

## EXPLANATION OF CHECKLIST DETERMINATIONS

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### I. AESTHETICS

#### a. Would the project have a substantial adverse effect on a scenic vista?

**Less Than Significant Impact.** The topography in the vicinity of the proposed project is flat with views that are primarily urban in nature. Public views from the adjacent freeway corridors are dominated by STAPLES Center and the Los Angeles Convention Center, as well as the downtown skyline. The predominant visual focus from local streets in the area is STAPLES Center and the Convention Center. Private views are typically of short-range mixed-use developments as well as STAPLES Center and the Convention Center buildings. The new development would replace existing buildings and surface parking lots with urban uses that may impede certain scenic vistas at points. Design features such as screening and landscaping may be used to minimize such significant impacts.

Conclusion: Although the proposed project is not expected to have a significant impact on scenic vistas in the area, the issue will be analyzed and documented in an Environmental Impact Report.

#### b. Would the project substantially damage scenic resources within a city designated scenic highway?

**No Impact.** The northern portion of the Harbor Freeway (I-110) is designated a California Historic Parkway as well as a City of Los Angeles Scenic Highway (the Arroyo Seco Parkway). However, that portion of the I-110 that runs along the western boundary of the proposed Project has no similar designation and, as such, project development will not affect any scenic resources from scenic highways.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

#### c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

**Potentially Significant Unless Mitigated.** The project includes new structures which could potentially affect the visual environment in this area of the City. Elements of the new development such as on-site signage, including illuminated signs, could also affect the aesthetic quality of the site and surrounding areas. However, the new development would replace existing surface parking lots and buildings with retail, entertainment, and hotel uses. An examination of this issue to determine the visual impact of the proposed development on the surrounding area is appropriate. Design features and mitigation, such as screening with fencing and landscaping, may be used to minimize potential significant impacts.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

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

**Potentially Significant Unless Mitigated.** The proposed project may increase the number of light sources on-site by adding illuminated building and event signage, special effects, security lighting, and parking lot lighting. The impact of light and potential glare can be mitigated by such measures as use of low-intensity lights and/or lighting shields or other design features which direct light into on-site project areas.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

## **II. AGRICULTURAL RESOURCES**

**a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown the maps prepared pursuant to the Farmland Mapping Monitoring Program of the California Resources Agency, to non-agricultural uses?**

**No Impact.** No agricultural resources or operations exist on the project site or adjacent properties, which are either vacant or support industrial or public facility uses. Nor is the project site designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**b. Would the project conflict with existing zoning for agricultural use, or Williamson Act contract?**

**No Impact.** The proposed project site is not within an agricultural zone (A1). The project site is zoned for General Commercial (C2-4D) and Qualified Multiple Dwelling ([Q]R5-4D). The area is highly urbanized and no agricultural operations are present on the site or adjacent to the project site. Consequently, no lands on the proposed project site are enrolled under the Williamson Act and no conflict with Williamson Act contracts exist. Therefore no impact to existing zoning for agricultural use or a Williamson Act contracts would occur.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**c. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?**

**No Impact.** As stated in Response II.a, no agricultural resources or operations exist on the project site or adjacent properties. The project site and adjacent properties support commercial, industrial, commercial recreational, parking, and residential uses or are vacant. Therefore, no changes in the existing environment which would result in conversion of farmland to non-agricultural uses would occur.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

### **III. AIR QUALITY**

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

**Potentially Significant Unless Mitigated.** The SCAQMD's Air Quality Management Plan (AQMP) sets forth policies and programs which achieve attainment of all air pollutant standards at the earliest possible date. The air emissions generated by the project may contribute to a delay in the timely attainment of air quality standards or the interim emissions reductions specified in the Air Quality Management Plan (AQMP).

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Potentially Significant Unless Mitigated.** The project may have potentially significant impacts on air quality by way of: 1) construction emissions, including but not limited to, PM<sub>10</sub> (particulate matter that is less than 10 microns in diameter); 2) regional stationary source (gas and electricity consumption) emissions; 3) regional mobile source emissions; and 4) local mobile source (CO) emissions. An analysis of air quality impacts from these sources will investigate and recommend appropriate measures to reduce the project's significant impacts. All quantitative analysis shall be conducted in accordance with the procedures set forth by the SCAQMD and the California Air Resources Board.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed to the degree technically feasible.

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

**Potentially Significant Impact.** The local air basin is currently classified as non-attainment for ozone precursors (i.e., reactive organic compounds and nitrogen oxides) and carbon monoxide. As the project will generate emissions of these pollutants, a potential impact may occur. All analyses will be conducted in accordance with the procedures set forth by the SCAQMD and the California Air Resources Board.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**d. Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Unless Mitigated.** Due to the potential air emissions sources identified in Response III.b above, the project could have a potentially significant impact to the air quality at sensitive receptor locations. Sensitive receptors will be identified and an analysis of specific air quality effects at any identified sensitive receptor locations will be evaluated.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**e. Would the project create objectionable odors affecting a substantial number of people?**

**No Impact.** The operation of the proposed project would not emit new objectionable odors on the project site or in the vicinity. Construction of the proposed project would involve activities and the use of equipment typical of development projects of similar size and type, and would not create objectionable odors. Application of codes and regulations would further insure that no significant impacts regarding the creation of objectionable odors would occur.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

#### **IV. BIOLOGICAL RESOURCES**

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

**No Impact.** The proposed project is located within a highly urbanized area and is essentially void of natural vegetation and wildlife. The on-site vegetation is generally introduced ornamental landscaping. Only a limited number of plant species that flourish in urban environments can be found on-site, none of which are considered rare or endangered. Animal species using this area are limited to common birds and small terrestrial species that are habitat generalists and readily adapt to urban settings. Therefore, the proposed project would not result in significant impact to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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

**No Impact.** The proposed project is currently developed with urban uses. There are no riparian habitat or other sensitive natural community on or adjacent to the project site. Accordingly, the project would have no impact.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** The project site consists of graded, level ground. There are no existing natural sources of water or wetlands on or adjacent to the project site. Therefore, the project would have no impact.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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

**No Impact.** The proposed project is located within a highly urbanized area and does not contain any wildlife migration corridors or wildlife nursery sites. Therefore, the project would have no impact.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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

**No Impact.** The project site is highly urbanized and is essentially devoid of native vegetation and biological resources. Therefore, there are no preservation policies or ordinances in place which include the project area and no impact would occur.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?**

**No Impact.** There are no habitat conservation plans in place which include the proposed project area and no impact would occur.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**V. CULTURAL RESOURCES**

**a. Would the project cause a substantial adverse change in significance of a historical resource as defined in CEQA?**

**Potentially Significant Unless Mitigated.** No historic structures are present on the proposed project site. However, potentially historic structures may be present in the vicinity of the proposed project site. All potentially historic resources would be identified and evaluated in accordance with applicable federal, State, and local laws and regulations.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**b. Would the project cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA?**

**Less Than Significant Impact.** The project site has been previously disturbed through grading and development. There are no known archaeological resources on the project site. While no further evaluation of this issue is recommended, periodic monitoring during construction and excavation activities, consistent with standard City of Los Angeles Conditions of Approval, is recommended.

Conclusion: No further analysis of this issue is recommended and no further mitigation measures would be required.

**c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant Impact.** The project site has been previously graded and developed. The site is within a resource sensitivity area of surface sediments with unknown fossil potential.<sup>1</sup> However, there are no known paleontological resources on the project site. While no further evaluation of this issue is recommended, periodic monitoring during construction and excavation activities, consistent with standard City of Los Angeles Conditions of Approval, is recommended.

Conclusion: No further analysis of this issue is recommended and no further mitigation measures would be required.

**d. Would the project disturb any human remains, including those interred outside of formal cemeteries?**

**Less Than Significant Impact.** The project site has been previously graded and developed and contains no known human remains. While no further evaluation of this issue is recommended, periodic monitoring during construction and excavation activities, consistent with standard City of Los Angeles Conditions of Approval, is recommended.

Conclusion: No further analysis of this issue is recommended and no further mitigation measures would be required.

## **VI. GEOLOGY AND SOILS**

**a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

**(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map?**

**Potentially Significant Unless Mitigated.** Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. Active and potentially active faults which are deemed capable of producing fault

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<sup>1</sup> *City of Los Angeles Planning Department, Los Angeles Citywide General Plan Framework, GIS Maps, February 1995.*



rupture due to seismic activity have ground rupture potential and may be expected to generate movement at the surface ranging from a few inches to approximately six feet. The City has placed approximately one-eighth mile fault study zones, known as Fault Rupture Study Zones, on each side of these potentially active and active faults to establish hazard potential.<sup>2</sup> The State, for purposes of planning, zoning, and building regulation functions, provides maps to city and county agencies designating Alquist-Priolo Earthquake Fault Zones. The proposed project site is not located within a city-designated Fault Rupture Zone or State-designated Alquist-Priolo Earthquake Fault Zone. Therefore, the risk of surface rupture due to faulting is considered remote. In addition, proposed development on the project site would comply with all applicable City building guidelines, restrictions, and permit regulations, which include requirements designed to minimize potential significant impacts during seismic events. Therefore, development of the proposed project would not expose people to significant impacts involving seismicity-related fault rupture.

Conclusion: Although the proposed project is not located within a city- or State-designated fault zone and the risk of significant impacts involving seismically-related fault rupture is remote, this issue will be analyzed and documented in an Environmental Impact Report.

## **(ii) Strong seismic ground shaking?**

**Potentially Significant Unless Mitigated.** The project site is located within the seismically active Southern California region. All of Southern California is subject to some degree of ground shaking due to earthquakes. The entire project site is located in an area that has a moderate potential impact for ground shaking. However, as noted in Response VI.a.2, the project site is not within an Alquist-Priolo Earthquake Fault Zone. All on-site development would be in compliance with the City Building Code, which contains requirements and standards designed to limit potential significant impacts due to seismic events to acceptable levels. Therefore, development of the proposed project would not expose people to significant impacts related to seismic/ground shaking hazards.

Conclusion: Although the project would not result in a significant impact with regard to seismic ground shaking, this issue shall be analyzed and documented in an Environmental Impact Report.

## **(iii) Seismic-related ground failure, including liquefaction?**

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<sup>2</sup> *City of Los Angeles Planning Department, Los Angeles Citywide General Plan Framework, GIS Maps, March 1994.*

**Less Than Significant Impact.** The project site is not within an Alquist-Priolo Earthquake Fault Zone, nor is it in an area of high susceptibility to ground failure or liquefaction. In addition, all on-site development would be in compliance with the City Building Code, which contains requirements and standards designed to limit potential significant impacts due to seismic events to acceptable levels. Therefore, development of the proposed project would not expose people to significant impacts related to ground failure, including liquefaction.

Conclusion: Although the project would not result in a significant impact with regard to ground failure, including liquefaction, this issue shall be analyzed and documented in an Environmental Impact Report.

**(iv) Landslides?**

**Less Than Significant Impact.** The project site is located on essentially level ground, however, the adjacent slope of the Harbor Freeway (I-110) rises adjacent to the proposed project's western boundary. No grading or modifications are anticipated which would affect the Harbor Freeway and no other hillside areas (greater than 15% slope) or areas of landslide potential exist on or adjacent to the proposed project site.<sup>3</sup> Therefore, development of the proposed project would not expose people to significant impacts related to landslides.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**b. Would the project result in substantial soil erosion or the loss of topsoil?**

**Potentially Significant Unless Mitigated.** Although project development has the potential to result in erosion of soils during site preparation and construction activities, the potential would be reduced by implementation of stringent erosion controls imposed via grading and building permit regulations. Minor erosion and siltation could occur during project grubbing and grading. However, the potential for soil erosion during the ongoing operation of the proposed project is relatively low due to the generally level topography of the development area on the project site. Further, adherence to the General Permit for Storm Water Discharge and project Storm Water Pollution Prevention Plan (SWPPP) is anticipated to reduce the potential for such significant impacts. With implementation of the applicable grading and building permit requirements and adherence to relevant plans, no significant impacts would occur related to erosion or loss of topsoil.

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<sup>3</sup> *City of Los Angeles Planning Department, Los Angeles Citywide General Plan Framework, January, 1995.*

Conclusion: No further analysis of this issue is recommended and no additional mitigation measures would be required.

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

**Less Than Significant Impact.** The project site is generally level and has been previously developed with a variety of uses. No designated hillside areas (greater than 15% slope) or areas of landslide potential are located in or around the project site. Additionally, the groundwater levels encountered in the vicinity of the proposed project present a low susceptibility to failure from liquefaction. The project site is located within a State-designated oil field, indicating a potential hazard for subsidence. However, there are no active wells located on the site or within one-quarter mile of the site, which reduces the potential for significant impacts related to this prior use. Any remaining potential impact related to subsidence would be further reduced through implementation of State and federal regulations as well as adherence to the Building Code and Department of Building and Safety Standards.

Conclusion: Although potential significant impacts resulting from subsidence would be avoided by compliance with applicable codes, regulations, and standards, this issue will be evaluated and documented in an Environmental Impact Report.

- d. Would the project be located on expansive soil, creating substantial risks to life or property?**

**Less Than Significant Impact.** All on-site construction would comply with current Building Code requirements which limits significant impacts related to expansive soils to less than significant levels. If on-site soils are determined to have substantial shrink-swell potential, appropriate engineering solutions would be incorporated into the project to avoid this potential.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

- e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No Impact.** The proposed project site is located in a highly urbanized area that includes sewer infrastructure. Therefore, no need exists for the use of septic tanks or alternative wastewater disposal systems on site.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

## **VII. HAZARDS AND HAZARDOUS MATERIALS**

### **a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Potentially Significant Unless Mitigated.** The proposed project could involve the handling, storage, use, transport, or disposal of potentially hazardous materials, including oil, paints, pesticides, and other chemicals. The proposed project would be designed and operated to ensure the safety of employees, visitors, and the surrounding population. Potentially hazardous substances located on-site would be managed in accordance with all applicable regulations, including the California Health and Safety Code. The storage and handling of commercial cleaning and landscape materials would be limited to those products commonly associated with routine building and property maintenance activities and would be managed in accordance with applicable regulations. Further, State law requires that site use and storage of hazardous materials be reported to the County of Los Angeles in the form of a Hazardous Materials Business Plan (HMBP). In compliance with these State regulations, the Applicant would be required to file a HMBP with the Los Angeles County Fire Department (LACFD), which inventories the types and locations of hazardous materials stored or used on-site. The HMBP provides emergency safety measures to respond to potential emergencies that may occur during the course of operations at the facility including; direction for activities in the event of an emergency, evacuation routes, and a hazardous materials inventory. The LACFD reviews the HMBP to ensure that all materials will be stored and handled properly. Furthermore, the LACFD's Area Unit will perform annual inspections and the local fire station will perform separate informal inspections annually to ensure that all hazardous materials are being handled and stored properly during project operation. Notwithstanding the anticipated compliance with all of the applicable codes and regulations, significant impacts related to the transport, use, or disposal of hazardous materials may occur.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate.

**b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Potentially Significant Unless Mitigated.** Prior to construction, the few remaining buildings and related equipment on the site would be demolished and removed. During demolition, grading, and construction of the proposed project, there would be typical worker safety risks associated with the use of construction equipment and exposure to potentially toxic construction materials. Compliance with Federal and State Occupational Safety and Health Act (OSHA) regulatory requirements would reduce potential construction-related risks to less than significant levels.

There is the potential for lead based paints and Asbestos-Containing Building Materials (ACBMs) in the building roofing, floor and ceiling tile, and other structural materials on the project site. Prior to demolition of the on-site buildings, an asbestos survey would be required and any ACBMs would be removed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1403. During demolition, mandatory compliance with applicable standards and procedures required by OSHA, the United States Environmental Protection Agency (EPA) and the South Coast Air Quality Management District (SCAQMD) would reduce the potential for the proposed project to result in the exposure of people to existing health hazards from building materials to less than significant levels. Mandatory compliance with applicable standards and procedures would reduce potential risks associated with lead based paints and ACBMs to less than significant levels.

Operation of the proposed project could involve the handling, storage, use, and disposal of potentially hazardous materials. The proposed project would be designed and operated to ensure the safety of employees, customers, and the surrounding population, and potentially hazardous substances located on-site would be managed in accordance with all applicable regulations. Notwithstanding the adherence to all of the applicable regulations, codes, and permitting requirements, the project may create a significant hazard to the public or the environment through an unanticipated upset or accident involving the release of hazardous materials.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate.

**c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Potentially Significant Unless Mitigated.** Any existing or proposed schools located within one-quarter mile of the proposed project would be identified and potential significant impacts related to hazardous materials will be evaluated. As noted in Response VII.a and VII.b, applicable codes, regulations, and permitting requirements are in place for reducing potential significant impacts related to hazardous materials to less than significant levels.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate.

**d. Would the project be located on a site which is included on a list of hazardous materials sites and, as a result, would create a significant hazard to the public or the environment?**

**Less Than Significant Impact.** The proposed project site includes areas that were previously used as commercial and/or industrial sites that may have involved the storage, handling, blending and distribution of materials with the potential, if spilled, to contaminate on-site soils. Additionally, these sites may have also contained lead-based paints and asbestos containing building materials (ACBM). Considerable site abatement was completed across the entire proposed project site during the construction of STAPLES Center and associated parking improvements, which was completed in 1999. While this prior abatement was conducted in full compliance with applicable local, state and federal regulations, subsurface contaminants, in particular, could be released during additional on-site excavation and demolition. Such contaminants could be released during on-site excavation and demolition. Any further required remediation of identified contamination would be conducted prior to new construction on-site and the potential exposure to health hazards after remediation will be evaluated and documented in the EIR. Further, although all on-site demolition would be conducted in accordance with South Coast Air Quality Management District regulations pertaining to the handling of ACBM, safety issues related to the potential release of of ACBM resulting from demolition or transport activities will also be evaluated and documented in the EIR. Any potential significant impacts related to the project's proximity to the Los Angeles downtown oil fields shall be identified and evaluated.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate.

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

**No Impact.** The project is not located within an airport land use plan or within two miles of an airport. Therefore, no significant impacts would occur.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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

**No Impact.** The project is not located within the vicinity of a private airstrip. Therefore, no significant impacts would occur.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** Project implementation would result in the occasional closure of 11th Street between the Harbor Freeway and South Figueroa Street to accommodate special events and pedestrian-oriented gatherings. This occasional street closure may impact existing evacuation routes and adopted emergency response plans which utilize this portion of 11th Street. Beyond this, any physical changes to streets in the area would be improvements designed to accommodate project-generated traffic. Internal access on the project site would be designed in accordance with City of Los Angeles Fire Department standards. Adherence to existing standards would ensure that the proposed project would have no substantive impact on an adopted emergency response or evacuation plan.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate.

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

**No Impact.** The proposed project site is located in an urbanized area and there are no wildlands in the vicinity of the site. Landscaping in and around the project site is irrigated and is

not considered a fire hazard. Accordingly, no significant impacts related to wildland fires would occur.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

## **VIII. HYDROLOGY AND WATER QUALITY**

### **a. Would the project violate any water quality standards or waste discharge requirements?**

**Potentially Significant Unless Mitigated.** During storm events, the project site discharges directly into the City of Los Angeles storm drain system. During construction, the proposed project could cause minor erosion due to grading and temporary soil storage activities which could result in limited increases in the silts and soils loadings. The site's level character would minimize such potential. Stringent erosion controls are imposed via compliance with City administration of Countywide NPDES permits for runoff during the construction process, as required. These controls would reduce the potential for eroded materials to affect surface water quality to less than significant levels. Thus, implementation of the proposed project would not create a significant impact as a result of discharge into surface waters, or in any alteration of surface water quality.

Conclusion: In spite of the above controls, this issue would be analyzed further and in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate.



- b. Would the project substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been guaranteed)?**

**No Impact.** The project would not involve any deep excavation that would have the potential to intercept existing aquifers, nor would it involve direct additions or withdrawals of groundwater. Therefore, project development would not impact groundwater supplies or groundwater recharge.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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

**Potentially Significant Unless Mitigated.** The project vicinity consists nearly entirely of impervious surfaces. Although the proposed project has the potential to alter the existing on-site drainage pattern and cause the erosion of soils during construction activities, this would not be expected to result in substantial erosion or flooding on-or off-site due to stringent controls imposed via grading and building permit regulations. Surface runoff volumes are not anticipated to substantially increase following project implementation. Drainage improvements implemented as part of the proposed project, in conjunction with the existing drainage facilities, would be able to accommodate the runoff from the project site. Therefore, construction and implementation of the proposed project would not result in substantial erosion or increased runoff that would impact on- or off-site areas.

Conclusion: However, further analysis of this issue will be conducted in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate

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

**Less Than Significant Impact.** The project site is essentially level and currently largely developed with impervious surfaces (i.e., paved surfaces, buildings, etc.). Surface flows which are

not absorbed on-site drain off-site into adjacent surface streets, gutters and storm drains. The project may incrementally increase the total impervious surface area of the project site and, therefore, could increase overall surface runoff from the site. However, surface runoff volumes are not anticipated to substantially increase following project implementation. Project drainage improvements such as catch basins, roof drains, and surface parking lot drains would be designed to discharge into the existing system. Therefore, implementation of the proposed project would not substantially alter the existing drainage pattern or result in substantially increased runoff that would impact on- or off-site areas.

Conclusion: Although the proposed project is not expected to substantially alter the existing drainage pattern of the site or area, this issue will be analyzed and documented in an Environmental Impact Report.

**e. Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Less Than Significant Impact.** As discussed in Response VIII.c and VIII.d, surface runoff volumes are not anticipated to substantially increase following project implementation and runoff would continue to discharge into the existing system. Drainage improvements implemented as a result of the proposed project, in conjunction with the existing drainage facilities, would be able to accommodate the run-off from the project site. Further, with implementation of stringent controls imposed via grading and building permit regulations, potential significant impacts related to polluted runoff would be less than significant.

Conclusion: Although the proposed project would not contribute to runoff water that would exceed the capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff, this issue shall be analyzed and documented in an Environmental Impact Report.

**f. Would the project otherwise substantially degrade water quality?**

**Less Than Significant Impact.** As discussed in Response VIII.a, the proposed project would not result in a violation of any water quality standards or waste discharge requirements. While the potential exists for siltation and conveyance of pollutants during the project construction phase, compliance with applicable State and local regulations governing water quality, including the General Permit for Storm Water Discharge and the Storm Water Pollution Prevention Plan (SWPPP), would reduce the potential for significant impacts related to potential discharge into surface water, or changes in water quality, to less than significant levels. Therefore, implementation of the proposed project would not substantially degrade water quality.

Conclusion: No further analysis of this issue is recommended and no additional mitigation measures would be required.

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

**Less Than Significant Impact.** The project site is not within an area of the City that is subject to flooding during 100-year and 500-year storm events (i.e., a rain storm with a chance of occurring in any given year of one percent and a 0.2 percent, respectively). The 100-year flood zone is used as the benchmark in administering the National Flood Insurance Program. Because the site is outside both the 100- and 500-year flood plains<sup>4</sup>, no significant flooding of the site is anticipated. Further, the project site is located in a developed area with major existing storm drainage infrastructure in place. Storm drains and flood control channels in the area are designed to accommodate a maximum storm event that would be expected to occur in the project area.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**h. Would the project place within a 100-year flood plain structures which would impede or redirect flood flows?**

**Less Than Significant Impact.** No part of the project or structures are within a 100-year flood plain. Existing storm drains and flood control channels in the area are designed to accommodate a maximum storm event that would be expected to take place in the project area, so flood flows would not be impeded or redirected.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**i. Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

**Less Than Significant Impact.** The project site is not within an area of the City that is subject to flooding during 100-year and 500-year storm events. Existing storm drains and flood control channels in the project area are designed to accommodate a maximum storm event that

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<sup>4</sup> City of Los Angeles Planning Department, *Los Angeles Citywide General Plan Framework, GIS Maps, March 1994*.

would be expected to occur in the area. There are no levees or dams in the project area. Therefore, the project would not expose people or structures to significant flood-related risks.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**j. Would the project cause inundation by seiche, tsunami, or mudflow?**

**Less Than Significant Impact.** The project site is located approximately 15 miles from the ocean. Therefore the area is not subject to seiche or tsunami hazards. In addition, the site is located on and surrounded by essentially level ground that consists nearly entirely of impervious surfaces, so the potential from mudflow on the site is less than significant.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

**IX. LAND USE AND PLANNING**

**a. Would the project physically divide an established community?**

**Less Than Significant Impact.** The proposed project site is predominantly vacant. The proposed project design features would help to merge the high-rise urban development that is evident north of the project site with the specialized convention and sports venues located south of 11th Street, and continue the existing pattern of major visitor-serving land uses in this portion of the South Park area. The project area is experiencing a period of substantial transition, with no established community present on site.

Conclusion: Although the proposed project would not divide an established community, this issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures will be developed, as appropriate.

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

**Potentially Significant Unless Mitigated.** The project is consistent with the existing City of Los Angeles General Plan (Central City Community Plan) and the Central Business District Redevelopment Plan designation for regional center commerce/parking uses for the property. The Central City Community Plan also designates Convention Center and related uses as appropriate for the project site. The zoning for the project site is General Commercial (C2-4D) and Qualified Multiple Dwelling ([Q]R5-4D). The proposed land uses are permitted under this zoning designation if a conditional use permit is obtained from the City of Los Angeles

Conclusion: While the proposed project appears to be consistent with the General Plan designation and zoning for the site, General Plan policy consistency issues will be discussed in the EIR in conjunction with the discussion of the project's consistency with the Central Business District Redevelopment Plan and the Central City Community Plan. Mitigation measures will be developed, as appropriate.

**c. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?**

**No Impact.** The project site is located in a highly urbanized area. There are no applicable habitat conservation plans or natural community conservation plans in place for the area. Accordingly, no significant impacts would be expected.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

## **X. MINERAL RESOURCES**

**a. Would the project result in the loss or availability of a known mineral resource that would be of value to the region and the residents of the State?**

**No Impact.** The proposed project is not located on a site that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.<sup>5</sup> No significant impacts would, therefore, be expected.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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<sup>5</sup> *City of Los Angeles Planning Department of Planning, General Plan Framework, GIS Maps, February, 1994.*

**b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

**No Impact.** The proposed project is not located on a mineral resource recovery site delineated in the General Plan Framework for the City of Los Angeles.<sup>6</sup> It is unlikely that significant mineral deposits exist on the site. Therefore, no significant impacts would be expected.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

## **XI. NOISE**

**a. Would the project result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Potentially Significant Unless Mitigated.** The proposed project would include uses that could increase noise levels in the area. Additionally, increased traffic could contribute to a higher vehicle-related noise level. These noise levels will be measured and the level of significance of any increased levels will be evaluated.

Conclusion: This issue shall be analyzed and documented in the Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**b. Would the project result in the exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant Impact.** Construction of the proposed project could temporarily cause groundborne vibrations or groundborne noise levels to occur in the project area. However, any such impacts would be temporary and consistent with levels generally associated with construction activity. No impact would occur during operation of the project.

Conclusion: Although the project would not generate excessive groundborne vibration or noise levels, this issue shall be analyzed and documented in an Environmental Impact Report.

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<sup>6</sup> *Ibid.*

- c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Potentially Significant Unless Mitigated.** The proposed uses may cause an increase in ambient noise levels in the project vicinity. The project could also generate additional vehicle trips to and from the project site which would have the potential to increase vehicle-related noise in the vicinity. The project's impact to ambient noise levels in the area will be measured and evaluated in relation to existing levels.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

- d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Potentially Significant Unless Mitigated.** Project construction could temporarily increase ambient noise levels in the site vicinity. In addition, certain events taking place at the project site could generate periodic increases in ambient noise levels. The magnitude of construction and event related noise impacts, including that resulting from increased traffic, will be measured and evaluated.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The project is not located within an airport land use plans or within two miles of a public airport. Accordingly, no significant impacts would be expected.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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

**No Impact.** The project is not located in the vicinity of a private airstrip. Therefore, no significant impacts would be expected.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

## **XII. POPULATION AND HOUSING**

- a. Would the project induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**Potential Significant Unless Mitigated.** The proposed project would include both residential and commercial uses. Some of the residential units would be occupied by existing area residents and persons employed in the area but currently commuting from a distance for employment. In addition, some persons may choose to relocate to the area for other reasons. The proposed project would also provide additional employment opportunities. Some of these employment opportunities would be filled by existing area residents while other persons may relocate to the City of Los Angeles from other communities. In addition to these direct effects, the project has the potential to induce growth in the downtown Los Angeles area by increasing the overall attractiveness of downtown Los Angeles as a destination for visitors as well as future residents. Estimating how many new persons may choose to relocate to the City of Los Angeles is speculative. However, the number of persons and households that could be added to the local population would not be anticipated to be sufficiently large as to exceed local population projections. Therefore, a less than significant impact is expected as a result of the proposed project.

The anticipated growth in the entertainment, retail, service and hotel uses would need to be evaluated against the capacity of existing service and infrastructure systems, this activity would likely provide beneficial impacts to this area of the City. Potential significant impacts related to the new residences and the employment opportunities provided by the commercial uses will be identified and evaluated.

Given the urban setting of the project site and the availability of existing infrastructure and roadways, development of the proposed project would not result in the urbanization of an undeveloped area or the extension of major infrastructure. Implementation of the proposed project would not directly or indirectly result in substantial population growth in the area. Therefore, no impact related to the extension of roads or other infrastructure would result and no mitigation measures would be required.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and potential significant impacts shall be appropriately mitigated.



**b. Would the project displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?**

**No Impact.** The proposed project would not remove and/or displace any businesses or residents from the project site.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

### **XIII. PUBLIC SERVICES**

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

**(1) Fire protection?**

**Potentially Significant Unless Mitigated.** Fire and emergency medical service to the project site would be provided by the City of Los Angeles Fire Department, which requires that access remain clear and unobstructed at all times. Thus, no significant impacts to fire protection services with regard to access would be created by construction or implementation of the proposed project. However, the addition of project patrons, employees, and residents in this area may create the need for additional fire protection and emergency medical services in the area. The anticipated demand will be evaluated in conjunction with the existing services and mitigation measures shall be developed as necessary.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**(2) Police protection?**

**Potentially Significant Unless Mitigated.** Police service to the project site is provided by the Los Angeles Police Department. The addition of project patrons, employees, and residents may create the need for additional police officers or facilities serving the area. Any additional demand created by the implementation of the proposed project will be evaluated in conjunction with existing services.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**(3) Schools?**

**Potentially Significant Unless Mitigated.** The proposed project includes residential uses that could result in an increase in the number of students attending schools in the area.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**(4) Parks?**

**Potentially Significant Unless Mitigated.** The project includes residential uses that may have an impact on local and regional parks or other recreational facilities unless mitigated. The additional residential population within the project may have an indirect impact upon the demand for parks and recreation facilities in the area, but this increase is not expected to result in substantial adverse physical impacts.

Conclusion: The proposed project may have a significant impact on parks and recreational facilities in the area and shall be analyzed and documented in an Environmental Impact Report.

**(5) Other governmental services (including roads)?**

**Potentially Significant Unless Mitigated.** Project operations have the potential to occasionally require special traffic management services. In addition, project operations would utilize and, to some extent, affect the maintenance of public facilities including roads. However, wear and tear on City streets resulting from project traffic is not expected to be excessive or beyond normal requirements. In addition, project development would generate additional property tax revenues, which would contribute to public funding available for facility maintenance. The applicant would be required to implement all roadway improvements, if any are identified in the project traffic analysis, that are required due to implementation of the project.

Conclusion: No further analysis of this issue is recommended and no further mitigation measures would be required.

**XIV. RECREATION**

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

**Less Than Significant Impact.** The project may result in the increased use of existing neighborhood and regional parks or other recreational facilities in the project area. However, the potential increase would not be to such a degree that substantial physical deterioration of the facility would occur or be accelerated.

Conclusion: Although no significant impact to parks or recreational facilities is expected to occur as a result of the proposed project, this issue shall be analyzed and documented in an Environmental Impact Report.

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

**Potentially Significant Unless Mitigated.** The project includes the development of commercial entertainment facilities, an open-air plaza, shopping paseos, and substantial pedestrian-oriented streetscape improvements. Approval of the project would be contingent upon environmental review.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

## **XV. TRANSPORTATION AND CIRCULATION**

- a. Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)?**

**Potentially Significant Impact.** Project operation would generate traffic from employees, patrons, and residents. A traffic study will be conducted to assess the increase to the existing traffic load and capacity of the surrounding streets. Cumulative traffic impacts will also be evaluated.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

- b. Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?**

**Potentially Significant Unless Mitigated.** Implementation of the proposed project would generate traffic from employees, patrons, and residents. A traffic study will be conducted to assess the proposed project's impact to the existing level of service (LOS) for designated roads and highways in the project vicinity. Cumulative traffic impacts to the LOS will also be evaluated.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

- c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

**Less Than Significant Impact.** The proposed project would not generate substantial air traffic. Accordingly, the project would not have an impact on air traffic patterns or levels that would result in substantial safety risk.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

- d. Would the project substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Less than Significant Impact.** The project does not involve any unusual safety design features. The project will utilize existing downtown streets for access. Development of the proposed project would therefore not expose people to significant safety hazards, nor are there incompatible uses in the area that would cause significant safety hazards.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

- e. Would the project result in inadequate emergency access?**

**Potentially Significant Unless Mitigated.** Projected traffic volumes would be evaluated relative to the capacity of existing facilities to assess the adequacy of the existing emergency access routes. The proposed periodic closure of 11<sup>th</sup> Street between Cherry and South Figueroa Streets would result in minor alterations to emergency access routes that currently rely upon 11<sup>th</sup> Street in the vicinity of STAPLES Center and the Convention Center. The proposed realignment of 12<sup>th</sup> Street between South Figueroa and South Flower Streets would result in minor changes to emergency access during construction, but upon completion, would improve westbound emergency access to STAPLES Center and the Convention Center.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**f. Would the project result in inadequate parking capacity?**

**Potentially Significant Unless Mitigated.** The proposed project would generate a demand for parking capacity. The projected parking demand will be evaluated and compared to existing capacity and project capacity for parking spaces, as well as the potential for shared parking with the existing STAPLES Center and Convention Center.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**g. Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?**

**Less Than Significant Impact.** The proposed project would be required to comply with all adopted City ordinances, regulations and policies regarding alternative transportation modes. Therefore, no significant impacts would be expected.

Conclusion: Although the proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation, this issue shall be analyzed and documented in an Environmental Impact Report.

## **XVI. UTILITIES**

**a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**Potentially Significant Unless Mitigated.** Wastewater treatment (sewer) service to the project site is provided by the Los Angeles City Bureau of Sanitation. Based on its current projections through the year 2010, the Bureau expects to be able to meet future needs.<sup>7</sup> This forecast is based in part on a 23 percent growth in the size of the DWP's service population, or approximately one percent growth per year, which is derived from SCAG data.<sup>8</sup> Therefore, no significant impacts would be expected to regional wastewater infrastructure.<sup>9</sup> However, the proposed project may generate additional demand upon local wastewater conveyance systems. The projected wastewater demand will be evaluated and compared to existing capacity and appropriate project design measures provided.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be developed, as appropriate.

**b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Less Than Significant Impact.** Local wastewater treatment facilities are operated by the City of Los Angeles Bureau of Sanitation. Wastewater generated by the project would flow to the Hyperion Treatment Plant, which completed a major upgrade and renovation of its facilities in 1998 that expanded the capacity of the plant to 450 million gallons per day for both primary and secondary treatment. While adequate capacity at the Hyperion Treatment Plant is anticipated to be available, the sewer lines between the project site and the Hyperion Treatment Plant, particularly those adjoining the project site, may need to be upgraded to handle the sewage flows generated by the project. Improvements to the water system may also be required if insufficient capacity to serve the proposed project exists.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate.

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

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<sup>7</sup> Telephone communication with Anmin Liu, Engineering Manager, Hyperion Treatment Plant, September 23, 1996.

<sup>8</sup> City of Los Angeles Department of Water and Power, Urban Water Management Plan for the City of Los Angeles, November 1995.

<sup>9</sup> *Water, Sewer, and Storm Drain Infrastructure Report*, Psomas and Associates, December 6, 1996.

**Potentially Significant Unless Mitigated.** Almost the entire project site is currently covered with impervious surfaces such as buildings and pavement. During storm events, the project site discharges directly into the City of Los Angeles' storm drain system. Although existing storm drainage infrastructure may be adequate to handle flows from the project site, the project may alter storm water flows in the area, thereby requiring localized improvements to storm water conveyance infrastructure.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and potential significant impacts shall be appropriately mitigated.

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

**Less Than Significant Impact.** The DWP is responsible for supplying water to all properties in the City of Los Angeles, including the project site. Based on the DWP's water consumption projections (which take into account future development) relative to its existing water entitlements, it is expected that there will be an adequate water supply through 2015.<sup>10, 11</sup> Therefore, although project implementation would increase on-site demand for water to support both the project components and landscaped areas, this increase in demand would not be expected to significantly impact regional water supplies.

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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

**Less Than Significant Impact.** As discussed in Response XVI.b, above, the regional wastewater treatment facilities that would serve the project have recently been expanded. Adequate capacity exists and no significant impacts would be expected.

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<sup>10</sup> *Ibid.*

<sup>11</sup> *DWP water projections for 2015 based on an anticipated service population of 4.4 million (23% growth) and 18% water conservation. Source: City of Los Angeles Department of Water and Power, Urban Water Management Plan for the City of Los Angeles, November 1995.*

Conclusion: No further analysis of this issue is recommended and no mitigation measures would be required.

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

**Less Than Significant Impact.** Construction and operation of the proposed project would increase solid waste generation from the project site. Although existing regional solid waste landfills have a large amount of available capacity, the proposed project may result in an adverse effect upon the existing solid waste disposal capacity of regional landfills.

Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report and mitigation measures shall be recommended, as appropriate.

**g. Would the project comply with federal, State, and local statutes and regulations related to solid waste?**

**Potentially Significant Unless Mitigated.** All federal, State, and local statutes and regulations will be adhered to and incorporated into the project.

Conclusion: Further discussion and analysis of this issue will be incorporated into an Environmental Impact Report and appropriate mitigation measures will be suggested to reduce solid waste originating from the construction and operation of proposed project.

## **XVII. MANDATORY FINDINGS OF SIGNIFICANCE**

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

**Potentially Significant Impact.** The proposed project has the potential to degrade the quality of the environment, but would not impact fish or wildlife species or their habitat, nor would it impact any plant communities.



Conclusion: This issue shall be analyzed and documented in an Environmental Impact Report. Mitigation measures shall be developed, as appropriate.

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

**Potentially Significant Unless Mitigated.** The proposed project is located in an area that has been experiencing major transition. Aside from the STAPLES Center and Convention Center which already exist within the vicinity of the proposed project, there are a variety of other projects that could reasonably be expected to be developed in the area in the future. Project impacts that may be individually limited but cumulatively considerable include motor vehicle traffic, air emissions, noise, an increased need for public services such as fire and police protection, and an increased need for storm drain infrastructure. The analysis of potentially significant project impacts shall include an evaluation of the combined effect of the proposed project, past projects, and reasonably foreseeable future projects in the vicinity.

Conclusion: These issue shall be analyzed and documented in an Environmental Impact Report. Mitigation measures shall be developed, as appropriate. However, although mitigation of cumulative impacts, beyond those due to the project itself, will be addressed, such mitigation is beyond the responsibility of the project alone.

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

**Potentially Significant Unless Mitigated.** Construction and operation of the proposed project could generate additional motor vehicle traffic, air emissions, and noise. Such significant impacts could directly or indirectly cause adverse effects on human beings.

Conclusion: These issues shall be analyzed and documented in an Environmental Impact Report. Mitigation measures shall be developed, as appropriate.