of a Low Impact Development (LID) compliant on-site stormwater treatment system, capable of treating the volume of stormwater runoff from a local 85th percentile storm event.

- Installation of pre-treatment stormwater infrastructure for the stormwater runoff tributary to the on-site stormwater treatment system.
- Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site and/or on the structure.
- During construction of the Project, best management practices (BMPs) would be implemented to control stormwater runoff and minimize pollutant loading and erosion effects.
- During operation, BMPs would be implemented to minimize pollutant loading in stormwater runoff.

(7) Construction and Design Elements

- Contractors would reference Partnership for Advancing Technology in Housing (PATH) and other current references for state-of-the-art construction methods, materials, and mechanical equipment and utilize same where applicable.
- Recycling and reuse of building and construction materials to the maximum extent feasible, including the on-site recycling and reuse of concrete removed during demolition.
- Waste diversion accounting will be utilized.

4. Project Construction and Scheduling

Construction of the Project is anticipated to commence in March 2018 with site clearance and removal of the existing surface parking lot, followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction, which is estimated to occur over a period of 30 months, is anticipated to be completed in the third quarter of 2020. The estimated depth of excavation for the subterranean parking and building foundations would be approximately 53 feet below grade. It is estimated that approximately 81,000 cubic yards of soil would be exported and hauled from the Project Site during the excavation phase. As part of the Project, a Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route Program would be subject to LADOT review and approval.

5. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project may include, but not limited to, the following:

- Transfer of Floor Area Rights (TFAR) Application for the transfer of greater than 50,000 square feet of floor area from the City of Los Angeles—owned Los Angeles Convention Center to the Project Site;
- Vesting Tentative Tract Map pursuant to LAMC Section 17.15 to create one ground lot comprising the entire site;
- Site Plan Review pursuant to LAMC Section 16.05;
- Haul route permit, as may be required;
- Construction permits, including building, grading, excavation, foundation, temporary street closures, and associated permits; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary.

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B. Explanation of Checklist Determinations

Attachment B: Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in an Environmental Impact Report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and thus do not need to be addressed further in an EIR. The questions with responses that indicate a "Potentially Significant Impact" do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR with conclusions of impact reached as part of the analysis within that future document.

I. Aesthetics

Senate Bill (SB) 743, effective January 1, 2014, amended CEQA and changed the way in which environmental impacts related to aesthetics are addressed in an EIR. Section 21099(d)(1) of the Public Resources Code (PRC) states that the "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment."

City of Los Angeles Zoning Information File ZI No. 2452 also provides that "[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

Because of the mixed-use residential character of the Project and its location within an urban TPA² (less than 0.5 mile from a major transit station), the Project qualifies for

City of Los Angeles Department of City Planning, Zoning Information File (ZI No. 2452), Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, March 2016.

² Refer to the City's ZIMAS System regarding the location of the Project Site within a Transit Priority Area. www.zimas.lacity.org, accessed September 22, 2016.

exemption under SB 743. The following discussion provides an analysis and disclosure of the potential aesthetic impacts of the Project.

Would the project:

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

Less than Significant Impact. The Project Site is located in the Central City Community of the City of Los Angeles. The Project would develop a 42-story high-rise residential tower that would include 436 residential units and approximately 10,043 square feet of ground floor commercial/retail/restaurant uses on a site that is currently occupied by a surface parking lot. A scenic vista is generally described as a panoramic view (visual access to a large geographic area) or a focal view (visual access to a particular object, scene, or feature of interest), according to the *L.A. CEQA Thresholds Guide*. The Project could be visible within scenic vistas of valued visual resources, such as the Hollywood Hills to the north of the Project Site. However, views in the vicinity of the Project Site are largely constrained by tall structures on adjacent parcels and the area's relatively flat topography. Nevertheless, further analysis will disclose the Project's potential impacts to scenic vistas.

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

No Impact. The Project Site is not located in proximity to a City-designated scenic highway. In addition, the Project Site consists predominantly of paved surfaces devoid of landscaping. Furthermore, there are no unique geologic or topographic features located on the Project Site, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. In addition, the existing surrounding commercial strip structures are not considered scenic resources. As such, no impacts associated with scenic resources within a City-designated scenic highway would occur, and no further analysis of this topic in the EIR is required.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact. A significant impact would occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site. The Project Site is located in an highly urbanized area of the City of Los Angeles and is developed with surface parking. The Project would not have the potential to substantially degrade the existing visual character or quality of the Project Site and the surrounding area. Therefore, construction of the Project would result in less than significant impacts related to this issue.

Nevertheless, further analysis will disclose the Project's potential impacts to visual character and quality.

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

Less than Significant Impact. The Project Site is located within a highly urbanized area and is largely surrounded by tall structures on adjacent parcels. The existing parking lot on the Project Site currently generates moderate levels of artificial light and glare typical of urbanized areas. Light sources include low-level security lighting, vehicle headlights, and street lighting. Glare sources include glass and metal building and vehicle surfaces. Other sources of light in the Project vicinity include pole-mounted street lights along the adjacent streets and signage and architectural lighting from nearby towers. The Project would introduce new sources of light and glare that are typically associated with residential and commercial buildings, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Illuminance and nighttime glare from the Project would be consistent with urban lighting conditions, which have relatively high light levels at the streets and sidewalks surrounding the Project Site and high light levels within the private properties for safety and security. There are no light-sensitive land uses in the Project vicinity.

Although shading is common and expected in urban areas and is considered a beneficial feature when it provides cover from excess sunlight and heat, it can have an adverse impact if it interferes with sun-related activities at sensitive uses. The Project would include a new 42-story high-rise tower that would introduce new shadows to the Project vicinity that would have the potential to shade adjacent land uses that may be sensitive to shading. Further analysis in the EIR will disclose the Project's potential impacts with regard to light, glare, and shading.

II. Agricultural and Forest Resources

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

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

No Impact. The Project Site is located in an urbanized area and is developed with surface parking. No agricultural uses or operations occur on-site. In addition, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.³ As such, the Project would not convert farmland to non-agricultural use. No impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur, and no further analysis of this topic in the EIR is required.

b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. The Project Site is not zoned for agricultural use under the Los Angeles Municipal Code (LAMC). Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are not enrolled under a Williamson Act Contract. Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts to agricultural uses or a Williamson Act Contract would occur, and no further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and does not include any forest or timberland. Further, the Project Site is currently zoned for commercial land uses and is not zoned for timberland or forest land. Therefore, the Project would not rezone forest land or timberland as defined by the Public Resources Code. No impacts to forest land or timberland would occur, and no further analysis of this topic in the EIR is required.

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³ California Department of Conservation, California Important Farmland Finder, http://maps.conservation. ca.gov/ciff/ciff.html, accessed February 18, 2016.

⁴ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 829 W 8th St/756 S Figueroa St., http://zimas.lacity.org/, accessed February 18, 2016.

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

No Impact. As mentioned above, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land. No impacts to forest land would occur, and no further analysis of this topic in the EIR is required.

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

No Impact. As described above, the Project Site is located within an urbanized area. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses. As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts to farmland would occur, and no further analysis of this topic in the EIR is required.

III. Air Quality

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

a. Conflict with or obstruct implementation of the South Coast Air Quality Management District (SCAQMD) Plan or Congestion Management Plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than ten microns in size $[PM_{10}]$, particulate matter less than 2.5 microns in size $[PM_{2.5}]$, and $lead^6$). As such, the Project would be subject to the SCAQMD's 2012 Air Quality Management Plan (AQMP). The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for

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⁵ A redesignation request to Attainment for the 24-hour PM₁₀ standard is pending with the United States Environmental Protection Agency (USEPA).

⁶ Partial Nonattainment designation for the Los Angeles County portion of the Basin only.

Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, Project development could have an adverse effect on the SCAQMD's implementation of the AQMP. Therefore, further analysis of this topic in the EIR is required to determine the Project's consistency with the SCAQMD's AQMP.

With regard to the Project's consistency with the Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (Metro), see Checklist Question XVI.b, Transportation/Circulation, below.

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

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and could also result in increased air pollutant emissions during operation (long-term). Construction-related pollutants would be associated with sources, such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, energy consumption, and other on-site activities. Construction and operation of the Project may result in the violation of air quality standards or contribute to an existing or projected air quality violation. Therefore, further analysis of this topic in the EIR is required to determine the Project's impacts related to construction and operational air pollutant emissions.

⁷ SCAG serves as the federally-designated metropolitan planning organization (MPO) for the Southern California region.

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

Potentially Significant Impact. As discussed above, Project construction and operation would emit air pollutants in the Basin, which is currently in non-attainment of federal and State air quality standards for ozone, PM₁₀, PM_{2.5}, and lead. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact when combined with other existing and future emission sources in the Project area. As such, further analysis of this topic in the EIR is required to determine the Project's potential to result in cumulatively considerable impacts from criteria pollutants.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses, which may be exposed to substantial pollutant concentrations. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential to result in exposure of sensitive receptors to substantial pollutant concentrations.

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Construction of the Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. On-site trash receptacles used by the Project would have the potential to create odors. However, as trash receptacles would be contained, located, and maintained in a manner that promotes odor control, no substantially adverse odor impacts are anticipated. Thus, impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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IV. Biological Resources

Would the project:

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is developed with a surface parking lot. The Project Site includes limited ornamental landscaping. Due to the developed nature of the Project area, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Impacts to these species would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is developed with a surface parking lot. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area. Thus, the Project would not have an effect on any riparian habitat or other sensitive natural community, and no further analysis of this topic in the EIR is required.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located in an urbanized area and is developed with a surface parking lot. No water bodies or federally protected wetlands, as defined by Section 404 of the Clean Water Act, exist on the Project Site or in the vicinity. As such, the Project would not have any effect on federally protected wetlands, and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is developed with surface parking lot. There are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity.

According to the Street Tree Report prepared for the Project and included as Appendix IS-1 of this Initial Study, there are no native or protected trees located within the Project Site or on the street sidewalk parkway. Additionally, no native trees are located on adjacent properties. Six mature ficus trees line the sidewalk along Figueroa Street. The Street Tree Report found these trees have outgrown their environment and have caused damage to the sidewalks.⁸

Although unlikely, the street trees could potentially provide nesting sites for migratory birds. In the event the street trees require removal during construction, such removal would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. In accordance with the MBTA, Project efforts would be made to schedule removal of the trees between September 1 and February 14 to avoid the nesting season. If activities were to occur during the nesting season, all suitable habitats would be thoroughly surveyed for the presence of nesting birds by a qualified biologist prior to removal. If any active nests were detected, the area will be flagged, along with a minimum 50-foot buffer (this buffer may range between 50 and 300 feet, as determined by the monitoring biologist), and would be avoided until the nesting cycle has completed or the monitoring biologist determines that the nest has failed. With compliance with this existing regulatory requirement, impacts to nesting and migratory birds would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

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The Tree Resource, Street Tree Report (8th St and Figueroa St, Los Angeles, CA 90017), May 1, 2016, p. 5.

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as "protected" by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree..." and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

As discussed above, landscaping within the Project Site is limited, and no native or protected trees are located within the Project Site. Six mature ficus trees line the sidewalk adjacent to Project Site along Figueroa Street. These trees are not a species that is protected under the City of Los Angeles Protected Tree Ordinance, and Project construction would require removal.⁹

Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the street trees would be replaced on a 2:1 basis. Furthermore, in accordance with LAMC requirements, 166 new trees would be planted within the Project Site. The new tree species would be drought-tolerant and/or climate-adapted nature and would primarily require moist to dry soil conditions. Thus, the planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. Therefore, impacts related to conflict with any local policies or ordinances protecting biological resources would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is developed with a surface parking lot with limited ornamental landscaping. As such, the Project Site does not support any habitat or natural community. Furthermore, the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to

The Tree Resource, Street Tree Report (8th St and Figueroa St, Los Angeles, CA 90017), May 1, 2016, p. 3.

the Project Site.¹⁰ Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

V. Cultural Resources

Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?¹¹

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code (PRC)); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historic resources throughout the City.

The Project Site is currently developed with a surface parking lot and does not contain any historic resource. However, immediately north of the Project Site is the Barker Brothers Building, which is a designated City Historic-Cultural Monument (HCM #356).

U.S. Fish and Wildlife Service (USFWS), Conservation Plan and Agreements Database, Region 8, http://ecos.fws.gov/conserv_plans/public.jsp, accessed February 18, 2016.

The discussion of historic resources is based on the Historical Resources Report prepared for the Project by GPA Consulting in July 2016. This report is included as Appendix IS-2 of this Initial Study.

The primary visual interaction between the Project and the Barker Brothers Building would occur at the side wall of the podium (north elevation) of the new building and the rear wall (south elevation) of the historic building, which is visible looking north from Figueroa Street and 8th Street. This south elevation is utilitarian in design and does not include any of the architectural features found on the other elevations. Windows are stacked vertically across the upper stories, and in the approximate center, it appears that an elevator shaft or staircase has been added. A driveway from Flower Street provides access to subterranean parking and loading zones. Along Figueroa Street is a three-story addition constructed in 2001. Accordingly, between the new building and historic building would be a surface parking lot approximately 106 feet wide, a driveway, loading dock, and the three-story building addition. The visibility of the Project from the historic building's primary elevation along 7th Street would be incidental as the new building would become part of the background. Therefore, the relationship between the Project and the Barker Brothers Building would be similar to the relationship between the two office towers that flank the FIGat7th shopping mall and the Barker Brothers Building. The new building would introduce a new visual element to the setting of the Barker Brothers Building; however, the setting in the Financial Core of Downtown is already characterized by modern high-rise buildings. Thus, the Project would not result in a substantial adverse change to the Barker Brothers Building or its immediate surroundings. The Barker Brothers Building would continue to possess all aspects of integrity, including setting. Accordingly, it would continue to convey its significance. As stated above, there are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Project. With respect to indirect impacts, the Project would not result in a substantial adverse change to the immediate surroundings of the historic Barker Brothers Building to the degree its eligibility as a resource would be materially impaired. The integrity of the Barker Brothers Building would not be compromised by the Project, and it would continue to be eligible for listing as historical resource defined by CEQA. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. The records search conducted for the Project Site by the South Central Coastal

Information Center (SCCIC) indicates that there is a known archaeological resource within a 0.5-mile radius of the Project Site. 12

Given the maximum depth of excavation for Project development would be approximately 53 feet below the existing ground surface, there is a possibility that archeological artifacts that were not recovered during prior construction or other human activity may be present. Consequently, in the event any archaeological materials are unexpectedly encountered during construction, work in the area would cease and deposits would be required to comply with the regulatory standards set forth in Section 21083.2 of the PRC and Section 15064.5(c) of the CEQA Guidelines, including a determination of whether any such potential unique archaeological resource would be preserved in place or left in an undisturbed state. Therefore, as compliance with the regulatory standards in Section 21083.2 and Section 15064.5(c) would ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading and excavation activities, the Project's impact on archaeological resources would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would result in excavations on the Project Site up to 53 feet, which is deeper than have occurred for prior construction, and, as such, the possibility exists that deeper-lying paleontological artifacts that were not recovered during prior construction or other human activity may be present. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. While the uncovering

The records search is included as Appendix IS-3 of this Initial Study.

of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with State law, including Section 15064.5 of the CEQA Guidelines, Section 5097.98 of the PRC and Section 7050.5 of the California Health and Safety Code. Specifically, if human remains are encountered, work on the portion of the Project Site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department and the County Coroner would be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Project's impact on human remains would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

VI. Geology and Soils¹³

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 fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The Geology and Soils discussion is based on the Geotechnical Engineering Investigation prepared by Geotechnologies, Inc. in March 2016. unless otherwise noted. This report is included as Appendix IS-4 of this Initial Study.

The CGS establishes regulatory zones around active faults, called Alquist–Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist–Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. Additionally, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on the Geologic and Soils Report and a review of the City of Los Angeles General Plan Safety Element, the Project Site is not within a currently established Alquist—Priolo Earthquake Fault Zone for surface fault rupture hazards. In addition, the Project Site is not located within a City-designated Fault Rupture Study Area. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The closest active faults are the Hollywood Fault, which is located approximately 4 miles north of the Project Site and the Newport-Inglewood Fault, located approximately 4 miles southwest of the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low, and as such, impacts would be less than significant. No mitigation measures would be required, and no further analysis of this topic in the EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As previously stated, the closest active faults are the Hollywood Fault and Newport-Inglewood Fault, both located approximately 4 miles from the Project Site. However, the Project would be designed and constructed in accordance with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, as well as the California Building Code. The California Building Code contains regulations that govern the construction of buildings in

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State of California, California Geological Survey, Hollywood Quadrangle Updated November 6, 2014, http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_ EZRIM.pdf, accessed April 8, 2016.

Los Angeles General Plan Safety Element, Exhibit A, Alquist–Priolo Special Study Zones & Fault Rupture Study Areas, p. 47 (November 1996).

State of California, California Geological Survey, Hollywood Quadrangle Updated November 6, 2014, http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_ EZRIM.pdf, accessed July 18, 2016.

California so structures can withstand minor earthquakes without damage and major earthquakes without collapse. Additionally, the Project will be constructed according to the recommendations of a design level geotechnical investigation for the Project. For these reasons, impacts with respect to strong seismic ground shaking would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction involves a sudden loss in strength of saturated, cohesionless soils that are subject to ground vibration and results in temporary transformation of the soil to a fluid mass. If the liquefying layer is near the surface, the effects are much like that of quicksand for any structure located on it. If the layer is deeper in the subsurface, it may provide a sliding surface for the material above it. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine- to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

Neither the State of California nor the City of Los Angeles mapped the Project Site in a liquefaction zone^{17,18}, and the City's Zoning Information and Map Access System (ZIMAS)¹⁹ indicates that the Project Site is not located in an area that has been identified by the State as being potentially susceptible to liquefaction. This determination is based on groundwater depth, soil type, and distance to a fault capable of producing a substantial earthquake. Additionally, the Geotechnical Investigation found that based on the dense nature of the underlying soils and depth to groundwater, the potential for liquefaction at the Project Site is considered to be remote. Therefore, no impacts related to liquefaction would occur, and no further analysis of this topic is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed

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California Geological Survey. Earthquake Zones of Required Investigation, Hollywood Quadrangle, released November 6, 2014, http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf, accessed July 18, 2016.

Los Angeles General Plan Safety Element, Exhibit B, Areas Susceptible to Liquefaction, p. 49 (November 1996).

¹⁹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report., http://zimas.lacity.org/, accessed April 8, 2016.

and characterized by relatively flat topography with minimally sloping terrain. In addition, based on the State of California Seismic Hazards Map, Hollywood Quadrangle, the Project Site is not located in a landslide area as mapped by the State or the City of Los Angeles. Furthermore, the development of the Project does not propose substantial alteration to the existing topography. Therefore, no impacts related to landslides would occur, and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, Project construction would comply with the Los Angeles Building Code, which requires necessary permits, plans, plan checks, and inspections to ensure that the Project would reduce the sedimentation and erosion effects. In addition, as discussed below under Checklist Question IX, Hydrology and Water Quality, the Project would be required to have an erosion control plan approved by the City of Los Angeles Department of Building and Safety (LADBS), as well as a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, Best Management Practices (BMPs) would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. In addition, Project construction contractors would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. With compliance with regulatory requirements that include the implementation of BMPs, impacts related to soil erosion would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR 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

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California Geological Survey. Earthquake Zones of Required Investigation, Hollywood Quadrangle, released November 6, 2014, http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf, accessed July 18, 2016.

Los Angeles General Plan Safety Element, Exhibit C, Landslide Inventory & Hillside Areas, p. 51 (November 1996).

²² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report., http://zimas.lacity.org/, accessed February 18, 2016.

on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. As discussed above, while the Project Site is susceptible to ground shaking, it is not considered susceptible to liquefaction or landslides. Three to five feet of existing fill material were encountered during exploration at the Project Site as part of the Geotechnical Investigation. This material is considered unsuitable for building support. However, due to excavation depths of up to 53 feet, this soil would be removed. Additionally, due to the uniform nature of the underlying materials, excessive seismically-induced settlement or compaction are not expected to occur. There are no slopes or free-face earth retaining walls near the Project Site, and, as such, lateral spreading is unlikely. Therefore, impacts related to unstable soils would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The on-site geologic materials are in the very low expansion range. With adherence to State and City building requirements, along with the design level geotechnical report, impacts related to expansive soils would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project's wastewater demand would be accommodated via connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems and would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to the use of septic tanks would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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Geotechnologies, Inc., Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 732–756 South Figueroa Street, Los Angeles, California, March 7, 2016.

VII. Greenhouse Gas Emissions

Would the project:

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHG), since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates Earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHG emissions in California. Activities associated with the Project, including construction and operational activities, would generate GHG emissions. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts related to GHG emissions.

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

Potentially Significant Impact. As the Project would have the potential to emit GHG emissions, further analysis of this topic in the EIR is required to identify Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG (e.g., Assembly Bill 32, City of Los Angeles Green Building Code).

VIII. Hazards and Hazardous Materials

Would the project:

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

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential and commercial uses. Specifically, operation of the commercial uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. The proposed residential uses would involve the limited use of household cleaning solvents and pesticides for landscaping. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials

would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced to a less than significant level through compliance with these standards and Therefore, impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is 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 into the environment?

Less Than Significant Impact. The Project Site has been developed as a parking lot since 1977 and had previously been used for residential and hotel uses. No current or past use, treatment, storage, disposal, or generation of hazardous substances were identified on the Project Site as part of the Phase I Environmental Site Assessment and Phase II Screening Subsurface Assessment, and no evidence of aboveground or underground storage tanks or containers of hazardous or unidentified substances were Additionally, no evidence of polychlorinated biphenyls (PCBs), asbestos containing materials (ACMs), or lead based paint (LBP) was identified on site. Furthermore, no evidence of soil or groundwater contamination that would suggest a vapor encroachment condition was noted. A search of oil field maps published by the State of California Division of Oil, Gas, and Geothermal Resources during the Environmental Site Assessment also indicated no oil production occurred on the Project Site.²⁵

Soil gas sampling was also conducted at the Project Site. Benzene levels between 11 micrograms per liter (µg/L) and 29 µg/L were detected in eight of the eleven soil gas samples collected in December 2015 at depths of 5 to 15 feet. All, but one, of the soil gas samples detected concentrations of benzene that are below the screening level for commercial properties of 0.28 µg/L; one sample detected a concentration of 0.29 µg/L. However, these concentrations are all above the screening level for residential properties of 0.085 µg/L.²⁶ The presence of benzene is attributed to the property's long-term use as a commercial parking lot. Tetrachloroethene (PCE) was detected in one location; however, the level was below all acceptable thresholds. The PCE is likely due to an off-site release

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California Environmental, Environmental Site Assessment—Phase I and Screening Subsurface Assessment—Phase II, June 2016, and Terra-Petra Environmental Engineering, Summary Report for Methane Soil Gas Investigation, 8th and Figueroa St, Los Angeles, CA, March 2, 2016, included as Appendix IS-5 of this Initial Study, respectively.

Ibid.

Email correspondence, Charles I. Buckley, PG. Re: 8th and Fig-Updated Geotech Report, June 20, 2016, as included in Appendix IS-4 of this Initial Study.

and due to its localization and low concentration is not considered to be a concern for the Project Site. Due to the depth of excavation associated with the Project (53 feet), the contaminated soil would be removed during construction. The soil would be handled, transported, and disposed of in accordance with all applicable rules and regulations. Therefore, impacts related to the release of hazardous materials into the environment would be less than significant, and no mitigation measures would be required.

Methane gas sampling was also conducted at the Project Site in February 2016. Elevated methane levels were found in all samples, with combustible levels detected in two samples. Soil gas pressures were non-existent. City Ordinance 175790 sets minimum requirements for methane intrusion control in the City of Los Angeles. However, these requirements do not apply to the Project Site as it is not located in a designated methane or methane buffer zone. Nevertheless, given that combustible levels of methane gas were detected, a Methane Mitigation System, designed to Department of Building and Safety standards is recommended for the Project Site and would be included in the Project's design.

In summary, the Phase I investigation revealed no evidence of recognized environmental conditions, historical recognized environmental conditions, or controlled recognized environmental conditions in connection with the Project Site. Additionally, a Methane Mitigation System would be included in the Project's design. Therefore, development of the Project Site would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts related to the release of hazardous materials into the environment would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. There are no school sites located within a 0.25-mile radius of the Project Site. John H. Liechty Middle School is located approximately 0.63 mile northwest of the Project Site at 650 S Union Avenue. In addition, Esperanza Elementary School is located approximately 0.75 mile northwest of the Project Site at 680 Little Street. As discussed above, construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, Project operation would involve the limited use of hazardous materials typically used in the maintenance of office and retail uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with

applicable federal, State, and local regulations. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, impacts related to hazards to nearby schools would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The Project Site is not identified on the standard environmental government lists researched as part of the Phase I, including those compiled pursuant to Government Code Section 65962.5.27 One hundred ten (110) sites within 0.25 mile are listed on various governmental database including leaking underground storage tanks (LUST), RCRA sites, and former dry cleaners. The nearest listed site of concern is a former dry cleaner location across 8th Street, approximately 100 feet southwest of the Project Site. However, the dry cleaning facility is no longer in existence, and the site has been redeveloped with restaurant and retail uses. contaminated site is a LUST cleanup site approximately 640 feet west-southwest of the Project Site. A gasoline leak was reported at this site on October 19, 1993, and the case was closed by the Regional Water Quality Control Board (RWQCB) on March 4, 1996. Due to its distance and direction of groundwater flow, the LUST site is unlikely to affect the Project Site. As discussed, the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, impacts related to creating a hazard to the public or the environment would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. Therefore, no impacts related to airport use would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

California Environmental, Environmental Site Assessment—Phase I and Screening Subsurface Assessment—Phase II, June 2016, included as Appendix IS-5 of this Initial Study.

The Project includes construction of an emergency helipad on the roof of the building. As it is not a public facility, potential impacts with regard to aviation safety associated with this helipad are discussed below in Response to Checklist Question VIII.f.

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

Less Than Significant Impact. The Project Site is not located within 2 miles of a private airstrip. There are no private airstrips within the Central City Community Plan. The closest private airstrip is the Los Alamitos Army Airfield, which is approximately 21 miles southeast of the Project Site. However, the Project includes construction of an emergency helipad on the roof of the building at a height of approximately 489 feet. Design of the helipad would be subject to the requirements of LADBS and the City of Los Angeles Fire Department (LAFD). Adherence to all design requirements and review and approval by LADBS and LAFD would ensure design and construction of the helipad would not pose a threat to the public. Therefore, impacts related to the construction of the helipad would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, Figueroa Street, adjacent to the Project Site, is a designated disaster route. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than

²⁸ Los Angeles General Plan Safety Element, Exhibit H, Critical Facilities and Lifeline Systems, p. 61 (November 1996).

significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project Site is located within Fire District No. 1, which is an area of the City wherein additional developmental regulations are required to be implemented to address fire hazards. Additional developmental regulations under Fire District No. 1 include adding a roof covering; building with walls, floors, roofs, and supporting structural members that have a minimum of one-hour fire-resistance-rated constructions; and other provisions detailed in Volume 2, Chapter 72, Section 7204 of the Los Angeles Building Code. However, there are no wildlands located adjacent to the Project Site. In addition, ZIMAS³⁰ indicates that the Project Site is not located in a Very High Fire Hazard Severity Zone. Furthermore, the Project Site is located in an urbanized area and would be developed with new structures that would comply with LAFD requirements. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impacts related to wildland fires would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

IX. Hydrology and Water Quality

The following analysis is based, in part, on the *Hydrology Technical Memo* (Hydrology Memo) prepared for the Project by KPFF, July 18, 2016. This report is included in Appendix IS-6.

Would the project:

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

Less Than Significant Impact. During Project construction, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal

²⁹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 829 W 8th St/756 S Figueroa St., http://zimas.lacity.org/, accessed February 18, 2016. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

³⁰ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 829 W 8th St/756 S Figueroa St., http://zimas.lacity.org/, accessed February 18, 2016.

storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, Project-related construction activities could have the potential to result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the requirements of the permit, a SWPPP would be developed and implemented during Project construction. The SWPPP would outline BMPs and other erosion control measures to minimize the discharge of pollutants in storm water runoff. The SWPPP would be carried out in compliance with State Water Resources Control Board (SWRCB) requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. Additionally, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the SWRCB to comply with the Construction General Permit. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

During operation, the Project would introduce sources of potential stormwater pollution that are typical of residential and commercial developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking and circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, in accordance with NPDES Municipal Permit requirements, the Project would be required to implement Standard Urban Stormwater Mitigation Plan (SUSMP) requirements during the operational life of the Project to reduce the discharge of polluted runoff from the Project Site. The Project would also be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. To this end, BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. Based on the geotechnical investigation prepared for the Project, infiltration is considered infeasible due to the on-site soils and stormwater capture and reuse is The Hydrology Memo concluded that the proposed landscaping would be sufficient to accommodate a capture and reuse system. This system would include a pretreatment device to filter out trash and debris before water is used to irrigate landscaped areas of the site. With implementation of the required BMPs, impacts to water quality

during operation would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

b. Substantially deplete groundwater supplies or interfere 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 land uses for which permits have been granted)?

No Impact. According to the California Geological survey , the historic high groundwater level beneath the site was greater than 70 feet below the existing ground surface.³¹ However, soil borings were drilled to a maximum of 150 feet below the ground surface, and ground water was not encountered during this investigation.³² Grading would consist of excavation to a maximum of 53 feet below the existing ground surface. Therefore, it is not anticipated that Project construction would require dewatering or other withdrawals of groundwater. Project construction would not deplete groundwater supplies or interfere with groundwater recharge.

In addition, operation of the Project would not interfere with groundwater recharge. The Project Site is located in an urbanized area and is developed with surface parking and devoid of landscaping. The Project Site is entirely impervious; therefore, the degree to which surface water infiltration and groundwater recharge occurs on-site is negligible or non-existent. The Project would include the addition of landscaped areas throughout the Project Site (e.g., on the podium deck and roof deck), which would not affect the amount of impervious ground surface area on-site. As such, construction and operation of the Project would not affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, no impacts on groundwater would occur, and no further analysis of this topic in the EIR 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?

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Geotechnologies, Inc., Geotechnical Engineering Investigation, Proposed Mixed Use Development, 732–756 South Figueroa Street, Los Angeles, California, March 8, 2016, as included in Appendix IS-4.

³² Ibid.

Less Than Significant Impact. The Project Site is composed entirely of surface parking devoid of landscaping and is entirely impervious. The Project Site is not crossed by any water courses or rivers. Stormwater runoff from the Project Site is conveyed by sheet flow to gutters in the adjacent streets. The Project Site is relatively flat, draining in the southerly direction across the existing surface parking lots. Stormwater runoff from the Project Site would be collected internally through the new on-site private storm drain system and connect to existing County drainage facilities along Figueroa and 8th Streets. The on-site storm drain system would consist of area drains and planter areas where stormwater is collected and treated on-site. Treated and overflow stormwater would then be discharged via a curb drain in the adjacent streets. The proposed landscaped areas throughout the Project Site would improve and reduce stormwater runoff and further reduce peak flows.

The Los Angeles County Department of Public Works (LACDPW) Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. While the Project Site is entirely impervious under existing conditions and would remain so under post-development conditions, the Project would increase the amount of landscaped areas on the Project Site, which would reduce the percentage of stormwater runoff from the Project Site. The slight reduction in stormwater runoff due to Project landscaping would slightly reduce peak flow rates during a 50-year storm event. Thus, the Project would not increase the stormwater flows from the Project Additionally, during operation, the Project would implement BMPs to ensure compliance with SUSMP and LID requirements, as discussed above. A Final Plan Check as part of the permit process with LADBS would also ensure that there is adequate storm drain capacity available for the Project. The Applicant would be responsible for providing necessary infrastructure to serve the Project if it is determined to be necessary during the normal permit process. Thus, the Project would not alter the existing drainage pattern of the site or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR 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?

Less Than Significant Impact. See Checklist Question IX.c, Hydrology and Water Quality, above.

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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?

Less Than Significant Impact. See Checklist Questions IX.a and IX.c, Hydrology and Water Quality, above.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. See Checklist Question IX.a, Hydrology and Water Quality, above.

g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles. ^{33,34} According to FEMA, the Project Site is located within Zone X (Other Areas). Zone X (Other Areas) refers to areas determined to be outside of the 0.2 percent annual chance floodplain. Thus, the Project would not place housing within a 100-year flood plain. Therefore, no impacts related to flooding would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain area. Thus, the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. Therefore, no impacts related to flooding would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

i. 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?

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Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1620F, September 26, 2008, accessed February 18, 2016.

Los Angeles General Plan Safety Element, Exhibit F, 100-Year & 500-Year Flood Plain, p. 57 (November 1996).

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin or within a dam inundation area.³⁵ Accordingly, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would not occur. Therefore, no impacts related to flooding as a result of a levee or dam failure would occur, and no further analysis of this topic in the EIR is required.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semienclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is approximately 14 miles east of the Pacific Ocean. The Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. In addition, the Project Site is not positioned downslope from an area of potential mudflow. The nearest reservoir is the Silver Lake Reservoir located approximately 3 miles north of the Project Site. This reservoir is a concrete-lined, off-stream reservoir, which is not held by a dam. Therefore, no seiche, tsunami, or mudflow events are expected to impact the Project Site. No impacts related to inundation by seiche, tsunami, or mudflow would occur, and no further analysis of this topic in the EIR is required.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located in a highly urbanized area. Surrounding uses in the vicinity of the Project Site include the FIGat7th shopping mall, which consists of restaurants, commercial, and retail uses immediately across Figueroa Street to the west. North of the Project Site are a surface parking lot and a

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Los Angeles General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59 (November 1996).

³⁶ Ibid.

small commercial building along Figueroa Street and an office/commercial building occupying the entire northern end of the block along 7th Street. East of the Project site is a surface parking lot that is accessible from the alley and 8th Street; this parking lot is flanked on the south by a seven-story parking structure with driveways on Flower Street and 8th Street and on the north by a five-story parking structure with driveways on Flower Street. To the South are an office/commercial building (at Figueroa Street) and a commercial building (at Flower Street). Beyond these land uses are other high-rise commercial buildings and skyscrapers, including the 73-story Wilshire Grand Center that is currently under construction. The majority of the Central City Community consists of commercial and industrial uses, with smaller pockets of multi-family residential, open space, and public facilities.

The Project would replace the existing surface parking lot with a new mixed-use project comprised of 436 residential units and 10,043 feet of commercial uses. The proposed uses are consistent with types of land uses already present or under construction in the surrounding area. In addition, all proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As discussed in Attachment A, Project Description, the Project requests several discretionary approvals, including a Transfer of Floor Area Rights (TFAR) for the transfer of greater than 50,000 square feet of floor area from the Los Angeles Convention Center to the Project Site, a Vesting Tentative Tract Map to create one ground lot comprising the entire site and multiple above and/or below grade airspace lots, a site plan review, a haul route permit, construction permits, and other discretionary and ministerial permits and approvals that may be deemed necessary. Accordingly, further analysis of this topic in the EIR is required to determine the Project's consistency with the LAMC and other applicable land use plans, policies, and regulations.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is developed with surface parking. As such, the Project Site does not support any habitat or natural community. Additionally, as noted above in Response to Checklist Question IV.f, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts related to any conservation plans would occur, and no further analysis of this topic in the EIR is required.

XI. Mineral Resources

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?

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone, where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impacts related to mineral resources would occur, and no further analysis of this topic in the EIR 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?

No Impact. See Checklist Question XI.a, Mineral Resources, above.

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³⁷ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

Los Angeles General Plan Safety Element, Exhibit E, Oil Field & Oil Drilling Areas, p. 55 (November 1996).

XII. Noise

Would the project result in:

a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise. The predominant source of noise in the Project area is associated with traffic from roadways. Existing on-site noise sources primarily include vehicle noises associated with the parking lot. During Project construction activities, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. Additionally, operation of the Project's commercial and residential uses would introduce sources of noise to the Project vicinity. Additionally, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways, which may result in the exposure of persons to or generation of noise in level in excess of established standards. Therefore, further analysis of this topic in the EIR is required to determine the Project's noise impacts during construction and operation.

b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration in association with demolition, site grading and clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further analysis of this topic in the EIR is required to determine the Project's groundborne vibration and noise levels during construction and operation.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As described above, project-related traffic and operation of the residential and commercial uses have the potential to increase ambient noise levels above existing levels. Therefore, further analysis of this topic in the EIR is required.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As discussed above in Checklist Questions XII.a and XII.b, Noise, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further analysis of this topic in the EIR is required to determine the Project's noise impacts during construction and operation.

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?

No Impact. The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. Therefore, no impacts related to airport noise would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. The Project Site is not located within the vicinity of a private airstrip. There are no private airstrips within the Central City Community Plan. The closest private airstrip is the Los Alamitos Army Airfield, which is approximately 21 miles southeast of the Project Site. However, the Project includes development of a helipad on the roof of the proposed building. This helipad would be for emergency use only. Any additional noise associated with emergency use of the helipad would be rare and temporary. Therefore, impacts related to the use of an emergency helipad would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

XIII. Population and Housing

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)?

Less Than Significant Impact. The Project would result in the construction of 436 new residential dwelling units. As such, the Project would increase the residential population of the City of Los Angeles. As discussed above in Checklist Question III(a), Air Quality, SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG has prepared the 2016-2040 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through The growth projections in the 2016–2040 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG's planning area. The Project Site is located in SCAG's City of Los Angeles Subregion. According to SCAG's 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2016 is approximately 3,954,629 persons.⁴⁰ In 2020, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,063,757 persons.41 According to the City of Los Angeles Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.44 persons per unit.⁴² Applying this factor, development of 436 units would result in a net increase of approximately 1,064 residents. The estimated 1,064 net new residents generated by the Project would represent approximately 0.97 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2016 and 2020. Therefore, the Project's residents would be well within SCAG's population projection for the City of Los Angeles Subregion.

According to the 2016–2040 RTP/SCS, the forecasted housing supply for the City of Los Angeles Subregion in 2016 is approximately 1,377,614 households.⁴³ In 2020, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,429,729 households.⁴⁴ Thus, the Project's 436 new residential units would constitute up to approximately 0.84 percent of the housing growth forecasted between 2016 and 2020. Therefore, the Project's housing units would be well within

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Based on a linear interpolation of 2012–2040 data.

⁴¹ Ibid

Per conservation with Matthew Glesne of the City of Los Angeles Department of City Planning, November 6, 2014. Based on the 2012 Census American Community Survey (ACS) data, the persons per household for multi-family units was calculated by looking at "units in structure" and "total population in occupied housing units by units in structure."

Based on a linear interpolation of 2012–2040 data. SCAG forecasts "households," not housing units. As defined by the U. S. Census Bureau, "households" are equivalent to occupied housing units.

⁴⁴ Based on a linear interpolation of 2012–2040 data.

SCAG's housing projection for the Subregion. As emphasized in many regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new dwelling units to serve both the current population and the projected population. By developing 436 new residential dwelling units, the Project would help to fulfill this demand.

With regard to employment, the Project's 10,043 square feet of commercial uses would generate approximately 27 employees based on employee generation rates developed by the Los Angeles Unified School District (LAUSD). In addition, approximately three employees are estimated for the operation of the tower (i.e., leasing management and maintenance staff). According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2016 is approximately 1,763,929 employees. In 2020, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,831,457 employees. Thus, the Project's estimated 27 employees would constitute approximately 0.04 percent of the employment growth forecasted between 2016 and 2020. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial population or housing growth. Impacts related to population and housing would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required. With regard to cumulative population and housing impacts, please see Checklist Question XVIII.b, below.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the Project would not displace any existing housing. Therefore, no impacts related to displacement of housing would occur, and no further analysis of this topic in the EIR is required.

Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Based on the employee generation rate for "Neighborhood Shopping Center" land uses, which is 0.00271 employee per average square foot.

⁴⁶ Based on a linear interpolation of 2012–2040 data.

⁴⁷ Ibid.

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

No Impact. As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. Therefore, no impacts related to population displacement would occur, and no further analysis of this topic in the EIR is required.

XIV. Public Services

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

a. Fire protection?

Potentially Significant Impact. As discussed above, development of 436 residential units would generate approximately 1,064 residents. Thus, the Project has the potential to result in an increased demand for fire protection services. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on fire protection services provided by the LAFD.

b. Police protection?

Potentially Significant Impact. The 1,064 residents generated by the Project may result in an increased demand for police protection services provided by the Los Angeles Police Department (LAPD). Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on police protection services provided by the LAPD.

c. Schools?

Potentially Significant Impact. The 1,064 residents generated by the Project may result in an increased demand for LAUSD school facilities. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on school services and facilities provided by the LAUSD.

d. Parks?

Potentially Significant Impact. The residential population generated by the Project may result in additional demand for parks and recreational services provided by the Los Angeles Department of Recreation and Parks (LADRP). Therefore, further analysis of this

topic in the EIR is required to determine the Project's potential impacts on parks and recreational facilities provided by the LADRP.

e. Other public facilities?

Potentially Significant Impact. The residential population generated by the Project may result in additional demand for library services provided by the Los Angeles Public Library (LAPL). Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on library services provided by the LAPL.

No other public services would be notably impacted by the Project. Therefore, the Project would have no impacts on other public facilities. No further analysis of other public facilities in the EIR is required.

XV. Recreation

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?

Potentially Significant Impact. As discussed above in Checklist Question XIV.d, Public Services, the new residents associated with the Project could result in an increased demand for the existing public parks and recreational facilities that serve the Project Site. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on parks and recreational facilities provided by the LADRP.

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

Potentially Significant Impact. The Project would include a number of open space areas and recreational amenities, totaling 50,962 square feet spread over four levels. The facilities would include a pool, dog park, outdoor lounges and fire pits, a bar and kitchen area, a game room, a dining garden area, and a club room. The potential environmental impacts of constructing these facilities are analyzed throughout this Initial Study and will be further analyzed in the EIR for those topics where impacts could be potentially significant as part of the overall Project.

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XVI. Transportation/Circulation

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?

Potentially Significant Impact. The Project proposes development that has the potential to result in an increase in daily and peak hour traffic within the Project vicinity. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees and visitors would generate daily vehicle, pedestrian, bicycle, and public transit trips. The resulting increase in the use of the area's transportation facilities could exceed roadway and transit system capacities. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on the roadway and transit system.

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

Potentially Significant Impact. The Los Angeles County Metropolitan Transportation Authority (Metro) administers the Congestion Management Program (CMP), a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on CMP facilities.

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

Less Than Significant Impact. The Project proposes a new 489-foot-tall, 42-story, high-rise residential tower with ground floor commercial/retail/restaurant uses. The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. However, the Project includes construction of an emergency helipad on the roof of the building at a height of 489 feet.

As discussed above, design, construction, and operation of the helipad would be subject to the requirements of LADBS and the LAFD. Additionally, the Project would be required to comply with applicable Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures. Furthermore, the Project would be required to comply with the notice requirements imposed by the FAA for all new buildings taller than 200 feet and would complete Form 7460-1 (Notice of Proposed Construction or Alteration). Adherence to all regulatory requirements and review and approval by all applicable agencies would ensure design and construction of the helipad would not pose a threat to the public. Therefore, impacts related to construction of the helipad would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the residential and commercial uses in the Project vicinity. Thus, no impacts related to increased hazard to a design feature would occur, and no further analysis of this topic in the EIR is required.

e. Result in inadequate emergency access?

Potentially Significant Impact. While it is expected that construction activities for the Project would primarily be confined on-site, the Project's construction activities would have the potential to cause temporary and intermittent lane closures in adjacent off-site streets (i.e., Figueroa Street and 8th Street), for the installation or upgrading of local

infrastructure. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. In addition, as part of the Project, existing site access would be modified. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on emergency access.

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?

Potentially Significant Impact. There are multiple public transportation opportunities in the immediate vicinity of the Project Site. In particular, the Metro 7th Street/Metro Center Station is located approximately 360 feet north of the Project Site. This station is served by Metro's Red, Purple, Blue, and Expo rail lines along with the Silver Line limited-stop bus route. Additionally, the Metro and Los Angeles Department of Transportation (LADOT) operate numerous bus lines with stops located in close proximity to the Project Site. Furthermore, the segment of Figueroa Street adjacent to the Project Site is currently being considered as one of several route variations for the Downtown Los Angeles Streetcar Project. The Project proposes new development that has the potential to result in an increased demand for alternative transportation modes or affect the operation of the Downtown Los Angeles Streetcar if the segment of Figueroa Street adjacent to the Project Site is selected as the final route. Therefore, further analysis of these topics in the EIR is required to determine the Project's potential to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities.

XVII. Tribal Cultural Resources

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

No Impact. As discussed in Checklist Question V.a, Cultural Resources, above, the Project Site is currently developed with a surface parking lot and does not contain any historic resource either listed or eligible for listing in the California Register or in a local register of historical resources. Therefore, no impacts to such resources would occur, and

no mitigation measures would be required. No further analysis of this topic in the EIR is required.

ii. Cause a substantial adverse change in the significance of site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?

Potentially Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As discussed above, the Project would require excavation at depths greater than those having previously occurred on the Project Site. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in requested consultations. Further analysis of this topic in the EIR is required to determine the Project's potential impacts to tribal cultural resources.

XVIII. Utilities

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. Wastewater collection and treatment services within the Project vicinity are provided by the City of Los Angeles Department of Public Works (LADPW). Wastewater generated during operation of the Project would be collected and discharged into the existing sewer main in Figueroa Street and conveyed to the Hyperion Treatment Plant (HTP) located in El Segundo. The HTP is a part of the Hyperion

Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). The treatment capacity of the entire Hyperion Treatment System is approximately 550 million gallons per day (mgd) (consisting of 450 mgd at HTP, 80 mgd at TWRP, and 20 mgd at LAGWRP). The HTP is designed to treat 450 mgd, with annual increases in wastewater flows limited to 5 mgd by City Ordinance No. 166,060. The HTP currently processes an average of 275 mgd on dry weather days, and therefore has an available capacity of approximately 175 mgd. 49

Incoming wastewater to the HTP initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where solids are allowed to either settle to the bottom of tanks or float on the surface. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge. After treatment is completed, the water is dispersed 5 miles offshore at a depth of 200 feet. As this treated effluent enters the ocean environment, it is diluted at a ratio of over 80 parts seawater to one part treated effluent. The discharge of effluent from the HTP into Santa Monica Bay is regulated by the HTP's NPDES Permit issued under the Clean Water Act and is required to meet the RWQCB's requirements for a recreational beneficial use. Accordingly, the HTP's effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.

The wastewater generated by the Project would be typical of commercial and residential uses. No industrial discharge into the wastewater system would occur. As the HTP is in compliance with the State's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the RWQCB. Therefore, impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

b. Require 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?

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⁴⁸ City of Los Angeles Department of Public Works Bureau of Sanitation. City of Los Angeles Integrated Resources Plan Executive Summary, December 2006, www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010394.pdf, accessed May 11, 2016.

City of Los Angeles LA Sanitation, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=g7xwthamm_334&_afrLoop=2481938731838445 4#!, accessed May 11, 2016.

Potentially Significant Impact. Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Construction of the Project would result in an increased water demand and wastewater generation from the Project Site. With regard to water, the location, condition, and capacity of water conveyance lines will be evaluated in an EIR to determine whether adequate capacity is available to accommodate the required fire flows and domestic water demand generated by the Project.

With regard to wastewater, as described in response to Checklist Question XVII.a, above, wastewater generated during Project operation would be collected and discharged into existing sewer mains and conveyed to the HTP, which has an available treatment capacity of approximately 175 mgd. Wastewater from the Project site enters the system through an existing 30-inch sewer main in Figueroa Street and flows through the remaining wastewater system to the HTP.

Based on sewage generation factors established by LADPW, Bureau of Engineering (BOE), the Project would generate an average of approximately 47,792 gallons per day (gpd) of wastewater. Currently, the existing parking lot generates an average of approximately 2,327 gpd. In total, when subtracting the current parking lot's wastewater flows, the Project would generate a net daily flow of 45,465 gpd. Table B-1 on page B-44 summarizes the Project Site sewer flows.

The City has approved the Sewer Capacity Availability Request for the Project, indicating the existing 30-inch sewer main in Figueroa Street would have adequate capacity to accommodate 100 percent of the additional infrastructure demand created by the Project. The Would have adequate capacity to serve the Project. No upgrades to existing sewer mains would be required.

Therefore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site, and impacts with respect to wastewater infrastructure would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

City of Los Angeles, Bureau of Engineering, Sewer Capacity Availability Request, April 25, 2016.

At the time the Sewer Capacity Availability Request (SCAR) was prepared, the proposed commercial square footage was assumed to be 9,733 square feet, which would result in wastewater generation of 487 gpd. The additional 15 gpd generated by the additional 310 square feet represents 0.03 percent of the net increase in wastewater flow and would not affect the findings of the SCAR.

Table B-1 Estimated Project Wastewater Generation

Land Use	Units	Generation Rate ^a (gpd)	Total Wastewater Generation (gpd)
Existing (to be removed)			
Parking Lot	46,546 sf	(0.05/sf)	2,327
Subtotal Existing			2,327
Proposed		•	•
Residential—Studio	122 du	(75/du)	9,150
Residential—1-bedroom	238 du	(110/du)	26,180
Residential—2-bedroom	62 du	(150/du)	9,300
Residential—3-bedroom	14 du	(190/du)	2,660
Commercial Area	10,043 sf	(0.05 sf)	502
Subtotal Proposed			47,792
Total Project Site Wastewater Generation (Proposed)			47,792
Project Net Wastewater Generation (Proposed – Existing to be Removed)			45,465

gpd = gallons per day

du = dwelling units

sf = square feet

Source: Eyestone Environmental, July 2016.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. As discussed in Checklist Question IX.c, Hydrology and Water Quality, stormwater flows from the Project Site would not increase with implementation of the Project. Additionally, the Project would provide appropriate on-site drainage improvements to better control runoff. As described above in Checklist Question IX.a, the Project would be required to comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. To this end, BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant,

Project wastewater generation was calculated using the City of Los Angeles Department of Public Works, Bureau of Engineering sewage generation factors.

and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Potentially Significant Impact. The Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site. As previously discussed, the Project would result in an increase in water demand. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on the water supply.

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

Less Than Significant Impact. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant. As described above, the Hyperion Treatment Plant has a capacity of 450 mgd and current wastewater flow levels are at 275 mgd, resulting in available capacity of 175 mgd. As discussed above and shown in Table B-1 on page B-44, the Project would result in an increase in wastewater generation of 45,465 gpd over existing conditions. The Project's increase in average daily wastewater flow of 45,465 gpd would represent approximately 0.03 percent of the 175 mgd remaining capacity. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Treatment Plant, and a less than significant impact would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. Various public agencies and private companies provide solid waste management services in the City of Los Angeles. Private collectors service most multi-family units and commercial developments, whereas the City Bureau of Sanitation (BOS) collects the majority of residential waste from single-family and some smaller multi-family residences. Solid waste generated by the Project would be transported by a private contractor and disposed at a major Class III (municipal) landfill located in Los Angeles County. Ten Class III landfills and one unclassified landfill with solid waste facility

permits are located within Los Angeles County.⁵² Of the ten Class III landfills in Los Angeles County, five Class III landfills are open to the City of Los Angeles.⁵³ Within Los Angeles County, there are two solid waste transformation facilities that convert, combust, or otherwise process solid waste for the purpose of energy recovery; these are the Commerce Refuse to Energy Facility and the Southeast Resource Recovery Facility, located in the City of Long Beach.

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. 54 Based on the most recent 2014 ColWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 112.09 million tons as of December 31, 2014.⁵⁵ For the Class III landfills open to the City, the remaining total disposal capacity is estimated at 93.47 million tons.⁵⁶ Additionally, in 2013, the County's Class III landfills open to the City (excluding the Calabasas Landfill) had a total maximum daily capacity of 26,949 tons per day (tpd) and an average daily disposal of 14,027 tpd, resulting in approximately 12,922 tpd of remaining daily disposal capacity.⁵⁷ Aggressive waste reduction and diversion programs on a countywide level have helped reduce disposal levels at the County's landfills. Based on the 2014 ColWMP Annual Report, the County anticipates that future disposal needs can be adequately met through 2029, which is well past the Project's buildout year (2020), via a multi-pronged approach that includes successfully permitting and developing proposed in-County landfill expansions, utilizing available or planned out-of-County disposal capacity, developing necessary infrastructure

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The ten Class III landfills within Los Angeles County include: Antelope Valley, Burbank, Calabasas, Chiquita Canyon, Lancaster, Pebbly Beach, San Clemente, Savage Canyon, Scholl Canyon, and Sunshine Canyon City/County. The total number of Class III landfills within Los Angeles County excludes the Puente Hills Landfill, which closed on October 31, 2013. The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation facility.

The five Class III landfills open to the City of Los Angeles include: Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. Note that while the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003.

⁵⁴ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015.

This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.

This total excludes the remaining disposal capacity at the Calabasas Landfill, which is only open to portions of the City that do not include the Project Site.

⁵⁷ County of Los Angeles Department of Public Works, Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015, Appendix E-1.

to facilitate exportation of waste to out-of-County landfills, and developing conversion and other alternative technologies.

The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling. The City of Los Angeles is currently diverting 76.4 percent of its waste from landfills. The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030 per the Solid Waste Integrated Resources Plan (SWIRP), which was adopted May 2009.

The Project Site is currently developed with surface parking. As such, the Project Site currently generates minimal solid waste. The Project would remove the existing surface parking areas and construct in their place 436 residential units, approximately 10,043 square feet of commercial uses, and parking. In addition, approximately 50,962 square feet of open space and recreational amenities would be provided. The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. As part of the Project, construction materials would be recycled in accordance with the City of Los Angeles Green Building Code (Ordinance No. 181,480), which requires a minimum construction waste reduction of approximately 50 percent. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County or within the Class III landfills open to the City. Specifically, it is estimated that approximately 81,000 cubic yards (cy) of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase. Given the remaining permitted capacity of the Azusa Land Reclamation facility of 52.8 million cubic yards, 60 as well as the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate Project's construction solid waste disposal needs.

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⁵⁸ City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed July 18, 2016.

⁵⁹ City of Los Angeles, Bureau of Sanitation, Solid Resources, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=30678382947751893&_afr WindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D306783829 47751893%26_afrWindowMode%3D0%26_adf.ctrl-state%3Df1ocw4578_206, accessed July 18, 2016.

Waste Management, Azusa Land Reclamation Fact Sheet, www.wmsolutions.com/pdf/factsheet/Azusa_Land Reclamation.pdf, accessed July 18, 2016.

As shown in Table B-2 on page B-49, based on the City's solid waste generation factors, the Project would generate approximately 5,789 pounds per day (lbs/day) of solid waste upon completion. The waste generation factors utilized do not account for recycling or other waste diversion measures, and as such, the estimated solid waste generated by the Project is likely conservative. In addition, this estimate is conservative as it does not account for the net effect of existing solid waste generated by existing uses. The estimated solid waste generated by the Project would represent approximately 0.04 percent of the daily solid waste disposed of by the City of Los Angeles in 2015 (the most recent year for which data is available).⁶¹ Furthermore, it represents approximately 0.02 percent of the remaining daily disposal capacity of the County's Class III landfills. As discussed below, in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), the Project would also provide a designated recycling area for Project residents to facilitate recycling, which would further reduce the Project's waste stream.

Based on the above, the landfills that serve the Project Site would have adequate capacity to accept the solid waste that would be generated by construction and operation of the Project. Impacts related to solid waste would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and landfill disposal. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and residential dwellings with five or more units to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. Additionally, in March 2006, the City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and

http://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx, accessed July 18, 2016.

The City of Los Angeles disposed of approximately 2.55 million tons of waste in 2015 at Class III landfills yielding an average daily disposal of 6,987 tons or 13,962,000 lbs/day. Source: County of Los Angeles, Public Works Department. Solid Waste Information System. Report for 2015 Yearly In-County Jurisdictions Solid Waste Disposal Report (Including Exports) By In-County and Out-of-County Facilities,

Table B-2					
Estimated Project Solid Waste Generation					

Proposed Land Use	Units	Generation Rate	Total Solid Waste Generated (lbs/day)
Residential ^a	436 du	12.23 lbs/du/day ^b	5,332
Retail and Restaurant	28 employees ^c	16.33 lbs/employee/dayd	457
Total			5,789

du = dwelling unit

sf = square feet

- ^a The City of Los Angeles CEQA Thresholds Guide does not provide separate rates for condominium units and apartment units.
- Factor from City of Los Angeles CEQA Thresholds Guide, 2006, page M.3-2.
- ^c Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Based on the employee generation rate for "Neighborhood Shopping Center" land uses, which is 0.00271 employees per average square foot.
- ^d Factor from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, July 2002.

Source: Eyestone Environmental, 2016.

conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or room of specified size on the Project Site. In addition, the Project would reuse concrete removed during site clearance to the maximum extent feasible and recycle construction materials in accordance with the City of Los Angeles Green Building Code (Ordinance No. 181,480), which requires a minimum construction waste reduction of approximately 50 percent. The Project would also promote compliance with AB 939, AB 341, and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts related to solid waste would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

⁶² Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

XIX. Mandatory Findings of Significance

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to the following subject areas: aesthetics, air quality, cultural resources, GHG emissions, land use and planning, noise, public services, parks and recreation, traffic, tribal cultural resources, and water supply. Therefore, the Project has the potential to degrade the quality of the environment. The EIR will be prepared to analyze and document these potentially significant impacts. Feasible mitigation measures will be recommended to reduce identified significant impacts. As discussed above under Checklist Question IV, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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).

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other development to result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: aesthetics, air quality, cultural resources, GHG emissions, land use and planning, noise, public services, parks and recreation, traffic, tribal cultural resources, and water supply.

With regard to cumulative effects for the issues of biological resources, geology and soils, hydrology and water quality, population and housing, and other utilities, the Project would not combine with related projects or other cumulative growth to result in significant cumulative impacts. With respect to agricultural resources and mineral resources, the

Project would have no impact to these resources and, therefore, could not combine with other projects to result in cumulative impacts. With respect to biological resources, the Project Site is located in an urbanized area and, similar to the Project, other developments occurring in the Project area would occur on previously disturbed land. The Project does not contain these resources and, therefore, could not contribute to a cumulative effect. With respect to hazards and hazardous materials and hydrology and water quality, these resource areas are generally site-specific and need to be evaluated within the context of each individual project. These resource areas will include site-specific technical analysis and mitigation, as necessary. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's standard mitigation practices during construction, which address these topics. Specifically for hydrology, similar to the Project, related projects that disturb more than one acre of soil would also be required to obtain coverage under the NPDES Construction General Permit (Order No. 99-08-DWQ) pursuant to NPDES requirements. Impacts with regards to this topic would be limited to the Project Site and not be increased when viewed in conjunction with related projects.

With regard to population and housing and solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed in the analysis above, the 1,064 estimated net new residents generated by the Project would represent approximately 0.97 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2016 and 2020, and the new residential units would constitute up to approximately 0.84 percent of the housing growth forecasted between 2016 and 2020. Furthermore, the Project would not result in a notable indirect increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles and the Central City Community Plan area.

With regard to solid waste, estimated solid waste generated by the Project would represent approximately 0.07 percent of the daily solid waste disposed of by the City of Los Angeles in 2015 (the most recent year for which data is available). 63 Furthermore, it represents approximately 0.05 percent of the remaining daily disposal capacity of the County's Class III landfills. Also, forecasts of regional demand are prepared for these services and their ability to meet future demand. Based on the 2014 ColWMP Annual Report, the County anticipates that future solid waste disposal needs can be adequately met through 2029.

The City of Los Angeles disposed of approximately 2.55 million tons of waste in 2015 at Class III landfills yielding an average daily disposal of 6,981 tons or 13,962,000 lbs/day. Source: County of Los Angeles, Public Works Department. Solid Waste Information System. Report for 2015 Yearly In-County Jurisdictions Solid Waste Disposal Report (Including Exports) By In-County and Out-of-County Facilities, http://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx, accessed February 11, 2016.

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

Potentially Significant Impact. As indicated by the analysis above, the Project could result in potentially significant impacts with regard to air quality, GHG emissions, land use and planning, noise, public services, parks and recreation, traffic, and water supply. As a result, these potential effects will be analyzed further in the EIR.

City of Los Angeles Fig & 8th October 2016