Initial Study

This document comprises the Initial Study as required under the California Environmental Quality Act

Central City Community Plan Area

Southern California Flower Market

Case Number: ENV-2016-3991-EIR

Location: 709-765 S. Wall Street, 306-326 E. 7th Street, and 750-752 S. Maple Avenue

Council District: 14, Jose Huizar

Project Description: The Project Applicant proposes to expand and redevelop the existing Flower Market facility between Maple Avenue and Wall Street, south of 7th Street, while maintaining the existing wholesale market. The existing property consists of two buildings, the north building (206,517 square feet) and the south building (185,111 square feet). Both buildings include open roof-top parking. The Applicant proposes to maintain and renovate the north building and its roof-top parking and demolish the south building in preparation of a new building with one level of subterranean parking.

The Project would be a new mixed-use development consisting of wholesale trade, retail, restaurant, office, and residential uses. The new Flower Market building (in place of the existing south building) would be 15 stories (12-story residential tower, over three stories of office, retail, restaurant, wholesale flower market and parking) and 205 feet in height. The development program would consist of: 323 residential units (the Applicant voluntarily providing 10% of the units [or approximately 32 units] for moderate income families), 58,866 square feet of office space, 4,385 square feet of retail space, 63,585 square feet of wholesale space and storage, 13,420 square feet of food and beverage space, and 9,226 square feet of event space. The ground floor of the new south building would include two restaurants for general public use, a public paseo, retail uses, wholesale flower space, and bike storage. The existing north building would continue operating as the Flower Market with offices on the second floor and an event space with terrace on the fourth floor. The Flower Market would continue to operate in the existing north building during and after the redevelopment, with construction carefully phased, to avoid disruption of existing business operations. Parking would be provided in accordance with Code requirements or an approved parking demand study.

APPLICANT:
Southern California Flower Growers, Inc.
755 S. Wall Street
Los Angeles, CA 90014

PREPARED BY:
CAJA Environmental Services
11990 San Vicente Boulevard, Ste. 250
Los Angeles, CA 90049

ON BEHALF OF:
The City of Los Angeles
Department of City Planning
Environmental Analysis Section
200 North Spring Street, Room 750
Los Angeles, CA 90012-2601

May 2017
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1. PROJECT DESCRIPTION

The subject of this Initial Study (IS) is the proposed Southern California Flower Market Project. The City’s Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA). The Initial Study is a preliminary analysis prepared by the Lead Agency to determine whether an Environmental Impact Report (EIR) or a Mitigated Negative Declaration must be prepared or to identify the significant environmental effects to be analyzed in an EIR.

Project Information

Project Title: Southern California Flower Market

Project Location: 755 South Wall Street, Los Angeles 90014

Project Applicant: Southern California Flower Growers, Inc.
755 S. Wall Street, Los Angeles, California 90014

Lead Agency: City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750, Los Angeles, California 90012
Attn: Karen Hoo

Regulatory Framework

According to CEQA Guidelines, Article 5. Preliminary Review of Projects and Conduct of Initial Study:

15063. INITIAL STUDY

(a) Following preliminary review, the Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.

(2) To meet the requirements of this section, the lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.

(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.
(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project’s effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plans described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project’s environmental effects.
(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs;

(7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.

(4) A discussion of the ways to mitigate the significant effects identified, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;

(6) The name of the person or persons who prepared or participated in the Initial Study.

Regional Setting

The Project Site is located at 755 S. Wall Street, in the Central City Community Plan area (CCCP) in the City of Los Angeles (City). The CCCP area is in the Downtown section of Los Angeles. The plan area is bounded by Sunset Boulevard/Cesar Chavez Avenue to the north; Alameda Street to the east; the Santa Monica Freeway (Interstate 10) to the south; and the Harbor Freeway (California State Route 110) to the west. The eastern edge of the approximately 2-mile wide by 2-mile long plan area is on the eastern edge of downtown Los Angeles, while the western edge abuts the western side of downtown Los Angeles. The CCCP area is surrounded by the City of Los Angeles community plan areas of Central City North to the north and the east; Southeast Los Angeles to the south; and both Westlake and South Los Angeles to the west.

See Figure 1, Regional Vicinity Map, for the location within the context of the City. See Figure 2, Aerial Map, for the Project Site and immediate surrounding areas.
Regional and Local Access

The Project Site is located in the Los Angeles Flower District, which generally is focused along 8th Street. The Flower Market is located along Wall Street, Maple Avenue, and 7th Street. Major highways serving the Project area include the Santa Monica Freeway (I-10), one mile to the south and the Interstate highway 110, one mile to the west.

Public Transit

The Project Site is located within 0.6 mile from the Pershing Square Metro Rail Station (Red/Purple lines), 0.7 mile from the 7th and Metro Center Rail Station (Red/Purple, Blue/Expo lines), and 1.2 miles from Pico Metro Rail Station (Blue/Expo lines) and Little Tokyo Metro Rail Station (Gold line). These subway lines provide access to the other transit lines operated by Metro. It is anticipated that the proximity of the Project Site to different Metro transit stations would encourage the use of transit by on-site permanent residents and their guests, retail and restaurant patrons, and employees. The Project Site is also served by two major transportation corridors (Main Street and 7th Street) that provide substantial public transit opportunities and facilities, including the Metro bus lines (51,52,60,351,760) on 7th Street, (16,17,316,20,28,35,38,351,68) on Maple Avenue, (51,52,351on San Pedro Street, 66 on 8th Street, and the LADOT DASH E on Los Angeles and 8th.

Site Characteristics

The Project Site’s assessor parcel numbers (APN), zoning, land use designation, and lot size are listed on Table 1. The total area that composes the Project Site is approximately 166,684 square feet (or approximately 3.8 acres). The Site is zoned M2-2D (Light Industrial, Height District 2 with Development Limitation) and is designated Light Manufacturing in the Central City Community Plan. The Project Site is also located within the Los Angeles State Enterprise Zone and the Greater Downtown Housing Incentive Area. In addition, the Project Site is located within a Transit Priority Area as defined by Public Resources Code Section 21099 and City of Los Angeles ZI No. 2452.1

<table>
<thead>
<tr>
<th>Address</th>
<th>APN</th>
<th>Zoning</th>
<th>Land Use Designation</th>
<th>Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>709-765 S. Wall St., 306-326 E. 7th St., and 750-752 S. Maple Ave.</td>
<td>5145-004-033, -034, and -035</td>
<td>M2-2D</td>
<td>Light Manufacturing</td>
<td>166,684 sf (3.8 acres)</td>
</tr>
</tbody>
</table>


1 “Transit Priority Areas” are defined (Public Resources Code 21099(a)(7)) as those areas located within 0.5 mile of an existing or planned major transit stop, which includes the intersection of two or more bus routes having a service frequency interval of 15 minutes or less during peak commute periods.
Existing Uses

The Project Site is currently developed as the Southern California Flower Market. The Los Angeles Wholesale Flower Terminal building (“south building”) was constructed for the Southern California Flower Market in 1962, and was one of the largest wholesale flower facilities in the world. A second building was constructed in 1981 (“north building”). The existing south building is 185,111 square feet and the north building is 206,517 square feet, and both buildings include open roof-top parking.

Surrounding Uses

The Project Site is surrounded by a mix of parking lots, warehouses, retail, and some commercial and residential uses contained in structures ranging from low-rise to medium-rise buildings, which are physically separated from the Project Site by secondary, collector, and local streets. Immediately to the west across Maple Avenue is a surface parking lot, retail, galleries, and four residential developments, the Santee Village (nearly 400 units), the Santee Court (238 units), the Garment Lofts (77 units) and the Textile Building Lofts (77 units) fronting on Los Angeles Street and 8th Street. To the immediate east is another flower wholesale market, the Los Angeles Flower Market. To the east of the Site across the 7th Street there is some retail and behind it a building with County services and a 5 floor parking structure. To the west of the Project Site both next and across the 8th Street there are retail uses.

Proposed Project

The Project Applicant proposes to expand and redevelop the existing Flower Market facility between Maple Avenue and Wall Street, south of 7th Street, while maintaining the existing wholesale market. The existing property consists of two buildings, the north building (206,517 square feet) and the south building (185,111 square feet). Both buildings include open roof-top parking. The Applicant proposes to maintain and renovate the north building and its roof-top parking and demolish the south building in preparation of a new building with one level of subterranean parking. The existing north building would continue operating as the Flower Market with offices on the second floor and an event space with terrace on the fourth floor. The Flower Market would continue to operate in the existing north building during and after the redevelopment, with construction carefully phased, to avoid disruption of existing business operations.

The Project would be a new mixed-use development consisting of wholesale trade, retail, restaurant, office, and residential uses in place of the existing south building. The new building would be 15 stories (12-story residential tower, over three stories of office, retail, restaurant, wholesale flower market and parking) and 205 feet in height. The development program would consist of: 323 residential units (the Applicant voluntarily providing 10% of the units [or approximately 32 units] for moderate income families), 58,866 square feet of office space, 4,385 square feet of retail space, 63,585 square feet of wholesale space and storage, 13,420 square feet of food and beverage space, and 9,226 square feet of event space. The ground floor of the new south building would include two restaurants for general public use, a public paseo, retail uses, wholesale flower space, and bike storage. Parking would be provided in compliance with Code requirements or an approved parking demand study.
Based on the net lot area of 166,684 square feet (3.8 acres - excluding dedications and the parking loading area at the north of the Project), the Project would have a maximum Floor Area Ratio (FAR) of 3.78:1 in conformance with the Vesting Zone Change request to the C2-2 zone and with the approval of the General Plan Amendment to the “Community Commercial” land use designation.

### Table 2
**Project Overview**

<table>
<thead>
<tr>
<th>Use</th>
<th>Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wholesale retail/storage/cooler</td>
<td>63,585 square feet</td>
</tr>
<tr>
<td>Office/art production</td>
<td>58,866 square feet</td>
</tr>
<tr>
<td>Retail</td>
<td>4,385 square feet</td>
</tr>
<tr>
<td>Food and Beverage</td>
<td>13,420 square feet</td>
</tr>
<tr>
<td>Event space/lobbies/other</td>
<td>9,226 square feet</td>
</tr>
<tr>
<td>Total Commercial Square Footage</td>
<td>149,482 square feet</td>
</tr>
<tr>
<td>Apartments</td>
<td>323 units</td>
</tr>
<tr>
<td>Total Residential Square Footage</td>
<td>420,787 square feet</td>
</tr>
</tbody>
</table>

*Source: Brooks + Scarpa Architects, 2016.*

**Project Design**

The Project’s design is intended to reflect the nature of its existing uses. The existing north building would be renovated and the façade would be covered by a flower-themed mural. The proposed public, open to the sky, paseo/plaza would allow pedestrian routes to converge in a covered, public passage between the two buildings that incorporates the residential entry together with access to the flower market. Storefront glazing would be used for the retail (city market) and the restaurants along the sidewalk, to enhance the appearance of the stores, sustain street level interest, and promote pedestrian traffic.

The new south building would be designed as three vertically terraced structures in order to provide visual separation and to soften the impact of the building’s height in relation to surrounding structures. The Project’s irregular geometry is also intended to soften the impact of the Project’s mass and height. Although the building is designed to be compatible with the neighborhood, it would differ in material palette and scale from its neighbors.

**Access and Parking**

Vehicular access to the Project would be via a private residential ramp with garage gates on Maple Avenue leading to the subterranean parking, a vehicular ramp leading to second and third floor shared parking on Wall Street, and a vehicular ramp leading to the commercial rooftop parking at the third floor.

As mentioned above, parking would be provided in compliance with Code requirements or an approved parking demand study. An existing loading dock with parking area is also located to the north of the existing north building and can be accessed from both Maple Avenue and Wall Street.
for the loading dock would be 24 hours per day, seven days per week. However, most deliveries are made by bob-tail trucks and vans and occur Monday, Wednesday, and Friday between 12:30 AM to 3:00 AM.

Open Space and Pedestrian Features

At the street level, the Project is intended to be pedestrian friendly, maintaining a strong street wall, with storefronts and a flower themed mural along Maple Avenue, and a public paseo that connects Maple Avenue and Wall Street by creating flexible open space for pedestrians. The Project is also intended to stimulate pedestrian activity by offering retail and restaurant opportunities at the ground level as well as movable and fixed outdoor furniture for the use of visitors and passers-by.

The Project would provide residential open space in excess of Code requirements. Based on the number of units and the mix of unit types, 33,025 square feet of open space is required, and a total of 49,457 square feet of open space would be provided. Additionally, 70,163 square feet of covered outdoor space would be provided in amenities and private balconies throughout the residential portions of the building.

Landscaping

The intention of the landscape design is to create a pedestrian-friendly environment that includes shade trees and landscape along the street. The mixed-use residential building would include a landscaped public paseo on the ground level to provide outdoor space for tenants of the building and to take advantage of the Southern California climate and create opportunities for socializing. Social and community spaces would include an outdoor garden on the second floor, a recreation room, group gathering areas, outdoor viewing terraces and decks, as well as quiet and intimate spaces. The landscaping for the Project Site would include both native and adaptive native plant materials.

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2013 California Green Building Standards Code (CalGreen), and will achieve a LEED Silver equivalent.

Construction Schedule/Haul Route

The Project is expected to be operational in 2019.

A Haul Route program will be required as part of the City’s permitting process. It is anticipated that the demolition, export, and construction debris would be transported to either the Chiquita Canyon Landfill in Castaic (option #1) or to the Manning Pit in Irwindale (option #2).

Requested Discretionary Actions

The City of Los Angeles (the City) is the Lead Agency for the Project. In order to construct the Project, the Applicant is requesting approval of the following actions from the City:
• General Plan Amendment from “Light Manufacturing” to “Community Commercial.” (Sec. 11.5.6)
• Vesting Zone Change from M2-2D to C2-2 zone. (Sec. 12.32 Q)
• Site Plan Review. (Sec. 16.05)
• Conditional Use Permit for on-site sales and consumption of alcoholic beverages. (Sec. 12.24 W.1)
• Vesting Tentative Tract Map No. 74568 for a 10-lot subdivision for merger, re-subdivision. (Sec. 17.0)
• Zone Variance to provide less than one on-site tree per four residential dwelling units. (Sec. 12.27)
• Other discretionary and ministerial permits and approvals that may be deemed necessary.
Figure 1
Vicinity Map


Figure 2
Aerial Map
# 2. INITIAL STUDY CHECKLIST

<table>
<thead>
<tr>
<th>LEAD CITY AGENCY</th>
<th>COUNCIL DISTRICT</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Los Angeles</td>
<td>14, Jose Huizar</td>
<td>May 2017</td>
</tr>
</tbody>
</table>

## RESPONSIBLE AGENCIES

## PROJECT TITLE/NO.
Southern California Flower Market

## PREVIOUS ACTIONS CASE NO.
N/A

<table>
<thead>
<tr>
<th>CASE NO. ENV-2016-3991-EIR</th>
</tr>
</thead>
</table>

## PROJECT DESCRIPTION:
See Section 1 (Project Description).

## ENVIRONMENTAL SETTING:
See Section 1 (Project Description).

## PROJECT LOCATION
709-765 S. Wall Street, 306-326 E. 7th Street, and 750-752 S. Maple Avenue, Los Angeles 90014

## PLANNING DISTRICT
Central City Community Plan Area

## STATUS:
- Preliminary
- Proposed
- Adopted 2003

## EXISTING ZONING
M2-2D

## MAX. DENSITY ZONING

- Does conform to plan

## PLANNED LAND USE & ZONE
Commercial; C2-2

## MAX. DENSITY PLAN
C2: 1 unit/400 square feet

## SURROUNDING LAND USES
Parking, warehouses, retail, commercial, residential

## PROJECT DENSITY
Proposed Floor-Area Ratio: 3.78:1

## DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Srimal K. Hewawitharana

Signature

Environmental Specialist II

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 a project like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less 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 “Earlier Analysis,” as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
   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 site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared
or outside document should, where appropriate, include a reference to the page or pages where
the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or
individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead
agencies should normally address the questions from this checklist that are relevant to a project’s
environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

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
- [ ] Agricultural and Forestry Resources
- [ ] Air Quality
- [ ] Biological Resources
- [ ] Cultural Resources
- [ ] Geology/Soils
- [ ] Greenhouse Gas Emissions
- [ ] Hazards & Hazardous Materials
- [ ] Hydrology/Water Quality
- [ ] Land Use/Planning
- [ ] Mineral Resources
- [ ] Noise
- [ ] Population/Housing
- [ ] Public Services
- [ ] Recreation
- [ ] Transportation/Traffic
- [ ] Tribal Cultural Resources
- [ ] Utilities/Service Systems
- [ ] Mandatory Findings of Significance

INITIAL STUDY CHECKLIST  (To be completed by the Lead City Agency)

BACKGROUND

PROPONENT NAME
Southern California Flower Growers, Inc.

PHONE NUMBER
213-627-2482

PROPONENT ADDRESS
755 S. Wall Street, Los Angeles, CA 90014

AGENCY REQUIRING CHECKLIST
City of Los Angeles Planning Department

DATE SUBMITTED
May 2017
ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitigation Incorporated</td>
<td>Mitigation Incorporated</td>
</tr>
<tr>
<td>Mitigation Incorporated</td>
<td>Mitigation Incorporated</td>
</tr>
</tbody>
</table>

I. Aesthetics. Would the project:

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

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state-designated scenic highway? □ □ ■ ■

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

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

Senate Bill (SB) 743, effective January 1, 2014, amended CEQA to provide that Aesthetic impacts of mixed-use projects on an urban infill site within a transit priority area “shall not be considered significant impacts on the environment.” “Infill sites” are defined (Public Resources Code 21099(a)(4)) as lots located within an urban area which have been previously developed, or vacant sites where at least 75 percent of the perimeter adjoins parcels that are developed with qualified urban uses. “Transit Priority Areas” are defined (Public Resources Code 21099(a)(7)) as those areas located within 0.5-mile of an existing or planned major transit stop, which includes the intersection of two or more bus routes having a service frequency interval of 15 minutes or less during peak commute periods.

On February 10, 2016, the City circulated Zoning Information File No. 2452 to clarify the locations of Transit Priority Areas within the City, and reaffirm that aesthetic impacts shall not be considered a significant impact on the environment when the provisions of SB 743 apply. A map of Transit Priority Areas within the City is attached to Zoning Information File No. 2452. As shown on that map the Project Site is within a Transit Priority Area.

Accordingly, the aesthetic impacts associated with the Project are not significant. However, the following discussion provides an analysis and disclosure of the potential aesthetic impacts of the Project for informational purposes only.
Response a:

As discussed above, based on SB 743 and City Zoning Information File No. 2452, the aesthetic impacts associated with the Project are not significant. Nevertheless, for the purpose of full disclosure, the potential impact on the scenic vista based on the increased height from the existing flower market buildings will be discussed in the EIR.

Response b:

As discussed above, based on SB 743 and City Zoning Information File No. 2452, the aesthetic impacts associated with the Project are not significant. However, the Project’s potential impact to historic resources will be evaluated in the EIR for the reason discussed in Section V, below.

Response c:

As discussed above, based on SB 743 and City Zoning Information File No. 2452, the aesthetic impacts associated with the Project are not significant. Nevertheless, for the purpose of full disclosure, the compatibility of the Project’s visual elements with the character of the surrounding area will be discussed in the EIR.

Response d:

As discussed above, based on SB 743 and City Zoning Information File No. 2452, the aesthetic impacts associated with the Project are not significant. Nevertheless, for the purpose of full disclosure, the potential impacts with regard to light, glare, and shade/shadow based on the new inclusion of a new 15-story tower on the Project Site will be discussed in the EIR.

II. Agricultural And Forestry Resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the

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Southern California Flower Market
Initial Study
Page 18 2. Initial Study Checklist
Forest Range and 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 (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ☐ ☐ ☐ ☑

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

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 122220(g)), timberland (as defined by Public Resources Code section 4526, or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? ☐ ☐ ☐ ☑

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

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

**Responses a-e:**

A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use, the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use, results in the rezoning of forest land or timberland, or involves other changes in the existing environment which, could result in conversion of Farmland to non-agricultural use. The Project Site is currently developed with two Flower Market buildings and associated parking, and is located in a highly urbanized area. The Site does not contain any agricultural uses, and is not delineated as such on any maps prepared.
pursuant to the Farmland Mapping and Monitoring Program. ² The Site is zoned for light industrial uses. No Williamson Act Contract applies to the Site. Therefore, no impact would occur. Further evaluation of this issue in the EIR is not required.

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<th>Potentially Significant Impact</th>
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### III. Air Quality.

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 applicable air quality 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 project region is non-attainment under an applicable federal or state ambient air quality standard including releasing emissions which exceed quantitative thresholds for ozone precursors?  
  - □  
  - □  
  - □  
  - □  

- **d.** Expose sensitive receptors to substantial pollutant concentrations?  
  - □  
  - □  
  - □  
  - □  

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

**Response a:**

A significant impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The Project Site is located within the 6,600 square mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [1-hour and 8-hour standards], PM$_{10}$, and PM$_{2.5}$). As such, the Project would be subject to the SCAQMD’s 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 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 air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide (RCPG), which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation control portions of the AQMP, and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RCPG and AQMP are based, in part, on projections originating with the City’s General Plan.

A significant impact may occur if the Project is inconsistent with the growth assumptions upon which the AQMP was based. As a result, Project development could have an adverse effect on the SCAQMD’s implementation of the AQMP. Therefore, this issue will be analyzed further in the EIR.

**Response b:**

A project would result in a significant air quality impact if project-related emissions exceed federal, state or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. Construction and operation of the Project would include new parking, commercial space, and 323 dwelling units, which have the potential to generate emissions which could exceed federal, state, or regional standards or thresholds or contribute to an existing or projected air quality violation. Therefore, this issue will be analyzed further in the EIR.

**Response c:**

A significant impact would occur if a project would result in a cumulatively considerable net increase in a federal or state non-attainment pollutant. With regard to determining the significance of the Project’s contribution to regional emissions, the SCAQMD recommends that a project’s potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, an individual project that generates construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. The Project has the potential to add a cumulatively considerable contribution to a federal or state non-attainment pollutant. Therefore, this issue will be analyzed further in the EIR.

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3 **SCAG is the federally designated metropolitan planning organization (MPO) for the southern California region.**
**Response d:**

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes. Sensitive receptors in the Project vicinity include multiple residential developments on Maple Avenue (Santee Village, Santee Court, and the Garment Lofts) as well as the Textile Building Lofts fronting on Los Angeles Street. The Project could expose these sensitive receptors to substantial pollutant concentrations during construction and operation. Therefore, this issue will be analyzed further in the EIR.

**Response e:**

A significant impact would only occur if a project would generate substantial odors. The SCAQMD’s CEQA Air Quality Handbook identifies those land uses that are associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any of the uses identified by the SCAQMD as being associated with odors. While the Project does include restaurant uses, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project’s long-term operations phase to a less than significant level.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Via mandatory compliance with SCAQMD rules, no construction activities or materials are proposed which would create a significant level of objectionable odors and would limit potential objectionable odor impacts during the Project’s short-term construction phase to a less than significant level. Therefore, further evaluation of this issue is not required.

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4 South Coast Air Quality Management District, CEQA Air Quality Handbook, Figure 5-1, April 1993.
IV. Biological Resources. Would the project:

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<tr>
<th></th>
<th>Potentially Significant Impact</th>
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<th>Less Than Significant Impact</th>
<th>No Impact</th>
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<tbody>
<tr>
<td>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, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</td>
<td>☐</td>
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<tr>
<td>b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</td>
<td>☐</td>
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<tr>
<td>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?</td>
<td>☐</td>
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<tr>
<td>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?</td>
<td>☐</td>
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<tr>
<td>e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?</td>
<td>☐</td>
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<td>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?</td>
<td>☐</td>
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Response a:

A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited above. The Project Site is located in an urbanized area of Los Angeles and is currently developed with two existing flower market buildings and other hard surfaces, and minimal ornamental landscaping. The Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value. No
hydrological features are present on the Site and there are no sensitive habitats present. Due to the lack of biotic resources, no candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Game (CDFG), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS) would be expected to occur on the Site. Therefore, a less than significant impact would occur and no mitigation measures would be required. Further evaluation of this issue in the EIR is not required.

Response b:

A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the state and federal regulatory agencies cited would be adversely modified by a project. There are no riparian areas located on or adjacent to the Project Site. Therefore, no impact would occur and further evaluation of this issue in the EIR is not required.

Response c:

A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. Review of the National Wetlands Inventory identified no wetlands or water features on the Project Site. Therefore, no impact would occur and further evaluation of this issue in the EIR is not required.

Response d:

A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is developed with two existing flower market buildings and other hard surfaces and currently does not interfere substantially with the movement of any native resident or migratory birds. The Site is located within an urban area that is highly disturbed and which contains numerous high-rise buildings. The nearest location that contains vegetation with the potential for supporting migratory bird and/or wildlife use is Pershing Square, located approximately 0.8 miles to the northwest. The Project would develop one 15-story tower on the Site. Although buildings of this height could potentially interfere with bird movement, the presence of several buildings of a similar height in the vicinity would generally act as a discouragement to major bird migration. Additionally, downtown Los Angeles is not known as being located within a significant bird migration route. No bodies of water exist on the Site to provide habitat for fish. As such, Project implementation would neither interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors nor would it impede the use of native wildlife nursery sites. Therefore, Project impacts would be less than significant and further evaluation of this issue in the EIR is not required.

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Response e:

A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. The Project would be confined to a previously developed site and would not involve substantial changes in the existing environment. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica var. californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).\(^7\) No City-protected trees are present on the Project Site. The Project would remove the existing non-native trees on the Site and would provide replacement per applicable City requirements. Therefore, no impact would occur and further evaluation of this issue in the EIR is not required.

Response f:

A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of Los Angeles and is currently developed with two flower market buildings, paving, and minimal ornamental landscaping. The Site is not located in or adjacent to an existing or proposed Significant Ecological Area.\(^8\) Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and further evaluation of this issue in the EIR is not required.

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V. Cultural Resources: Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?
   - [ ]
   - [ ]
   - [ ]
   - [ ]

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?
   - [ ]
   - [ ]
   - [ ]
   - [ ]

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

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\(^7\) *City of Los Angeles, Ordinance 177404, approved March 13, 2006 and effective April 23, 2006.*

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

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<th>Potentially Significant Impact</th>
<th>Less Than Significant Mitigation Incorporated</th>
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**Response a:**

Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency’s determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

The State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The oldest part of the existing flower market was built in approximately 1962, making it approximately 55 years old. Therefore, this issue will be analyzed further in the EIR.

**Response b:**

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the Project was to affect archaeological resources that fall under either of these categories. The Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.\(^9\) The Project Site is located in a highly urbanized area of the Central City Community Plan Area of the City of Los Angeles, and has been disturbed by past development activities. However, the Project includes one level of subterranean parking. Thus, the potential exists for the accidental discovery of unknown archaeological materials. Therefore, this issue will be analyzed further in the EIR.

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\(^9\) *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*
Response c:

A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in the Central City Community Plan Area of the City of Los Angeles, and as described above, the Project Site has been previously graded and is currently developed with the Southern California Flower Market. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources. Although no paleontological resources are known to exist on-site, there is a possibility that paleontological resources exist at sub-surface levels on the Project Site and may be uncovered during excavation for the level of subterranean parking. Therefore, this issue will be analyzed further in the EIR.

Response d:

A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. The Project Site is located in a heavily urbanized area, and is developed with the existing flower market. The likelihood of encountering human remains on the Project Site is therefore minimal. However, during the construction phase and excavation of the subterranean parking level, there is a possibility that human remains could be encountered, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. As such, this issue will be analyzed further in the EIR.

VI. Geology and Soils. In accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it results in any of the following impacts to future residents or users:

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, caused in whole or

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10 City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.
in part by the project’s exacerbation of the existing environmental conditions. Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking caused in whole or in part by the project’s exacerbation of the existing environmental conditions.

iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project’s exacerbation of the existing environmental conditions.

iv. Landslides, caused in whole or in part by the project’s exacerbation of the existing environmental conditions.

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

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, caused in whole or in part by the project’s exacerbation of existing environmental conditions.

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, caused in whole or in part by the project’s exacerbation of existing environmental conditions.

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?

Response a.i:

Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. In addition, the City of Los Angeles designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential.
There are several principal active faults in the metropolitan region. The greatest of these is the San Andreas Fault, approximately 35 miles (55 kilometers) northwest of downtown Los Angeles, on the other side of the San Gabriel Mountains. Several other important active faults lie closer to and even within the populated area of greater Los Angeles. These include the Sierra Madre fault zone, which runs through parts of Altadena and other foothills communities, the Raymond Fault in San Marino, and the Hollywood and Santa Monica Faults along the southern edge of the Hollywood Hills and Santa Monica Mountains.

The Site is not within an Alquist-Priolo Fault Zone or a Fault Rupture Study Zone. The Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards, and with seismic safety requirements in the UBC and the LAMC. Nonetheless, as the Site is located in a seismically active region, potential impacts associated with fault rupture will be analyzed further in the EIR.

Response a.ii:

A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Southern California is active seismic region (UBC Seismic Zone IV). Although the Project Site is not within an Alquist-Priolo Zone, the Site is susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Site is moderate to strong ground shaking. The Project would conform to all applicable provisions of the City Building Code and the UBC with respect to new construction. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Nonetheless, as the Site is located in a seismically active region, this potential impact from ground shaking will be analyzed further in the EIR.

Response a.iii:

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose to medium dense sand and silty sand are factors that could contribute to the potential for liquefaction. The Project Site is not identified by ZIMAS as being within a liquefaction zone. The City of Los Angeles Seismic Safety Element does not identify the Project Site as being within a liquefiable area, but there are some areas nearby that are susceptible to

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12 Ibid.
liquefaction. The Project would be required to comply with building regulations set forth by the State Geologist, which require site analysis prior to development. Furthermore, the Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards including liquefaction. Nonetheless, because the Project Site is near susceptible areas, potential impacts associated with liquefaction will be analyzed further in the EIR.

Response a.iv:

A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides can occur on slopes under normal gravitational forces and during earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is topographically level and is not identified by ZIMAS as being within a landslide hazard zone. Therefore, no impact would occur and further evaluation of this issue in the EIR is not required.

Response b:

A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Construction activities such as grading and excavation could create a potential for soil erosion. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

Response c:

A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The degree to which geologic or soil instabilities exist at the Project Site are unknown at this time. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

Response d:

A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink as water is drawn away. If soils below the development consist of expansive clays within a zone where the water content can fluctuate, foundation movement and/or damage can occur. The degree to which expansive soils exist at the Project Site is unknown at this time. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

13 City of Los Angeles, Safety Element of the General Plan, Areas Susceptible to Liquefaction, Exhibit B.
Response e:

A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur. Further evaluation of this issue in the EIR is not required.

<table>
<thead>
<tr>
<th>V. Greenhouse Gas Emissions. Would the project:</th>
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<tbody>
<tr>
<td>a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?</td>
</tr>
<tr>
<td>b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</td>
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<tr>
<td>Responses a and b:</td>
</tr>
<tr>
<td>Construction and operation of the Project have the potential to generate greenhouse gas emissions because the Project will result in new construction and uses, which may directly or indirectly have a significant impact on the environment. In addition, the Project will need to be fully evaluated for consistency with all applicable plans, policies, and regulations for the purpose of reducing the emissions of greenhouse gases. Therefore, the Project’s generation of greenhouse gas emissions and consistency with plans will be analyzed in the EIR.</td>
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<tr>
<th>VIII. Hazards and Hazardous Materials. In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact related to hazards and hazardous materials if it would:</th>
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<tbody>
<tr>
<td>a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</td>
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</table>
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.

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<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
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c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

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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 caused in whole or in part by the project’s exacerbation of existing environmental conditions.

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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.

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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.

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

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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 caused in whole or in part by the project’s exacerbation of existing environmental conditions.

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**Response a:**

A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal.
During operation, the proposed residential and commercial uses would store and use maintenance products, such as cleaning materials. Since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, this issue will be analyzed further in the EIR.

**Response b:**

A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. The Project includes the demolition of the existing south building and the renovation of the existing north building. Therefore, the potential exists for the Project to create a significant hazard to the public or environment involving the release of hazardous materials into the environment. Therefore, this issue will be analyzed further in the EIR.

**Response c:**

A significant adverse effect may occur if a Project Site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Project Site is located within 500 feet of the Jardin de la Infancia School, which is located 307 7th Street. The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. However, since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, further analysis of this issue in the EIR is required.

**Response d:**

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. A Phase I Environmental Site Assessment is being prepared for the Project Site, which will determine whether the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. Therefore, this issue will be analyzed further in the EIR.

**Responses e and f:**

A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. The Project Site is not located in the vicinity of a public airport or private airstrip. Therefore, no impact would occur. Further evaluation of this issue in the EIR is not required.

**Response g:**
A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The construction and operation activities have the potential to impede public access or travel upon public rights-of-way as well as interfere with any adopted emergency response or evacuation plan. Therefore, this issue will be analyzed further in the EIR.

Response h:

A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone. The Project Site is not located within a designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element. Therefore, no impact would occur. Further evaluation of this issue in the EIR is not required.

IX. Hydrology And Water Quality. Would the project:

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<tbody>
<tr>
<td>a. Violate any water quality standards or waste discharge requirements?</td>
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<tr>
<td>b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?</td>
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<tr>
<td>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?</td>
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<tr>
<td>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?</td>
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16 City of Los Angeles, Safety Element of the General Plan, Selected Wildfire Hazard Areas, Exhibit D.
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?

Response a:

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the City’s Low Impact Development Ordinance and/or Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The Project involves the redevelopment of a Project Site that is currently developed and completely paved. The Project would not alter the existing surface water runoff drainage pattern, would not alter rainfall absorption at the Site, and would not result in a net increase of rates of stormwater discharge which may exceed water quality standards or waste discharge requirements. Therefore, this potential impact on water quality standards or waste discharge requirements would be less than significant and further evaluation in the EIR is not required.

Response b:

A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. The Project does not propose any permanent groundwater wells or pumping activities and all water supplied to the Site would be derived
from the City’s existing water supply and infrastructure. In addition, the Project would not increase the amount of impervious surface area located on the Project Site upon completion of Project construction. Although construction of the Project would include excavation and could possibly require dewatering at the Site, the amount of groundwater infiltration likely to occur would be minimal given the small area and relatively shallow depth of the proposed excavation (for one level of subterranean parking). Therefore, this potential impact would be less than significant and further evaluation in the EIR is not required.

Response c:

A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project. There are no natural watercourses on the Project Site. The Site is currently fully developed. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Site. However, compliance with the requirements of the mandated construction Stormwater Pollution Prevention Plan (SWPPP) under the NPDES Construction General Permit (Order No. 2012-0006-DWQ) and City grading and building permit regulations would reduce the occurrence of erosion and siltation during construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in the EIR is not required.

Response d:

A significant impact may occur if a project results in increased runoff volumes during construction or if operation of the Project would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns of the Site and off-site flows. The Site is currently fully developed. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Site. However, compliance with the requirements of the mandated construction SWPPP under the NPDES Construction General Permit (Order No. 2012-0006-DWQ) and City grading and building permit regulations would reduce the occurrence of erosion and siltation during construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in the EIR is not required.

Response e:

A significant impact may occur if a project would increase the volume of stormwater runoff to a level which exceeds the capacity of the storm drain system serving the Project Site, or if the Project would introduce substantial new sources of polluted runoff. Construction of the Project could contribute to the degradation of existing surface water quality conditions primarily due to: 1) potential erosion and sedimentation during the grading phase; 2) particulate matter from dirt and dust generated on the Site; and 3) construction activities and equipment. However, compliance with the requirements of the mandated construction and operation SWPPP, as well as with the requirements of the City’s Low Impact Development Ordinance and/or SUSMP, would reduce the amount of additional stormwater runoff from the Project Site and the introduction of pollutants to stormwater runoff during construction and operation.
to the maximum extent practicable. Development of the Project would not increase overall stormwater runoff volume as the Project Site is currently completely covered with impervious surfaces. Therefore, this potential impact would be less than significant and further evaluation in the EIR is not required.

Response f:

As previously discussed, the Project could involve the use of contaminants that could potentially degrade water quality if not properly handled and stored. However, compliance with the requirements of the mandated construction and operation Stormwater Pollution Prevention Plans (SWPPP), as well as with the requirements of the City’s Low Impact Development Ordinance and/or SUSMP, would reduce the introduction of contaminants to stormwater runoff during Project construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in the EIR is not required.

Response g-h:

The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods. The Site is not located within a City-designated 100-year or 500-year flood plain. As the Site is located in an area of minimal flooding, the Project would not introduce people or structures to an area of high flood risk. Therefore, the Project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further analysis of this issue is required.

Response i:

A significant impact may occur if a project were located in an area where flooding, including flooding associated with dam or levee failure, would expose people or structures to a significant risk of loss, injury, or death. The Project Site is not located within a potential inundation area resulting from the failure of a dam or levee. As such, no impact would occur and no further analysis of this issue is required.

Response j:

A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area, and is located at least 12 miles from the Pacific Ocean and is not near any major water bodies. Therefore, there is no impact associated with seiches or tsunamis at the Site. In addition, the Site is in an urbanized portion

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18 City of Los Angeles, Safety Element of the General Plan, 100-Year and 500-Year Flood Plains, Exhibit F.
of the City of Los Angeles, and is relatively flat, thereby limiting the potential for inundation by mudflow. No impact would occur and further analysis of this issue is not required.

| Potentially Significant Impact | Less Than Significant Impact | Mitigation Incorporated | No Impact |

X. **Land Use And Planning.** Would the project:

a. Physically divide an established community? □ □ □ □

b. Conflict with any 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? □ □ □ □

**Response a:**

A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located in a highly urbanized area of the City and is currently developed with the Southern California Flower Market, which would continue to operate at the Site. Additionally, the Project Site is entirely surrounded by existing developments and roadways. Thus, the Project would not physically divide an established community and no impacts related to this issue would occur. No further analysis of this issue is required.

**Response b:**

A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project would require several discretionary actions by the City, which could conflict with land use plans, policies or regulations, leading to a potentially significant impact. The EIR will provide additional analysis to assess the potential impact from the Project’s consistency with applicable General Plan policies, zoning code restrictions, Southern California Association of Governments (SCAG) policies, any other applicable City (such as the Central City Community Plan) or regional plans and policies (such as the SCAQMD and Metro CMP).
Response c:

A significant impact may occur if a project is inconsistent with policies in any draft or adopted conservation plan. The Project Site is currently developed and is located in an urbanized area. As discussed under Checklist Question IV(f), there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Site. Implementation of the Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in the EIR is not required.

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<th>XI. Mineral Resources</th>
<th>Would the project:</th>
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<td>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?</td>
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<tr>
<td>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?</td>
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Response a:

A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, and if the project converted an existing or potential future regionally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a City-designated oil field or oil drilling area,19 or a City-designated Mineral Resource Zone 2 Area (MRZ-2).20 Therefore, the Project would have no impact with respect to loss of availability of a known regionally-important mineral resource and further evaluation is not required.

Response b:

A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for extraction of a locally-important mineral resource extraction. The Project Site is not located within a City-designated oil field or oil drilling area,19 or a City-designated Mineral Resource Zone 2 Area (MRZ-2).20 Therefore, the Project would have no impact with respect to loss of availability of a known locally-important mineral resource and further evaluation is not required.

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20 City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.
potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address “minerals and other natural resources.” According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. Much of the area around the Project Site has been developed with structures and is inaccessible for mining extraction.21 Furthermore, the Project Site is developed and located in an urbanized area. Development of the Project would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact would occur and further evaluation of this issue in the EIR is not required.

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### XII. Noise

Would the project result in:

- a. Exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?  
  - Potentially Significant Impact
  - Less Than Significant Impact
  - Mitigation Incorporated
  - No Impact

- b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?  
  - Potentially Significant Impact
  - Less Than Significant Impact
  - Mitigation Incorporated
  - No Impact

- c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?  
  - Potentially Significant Impact
  - Less Than Significant Impact
  - Mitigation Incorporated
  - No Impact

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?  
  - Potentially Significant Impact
  - Less Than Significant Impact
  - Mitigation Incorporated
  - No Impact

- 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?  
  - Potentially Significant Impact
  - Less Than Significant Impact
  - Mitigation Incorporated
  - No Impact

- 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?  
  - Potentially Significant Impact
  - Less Than Significant Impact
  - Mitigation Incorporated
  - No Impact

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21 Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.
Response a:

A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Construction would require the use of construction equipment during demolition, grading, excavation, hauling, establishing building foundations, and other construction activities. The concurrent use of construction equipment and machinery has the potential to increase noise levels above the applicable standards of the City’s Noise Ordinance. Existing on-site noise sources include the flower market buildings that currently occupy the Project Site. The Project would increase the activities and associated noise that would occur on the Site. In addition, the traffic attributable to the Project has the potential to cause noise levels to exceed City Noise Ordinance standards. Therefore, the potential impact from these noise increases will be analyzed further in the EIR.

Response b:

A significant impact would occur if the Project were to generate or expose people to excessive groundborne vibration or groundborne noise levels. Construction of the Project would require the use of heavy construction equipment during demolition, grading, excavation, hauling, establishing building foundations, and other construction activities. The use of earthmoving equipment and machinery has the potential to cause groundborne vibration and noise. During operation, groundborne vibration may also occur from increased road traffic or other on-site activities. Therefore, this issue will be analyzed further in the EIR.

Response c:

A significant impact may occur if the Project would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the Site. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels which. Therefore, this issue will be analyzed further in the EIR.

Response d:

A significant impact may occur if a project were to introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the Project or on a periodic basis during the operation of the Project. As discussed above, construction activity has the potential to temporarily or periodically increase ambient noise levels above existing levels. In addition, the increase in on-site uses may also result in periodic increases in noise levels. Therefore, this issue will be analyzed further in the EIR.

Response e:

A significant impact may occur if a project is located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity
of the Project Site during construction of the Project. As discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. The Project would therefore not expose people residing or working in the Project area to excessive noise levels from an airport use. Therefore, no impact would occur and further evaluation of this issue is not required.

Response f:

This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. As discussed under Checklist Question VIII(f), there are no private airstrips in the vicinity of the Site. Therefore, no impact would occur and further evaluation of this issue is not required.

XIII. Population And Housing. Would the project:

<table>
<thead>
<tr>
<th>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)?</th>
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<th>b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?</th>
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<table>
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<tr>
<th>c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?</th>
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Response a:

A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project would result in the generation of jobs (both for construction and operation) and would also result in an increased residential population. Therefore, this issue will be further analyzed in the EIR.

Response b:

A significant impact may occur if a project would result in displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere. The Project would not displace any housing since there is no housing on the Site. Further, the Project would develop residential units. Therefore, no impact would occur and further evaluation in the EIR is not required.
Response c:

A significant impact may occur if a project would result in displacement of existing residents, necessitating the construction of replacement housing elsewhere. The Project would not displace people necessitating the construction of replacement housing elsewhere. There is no housing on the Site. Therefore, no impact would occur and further evaluation in the EIR is not required.

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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?**
  - [ ]
  - [ ]
  - [ ]
  - [ ]
  - [ ]

- **b. Police protection?**
  - [ ]
  - [ ]
  - [ ]
  - [ ]
  - [ ]

- **c. Schools?**
  - [ ]
  - [ ]
  - [ ]
  - [ ]
  - [ ]

- **d. Parks?**
  - [ ]
  - [ ]
  - [ ]
  - [ ]
  - [ ]

- **e. Other public facilities?**
  - [ ]
  - [ ]
  - [ ]
  - [ ]
  - [ ]

Response a:

A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the Project based upon response time, access, or fire hydrant/water availability, necessitating the construction of a new or physically altered facility. The Project is served by:

- Fire Station No. 9, located at 430 E. 7th Street.

The Project would increase the intensity of development at the Project Site, and therefore, the potential impact of the Project on fire protection services will be analyzed in the EIR.

Response b:

A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project, necessitating a new or physically altered station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The Project is within the LAPD’s Central Community
Police Station service area, located at 251 E. 6th Street. The Project would increase the intensity of development at the Project Site, and therefore, the potential impacts of the Project on police protection services will be analyzed in the EIR.

**Response c:**

A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project would directly impact local schools by providing new housing to families with school-age children, and indirectly impact schools by providing jobs that may cause employees with families to relocate to an area. Thus, the potential impact of the Project on school facilities will be analyzed in the EIR.

**Response d:**

A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities and the construction of which could cause significant environmental impacts. The Project includes the development of residential uses that would increase the permanent residential population of the area. Residential developments typically have the greatest potential to result in impacts to parks since they generate a permanent increase in residential population. Therefore, the EIR will evaluate the Project’s on-site open space and recreational amenities and will determine the impacts on park facilities.

**Response e:**

A significant impact may occur if a project includes substantial employment or population growth that could exceed the capacity of public facilities (such as libraries), necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment. The Project is served by the Los Angeles Public Library (LAPL). The Central Library located at 630 W. 5th Street is the closest library to the Site. Residential developments typically have the greatest potential to result in impacts to libraries since they generate a permanent increase in residential population. Therefore, the EIR will evaluate the Project’s potential impacts upon library facilities.

22 LAPD: http://www.lapdonline.org/central_community_police_station
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?  □  □  □  □

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?  □  □  □  □

Response a:

A significant impact may occur if the Project would include substantial employment or population growth that could generate an increased demand for public park facilities which exceeds the capacities of existing parks and/or cause premature deterioration of the park facilities. The Project involves the construction of new residential uses that could increase the demand for neighborhood and regional parks and recreational facilities in the area (see XIV, Parks). While on-site open space and recreational amenities would be included, the Project has the potential to increase demands upon several public park facilities located within the Project area. The EIR will evaluate the potential of the Project to cause an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur.

Response b:

As discussed above, the Project has the potential to increase demands upon recreational facilities that may in turn require the construction of new facilities or the expansion of existing facilities. The construction of these facilities may have an adverse physical effect on the environment. Therefore, the potential of such facilities to have an adverse effect on the environment will be analyzed in the EIR.
XVI. Transportation/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?

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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?

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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?

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

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e. Result in inadequate emergency access?

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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?

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Response a:

A significant impact would occur if the Project generated traffic at each study intersection would exceed City of Los Angeles Department of Transportation (LADOT) standards. According to LADOT policy, a significant Project impact would occur when the Critical Movement Analysis (CMA) value increases by 0.010 or more when the final Level of Service (LOS) at a given study intersection is E or F; by 0.020 or more when the final LOS is D; or by 0.040 or more when the final LOS is C. It is unknown at this time whether the Project may result in potentially significant traffic impacts during construction and operation. The potential impacts of the Project will be evaluated in a traffic study in accordance with the assumptions, methodology, and procedures approved by LADOT and will be included in the EIR.
Response b:

A significant impact may occur if adopted California Department of Transportation (Caltrans) and County of Los Angeles Metropolitan Transit Authority (MTA) thresholds are exceeded. The Congestion Management Program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network which includes all state highways and some arterials within the County of Los Angeles. If the level of service standard deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan that is in conformance with the Los Angeles County CMP. The intent of the CMP is to provide information to decision-makers to assist in the allocation of transportation funds through the State Transportation Improvement Program (STIP) process. A CMP traffic impact analysis is required if a project would add 150 or more trips to the freeway, in either direction during either the AM or PM weekday peak hour. An analysis is also required at all CMP monitoring intersections where a project would add 50 or more peak hour trips. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. It is unknown at this time whether the Project may result in a potentially significant traffic impact at any CMP monitoring locations. Therefore, this issue will be analyzed further in the EIR.

Response c:

A significant impact would occur if a proposed project included an aviation-related use and would result in safety risks associated with such use. The Project does not include any aviation-related uses. Furthermore, as discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or private use airport. Safety risks associated with a change in air traffic patterns would not occur. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in the EIR is not required.

Response d:

A significant impact may occur if a project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. It is unknown at this time whether the Project may increase hazards due to a design feature. Therefore, this issue will be analyzed further in the EIR.

Response e:

A significant impact may occur if a project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The increased traffic during construction and operation could obstruct emergency vehicle access to the Project Site and adjacent uses in the Project vicinity. Therefore, the EIR will provide additional analysis to assess the potential of the Project to result in impacts on emergency access.
Response f:

A significant impact may occur if a project would conflict with adopted policies or involve modification to existing alternative transportation facilities located on- or off-site. There are nearby bus stops on 7th Street, Maple Avenue, and San Pedro Street. The potential of the Project to decrease the performance of these facilities or conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

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

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or

b. A resource determine 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Response a:

The Project Site does not contain any structures identified as historic resources under federal, state or local registers. Further, while the oldest part of the existing flower market building was built in approximately 1962, making it roughly 55 years old, it is not a sacred place with cultural value to a California Native American tribe. Therefore, impacts would be less than significant and no further analysis is necessary.
Response b:

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 (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

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 previously discussed under Question 5(b), the Project Site does not contain any known archaeological sites or survey areas, and, no known traditional burial sites or other human remains are expected to exist on the Project Site. However, the Project includes one level of subterranean parking. Thus, the potential exists for the accidental discovery of unknown archaeological materials or human remains. Therefore, this issue will be analyzed further in the EIR.
XVIII. Utilities and Service Systems. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  
   - Potentially Significant Impact □  
   - Less Than Significant With Mitigation Incorporated □  
   - Less Than Significant Impact □  
   - No Impact □

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?  
   - Potentially Significant Impact □  
   - Less Than Significant With Mitigation Incorporated □  
   - Less Than Significant Impact □  
   - No Impact □

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?  
   - No Impact □

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?  
   - Potentially Significant Impact □  
   - Less Than Significant With Mitigation Incorporated □  
   - Less Than Significant Impact □  
   - No Impact □

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?  
   - Potentially Significant Impact □  
   - Less Than Significant With Mitigation Incorporated □  
   - Less Than Significant Impact □  
   - No Impact □

f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?  
   - Potentially Significant Impact □  
   - Less Than Significant With Mitigation Incorporated □  
   - Less Than Significant Impact □  
   - No Impact □

g. Comply with federal, state, and local statutes and regulations related to solid waste?  
   - No Impact □

Response a:

A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. The City of Los Angeles Department of Public Works provides wastewater services for the Project Site. Wastewater discharges are conveyed to the Hyperion Treatment Plant (HTP), which is a public facility and is therefore subject to the state’s wastewater treatment requirements which, in the Project area, are enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB). The HTP has a current capacity of 450 million gallons per day (mgd). The Project’s introduction of new residential and commercial uses could result in the potential to exceed wastewater treatment requirements of the LARWQCB. Therefore, this issue will be analyzed in the EIR.
Response b:

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that new facilities would be needed, the construction of which would cause significant environmental effects. The Project is expected to increase water usage and wastewater generated as compared to the existing uses on the Project Site. It is not known whether the Project may result in a significant impact with respect to the capacity of the water and wastewater treatment plants and the existing water and sewer lines that serve the Site. Thus, potential impacts to the public water and wastewater infrastructure system will be analyzed in the EIR.

Response c:

A significant impact may occur if the volume of stormwater runoff were to increase to a level exceeding the capacity of the storm drain system serving the Project Site, to the extent that existing facilities would need to be expanded and the construction of which would cause significant environmental effects. The Project Site is currently fully developed and covered with impervious surfaces. Development of the Project would not increase the amount of impervious surface area at the Site and, consequently, would not increase the volume of stormwater runoff from the Site. Therefore, this impact would be less than significant and no further evaluation of this issue is required in the EIR.

Response d:

A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The Project is estimated to increase water consumption as compared to the existing uses on the Site. Any potential impacts with respect to water supply will be analyzed within the EIR.

Response e:

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed under Checklist Question XVII(b), the Project is estimated to generate an increase in wastewater as compared to the existing development on the Site. Therefore, this potential impact related to wastewater treatment plant capacity and availability will be analyzed in the EIR.

Response f:

A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The potential impacts associated with the ability of the local landfills to serve the Project will be analyzed in the EIR.
Response g:

Solid waste management is guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Los Angeles prepared a Solid Waste Management Policy Plan that was adopted by the City Council in 1994. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) AB 939, the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), City of Los Angeles Source Reduction and Recycling Plan (CiSRRE), Ordinance No. 171,687 and the Framework Element of the General Plan. The CiSWMPP, adopted in November 1994, is the City’s long-range policy plan that provides direction for solid waste management and serves as an umbrella document for the CiSRRE. Together, the CiSWMPP and CiSRRE specify goals, objectives, and programs for achieving AB 939. The General Plan Framework Element supports AB 939 and its goals and addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs. Finally, Ordinance No. 171,687 (the “Space Allocation Ordinance”) requires the provision of an adequate recycling area or room for collecting and loading recyclable materials for all new construction projects, multi-family residential projects of four or more units where the addition of floor area is 25 percent or more, and other development projects where the addition of floor area is 30 percent or more. The Project would provide clearly marked, durable, source sorted recycling bins throughout the Project Site to facilitate recycling in accordance with Ordinance No. 171,687. The Project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, impacts to regulations related to solid waste would be less than significant and no further analysis of this issue is required.

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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?

b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with
the effects of past projects, the effects of other current projects, and the effects of probable future projects).

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

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Response a:

Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to the issues addressed herein. Therefore, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts. All feasible mitigation measures will be identified to reduce the identified significant impacts.

Response b:

The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other past, current, and/or 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. Therefore, the potential for cumulative impacts related to aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards/hazardous materials, land use and planning, noise, population and housing, public services, transportation and traffic, and utilities and service systems resulting from the Project in conjunction with the applicable related projects will be analyzed and documented in the EIR. The potential for significant cumulative impacts from the other environmental issues that are not to be evaluated and documented in the EIR can be assessed at this time. These cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the Project’s incremental contribution would be less than significant. Therefore, only those aspects of the Project to be analyzed and documented in the EIR are concluded to have the potential for significant cumulative impacts.

Response c:

As discussed above, construction and operation of the Project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in the EIR.
As noted above, the lead agency has determined that the proposed project may result in a significant effect on the environment, and an environmental impact report is required.

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<td>Environmental Specialist II</td>
<td>(213) 978-1359</td>
<td>May 2017</td>
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