

# I. SUMMARY

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## A. INTRODUCTION

This summary is intended to highlight major areas of importance in the environmental analysis, for use by decision makers and the public, and to provide the information required per Section 15123 of the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*. The summary includes a discussion of the environmental review process, a description of the proposed project, requested actions from the City of Los Angeles, areas of known controversy and issues to be resolved. A summary of the potential environmental impacts that could occur as a result of the proposed project as well as alternatives to the proposed project, their level of significance, mitigation measures and level of impact after mitigation are also included in this chapter.

## B. THE ENVIRONMENTAL REVIEW PROCESS

CEQA requires that an environmental review be conducted for activities and approvals that involve discretionary actions. CEQA applies to all California government agencies at all levels, including local agencies; regional agencies; and state agencies, boards and commissions. An Environmental Impact Report (EIR) is an informational document required by CEQA when substantial evidence exists that a project may have a significant physical environmental effect. The EIR is intended to provide information to decision makers, agency staff and the public about (1) the potential environmental impacts of a proposed project, (2) ways in which the significant effects of a project might be minimized or avoided, and (3) alternatives to the project which could reduce or avoid the significant impacts associated with the project.

CEQA applies to projects for which a governmental agency can use its judgment or discretion in deciding whether to carry out or approve the project. The public agency that has the principal responsibility for carrying out or approving the project is termed the "Lead Agency." For the purpose of this EIR, the City of Los Angeles City Planning Department is the Lead Agency. This EIR will also be used by other agencies in their decision-making processes. Responsible Agencies include any public agencies, other than the Lead Agency, that have discretionary approval power over the project. Trustee Agencies are those state agencies that have jurisdiction by law over natural resources held in trust for the people of the State of California. Additionally, Reviewing Agencies includes those agencies that do not have discretionary power over the project but that are expected to review the EIR for adequacy and accuracy.

The initial steps of the environmental review process are to determine whether CEQA applies and whether an EIR is required. For this project, the City Planning Department determined that CEQA did

apply and, after review of the project indicated the possibility of significant environmental impacts, the preparation of an EIR was determined to be necessary.

As a first step of the EIR process, the lead agency distributes a Notice of Preparation (NOP). The NOP is intended to solicit input from responsible agencies and other interested parties. The City Planning Department circulated an NOP for the proposed project on July 11, 2007, beginning a 30-day review period. Written comments were received from agencies and also received from interested individuals and community groups in writing and as public statements at a scoping meeting held by the City Planning Department on July 25, 2007.

Subsequent to the NOP review period, a Draft EIR was prepared. The Draft EIR was circulated for a 46-day public review period, which exceeded by one day the 45-day review period as required by the *State CEQA Guidelines* Section 15087. The review period began on Friday, August 29, 2008 and ended on Tuesday, October 14, 2008. During this review period, the City Planning Department accepted comments from agencies and the public. After the close of the public review period, written responses were prepared to all comments received on the Draft EIR. The comments, and their respective responses, are included in **Section III, Responses to Written Comments**, of this Final EIR. These comments and responses, the Mitigation Monitoring Plan, and the text of the Draft EIR constitute the Final EIR. The Final EIR will be presented to the decision makers and must be certified as adequate and complete before any discretionary actions may be taken to implement the Wilshire and La Brea Project.

## C. DOCUMENT ORGANIZATION

This Final EIR is organized into the following four sections.

**I. Summary** presents an overview of the significant effects of the project, proposed mitigation, and alternatives.

**II. Corrections and Additions to the Draft EIR** presents revisions, corrections, and/or additions to text included in the Draft EIR.

**III. Responses to Written Comments on the Draft EIR** includes all written comments, and responses to those comments, received during the 46-day public review period on the contents in the Draft EIR.

**IV. Mitigation Monitoring Plan** contains a list of all mitigation measures with their associated responsible parties and phasing of implementation.

**Appendices** to this Final EIR include the original comments received during the 46-day public review period for the Draft EIR.

## D. BRIEF SUMMARY OF THE PROPOSED ACTION

### Project Description

The Wilshire and La Brea Project proposes a mixed-use development consisting of 562 residential units and approximately 45,000 square feet of ground-floor retail-commercial and restaurant uses. The ground-floor retail/commercial and restaurant uses would be located on Wilshire Boulevard and La Brea Avenue. Parking would be provided in a partial aboveground “mezzanine” level, in a ground level, and in a 2.5-level subterranean structure.

The proposed structure would consist of six levels of apartment dwellings atop an elevated base, which would be approximately 20 feet above street level at the Wilshire Boulevard end of the property and approximately 28 feet above street level at 8<sup>th</sup> Street. The residential floors would consist of two elements: a primary structure arranged in a “wing” configuration, which would create building “fingers” that would surround open-ended courtyards, and a smaller “bar” structure along the podium edge at Sycamore Avenue. The finger building would be six stories plus mezzanines above the podium, while the bar building would be two stories above the podium. Overall, the finger building would be a maximum of 100 feet above grade, and the bar building would be 44 feet above grade. An accent tower at the corner of Wilshire Boulevard and La Brea Avenue would be up to 130 feet above grade; the highest parts would contain equipment and provide a decorative element for the building.

### Project Construction

Construction is expected to commence in December 2009 and the project is anticipated to be ready for occupancy in 2011. The construction period for the project is anticipated to consist of four phases and last approximately 36 months. Phase I (Demolition) would involve the demolition and removal of existing on-site structures. Approximately 14,000 cubic yards (cy) of demolition materials would be generated. Demolition and removal would involve the use of standard construction equipment such as excavators and other related equipment such as haul trucks. This phase is anticipated to take two months to complete.

Phase II (Excavation/Earthwork) would involve the grading and excavation of existing on-site soils. Grading would require excavation up to depths of approximately 36 feet below ground surface at 8<sup>th</sup> Street and approximately 27 feet below ground surface at Wilshire Boulevard. It is anticipated that approximately 163,000 cy of earth material would be removed from the project site. Excavation/Earthwork activities would involve the use of standard earth-moving equipment, such as excavators, backhoes, and dump trucks, and other related heavy-duty equipment, which would be stored

on site during construction to minimize disruption of the surrounding land uses. This phase is anticipated to take four months to complete.

Phase III (Sub-Grade Construction) would involve construction of the foundations and sub-grade portions of the parking structure while Phase IV (Building Construction) would involve above-grade construction of the base building. Building activities during these two phases on a worst-case day would involve the use of standard construction equipment, including cranes, forklifts, and two backhoes. Phase III is expected to take 9 months to complete while Phase IV is expected to take 14 months to complete. There would be three months of overlap of Phase III and Phase IV.

## **E. PROJECT OBJECTIVES**

The project applicant seeks to redevelop a commercial strip mall and vacant church site in the Wilshire Community Plan Area of Los Angeles. More specifically, the objectives of the Wilshire and La Brea Project are

- to provide multi-family residential housing in an urban area of the City of Los Angeles where there is substantial demand for such housing;
- to promote the use of public transportation by providing housing, retail shopping, and dining opportunities adjacent to a major public transit corridor;
- to provide retail shopping and dining opportunities for the local community;
- to promote walkability by providing housing, retail shopping, and dining opportunities in close proximity to adjacent commercial and residential uses;
- to meet the City's green building ordinance, which will enhance the City's sustainability goals;
- to develop the site with land uses consistent with the intent of the Wilshire Community Plan and the Miracle Mile Community Design Overlay District Design Guidelines and Standards;
- to improve and integrate the streetscape along Wilshire Boulevard and La Brea Avenue;
- to provide jobs within the Wilshire Community Area of Los Angeles;
- to provide a development in the Miracle Mile District that respects the height of adjacent historic buildings; and
- to develop the site with structures that are compatible with existing residences to the east in terms of scale, mass, and bulk.

## F. ACTIONS REQUESTED

The Los Angeles Department of City Planning is acting as lead agency as defined by CEQA for environmental review of this project. Upon certification of the Draft EIR by the City of Los Angeles, a variety of discretionary and ministerial actions will be required, including, but not limited to

- General Plan Amendment for the southernmost portion of the La Brea Avenue parcel from General Commercial to Regional Center Commercial;
- Zone/Height District (HD) change from [Q] C4-2-CDO (Wilshire), C2-1 (La Brea) and [Q]C2-1 (Sycamore) to [T][Q]C4-2 on the entire site;
- vesting tract map, including the vacation of an alley;
- Zoning Administrator adjustment;
- site plan review;
- master conditional use permit (CUP) for sale of alcohol;
- building line removal along Wilshire Boulevard;
- haul route approval;
- project permit compliance under Community Design Overlay (CDO) District; and
- other approvals as necessary, including but not limited to approvals for temporary street closures.

## G. LOCATION AND BOUNDARIES

The proposed project site is located on the southeastern corner of Wilshire Boulevard and La Brea Avenue. Specifically, the site is bound by Wilshire Boulevard to the north, Sycamore Avenue to the east, 8<sup>th</sup> Street on the south, and La Brea Avenue to the west. The proposed project is located approximately 2 miles north of the Santa Monica Freeway (I-10).

## H. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Comments received from the public, responsible agencies, and interested parties on the circulated NOP and at the public scoping meeting highlighted environmental issues of concern regarding the proposed project. Review of comments received during the NOP circulation period indicated areas of controversy, such as visual resources (i.e., height and massing of the proposed structure, shadow/shadow impacts, obstruction of existing views), air quality, hazards and hazardous materials, noise, population and housing, public services (i.e., crime), transportation and traffic (i.e., vehicular access, vehicular hazards, parking, transit, freeway impacts). One additional area of controversy, related to historic resources, was

raised during the public comment period for the Draft EIR. All of the areas of controversy are addressed in this Final EIR.

## I. SUMMARY OF ENVIRONMENTAL IMPACTS

### 1. Visual Resources

#### *Project Impacts*

As discussed in Section IV.A, Visual Resources, of the Draft EIR, there are no potentially significant impacts that would result from the proposed project related to visual resources.

As determined by the Cultural Resources Technical Report prepared for the proposed project site, the existing structures do not qualify as historical resources. In addition, the buildings do not substantially contribute to the valued visual character of the area as they offer no distinct aesthetically valuable features. Therefore, no potential for significant impacts would occur with respect to the removal of visually valued features or elements in the project vicinity.

The project site and the surrounding vicinity do not include any areas of natural open space; therefore, implementation of the proposed project would not affect natural open spaces areas in the Wilshire Community Plan Area of Los Angeles, and there is no potential for significant impacts.

The Wilshire and La Brea Project site is currently zoned as [Q] C4-2-CDO along Wilshire Boulevard, C2-1 along La Brea Avenue, and [Q] C2-1 along Sycamore Avenue. As stated in Section IV.G, Land Use, of the Draft EIR, implementation of the project will require that the entire site be rezoned as a [T] [Q] C4-2 zone, which will allow up to 93 specific commercial and residential uses. Uses proposed for the Wilshire and La Brea Project, including residential, retail, restaurant, and parking uses, are allowed within the C4 zone; therefore, there is no potential for significant impacts and uses are compatible.

The proposed structure would consist of two to six levels of apartment dwellings atop an elevated base, which would be approximately 20 feet above street level at the Wilshire Boulevard end of the property and approximately 28 feet above street level at 8<sup>th</sup> Street.

The proposed building incorporates many features of the styling of two historical resources directly across the project site, the E. Clem Wilson Building on Wilshire Boulevard, and the Firestone Tire and Rubber building on 8<sup>th</sup> Street. A decorative element on the project's façade adjacent to the corner of Wilshire Boulevard and La Brea Avenue would reference the vertical decorative treatment employed on the E. Clem Wilson Building. The proposed building is several stories shorter than the E. Clem Wilson

Building; however, it draws upon many of the features from this historical precedent in its scale and massing.

On Sycamore Avenue to the east, the courtyards would open to the east to take advantage of City skyline views and to provide a more articulated building face to the adjacent residential neighborhood on Sycamore Avenue. The secondary bar building would be used, together with the flats at grade, to diminish the height of the structure as it fronts Sycamore Avenue and would provide mass, bulk, and scale that is more consistent with the residential structures located at the east side of the street.

At the corner of La Brea Avenue and 8<sup>th</sup> Street, a vertically oriented, curved corner element announces the retail space that runs the length of La Brea Avenue. This curved element breaks the otherwise continuous elevation of linear retail storefronts; it is both taller and more solid in its massing. The curved element at this corner is a contemporary interpretation of the Streamline Moderne canopy style featured at the Firestone Tire and Rubber retail store across 8<sup>th</sup> Street from this corner of the project site.

Existing buildings on the project site represent a mix of architectural styles. The church is an example of Late Modern expression combining aspects of Brutalism and International Style architecture while the commercial strip center is an example of the Art Deco style of architecture that is prevalent in the area. Furthermore, while the church building has not been substantially altered since it was originally constructed, the commercial strip center has undergone extensive alterations, thus degrading its original design. For these reasons, the buildings on the project site do not substantially contribute to the aesthetic value of the area. As such, there is no potential for significant impacts.

Implementation of the proposed project would not conflict with applicable urban design policies and guidelines outlined in the Wilshire Community Plan nor would implementation of the proposed project conflict with applicable guidelines and standards listed in the Miracle Mile CDO. Therefore, there is no potential for significant impacts with respect to conflicts with applicable guidelines and regulations.

Implementation of the project would block a majority of all views across the project site. However, the existing structures on the project site already block a majority of all views across the property. Current scenic views are either partially or fully obstructed from the project site. The proposed project also does not significantly degrade scenic views off site, and residents on the upper floors of the completed project will have enhanced views. Therefore, impacts to scenic vistas associated with the proposed project are less than significant.

Wilshire Boulevard along the northern border of the project site has been designated a Scenic Highway due to its nature as a highly urbanized high-rise corridor. Implementation of the proposed project would introduce a new base structure to the project site with two residential structures. Overall, the finger

building would be a maximum of 100 feet above grade, and the bar building would be up to 44 feet above grade. The residential structures would contribute to the expected urban visual characteristics of the existing Wilshire Boulevard Corridor skyline but would not obstruct a critical feature or interfere with its aesthetic character. Also, the new residential structures would be visible from vantage points around the project site but would not obstruct, affect, or prevent views of valued visual resources from the designated Scenic Highway. Therefore, the addition of the residential structures to the Wilshire Boulevard Corridor skyline would not result in the potential for significant impacts to scenic vistas.

Implementation of the proposed project would change the pattern of shadow cast by the sun on adjacent properties. Shadow-sensitive uses, including residences and associated recreational areas, exist across Sycamore to the east of the project site. Existing uses to the north and the west are predominately commercial and are not shadow-sensitive. The maximum shadow lengths would occur at the winter solstice. On that day, the project would cast shadows of approximately 440 feet. Morning shadows would fall across properties on the northwest side in both the winter and autumn but would not fall on any shadow-sensitive uses for 3 hours or more. Noon shadows would be cast on commercial uses to the north in both the winter and autumn. Afternoon shadows cast by the project would extend to the northeast in the winter and autumn. During the summer, shadows would be cast onto the residential uses to the east across Sycamore some time after 3:00 PM. Overall, the shadows cast onto adjacent properties would not create a significant impact because the shadows cast from the proposed project would not be cast upon shadow-sensitive uses to the east for more than 3 hours between late October and early April or more than 4 hours between early April and late October. No potential for significant impacts would occur with respect to shadowing- and shading-sensitive uses.

The lighting proposed by the proposed project adjacent to residential uses would be limited to the amount required to safely light driveways, sidewalks, and public space areas within the project. Outdoor lighting adjacent to light-sensitive residential uses would be oriented and focused onto the specific on-site location intended for illumination, such as driveways, walkways, interior courtyard areas, and public areas, and directed away from adjacent residential properties and public rights-of-way to avoid any light or glare impacts from lighting fixtures included in the project. In addition, landscape lighting would be utilized to accentuate landscape features. Some decorative lighting, such as on the corner tower or rooflines, on Wilshire Boulevard, La Brea Avenue and 8<sup>th</sup> Street, adjacent to commercial uses, may be used; however, light-sensitive uses are not located on Wilshire Boulevard and La Brea Avenue across from the project site. Given the above, the new lighting established on the site would not result in substantial increases in light or glare that would affect any light-sensitive uses on or near the site.

## *Mitigation Measures*

The following mitigation measure is intended to reduce potential nighttime illumination impacts to a less than significant level.

**MM-VR-1:** Outdoor lighting on site and adjacent to light-sensitive residential uses on Sycamore Avenue and 8<sup>th</sup> Street shall be downcast and directed toward on-site areas of the property, sidewalks surrounding the building, building entry points, driveways, and interior courtyard areas.

## *Cumulative Impacts*

Cumulative impacts could occur if “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The finger structure of the proposed project is respectful of the height and architectural style of the E. Clem Wilson Tower located to the north of the project site. In addition, the massing of the northern residential structure reflects the cornices, setbacks, and terraces that are featured on the Wilson Tower. Most of the related projects discussed in Section III, General Description of Environmental Setting, of the Draft EIR, are located sufficiently distant from the project site so as not to result in changes to the visual environment in which the project is located. Only related project numbers 26, 27, 28, and 37 are situated so as to cause a potential cumulative impact with respect to visual character or views. Related project numbers 27 (residential project at 5500 Wilshire Boulevard) and 28 (mixed use project at 5600 Wilshire Boulevard) are located within the Miracle Mile CDO and will therefore be subject to City review for compliance with the CDO’s architectural and other guidelines. Related project number 37 (residential project at 4848 Wilshire Boulevard) is subject to design review under the Park Mile Specific Plan. Related project number 26 (68-foot multi-family residential project at 5115 Wilshire Boulevard) was extensively reviewed by the City during its entitlement process. Therefore, no cumulatively considerable visual resource impacts are anticipated through implementation of the proposed project in combination with the identified related projects.

Implementation of the proposed project and related projects would introduce new high-rise and mid-rise tower buildings in the Wilshire Community Plan Area and Miracle Mile District that would contribute to the expected visual characteristics of the Wilshire Boulevard Corridor skyline. However as noted above, the project would not impact views of scenic vistas. Moreover, most of the related projects are located sufficiently distant from the project site and out of the line of sight of the project so as not to result in any cumulative impairment of views of scenic vistas. Therefore, the proposed project in conjunction with the

identified related projects would not result in a cumulatively considerable impact on the views of scenic vistas.

Implementation of the proposed project in combination with the identified related projects would change the pattern of shadow cast by the sun on properties throughout the Wilshire Community Plan Area. In the general vicinity of the proposed and related projects, shadows are already cast onto adjacent properties from the neighboring mid-rise and high-rise structures. As noted above, the proposed project would not result in a significant impact due to shade and shadows. Moreover, all of the related projects are located sufficiently distant from the project site and/or to the north of the project site so that shadows from these related projects would not shade sensitive uses in the immediate vicinity of the project site. Therefore, cumulative impacts with respect to shade and shadows would be less than significant. Each of the proposed sites corresponding to the related projects is currently located in a dense urban environment and is a source of nighttime light in the area. New light sources introduced from the proposed project in combination with the identified related projects would include additional nighttime security lighting on each project site, street lighting, and lighting in open spaces between buildings. In addition to the exterior ground-level nighttime security lighting at each project site, interior lighting associated with the proposed uses would provide an additional source of nighttime illumination from each project site. Implementation of the proposed project along with the related projects in the area would result in higher density and, generally, an incremental increase in the amount of lighting present on each site and in the Wilshire Community Plan Area. While the project may have the potential to generate lighting that could spill off the project site and adversely impact adjacent light-sensitive uses, mitigation has been identified above that would reduce the impacts to a less than significant level. Each of the related projects would be subject to the Los Angeles Municipal Code (LAMC) Section 93.0117, which limits the amount of stationary light onto off-site sensitive receptors to 2 foot-candles. Therefore, there cumulative impacts with respect to artificial light would be less than significant.

### *Adverse Effects*

No significant impacts to visual resources would result from the proposed project with implementation of mitigation; therefore, no adverse effects to visual resources in the Wilshire Community Plan Area and Miracle Mile District would be anticipated upon project implementation.

## 2. Air Quality

### *Project Impacts*

#### **Construction Related Impacts**

Demolition of the existing buildings has the potential to release asbestos fibers due to the age of the structures. Demolition activity is subject to South Coast Air Quality Management District (SCAQMD) Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. Project compliance with Rule 1403 would ensure that asbestos-containing materials would be disposed of appropriately. Compliance with the requirements of this measure would avoid a significant construction-related air quality impact in relation to demolition activities by preventing the release of asbestos emissions.

During demolition, site grading, and building construction, criteria pollutant emissions are expected to be generated. In order to minimize construction emissions of particulate matter less than 10 microns in diameter (PM<sub>10</sub>), the construction contractor is required to comply with the control measures under SCAQMD Fugitive Dust Rule 403. These measures would control fugitive dust PM<sub>10</sub> emissions and would also control emissions of particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>). The estimated release of emissions was analyzed and was found not to exceed the mass-based significance thresholds for criteria pollutants; therefore, construction emissions would result in a less than significant impact on air quality in the region. However, the SCAQMD also requires that projects evaluate the localized ambient air quality impacts due to a project's emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, nitrogen dioxide (NO<sub>2</sub>), and carbon monoxide (CO). The SCAQMD has established localized significant thresholds for these pollutants, which are based on the ambient air quality standards and the background levels in the project area as measured by SCAQMD's monitoring stations. Under the SCAQMD's *Final Localized Significance Threshold Methodology*,<sup>1</sup> estimates of on-site construction emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>, and CO were analyzed. The construction of the proposed project would cause an exceedance of the localized significance thresholds for PM<sub>10</sub> and PM<sub>2.5</sub>; however, the NO<sub>2</sub> and CO thresholds would not be exceeded. Therefore, project construction would cause temporary but significant local air quality impacts for PM<sub>10</sub> and PM<sub>2.5</sub>. Therefore, construction of the project would require the implementation of mitigation measures to reduce the localized impacts.

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<sup>1</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, (2008).

## **Operational Impacts**

Primary effects of projects on air quality are related to emissions that would be generated by both stationary and mobile sources as a result of normal day-to-day operation on the site after occupation. Stationary emissions would be generated by the consumption of natural gas for space and water heating devices, the operation of landscape maintenance equipment, and from consumer products. Mobile emissions would be generated by motor vehicles traveling to and from the project site. As listed in Section IV.B, Air Quality, of the Draft EIR, the proposed project would not generate emissions that would exceed SCAQMD thresholds during the summer or the winter. Therefore, daily operational emissions generated by the proposed project would be considered a less than significant impact.

Secondary effects of projects on air quality include interfering with the attainment of the federal or state ambient air quality standards, resulting in population increase within an area that would be in excess of that projected by the Southern California Association of Governments (SCAG), and generating vehicle trips that cause a CO hotspot or exposing sensitive receptors to a CO hotspot. The population increase resulting from implementation of the proposed project falls within SCAG projections, which are the basis for the Air Quality Management Plan (AQMP); therefore, the emissions generated from the proposed project at buildout would not interfere with the attainment plans or contribute to the exceedance of an existing air quality violation. Also, as indicated in the traffic study, the intersections analyzed for this project would operate at a level of service (LOS) below D. Intersections operating at a LOS of E or F are considered to have potential to create CO hotspots. Under worst-case conditions, future CO concentrations at each intersection would not exceed the state 1-hour and 8-hour standards with the development of the proposed project. No significant CO hotspot impacts would occur to sensitive receptors in the vicinity of these intersections. As a result, no significant project-related impacts would occur relative to future carbon monoxide concentrations.

## **Global Climate Change Impacts**

The Wilshire and La Brea Project would result in greenhouse gas (GHG) emissions due to, among other things, fuel combustion in motor vehicles and building heating systems associated with the project. Building and motor vehicle air conditioning systems may use hydrofluorocarbons (HFCs) (and hydrochlorofluorocarbons [HCFCs] and chlorofluorocarbons [CFCs] to the extent that they have not been completely phased out at later dates), which may result in emissions through leaks. The other primary GHGs (perfluorocarbons and sulfur hexafluoride) are associated with specific industrial sources and are not expected to be associated with the proposed project.

While the proposed project would result in emissions of GHGs, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. However, it is generally the case that an individual project of this size is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.<sup>2</sup> Accordingly, further discussion of the project's greenhouse gas emissions and their impact on global climate are addressed under **Cumulative Impacts**.

## *Project Mitigation Measures*

### **Construction Impacts**

Construction emissions generated by the proposed project would exceed the localized significance threshold for PM<sub>10</sub> and PM<sub>2.5</sub> during grading operations and would be considered a significant impact without mitigation.

- MM-AQ-1** In addition to the requirements of SCAQMD Rule 403, the applicant shall implement the following measures to help reduce emissions of PM<sub>10</sub> and PM<sub>2.5</sub> during construction activities.
- a. Configure construction parking to minimize traffic interference. (The emission reduction efficiency for this measure is not quantified.)
  - b. Provide temporary traffic controls during all phases of construction activities to maintain traffic flow (e.g., flag person). (The emission reduction efficiency for this measure is not quantified.)
  - c. Schedule construction activities that affect traffic flow on the arterial system to off peak hours to the degree practicable. (The emission reduction efficiency for this measure is not quantified.)
  - d. Re-route construction trucks away from congested streets. (The emission reduction efficiency for this measure is not quantified.)
  - e. Consolidate truck deliveries when possible. (The emission reduction efficiency for this measure is not quantified.)
  - f. Provide dedicated turn lanes for movement of construction trucks and equipment on and off site. (The emission reduction efficiency for this measure is not quantified.)

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<sup>2</sup> California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, (2008) 35.

- g. Maintain equipment and vehicle engines in good condition and in proper tune, as per manufacturers' specifications and per SCAQMD rules, to minimize exhaust emissions. (The emission reduction efficiency for this measure is not quantified.)
- h. Apply water to demolition materials to reduce the emissions of fugitive dust during demolition operations. (The emission reduction efficiency for this measure is not quantified.)

### Operational Impacts

Project operations would not generate emissions of any criteria pollutant in excess of the SCAQMD daily thresholds; therefore, no mitigation measures are required.

### Cumulative Impacts

### Regional Impacts

As discussed above, mass air emissions generated by the project would not exceed the thresholds of significance established by the SCAQMD during project operation, as shown in Table IV.B-13 of the Draft EIR. Thus, the proposed project's operational emissions would not have cumulatively considerable impacts to air quality. Construction emissions would not exceed any of the SCAQMD thresholds of significance for construction, but would exceed the LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>, which represent local impacts only. Also discussed in the Draft EIR, the proposed project is consistent with the population growth projections of the SCAG Growth Forecast. The control strategy of the AQMP is based on projections contained in local general plans. Projects that are consistent with local general plans are considered consistent with air quality-related regional plans such as the AQMP.<sup>3</sup> Uses and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended thresholds. According to the methodology described in the SCAQMD *CEQA Air Quality Handbook*, if an individual project reduces the rate of growth of VMT and is consistent with the AQMP, then the project's cumulative impact could be considered less than significant.<sup>4</sup>

As discussed in Section IV.B, Air Quality, of the Draft EIR, this criterion has been met and the project would be considered consistent with AQMP. Consequently, there is no potential for significant cumulative air quality impacts under this criterion.

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<sup>3</sup> *CEQA Air Quality Handbook*, 12-2.

<sup>4</sup> SCAQMD, *CEQA Air Quality Handbook* (Diamond Bar, California: SCAQMD, November 1993), 9-12.

## Global Climate Change Impacts

The GHG emissions associated with operation of the proposed project were estimated and are listed in Section IV.B, Air Quality, of the Draft EIR. Based on a conservative estimate, operation of the project would result in direct net GHG emissions of approximately 3,730 metric tons per year (0.00373 million metric tons). While the proposed project would result in emissions of GHGs, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. However, it is generally the case that an individual project of this size is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.<sup>5</sup>

No quantitative emission thresholds or similar criteria have been established to evaluate the cumulative impact of a single project on global climate, and based on the findings in Section IV.B, Air Quality, of the Draft EIR, the contribution of the project to cumulative GHG emissions would most likely not be cumulatively considerable if such a threshold were to be established. However, in the absence of an established threshold and understanding that the proposed project would result in the emission of some GHGs, the proposed project's impact will be considered cumulatively considerable. Therefore, mitigation measures to reduce GHG emissions to the extent feasible will be applied.

## *Cumulative Mitigation Measures*

### Regional Impacts

Project construction and operation would not result in cumulative impacts; therefore, no mitigation measures are required. Nonetheless, project-level mitigation measures would also reduce any level of cumulative impacts.

## Global Climate Change Impacts

Mitigation measures to reduce the cumulatively considerable effects of GHG emissions on global climate are required. With incorporation of the strategies recommended by the Climate Action Team the project will further reduce GHG emissions by creating a mixed-use development along a major transit corridor that will promote alternatives to vehicle travel and efficient delivery of services and goods. Furthermore, the inclusion of the City's green building ordinance standards into project design and implementation

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<sup>5</sup> California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, (2008) 35.

will also reduce GHG emissions. Therefore, the following mitigation measure shall be applied to reduce these emissions to the extent feasible:

In the absence of an established threshold and understanding that the proposed project would result in the emission of some GHGs, the proposed project's impact shall be cumulatively considerable. Therefore, the following mitigation measure is included to help reduce GHG emissions:

**MM-AQ-2:** The proposed project shall meet the City's Green Building Ordinance standards for all residences. Items that may be incorporated in the project identified in the City's green building ordinance include low-flow-plumbing fixtures, dual flush toilets, a cool roof, separate recycling trash chutes, and recycled content in construction materials such as carpet. The inclusion of such items as required by the Green Building Ordinance will improve the energy efficiency of the project and reduce GHG emissions associated with the project.

### *Adverse Effects*

Construction of the proposed project would generate emissions of PM<sub>10</sub> and PM<sub>2.5</sub> that exceed the localized significance thresholds. The mitigation measures listed in **MM-AQ-1** would help reduce emissions of PM<sub>10</sub> and PM<sub>2.5</sub>; however, the reductions achieved through implementation of the measures cannot be quantified. Therefore, following implementation of mitigation, construction emissions would still cause a significant impact on air quality and would be considered an unavoidable significant impact.

Project operations would not generate emissions of any criteria pollutant in excess of the SCAQMD daily thresholds. If a project's emissions are considered less than significant, no mitigation measures are required. The proposed project's operational emissions would be considered a less than significant impact on air quality in the region.

While the South Coast Air Basin is in nonattainment of the state and federal ozone (O<sub>3</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> standards, the construction and operation of project does not create individually significant air quality impacts on a regional level; based on other SCAQMD criteria, it would not contribute to cumulatively significant air quality impacts. Thus, the proposed project would have a less than significant cumulative air quality impact.

The proposed project would result in the emission of some GHGs. Since no numerical threshold has been established, the proposed project's impact shall be considered cumulatively considerable. The mitigation measure listed in **MM-AQ-2** would help reduce emissions of GHGs caused by the project; however, in the absence of an established threshold, it is not possible to determine whether the reductions achieved

through implementation of the measure will reduce such impacts to a level of insignificance. Therefore, the project's contribution to GHG emissions would still result in a cumulatively significant impact on global climate change.

### **3. Cultural Resources**

#### ***Project Impacts***

##### **Historical Resources**

A historic resources assessment was prepared for the proposed project to evaluate the potential for both direct impacts (impacts to resources on the project site) and indirect impacts (impacts to resources in the project vicinity). The Wilshire Grace Church was constructed in 1965 and was formally occupied by a bank. The Metroplaza Mall is a combination of older structures retrofitted for adaptive use and new, replacement structures. The main structure was constructed in 1945. The Wilshire Grace Church and Metroplaza mall were assessed for individual eligibility for listing in the California Register, and both were found ineligible for listing under all four criteria due to their age, architectural style, lack of association with important events or persons, and, at the Metroplaza Mall, extensive alternations. The Wilshire Grace Church was also evaluated to determine if it qualifies as a contributing resource to the Miracle Mile Historic District located west of La Brea Avenue. Due to the age and architectural style of the Wilshire Grace Church property, as well as its location east of the district boundary, it does not qualify as a contributing resource to the district. Therefore, no historic resources are present on the project site, and no direct impacts would occur as a result of project implementation.

Five historical resources in the vicinity of the project site were identified:

- E. Clem Wilson/Mutual of Omaha building at 5217 Wilshire Boulevard. This building is eligible for listing in the National Register and is listed in the California Register.
- Security Pacific Bank/Security First National Bank building at 5207–5209 Wilshire Boulevard. This building is listed in both the National and California Registers, and is a City of Los Angeles Historic-Cultural Monument.
- Firestone Tire and Repair building at 800 La Brea Avenue. This building is eligible for listing in the California Register.
- Potential Period Revival residential historic district located adjacent to the east and south sides of the project site on Sycamore Avenue and West 8<sup>th</sup> Street, respectively. This district is eligible for listing in the California Register.

- Miracle Mile Historic District situated along Wilshire Boulevard, west of La Brea Avenue and east of Burnside Avenue. This district is eligible for listing in the National Register and is listed in the California Register.

An assessment of the setting and design of the proposed project in relation to adjacent historical resources and the potential for the project to materially impair the identified historical resources due to lack of conformance with the Secretary of the Interior's Standards was performed.

The new building would not alter the setting of adjacent or nearby historical resources such that significant impacts would occur for the following reasons. While the new building would be visible from all directions, its contemporary design would be clearly differentiated, and its overall height and setbacks would be generally compatible with adjacent historic resources and existing development in the immediate surroundings of the project site. The design elements on the project's façade adjacent to the intersection of Wilshire Boulevard and La Brea Avenue would emphasize verticality and would be in keeping with the historic character of the adjacent Miracle Mile District, which was historically characterized by large buildings at primary intersections with distinctive tower elements. The pedestrian-oriented ground floor would be in keeping with other buildings on Wilshire Boulevard and La Brea Avenue. The lower scale of the project building on Sycamore Avenue would be compatible with lower-scale residential uses on that street.

The proposed street widening along 8<sup>th</sup> Street would be minimal on the south side; therefore, it would not significantly alter the setting of the Firestone Tire and Rubber building or the adjacent potential Period Revival residential historic district.

The design compatibility of the new building would be in conformance with the Secretary's Standards and, therefore, would not alter the immediate surroundings of adjacent historical resources such that significant impacts would occur for the following reasons. The new building evinces several design elements that reinforce its compatibility with adjacent historical resources, including public streets and setbacks and, on the east on Sycamore Avenue, a 15-foot-wide landscaped area that separate all historical resources from the new building, thereby reducing the effect of the additional height and mass of the project to surrounding historical resources.

An established pattern of tall buildings with distinctive tower elements characterizes the immediate commercial surroundings, and it is at the corner of Wilshire Boulevard and La Brea Avenue that the new building would rise to its highest point. Design elements on the project's façade would reference the vertical decorative treatment employed on the E. Clem Wilson Building. This corner of the building also reflects bulk and massing seen on the E. Clem Wilson Building. The proposed building is several stories

shorter than the tallest of the nearby historical resources, including the E. Clem Wilson Building; however, it draws upon many of the features from these historical precedents in its scale and massing.

On the north, west, and south facades, a scale oriented to the pedestrian is achieved through a solid building mass set against the lot lines at lower levels and a broad street-level expanse of glazed storefront. At the corner of La Brea Avenue and 8<sup>th</sup> Street, a vertically oriented, curved corner element announces the retail space that runs the length of La Brea Avenue. This curved element breaks the otherwise continuous elevation of linear retail storefronts; it is both taller and more solid in its massing. The curved element at this corner is a contemporary interpretation of the Streamline Moderne canopy style featured at the Firestone Tire and Rubber retail store across 8<sup>th</sup> Street from this corner of the project site.

On the Sycamore Avenue elevation, the scale of the existing residential pattern at street level would be replicated to complement surrounding residential historical resources. In addition, on Sycamore Avenue, a 15-foot-wide setback would allow for development of a 5,400-square-foot landscaped area along Sycamore Avenue and a 1,600-square-foot garden at the corner of Sycamore Avenue and 8<sup>th</sup> Street would provide additional transition between the height and mass of the project building and the lower-scale residential neighborhood east of the site on Sycamore Avenue.

No indirect impacts to the nearby Miracle Mile Historic District would occur due to its distance from the project site.

For these reasons, impacts to historical resources would be less than significant, and no mitigation measures are required.

### **Archaeological Resources**

No known archaeological sites exist on or adjacent to the project site, and based on the historic uses of the project site, intact human remains are unlikely to be present beneath the site. Excavation for the foundations and subterranean parking levels associated with the proposed project would cause new subsurface disturbance on the project site. As the project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed unique archeological resources exist on this site. Based on the past uses of the site, it is unlikely that intact human remains are present beneath the site. However, unanticipated discovery of unique archeological resources or intact human remains is possible. In the event of an unexpected disturbance, significant impacts to archaeological resources and human remains could occur. However, implementation of **MM-CR-1** and **MM-CR-2** would reduce potentially significant impacts to less than significant levels.

## Paleontological Resources

No unique paleontological resources or unique geologic features are known to occur on the project site; although, paleontological resources do exist throughout the City of Los Angeles. Excavation for the foundations and subterranean parking levels associated with the proposed project would cause new subsurface disturbance on the project site. As the project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed paleontological resources or unique geologic features exist in the upper levels of subsurface soil. Soils underneath the project site consist of silty clay with various amounts of silt. This soil type is not typically known to yield paleontological resources. However, unanticipated discovery of unique paleontological resources is possible. In the event of an unexpected disturbance, significant impacts to paleontological resources remains could occur. However, implementation of **MM-CR-3** would reduce these impacts to a less than significant level.

## Mitigation Measures

### Historical Resources

Impacts were determined to be less than significant; therefore, no mitigation measures are required.

### Archaeological Resources

**MM-CR-1:** If archaeological resources are uncovered on the project site during excavation, the developer must notify the Los Angeles Department of Building and Safety immediately and work must stop within a 100-foot radius until a qualified archeologist has evaluated the find. Construction activity may continue unimpeded on other portions of the project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 2103.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue.

**MM-CR-2:** If during excavation of the project site human remains are discovered, the steps described in *State CEQA Guidelines* Section 15064.5(e) shall be followed.

- (1) *There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:*
  - (A) *The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and*

- (B) *If the coroner determines the remains to be Native American:*
  - 1. *The coroner shall contact the Native American Heritage Commission within 24 hours.*
  - 2. *The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.*
  - 3. *The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or*
- (2) *Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.*
  - (A) *The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.*
  - (B) *The descendant identified fails to make a recommendation; or*
  - (C) *The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.*

### **Paleontological Resources**

**MM-CR-3:** If paleontological resources are uncovered during excavation of the project site, the City of Los Angeles Department of Building and Safety must be notified immediately and work must stop within 100 feet of the find to allow a qualified paleontologist to appropriately remove the find.

### ***Cumulative Impacts***

The related projects identified in Section III, General Description of Environmental Setting, of the Draft EIR, are located at enough of a distance from the project site not to create any potentially significant cumulative impacts to cultural resources in the vicinity of the project site. Moreover, the only related project within the Miracle Mile Historic District (related project no. 27) was extensively studied as part of the entitlement process, and the City determined that there were no historic resources on that site. Furthermore, the proposed project and the related projects within the Miracle Mile CDO will be reviewed to achieve the CDO's goal of preserving architecturally significant buildings in the Miracle Mile. Implementation of the proposed project would result in less than significant impacts on cultural resources. Therefore, the contribution of the proposed project on impacts to cultural resources in the area would not be cumulatively considerable.

## *Adverse Effects*

### **Historical Resources**

Project and cumulative impacts related to historical resources would be less than significant; therefore, no mitigation measures are required or recommended.

### **Archaeological Resources**

With implementation of the recommended mitigation measures **MM-CR-1** and **MM-CR-2**, project and cumulative impacts related to archaeological resources and human remains would be less than significant.

### **Paleontological Resources**

With implementation of the recommended mitigation measure **MM-CR-3**, project and cumulative impacts related to paleontological resources would be less than significant.

## **4. Geology**

### *Project Impacts*

As discussed in Section IV.D, *Geology*, of the Draft EIR, the proposed project is located 2.8 miles from the nearest fault (Santa Monica fault) and would comply with the California Building Code and the Los Angeles Uniform Building Code, which ensure safety in the event of an earthquake. The project site is not located within a liquefaction zone based on the California Geologic Survey hazards maps. Also the project site is not located on a slope, and, therefore, is not at a risk for landslides. Therefore, the proposed project would not result in significant impacts related to geologic hazards, such as surface fault rupture, strong seismic ground shaking, and seismic-related ground failure, including liquefaction or landslides.

The project would adhere to conditions under the National Pollution Discharge Elimination System Permit (NPDES) set forth by the Los Angeles Regional Water Quality Control Board (LARWQCB), as well as the South Coast Air Quality Management District's Rule 403, Fugitive Dust, and would prepare and submit a Storm Water Pollution Prevention Plan (SWPPP). All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70, of the Los Angeles Municipal Code, which addresses grading, excavations, and fills. Therefore, potential sedimentation and erosion impacts would be less than significant.

According to the official Flood Insurance Rate Maps from the Federal Emergency Management Agency, the project site is not located within a 100-year flood zone. Given the low chance of flooding on the project site, changes in geology due to flooding is not significant.

Groundwater beneath the project site has the potential to affect the proposed development during construction and during the life of the structure. Historical groundwater levels on the project site have been documented to be as shallow as 12 feet below the existing ground surface. Measures will be required for construction extending below the groundwater level, such as temporary dewatering or the use of drilling fluids to maintain open excavations. With adherence to one or more of these measures, geology and soil impacts associated with the proposed project during construction would be less than significant.

Concerning project operation, measures will also be required for permanent structures extending near or below the groundwater level. Such measures should be determined by the project consultants and may include permanent dewatering, waterproofing, and designing structures to resist hydrostatic pressures (including uplift). With the selection of one or more of these measures, geology and soil impacts associated with project operation would be less than significant.

The proposed project site is located on flat land in the Los Angeles area. This area is a highly urbanized area, and the project site is neither on nor near any unique or natural geologic or topographic features, such as hilltops, ridges, hill slopes, canyons, ravines, rock outcrops, water bodies, streambeds, and/or wetlands. Therefore, the project would not have a significant impact by altering landforms.

### ***Mitigation Measures***

**MM-GEO-1:** The project shall be designed and constructed in accordance with the requirements outlined in the latest edition of the California Building Code and the Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills.

**MM-GEO-2:** Prior to start of soil-disturbing activities at the site, a Notice of Intent (NOI) and SWPPP shall be prepared in accordance with, and in order to partially fulfill, the California State Water Resources Control Board Order No. 99-08-DWQ, NPDES General Permit No. CAS000002 (General Construction Permit) and Chapter 6, Article 4.4, Stormwater and Urban Runoff Pollution Control, from the Los Angeles Municipal Code. The SWPPP shall meet the applicable provisions of Sections 301 and 402 of the CWA and Chapter 6, Article 4.4, Stormwater and Urban Runoff Pollution Control, from the Los Angeles Municipal Code, by requiring controls of pollutant discharges that utilize best available

technology (BAT) economically achievable and best conventional pollutant control technology (BCT) to reduce pollutants.

**MM-GEO-3:** The project applicant shall implement dust control measures consistent with SCAQMD Rule 403, Fugitive Dust, during the construction phases of new project development. The following actions are currently recommended to implement Rule 403 and have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the source of the dust generation:

- Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days).
- Replace ground cover in disturbed areas as quickly as possible.
- Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content.
- Water active grading sites at least twice daily during construction activities.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period.
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.
- Sweep streets at the end of the day if visible soil material is carried over to adjacent roads.
- Install wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.

### ***Cumulative Impacts***

Potential geologic hazards associated with the proposed project are site-specific and do not represent a cumulative impact concern. Implementation of the proposed project and other projects in the Southern California region would cumulatively increase the number of structures and people exposed to geologic- and seismic-related hazards. As long as project design and construction occurs consistent with proper engineering practices and to the requirements of applicable portions of the California Building Code

(CBC) and Los Angeles Uniform Building Code (LAUBC) as they apply to each component of the project, seismic and regional geologic hazards would not be considered cumulatively considerable.

Grading of the proposed project would adhere to the City's Department of Building and Safety codes and requirements. Grading and geologic hazards and features not expected to have cumulative impacts as individual development projects would be required to comply with the requirements of the City's Department of Building and Safety thresholds. Compliance with the City's requirements would ensure that both individual and cumulative project impacts associated with the project's structure and grading would not exceed the identified thresholds of significance. Therefore, impacts would not be cumulatively considerable, so are considered to be less than significant.

### *Adverse Effects*

The proposed project incorporates the City's requirements pertaining to geologic hazards, including grading fill techniques and seismic safety. With the implementation of the mitigation measures recommended in the Draft EIR to mitigate potentially significant impacts associated with geologic hazards and sedimentation and erosion, no significant adverse impacts would result from the construction and operation of the proposed project.

## **5. Hazards and Hazardous Materials**

### *Project Impacts*

#### **Construction Impacts**

As described in Section IV.E, Hazards and Hazardous Materials, of the Draft EIR, reported laboratory analytical results for selected soil and/or groundwater samples collected from the project site indicated the following constituents at concentrations greater than the laboratory method detection limit (MDL): Total petroleum hydrocarbons (TPH), such as diesel (TPHd) and oil (TPHo), volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and select California Administrative Manual (CAM) 17 Metals. As a result, the consequences to people from exposure to some or all of these constituents during either construction or operation of the proposed project are potentially significant.

The identified impacts to soil and/or groundwater beneath the project site would be addressed under a site-specific independent removal action. An assessment of the potential risk to human health and the environment resulting from the identified impacts to soil and groundwater at the project site and the proposed removal action would be presented within a Draft Removal Action Workplan (RAW). The Draft

RAW would provide proposed remediation goals for each constituent of potential concern and would be submitted to the LARWQCB for review and comment prior to implementation.

Residual soil and groundwater, which may require special handling and were not addressed during the proposed independent removal action, would be addressed under a Risk Management Plan (RMP). The RMP will be implemented during construction and would present site-specific health and safety protocols and soil/groundwater handling procedures.

Mitigation measures, which require the implementation of a RAW and RMP, would reduce the risk of exposure to people during either construction or operation of the proposed project to a less than significant level.

Structures constructed or remodeled between 1930 and 1981, such as the existing church and commercial strip center, have the potential to contain asbestos-containing building materials (ACBM). In addition, the two structures were constructed prior to the ban on lead-containing paints in 1979. Construction activities, especially demolition of existing structures on the project site, could result in the release of the asbestos-containing materials (ACM), fibers, and lead-based paint dust. The presence of these materials represents a potentially significant health hazard. Recommended mitigation measures to remove and properly dispose of ACMs and lead-based paint (LBP) would reduce this impact to less than significant.

Construction of the project may result in temporary partial obstruction to adjacent roadways. The project would be required to comply with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments, as well as fire protection and security. The project applicant would comply with applicable fire department, police department, Department of Public Works (DPW), and Department of Building and Safety regulations relating to access. As a result, impacts with regard to emergency access would be less than significant.

### **Operational Impacts**

Implementation of the proposed project would not involve the use of hazardous substances with the potential for accidental release or explosion. The only known hazardous substances associated with project operations would be chemical cleaners, landscaping-related chemicals, and other common household hazardous substances. The quantities of these materials would be limited to those typically utilized in households and retail settings. The potential for accidental release and/or explosion of these substances is low, and no aspects of the project design could result in the accidental release or explosion of a hazardous substance; therefore, no potentially significant hazardous substance impacts related to the project design would occur.

A number of surrounding sites are listed in federal and state environmental databases, some with known historical leaks or hazardous conditions. However, all surrounding listed sites have been analyzed in the Phase 1 Environmental Site Assessment (ESA) relative to the proposed project and the Phase I ESA determined that the sites do not represent a recognized environmental condition to the project site due to the lack of reported violations, the remediation status, and hydraulic location of the sites. Therefore, though some sites in the vicinity of the project are listed as hazardous sites, the probable frequency and severity of consequences to the proposed project site from these sites is less than significant.

Development of the proposed project would be required to comply with all applicable community and City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire department. The project would redevelop a site that is currently developed with urban uses. As such, emergency and evacuation plans would remain similar to the current existing plans. The impact of the proposed project on emergency response and evacuation plans would be less than significant.

### **Methane Gas**

The project site is within a City Methane Zone associated with the Downtown Los Angeles oil field. Since the project site is located within a City-defined Methane Zone, the impact of methane to the project site during construction and operation is considered potentially significant, and mitigation measures are required, according to Section 91.7104.2 of the Municipal Code. Adherence to methane mitigation system requirements and mitigation measures would decrease these impacts to less than significant levels.

## ***Mitigation Measures***

### **Soil and Groundwater Contamination Mitigation**

**MM-HAZ-1:** Prior to the demolition/grading activities, contractors shall be required to have a construction worker safety plan that complies with the Occupational Safety and Health Administration (OSHA) Safety and Health Standards and shall address, as appropriate, air monitoring for sub-surface work activities, personnel protective and safety equipment, and worker training.

**MM-HAZ-2:** Identified impacts to soil and/or groundwater beneath the project site shall be addressed under a site-specific independent removal action. An assessment of the potential risk to human health and the environment resulting from the identified impacts to soil and groundwater at the project site and the proposed removal action shall be presented within a Draft Removal Action Workplan (RAW). The Draft RAW shall provide

proposed remediation goals for each constituent of potential concern and shall be submitted to the LARWQCB for review and comment prior to implementation.

**MM-HAZ-3:** Prior to excavation and/or grading the applicant shall prepare and provide to contractors a Risk Management Plan (RMP) that describes the type of contaminants and subsurface features that may be encountered at the project site and procedures for evaluating and managing such materials.

**MM-HAZ-4:** Grading and demolition contractors shall be required by construction specifications to secure approval of haul routes to export or otherwise transport off-site excavated materials prior to commencement of such activity.

**MM-HAZ-5:** Residual soil and groundwater, which may require special handling and was not addressed during the proposed independent removal action, shall be addressed under a Risk Management Plan (RMP). The RMP shall be implemented during construction and shall present site-specific health and safety protocols and soil/groundwater handling procedures.

#### **Asbestos Mitigation**

**MM-HAZ-6:** Prior to demolition, the project applicant shall comply with applicable legal requirements related to asbestos removal and demolition activities involving ACBM, including the requirements of the SCAQMD Rule 1403 for ACBMs.

#### **Lead-Based Paint Mitigation**

**MM-HAZ-7:** The project applicant shall comply with the requirements outlined by the California Occupational Safety and Health Administration (Cal/OSHA) Lead in Construction Standard, Title 8, California Code of Regulations (CCR) 1532.1 during demolition activities. Lead-contaminated debris shall be managed and disposed of in accordance with the applicable provisions of the California Health and Safety Code.

#### **Methane Mitigation**

**MM-HAZ-8:** Prior to issuance of a building permit, applicant shall comply with the City Methane Seepage Regulations, Section 91.7100 et seq. of Los Angeles Municipal Code.

**MM-HAZ-9:** Should any unrecorded oil well be found during excavation and grading, it shall be abandoned in accordance with Division of Oil, Gas, and Geothermal Resources (DOGGR)

Regulations. Prior to issuance of any building permit within a lot affected by discovery of an unrecorded oil well, the applicant shall submit a final clearance letter issued by DOGGR regarding the proper abandonment of the well(s).

### *Cumulative Impacts*

The hazardous impacts associated with a proposed project usually occur on a project-by-project basis, rather than in a cumulative nature. Because project implementation would comply with regulatory controls to abate the site-specific hazards, any potential cumulative impacts associated with the project would be decreased as the harmful substances and subsequent exposure to a health hazard would be removed from the project site. Therefore, cumulative impacts associated with the proposed project are considered to be less than significant.

### *Adverse Effects*

With implementation of the mitigation measures listed above, potential impacts related to hazards and hazardous materials would be reduced to a less than significant level.

## **6. Hydrology and Water Quality**

### *Project Impacts*

#### **Surface Water Quality**

During project construction, grading activities associated with construction could potentially result in a temporary increase in the amount of suspended solids running off the site. In the event of rainfall, construction site runoff originating from the project site could result in sheet erosion of exposed soil. Erosion of exposed soil caused by runoff could affect surface water quality in the vicinity of the project site, as well as downstream from the project site as water flows through Ballona Creek and into the Pacific Ocean. Therefore, construction-related erosion could result in a potentially significant impact to surface water quality; however, through the incorporation of recommended mitigation measures, this impact can be reduced to a less than significant level. Mitigation measures include satisfying the requirements of the NPDES and the Stormwater and Urban Runoff Pollution Control from the Los Angeles Municipal Code, which includes the preparation of a Standard Urban Stormwater Mitigation Plan (SUSMP). The SUSMP would incorporate best management practices (BMPs) by requiring controls of pollutant discharges that utilize BAT and BCT to reduce pollutants.

Concerning operation, the existing site is occupied by uses that could potentially contribute to decreased surface water quality (i.e., buildings containing lead-based paint and asbestos-containing material, and a

surface parking lot potentially containing surface oil products). While the proposed project would increase the intensity of land uses on the project site, the amount of developed area on each site would remain similar to existing conditions. Thus, it is unlikely that the proposed project would result in an increase in site runoff.

Storm water quality is generally affected by the length of time since the last rainfall, rainfall intensity, urban uses of the area and quantity of transported sediment. Typical urban water quality pollutants usually result from motor vehicle operations, oil/grease residues, fertilizer/pesticide uses, human/animal littering, careless material storage/handling, and poor property management. The majority of pollutant loads are usually washed away during the first flush of the storm occurring after the dry-season period.

Street and parking lot/garage-generated pollutants typically contain atmospheric pollution, tire-wear residues, petroleum products, oil, and grease, fertilizer and pesticide wash-offs, and industrial chemical spills, as well as animal droppings and litter types of wastes. The pollutants are washed from street surfaces by a rainfall adequate to produce sufficient runoff. The amount of pollutants washed off the street surface is a function of the amount of pollutants on street surfaces and amount of surface water flow by storm and non-storm events such as hosing down of walkways and parking garage surfaces. These pollutants have the potential to degrade water quality and may result in significant impacts. Operation of the proposed project would result in an increase in land use intensity and, thus, potentially an increase in the presence of site contaminants. All parking and building maintenance areas would be located in the subterranean parking structure. Therefore, the quantity of land devoted to uses that could result in the transport of on-site contaminants through site runoff is minimal and comparable to existing conditions. The increase in land use intensity relative to the current land uses could result in a potentially significant impact to surface water quality; however, through the incorporation of a recommended mitigation measure (MM-HYD-10), this impact could be reduced to a less than significant level.

### **Groundwater Quality**

The construction of foundations for medium-rise buildings and subterranean parking structures could have the potential to interfere with groundwater by intercepting the aquifer during excavation. The proposed project involves the construction of a high-rise building and a subterranean parking structure. The geotechnical investigation conducted for the proposed project determined that the depth of groundwater on the site is between 16 to 21 feet below the ground surface. The subterranean parking structure would be approximately 36 feet below ground surface. Therefore, excavation for the proposed project would exceed a depth of 16 to 21 feet below ground surface, and thus would encounter groundwater during project construction. Therefore, project construction could result in a significant impact to groundwater or groundwater quality.

During construction, dewatering may be required and could be achieved with temporary dewatering wells, storage tanks, and filters. Treated water would then be disposed of into the City storm drain system. Dewatering activities would require an NPDES Permit for Groundwater Discharge from the LARWQCB. This permit would ensure that water discharged into the City's storm drain system would meet all NPDES requirements for suspended solids, organic material, and other water quality parameters thereby reducing water quality impacts associated with this activity to a less than significant level.

As discussed above in **Subsection 5, Hazards and Hazardous Materials**, the groundwater beneath the project area is currently contaminated, and given the existing groundwater level, project construction activities could affect groundwater. Treated water would then be disposed of into the City storm drain system. Disposal of treated groundwater would require an NPDES Permit for Groundwater Discharge from the LARWQCB, which would ensure that water discharged into the City's storm drain system, would meet all NPDES requirements for suspended solids, organic material, and other water quality parameters. Therefore, water quality impacts associated with this activity would be reduced to a less than significant level.

Concerning operation, the existing project site consists largely of impervious surfaces. Upon implementation of the proposed project, conditions at the project site would be comparable to existing conditions, as the site would continue to be developed predominantly with impervious surfaces. Therefore, the project site does not currently allow for direct percolation within the Central Los Angeles Basin. As such, implementation of the proposed project is not expected to contribute to or result in groundwater contamination in the project vicinity, and thus there is no potential for significant impacts to groundwater resources.

As discussed above, since the project site is currently and would remain, predominantly covered by impervious surfaces, the project site would not contribute to groundwater recharge. Therefore, the project would not affect groundwater quality of existing wells. No potential for significant groundwater quality impacts would result from project implementation.

### ***Mitigation Measures***

The following mitigation measures are proposed to ensure that there are no potentially significant impacts to surface or ground water quality.

**MM-HYD-1:** Prior to start of soil-disturbing activities at the site, a NOI and SWPPP shall be prepared in accordance with, and in order to partially fulfill, the California SWRCB Order No. 99-08-DWQ, NPDES General Permit No. CAS000002 (General Construction Permit). The SWPPP shall meet the applicable provisions of Sections 301 and 402 of the Clean

Water Act and Chapter 6 Article 4.4, Storm Water and Urban Runoff Pollution Control, from the Los Angeles Municipal Code by requiring controls of pollutant discharges that utilize BAT and BCT to reduce pollutants. Examples of BAT/BCT that may be implemented during site grading and construction could include straw hay bales, straw bale inlet filters, filter barriers, and silt fences.

**MM-HYD-2:** The project applicant shall prepare and implement an SUSMP in accordance with the requirements of Chapter 6, Article 4.4, Storm Water and Urban Runoff Pollution Control, from the Los Angeles Municipal Code, to ensure that stormwater runoff is managed for water quality concerns through implementation of appropriate and applicable BMPs. Prior to issuance of any grading or building permits, the County and/or Stormwater Division of Bureau of Sanitation must approve the SUSMP.

The following is a listing of applicable BMPs that may be implemented as part of the project through the preparation of the SUSMP:

- Provide reduced-width sidewalks and incorporate landscaped buffer areas between sidewalks and streets.
- Use permeable materials for private sidewalks, driveways, parking lots, or interior roadway surfaces (e.g., hybrid lots, parking groves, permeable overflow parking, etc.).
- Where feasible, direct rooftop runoff to pervious areas such as yards, open channels, or vegetated areas, and avoid routing rooftop runoff to the roadway or the storm water conveyance system.
- Infiltration trenches
- Oil/water separators
- Catch basin inserts
- Continuous flow deflection/separation systems
- Storm drains inserts
- Media filtration
- Bioretention facility
- Dry wells
- Cisterns

- Foundation planting
- Catch basin screens
- Normal flow storage/separation systems
- Clarifiers
- Filtration systems
- Primary wastewater treatment systems

**MM-HYD-3:** The project contractor, during construction, and the project owner, during operation, shall properly store hazardous materials to prevent contact with precipitation or runoff.

**MM-HYD-4:** The project contractor, during construction, and the project owner, during operation, shall develop and maintain effective monitoring and a cleanup program for spills and leaks of hazardous materials.

**MM-HYD-5:** The project contractor, during construction, and the project owner, during operation, shall place equipment to be repaired or maintained in covered areas on a pad of absorbent material to contain leaks, spills, or small discharge.

**MM-HYD-6:** The project contractor, during construction, and the project owner, during operation, shall provide periodic and consistent removal of landscape and construction debris.

**MM-HYD-7:** The project contractor, during construction, and the project owner, during operation, shall sweep parking lots at regular, frequent intervals to remove debris. The project contractor, during construction, and the project owner, during operation, shall also remove any significant chemical residue on the project site through appropriate methods.

**MM-HYD-8:** The project owner, landscapers, and maintenance team, during project operation, landscaping, and maintenance activities, shall use non-toxic alternatives for such applications as insecticides, herbicides, rodenticides, and fertilizers. Furthermore, chemical controls shall only be applied outdoors when precipitation is not forecast for the project area.

## *Cumulative Impacts*

### **Surface Water Quality**

Development of the proposed project in combination with the list of related projects identified in Section III, General Description of Environmental Setting, of the Draft EIR, could result in the violation of water quality and/or waste discharge requirements during construction and operation. However, each of the related projects would be subject to the same requirements as the proposed project and, thus, would be required to prepare an SWPPP for construction activities. As with the project, the SWPPPs prepared for Citywide projects would incorporate BMPs by requiring controls of pollutant discharges that utilize BAT and BCT to reduce pollutants. In addition, the operation of all the related projects are required, by Chapter 13.29, Storm Water and Urban Runoff Pollution Prevention Control and SUSMP of the Los Angeles Municipal Code, to submit and then implement an SUSMP containing design features and BMPs appropriate and applicable to the project to reduce post-construction pollutants in stormwater discharges. Potential water quality impacts of the Citywide related projects in combination with the proposed project would be less than significant in light of the preparation and implementation of the SWPPP and SUSMP and the enforcement of these requirements by the City. Therefore, the proposed project has no potential to contribute to significant cumulative surface water quality impacts.

The Santa Monica Bay Watershed Management Area (WMA), within the limits of the City of Los Angeles, is composed mainly of urban uses, with remaining open spaces being devoted to uses not likely to be developed. As a result, most of the drainage system in the watershed consists of engineered storm channels and, therefore, is expected to experience little change. Additionally, as extensive development is not expected in the remaining open spaces, it is unlikely that there would be substantial alteration of drainage systems and watercourses in those areas. Because the proposed project, as well as the related projects, would be constructed on already urban-developed sites, the amount of runoff would not substantially increase, and therefore, substantial increases in erosion, siltation, flooding, and exceedance of the stormwater drainage system are not expected. Cumulatively, the project does not have the potential for significant impacts related to runoff and stormwater drainage.

Existing stormwater facilities are adequate to accommodate existing and anticipated flows. The proposed project, as well as the related projects identified in Section III, General Description of Environmental Setting, of the Draft EIR, would be located in the urbanized environment of Los Angeles. While cumulative future development may require that there be some localized modifications or additions to the existing stormwater drainage system, it is expected that these modifications or additions would not be extensive, as stormwater drainage systems already exist in the primarily impervious and urbanized area

of Downtown Los Angeles. Consequently, there is no potential for significant cumulative impacts from implementation of the proposed project in combination with the identified related projects.

From the cumulative analysis above, the proposed project is not anticipated to result in a cumulatively considerable contribution to the degradation of surface water quality in Los Angeles or the greater Los Angeles Basin.

### **Groundwater Quality**

Implementation of Citywide projects would result in additional development that could indirectly require an increased use of groundwater through the provision of potable water provided by Los Angeles Department of Water and Power (LADWP). However, the provision of water, including the increased use of groundwater supplies, as a result of the cumulative development of the proposed projects and identified related projects is within the established demand projections of the LADWP (refer to Section IV.L.1, Water, of the Draft EIR for supplementary analysis of water supplies). Groundwater to be consumed by cumulative development would be consumed according to current plans and projections by the LADWP and would not, therefore, be substantially depleted as a result of the implementation of cumulative development.

Recharge in the Los Angeles Coastal Plain consists of percolation, precipitation, and return water from irrigation. Individual basins within the Los Angeles Coastal Plan may also be replenished by the following: surface water spreading of local runoff, imported water and reclaimed water, injection of imported water (for protection against saline intrusion), and subsurface inflow from other basins. Neither the proposed projects nor any of the identified related projects would be developed within a recharge area, and, as such, cumulative impacts to groundwater recharge would be less than significant.

From the cumulative analysis above, development of the proposed project and the related projects identified in Section III, General Description of Environmental Setting, of the Draft EIR, are not expected to substantially degrade groundwater quality or have any significant cumulative effects.

### ***Adverse Effects***

With the implementation of the mitigation measures listed above, the proposed project is not expected to result in any adverse effects with regard to hydrology or water quality.

## 7. Land Use and Planning

### *Project Impacts*

As discussed in Section IV. G, Land Use, of the Draft EIR, the project site is currently occupied by a church, a commercial strip center, and paved parking areas. The paved parking areas are utilized by both the church and commercial strip center patrons. The project site is situated among retail-commercial, office, residential, and parking uses. Since the project site is an existing urban space and the proposed project would include a mixture of residential and commercial uses, the project would fit well with surrounding land uses. The proposed project would not add a new land use to the area as the project would provide a mixture of land uses, and thus, would not result in secondary impacts to surrounding uses or divide the community. Therefore, the project would complement surrounding land uses and would not divide or disrupt the existing neighborhood. Finally, there is no potential for significant secondary impacts to surrounding land uses because the project involves a mix of land uses, including residential and retail-commercial, similar to surrounding land uses. Therefore, no potential for significant land use impacts associated with disrupting or affecting the surrounding community would occur.

The proposed project would be consistent with the general plan framework's land use objectives for the Regional Center designation. The project would integrate housing with commercial uses and amenities, thereby ensuring complementary and supportive uses within the Regional Center. The density of the proposed structure has a floor area ratio (FAR) of 3.4:1. It is thereby within the recommended FAR for regional centers. Generally, regional centers will range from FAR 1.5:1 to 6:1 and are characterized by 6- to 20-story (or higher) buildings as determined in the community plan. The project's FAR would be within the range of the typical FAR for regional centers and the height of the proposed project, 7 stories, is within the range of heights typical for regional centers of 6 to 20 or more stories. In addition, land uses that are encouraged by the general plan framework on regional center properties include mixed-use projects such as the Wilshire and La Brea Project. Consequently, the project is consistent with the general plan framework policies related to the Regional Center and no significant impacts would result.

The proposed project is consistent with the goals and policies listed in the Wilshire Community Plan. However, implementation of the proposed project would require a general plan amendment to change the designation for the southernmost portion of the project site along La Brea Avenue from General Commercial to Regional Center Commercial. The amendment is required because the residential portion of the project requires a minimum residential density of 200 square feet per unit. The current R4 zone permitted by the existing C4 zone designation over the entire site (after zone change) only allows a minimum residential density of 400 square feet per unit. However, mixed-use developments located on properties designated as Regional Center Commercial, as in the case of the proposed project, can utilize

R5 development standards, which require only 200 square feet of minimum lot area for each unit. Furthermore, the City Planning Department prefers as a general policy that general plan designations remain consistent over an entire project site, whenever possible. Therefore, in order to take advantage of the residential density allowed under the R5 zone and to achieve a consistent designation across the entire site, the southernmost portion of the project site along La Brea Avenue will be re-designated with the Regional Center Commercial land use designation. With this amendment, conflicts between general plan land use designations and zoning requirements would not occur on the site and project implementation would not result in significant impacts.

The City of Los Angeles Zoning Code is a tool to implement the general plan and provides regulations to preserve public peace, health, and safety. The zoning code designates the project site as [Q] C4-2-CDO along Wilshire Boulevard, C2-1 along La Brea Avenue, and [Q] C2-1 along Sycamore Avenue, all of which permit commercial and residential uses within this zone. Uses proposed for the Wilshire and La Brea Project, including residential, commercial and parking uses, are allowed within these zones.

Height District 1 associated with the C2-1 zone along La Brea Avenue and the [Q] C2-1 along Sycamore allow a maximum FAR of 1.5:1 while Height District 2 associated with the C4-2-CDO along Wilshire Boulevard allows a maximum FAR of 6:1. As portions of the project exceed the FAR permitted under Height District 1, implementation of the project will require that the entire site be rezoned as [T][Q]C4-2.

Other approvals necessary to comply with LAMC include a Vesting Tentative Tract Map, including the vacation of an alley, a Zoning Administrator Adjustment for 0-foot yards adjacent to an alley to allow buildings to encroach on the alley prior to recordation of the final map and vacation of the alley, a building line removal along Wilshire Boulevard, site plan review, and a master conditional use permit for alcoholic beverages.

Development of the project would help implement the goals and design principals contained in the Miracle Mile Community Design Overlay District (CDO). The retail and restaurant components of the project will provide entrances located at street level. In addition, the project will provide landscaping along Sycamore Avenue and planters along Wilshire Boulevard, La Brea Avenue, and 8<sup>th</sup> Street. Consequently, the project would be consistent with the goal to encourage development that adds to a pedestrian-friendly environment.

The CDO's design guidelines and standards also identify five design principals. Concerning the principal of consistency, while modern in its forms and materials, the building is referential to its context, which features well-known Art Deco buildings, including the Wilson Tower (Samsung) located to the north of the project site across Wilshire Boulevard. The accent tower at the corner of Wilshire Boulevard and

La Brea Avenue would be up to 130 feet above grade and lower than the height of the Wilson building, which is approximately 196 feet. However, this corner of the building reflects the bulk and massing seen on the E. Clem Wilson Building. While the proposed building is several stories shorter than the tallest of the nearby historical resources, including the E. Clem Wilson Building, it draws upon many of the features from this historical precedent in its scale and massing. The curved element at the corner of Wilshire Boulevard and 8<sup>th</sup> Street is a contemporary interpretation of the Streamline Moderne canopy style featured at the Firestone Tire and Rubber retail store across 8<sup>th</sup> Street from this corner of the project site.

Concerning the principal of activity, in an effort to promote pedestrian activity, entrances to the proposed structure would be oriented towards Wilshire Boulevard and set back from the street. In addition, the sidewalks fronting the building would be textured, thus further identifying the pedestrian zone. Similarly, in order to adhere to the principal of pedestrian orientation, articulation along the lower level of the proposed structure would avoid blank surfaces and street trees along the sidewalk would provide shade.

Concerning the principal of safety, loading and parking would be located inside the building, and both of the driveways would enter and exit along less traveled streets. For example, one residential and retail entrance would be located along 8<sup>th</sup> Street while the other residential and retail entrance would be located along Sycamore Avenue. Locating the loading and parking areas and the driveways in this manner would minimize potential conflicts between pedestrians and other automobiles. As for the principal of simplicity, signage will be incorporated into the proposed building and would complement the façade. Signs directing vehicular and pedestrian traffic would also be included.

The project is, therefore, consistent with the CDO's guidelines and would not result in any significant impacts in regards to consistency with the guidelines.

Finally, several regional plans are applicable to the proposed project. As the project site is located within the jurisdiction of the SCAG, which includes Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial counties, land uses proposed by the project are governed by goals, objectives, and policies contained in the Regional Comprehensive Plan and Guide (RCPG), the 2004 Regional Transportation Plan (RTP), and the 2004 Growth Vision Report. The proposed project is consistent with all the goals, policies, and principals listed in these plans.

### ***Mitigation Measures***

The project would not result in any significant environmental impacts upon applicable land use plans or surrounding land uses; therefore, no mitigation measures are required.

### *Cumulative Impacts*

Implementation of the proposed Wilshire and La Brea Project, on its own, would not result in land use incompatibilities or plan inconsistencies; thus, no significant land use impacts would occur. In considering the proposed project's cumulative contribution, with those from the list of related projects identified in Section III, General Description of Environmental Setting, of the Draft EIR, upon City approval of the requested entitlements the proposed project, as well as the related projects, would be consistent with the City's general plan and the City's zoning code. Implementation of the proposed project and the related projects would further the goals and objectives of these plans, ultimately contributing to a revitalized, renewed, and economically and culturally diverse Wilshire Community Plan Area. Therefore, the proposed project would neither on its own, nor as a cumulative contribution to development in the greater Wilshire Community Plan Area, result in a significant cumulative impact.

### *Adverse Effects*

No significant impacts to land use would result from the proposed project; therefore, no adverse effects to land use in the Wilshire Community Plan Area would be anticipated upon project implementation.

## **8. Noise**

### *Project Impacts*

#### **Construction-Related Impacts**

As described in Section IV.H, Noise, of the Draft EIR, construction of the proposed project would result in temporary but significant and unavoidable impacts related to noise levels. Construction activities are not permitted between 9:00 PM and 7:00 AM on weekdays, 6:00 PM to 8:00 AM on Saturdays, or at any point on Sundays; as such, project construction would not exceed the ambient noise level by the threshold of 5 decibels measured on an A-weighted scale (dB(A)) or more during normal sleep hours. The closest sensitive receptors in the vicinity of the project site include multi-family residences located approximately 60 feet to the south across 8<sup>th</sup> Street and 75 feet to the east across Sycamore Avenue. If construction equipment were operating at the property line, it is possible that temporary and periodic exterior noise levels of up to 91.5 dB(A) would occur at sensitive receptor locations in the vicinity of the project site. As a result, construction activities on the project site would exceed existing ambient exterior noise levels by 5 dB(A) or more at a noise-sensitive use. Therefore, construction noise associated with the project site has the potential to result in significant impacts, and while noise from construction equipment would be minimized with the implementation of mitigation measures, noise impacts would still remain significant and unavoidable.

## Operational Impacts

The proposed project would result in permanent ambient noise level increases ranging from 0.0 to 1.2 dB(A) on surrounding roadways during the weekday. The largest project related increase of 1.2 dB(A) would occur on Sycamore between Wilshire and 8<sup>th</sup>. The following road segments would have a community noise equivalent level (CNEL) that falls under the “normally unacceptable” and “clearly unacceptable” categories: 3<sup>rd</sup> Street between La Brea and Highland, Olympic between Hauser and La Brea, Olympic between La Brea and Highland, and Highland between 3<sup>rd</sup> and Wilshire. The road segment of Highland between Wilshire and 8<sup>th</sup> would have a CNEL of 70.0 dB(A) and would fall under the “normally unacceptable” category. None of the roadway segments would result in an increase in CNEL of 3 dB(A) to or within the “normally unacceptable” or “clearly unacceptable” category, or by 5 dB(A) within “normally acceptable” or “conditionally acceptable” category. Therefore, the increase in exterior noise levels due to project-related traffic would not have the potential to result in significant impacts on uses adjacent to the roadways.

Concerning interior noise levels, with windows closed, outside to inside attenuation for buildings within California typically range from 25 to 30 dB(A). Interior noise levels within residential uses on the project site would be approximately 29.5 dB(A) to 41.3 dB(A) and, therefore, would be below the established interior noise standard of 45 dB(A). The construction standards recommended in the mitigation measures found below would ensure that on-site interior noise levels are kept below the established interior noise standard. Therefore, impacts to interior living areas on site would be less than significant.

Section IV.H, Noise, of the Draft EIR also considered parking structure noise, loading dock noise, and noise from rooftop mounted equipment during the operation of the proposed project, and found these sources of noise would not cause noise levels at off-site sensitive receptors to exceed the 5 dB(A) significance threshold.

## Mitigation Measures

### Construction Mitigation Measures

**MM-N-1:** Provide notification to the residential land uses on Sycamore Avenue and 8<sup>th</sup> Street across from the project site at least 10 days in advance of construction activities that are anticipated to result in high vibration levels, such as large bulldozers, caisson drills, and jackhammers, within 60 feet of these uses.

- MM-N-2:** Demolition, earthmoving, and other construction activities that are anticipated to result in high vibration levels, such as operation of large bulldozers, caisson drills, and jackhammers, shall, when feasible, be conducted so as not to occur concurrently.
- MM-N-3:** Select demolition methods to minimize vibration, where feasible.
- MM-N-4:** Operate earthmoving equipment on the construction sites as far away from surrounding residential uses as is feasible.
- MM-N-5:** All construction equipment shall be equipped with appropriate mufflers and be in good working condition.
- MM-N-6:** Construction noise reduction methods, such as shutting off idling equipment and maximizing the distance between construction equipment staging areas and occupied residential areas, shall be used where feasible.
- MM-N-7:** Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party.

## *Cumulative Impacts*

### **Construction Impacts**

There are 37 related projects located within the vicinity of the project site, all of which have the potential to produce construction noise impacts. Given that timing of construction activities for the related projects cannot be fully defined, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. In addition, each of the related projects would have to comply with the local noise ordinance, as well as any mitigation measures that may be incorporated pursuant to CEQA-required environmental review that would reduce construction noise for each project to the extent feasible. As such, individual construction noise impacts would only contribute to cumulative impacts when projects are in proximity to each other. The closest related project to the project site is a residential project proposed at 5500 Wilshire Boulevard, approximately 0.20 mile to the west of the proposed project. Construction of the proposed project and the proposed related residential project represents the worst-case scenario under cumulative construction impacts. The closest sensitive receptors to both projects are multi-family residences are located 75 feet to the east of the proposed project and 75 feet

southeast of the proposed related residential project. Given the proposed related residential project's distance from the project site, intervening commercial structures along Wilshire Boulevard between the project site and the proposed related residential project site and incorporation of standard construction mitigation measures, the construction of the proposed project would not contribute to cumulative noise levels in combination with the related residential project. Therefore, the proposed project's construction noise impacts would not be cumulatively considerable and would not have the potential to result in significant cumulative impacts.

### **Roadway Noise**

Cumulative noise impacts would primarily occur as a result of increased traffic on local roadways due to ambient growth and other developments in the vicinity of the project site. The traffic study conducted for the proposed project in May 2007 projected future traffic volumes based on year 2010 weekday conditions. The predicted 2010 ambient noise levels presented in the analysis with and without the proposed project are based on cumulative traffic conditions, which already take into account expected development of related projects identified in the surrounding area. Noise levels along studied roadway segments are predicted to range from 58.3 to 71.9 dB(A) as a result of cumulative traffic volumes without the proposed project. Project-related noise would result in a 1.2 dB(A) increase or less (as compared to cumulative conditions without the proposed project), which is not audible to the human ear and would not represent a cumulatively considerable increase. As a result, the project's contribution would not cause the ambient noise level measured at the property line of adjacent uses to increase by 3 dB(A) in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or by 5 dB(A) within the "normally acceptable" or "conditionally acceptable" category. Therefore, the project would not have a considerable contribution to a significant cumulative roadway noise level impact.

### ***Adverse Effects***

#### **Construction-Related Effects**

Even with implementation of mitigation measures, construction noise impacts to residences on Sycamore Avenue would be significant and unavoidable.

#### **Operational Effects**

All operational noise impacts would be less than significant.

## 9. Population and Housing

### *Project Impacts*

As discussed in Section IV. I, Population and Housing, of the Draft EIR implementation of the proposed project is consistent with population and housing growth projections and would not have the potential to significantly affect population and housing growth in the Wilshire Community Plan Area of Los Angeles. The proposed project's addition of 1,220 residents and 562 new residential units is accounted for within growth projections for the City of Los Angeles and the Wilshire Community Plan Area. The project site is already developed and served by transportation, public services, and public utilities as detailed in the Draft EIR in Section IV.K, Transportation, Section IV.J, Public Services, and Section IV.L, Public Utilities, and would not require construction or expansion of infrastructure to meet the needs of additional residential population. Therefore, the increase in population would not result in a significant impact on infrastructure to meet the needs of the additional residential population. Finally the project site is located within the Wilshire Community Plan Area, an area targeted for growth by the City of Los Angeles and numerous other projects are proposed for the surrounding area. Hence, growth in the project area is expected with or without the proposed project.

### *Cumulative Impacts*

The proposed project involves the construction of 562 new residential units within the Wilshire Community Plan Area of Los Angeles. Included in Section III, General Description of Environmental Setting, of the Draft EIR, is a list of related projects planned and/or proposed within the vicinity of this proposed project. SCAG's 2004 Regional Transportation Plan Growth Forecast Report projects that the City of Los Angeles will add 61,739 dwelling units between 2005 and 2010. The proposed Wilshire and La Brea Project and the identified related projects would collectively add approximately 4,114 dwelling units, representing an approximately 6.7 percent (4,114 dwelling units of the projected 61,739 units) contribution towards the projected dwelling unit increase for the City of Los Angeles.

Based on the 2000 Census of approximately 2.17 persons per occupied multi-family housing the number of people generated from 4,114 multi-family dwelling units is approximately 8,930 persons. The Wilshire Community Plan projects an increase in population of 22,542 persons between 2005 and 2010. Thus, the population growth from the proposed project and the related projects is within this projection.

As with the project, the related projects are situated in an area that is urbanized and contains established infrastructure. As urban infill, these projects would neither encroach on isolated or open space areas nor remove physical impediments to growth. Furthermore, these projects are in areas the City has targeted for growth and has developed transportation and other service infrastructure, as described above. As

such, the cumulative impact of the project and the related projects are accounted for within regional growth forecasts and projections and, thus, would not have a significant impact on population growth.

### *Mitigation Measures*

No mitigation measures are required because the proposed project would not result in any significant housing or population growth impacts.

### *Adverse Effects*

Implementation of the project would result in an increase in housing units and population. However, based on the above analysis of the thresholds of significance, these increases would not result in unavoidable significant impacts with respect to population or housing growth.

## **10. Public Services**

### *Police*

#### **Project Impacts**

As discussed in Section IV.J.1, Police Protection, of the Draft EIR, construction of the proposed project would result in potentially significant impacts to police services. During construction of the proposed project, a potential increase in the frequency of calls for equipment theft, trespassing, vandalism, and traffic congestion could result in an increased demand on police services. In addition, temporary lane closures on streets adjacent to the project site could also temporarily disrupt police services. However, with mitigation measures **MM-PP-1** and **MM-PP-2**, provided below, short-term significant impacts to police services during construction would be reduced to a less than significant level.

Parking facilities in the vicinity of the project site are very limited. However, construction workers will be provided with an off-street secured parking area. Therefore, impacts on police services due to the lack of sufficient parking for construction workers would be less than significant.

During project operation there would be 1,220 new residents at the project site, which would represent a 0.5 percent increase in population in the Wilshire Area Community Police Station jurisdiction over existing conditions. The Los Angeles Police Department (LAPD) has stated that a project of this size would have a moderate impact on police services in the Wilshire area. Therefore, implementation of the proposed project is expected to result in a potentially significant impact on police services.

Funding for the police department in the City of Los Angeles is derived from various types of tax revenue (e.g., property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the City's General Fund. The City Council then allocates the revenue for various public services that the City provides, including police services. As the Wilshire and La Brea Project is developed, tax revenues from property and sales taxes would be generated and deposited in the City's General Fund and the State Treasury. A portion of these revenues would then be allocated to the City's police department during the City's annual budget process to maintain staffing levels within the City of Los Angeles in numbers adequate to serve project-related increases in service call demands. This, coupled with the mitigation measures **MM-PP-3** and **MM-PP-4** provided below, would reduce long-term impacts on the LAPD's ability to provide police services during operation of the project to a less than significant level.

In addition, the project would be designed to provide security features that ensure a secure environment for project residents and employees. Secured entry and exit points, security fencing, security lighting, and other essential features would be introduced in the project. Also, as recommended through the mitigation measures listed below, prior to the issuance of building permits, the applicant would coordinate with the LAPD's Crime Prevention Unit to incorporate necessary security measures for the purpose of incorporating "defensible space" and other crime prevention features into the project. Additionally, in order to help the Wilshire Community Plan Area commanding officers during responses to emergencies, the applicant would provide a diagram demonstrating access routes to each portion of the project site. Therefore, through implementation of mitigation, the project would not result in potentially significant impacts.

### **Mitigation Measures**

**MM-PP-1:** The project applicant shall incorporate security features on the construction site, such as fencing and locked entrances; and construction equipment, tools, and materials shall be secured by locking or placing them within sheds and/or other inaccessible areas while not in use.

**MM-PP-2:** A Construction Traffic Control Plan/Management Plan shall be prepared per Los Angeles Department of Transportation (LADOT) requirements to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the vicinity of the project. In addition, access on to the project site shall remain clear and unobstructed and proposed roadway modifications shall assure adequate access to the proposed project site and adjacent areas.

**MM-PP-3:** The project applicant shall contact LAPD'S Crime Prevention Unit to incorporate appropriate crime prevention features into the project design. Examples of crime prevention design features include the following:

- Housing units can be designed so as to allow neighbors to "self-patrol" their environments.
- Lighting and landscaping may be enhanced in parking lots to improve visibility.
- Fences around housing developments can be designed in ways that avoid creating hiding places for criminals.
- Signs can be removed from storefront windows to allow clear views in and out of the store.
- Vines or planted coverings may be placed on walls to deter graffiti.

**MM-PP-4:** Upon completion of the project a diagram of each portion of the property, including access routes and any additional information that might facilitate police response, shall be submitted to the Wilshire Area commanding officer.

### **Cumulative Impacts**

The proposed project would result in an increase in both residential and commercial land uses within the Wilshire area. Additional related projects are proposed and/or planned within the project vicinity. Both the project and other planned and approved developments throughout the City could cumulatively increase the need for services from the LAPD. This demand would be met by increases in law enforcement staffing and equipment as needed, which would be funded by increased revenues from the increased tax base generated by project residents. Moreover, each project is subject to review by the LAPD to ensure that adequate access, visibility, and security is provided. Therefore, through implementation of mitigation measures, the project would not result in potentially significant impacts.

### **Adverse Effects**

With implementation of the mitigation measures listed above, there would be no adverse effects resulting from the proposed project.

## ***Fire***

### **Project Impacts**

During construction the proposed project has the potential to impact emergency access routes by obstructing roads and access routes with vehicles, trucks, and/or construction equipment. The project site is currently occupied by a church and commercial strip center, resulting in some demand for fire protection and emergency medical services. Construction of the proposed project would result in the presence of work and delivery crews on the site; therefore, the potential for an increased demand on fire and emergency medical services exists during construction due to the introduction of activities and individuals which may generate new fire and emergency medical calls. The response distance during construction would remain within the performance standard of 1.5 miles for high-density residential and neighborhood commercials listed in the Local Agency Fire Code (LAFC). As previously discussed, the closest fire station to the project site is Fire Station No. 61, which is 0.6 mile away.

Concerning operation, implementation of the Wilshire and La Brea Project would result in an increase in population in the project area. Approximately 1,220 new residents would be introduced to the project area, and approximately 135 new employees would occupy the proposed retail and commercial uses. As a result of this population increase, there would be an increase in demand for fire protection services for residential and commercial-related fire services.

The response during the operation of the proposed project would remain within the performance standard of 1.5 miles for high-density residential and neighborhood commercial developments list in the LAFC. As previously discussed, the closest fire station to the project is Fire Station 61, which is 0.6 mile away. According to the City of Los Angeles Fire Department, adequate staff, equipment, and fire protection services currently exist to meet the additional demands that would be generated through the implementation of the proposed project.

In addition, funding for the Fire Department in the City of Los Angeles is derived from various types of tax revenue (e.g., property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the City's General Fund. The City Council then allocates the revenue for various public services that the City provides, including fire protection services. As the Wilshire and La Brea Project is developed, tax revenues from property and sales taxes would be generated and deposited in the City's General Fund and the State Treasury. A portion of these revenues would then be allocated to the City's Fire Department during the City's annual budget process to maintain staffing levels within the City of Los Angeles in numbers adequate to serve project-related increases in service call demands.

According to the LADWP, there is sufficient fire flow to four adjacent fire hydrants fronting the property to meet the 4,000 gallons per minute (gpm) standard required by the Los Angeles Fire Department (LAFD) Fire Code. As for the hydrants, three of the four meet the 2.5 x 4 inch double-fire-hydrant standard as required by the LAFD Fire Code. The fourth hydrant is a 2.5 inch single and does not meet the LAFD Fire Code. Therefore, due to the fact that only three of the four fire hydrants closest to the property are up to standard for the high-density residential and neighborhood commercial developments in the LAFC, project construction will result in significant impacts to fire service, which can be mitigated to less than significant with the implementation of mitigation measure **MM-F-3**, provided below.

Therefore, implementation of the proposed project would not require additional equipment, personnel, or facilities to provide adequate fire protection to the project site. No potentially significant impacts to fire protection services would result.

### **Mitigation Measures**

- MM-F-1:** Upon completion of the project, a diagram of each portion of the property, including access routes and any additional information that might facilitate fire and emergency medical response, shall be submitted to the fire chief.
- MM-F-2:** During project construction, the contractor shall ensure that roads and alleyways remain unobstructed to provide for emergency access at all times through the use of flagmen and other standard construction practices.
- MM-F-3:** The project applicant shall coordinate with the LAFD to design and implement an upgraded fire hydrant in compliance with the LAFD Fire Code for high-density residential and neighborhood commercial developments.

### **Cumulative Impacts**

The proposed project would result in an increase in both residential and commercial land uses within the Wilshire Community Plan Area of Los Angeles. As discussed in Section III, General Description of Environmental Setting, of the Draft EIR, additional related projects are proposed and/or planned within the project vicinity. Both the project and other planned and approved developments throughout the City would cumulatively increase the need for services from the LAFD. This demand would be met by the increased tax base associated with the proposed project. Moreover, each project is subject to review by LAFD to ensure that an adequate emergency response exists and that adequate emergency site access is provided. Therefore, the project would not individually or cumulatively result in significant impacts to fire protection and emergency medical services.

## Adverse Effects

There would be no adverse effects as a result of the proposed project.

## Public Schools

### Project Impacts

As discussed in Section IV.J.3, Public Schools, of the Draft EIR, the planned three additional Los Angeles Unified School District (LAUSD) campuses to be constructed in the Local District 3, within which the project site is located, would alleviate overcrowding and ensure that the project would not result in significant impacts to schools. To further reduce any potentially significant impacts associated with the provision of school services, the project applicant is required to contribute school fees as mitigation.

Additionally, the proposed project would have the potential to alter existing bus routes during both construction and operational phases, and project construction could affect students who walk to school. However, the implementation of several of the mitigation measures would reduce these potentially significant impacts to less than significant levels.

### Mitigation Measures

- MM-SCH-1:** As authorized by Senate Bill 50, the project applicant shall pay school impact fees to the LAUSD prior to the issuance of building permits.
- MM-SCH-2:** The project applicant shall contact the LAUSD Transportation Branch at (323) 342-1400 prior to construction to coordinate school bus access during construction.
- MM-SCH-3:** The project applicant shall maintain unrestricted access for school buses during construction.
- MM-SC H-4:** The project applicant shall comply with provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.
- MM-SCH-5:** The project applicant shall not endanger passenger safety or delay student drop-off or pick-up due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.
- MM-SCH-6:** The project applicant shall maintain safe and convenient pedestrian routes to LAUSD schools that are located adjacent to the project site.

- MM-SCH-7:** The project applicant shall maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- MM-SCH-8:** The project applicant shall install appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- MM-SCH-9:** The project applicant will require that material and delivery trucks serving the project site shall not haul past affected school sites, except when school is not in session. If that is infeasible, project applicant shall require that material and deliver trucks serving the project site shall not haul during school arrival and dismissal times.
- MM-SCH-10:** The project applicant shall not stage or park construction-related vehicles, including worker-transport vehicles, adjacent to school sites.
- MM-SCH-11:** The project applicant shall provide crossing guards when the safety of students may be compromised by construction-related activities at impacted school crossings.
- MM-SCH-12:** The project applicant shall install barriers and/or fencing to secure construction equipment and the site in an effort to prevent trespassing, vandalism, and attractive nuisances.
- MM-SCH-13:** The project applicant shall provide security patrols to minimize trespassing, vandalism, and short-cut attractions.

### **Cumulative Impacts**

Though the proposed project, along with surrounding projects, would increase student enrollment, and one of the schools which serves the project site is already operating over capacity, the new school construction planned by LAUSD and required school impact fees would mitigate these cumulative impacts to less than significant levels.

### **Adverse Effects**

With the implementation of the mitigation measures listed above, construction and operation of the proposed project would not result in significant impacts to the provision of school services, affect the operation of existing schools, affect the transport of students to and from schools, or result in a

cumulatively considerable impact to LAUSD schools. Therefore, no adverse impacts would result from the proposed project.

## ***Recreation and Parks***

### **Project Impacts**

As discussed in Section IV.J.4, Recreation and Parks, of the Draft EIR, existing park facilities in the project vicinity are currently heavily used due to the deficit of public parkland and open space in the Wilshire Community Plan Area. The proposed Wilshire and La Brea Project would feature indoor club and fitness rooms, an outdoor pool and spa and open space decks. These open space and recreational amenities would provide project residents with passive recreation opportunities and an improvement to quality of life. The open space and recreational amenities would also meet the needs of the new residents that would be introduced by the proposed project as well as help reduce additional demand for public recreation facilities generated by the population increase associated with project implementation. The public open space and private recreation facilities included in the project design would not, however, meet the needs of the residents of the project for neighborhood or community parks. The increase in local population generated by the project would incrementally increase the use of existing neighborhood and community parks in the Wilshire Community Plan Area. This increase would cause a significant impact due to the acceleration of the physical deterioration of existing parks within the vicinity of the project site. Therefore, the mitigation measure discussed below would reduce the impacts to a less than significant level.

### **Mitigation Measures**

**MM-REC-1:** In accordance with the requirements of the City of Los Angeles (Ordinance No. 141422, amending Chapter 1, Article 7, of the Los Angeles Municipal Code), the project applicant shall either pay the in-lieu fee to the City and/or develop public park or recreation land on the project site using equivalent funding or greater.

### **Cumulative Impacts**

Implementation of the proposed project and the list of related projects identified in Section III, Environmental Setting, of the Draft EIR, would increase the demand for and use of existing parks and recreational facilities within the Wilshire Community Plan Area and the City of Los Angeles. Given the existing deficiency of parks and recreational facilities in the Wilshire Community Plan Area, both the individual project and the combined effects of the proposed projects in the Wilshire Community Plan Area on existing facilities is considered cumulatively significant because the use of existing facilities

would increase, thus contributing to an acceleration in the physical deterioration of these facilities. The contribution of the proposed project to this impact is cumulatively considerable; however, through implementation of the mitigation measure identified above, the project's individual contribution to the cumulatively significant impact can be mitigated to a less than significant level. Through this mitigation, adequate parkland and/or open space either on the project site, or within the vicinity of the Wilshire Community Plan Area, would be provided as a result of project implementation.

In order to accommodate the proposed development projects in the Wilshire Community Plan Area, as well as the existing deficiency in public open space, the City's Recreational and Cultural Facilities Program (RCFP) program is responsible for the acquisition and development of recreational facilities throughout the Wilshire Community Plan Area. As RCFP projects are defined and proposed, these projects will undergo CEQA review, and project-specific impacts associated with the development of each park and or recreational amenity project would be mitigated to the extent feasible. As a result, cumulative impacts associated with the construction of new recreational facilities are expected to be less than significant.

#### **Adverse Effects**

Payment of in-lieu fees to the City and/or parkland and open space dedication on the project site will reduce both project-level and cumulative impacts associated with accelerating the physical deterioration of existing parks in the Wilshire Community Plan Area. Payment of the in-lieu fees would reduce project and cumulative impacts to a less than significant level. Therefore, no adverse effects are anticipated as a result of the development of the proposed project.

#### ***Libraries***

#### **Project Impacts**

As discussed in Section IV.J.5, Libraries, of the Draft EIR implementation of the proposed project would introduce 1,220 residents to the area served by the Wilshire Branch Library. It is assumed that the 1,220 residents are new residents from outside the City limits and have not relocated from within the Los Angeles City limits. As the Wilshire Branch Library does not currently meet Los Angeles Public Library (LAPL) service standards, the addition of project-generated residents to the service area could result in a potentially significant impact. However, five other branch libraries are also located within 2 miles of the project site. As such, future residents of the project would have adequate access to additional library facilities. Therefore, the impact of the project on library services would be less than significant.

## **Mitigation Measures**

No mitigation measures are required because the proposed project would not result in any significant impacts to the LAPL system.

## **Cumulative Impacts**

As discussed in Section IV.I, of the Draft EIR the proposed project and list of related projects identified in Section III of the Draft EIR would result in the addition of 9,045 residents.

The addition of approximately 9,045 residents to the area served by the Wilshire Branch Library and other library branches through out the area would increase demand for library services in this portion of the City. It is assumed that the 9,045 residents are new residents from out of the City limits and have not relocated from within the Los Angeles City limits. This could result in a potentially significant cumulative impact to library services.

However, as the related projects are scattered in a radius of approximately 2 miles around the project site, they may also be served by other libraries, including the Wilshire Library Branch and five other branches within 2 miles of the project site. For these reasons, library resources would be sufficient to serve related projects in combination with the proposed project and, therefore, potentially significant cumulative impacts to library services would be less than significant.

## **Adverse Effects**

No significant impacts to libraries would result from the proposed project; therefore, no adverse effects to the LAPL system would be anticipated upon project implementation.

# **11. Transportation**

## ***Project Impacts***

As described in Section IV.K, Transportation, of the Draft EIR the proposed project would result in three intersections operating at LOS E or LOS F because these intersections would have a volume-to-capacity ratio (V/C) increase of greater than or equal to 0.01, during AM and/or PM peak hours, with project implementation. Therefore there would be a potential for significant impacts at these intersections without implementation of mitigation measures **MM-TRAF-1** through **MM-TRAF-3**, identified below. With implementation of these mitigation measures, impacts would be reduced to less than significant levels.

The design and landscaping of the project takes into account bicycle, pedestrian and vehicular safety such that pedestrians and bicycle access would safely be available to the project property. However, because 7 of the 16 intersections that were analyzed would operate at LOS E or F for Future with Project Traffic Conditions, there is potential for conflicts between existing vehicular traffic and bicycles and pedestrians, resulting in possible significant impacts. With implementation of these mitigation measures, impacts would be reduced to less than significant levels.

The project would generate temporary traffic during construction from construction workers, haul trucks, and delivery vehicles. A total amount of approximately 163,000 cy of earth would be removed from the project site over a 120 day period, or an average of approximately 1,358 cy per day. Assuming a haul truck capacity of 14 cy per day, this equates to approximately 97 truckloads per day, or 194 trips (one inbound and one outbound trip per load). Adjusting upward by a 3.0 per trip passenger car equivalence (PCE) to reflect the larger size and limited maneuverability of trucks as compared to cars, this equates to approximately 582 trips. The current uses on the site, which would be discontinued prior to commencement of construction, would generate 770 daily trips and 1,285 adjacent trips. Therefore, temporary traffic impacts associated with hauling would be less than significant. Nonetheless, mitigation measures **MM-TRA-4** to **MM-TRA-7** are recommended to further reduce potential impacts.

The proposed project is located within immediate access to an array of public transit opportunities; therefore, the project would not result in significant impacts to public transportation. The proposed project also would not result in significant impacts to parking availability because the proposed number of parking spaces would meet the applicable Los Angeles Municipal Code parking requirements. Finally, construction activities would not result in significant impacts to site access, pedestrian access, and closure of bus stops or loss of on-street parking.

The potential for impacts to surrounding neighborhood streets was analyzed and it was determined that potential impacts to Sycamore Avenue would be less than significant due to an average daily trip (ADT) increase that would be below the threshold established in the City's CEQA guidelines. Therefore, the traffic generated by the project would not create any significant traffic neighborhood impacts.

### ***Mitigation Measures***

**MM-TRA-1:** La Brea Avenue and Wilshire Boulevard – As a condition of approval, the project shall upgrade the traffic signal system at the intersection of La Brea Avenue and Wilshire Boulevard to Adaptive Traffic Control System (ATCS) operation.

- MM-TRA-2:** Wilshire Boulevard and Highland Avenue – As a condition of approval, the project shall upgrade the traffic signal system at the intersection of Highland Avenue and Wilshire Boulevard to Adaptive Traffic Control System (ATCS) operation.
- MM-TRA-3:** 8<sup>th</sup> Street and La Brea Avenue – As a condition of approval, the project shall widen 8<sup>th</sup> Street to 40 feet in width between La Brea Avenue and Sycamore Avenue (widen by 7 feet along the north side and by approximately 3.5 feet along the south side). The project shall also install a westbound left-turn lane on 8<sup>th</sup> Street at La Brea.
- MM-TRA-4** Prior to commencing construction, the Applicant shall prepare a Construction Management Plan, including a Worksite Traffic Control Plan that shall contain, at a minimum, the following:
- A 24-hour construction hotline that is monitored on a daily basis;
  - An up-to-date list of local police, fire and emergency response organizations and procedures for the coordination with such organizations of construction activities to reduce potential delays. Coordination shall include the assessment of alternative access routes to and from the project site that might be required due to unanticipated road conditions;
  - The location, times, and estimated duration of any roadway or sidewalk closures, traffic detours, and queuing area.
- MM-TRA-5** Flag persons shall be provided as necessary to minimize impacts on traffic flows and to ensure safe movement into and out of the project site.
- MM-TRA-6** Construction vehicles shall not be permitted to queue where they would interfere with traffic movement or block access to adjacent residences or businesses.
- MM-TRA-7** Haul trucks shall travel only on a haul route approved by the City that avoids local residential streets.

### ***Cumulative Impacts***

The April 2007 Traffic Analysis for the Wilshire and La Brea Mixed-Use Project analyzed existing (2007) and future (2010) AM and PM peak-hour traffic conditions at 16 intersections in the vicinity of the project site. The cumulative traffic conditions attributable to 37 potential related projects plus ambient growth in the surrounding area were also analyzed in this traffic analysis. Based on the analysis, the project is

expected to result in significant impacts to three intersections on its own or in combination with the 37 identified related projects; therefore, the potential exists for significant cumulative transportation impacts. However, as mitigation is proposed to reduce project related impacts to a less than significant level, the contribution of the project to these cumulative impacts would not be cumulatively considerable and is less than significant.

### *Adverse Effects*

Once the mitigation standards are applied to the proposed project, it is not expected to result in any adverse effects on transportation.

## **12. Public Utilities**

### *Water*

#### **Project Impacts**

As described in Section IV.L.1, Water, of the Draft EIR the proposed project would increase water demand. The proposed project would demand approximately 92,807 gallons of water per day or 104 acre-feet of water per year. With the inclusion of water conservation measures, water demand associated with the project represents an increase of approximately 75 acre-feet of water per year over existing conditions. This represents a relatively small fraction (approximately 0.01 percent) of the projected water demand of 683,000 acre-feet that LADWP plans to meet by 2010 under average weather conditions. Therefore, the water demand generated by the proposed project is accounted for in LADWP's projections. The Water Supply Assessment prepared by LADWP confirms that there is adequate water supply to meet the proposed project's demand. As such, implementation of the proposed project and the resulting increase in water demand in the project area would not have the potential to result in significant impacts associated with water service.

In addition, the project is located in an urban area where adequate water infrastructure exists. Therefore, adequate water infrastructure exists to serve the project, and implementation of the proposed project would not have the potential to result in significant impacts associated with existing water infrastructure and capacity.

#### **Mitigation Measures**

Implementation of the proposed project would not result in significant impacts to water supply and infrastructure; therefore, no mitigation is required.

## **Cumulative Impacts**

Development of the proposed project, in association with other projects in the area, would cumulatively increase water demand in the Wilshire Community Plan area and the Los Angeles Subregion. However, as detailed in Section IV.I, Population and Housing, of the Draft EIR the proposed development and identified related projects accounts for an approximately 6.7 percent (4,114 dwelling units of the projected 61,739 units) contribution towards the projected dwelling unit increase in SCAG's growth projections for the Los Angeles Subregion. Using SCAG's growth forecasts, LADWP has projected that there will be an adequate supply of water to accommodate anticipated growth for the next several decades. Given that the Urban Water Management Plan (UWMP) plans for water supplies to serve existing and projected needs, it is anticipated that the LADWP will be able to supply the demands of the proposed project and related projects through the foreseeable future, and no significant cumulative impacts related to water demand are anticipated. The LADWP states in the water supply assessment for the proposed project that adequate water supplies exist to meet the demands of the proposed project, as well as existing and planned future demands, and, therefore, the proposed project does not have the potential to result in potentially significant cumulative impacts on water supply.

## **Adverse Effects**

No adverse impacts associated with water supply and infrastructure are anticipated to result from development of the proposed project.

## ***Wastewater***

### **Project Impacts**

As discussed in Section IV.L.2, Wastewater, of the Draft EIR construction-related wastewater would not have a significant impact on wastewater disposal and treatment facilities due to the temporary nature of construction and expected low volumes of wastes. During project operation, the proposed project is estimated to generate 68,150 net gallons of wastewater per day or 0.068 million net gallons of wastewater per day. The Hyperion Treatment Plant (HTP) currently treats 340 million gallons per day. This would represent an increase of approximately 0.02 percent over the daily volume of wastewater treated at the HTP. As such, it is expected that the HTP has sufficient capacity to accommodate the project's wastewater, and impacts on wastewater treatment capacity would be less than significant.

The City of Los Angeles Bureau of Engineering has indicated that existing lines serving the project site appear to have enough capacity to accommodate wastewater flows generated by the proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a sewer

connection point. If local sewer lines have insufficient capacity then the developer will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. Given this requirement, impacts on sewage capacity would be less than significant.

### **Mitigation Measures**

**MM-WW-1:** If local sewer lines have insufficient capacity then the developer shall be required to build a secondary line to the nearest larger sewer line with sufficient capacity.

### **Cumulative Impacts**

Development of the proposed project and related projects would increase development intensity and wastewater generation. Several improvements to the HTP system have recently been completed that have allowed the system to treat increased wastewater flows. In addition, each new development within the City of Los Angeles is required to comply with the City's water conservation ordinances and other regulations pertaining to sewer collection and disposal. Moreover, in 2006 the City adopted the Integrated Resources Plan to meet existing and future wastewater needs in the City through 2020. Therefore, there is no potential for cumulative impacts on wastewater.

### **Adverse Effects**

With implementation of the mitigation measure listed above, no significant impacts to sewage capacity or infrastructure would result from the proposed project; therefore, no adverse effects to sewage capacity or infrastructure in the Wilshire Community Plan area would be anticipated upon project implementation.

### ***Solid Waste***

#### **Project Impacts**

As discussed in Section IV.L.3, Solid Waste, of the Draft EIR construction of the proposed project would not result in significant impacts related to solid waste. Wastes generated during demolition and construction would result in an incremental and intermittent increase in solid waste disposal at landfills and other waste disposal facilities under the jurisdiction of the City of Los Angeles. Debris would be trucked from the site for disposal at any of the 28 landfills in the area that accept and recycle construction/demolition materials. In addition there are three planned drop-off and recycling centers. Soil removed from the site during excavation would be taken to a landfill and used as cover or delivered to another job site in need of fill. Therefore, this soil would not decrease available landfill capacity. No new facilities would be required as a result of project construction. Therefore, there is no potential for significant impacts with regard to the generation of solid waste by construction activities.

Operation of the proposed project would generate a net increase of approximately 8,616 pounds per day, or about 1,574 tons per year, of solid waste. These quantities represent a worst-case scenario, with no recycling activities in place. However, the uses within the project would provide adequate areas for collecting and loading recyclable material in concert with Citywide efforts and programs to reduce the volume of solid waste entering landfills. It has been determined by the City Bureau of Sanitation that the tonnages generated by the proposed project would not have any appreciable impact on the regional solid waste system. No new solid waste facilities would be required as a result of project implementation. Therefore, there is no potential for significant impacts on solid waste from the operation of the proposed project.

Implementation of the proposed project would follow all goals set forth by the Source Reduction and Recycling Element (SRRE), City of Los Angeles Solid Waste Management Policy Plan (CiSWMMP), Framework Element and the Curbside Recycling Program, because the proposed project must be reviewed and approved by the City of Los Angeles. There are implementation programs, with which the project must comply to meet the goals contained within the SRRE and CiSWMMP. The proposed project would not have a significant impact on City waste diversion policies so long as it complies with City waste diversion programs specific to multi-residential and commercial land uses.

### **Mitigation Measures**

Implementation of the proposed project would not result in significant impacts to solid waste services; therefore, no mitigation is required.

### **Cumulative Impacts**

While in the short-term adequate landfill capacity exists to accommodate the proposed project, in the future, there is a need to develop additional landfills and other waste disposal options to accommodate future growth. These options include diversion or transformation as the preferred methods for addressing solid waste and specific and practical applications (i.e., market development, public education and public policy initiatives) within the City of Los Angeles. Solid waste haulers will continue to have flexibility to determine where solid waste is ultimately disposed of based on economic factors.

The City of Los Angeles Solid Waste Management Plan sets forth strategies that would provide adequate landfill capacity through 2020 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with the project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE. Overall, the source reduction and recycle efforts laid out in the SRRE have been extremely successful in diverting waste from area landfills.

As of 2002, the City had achieved a waste diversion rate of 63 percent, thus exceeding the state-mandated diversion goal of 50 percent by 2000 set by the California Integrated Waste Management Board (CIWMB) of 1989. The Bureau of Sanitation has developed a strong waste management infrastructure over the last decade. Through both City and private sector efforts, a myriad of innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green Mulching and Composting workshops, back yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. The City is now striving for a 70 percent diversion rate by 2020. New programs are being implemented to increase the amount of waste diverted by the City, including multi-family recycling, food waste recycling, commercial recycling, and technical assistance and support for City departments to help meet their waste reduction and recycling goals. Based on the above, it has been determined that there is no potential for significant cumulative impacts.

### **Adverse Effects**

No adverse impacts associated with solid waste are anticipated as the result of the development of the proposed project.

### ***Energy***

#### **Project Impacts**

As discussed in Section IV.L.4, *Energy*, of the Draft EIR the proposed project would not result in significant impacts to energy utilities. The estimated total electricity consumption from the proposed project is anticipated to be approximately 4,043,043 kilowatt-hours (kWh) per year. Generally the LADWP power service systems are flexible and can be readily altered to meet demand requirements. Electrical service to the project site would be provided in accordance with LADWP rules and regulations, and initial installation is not anticipated to disrupt supply to existing uses in the project area. Project design would be required to comply with Sections of the State Building Energy Efficiency Standards, contained in Title 24 of the California Code of Regulations. The LADWP has determined that the distribution system is adequate to supply the project's needs. Therefore, the proposed project would result in a less than significant impact on power consumption.

The estimated total natural gas consumption for the proposed project is anticipated to be approximately 46,514,760 cubic feet per year. According to the Gas Company, the existing system will be able to meet the proposed project's load based on the above assumptions. The system can also be modified to meet loads that are much higher than the projected gas consumption by the proposed project, as The Gas Company will make improvements to their system to meet customer obligations if needed. Therefore, the proposed project would not result in significant impacts to gas service.

Energy and gas infrastructure currently exists throughout the project area. The proposed project is consistent with planning and growth projections for both the Wilshire Community Plan Area and the greater Los Angeles area. Additionally, implementation of the proposed project would not result in the need for additional off-site infrastructure in order to provide needed energy and natural gas supplies. As such, no infrastructure, beyond that already in place and/or planned for by LADWP and the Gas Company, is required to accommodate the proposed project. Therefore, no potential for significant impacts exists relative to energy infrastructure.

### **Mitigation Measures**

Implementation of the proposed project would not result in significant impacts to electricity or natural gas service; therefore, no mitigation is required.

### **Cumulative Impacts**

The proposed project in combination with the related projects would cause an additional electricity demand estimated at 35,998,438 kilowatt-hours of electricity per year. Based on this increase in demand, LADWP has indicated that the cumulative effects of the project and other added loads would require near term and/or future additions to distribution system capacity. In accordance with current building codes and conservation standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. Compliance with Title 24 energy standards and other energy conservation programs on the local level would further reduce cumulative energy demands. Therefore, implementation of the proposed project in combination with related projects would not result in cumulative significant impact to energy supplies or the energy distribution system, and the contribution of the project to the impact would not be cumulatively considerable.

The proposed project and related projects would demand additional 29,506,250 cubic feet of natural gas per month. As previously indicated the distribution system in the project area is flexible and can be modified to provide adequate supply to meet increased demand as a result of cumulative projects. Each project would also be required to incorporate applicable energy conservation features into its design. As such, implementation of the proposed project in combination with related projects would not result in cumulative significant impact to natural gas supplies, and the contribution of the project to the impact would not be cumulatively considerable.

### **Adverse Effects**

No adverse impacts associated with electricity and natural gas service are anticipated as the result of the development of the proposed project.

**Table I-1  
Summary of Impacts**

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT</b>		
<b>1. Agriculture Resources</b>		
<p>The project site is located in an urbanized area and has been previously developed with urban, non-agricultural uses. The project site is within an area designated as Urban and Built-Up Land on the State Important Farmland Maps prepared by the State Department of Conservation. Additionally, the project site is currently zoned C2, Commercial, and C4, Commercial. This zoning classification is neither intended for agriculture uses nor is the site under a Williamson Act contract. Therefore, no impacts associated with agricultural resources would occur.</p>	<p>No measures required or recommended.</p>	<p>Less Than Significant</p>
<b>2. Biological Resources</b>		
<p>The project site is located in an urbanized area of the City of Los Angeles and the entire site is currently covered with buildings or pavement. The site is not known to contain any threatened, endangered, or rare species or their habitats; locally designated species or natural communities; wetland habitats; or wildlife corridors. The site is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan. The site is neither within nor proximate to any Significant Ecological Area, Land Trust, or Conservation Plan. Therefore, no impacts would occur to biological resources.</p>	<p>No measures required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT (continued)</b>		
<b>3. Mineral Resources</b>		
<p>The project site is located in an area where urban development has already occurred. The Wilshire Community Plan does not indicate an important mineral resource on or near the site. Therefore, no impact associated with mineral resources would occur.</p>	<p>No measures required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS</b>		
<b>1. Views</b>		
<p>The existing structures do not qualify as historical resources nor do they substantially contribute to the valued visual character of the area as they offer no distinct aesthetically valuable features. Therefore, no potential for significant impacts would occur with respect to the removal of visually valued features or elements in the project vicinity.</p> <p>The project site and the surrounding vicinity do not include any areas of natural open space; therefore, implementation of the proposed project would not affect natural open spaces areas in the Wilshire Community Plan Area of Los Angeles, and there is no potential for significant impacts.</p> <p>The Wilshire and La Brea Project site is currently zoned as [Q] C4-2-CDO along Wilshire Boulevard, C2-1 along La Brea Avenue, and [Q] C2-1 along Sycamore Avenue. Implementation of the project will require that the entire site be rezoned as a [T] [Q] C4-2 zone, which allows for the uses proposed for the Wilshire and La Brea Project.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>1. Views (continued)</b>		
<p>The proposed structure would consist of two to six levels of apartment dwellings atop an elevated base, which would be approximately 20 feet above street level at the Wilshire Boulevard end of the property and approximately 28 feet above street level at 8<sup>th</sup> Street. The proposed building incorporates many features of the styling of two historical resources directly across the project site, the E. Clem Wilson Building on Wilshire Boulevard, and the Firestone Tire and Rubber building on 8<sup>th</sup> Street. The proposed building would draw upon the many of the features of the E. Clem Wilson Building.</p> <p>On Sycamore Avenue to the east, the courtyards would open to the east to take advantage of City skyline views and to provide a more articulated building face to the adjacent residential neighborhood on Sycamore Avenue. The secondary bar building would be used, together with the flats at grade, to diminish the height of the structure as it fronts Sycamore Avenue and would provide mass, bulk, and scale that is more consistent with the residential structures located at the east side of the street. At the corner of La Brea Avenue and 8<sup>th</sup> Street, a vertically oriented, curved corner element announces the retail space that runs the length of La Brea Avenue. This curved element breaks the otherwise continuous elevation of linear retail storefronts; it is both taller and more solid in its massing. The curved element at this corner is a contemporary interpretation of the Streamline Moderne canopy style featured at the Firestone Tire and Rubber retail store across 8<sup>th</sup> Street from this corner of the project site.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>1. Views (continued)</b>		
<p>Existing buildings on the project site represent a mix of architectural styles. The church is an example of Late Modern expression combining aspects of Brutalism and International Style architecture while the commercial strip center is an example of the Art Deco style of architecture that is prevalent in the area. However, the commercial strip center has undergone extensive alterations, thus degrading its original design. For these reasons, the buildings on the project site do not substantially contribute to the aesthetic value of the area. As such, there is no potential for significant impacts.</p> <p>Implementation of the proposed project would not conflict with applicable urban design policies and guidelines outlined in the Wilshire Community Plan nor would implementation of the proposed project conflict with applicable guidelines and standards listed in the Miracle Mile CDO.</p> <p>Implementation of the project would block a majority of all views across the project site. However, the existing structures on the project site already block a majority of all views across the property. The proposed project does not significantly degrade scenic views off site, and residents on the upper floors of the completed project will have enhanced views.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>1. Views (continued)</b>		
<p>Wilshire Boulevard along the northern border of the project site has been a Scenic Highway due to its nature as a highly urbanized high-rise corridor. Implementation of the proposed project would introduce a new base structure to the project site with two residential structures. The residential structures would contribute to the expected urban visual characteristics of the existing Wilshire Boulevard Corridor skyline but would not obstruct a critical feature or interfere with its aesthetic character. Also, the new residential structures would be visible from vantage points around the project site but would not obstruct, affect, or prevent views of valued visual resources from the designated Scenic Highway. Impacts would be less than significant.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>2. Shade and Shadow</b>		
<p>The maximum shadow lengths would occur at the winter solstice. On that day, the project would cast shadows of approximately 440 feet. Morning shadows would fall across properties on the northwest side in both the winter and autumn but would not fall on any shadow-sensitive uses for 3 hours or more. Noon shadows would be cast on commercial uses to the north in both the winter and autumn. Afternoon shadows cast by the project would extend to the northeast in the winter and autumn. During the summer, shadows would be cast onto the residential uses to the east across Sycamore some time after 3:00 PM. Overall, the shadows cast onto adjacent properties would not create a significant impact because the shadows cast from the proposed project would not be cast upon shadow-sensitive uses to the east for more than 3 hours between late October and early April or more than 4 hours between early April and late October. Impacts would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>3. Light and Glare</b>		
<p>Outdoor lighting adjacent to light-sensitive residential uses would be oriented and focused onto the specific on-site location intended for illumination, such as driveways, walkways, interior courtyard areas, and public areas, and directed away from adjacent residential properties and public rights-of-way to avoid any light or glare impacts from lighting fixtures included in the project. In addition, landscape lighting would be utilized to accentuate landscape features. Some decorative lighting, such as on the corner tower or rooflines, on Wilshire Boulevard, La Brea Avenue and 8<sup>th</sup> Street, adjacent to commercial uses, may be used; however, light-sensitive uses are not located on Wilshire Boulevard and La Brea Avenue across from the project site. With implementation of the recommended mitigation measure, impacts would be less than significant.</p>	<p><b>MM-VR-1:</b> Outdoor lighting on site and adjacent to light-sensitive residential uses on Sycamore Avenue and 8<sup>th</sup> Street shall be downcast and directed toward on-site areas of the property, sidewalks surrounding the building, building entry points, driveways, and interior courtyard areas.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>4. Cumulative Impacts</b>		
<i>Views</i>		
<p>The finger structure of the proposed project is respectful of the height and architectural style of the E. Clem Wilson Tower located to the north of the project site. In addition, the massing of the northern residential structure reflects the cornices, setbacks, and terraces that are featured on the Wilson Tower. Most of the related projects are located sufficiently distant from the project site so as not to result in changes to the visual environment in which the project is located. Only related project numbers 26, 27, 28, and 37 are situated so as to cause a potential cumulative impact with respect to visual character or views. Related project numbers 27 and 28 are located within the Miracle Mile CDO and will therefore be subject to City review for compliance with the CDO's architectural and other guidelines. Related project number 37 is subject to design review under the Park Mile Specific Plan. Related project number 26 is a 68-foot multi-family residential project that was extensively reviewed by the City during its entitlement process.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>4. Cumulative Impacts (continued)</b>		
<i>Views (continued)</i>		
<p>Implementation of the proposed project and related projects would introduce new high-rise and mid-rise tower buildings in the Wilshire Community Plan Area and Miracle Mile District that would contribute to the expected visual characteristics of the Wilshire Boulevard Corridor skyline. However as noted above, the project would not impact views of scenic vistas. Moreover, most of the related projects are located sufficiently distant from the project site and out of the line of sight of the project so as not to result in any cumulative impairment of views of scenic vistas. Therefore, the proposed project in conjunction with the identified related projects would not result in a cumulatively considerable impacts.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>4. Cumulative Impacts (continued)</b>		
<i>Shade and Shadow</i>		
<p>In the general vicinity of the proposed and related projects, shadows are already cast onto adjacent properties from the neighboring mid-rise and high-rise structures. The proposed project would not result in a significant impact due to shade and shadows. Moreover, all of the related projects are located sufficiently distant from the project site and/or to the north of the project site so that shadows from these related projects would not shade sensitive uses in the immediate vicinity of the project site. Therefore, cumulative impacts with respect to shade and shadows would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>B. AESTHETICS (continued)</b>		
<b>4. Cumulative Impacts (continued)</b>		
<i>Light and Glare</i>		
<p>Each of the proposed sites corresponding to the related projects is currently located in a dense urban environment and is a source of nighttime light in the area. New light sources introduced from the proposed project in combination with the identified related projects would include additional nighttime security lighting on each project site, street lighting, and lighting in open spaces between buildings. In addition, interior lighting associated with the proposed uses would provide an additional source of nighttime illumination from each project site. Implementation of the proposed project and the related projects would result in higher density and, generally, an incremental increase in the amount of lighting present on each site and in the Wilshire Community Plan Area. While the project may have the potential to generate lighting that could spill off the project site and adversely impact adjacent light-sensitive uses, mitigation has been identified above that would reduce the impacts to a less than significant level. Each of the related projects would be subject to LAMC Section 93.0117, which limits the amount of stationary light onto off-site sensitive receptors to 2 foot-candles. Therefore, there cumulative impacts would be less than significant.</p>	<p>See mitigation measure <b>MM-VR-1</b>.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>C. AIR QUALITY</b>		
<b>1. Short-Term Construction Impacts</b>		
<p>Demolition of the existing buildings has the potential to release asbestos fibers due to the age of the structures. Demolition activity is subject to South Coast Air Quality Management District (SCAQMD) Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. Project compliance with Rule 1403 would ensure that asbestos-containing materials would be disposed of appropriately.</p> <p>During demolition, site grading, and building construction, criteria pollutant emissions are expected to be generated. In order to minimize construction emissions of particulate matter less than 10 microns in diameter (PM<sub>10</sub>), the construction contractor is required to comply with the control measures under SCAQMD Fugitive Dust Rule 403. These measures would control fugitive dust PM<sub>10</sub> emissions and would also control emissions of particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>). The estimated release of emissions was analyzed and was found not to exceed the mass-based significance thresholds for criteria pollutants; therefore, construction emissions would result in a less than significant impact on air quality in the region. However, the SCAQMD also requires that projects evaluate the localized ambient air quality impacts due to a project's emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, nitrogen dioxide (NO<sub>2</sub>), and carbon monoxide (CO).</p>	<p><b>MM-AQ-1</b> In addition to the requirements of SCAQMD Rule 403, the applicant shall implement the following measures to help reduce emissions of PM<sub>10</sub> and PM<sub>2.5</sub> during construction activities.</p> <ul style="list-style-type: none"> <li>a. Configure construction parking to minimize traffic interference. (The emission reduction efficiency for this measure is not quantified.)</li> <li>b. Provide temporary traffic controls during all phases of construction activities to maintain traffic flow (e.g., flag person). (The emission reduction efficiency for this measure is not quantified.)</li> <li>c. Schedule construction activities that affect traffic flow on the arterial system to off peak hours to the degree practicable. (The emission reduction efficiency for this measure is not quantified.)</li> <li>d. Re-route construction trucks away from congested streets. (The emission reduction efficiency for this measure is not quantified.)</li> <li>e. Consolidate truck deliveries when possible. (The emission reduction efficiency for this measure is not quantified.)</li> <li>f. Provide dedicated turn lanes for movement of construction trucks and equipment on and off site. (The emission reduction efficiency for this measure is not quantified.)</li> </ul>	<p>Significant and Unavoidable.</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>C. AIR QUALITY (continued)</b>		
<b>1. Short-Term Construction Impacts (continued)</b>		
	<p><b>MM-AQ-1 (continued)</b></p> <ul style="list-style-type: none"> <li data-bbox="1087 505 1673 691">g. Maintain equipment and vehicle engines in good condition and in proper tune, as per manufacturers' specifications and per SCAQMD rules, to minimize exhaust emissions. (The emission reduction efficiency for this measure is not quantified.)</li> <li data-bbox="1087 708 1673 862">h. Apply water to demolition materials to reduce the emissions of fugitive dust during demolition operations. (The emission reduction efficiency for this measure is not quantified.)</li> </ul>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>C. AIR QUALITY (continued)</b>		
<b>2. Localized Significance Thresholds (LST) – Construction</b>		
<p>The SCAQMD has established localized significant thresholds for pollutants, which are based on the ambient air quality standards and the background levels in the project area as measured by SCAQMD’s monitoring stations. Under the SCAQMD’s <i>Final Localized Significance Threshold Methodology</i>,<sup>6</sup> the construction of the proposed project would cause an exceedance of SCAQMD’s <i>Final Localized Significance Threshold</i> for PM<sub>10</sub> and PM<sub>2.5</sub>; however, the NO<sub>2</sub> and CO thresholds would not be exceeded. Therefore, project construction would cause temporary but significant local air quality impacts for PM<sub>10</sub> and PM<sub>2.5</sub>. Therefore, construction of the project would require the implementation of mitigation measures to reduce the localized impacts.</p>	<p>See mitigation measure <b>MM-AQ-1</b>.</p>	<p>Significant and Unavoidable.</p>
<b>3. Criteria Pollutants – Operations</b>		
<p>The proposed project would not generate emissions that would exceed SCAQMD thresholds for volatile organic compounds (VOC), NO<sub>x</sub>, carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), PM<sub>10</sub>, or PM<sub>2.5</sub> during the summer or the winter. Therefore, daily operational emissions generated by the proposed project would be considered a less than significant impact.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

<sup>6</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, (2008).

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>C. AIR QUALITY (continued)</b>		
<b>4. Localized Carbon Monoxide Emissions – Operations</b>		
Under worst-case conditions, future CO concentrations at each intersection would not exceed the state 1-hour and 8-hour standards with the development of the proposed project. No significant CO hotspot impacts would occur to sensitive receptors in the vicinity of these intersections. As a result, no significant project-related impacts would occur relative to future carbon monoxide concentrations.	None required or recommended.	Less Than Significant
<b>5. Consistency with SCAG AQMP Population Projections</b>		
The population increase resulting from implementation of the proposed project falls within SCAG projections, which are the basis for the AQMP; therefore, the emissions generated from the proposed project at buildout would not interfere with the attainment plans or contribute to the exceedance of an existing air quality violation.	None required or recommended.	Less Than Significant
<b>6. Hazardous Materials</b>		
The project will not have hazardous materials on the site and would not be a source of toxic air contaminants regulated by the SCAQMD, state, or federal government. Therefore, no significant impacts are anticipated with respect to toxic air contaminants.	None required or recommended.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>C. AIR QUALITY (continued)</b>		
<b>7. Global Climate Change Impacts</b>		
<p>The Wilshire and La Brea Project would result in greenhouse gas (GHG) emissions due to, among other things, fuel combustion in motor vehicles and building heating systems associated with the project. Building and motor vehicle air conditioning systems may use hydrofluorocarbons (HFCs) (and hydrochlorofluorocarbons [HCFCs] and chlorofluorocarbons [CFCs] to the extent that they have not been completely phased out at later dates), which may result in emissions through leaks. The other primary GHGs (perfluorocarbons and sulfur hexafluoride) are associated with specific industrial sources and are not expected to be associated with the proposed project.</p> <p>While the proposed project would result in emissions of GHGs, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. However, it is generally the case that an individual project of this size is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.<sup>7</sup></p>	None required or recommended.	Less Than Significant

<sup>7</sup> California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, (2008) 35.

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>C. AIR QUALITY (continued)</b>		
<b>8. Cumulative</b>		
<i>Regional Impacts</i>		
<p>Mass air emissions generated by the project would not exceed the thresholds of significance established by the SCAQMD during project. Thus, the proposed project's operational emissions would not have cumulatively considerable impacts to air quality. Construction emissions would not exceed any of the SCAQMD thresholds of significance for construction, but would exceed the LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>, which represent local impacts only. Also discussed in the Draft EIR, the proposed project is consistent with the population growth projections of the SCAG Growth Forecast. The control strategy of the AQMP is based on projections contained in local general plans. Projects that are consistent with local general plans are considered consistent with air quality-related regional plans such as the AQMP.<sup>8</sup> Uses and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended thresholds. According to the methodology described in the SCAQMD <i>CEQA Air Quality Handbook</i>, if an individual project reduces the rate of growth of VMT and is consistent with the AQMP, then the project's cumulative impact could be considered less than significant.<sup>9</sup></p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

8 CEQA Air Quality Handbook 12-2

Project Impacts	Mitigation Measures	Significance After Mitigation
C. AIR QUALITY (continued)		
8. Cumulative (continued)		
<i>Regional Impacts (continued)</i>		
This criterion has been met and the project would be considered consistent with AQMP. Consequently, there is no potential for significant cumulative air quality impacts under this criterion.		

9 SCAQMD, CEQA Air Quality Handbook (Diamond Bar, California: SCAQMD, November 1993), 9-12.

Project Impacts	Mitigation Measures	Significance After Mitigation
C. AIR QUALITY (continued)		
<i>Global Climate Change Impacts</i>		
<p>The GHG emissions associated with operation of the proposed project were estimated and are listed in Section IV.B, Air Quality, of the Draft EIR. Based on a conservative estimate, operation of the project would result in direct net GHG emissions of approximately 3,730 metric tons per year (0.00373 million metric tons). While the proposed project would result in emissions of GHGs, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. However, it is generally the case that an individual project of this size is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.<sup>10</sup></p>	<p><b>MM-AQ-2:</b> The proposed project shall meet the City's Green Building Ordinance standards for all residences. Items that may be incorporated in the project identified in the City's green building ordinance include low flow-plumbing fixtures, dual flush toilets, a cool roof, separate recycling trash chutes, and recycled content in construction materials such as carpet. The inclusion of such items as required by the Green Building Ordinance will improve the energy efficiency of the project and reduce GHG emissions associated with the project.</p>	<p>Significant and Unavoidable</p>

<sup>10</sup> California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, (2008) 35.

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>C. AIR QUALITY (continued)</b>		
<i>Global Climate Change Impacts (continued)</i>		
<p>Based on the findings in Section IV.B, Air Quality, of the Draft EIR, the contribution of the project to cumulative GHG emissions would most likely not be cumulatively considerable if such a threshold were to be established. However, in the absence of an established threshold and understanding that the proposed project would result in the emission of some GHGs, the proposed project's impact will be considered cumulatively considerable. Therefore, mitigation measures to reduce GHG emissions to the extent feasible will be applied.</p>		
<b>D. CULTURAL RESOURCES</b>		
<b>1. Historical Resources</b>		
<p>The Wilshire Grace Church was constructed in 1965 and was formally occupied by a bank. The Metroplaza Mall is a combination of older structures retrofitted for adaptive use and new, replacement structures. The main structure was constructed in 1945. The Wilshire Grace Church and Metroplaza mall were assessed for individual eligibility for listing in the California Register, and both were found ineligible for listing under all four criteria. Due to the age and architectural style of the Wilshire Grace Church property, as well as its location east of the district boundary, it does not qualify as a contributing resource to the Miracle Mile Historic District. Therefore, no historic resources are present on the project site.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>1. Historical Resources (continued)</b>		
<p>Five historical resources in the vicinity of the project site were identified:</p> <ul style="list-style-type: none"> <li>• E. Clem Wilson/Mutual of Omaha building at 5217 Wilshire Boulevard. This building is eligible for listing in the National Register and is listed in the California Register.</li> <li>• Security Pacific Bank/Security First National Bank building at 5207–5209 Wilshire Boulevard. This building is listed in both the National and California Registers, and is a City of Los Angeles Historic-Cultural Monument.</li> <li>• Firestone Tire and Repair building at 800 La Brea Avenue. This building is eligible for listing in the California Register.</li> <li>• Potential Period Revival residential historic district located adjacent to the east and south sides of the project site on Sycamore Avenue and West 8<sup>th</sup> Street, respectively. This district is eligible for listing in the California Register.</li> <li>• Miracle Mile Historic District situated along Wilshire Boulevard, west of La Brea Avenue and east of Burnside Avenue. This district is eligible for listing in the National Register and is listed in the California Register.</li> </ul>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>1. Historical Resources (continued)</b>		
<p>An assessment of the proposed project in conformance with the Secretary of the Interior’s Standards was performed. The new building would not alter the setting of adjacent or nearby historical resources such that significant impacts would occur for the following reasons. While the new building would be visible from all directions, its contemporary design would be clearly differentiated, and its overall height and setbacks would be generally compatible with adjacent historic resources and existing development in the immediate surroundings of the project site. The design elements on the project’s façade adjacent to the intersection of Wilshire Boulevard and La Brea Avenue would be in keeping with the historic character of the adjacent Miracle Mile District. The lower scale of the project building on Sycamore Avenue would be compatible with lower-scale residential uses on that street.</p> <p>The proposed street widening along 8<sup>th</sup> Street would be minimal on the south side; therefore, it would not significantly alter the setting of the Firestone Tire and Rubber building or the adjacent potential Period Revival residential historic district.</p> <p>The design compatibility of the new building would be in conformance with the Secretary’s Standards.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>1. Historical Resources (continued)</b>		
<p>An established pattern of tall buildings with distinctive tower elements characterizes the immediate commercial surroundings, and it is at the corner of Wilshire Boulevard and La Brea Avenue that the new building would rise to its highest point. Design elements on the project’s façade would reference the vertical decorative treatment employed on the E. Clem Wilson Building. This corner of the building also reflects bulk and massing seen on the E. Clem Wilson Building. The proposed building is several stories shorter than the tallest of the nearby historical resources, including the E. Clem Wilson Building; however, it draws upon many of the features from these historical precedents in its scale and massing.</p> <p>On the north, west, and south facades, a scale oriented to the pedestrian is achieved through a solid building mass set against the lot lines at lower levels and a broad street-level expanse of glazed storefront. At the corner of La Brea Avenue and 8<sup>th</sup> Street, a vertically oriented, curved corner element announces the retail space that runs the length of La Brea Avenue. This curved element breaks the otherwise continuous elevation of linear retail storefronts; it is both taller and more solid in its massing. The curved element at this corner is a contemporary interpretation of the Streamline Moderne canopy style featured at the Firestone Tire and Rubber retail store across 8<sup>th</sup> Street from this corner of the project site.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>1. Historical Resources (continued)</b>		
<p>On the Sycamore Avenue elevation, the scale of the existing residential pattern at street level would be replicated to complement surrounding residential historical resources. In addition, on Sycamore Avenue, a 15-foot-wide setback would allow for development of a 5,400-square-foot landscaped area along Sycamore Avenue and a 1,600-square-foot garden at the corner of Sycamore Avenue and 8<sup>th</sup> Street would provide additional transition between the height and mass of the project building and the lower-scale residential neighborhood east of the site on Sycamore Avenue.</p> <p>No indirect impacts to the nearby Miracle Mile Historic District would occur due to its distance from the project site.</p> <p>For these reasons, impacts to historical resources would be less than significant, and no mitigation measures are required.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>2. Archaeological Resources</b>		
<p>No known archaeological sites exist on or adjacent to the project site, and based on the historic uses of the project site, intact human remains are unlikely to be present beneath the site. Excavation for the foundations and subterranean parking levels associated with the proposed project would cause new subsurface disturbance on the project site. As the project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed unique archeological resources exist on this site. Based on the past uses of the site, it is unlikely that intact human remains are present beneath the site. However, unanticipated discovery of unique archeological resources or intact human remains is possible. In the event of an unexpected disturbance, significant impacts to archaeological resources and human remains could occur. However, implementation of the recommended mitigation measures would reduce potentially significant impacts to less than significant levels.</p>	<p><b>MM-CR-1:</b> If archaeological resources are uncovered on the project site during excavation, the developer must notify the Los Angeles Department of Building and Safety immediately and work must stop within a 100-foot radius until a qualified archeologist has evaluated the find. Construction activity may continue unimpeded on other portions of the project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 2103.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue.</p> <p><b>MM-CR-2:</b> If during excavation of the project site human remains are discovered, the steps described in <i>State CEQA Guidelines</i> Section 15064.5(e) shall be followed.</p> <p>(1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:</p> <p>(A) The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and</p>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>2. Archaeological Resources (continued)</b>		
	<p><b>MM-CR-2 (continued):</b></p> <p>(B) If the coroner determines the remains to be Native American:</p> <ol style="list-style-type: none"> <li>1. The coroner shall contact the Native American Heritage Commission within 24 hours.</li> <li>2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.</li> <li>3. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or</li> </ol> <p>(2) Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>2. Archaeological Resources (continued)</b>		
	<p><b>MM-CR-2 (continued):</b></p> <p>(A) The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.</p> <p>(B) The descendant identified fails to make a recommendation; or</p> <p>(C) The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>3. Paleontological Resources</b>		
<p>No unique paleontological resources or unique geologic features are known to occur on the project site; although, paleontological resources do exist throughout the City of Los Angeles. Excavation for the foundations and subterranean parking levels associated with the proposed project would cause new subsurface disturbance on the project site. As the project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed paleontological resources or unique geologic features exist in the upper levels of subsurface soil. Soils underneath the project site consist of silty clay with various amounts of silt. This soil type is not typically known to yield paleontological resources. However, unanticipated discovery of unique paleontological resources is possible. In the event of an unexpected disturbance, significant impacts to paleontological resources remains could occur. However, implementation of the recommended mitigation measure would reduce these impacts to a less than significant level.</p>	<p><b>MM-CR-3:</b> If paleontological resources are uncovered during excavation of the project site, the City of Los Angeles Department of Building and Safety must be notified immediately and work must stop within 100 feet of the find to allow a qualified paleontologist to appropriately remove the find.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>D. CULTURAL RESOURCES (continued)</b>		
<b>4. Cumulative</b>		
<p>The related projects are located far enough from the project site so as not to create any potentially significant cumulative impacts to cultural resources in the vicinity of the project site. Moreover, the only related project within the Miracle Mile Historic District (related project no. 27) was extensively studied as part of the entitlement process, and the City determined that there were no historic resources on that site.</p> <p>Furthermore, the proposed project and the related projects within the Miracle Mile CDO will be reviewed to achieve the CDO's goal of preserving architecturally significant buildings in the Miracle Mile. Implementation of the proposed project would result in less than significant impacts on cultural resources. Therefore, the contribution of the proposed project on impacts to cultural resources in the area would not be cumulatively considerable.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>E. GEOLOGY AND SOILS</b>		
<b>1. Surface Rupture and Seismic Groundshaking</b>		
<p>The proposed project is located 2.8 miles from the nearest fault (Santa Monica fault) and would comply with the California Building Code and the Los Angeles Uniform Building Code, which ensure safety in the event of an earthquake. The potential for surface rupture or seismic groundshaking is less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>
<b>2. Liquefaction and Ground Failure</b>		
<p>The project site is not located within a liquefaction zone based on the California Geologic Survey hazards maps. Also the project site is not located on a slope, and, therefore, is not at a risk for landslides. The potential for seismic-related ground failure is less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>E. GEOLOGY AND SOILS (continued)</b>		
<b>3. Sedimentation and Erosion</b>		
<p>All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70, of the Los Angeles Municipal Code, which addresses grading, excavations, and fills. Therefore, potential sedimentation and erosion impacts would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>
<b>4. Flood Zone</b>		
<p>According to the official Flood Insurance Rate Maps from the Federal Emergency Management Agency, the project site is not located within a 100-year flood zone. Given the low chance of flooding on the project site, changes in geology due to flooding is not significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>E. GEOLOGY AND SOILS (continued)</b>		
<b>5. Groundwater</b>		
<p>Groundwater beneath the project site has the potential to affect the proposed development during construction and during the life of the structure. Historical groundwater levels on the project site have been documented to be as shallow as 12 feet below the existing ground surface. Measures will be required for construction extending below the groundwater level, such as temporary dewatering or the use of drilling fluids to maintain open excavations. With adherence to one or more of these measures, geology and soil impacts associated with the proposed project during construction would be less than significant.</p> <p>Concerning project operation, measures will also be required for permanent structures extending near or below the groundwater level. Such measures should be determined by the project consultants and may include permanent dewatering, waterproofing, and designing structures to resist hydrostatic pressures (including uplift). With the selection of one or more of these measures, geology and soil impacts associated with project operation would be less than significant.</p>	<p><b>MM-GEO-1:</b> The project shall be designed and constructed in accordance with the requirements outlined in the latest edition of the California Building Code and the Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills.</p> <p><b>MM-GEO-2:</b> Prior to start of soil-disturbing activities at the site, a Notice of Intent (NOI) and SWPPP shall be prepared in accordance with, and in order to partially fulfill, the California State Water Resources Control Board Order No. 99-08-DWQ, NPDES General Permit No. CAS000002 (General Construction Permit) and Chapter 6, Article 4.4, Stormwater and Urban Runoff Pollution Control, from the Los Angeles Municipal Code. The SWPPP shall meet the applicable provisions of Sections 301 and 402 of the CWA and Chapter 6, Article 4.4, Stormwater and Urban Runoff Pollution Control, from the Los Angeles Municipal Code, by requiring controls of pollutant discharges that utilize best available technology (BAT) economically achievable and best conventional pollutant control technology (BCT) to reduce pollutants.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
E. GEOLOGY AND SOILS (continued)		
5. Groundwater (continued)		
	<p><b>MM-GEO-3:</b> The project applicant shall implement dust control measures consistent with SCAQMD Rule 403, Fugitive Dust, during the construction phases of new project development. The following actions are currently recommended to implement Rule 403 and have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the source of the dust generation:</p> <ul style="list-style-type: none"> <li>• Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days).</li> <li>• Replace ground cover in disturbed areas as quickly as possible.</li> <li>• Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content.</li> <li>• Water active grading sites at least twice daily during construction activities.</li> <li>• Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period.</li> </ul>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>E. GEOLOGY AND SOILS (continued)</b>		
<b>5. Groundwater (continued)</b>		
	<p><b>MM-GEO-3: (continued)</b></p> <ul style="list-style-type: none"> <li>• All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.</li> <li>• Sweep streets at the end of the day if visible soil material is carried over to adjacent roads.</li> <li>• Install wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.</li> <li>• Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.</li> </ul>	
<b>6. Landform Alteration</b>		
<p>The proposed project site is located on flat land in the Los Angeles area. This area is a highly urbanized area, and the project site is neither on nor near any unique or natural geologic or topographic features, such as hilltops, ridges, hill slopes, canyons, ravines, rock outcrops, water bodies, streambeds, and/or wetlands. Therefore, the project would not have a significant impact by altering landforms.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>E. GEOLOGY AND SOILS (continued)</b>		
<b>6. Landform Alteration (continued)</b>		
<b>Cumulative Impacts</b>		
<p>Potential geologic hazards associated with the proposed project are site-specific and do not represent a cumulative impact concern. Implementation of the proposed project and other projects in the Southern California region would cumulatively increase the number of structures and people exposed to geologic-and seismic-related hazards. As long as project design and construction occurs consistent with proper engineering practices and to the requirements of applicable portions of the California Building Code (CBC) and Los Angeles Uniform Building Code (LAUBC) as they apply to each component of the project, seismic and regional geologic hazards would not be considered cumulatively considerable.</p> <p>Grading of the proposed project would adhere to the City's Department of Building and Safety codes and requirements. Grading and geologic hazards and features not expected to have cumulative impacts as individual development projects would be required to comply with the requirements of the City's Department of Building and Safety thresholds. Compliance with the City's requirements would ensure that both individual and cumulative project impacts associated with the project's structure and grading would not exceed the identified thresholds of significance. Therefore, impacts would not be cumulatively considerable, so are considered to be less than significant.</p>	None required or recommended.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>F. HAZARDS AND HAZARDOUS MATERIALS</b>		
<b>1. Construction Impacts</b>		
<i>Soil and Groundwater Contamination</i>		
<p>Reported laboratory analytical results for selected soil and/or groundwater samples collected from the project site indicated the following constituents at concentrations greater than the laboratory method detection limit (MDL): Total petroleum hydrocarbons (TPH), such as diesel (TPHd) and oil (TPHo), volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and select California Administrative Manual (CAM) 17 Metals. As a result, the consequences to people from exposure to some or all of these constituents during either construction or operation of the proposed project are potentially significant.</p> <p>The identified impacts to soil and/or groundwater beneath the project site would be addressed under a site-specific independent removal action. An assessment of the potential risk to human health and the environment resulting from the identified impacts to soil and groundwater at the project site and the proposed removal action would be presented within a Draft RAW. The Draft RAW would provide proposed remediation goals for each constituent of potential concern and would be submitted to the LARWQCB for review and comment prior to implementation.</p>	<p><b>MM-HAZ-1:</b> Prior to the demolition/grading activities, contractors shall be required to have a construction worker safety plan that complies with the Occupational Safety and Health Administration (OSHA) Safety and Health Standards and shall address, as appropriate, air monitoring for sub-surface work activities, personnel protective and safety equipment, and worker training.</p> <p><b>MM-HAZ -2:</b> Identified impacts to soil and/or groundwater beneath the project site shall be addressed under a site-specific independent removal action. An assessment of the potential risk to human health and the environment resulting from the identified impacts to soil and groundwater at the project site and the proposed removal action shall be presented within a Draft Removal Action Workplan (RAW). The Draft RAW shall provide proposed remediation goals for each constituent of potential concern and shall be submitted to the LARWQCB for review and comment prior to implementation.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>F. HAZARDS AND HAZARDOUS MATERIALS (continued)</b>		
<b>1. Construction Impacts (continued)</b>		
<i>Soil and Groundwater Contamination (continued)</i>		
<p>Residual soil and groundwater, which may require special handling and were not addressed during the proposed independent removal action, would be addressed under an RMP. The RMP will be implemented during construction and would present site-specific health and safety protocols and soil/groundwater handling procedures.</p> <p>Mitigation measures, which require the implementation of a RAW and RMP, would reduce the risk of exposure to people during either construction or operation of the proposed project to a less than significant level.</p>	<p><b>MM-HAZ -3:</b> Prior to excavation and/or grading the applicant shall prepare and provide to contractors a Risk Management Plan (RMP) that describes the type of contaminants and subsurface features that may be encountered at the project site and procedures for evaluating and managing such materials.</p> <p><b>MM-HAZ -4:</b> Grading and demolition contractors shall be required by construction specifications to secure approval of haul routes to export or otherwise transport off-site excavated materials prior to commencement of such activity.</p> <p><b>MM- HAZ -5:</b> Residual soil and groundwater, which may require special handling and was not addressed during the proposed independent removal action, shall be addressed under a Risk Management Plan (RMP). The RMP shall be implemented during construction and shall present site-specific health and safety protocols and soil/groundwater handling procedures.</p>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>F. HAZARDS AND HAZARDOUS MATERIALS (continued)</b>		
<b>1. Construction Impacts (continued)</b>		
<i>Asbestos – Lead Paint</i>		
<p>Structures constructed or remodeled between 1930 and 1981, such as the existing church and commercial strip center, have the potential to contain asbestos-containing building materials (ACBM). In addition, the two structures were constructed prior to the ban on lead-containing paints in 1979. Construction activities, especially demolition of existing structures on the project site, could result in the release of the asbestos-containing materials (ACM), fibers, and lead-based paint dust. The presence of these materials represents a potentially significant health hazard. Recommended mitigation measures to remove and properly dispose of ACMs and lead-based paint (LBP) would reduce this impact to less than significant.</p>	<p><b>MM-HAZ -6:</b> Prior to demolition, the project applicant shall comply with applicable legal requirements related to asbestos removal and demolition activities involving ACBM, including the requirements of the SCAQMD Rule 1403 for ACBMs.</p> <p><b>MM-HAZ -7:</b> The project applicant shall comply with the requirements outlined by the California Occupational Safety and Health Administration (Cal/OSHA) Lead in Construction Standard, Title 8, California Code of Regulations (CCR) 1532.1 during demolition activities. Lead-contaminated debris shall be managed and disposed of in accordance with the applicable provisions of the California Health and Safety Code.</p>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>F. HAZARDS AND HAZARDOUS MATERIALS (continued)</b>		
<b>1. Construction Impacts (continued)</b>		
<i>Roadway Hazard</i>		
<p>Construction of the project may result in temporary partial obstruction to adjacent roadways. The project would be required to comply with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments, as well as fire protection and security. The project applicant would comply with applicable fire department, police department, DPW, and Department of Building and Safety regulations relating to access. As a result, impacts with regard to emergency access would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>F. HAZARDS AND HAZARDOUS MATERIALS (continued)</b>		
<b>2. Operational Impacts</b>		
<i>Handling, Storage, Transport and Disposal of Hazardous Materials</i>		
<p>Implementation of the proposed project would not involve the use of hazardous substances with the potential for accidental release or explosion. The only known hazardous substances associated with project operations would be chemical cleaners, landscaping-related chemicals, and other common household hazardous substances. The quantities of these materials would be limited to those typically utilized in households and retail settings. The potential for accidental release and/or explosion of these substances is low, and no aspects of the project design could result in the accidental release or explosion of a hazardous substance; therefore, no potentially significant hazardous substance impacts related to the project design would occur.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>F. HAZARDS AND HAZARDOUS MATERIALS (continued)</b>		
<b>2. Operational Impacts (continued)</b>		
<i>Listed Hazardous Materials Sites</i>		
<p>All surrounding sites listed on the federal and state environmental databases have been analyzed in the Phase 1 Environmental Site Assessment (ESA) relative to the proposed project and the Phase I ESA determined that the sites do not represent a recognized environmental condition to the project site due to the lack of reported violations, the remediation status, and hydraulic location of the sites. Therefore, though some sites in the vicinity of the project are listed as hazardous sites, the probable frequency and severity of consequences to the proposed project site from these sites is less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>
<i>Interference with an Emergency Response And Evacuation Plans</i>		
<p>Development of the proposed project would be required to comply with all applicable community and City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire department. The project would redevelop a site that is currently developed with urban uses. As such, emergency and evacuation plans would remain similar to the current existing plans. The impact of the proposed project on emergency response and evacuation plans would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<p><b>F. HAZARDS AND HAZARDOUS MATERIALS (continued)</b></p>		
<p><b>2. Operational Impacts (continued)</b></p>		
<p><i>Methane Gas</i></p>		
<p>The project site is within a City Methane Zone associated with the Downtown Los Angeles oil field. Since the project site is located within a City-defined Methane Zone, the impact of methane to the project site during construction and operation is considered potentially significant, and mitigation measures are required, according to Section 91.7104.2 of the Municipal Code. Adherence to methane mitigation system requirements and mitigation measures would decrease these impacts to less than significant levels.</p>	<p><b>MM-HAZ-8:</b> Prior to issuance of a building permit, applicant shall comply with the City Methane Seepage Regulations, Section 91.7100 et seq. of Los Angeles Municipal Code.</p> <p><b>MM-HAZ-9:</b> Should any unrecorded oil well be found during excavation and grading, it shall be abandoned in accordance with Division of Oil, Gas, and Geothermal Resources (DOGGR) Regulations. Prior to issuance of any building permit within a lot affected by discovery of an unrecorded oil well, the applicant shall submit a final clearance letter issued by DOGGR regarding the proper abandonment of the well(s).</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>F. HAZARDS AND HAZARDOUS MATERIALS (continued)</b>		
<b>3. Cumulative Impacts</b>		
<p>The hazardous impacts associated with a proposed project usually occur on a project-by-project basis, rather than in a cumulative nature. Because project implementation would comply with regulatory controls to abate the site-specific hazards, any potential cumulative impacts associated with the project would be decreased as the harmful substances and subsequent exposure to a health hazard would be removed from the project site. Therefore, cumulative impacts associated with the proposed project are considered to be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY</b>		
<b>1. Construction and Operational Impacts</b>		
<i>Surface Water Quality</i>		
<p>During project construction, grading activities associated with construction could potentially result in a temporary increase in the amount of suspended solids running off the site. In the event of rainfall, construction site runoff originating from the project site could result in sheet erosion of exposed soil. Erosion of exposed soil caused by runoff could affect surface water quality in the vicinity of the project site, as well as downstream from the project site as water flows through Ballona Creek and into the Pacific Ocean. Therefore, construction-related erosion could result in a potentially significant impact to surface water quality; however, through the incorporation of recommended mitigation measures, this impact can be reduced to a less than significant level. Mitigation measures include satisfying the requirements of the NPDES and the Stormwater and Urban Runoff Pollution Control from the Los Angeles Municipal Code, which includes the preparation of a Standard Urban Stormwater Mitigation Plan (SUSMP). The SUSMP would incorporate best management practices (BMPs) by requiring controls of pollutant discharges that utilize BAT and BCT to reduce pollutants.</p>	<p><b>MM-HYD-1:</b> Prior to start of soil-disturbing activities at the site, a NOI and SWPPP shall be prepared in accordance with, and in order to partially fulfill, the California SWRCB Order No. 99-08-DWQ, NPDES General Permit No. CAS000002 (General Construction Permit). The SWPPP shall meet the applicable provisions of Sections 301 and 402 of the Clean Water Act and Chapter 6 Article 4.4, Storm Water and Urban Runoff Pollution Control, from the Los Angeles Municipal Code by requiring controls of pollutant discharges that utilize BAT and BCT to reduce pollutants. Examples of BAT/BCT that may be implemented during site grading and construction could include straw hay bales, straw bale inlet filters, filter barriers, and silt fences.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>1. Construction and Operational Impacts (continued)</b>		
<i>Surface Water Quality (continued)</i>		
<p>Concerning operation, the existing site is occupied by uses that could potentially contribute to decreased surface water quality (i.e., buildings containing lead-based paint and asbestos-containing material, and a surface parking lot potentially containing surface oil products). While the proposed project would increase the intensity of land uses on the project site, the amount of developed area on each site would remain similar to existing conditions. Thus, it is unlikely that the proposed project would result in an increase in site runoff.</p> <p>Storm water quality is generally affected by the length of time since the last rainfall, rainfall intensity, urban uses of the area and quantity of transported sediment. Typical urban water quality pollutants usually result from motor vehicle operations, oil/grease residues, fertilizer/pesticide uses, human/animal littering, careless material storage/handling, and poor property management. The majority of pollutant loads are usually washed away during the first flush of the storm occurring after the dry-season period.</p>	<p><b>MM-HYD-2:</b> The project applicant shall prepare and implement an SUSMP in accordance with the requirements of Chapter 6, Article 4.4, Storm Water and Urban Runoff Pollution Control, from the Los Angeles Municipal Code, to ensure that stormwater runoff is managed for water quality concerns through implementation of appropriate and applicable BMPs. Prior to issuance of any grading or building permits, the County and/or Stormwater Division of Bureau of Sanitation must approve the SUSMP.</p> <p>The following is a listing of applicable BMPs that may be implemented as part of the project through the preparation of the SUSMP:</p> <ul style="list-style-type: none"> <li>• Provide reduced-width sidewalks and incorporate landscaped buffer areas between sidewalks and streets.</li> <li>• Use permeable materials for private sidewalks, driveways, parking lots, or interior roadway surfaces (e.g., hybrid lots, parking groves, permeable overflow parking, etc.).</li> </ul>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>1. Construction and Operational Impacts (continued)</b>		
<i>Surface Water Quality (continued)</i>		
<p>Street and parking lot-/garage-generated pollutants typically contain atmospheric pollution, tire-wear residues, petroleum products, oil and grease, fertilizer and pesticide wash-offs, and industrial chemical spills, as well as animal droppings and litter types of wastes. The pollutants are washed from street surfaces by a rainfall adequate to produce sufficient runoff. The amount of pollutants washed off the street surface is a function of the amount of pollutants on street surfaces and amount of surface water flow by storm and non-storm events such as hosing down of walkways and parking garage surfaces. These pollutants have the potential to degrade water quality and may result in significant impacts. Operation of the proposed project would result in an increase in land use intensity and, thus, potentially an increase in the presence of site contaminants. All parking and building maintenance areas would be located in the subterranean parking structure.</p>	<ul style="list-style-type: none"> <li>• Where feasible, direct rooftop runoff to pervious areas such as yards, open channels, or vegetated areas, and avoid routing rooftop runoff to the roadway or the storm water conveyance system.</li> <li>• Infiltration trenches</li> <li>• Oil/water separators</li> <li>• Catch basin inserts</li> <li>• Continuous flow deflection/separation systems</li> <li>• Storm drains inserts</li> <li>• Media filtration</li> <li>• Bioretention facility</li> <li>• Dry wells</li> <li>• Cisterns</li> <li>• Foundation planting</li> <li>• Catch basin screens</li> <li>• Normal flow storage/separation systems</li> <li>• Clarifiers</li> <li>• Filtration systems</li> <li>• Primary wastewater treatment systems</li> </ul>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>1. Construction and Operational Impacts (continued)</b>		
<i>Surface Water Quality (continued)</i>		
<p>Therefore, the quantity of land devoted to uses that could result in the transport of on-site contaminants through site runoff is minimal and comparable to existing conditions. The increase in land use intensity relative to the current land uses could result in a potentially significant impact to surface water quality; however, through the incorporation of a recommended mitigation measure, this impact could be reduced to a less than significant level.</p>	<p><b>MM-HYD-3:</b> The project contractor, during construction, and the project owner, during operation, shall properly store hazardous materials to prevent contact with precipitation or runoff.</p> <p><b>MM-HYD-4:</b> The project contractor, during construction, and the project owner, during operation, shall develop and maintain effective monitoring and a cleanup program for spills and leaks of hazardous materials.</p> <p><b>MM-HYD-5:</b> The project contractor, during construction, and the project owner, during operation, shall place equipment to be repaired or maintained in covered areas on a pad of absorbent material to contain leaks, spills, or small discharge.</p> <p><b>MM-HYD-6:</b> The project contractor, during construction, and the project owner, during operation, shall provide periodic and consistent removal of landscape and construction debris.</p>	

Project Impacts	Mitigation Measures	Significance After Mitigation
G. HYDROLOGY AND WATER QUALITY (continued)		
1. Construction and Operational Impacts (continued)		
<i>Surface Water Quality (continued)</i>		
	<p><b>MM-HYD-7:</b> The project contractor, during construction, and the project owner, during operation, shall sweep parking lots at regular, frequent intervals to remove debris. The project contractor, during construction, and the project owner, during operation, shall also remove any significant chemical residue on the project site through appropriate methods.</p> <p><b>MM-HYD-8:</b> The project owner, landscapers, and maintenance team, during project operation, landscaping, and maintenance activities, shall use non-toxic alternatives for such applications as insecticides, herbicides, rodenticides, and fertilizers. Furthermore, chemical controls shall only be applied outdoors when precipitation is not forecast for the project area.</p>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>1. Construction and Operational Impacts (continued)</b>		
<i>Groundwater Quality</i>		
<p>The construction of foundations for medium-rise buildings and subterranean parking structures could have the potential to interfere with groundwater by intercepting the aquifer during excavation. The proposed project involves the construction of a high-rise building and a subterranean parking structure. The geotechnical investigation conducted for the proposed project determined that the depth of groundwater on the site is between 16 to 21 feet below the ground surface. The subterranean parking structure would be approximately 36 feet below ground surface. Therefore, excavation for the proposed project would exceed a depth of 16 to 21 feet below ground surface, and thus would encounter groundwater during project construction. Therefore, project construction could result in a significant impact to groundwater or groundwater quality.</p> <p>During construction, dewatering may be required and could be achieved with temporary dewatering wells, storage tanks, and filters. Treated water would then be disposed of into the City storm drain system. Dewatering activities would require an NPDES Permit for Groundwater Discharge from the LARWQCB. This permit would ensure that water discharged into the City’s storm drain system would meet all NPDES requirements for suspended solids, organic material, and other water quality parameters thereby reducing water quality impacts associated with this activity would be reduced to a less than significant level.</p>	<p>See mitigation measures <b>MM-HYD-1</b> and <b>MM-HYD-8</b>.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>1. Construction and Operational Impacts (continued)</b>		
<i>Groundwater Quality (continued)</i>		
<p>The groundwater beneath the project area is currently contaminated, and given the existing groundwater level, project construction activities could affect groundwater. Treated water would then be disposed of into the City storm drain system. Disposal of treated groundwater would require an NPDES Permit for Groundwater Discharge from the LARWQCB, which would ensure that water discharged into the City's storm drain system, would meet all NPDES requirements for suspended solids, organic material, and other water quality parameters. Therefore, water quality impacts associated with this activity would be reduced to a less than significant level.</p> <p>Concerning operation, the existing project site consists largely of impervious surfaces. Upon implementation of the proposed project, conditions at the project site would be comparable to existing conditions, as the site would continue to be developed predominantly with impervious surfaces. Therefore, the project site does not currently allow for direct percolation within the Central Los Angeles Basin. As such, implementation of the proposed project is not expected to contribute to or result in groundwater contamination in the project vicinity, and thus there is no potential for significant impacts to groundwater resources.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>1. Construction and Operational Impacts (continued)</b>		
<i>Groundwater Quality (continued)</i>		
<p>Since the project site is currently and would remain, predominantly covered by impervious surfaces, the project site would not contribute to groundwater recharge. Therefore, the project would not affect groundwater quality of existing wells. No potential for significant groundwater quality impacts would result from project implementation.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>2. Cumulative Impacts</b>		
<i>Surface Water Impacts</i>		
<p>Development of the proposed project in combination with the list of related projects could result in the violation of water quality and/or waste discharge requirements during construction and operation. However, the project and each of the related projects would be required to prepare an SWPPP for construction activities. In addition, the operation of all the related projects are required, by Chapter 13.29, Storm Water and Urban Runoff Pollution Prevention Control and SUSMP of the Los Angeles Municipal Code, to submit and implement an SUSMP containing design features and BMPs appropriate and applicable to the project to reduce post-construction pollutants in stormwater discharges. Potential water quality impacts of the Citywide related projects in combination with the proposed project would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>2. Cumulative Impacts</b>		
<i>Surface Water Impacts (continued)</i>		
<p>The Santa Monica Bay Watershed Management Area (WMA), within the limits of the City of Los Angeles, is composed mainly of urban uses, with remaining open spaces being devoted to uses not likely to be developed. As a result, most of the drainage system in the watershed consists of engineered storm channels and, therefore, is expected to experience little change. Additionally, as extensive development is not expected in the remaining open spaces, it is unlikely that there would be substantial alteration of drainage systems and watercourses in those areas. Because the proposed project, as well as the related projects, would be constructed on already urban-developed sites, the amount of runoff would not substantially increase, and therefore, substantial increases in erosion, siltation, flooding, and exceedance of the stormwater drainage system are not expected. Cumulatively, the project does not have the potential for significant impacts related to runoff and stormwater drainage.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>2. Cumulative Impacts (continued)</b>		
<i>Surface Water Impacts (continued)</i>		
<p>Existing stormwater facilities are adequate to accommodate existing and anticipated flows. The proposed project, as well as the related projects identified in Section III, General Description of Environmental Setting, of the Draft EIR, would be located in the urbanized environment of Los Angeles. While cumulative future development may require that there be some localized modifications or additions to the existing stormwater drainage system, it is expected that these modifications or additions would not be extensive, as stormwater drainage systems already exist in the primarily impervious and urbanized area of Downtown Los Angeles. Consequently, there is no potential for significant cumulative impacts from implementation of the proposed project in combination with the identified related projects.</p> <p>The proposed project is not anticipated to result in a cumulatively considerable contribution to the degradation of surface water quality in Los Angeles or the greater Los Angeles Basin.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>2. Cumulative Impacts (continued)</b>		
<i>Groundwater Quality</i>		
<p>Implementation of Citywide projects would result in additional development that could indirectly require an increased use of groundwater through the provision of potable water provided by Los Angeles Department of Water and Power (LADWP). However, the provision of water, including the increased use of groundwater supplies, as a result of the cumulative development of the proposed projects and identified related projects is within the established demand projections of the LADWP (refer to Section IV.L.1, Water, of the Draft EIR for supplementary analysis of water supplies). Groundwater to be consumed by cumulative development would be consumed according to current plans and projections by the LADWP and would not, therefore, be substantially depleted as a result of the implementation of cumulative development.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>G. HYDROLOGY AND WATER QUALITY (continued)</b>		
<b>2. Cumulative Impacts (continued)</b>		
<i>Groundwater Quality (continued)</i>		
<p>Recharge in the Los Angeles Coastal Plain consists of percolation, precipitation, and return water from irrigation. Individual basins within the Los Angeles Coastal Plan may also be replenished by the following: surface water spreading of local runoff, imported water and reclaimed water, injection of imported water (for protection against saline intrusion), and subsurface inflow from other basins. Neither the proposed projects nor any of the identified related projects would be developed within a recharge area, and, as such, cumulative impacts to groundwater recharge would be less than significant.</p> <p>Development of the proposed project and the related projects are not expected to substantially degrade groundwater quality or have any significant cumulative effects.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING</b>		
<b>1. Operational Impacts</b>		
<p>The project site is currently occupied by a church, a commercial strip center, and paved parking areas. The paved parking areas are utilized by both the church and commercial strip center patrons. The project site is situated among retail-commercial, office, residential, and parking uses. Since the project site is an existing urban space and the proposed project would include a mixture of residential and commercial uses, the project would fit well with surrounding land uses. The proposed project would not add a new land use to the area as the project would provide a mixture of land uses, and thus, would not result in secondary impacts to surrounding uses or divide the community. Therefore, the project would complement surrounding land uses and would not divide or disrupt the existing neighborhood. Finally, there is no potential for significant secondary impacts to surrounding land uses because the project involves a mix of land uses, including residential and retail-commercial, similar to surrounding land uses. Therefore, no potential for significant land use impacts associated with disrupting or affecting the surrounding community would occur.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING (continued)</b>		
<b>1. Operational Impacts (continued)</b>		
<p>The proposed project would be consistent with the general plan framework’s land use objectives for the Regional Center designation. The project would integrate housing with commercial uses and amenities, thereby ensuring complementary and supportive uses within the Regional Center. The density of the proposed structure has a floor area ratio (FAR) of 3.4:1. It is thereby within the recommended FAR for regional centers. Generally, regional centers will range from FAR 1.5:1 to 6:1 and are characterized by 6- to 20-story (or higher) buildings as determined in the community plan. The project’s FAR would be within the range of the typical FAR for regional centers and the height of the proposed project, 7 stories, is within the range of heights typical for regional centers of 6 to 20 or more stories. In addition, land uses that are encouraged by the general plan framework on regional center properties include mixed-use projects such as the Wilshire and La Brea Project. Consequently, the project is consistent with the general plan framework policies related to the Regional Center and no significant impacts would result.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING (continued)</b>		
<b>1. Operational Impacts (continued)</b>		
<p>The proposed project is consistent with the goals and policies listed in the Wilshire Community Plan. However, implementation of the proposed project would require a general plan amendment to change the designation for the southernmost portion of the project site along La Brea Avenue from General Commercial to Regional Center Commercial. The amendment is required because the residential portion of the project requires a minimum residential density of 200 square feet per unit. The current R4 zone permitted by the existing C4 zone designation over the entire site (after zone change) only allows a minimum residential density of 400 square feet per unit. However, mixed-use developments located on properties designated as Regional Center Commercial, as in the case of the proposed project, can utilize R5 development standards, which require only 200 square feet of minimum lot area for each unit. The City Planning Department prefers as a general policy that general plan designations remain consistent over an entire project site, whenever possible. Therefore, in order to take advantage of the residential density allowed under the R5 zone and to achieve a consistent designation across the entire site, the southernmost portion of the project site along La Brea Avenue will be re-designated with the Regional Center Commercial land use designation. With this amendment, conflicts between general plan land use designations and zoning requirements would not occur on the site and project implementation would not result in significant impacts.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING (continued)</b>		
<b>1. Operational Impacts (continued)</b>		
<p>The City of Los Angeles Zoning Code is a tool to implement the general plan and provides regulations to preserve public peace, health, and safety. The zoning code designates the project site as [Q] C4-2-CDO along Wilshire Boulevard, C2-1 along La Brea Avenue, and [Q] C2-1 along Sycamore Avenue, all of which permit commercial and residential uses within this zone. Uses proposed for the Wilshire and La Brea Project, including residential, commercial and parking uses, are allowed within these zones.</p> <p>Height District 1 associated with the C2-1 zone along La Brea Avenue and the [Q] C2-1 along Sycamore allow a maximum FAR of 1.5:1 while Height District 2 associated with the C4-2-CDO along Wilshire Boulevard allows a maximum FAR of 6:1. As portions of the project exceed the FAR permitted under Height District 1, implementation of the project will require that the entire site be rezoned as [T][Q]C4-2.</p> <p>Other approvals necessary to comply with the Los Angeles Municipal Code (LAMC) include a Vesting Tentative Tract Map, including the vacation of an alley, a Zoning Administrator Adjustment for 0-foot yards adjacent to an alley to allow buildings to encroach on the alley prior to recordation of the final map and vacation of the alley, a building line removal along Wilshire Boulevard, site plan review, and a master conditional use permit for alcoholic beverages.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING (continued)</b>		
<b>1. Operational Impacts (continued)</b>		
<p>Development of the project would help implement the goals and design principals contained in the Miracle Mile Community Design Overlay District (CDO). The retail and restaurant components of the project will provide entrances at the street level. In addition, the project will provide landscaping along Sycamore Avenue and planters along Wilshire Boulevard, La Brea Avenue, and 8<sup>th</sup> Street. Consequently, the project would be consistent with the goal to encourage development that adds to a pedestrian-friendly environment.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING (continued)</b>		
<b>1. Operational Impacts (continued)</b>		
<p>The CDO's design guidelines and standards also identify five design principals. Concerning the principal of consistency, while modern in its forms and materials, the building is referential to its context, which features well-known Art Deco buildings, including the Wilson Tower (Samsung) located to the north of the project site across Wilshire Boulevard. The accent tower at the corner of Wilshire Boulevard and La Brea Avenue would be up to 130 feet above grade and lower than the height of the Wilson building, which is approximately 196 feet. However, this corner of the building reflects the bulk and massing seen on the E. Clem Wilson Building. While the proposed building is several stories shorter than the tallest of the nearby historical resources, including the E. Clem Wilson Building, it draws upon many of the features from this historical precedent in its scale and massing. The curved element at the corner of Wilshire Boulevard and 8<sup>th</sup> Street is a contemporary interpretation of the Streamline Moderne canopy style featured at the Firestone Tire and Rubber retail store across 8<sup>th</sup> Street from this corner of the project site.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING (continued)</b>		
<b>1. Operational Impacts (continued)</b>		
<p>Concerning the principal of activity, in an effort to promote pedestrian activity, entrances to the proposed structure would be oriented towards Wilshire Boulevard and set back from the street. In addition, the sidewalks fronting the building would be textured, thus further identifying the pedestrian zone. Similarly, in order to adhere to the principal of pedestrian orientation, articulation along the lower level of the proposed structure would avoid blank surfaces and street trees along the sidewalk would provide shade.</p> <p>Concerning the principal of safety, loading, and parking would be located inside the building, and both of the driveways would enter and exit along less traveled streets. For example, one residential and retail entrance would be located along 8<sup>th</sup> Street while the other residential and retail entrance would be located along Sycamore Avenue. Locating the loading and parking areas and the driveways in this manner would minimize potential conflicts between pedestrians and other automobiles. As for the principal of simplicity, signage will be incorporated into the proposed building and would complement the façade. Signs directing vehicular and pedestrian traffic would also be included. The project is, therefore, consistent with the CDO's guidelines and would not result in any significant impacts in regards to consistency with the guidelines.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING (continued)</b>		
<b>1. Operational Impacts (continued)</b>		
<p>Finally, several regional plans are applicable to the proposed project. As the project site is located within the jurisdiction of SCAG, which includes Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial counties, land uses proposed by the project are governed by goals, objectives, and polices contained in the Regional Comprehensive Plan and Guide (RCPG), the 2004 Regional Transportation Plan (RTP), and the 2004 Growth Vision Report. The proposed project is consistent with all the goals, policies, and principals listed in these plans.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>H. LAND USE AND PLANNING (continued)</b>		
<b>2. Cumulative Impacts</b>		
<p>Implementation of the proposed Wilshire and La Brea Project, on its own, would not result in land use incompatibilities or plan inconsistencies; thus, no significant land use impacts would occur. In considering the proposed project's cumulative contribution, with those from the list of related projects identified in Section III, General Description of Environmental Setting, of the Draft EIR, upon City approval of the requested entitlements the proposed project, as well as the related projects, would be consistent with the City's general plan and the City's zoning code. Implementation of the proposed project and the related projects would further the goals and objectives of these plans, ultimately contributing to a revitalized, renewed, and economically and culturally diverse Wilshire Community Plan Area. Therefore, the proposed project would neither on its own, nor as a cumulative contribution to development in the greater Wilshire Community Plan Area, result in a significant cumulative impact.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>I. NOISE</b>		
<b>1. Construction-Related Impacts</b>		
<p>Construction of the proposed project would result in temporary but significant and unavoidable impacts related to noise levels. Construction activities are not permitted between 9:00 PM and 7:00 AM on weekdays, 6:00 PM to 8:00 AM on Saturdays, or at any point on Sundays; as such, project construction would not exceed the ambient noise level by the threshold of 5 decibels measured on an A-weighted scale (dB(A)) or more during normal sleep hours. The closest sensitive receptors in the vicinity of the project site include multi-family residences located approximately 60 feet to the south across 8<sup>th</sup> Street and 75 feet to the east across Sycamore Avenue. If construction equipment were operating at the property line, it is possible that temporary and periodic exterior noise levels of up to 91.5 dB(A) would occur at sensitive receptor locations in the vicinity of the project site. As a result, construction activities on the project site would exceed existing ambient exterior noise levels by 5 dB(A) or more at a noise-sensitive use. Therefore, construction noise associated with the project site has the potential to result in significant impacts, and while noise from construction equipment would be minimized with the implementation of mitigation measures, noise impacts would still remain significant and unavoidable.</p>	<p><b>MM-N-1:</b> Provide notification to the residential land uses on Sycamore Avenue and 8th Street across from the project site at least 10 days in advance of construction activities that are anticipated to result in high vibration levels, such as large bulldozers, caisson drills, and jackhammers, within 60 feet of these uses.</p> <p><b>MM-N-2:</b> Demolition, earthmoving, and other construction activities that are anticipated to result in high vibration levels, such as operation of large bulldozers, caisson drills, and jackhammers, shall, when feasible, be conducted so as not to occur concurrently.</p> <p><b>MM-N-3:</b> Select demolition methods to minimize vibration, where feasible.</p> <p><b>MM-N-4:</b> Operate earthmoving equipment on the construction sites as far away from surrounding residential uses as is feasible .</p> <p><b>MM-N-5:</b> All construction equipment shall be equipped with appropriate mufflers and be in good working condition.</p>	<p>Significant And Unavoidable</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>I. NOISE (continued)</b>		
<b>1. Construction-Related Impacts (continued)</b>		
	<p><b>MM-N-6:</b> Construction noise reduction methods, such as shutting off idling equipment and maximizing the distance between construction equipment staging areas and occupied residential areas, shall be used, where feasible.</p> <p><b>MM-N-7:</b> Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party.</p>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>I. NOISE (continued)</b>		
<b>2. Operational Impacts</b>		
<p>The proposed project would result in permanent ambient noise level increases ranging from 0.0 to 1.2 dB(A) on surrounding roadways during the weekday. The largest project related increase of 1.2 dB(A) would occur on Sycamore between Wilshire and 8<sup>th</sup>. The following road segments would have a community noise equivalent level (CNEL) that falls under the “normally unacceptable” and “clearly unacceptable” categories: 3<sup>rd</sup> Street between La Brea and Highland, Olympic between Hauser and La Brea, Olympic between La Brea and Highland, and Highland between 3<sup>rd</sup> and Wilshire. The road segment of Highland between Wilshire and 8<sup>th</sup> would have a CNEL of 70.0 dB(A) and would fall under the “normally unacceptable” category. None of the roadway segments would result in an increase in CNEL of 3 dB(A) to or within the “normally unacceptable” or “clearly unacceptable” category, or by 5 dB(A) within “normally acceptable” or “conditionally acceptable” category. Therefore, the increase in exterior noise levels due to project-related traffic would not have the potential to result in significant impacts on uses adjacent to the roadways.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>I. NOISE (continued)</b>		
<b>2. Operational Impacts (continued)</b>		
<p>Concerning interior noise levels, with windows closed, outside to inside attenuation for buildings within California typically range from 25 to 30 dB(A). Interior noise levels within residential uses on the project site would be approximately 29.5 dB(A) to 41.3 dB(A) and, therefore, would be below the established interior noise standard of 45 dB(A). The construction standards recommended in the mitigation measures found below would ensure that on-site interior noise levels are kept below the established interior noise standard. Therefore, impacts to interior living areas on site would be less than significant.</p> <p>Section IV.H, Noise, of the Draft EIR also considered parking structure noise, loading dock noise, and noise from rooftop mounted equipment during the operation of the proposed project, and found these sources of noise would not cause noise levels at off-site sensitive receptors to exceed the 5 dB(A) significance threshold.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>I NOISE (continued)</b>		
<b>3. Cumulative Impacts</b>		
<i>Construction-Related Impacts</i>		
<p>There are 37 related projects located within the vicinity of the project site, all of which have the potential to produce construction noise impacts. Given that timing of construction activities for the related projects cannot be fully defined, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. In addition, each of the related projects would have to comply with the local noise ordinance, as well as any mitigation measures that may be incorporated pursuant to CEQA-required environmental review that would reduce construction noise for each project to the extent feasible. As such, individual construction noise impacts would only contribute to cumulative impacts when projects are in proximity to each other. The closest related project to the project site is a residential project proposed at 5500 Wilshire Boulevard, approximately 0.20 mile to the west of the proposed project. Construction of the proposed project and the proposed related residential project represents the worst-case scenario under cumulative construction impacts. The closest sensitive receptors to both projects are multi-family residences are located 75 feet to the east of the proposed project and 75 feet southeast of the proposed related residential project. Given the proposed related residential project's distance from the project site, intervening commercial structures along</p>	<p>See mitigation measures <b>MM-N-1</b> through <b>MM-N-7</b>.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>I NOISE (continued)</b>		
<b>3. Cumulative Impacts (continued)</b>		
<i>Construction-Related Impacts (continued)</i>		
<p>Wilshire Boulevard between the project site and the proposed related residential project site and incorporation of standard construction mitigation measures, the construction of the proposed project would not contribute to cumulative noise levels in combination with the related residential project. Therefore, the proposed project's construction noise impacts would not be cumulatively considerable and would not have the potential to result in significant cumulative impacts.</p>		

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>I NOISE (continued)</b>		
<b>3. Cumulative Impacts (continued)</b>		
<i>Roadway Noise</i>		
<p>Cumulative noise impacts would primarily occur as a result of increased traffic on local roadways due to ambient growth and other developments in the vicinity of the project site. The traffic study conducted for the proposed project in May 2007 projected future traffic volumes based on year 2010 weekday conditions. The predicted 2010 ambient noise levels presented in the analysis with and without the proposed project are based on cumulative traffic conditions, which already take into account expected development of related projects identified in the surrounding area. Noise levels along studied roadway segments are predicted to range from 58.3 to 71.9 dB(A) as a result of cumulative traffic volumes without the proposed project. Project-related noise would result in a 1.2 dB(A) increase or less (as compared to cumulative conditions without the proposed project), which is not audible to the human ear and would not represent a cumulatively considerable increase. As a result, the project's contribution would not cause the ambient noise level measured at the property line of adjacent uses to increase by 3 dB(A) in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or by 5 dB(A) within the "normally acceptable" or "conditionally acceptable" category. Therefore, the project would not have a considerable contribution to a significant cumulative roadway noise level impact.</p>	None required or recommended.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>J. POPULATION AND HOUSING</b>		
<p>Implementation of the proposed project would add 1,220 residents and 562 new residential units, which is accounted for in growth projections for the City of Los Angeles and the Wilshire Community Plan Area. The project site is already developed and served by transportation, public services, and public utilities as detailed in the Draft EIR in Section IV.K, Transportation, Section IV.J, Public Services, and Section IV.L, Public Utilities, and would not require construction or expansion of infrastructure to meet the needs of additional residential population. Impacts would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>
<b>Cumulative Impacts</b>		
<p>The housing and population growth generated by the proposed project in conjunction with Citywide related projects would not exceed SCAG projections or projections for the Wilshire and La Brea Community Plan. Therefore cumulative impacts associated with growth would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K. PUBLIC SERVICES</b>		
<b>1. Police Protection</b>		
<i>Construction Impacts</i>		
<p>During construction of the proposed project, a potential increase in the frequency of calls for equipment theft, trespassing, vandalism, and traffic congestion could result in an increased demand on police services. In addition, temporary lane closures on streets adjacent to the project site could also temporarily disrupt police services.</p> <p>Parking facilities in the vicinity of the project site are very limited. However, construction workers will be provided with an off-street secured parking area.</p> <p>With implementation of the recommended mitigation measures, impacts to police services during construction would be reduced to a less than significant level.</p>	<p><b>MM-PP-1:</b> The project applicant shall incorporate security features on the construction site, such as fencing and locked entrances; and construction equipment, tools, and materials shall be secured by locking or placing them within sheds and/or other inaccessible areas while not in use.</p> <p><b>MM- PP-2:</b> A Construction Traffic Control Plan/ Management Plan shall be prepared per LADOT requirements to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the vicinity of the project. In addition, access on to the project site shall remain clear and unobstructed and proposed roadway modifications shall assure adequate access to the proposed project site and adjacent areas.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K. PUBLIC SERVICES (continued)</b>		
<b>1. Police Protection (continued)</b>		
<i>Operational Impacts</i>		
<p>During project operation there would be 1,220 new residents at the project site, which would represent a 0.5 percent increase in population in the Wilshire Area Community Police Station jurisdiction over existing conditions. The Los Angeles Police Department (LAPD) has stated that a project of this size would have a moderate impact on police services in the Wilshire area. As the Wilshire and La Brea Project is developed, tax revenues from property and sales taxes would be generated and deposited in the City’s General Fund and the State Treasury. A portion of these revenues would then be allocated to the City’s police department during the City’s annual budget process to maintain staffing levels within the City of Los Angeles in numbers adequate to serve project-related increases in service call demands.</p> <p>Secured entry and exit points, security fencing, security lighting, and other essential features would be introduced in the project. In order to help the Wilshire Community Plan Area commanding officers during responses to emergencies, the applicant would provide a diagram demonstrating access routes to each portion of the project site.</p> <p>With implementation of the recommended mitigation measures, impacts on police services would be reduced to a less than significant level.</p>	<p><b>MM- PP-3:</b> The project applicant shall contact LAPD’S Crime Prevention Unit to incorporate appropriate crime prevention features into the project design. Examples of crime prevention design features include the following:</p> <ul style="list-style-type: none"> <li>• Housing units can be designed so as to allow neighbors to “self-patrol” their environments.</li> <li>• Lighting and landscaping may be enhanced in parking lots to improve visibility.</li> <li>• Fences around housing developments can be designed in ways that avoid creating hiding places for criminals.</li> <li>• Signs can be removed from storefront windows to allow clear views in and out of the store.</li> <li>• Vines or planted coverings may be placed on walls to deter graffiti.</li> </ul> <p><b>MM- PP-4:</b> Upon completion of the project a diagram of each portion of the property, including access routes and any additional information that might facilitate police response, shall be submitted to the Wilshire Area commanding officer.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K. PUBLIC SERVICES (continued)</b>		
<b>1. Police Protection (continued)</b>		
<i>Operational Impacts (continued)</i>		
Both the project and other planned and approved developments throughout the City could cumulatively increase the need for services from the LAPD. This demand would be met by increases in law enforcement staffing and equipment as needed, which would be funded by increased revenues from the increased tax base generated by project residents. Therefore, through implementation of mitigation measures, the project would not result in potentially significant impacts.	See <b>MM-PP-1</b> through <b>MM-PP-4</b> .	Less Than Significant
<b>2. Fire Protection and Emergency Services</b>		
<i>Construction Impacts</i>		
Construction of the proposed project would result in the presence of work and delivery crews on the site; therefore, the potential for an increased demand on fire and emergency medical services exists during construction due to the introduction of activities and individuals which may generate new fire and emergency medical calls. The response distance during construction would remain within the performance standard listed in the Local Agency Fire Code (LAFC).	<p><b>MM-F-1:</b> Upon completion of the project, a diagram of each portion of the property, including access routes and any additional information that might facilitate fire and emergency medical response, shall be submitted to the fire chief.</p> <p><b>MM-F-2:</b> During project construction, the contractor shall ensure that roads and alleyways remain unobstructed to provide for emergency access at all times though the use of flagmen and other standard construction practices.</p>	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K. PUBLIC SERVICES (continued)</b>		
<b>2. Fire Protection and Emergency Services (continued)</b>		
<i>Operational Impacts</i>		
<p>Implementation of the proposed project would result in an increase in 1,220 new residents and approximately 135 new employees. As a result of this population increase, there would be an increase in demand for fire protection services for residential and commercial-related fire services.</p> <p>The response during the operation of the proposed project would remain within the performance standard of the LAFC.</p> <p>The closest fire station to the project is Fire Station 61, which is 0.6 mile away. According to the City of Los Angeles Fire Department, adequate staff, equipment, and fire protection services currently exist to meet the additional demands that would be generated through the implementation of the proposed project.</p> <p>Tax revenues from property and sales taxes would be generated and deposited in the City's General Fund and the State Treasury. A portion of these revenues would then be allocated to the City's Fire Department during the City's annual budget process to maintain staffing levels within the City of Los Angeles in numbers adequate to serve project-related increases in service call demands.</p>	<p><b>MM-F-3:</b> The project applicant shall coordinate with the LAFD to design and implement an upgraded fire hydrant in compliance with the LAFD Fire Code for high-density residential and neighborhood commercial developments.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K. PUBLIC SERVICES (continued)</b>		
<b>2. Fire Protection and Emergency Services (continued)</b>		
<i>Operational Impacts (continued)</i>		
<p>According to the LADWP, there is sufficient fire flow to four adjacent fire hydrants fronting the property to meet standard required by the LAFC. Due to the fact that only three of the four fire hydrants closest to the property are up to standard for the high-density residential and neighborhood commercial developments in the LAFC, project construction will result in significant impacts to fire service.</p> <p>With implementation of the recommended mitigation measures, impacts to fire protection services would be reduced to a less than significant level.</p>		
<i>Cumulative Impacts</i>		
<p>The project and other planned and approved developments throughout the City would cumulatively increase the need for services from the LAFD. This demand would be met by the increased tax base associated with the proposed project. Moreover, each project is subject to review by LAFD to ensure that an adequate emergency response exists and that adequate emergency site access is provided. Therefore, the project would not individually or cumulatively result in significant impacts to fire protection and emergency medical services.</p>	None required or recommended.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K. PUBLIC SERVICES (continued)</b>		
<b>3. Schools</b>		
<p>There are three planned Los Angeles Unified School District (LAUSD) campuses to be constructed in the Local District 3, within which the project site is located, which would alleviate overcrowding and ensure that the project would not result in significant impacts to schools. To further reduce any potentially significant impacts associated with the provision of school services, the project applicant is required to contribute school fees as mitigation.</p> <p>The proposed project has the potential to alter existing bus routes during both construction and operational phases, and project construction could affect students who walk to school. However, the implementation of several of the proposed mitigation measures would reduce these potentially significant impacts to less than significant levels.</p>	<p><b>MM-SCH-1:</b> As authorized by Senate Bill 50, the project applicant shall pay school impact fees to the LAUSD prior to the issuance of building permits.</p> <p><b>MM-SCH-2:</b> The project applicant shall contact the LAUSD Transportation Branch at (323) 342-1400 prior to construction to coordinate school bus access during construction.</p> <p><b>MM-SCH-3:</b> The project applicant shall maintain unrestricted access for school buses during construction.</p> <p><b>MM-SCH_4:</b> The project applicant shall comply with provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.</p> <p><b>MM-SCH-5:</b> The project applicant shall not endanger passenger safety or delay student drop-off or pick-up due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.</p> <p><b>MM-SCH-6:</b> The project applicant shall maintain safe and convenient pedestrian routes to LAUSD schools that are located adjacent to the project site.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K. PUBLIC SERVICES (continued)</b>		
<b>3. Schools (continued)</b>		
	<p><b>MM-SCH-7:</b> The project applicant shall maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.</p> <p><b>MM-SCH-8:</b> The project applicant shall install appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.</p> <p><b>MM-SCH-9:</b> The project applicant will require that material and delivery trucks serving the project site shall not haul past affected school sites, except when school is not in session. If that is infeasible, project applicant shall require that material and deliver trucks serving the project site shall not haul during school arrival and dismissal times.</p> <p><b>MM-SCH-10:</b> The project applicant shall not stage or park construction-related vehicles, including worker-transport vehicles, adjacent to school sites.</p> <p><b>MM-SCH-11:</b> The project applicant shall provide crossing guards when the safety of students may be compromised by construction-related activities at impacted school crossings.</p>	

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K. PUBLIC SERVICES (continued)</b>		
<b>3. Schools (continued)</b>		
	<p><b>MM-SCH-12:</b> The project applicant shall install barriers and/or fencing to secure construction equipment and the site in an effort to prevent trespassing, vandalism, and attractive nuisances.</p> <p><b>MM-SCH-13:</b> The project applicant shall provide security patrols to minimize trespassing, vandalism, and short-cut attractions.</p>	
<i>Cumulative Impacts</i>		
<p>Though the proposed project, along with surrounding projects, would increase student enrollment, and one of the schools which serves the project site is already operating over capacity, the new school construction planned by LAUSD and required school impact fees would mitigate these cumulative impacts to less than significant levels.</p>	<p>See <b>MM-SCH-1</b> through <b>MM-SCH-13</b>.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K PUBLIC SERVICES (continued)</b>		
<b>4. Recreation and Parks</b>		
<p>The open space and recreational amenities provided by the proposed project would meet the needs of the new residents that would be introduced by the proposed project as well as help reduce additional demand for public recreation facilities generated by the project-related population increase. The public open space and private recreation facilities included in the project design would not meet the needs of the residents of the project for neighborhood or community parks. The increase in local population generated by the project would incrementally increase the use of existing neighborhood and community parks in the Wilshire Community Plan Area. This increase would cause a significant impact due to the acceleration of the physical deterioration of existing parks within the vicinity of the project site. Therefore, incorporation of the proposed mitigation measure would reduce impacts to a less than significant level.</p>	<p><b>MM-REC-1:</b> In accordance with the requirements of the City of Los Angeles (Ordinance No. 141422, amending Chapter 1, Article 7, of the Los Angeles Municipal Code), the project applicant shall either pay the in-lieu fee to the City and/or develop public park or recreation land on the project site using equivalent funding or greater.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K PUBLIC SERVICES (continued)</b>		
<b>4. Recreation and Parks (continued)</b>		
<i>Cumulative Impacts</i>		
<p>Given the existing deficiency of parks and recreational facilities, both the individual project and the combined effects of the proposed projects in the Wilshire Community Plan Area on existing facilities is considered cumulatively significant because the use of existing facilities would increase, thus contributing to an acceleration in the physical deterioration of these facilities. The contribution of the proposed project to this impact is cumulatively considerable; however, through implementation of the <b>MM-K-21</b>, the project's individual contribution to the cumulatively significant impact would be mitigated to a less than significant level.</p>	<p>See mitigation measure <b>MM-REC-1</b>.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K PUBLIC SERVICES (continued)</b>		
<b>5 Library Services</b>		
<p>Implementation of the proposed project would introduce 1,220 residents to the area served by the Wilshire Branch Library. It is assumed that the 1,220 residents are new residents from outside the City limits and have not relocated from within the Los Angeles City limits. As the Wilshire Branch Library does not currently meet Los Angeles Public Library (LAPL) service standards, the addition of project-generated residents to the service area could result in a potentially significant impact. However, five other branch libraries are also located within 2 miles of the project site. As such, future residents of the project would have adequate access to additional library facilities. Therefore, the impacts on library services would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>K PUBLIC SERVICES (continued)</b>		
<b>5 Library Services (continued)</b>		
<i>Cumulative Impacts</i>		
<p>The proposed project and list of related projects would result in the addition of 9,045 residents. The addition of approximately 9,045 residents to the area served by the Wilshire Branch Library and other library branches through out the area would increase demand for library services in this portion of the City. However, as the related projects are scattered in a radius of approximately 2 miles around the project site, they may also be served by other libraries, including the Wilshire Library Branch and five other branches within 2 miles of the project site. For these reasons, library resources would be sufficient to serve related projects in combination with the proposed project and, therefore, potentially significant cumulative impacts to library services would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>L. TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION</b>		
<p><u>Future “With Project” Operation Impacts</u></p> <p>The proposed project would result in three intersections operating at LOS E or LOS F because these intersections would have a volume to capacity ratio (V/C) increase of greater than or equal to 0.01, during AM and/or PM peak hours, with project implementation.</p> <p>Seven of the 16 intersections that were analyzed would operate at LOS E or F for Future with Project Traffic Conditions. As such, there is a potential for conflicts between existing vehicular traffic and bicycle and pedestrians, resulting in possible significant impacts. With implementation of these mitigation measures, impacts would be reduced to less than significant levels.</p> <p>The proposed project is located within immediate access to an array of public transit opportunities; therefore, the project would not result in significant impacts to public transportation.</p> <p>The proposed project also would not result in significant impacts to parking availability because the proposed number of parking spaces would meet the applicable Los Angeles Municipal Code parking requirements. Finally, construction activities would not result in significant impacts to site access, pedestrian access, and closure of bus stops or loss of on-street parking.</p>	<p><b>MM-TRA-1:</b> La Brea Avenue and Wilshire Boulevard – As a condition of approval, the project shall upgrade the traffic signal system at the intersection of La Brea Avenue and Wilshire Boulevard to Adaptive Traffic Control System (ATCS) operation.</p> <p><b>MM-TRA-2:</b> Wilshire Boulevard and Highland Avenue – As a condition of approval, the project shall upgrade the traffic signal system at the intersection of Highland Avenue and Wilshire Boulevard to Adaptive Traffic Control System (ATCS) operation.</p> <p><b>MM-TRA-3:</b> 8<sup>th</sup> Street and La Brea Avenue – As a condition of approval, the project shall widen 8th Street to 40 feet in width between La Brea Avenue and Sycamore Avenue (widen by 7 feet along the north side and by approximately 3.5 feet along the south side). The project shall also install a westbound left-turn lane on 8th Street at La Brea.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>L. TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)</b>		
<p><u>Side-Street Intersections</u></p> <p>The potential for impacts to surrounding neighborhood streets was analyzed and it was determined that potential impacts to Sycamore Avenue would be less than significant due to an average daily trip (ADT) increase that would be below the threshold established in the City’s CEQA guidelines. Therefore, the traffic generated by the project would not create any significant traffic neighborhood impacts.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>L. TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)</b>		
<p><u>Construction Traffic</u></p> <p>The project would generate temporary traffic during construction from construction workers, haul trucks, and delivery vehicles. A total amount of approximately 163,000 cy of earth would be removed from the project site over a 120 day period, or an average of approximately 1,358 cy per day. Assuming a haul truck capacity of 14 cy per day, this equates to approximately 97 truckloads per day, or 194 trips (one inbound and one outbound trip per load). Adjusting upward by a 3.0 per trip passenger car equivalence (PCE) to reflect the larger size and limited maneuverability of trucks as compared to cars, this equates to approximately 582 trips.</p> <p>The current uses on the site, which would be discontinued prior to commencement of construction, would generate 770 daily trips and 1,285 adjacent trips. Therefore, temporary traffic impacts associated with hauling would be less than significant.</p>	<p><b>MM-TRA-4</b> Prior to commencing construction, the Applicant shall prepare a Construction Management Plan, including a Worksite Traffic Control Plan that shall contain, at a minimum, the following:</p> <ul style="list-style-type: none"> <li>• A 24-hour construction hotline that is monitored on a daily basis;</li> <li>• An up-to-date list of local police, fire and emergency response organizations and procedures for the coordination with such organizations of construction activities to reduce potential delays. Coordination shall include the assessment of alternative access routes to and from the project site that might be required due to unanticipated road conditions;</li> <li>• The location, times, and estimated duration of any roadway or sidewalk closures, traffic detours, and queuing area.</li> </ul> <p><b>MM-TRA-5</b> Flag persons shall be provided as necessary to minimize impacts on traffic flows and to ensure safe movement into and out of the project site.</p> <p><b>MM-TRA-6</b> Construction vehicles shall not be permitted to queue where they would interfere with traffic movement or block access to adjacent residences or businesses.</p> <p><b>MM-TRA-7</b> Haul trucks shall travel only on a haul route approved by the City that avoids local residential streets.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>L. TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)</b>		
<p><u>Cumulative Impacts</u>                      The project is expected to result in significant impacts to three intersections on its own or in combination with the 37 identified related projects; therefore, the potential exists for significant cumulative transportation impacts. However, as mitigation is proposed to reduce project related impacts to a less than significant level, the contribution of the project to these cumulative impacts would not be cumulatively considerable and is less than significant.</p>	<p>See MM-TRA-1 through MM-TRA-7.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS</b>		
<b>1. Water</b>		
<i>Operational Impacts</i>		
<p>The proposed project would increase water demand. The proposed project would demand approximately 92,807 gallons of water per day or 104 acre-feet of water per year. With the inclusion of water conservation measures, water demand associated with the project represents an increase of approximately 75 acre-feet of water per year over existing conditions. This represents a relatively small fraction (approximately 0.01 percent) of the projected water demand of 683,000 acre-feet that LADWP plans to meet by 2010 under average weather conditions. Therefore, the water demand generated by the proposed project is accounted for in LADWP's projections, which is confirmed by the Water Supply Assessment prepared by LADWP. In addition, the project is located in an urban area where adequate water infrastructure exists. As such, impacts associated with water service and infrastructure would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>1. Water (continued)</b>		
<i>Cumulative Impacts</i>		
<p>Using SCAG’s growth forecasts, LADWP has projected that there will be an adequate supply of water to accommodate anticipated growth for the next several decades. Given that the UWMP plans for water supplies to serve existing and projected needs, it is anticipated that the LADWP will be able to supply the demands of the proposed project and related projects through the foreseeable future, and no significant cumulative impacts related to water demand are anticipated. The LADWP states in the water supply assessment for the proposed project that adequate water supplies exist to meet the demands of the proposed project, as well as existing and planned future demands, and, therefore, the proposed project does not have the potential to result in potentially significant cumulative impacts on water supply.</p>	None required or recommended.	Less Than Significant
<b>2. Wastewater</b>		
<i>Construction Impacts</i>		
<p>Construction-related wastewater would not have a significant impact on wastewater disposal and treatment facilities due to the temporary nature of construction and expected low volumes of wastes.</p>	None required or recommended.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>2. Wastewater (continued)</b>		
<i>Operational Impacts</i>		
<p>The proposed project is estimated to generate 68,150 net gallons of wastewater per day or 0.068 million net gallons of wastewater per day, which represents an increase of approximately 0.02 percent over the daily volume of wastewater treated at the Hyperion Water Treatment Plant (HTP). As such, it is expected that the HTP has sufficient capacity to accommodate the project's wastewater, and impacts on wastewater treatment capacity would be less than significant.</p> <p>The City of Los Angeles Bureau of Engineering has indicated that existing lines serving the project site appear to have enough capacity to accommodate wastewater flows generated by the proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a sewer connection point. If local sewer lines have insufficient capacity then the developer will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. Given this requirement, impacts on sewage capacity would be less than significant.</p>	<p><b>MM-WW-1:</b> If local sewer lines have insufficient capacity then the developer shall be required to build a secondary line to the nearest larger sewer line with sufficient capacity.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>2. Wastewater (continued)</b>		
<i>Cumulative Impacts</i>		
<p>Development of the proposed project and related projects would increase development intensity and wastewater generation. Several improvements to the HTP system have recently been completed that have allowed the system to treat increased wastewater flows. In addition, each new development within the City of Los Angeles is required to comply with the City's water conservation ordinances and other regulations pertaining to sewer collection and disposal. Moreover, in 2006 the City adopted the Integrated Resources Plan to meet existing and future wastewater needs in the City through 2020. Therefore, there is no potential for cumulative impacts on wastewater.</p>	None required or recommended.	Less Than Significant
<b>3. Solid Waste</b>		
<i>Construction Impacts</i>		
<p>Wastes generated during demolition and construction would result in an incremental and intermittent increase in solid waste disposal at landfills and other waste disposal facilities under the jurisdiction of the City of Los Angeles. No new facilities would be required as a result of project construction. Therefore, there is no potential for significant impacts with regard to the generation of solid waste by construction activities.</p>	None required or recommended.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>3. Solid Waste (continued)</b>		
<i>Operational Impacts</i>		
<p>Operation of the proposed project would generate a net increase of approximately 8,616 pounds per day, or about 1,574 tons per year, of solid waste. It has been determined by the City Bureau of Sanitation that the tonnages generated by the proposed project would not have any appreciable impact on the regional solid waste system. No new solid waste facilities would be required as a result of project implementation. Therefore, there is no potential for significant impacts on solid waste from the operation of the proposed project.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>3. Solid Waste (continued)</b>		
<i>Cumulative Impacts</i>		
<p>The City of Los Angeles Solid Waste Management Plan sets forth strategies that would provide adequate landfill capacity through 2020 to accommodate anticipated growth, based on SCAG's projections. The growth associated with the project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's Source Reduction and Recycling Element (SRRE). Overall, the source reduction and recycle efforts laid out in the SRRE have been extremely successful in diverting waste from area landfills.</p> <p>As of 2002, the City had achieved a waste diversion rate of 63 percent, thus exceeding the state-mandated diversion goal of 50 percent by 2000 set by the California Integrated Waste Management Board (CIWMB) of 1989. The Bureau of Sanitation has developed a strong waste management infrastructure over the last decade. Through both City and private sector efforts, a myriad of innovative source reduction, reuse, recycling and composting programs have been implemented. The City is now striving for a 70 percent diversion rate by 2020. New programs are being implemented to increase the amount of waste diverted by the City to help meet waste reduction and recycling goals. Impacts would be less than significant.</p>	None required or recommended.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>4. Energy</b>		
<p><b><u>Electricity - Operational Impacts</u></b></p> <p>The estimated total electricity consumption from the proposed project is anticipated to be approximately 4,043,043 kilowatt-hours (kWh) per year. Project design would be required to comply with Sections of the State Building Energy Efficiency Standards, contained in Title 24 of the California Code of Regulations. The LADWP has determined that the distribution system is adequate to supply the project's needs. Therefore, the proposed project would result in a less than significant impact on power consumption.</p> <p>Electrical infrastructure currently exists throughout the project area. Implementation of the proposed project would not result in the need for additional off-site infrastructure in order to provide needed electrical supplies. Therefore, impacts would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>4. Energy (continued)</b>		
<p><b><u>Electricity - Cumulative Impacts</u></b></p> <p>The proposed project in combination with the related projects would cause an additional electricity demand estimated at 35,998,438 kWh of electricity per year. Based on this increase in demand, LADWP has indicated that the cumulative effects of the project and other added loads would require near term and/or future additions to distribution system capacity. In accordance with current building codes and conservation standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. Compliance with Title 24 energy standards and other energy conservation programs on the local level would further reduce cumulative energy demands. Therefore, implementation of the proposed project in combination with related projects would not result in cumulative significant impact to energy supplies or the energy distribution system, and the contribution of the project to the impact would not be cumulatively considerable.</p>	None required or recommended.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>4. Energy (continued)</b>		
<p><b><u>Natural Gas - Operational Impacts</u></b></p> <p>The estimated total natural gas consumption for the proposed project is anticipated to be approximately 46,514,760 cubic feet per year. According to the Gas Company, the existing system will be able to meet the proposed project’s load based on the above assumptions. The system can also be modified to meet loads that are much higher than the projected gas consumption by the proposed project, as the Gas Company will make improvements to their system to meet customer obligations if needed. Therefore, the proposed project would not result in significant impacts to gas service.</p> <p>Natural gas infrastructure currently exists throughout the project area. Implementation of the proposed project would not result in the need for additional off-site infrastructure in order to provide needed natural gas supplies. Therefore, impacts would be less than significant.</p>	<p>None required or recommended.</p>	<p>Less Than Significant</p>

Project Impacts	Mitigation Measures	Significance After Mitigation
<b>M. UTILITIES AND SERVICE SYSTEMS (continued)</b>		
<b>4. Energy (continued)</b>		
<p><b><u>Natural Gas – Cumulative Impacts</u></b>                      The proposed project and related projects would demand additional 29,506,250 cubic feet of natural gas per month. As previously indicated the distribution system in the project area is flexible and can be modified to provide adequate supply to meet increased demand as a result of cumulative projects. Each project would also be required to incorporate applicable energy conservation features into its design. As such, implementation of the proposed project in combination with related projects would not result in cumulative significant impact to natural gas supplies, and the contribution of the project to the impact would not be cumulatively considerable.</p>	None required or recommended.	Less Than Significant

Source; Impact Sciences, January 2009.

## J. DESCRIPTION OF ALTERNATIVES TO THE PROPOSED PROJECT

The principal purpose of alternatives is to define specific strategies that would reduce the magnitude of, or eliminate, potential project-related environmental impacts.

The *State CEQA Guidelines* stipulate that alternatives addressed in an EIR should be feasible and should not be considered remote or speculative. The *State CEQA Guidelines* state that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries and whether the applicant can reasonably acquire, control or otherwise have access to the alternative site.”

In response to the criteria outlining requirements for an alternatives analysis, four alternatives have been selected and evaluated for the proposed project.

- Alternative 1 – No Project, No Build Alternative
- Alternative 2 – No Project, Existing Zoning and General Plan
- Alternative 3 – Reduced Density
- Alternative 4 – No Subterranean Parking

### 1. Alternative 1 – No Project Alternative

Section 15126.6(e) of the *State CEQA Guidelines* require that a No Project Alternative be evaluated. As described in the *State CEQA Guidelines*, the purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

Under the No Project Alternative, the project site would remain in its existing condition, and the proposed project would not be implemented. The existing church, commercial strip center and surface parking lots would be reused and would not be demolished.

Implementation of the No Project, No Build alternative would avoid most of the environmental impacts associated with the proposed project; however, under this alternative, greater impacts associated with hazards and hazardous materials would occur, as known hazards would not be removed from the project site. Further, this alternative would not meet any of the project objectives. Therefore, since the No Project, No Build alternative would result in greater impacts to hazards and hazardous materials and land use in comparison to the proposed project, this alternative is not considered environmentally superior.

## 2. Alternative 2 – No Project, Existing Zoning and General Plan

The No Project, Existing Zoning and General Plan Alternative, assumes no general plan amendment and zone/height district change would be sought. Instead, development of the site would conform to existing land use and height regulations permitted under the current general plan and zoning and height district designations for the project site. The primary differences between this alternative and the proposed project is that under this alternative (a) the portion of the site located along Wilshire Boulevard north of the existing alley zoned [Q]C4-2-CDO would be developed with a commercial office tower with ground floor retail/restaurant uses at an FAR of 6:1, (b) the C2-1 zoned portion of the site along La Brea Avenue would be developed with a retail center at an FAR of 1.5:1, and (c) the [Q]C2-1 zoned portion of the site adjacent to Sycamore Avenue would be developed with multi-family residential uses at a density of 2,500 square feet of lot area per dwelling unit and an FAR of 1.5:1. Except for the proposed general plan amendment and zone/height district change, this alternative would require the same other discretionary and ministerial actions associated with the proposed project.

This alternative would result in the development of a 14-story, 209-foot-tall office tower containing approximately 199,088 square feet of office uses, 5,000 square feet of retail, and 5,000 square feet of restaurant uses on the northern third of the project site; a 2-story, 40-foot-tall, 72,526-square-foot retail/restaurant center along La Brea Avenue south of the alley; and 21 3-story, 33-foot-tall townhomes along Sycamore Avenue south of the alley. Under this alternative, all on-site buildings would be demolished and removed.

Implementation of this alternative would not avoid short-term significant impacts to air quality and noise. In addition, this alternative would not avoid or substantially reduce the proposed project's less than significant impacts associated with visual resources, geology, hazards and hazardous materials, hydrology and water quality, land use, noise (operational), public services, transportation, and public utilities as compared to the proposed project. As such, Alternative 2 avoids none of the significant environmental impacts and would only partially meet some of the project objectives, in comparison with the proposed project. Therefore, this alternative is not considered environmentally superior, since neither the proposed project nor this alternative would significantly reduce impacts associated with development of the project site.

## 3. Alternative 3 – Reduced Density

The Reduced Density Alternative considers development of the entire 3.4-acre site at approximately 75 percent of the density of residential and commercial uses under the proposed project. Under this alternative, all on-site buildings would be demolished and removed. The layout for the land uses

proposed under this alternative would be the same as for the proposed project, and would result in the development of 422 apartment units, 27,750 square feet of retail space, and 6,000 square feet of restaurant space. Under this alternative, the finger and bar residential structures would be constructed at a height of 75 feet and 33 feet, respectively. All discretionary and ministerial actions associated with the proposed project, including a general plan amendment and zone/height district change, would remain the same. Under this alternative, all on-site buildings would be demolished and removed.

Implementation of this alternative would not avoid short-term significant impacts to air quality and noise. In addition, this alternative would not avoid or change the significance of impacts associated with visual resources, geology, hazards and hazardous materials, hydrology and water quality, land use, noise (operational), public services, transportation, and public utilities as compared to the proposed project. As such, Alternative 3 avoids none of the significant environmental impacts while only partially meeting some of the project objectives, in comparison with the proposed project. Therefore, this alternative is not considered environmentally superior, since neither the proposed project nor this alternative would significantly reduce impacts associated with development of the project site.

#### **4. Alternative 4 – No Subterranean Parking**

Under the No Subterranean Parking Alternative, the site would be developed with the same uses and densities as the proposed project. However, in order to reduce significant short-term construction noise and air quality impacts, all parking would be constructed at or above grade. As this alternative would not include subterranean parking, the amount of excavation and associated noise and emissions would be less than under the proposed project.

Under this alternative, the finger and bar residential structures would be constructed at a height of 135 feet and 79 feet, respectively, because the parking would be at or above grade. All discretionary and ministerial actions associated with the proposed project, including a general plan amendment and zone/height district change, would remain the same. Under this alternative, all on-site buildings would be demolished and removed.

Implementation of this alternative would not avoid short-term significant impacts to air quality and noise. In addition, this alternative would not avoid or change the significance of impacts associated with visual resources, geology, hazards and hazardous materials, hydrology and water quality, noise (operational), public services, transportation, and public utilities as compared to the proposed project. While Alternative 4 would not avoid significant environmental impacts associated with air quality and noise, this alternative would lessen the overall amount of air quality emissions generated during the duration of construction associated with development of the project site. However, the greater height of

the buildings and the increased scale, bulk and mass of the building on Sycamore Avenue would create greater impacts with regard to aesthetics and historical resources.

## 7. Environmentally Superior Alternative

Section 15126.6(e)(2) of the *State CEQA Guidelines* indicates that an analysis of alternatives to the proposed project shall identify one alternative as the environmentally superior alternative. Furthermore, if the environmentally superior alternative is the No Project Alternative; the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Of the remaining alternatives, implementation of Alternative 4 (No Subterranean Parking) would result in similar environmental impacts to those of the proposed project. From an environmental perspective, this alternative is superior to the proposed project as it reduces the level of impacts associated with significant unavoidable air quality impacts associated with construction. However, the greater height of the buildings and the increased scale, bulk, and mass of the building on Sycamore Avenue may result in significant impacts to aesthetics and historical resources. Furthermore, Alternative 4 would not meet the project objective to develop the site with structures that are compatible with existing residences to the east in terms of scale, mass, and bulk as well as the proposed project. The decision makers will take these factors into account when determining the feasibility of this alternative, and may reject this alternative if it finds that economic viability, availability of infrastructure, general plan consistency, other consistency with other plans or regulatory limitations render the alternative infeasible.