VI. SUSTAINABLE COMMUNITIES ENVIRONMENTAL ANALYSIS

INTRODUCTION

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387), as amended in 2019. The analytical methodology and thresholds of significance are generally based on the *L.A. CEQA Thresholds Guide,* unless otherwise noted.

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports (refer to Section 4 [2016-2040 RTP/SCS Program EIR Mitigation Measures]). The following analysis discusses the following topics:

- Aesthetics
- Agriculture
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal and Cultural Resources
- Utilities and Service Systems
- Wildfire
- Energy Conservation
- Mandatory Findings of Significance

ENVIRONMENTAL ANALYSIS

1. AESTHETICS

Senate Bill 743

In 2013, the State of California enacted Senate Bill 743 (SB 743). Among other things, SB 743 adds Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal

Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact threshold in the *L.A. CEQA Thresholds Guide*.

The Proposed Project is a mixed-use infill development with 700 residential units and 15,000 square feet of commercial uses. SB 743 defines an infill site as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. The Project Site meets this definition. The Project Site is served by two nearby Metro Stations within one-half mile of the Project Site: the Pico Station, located approximately 0.4 mile west of the Project Site; and the 7th Street/Metro Center Station, located approximately 0.5 mile northwest of the Project Site. Both stations provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods and are identified as located within a transit priority area. As discussed in Section II, Project Description, the Project Site is designated as a "Transit Priority Area" per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA[1]

Accordingly, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. The aesthetics analysis below is provided for informational purposes only. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	❑	❑	☒	❑
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway?	❑	❑	☒	❑
c. In non-urban areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project	❑	❑	☒	❑

[1] *Zoning Information No. 2452 Transit Priority Areas (TPAs)/exemptions to aesthetics and parking within TPAs pursuant to CEQA (ZI-2452), http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf, accessed, January 2019 (See Appendix N).*

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	conflict with applicable zoning and other regulations governing scenic quality?				
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	❑	❑	☒	❑

PROJECT-SPECIFIC IMPACTS

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

Less Than Significant Impact. As stated above, Senate Bill (SB) 743 was signed into law by Governor Brown in September 2013, which made several changes to CEQA for projects located in areas served by transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered to have a significant impact on the environment.

SB 743 defines a transit priority area as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the A.M. and P.M. peak commute periods. An infill site refers to a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. However, the exemption for aesthetic impacts does not include impacts to historic or cultural resources, per Section 21099 of the Public Resources Code (PRC).

The Proposed Project is a mixed-use infill development with 700 residential dwelling units and 15,000 square feet of retail/restaurant space. The Project Site is served by two nearby Metro Stations within one-half mile of the Project Site. The Pico/Flower Station is located approximately 0.4 miles west of the Project Site and the 7th Street/Metro Center Station is located approximately 0.5 miles northwest of the Project Site, both with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods and are identified as located within a transit priority area. Furthermore, the Project Site does not contain any historic or cultural resources, as discussed in Section 5, Cultural Resources of this Initial Study/SCEA. As such, the proposed project meets all criteria specified in Section 21099 of the PRC. Therefore, the project's impact on visual resources, aesthetic character, shade and shadow, light and glare, scenic vistas, State Scenic Highways, and parking are considered less than significant per SB 743.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway?

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above.

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

Less Than Significant Impact. Refer to Response to Checklist Question 1 (a) above.

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

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above.

CUMULATIVE IMPACTS

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above. The application of Public Resources Code Section 21099 provides that the aesthetic impacts of a mixed-use project, such as the Proposed Project, upon an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, cumulative aesthetic impacts would be less than significant. Under SB 743 and ZI No. 2542, aesthetic impacts of the Proposed Project shall not be considered a significant impact on the environment.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	❑	❑	❑	☒

b.	Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	❑	❑	❑	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	❑	❑	❑	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	❑	❑	❑	☒
e.	Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	❑	❑	❑	☒

PROJECT-SPECIFIC IMPACTS

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

No Impact. An impact would occur if the Proposed Project would convert valued farmland to non-agricultural uses. The Project Site is located in a highly developed area of Downtown Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the "Los Angeles County Important Farmland 2014" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[2] Therefore, no impact to agricultural lands would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC). The Project Site is currently zoned [Q]R5-4D-O with a General Plan land use designation of High Density Residential and is not zoned for agricultural production, and no farmland activities exist on-site. In addition, no Williamson Act Contracts are in effect for the Project Site.[3] Therefore, no impact would occur.

[2] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2014, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf, accessed March 2017.*

[3] State of *California Department of Conservation, Los Angeles County Williamson Act FY 2015-2016, website*: *http://www.conservation.ca.gov/dlrp/lca, accessed March 2017.*

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

No Impact. The Project Site is zoned [Q]R5-4D-O, which has a land use designation of High Density Residential in the Central City Community Plan Area. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site is zoned [Q]R5-4D-O, which has a land use designation of High Density Residential in the Central City Community Plan Area. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

e) 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 or conversion of forest land to non-forest use?

No Impact. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any "Farmland" category designated by the State of California. According to the "Los Angeles County Important Farmland 2014" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site is not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[4] Therefore, no impact would occur.

CUMULATIVE IMPACTS

No Impact. Development of the Proposed Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2014 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.[5] The Project Site is located in an urbanized area in the Central City Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2014, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf, accessed March 2017.*

[5] *Ibid.*

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	❑	❑	☒	❑
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	❑	❑	☒	❑
c. Expose sensitive receptors to substantial pollutant concentrations?	❑	❑	☒	❑
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	❑	❑	☒	❑

Regulatory Compliance Measures - Air Pollution

The following Regulatory Compliance Measures are required in conjunction with the Proposed Project.

- Site Clearing, Grading and Construction Activities: Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
  - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
  - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
  - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
  - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
  - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
  - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
  - Trucks having no current hauling activity shall not idle but be turned off.
- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.
- The Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.
- The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.
- New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.

PROJECT-SPECIFIC IMPACTS

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact could occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 ("2016 AQMP"). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy. In addition, the Southern California Association of Governments (SCAG) recently approved their 2016 RTP/SCS that include transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and the State Implementation Plan (SIP) for the South Coast Air Basin, are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

As discussed in Section 13(a), the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2016 RTP/SCS to increase housing density within close proximity to High-Quality Transit Areas (HQTA). An HQTA is

defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Proposed Project would concentrate new development and jobs within a half of a mile (walking distance) of several Metro bus lines that connect to all regions of the Los Angeles area. Additionally, the Project Site is served by two nearby Metro Stations within one-half mile of the Project Site: the 7th Street/Metro Center Station is located approximately 0.5 miles northwest of the Project Site and the Pico/Flower Station is located approximately 0.4 miles west of the Project Site. Thus, the Project's location provides opportunities for employees, guests, and visitors to use public transit to reduce vehicle trips. The Project Site is also located in a Transit Priority Area as defined by CEQA Sections 21099 and 21064.3. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. The Proposed Project's mixed-use nature and close proximity to neighborhood-serving restaurant/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the 2016 RTP/SCS (as discussed in greater detail in response to Checklist Question 7(a), Greenhouse Gas Emissions), the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.

A project would conflict with the applicable AQMP is the project were to exceed the adopted thresholds of significance as adopted by the SCAQMD. The following analysis discusses and quantifies the Project's construction and operational air quality emissions and addresses the project's consistency with the SCAQMD's construction and operational thresholds of significance.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 30 months with buildout anticipated in 2022. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in five main steps: (1) site clearing; (2) grading/excavation; (3) building construction; (4) architectural coatings; and (5) paving. The entire construction phase includes the demolition/site clearing of the surface parking lot, construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG/VOC emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

As required by CEQA, the Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) as recommended by the SCAQMD. Table VI-1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to

occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required and regulated by SCAQMD.

Table VI-1
Estimated Peak Daily Construction Emissions

Emission Source	Emissions in Pounds per Day					
	ROG	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Site Clearing						
On-Site Fugitive Dust	--	--	--	--	2.62	1.33
On-Site Off-Road (Diesel Equipment)	2.33	24.66	11.80	0.02	1.22	1.14
Off Site (Hauling, Vendor, Worker)	0.36	11.31	2.57	0.03	0.77	0.24
Total Emissions	***2.69***	***35.97***	***14.37***	***0.05***	***4.61***	***2.71***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Grading/Excavation						
On-Site Fugitive Dust	--	--	--	--	2.96	1.52
On-Site Off-Road (Diesel Equipment)	2.38	27.50	13.22	0.03	1.22	1.12
Off Site (Hauling, Vendor, Worker)	2.14	71.56	14.83	0.19	11.62	3.18
Total Emissions	***4.52***	***99.06***	***28.05***	***0.22***	***15.80***	***5.82***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Building Construction						
On-Site Off-Road Diesel Equipment	3.41	25.71	23.29	0.04	1.49	1.45
Off Site (Hauling, Vendor, Worker)	4.08	14.02	31.05	0.10	8.49	2.36
Total Emissions	***7.49***	***39.73***	***54.34***	***0.14***	***9.98***	***33.81***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Architectural Coating						
On-Site Architectural Coating	44.61	--	--	--	--	--
On-Site Off-Road Diesel Equipment	1.39	10.36	11.43	0.02	0.67	0.66
Off-Site Hauling/Vendor/Worker Trips	0.85	5.70	6.47	0.03	1.90	0.54
Total Emissions	***46.85***	***16.06***	***17.90***	***0.05***	***2.57***	***1.20***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Paving						
On-Site Off-Road (Diesel Equipment)	0.77	7.74	8.86	0.01	0.42	0.38
Off Site (Hauling, Vendor, Worker)	0.13	2.42	1.07	<0.01	0.31	0.09
Total Emissions	***0.90***	***10.16***	***9.93***	***0.01***	***0.73***	***0.47***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. Calculation sheets are provided in Appendix A to this SCEA.
Parker Environmental Consultants, 2017.

As shown in Table VI-1, construction-related daily emissions associated with the Proposed Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant.

Operational Emissions

The existing Project Site currently consists of a surface parking lot that accommodates existing parking demand in the vicinity. Therefore, this analysis assumes there are no existing air quality emissions from the Project Site as the vehicle parking at the Project Site are originating from other land uses in the area.

The Proposed Project would result in the site clearing of the existing surface parking lot and the development and operation of a high-rise mixed-use building with 700 residential dwelling units and approximately 15,000 square feet of ground floor commercial space. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.2*) recommended by the SCAQMD. The analysis of operational air quality impacts was based on the net external vehicle trips identified in the Project Traffic Study (3,392 average daily trips), which included trip credits for internal capture, transit, and pass-by trip reductions. The modeling inputs included default diverted trips and pass-by trips in the trip characteristics calculation in which CalEEMod, internally calculates trip length reductions associated with each type of trip. To provide a more conservative estimate of the Project's vehicle miles travelled, the air quality model input was adjusted to remove the diverted and pass-by trip characteristics and assign 100 percent of the Project's estimated trips as primary trips, with no trip length reductions for diverted or pass-by trips.[6] The results of these calculations are presented in Table VI-2, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project adds a considerable cumulative contribution to federal or state non-attainment pollutants. As the Basin is currently in State non-attainment for ozone, PM_{10} and $PM_{2.5}$, related projects could exceed an air

[6] *It should be noted that this approach is overly conservative in assigning 100 percent of the net driveway trips as "primary trips" as the CalEEMod default trip characteristics for primary, diverted, and pass-by trips is based on regional trip length data provided by each air district and is well supported.*

quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the Project incremental contribution to cumulative air quality emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed under Question 3(b) above, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.

Table VI-2
Proposed Project Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area	17.47	12.28	62.87	0.08	1.26	1.26
Energy	0.25	2.13	1.11	0.01	0.17	0.17
Mobile Sources	6.23	32.30	86.83	0.33	27.73	7.59
NET Project Emissions	**23.95**	**46.71**	**150.81**	**0.42**	**29.16**	**9.02**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Area	17.47	12.28	62.87	0.08	1.26	1.26
Energy	0.25	2.13	1.11	0.01	0.17	0.17
Mobile Sources	5.92	33.00	80.74	0.32	27.73	7.59
NET Project Emissions	**23.64**	**47.41**	**151.32**	**0.41**	**29.16**	**9.02**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculation worksheets are provided in Appendix A to this SCEA.
Source: Parker Environmental Consultants 2018.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health

care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[7]

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[8] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 − Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 source receptor areas (SRA) at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project include the surrounding multi-family residences. Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 25 meters (82.02 feet) are used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase. Sensitive receptors located further than 25 meters would be less impacted by localized emissions.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table VI-3, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate 1-acre site in SRA 1. These calculations reflect compliance with appropriate dust control measures as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining

[7] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*
[8] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

Table VI-3
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Site Clearing	24.66	11.80	3.84	2.47
Grading/Excavation	27.50	13.22	4.18	2.64
Building Construction	25.71	23.29	1.49	1.45
Architectural Coatings	10.36	11.43	0.67	0.66
Paving	7.74	8.86	0.42	0.38
SCAQMD Localized Thresholds [c]	**74**	**680**	**5**	**3**
Potentially Significant Impact?	*No*	*No*	*No*	*No*

- *The localized thresholds for all phases are based on a receptor within a distance of 82 feet (25 meters) in SCAQMD's SRA 1 for a Project Site of 1 acre.*
- *The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*

Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.

effective cover over exposed areas. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Localized Operational Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The South Coast Air Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). The Basin has been in attainment for CO since 2007, and CO levels in the Source Receptor Area (SRA) 1 remain substantially below the federal and state standards. The maximum CO levels during 2016 were recorded at 1.9 ppm (one-hour average) and 1.4 ppm (eight-hour average), compared to the thresholds of 20 ppm (one-hour average) and 9.0 (eight-hour average).[9] In its 2003 AQMP, the SCAQMD conducted CO hot-spot analyses at the four worst-case intersections in the Air Basin. The SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. The data provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at all four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing [2003] background CO concentrations, the worst-case CO levels in the Basin was estimated to be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average), respectively, which is below the CO thresholds of significance for both the CAAQS and NAAQS. The

[9] *The most recent annual ambient air quality data is for the year 2016, http://www.aqmd.gov/docs/default-source/air-quality/historical-data-by-year/2016-air-quality-data-tables.pdf?sfvrsn=14*

AQMP therefore concluded that because the Basin is in attainment for CO, and the studied congested intersections do not exceed state thresholds, CO hotspots are less than significant under extreme conditions. Comparatively, recent ambient CO levels in 2016 are substantially lower than they were in 2013 and the volume of traffic at the intersection of Grand Avenue and Olympic Boulevard is substantially lower than the studied intersections in the 2003 AQMP study.[10] Therefore, it is reasonable to conclude that the Proposed Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Therefore, no further analysis for CO hotspots is warranted and localized operational emissions would be less than significant.

Toxic Air Contaminants (TAC)

Construction Emissions

The Proposed Project's construction activities would generate toxic air contaminants in the form of diesel particulate emissions associated with the use of heavy trucks and construction equipment. The SCAQMD CEQA Air Quality Handbook does not recommend analysis of TACs from short-term construction activities associated with land use development projects. The rationale for not requiring a health risk assessment for construction activities is the limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of toxic air contaminants (TACs) over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Because the construction schedule for the Project estimates that the phases which require the most heavy-duty diesel vehicle usage, such as site grading/excavation, would last for a much shorter duration (e.g., approximately six months) and the overall construction schedule would be limited to approximately 30 months (2.5 years), construction of the Project would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (30 out of 840 months of a 70-year lifetime), further evaluation of construction TAC emissions is not warranted. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. The Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location.

Although a construction HRA is not required per the Thresholds Guide nor by the SCAQMD, for informational purposes only, an HRA has been prepared by Eyestone Environmental in accordance with current SCAQMD Guidance to provide the City with additional supporting evidence that health risk impacts from Project construction would be less than significant. The HRA is provided as Appendix L to this SCEA.

[10] *Based on the peak hour data provided in Appendix H to this SCEA, the ADT at the Olympic Boulevard and Grand Avenue intersection is estimated to be approximately 35,000 as compared to 100,000 ADT at the four study intersections in the 2003 AQMP.*

It provides an estimate of the potential risks and hazards to individuals through inhalation of Project construction diesel particulate matter (DPM) emissions over a 30-month duration. The estimated risks and hazards include: lifetime excess cancer risk estimates, and cumulative chronic HI estimates for the receptor locations of concern. As shown in Appendix L, the results of the HRA yields a maximum off-site individual cancer risk of 4.3 in a million at the residences located north-east of the Project site. The maximum chronic risk of 0.057 occurs within this same residential area. As the Project would not emit carcinogenic or toxic air contaminants that result in impacts which exceed the maximum individual cancer risk of ten in one million or the chronic index of 1.0, Project-related toxic emission impacts would be less than significant. Therefore, the Proposed Project would result in a less than significant impact related to construction TACs.

Operational Emissions

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Proposed Project consists of a mixed-use development containing multi-family residential and retail/commercial uses that would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such, no significant toxic airborne emissions would result from Proposed Project implementation**.** The SCAQMD published and adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). The SCAQMD recommends that HRAs be conducted for substantial sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units). None of these situations apply to the Proposed Project.

The Project proposes to construct a total of 700 residential dwelling units, 7,000 square feet of retail space, 8,000 square feet of restaurant space, and 1,075 parking spaces. A conservative estimate of the number of daily/annual truck trips is provided below.

- It is conservatively assumed that each residential unit would require one move in/move out per year and would require a heavy-duty diesel truck (1.400 trucks per year). (It is anticipated that move in/move outs would be less per year and many would not require heavy-duty diesel trucks.) In addition, it is conservatively assumed that each residential unit would receive on average one package per week from a heavy-duty diesel truck. This would be equivalent to approximately five deliveries (e.g., UPS or FedEx) per day since a single truck would delivery multiple packages at the Project Site during each visit (1,825 trucks per year). Approximately four trash trucks would be required per week (208 trucks per year). Using these conservative assumptions, the total trucks related to the proposed residential uses would equal 3,433 per year or nine per day. Please note that this conservatively assumes that all trucks would be diesel.

- It is conservatively estimated that the 15,000 square feet of retail/restaurant space would generate a maximum of five deliveries per day and require two trash trucks per week. This is equivalent to

1,929 trucks per year or just over five trucks per day. Once again, this conservatively assumes that all trucks would be diesel.

As shown above, the Project is conservatively estimated to generate approximately 14 trucks per day. Based on the SCAQMD guidance, there was no quantitative analysis required for future cancer risk within the Project Area as the Project is consistent with the recommendations regarding the siting of new sensitive land uses near potential sources of TAC emissions provided in the SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. Specifically, the Project is not considered to be a substantial source of diesel particulate matter warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Therefore, operational impacts associated with the release of toxic air contaminants would be less than significant.

d) Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Garbage collection areas for the Project Site would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. Further, the Proposed Project would be required to install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138 to control odors from any operational activities within the proposed commercial uses. With compliance with SCAQMD Rules 402 and 1138, described above, potential objectionable odor impacts would be less than significant.

During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors could be a temporary source of nuisance to adjacent uses. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, no construction activities or materials that would create a significant level of objectionable odors are proposed. Therefore, impacts associated with objectionable odors would be less than significant.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in the already urbanized area of the City of Los Angeles.

AQMP Consistency

Cumulative development can affect implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2016 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant.

Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in Question 3(c) above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

Odor Impacts

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1108 and 1113 limits the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and Rule 1138 (Odor Reducing Equipment) would regulate any objectionable odor impacts from the related projects and the Proposed Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	❑	☒	❑	❑
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, and regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	❑	❑	❑	☒
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	❑	❑	❑	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	❑	❑	❑	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g. oak trees or California walnut woodlands)?	❑	❑	☒	❑
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	❑	❑	❑	☒

Mitigation Measures Incorporated from, or Consistent with, Mitigation Measures in the RTP/SCS EIR:

MM-BIO-1 Habitat Modification (Nesting Native Birds):

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

PROJECT-SPECIFIC IMPACTS

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

Less Than Significant with Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in a highly urbanized area in the City of Los Angeles and is improved a paved surface parking lot. The Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Vegetation on the Project Site is limited to five street trees (Canary Island pine) in the public right-of-way along Hill Street and two street trees (Southern Magnolia) in the public right-of-way along Olympic Boulevard. It is anticipated that all of these trees would be removed. The removal and placement of street trees would be subject to the review and approval of the Board of Public

Works, Urban Forestry Division. None of these trees in the public right-of-way are designated protected trees.[11] Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. Therefore, the Proposed Project would have a less than significant impact upon removal of non-protected trees.

With respect to the proposed removal of non-protected trees currently along the public right-of-way, the removal of trees has the potential to impact nesting bird species if they are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20*) and Section 3503 of the California Department of Fish and Game Code. To ensure compliance with the MBTA, the City of Los Angeles Department of City Planning advises applicants to avoid tree removal activities during the breeding season. If avoidance is not feasible, the Department recommends weekly bird surveys be conducted to ensure that the trees proposed for removal are not occupied by nesting birds. Thus, with implementation of Mitigation Measure BIO-1, listed above, the Proposed Project would have a less than significant impact on sensitive biological species or habitat.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is occupied by a paved surface parking lot. The Project Site is an infill lot located in a developed neighborhood within the City of Los Angeles. No riparian or other sensitive natural vegetation communities are located on or adjacent to the Project Site. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and no impact would occur.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The Project Site is entirely developed with impermeable surfaces and does not contain any wetlands or natural drainage channels. Further, the Project Site is located in a developed area within the

[11] *Wayne Romanek, California Registered Landscape Architect, Carter, Romanek Landscape Architects, Inc., April 27,2017.*

City of Los Angeles. The Project Site nor the surrounding area contain any wetlands or riparian habitat. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Question 4(b), above). No impacts to riparian or wetland habitats would occur with implementation of the Proposed Project.

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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally result in a significant impact on biological resources if it results in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in a heavily urbanized area of Downtown Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites on the Project Site or in the Project Site vicinity. Thus, the Proposed Project would not interfere with the movement of any residents or migratory fish or wildlife. Therefore, no impact would occur.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. As stated above, the Project Site is improved with a surface parking lot. There are no protected tree species located on the Project Site. Therefore, the Proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. However, all street trees in the public right-of-way are expected to be removed as a result of the Proposed Project. All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal shall be replaced at a 2:1 ratio with a minimum 24-inch box tree. Further, the Proposed Project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits take of all birds and their active nests including raptors and other migratory non-game birds. Thus, any impacts upon the loss of on-site trees would be less than significant levels.

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. A significant impact would occur if the Proposed Project would be inconsistent with maps or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project.

CUMULATIVE IMPACTS

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with regulatory compliance and mitigation measures. Development of the Proposed Project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. Thus, cumulative impacts to biological resources would be considered less than significant.

V. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?	❑	❑	☒	❑
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to *State CEQA Guidelines* §15064.5?	❑	❑	☒	❑
c. Disturb any human remains, including those interred outside of formal cemeteries (see Public Resources Cod, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))?	❑	❑	☒	❑

This section is based on the following report: Olympic + Hill Development, Los Angeles, California, Historical Resource Technical Report, prepared by GPA Consulting, dated May 2017.

Regulatory Compliance Measures:

The following Regulatory Compliance Measures are required in conjunction with the Proposed Project.

- **Cultural Resources (Archaeological):** If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

- **Cultural Resources (Paleontological):** Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and:
  - The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
  - The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
  - The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
  - Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

- **Cultural Resources (Human Remains):** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
  - Stop immediately and contact the County Coroner:
    1104 N. Mission Road
    Los Angeles, CA 90033
    323-343-0512
    (8 a.m. to 5 p.m. Monday through Friday) or
    323-343-0714
    (After Hours, Saturday, Sunday, and Holidays)
  - If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
  - The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
  - The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
  - If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

PROJECT-SPECIFIC IMPACTS

a) Would the project cause a substantial adverse change in the significance of an historic resource pursuant to §15064.5?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Proposed Project results in a substantial adverse change in the

significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[12]

According to available historical sources, the Project Site was formerly developed with residential structures from at least 1888 to 1906. A single structure is depicted to replace the residential structures in 1920. From 1950-1963, a commercial structure with restaurant, stores, and a parking structure occupy the Project Site. Since 1972 through the present, the Project Site has remained with asphalt paved surface parking.[13] As previously stated, the Project Site is currently developed with a paved surface parking lot. As such, no buildings, structures, or other property types that could be considered eligible for listed in the National Register of Historic Places, California Register of Historical Resources, or as a Los Angeles Historic-Cultural Monument occur on-site. Therefore, there are no known or potential historic resources on the Project Site.

GPA Consulting ("GPA") conducted the Historical Resource Report to identify historical resources in the vicinity of the Project Site, to assess any potential impacts the Proposed Project may have on the identified historical resources. Two buildings are included in the study area: 1) Mayan Theater, located at 1036-1038 S. Hill Street, immediately south of the Project Site; and 2) Western Pacific Building, located at 1023-1039 S. Broadway, immediately east of the Project Site. The Proposed Project would be within the same block as these two historical resources.

Mayan Theater

The Mayan Theater is located on S. Hill Street, immediately south of the Project Site. It was designated as HCM #460 in 1989 and was identified as eligible for listing in the National Register in the Central Business District Historic Resources Survey in 1983. At that time, the California Register was not yet established, so the survey form did not address California Register eligibility. However, it is understood that properties eligible for listing in the National Register are eligible for listing in the California Register as the criteria are essentially the same. The property was not included in SurveyLA, the Citywide historic resource survey, as it is a designated HCM. SurveyLA did not re-evaluate properties that are listed under national, state, or local landmark programs. The property is significant in the context of architecture as an excellent example of the Exotic Revival style as well as an important work by Morgan, Walls & Clements and Francisco

[12] *CEQA Guidelines, Section 15064.5(b)(1).*

[13] *Advantage Environmental Consultants, LLC, Phase I Environmental Site Assessment, W Olympic Boulevard and S Hill Street Property, Los Angeles, California 90015, April 15, 2017.*

Cornejo. Morgan, Walls & Clements are widely recognized as master architects for the quality and influence of their work. It is understood that Stiles Clements was responsible for the design of the Mayan Theater. Cornejo is not well known in the United States, but also considered a master. He was a Mexican painter, sculptor, and educator who specialized in Mayan and Aztec themes. He exhibited his studio work in galleries from Mexico City to San Francisco. In 1926, he curated an exhibition of ancient American art and its modern applications. The Mayan Theater is his most important work in Los Angeles.

The building was constructed in 1927 as a live performance theater. The opening show was "Oh Kay," a musical comedy by George Gershwin. Although the production was a hit, the architecture received mixed reviews. While some found it "grotesque," others thought it to be a welcome departure from the ubiquitous Classical and Renaissance styles of the era. The design for the theater was not based on an existing Maya structure. Instead, Morgan, Walls & Clements designed the theater to meet contemporary specifications, then divided it into "modules," to which Cornejo applied Maya ornamentation.

The board-formed concrete structure is rectangular in plan and is composed of three distinct portions that vary in height. The front portion is covered by a side-facing gabled roof and contains the theater lobby on the ground floor and offices on the second floor. The middle portion is approximately the same height as the front portion, but is covered by a flat roof. Within the middle portion is the auditorium. The rear portion is comparable to seven stories in height and contains the stage, dressing rooms, and fly space. The Hill Street facade is extremely ornate, featuring extensive Maya decorative motifs, including serpents, figures, and geometric designs. The north and east elevations are utilitarian in design with only a few window openings for the offices. The south elevation abuts the Belasco Theater.

The two theaters were owned by the oil magnate Edward L. Doheny and a partner, retired investor Nathan W. Stowell. The Mayan and the Belasco were an attempt to get a new fashionable legit theater district going west of Broadway. The Mayan was managed by the same team that ran the Belasco, Gerhold Davis and Edward Belasco. Beginning in 1929, the theater presented motion pictures as well as plays and musicals. From 1936 until at least 1939, the Mayan was used by the Works Progress Administration's federal theater project. Duke Ellington's "Jump for Joy" opened in July of 1941 with an all-black cast including Dorothy Dandridge and Ivie Anderson. The show ran until September. Plans for a national tour leading to Broadway were dropped after Japan bombed Pearl Harbor and many cast members were drafted. The Mayan began showing Spanish language films in 1949, and pornographic films in 1969. The theater was turned into a dance and music club in 1989.

Western Pacific Building

The Western Pacific Building is located on S. Broadway east of the Project Site, but physically separated by an alley called Blackstone Court. It was identified as eligible for listing in the National Register in the Central Business District Historic Resources Survey in 1983. The property was re-surveyed by SurveyLA and identified as eligible for listing in the National and California Register and for designation as an HCM. The property is significant in the context of architecture as an excellent example of Beaux Arts Classicism, as well as an important work by the master architects Walker & Eisen.

The building was initially developed in 1925 by the Los Angeles Investment Company. The company was founded around 1896 and got its start producing hundreds of bungalows a year through company-owned lumber mills, warehouses, and hardware stores. Its reputation for quality long-lasting construction helped it grow to the largest cooperative building company in America by the early 1900s. As early as 1911, the company branched out into commercial and office building construction. The Western Pacific Building was developed as office space and leasing demand was so high that an addition was underway less than a year after the original portion was completed. Any differences in the two phases of construction, the northeast half in 1926 and the southwest half in 1927 are imperceptible from the exterior. Research in contemporary newspapers did not reveal the reasoning behind the building's name, but it was commonly called the "Western Pacific Building" from its inception. The architectural firm of Walker & Eisen designed the original building as well as the addition, with the Los Angeles Investment Company acting as the contractor.

The Beaux Arts style building has a tapered rectangular footprint. There are two light wells, one each at the north and south ends of the building, forming an H-shape on the upper levels. Twelve-stories in height, the building has a concrete foundation and a reinforced concrete structure. The Broadway facade is clad in terra cotta and red brick is organized horizontally into three sections. The side and rear elevations are clad in stucco and are much simpler than the façade. One-over-one double-hung sash metal windows are stacked vertically across each elevation, which are without ornamentation.

Determining the Significance of Impacts on Historical Resources

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

> A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies "substantial adverse change" as follows:

> Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Title 14 California Code of Regulations Section 15064.5(b)(1) in turn explains that a historical resource is "materially impaired" when a project:

> Demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on a historical resource if it would result in a substantial adverse change in the significance of the historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

As such, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not the Proposed Project will alter in an adverse manner the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs such as the list of HCMs.

Analysis of Project Impacts

The Proposed Project would have no direct impacts on historical resources. There are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, relocated, or altered as a result of the Proposed Project. Therefore, this report only analyzes the indirect impacts the Proposed Project may have on the historical resources in the vicinity.

The Mayan Theater is immediately south of the Project Site, and the Western Pacific Building is immediately southeast but separated by an alley. However, as more fully described below, the new building would not affect the physical integrity or historic significance of these historical resources. As such, the Proposed Project would have no indirect impacts on the historical resources in the vicinity.

In determining indirect impacts of adjacent new construction on individual resources such as the Mayan Theater and Western Pacific Building, the central question is whether the new building would affect the physical integrity of the historic building to the degree that it would no longer qualify as a historical resource. Such an effect would only occur if the Mayan Theater or Western Pacific Building no longer retained sufficient integrity to convey its significance. According to *National Register Bulletin #15*, there are seven aspects of integrity: feeling; association; workmanship; location; design; setting; and materials. The only relevant aspect with respect to the impact of a new building on a historic building is setting. Setting refers to the character of the place in which the property played its historical role.

The *Los Angeles Citywide Historic Context Statement* prepared by the Office of Historic Resources is organized into nine broad contexts, and establishes eligibility standards for associated property types. The Mayan Theater is eligible in the Architecture and Engineering Context under the Mayan Revival Subtheme. For buildings to be eligible under this context and subtheme, they should retain integrity of design, materials, workmanship, and feeling. It is also eligible in the Entertainment Industry Context under the Movie Theater Subtheme. For buildings to be eligible under this context and subtheme, they should retain

integrity of location, feeling, and association. The Western Pacific Building is eligible in the Architecture and Engineering Context under the Beaux Arts Classicism Subtheme. For buildings to be eligible under this context and subtheme, they should retain integrity of location, design, materials, workmanship, and feeling. So in the case of both buildings, setting is not an essential factor of integrity. As both buildings occupy their entire parcels, they have no immediate setting, only a broad setting.

Historically, Hill Street south of Olympic Boulevard was developed with low to mid-rise commercial buildings, but by the 1970s many had been demolished. Those parcels have remained undeveloped or minimally developed with surface parking lots until recently. Although the Proposed Project would introduce a new visual element to the area, the Mayan Theater would retain its integrity of setting. The most important aspect of the broad setting of the Mayan Theater is its relationship with the Belasco Theater on the south. That relationship would not be altered by the construction of a new building north of the Mayan Theater. Furthermore, the portion of the new building adjacent to the Mayan Theater is only nine stories in height, which is not out of scale with Mayan Theater, which ranges in height from two stories at the front and seven stories at the rear. The tower portion of the new building would be situated at the corner of S. Hill Street and Olympic Boulevard away from the historic building.

Although it is only one block east, Broadway south of Olympic Boulevard was historically developed with taller commercial buildings that rose to 12 stories in height. These included the still extant Western Pacific Building as well as the Commercial Club Building at 1100 S. Broadway and the Los Angeles Railway Building at 1060 S. Broadway. Similar to Hill Street, by the 1970s there were also many surface parking lots in the area as a result of the demolition of older buildings. Although the Proposed Project would introduce a new visual element to the area, the Western Pacific Building would retain its integrity of setting. The most important aspect of the broad setting of the Western Pacific Building is its relationship with the Commercial Club Building and Los Angeles Railway Building on the south. These three buildings are similar in height, massing, materials, and design, and create a strong sense of place at S. Broadway and W. 11th Street. That relationship would not be altered by the construction of a new building behind the Western Pacific Building. Furthermore, the portion of the new building to the rear of the Western Pacific Building is only nine stories in height, which is lower than the 12-story Western Pacific Building.

Both historical resources would continue to convey their significance, which is primarily architectural. Setting is not a critical factor of integrity of buildings that are architecturally significant. Especially when they occupy their entire parcels like the Mayan Theater and Western Pacific Building. Thus, there would be no indirect impact from the Proposed Project on historical resources.

Projects that comply with the Standards are considered mitigated to a less than significant level. As the Proposed Project does not involve the preservation, rehabilitation, restoration, or reconstruction of a historic building, the Standards are not directly applicable. To that end, Rehabilitation Standards #9 and #10 are relevant but not determinative in analyzing the indirect impact of new construction on a historic building. Rehabilitation Standards #9 and #10 primarily address additions to historic buildings or new construction within the boundaries of a historic property or district, which is not the case with the Proposed Project. Nevertheless, to be conservative, the Proposed Project's compliance with Standards #9 and #10 is discussed below.

Compliance with Standard #9

The Standard states: "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment."

The new building would be located directly north of the Mayan Theater, which is located on a separate parcel to the south. The Mayan Theater is not a part of the Proposed Project; thus, the new building would not destroy historic materials, features, and spatial relationships that characterize the property. The north elevation of the Mayan Theater is an unarticulated blank wall that is not a character-defining feature. The historic building was clearly designed in anticipation of the construction of another building on the neighboring parcel. Thus, the spatial relationship between the Mayan Theater and its immediate environment would remain intact. While the Mayan Theater ranges in height from two stories at the front and seven stories at the rear, the tower portion of the new building would be 60 stories in height. However, the podium portion next to the Mayan Theater would be only nine stories in height. Within the context of Downtown Los Angeles, this would not be an unusual juxtaposition of heights. The podium portion of the new building would be differentiated from the Mayan Theater by its contemporary design. As the Mayan Theater is so unique in its design, a contemporary design that consists of a regular grid is more appropriate than an attempt to mimic any aspect of Mayan Revival architecture.

The new building would be located northwest of the Western Pacific Building, but separated by an alley. The Western Pacific Building is not a part of the Proposed Project thus the new building would not destroy historic materials, features, and spatial relationships that characterize the property. The west, or rear, elevation of the Western Pacific Building is utilitarian in design. One-over-one double-hung sash metal windows are stacked vertically across the elevation, which is sheathed in stucco and without ornamentation. The historic building was clearly designed in anticipation of the construction of another building across the alley. Thus, the spatial relationship between the Western Pacific Building and its immediate environment would remain intact. The eight-story podium portion of the new building is compatible with the height of the 12-story Western Pacific Building. The compatibility of the materials and features between the new and historic buildings is not required in the instance, as they are both rear elevations separated by an alley.

In conclusion, the Proposed Project complies with Standard #9 to the extent appropriate for this area of Downtown Los Angeles.

Compliance with Standard #10

The Standard states: "New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired."

The Proposed Project complies with Standard #10. The new building is sufficiently separated from the Mayan Theater and Western Pacific Building. In the case of the Mayan Theater there will be a typical gap between buildings with shared property lines (the gap is located on the Mayan Theater property). In the

case of the Western Pacific Building there is an alley separating it from the new building. If the new building were removed in the future, the adjacent historical resources would not be materially affected. The essential form and integrity of the historical resources and their environment would be unimpaired.

The Proposed Project would have no direct impacts on historical resources. There are no historical resources on the Project Site and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Proposed Project. Indirect impacts on historical resources were also analyzed. The Proposed Project would have a less than significant impact on the historical resource near the Project Site. Although the Proposed Project would introduce a new visual element to the area, it would be physically separated from the Western Pacific Building by an alley. The new building would be located north of the Mayan Theater. However, the Proposed Project would not result in a substantial adverse change to the immediate surroundings of this historical resource to the degree its eligibility, as a resource would be materially impaired. It would continue to be eligible for listing as historical resource defined by CEQA. No mitigation is required or recommended. Therefore, development of the Proposed Project would result in a less than significant impact to historic resources.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources. No known archaeological sites are identified on the Project Site. There is no evidence that suggests any archaeological sites or archaeological resources exist on the Project Site.[14] The Project Site has been previously developed and is located in a highly urbanized area of the Central City Community Plan area in the City of Los Angeles. The Project Site is developed with a surface parking lot and has been previously disturbed. The Proposed Project would include the demolition of the surface parking lot and grading activities for construction of a proposed high-rise mixed-use building with residential dwelling units and ground-floor commercial with seven subterranean parking levels. Construction of the Proposed Project would anticipate the excavation to a depth of approximately 80 feet below grade to allow for the proposed subterranean parking levels.

Thus, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the Project Site is excavated, the Department of City Planning requires adherence to regulatory compliance measures for proper handling of any archaeological resources discovered during construction. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

[14] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

Adherence to regulatory compliance measures would ensure that if any archaeological resources are encountered during construction, impacts to such resources would remain less than significant.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries (see Public Resources Cod, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if grading activities associated with the proposed project would disturb previously interred human remains. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains could occur on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98.

Compliance with regulatory compliance measures would ensure any potential impacts related to the disturbance of unknown human remains would be less than significant.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate mitigation. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

VI. ENERGY. Would the project:

a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	❑	❑	☒	❑
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	❑	❑	☒	❑

a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact (Responses a and b). In order to determine if the Project would result in a

potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during the project construction or operation, an analysis of the Project's energy use for all phases of the project has been provided. Additionally, the analysis discusses the Project's compliance with existing state and local regulations which have been adopted to reduce energy consumption. Section 15126.2(b) of the CEQA Guidelines refers to Appendix F of the CEQA Guidelines as guidance for the information to be provided in the analysis.

Appendix F: Energy Conservation of the State CEQA Guidelines states the goal of conserving energy implies the wise and efficient use of energy. The State CEQA Guidelines outlines three means to achieve this goal:

1. Decreasing overall per capita energy consumption,

2. Decreasing reliance on fossil fuels such as coal, natural gas and oil, and

3. Increasing reliance on renewable energy sources.

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on energy conservation shall be made considering the following factors: a) the extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; b) whether and when the needed infrastructure was anticipated by adopted plans; and c) the degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

The Proposed Project would develop a mixed-use building on an infill site, which would contribute to the revitalization of the Central City Community Plan area. As a mixed-use project with both residential and commercial land uses, the Proposed Project would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards for Residential and Nonresidential Buildings located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2016 Standards will continue to improve upon the 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2016 Standards is January 1, 2017.[15] The Energy Efficiency Standards are a specific response to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Proposed Project includes energy efficiency components to conserve energy, which are detailed below.

[15] *California Energy Commission, 2016 Building Energy Efficiency Standards, website: http://www.energy.ca.gov/title24/2016standards/, accessed February 2019.*

Existing Infrastructure

The Project Site is located in a highly urbanized area in Downtown Los Angeles and is adequately served with roads, sidewalks, and underground utilities. Since the Project Site is developed with a surface parking lot, which utilizes little to no energy consumption, the Proposed Project would generate an increase in energy consumption as compared to existing conditions. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be limited in nature and conducted within the existing public right-of-way easements serving the Project area, and thus would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within previously developed public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant.

Electricity (provided by the LADWP) and natural gas (provided by Southern California Gas) service and supplies are available in the immediate project vicinity and would be provided to the Project Site. The availability of electricity and natural gas is dependent upon adequate generating capacity, adequate fuel supplies, and a reliable distribution system. The estimated power requirement for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.

Energy Consumption

Construction

Construction of the Proposed Project would generate an increased demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the excavation and grading phase, and the consumption of gasoline and diesel fuels associated with haul trucks, deliveries, and worker commute trips. Construction activities typically do not require the consumption of natural gas to power equipment or heavy machinery. The total electricity, gasoline and diesel fuel anticipated to be used during construction is summarized in Table VI-4, Summary of Energy Usage During Construction, below. As shown in Table VI-4, construction of the Proposed Project would consume approximately 5,145 kWh of electricity, 1,024,622 gallons of gasoline, and 560,027 gallons of diesel fuel.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. Further, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure. Accordingly, energy demands during construction would be less than significant.

Table VI-4
Summary of Energy Usage During Construction

Fuel Type	Quantity
Electricity	
Water Use	**5,145 kWh**
Gasoline	
On-Road Vehicles (Workers Trips)	**1,024,622 gallons**
Diesel	
On Road Construction Equipment (Vendors/Deliveries)	406,916 gallons
On Road Construction Equipment (Haul Trips)	113,188 gallons
Off-Road Construction Equipment	39,924 gallons
Subtotal Diesel	**560,027 gallons**
Energy calculation worksheets are provided in Appendix I to this SCEA.	

Operation

Electricity

As shown in Table VI-5, below, the estimated net increase in electricity consumption by the Proposed Project's operational use would be approximately 4,413,000 kWh per year. As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.

The Proposed Project would include energy conservation features. Specifically, the residential units would include energy efficient lighting fixtures, ENERGY Star rated appliances for residential dwelling units, low-flow water features, and energy efficient mechanical heating and ventilation systems. Thus, the Proposed Project's 700 residential units would incorporate energy conservation features. As provided in Appendix D, Greenhouse Gas Emissions, and summarized in Table VI-5, below, the energy usage for the Proposed Project is 5,739,480 kWh/yr.

Table VI-5
Estimated Electricity Consumption by the Proposed Project

Land Use	Size	Total (kilowatt hours/year)
Proposed Project		
Residential Uses	700 du	2,772,060
Enclosed Parking (with Elevator)		2,519,800
Retail	7,000 sf	353,120
Restaurant	8,000 sf	94,500
Proposed Project Total Net Electricity Demand		**5,739,480**

Notes:
du: dwelling unit; sf: square feet; kWh = kilowatt-hour
[a] See Annual CalEEMod Worksheets provided in Appendix D to this SCEA.
Source: Parker Environmental Consultants, 2018.

Natural Gas

Natural gas for the Project Site is provided by Southern California Gas Company ("SCG"). Gas supply available to SCG from California sources averaged 122 million cf/day in 2015. SCG projects total natural gas demand to decrease at an annual rate of 0.6 percent per year from 2016 to 2035. This decrease is due to more efficient power plants, pursuing demand-side reductions, and the acquisition of preferred power generation resources that produce little or no carbon emissions. Thus, with the natural gas consumption becoming more efficient and decreasing, the SCG's projection for natural gas also decreases. Interstate pipeline delivery capability into SCG on any given day is theoretically approximately 6,725 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SCG's estimated physical capacity of upstream pipelines. SCG's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet; of that, 83 billion cubic feet is allocated to residential, small industrial and commercial customers.[16] As shown in Table VI-6, below, the natural gas consumption as a result of the operation of the Proposed Project, approximately 8.3 million cubic feet per year, would represent a very small fraction of one percent of the SCG's existing natural gas storage capacity and therefore, would be within the SCG's existing natural gas storage capacity of 83 billion cubic feet as of 2016.

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption.

[16] *California Gas and Electric Utilities, 2016 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, accessed May 2017.*

Table VI-6
Estimated Natural Gas Demand by the Proposed Project

Land Use	Size	Total kBTU/yr	Total (CF/year)
Proposed Project			
Residential Uses	700 du	6,451,860	6,288,362
Enclosed Parking (with Elevator)		0	0
Retail	7,000 sf	1,846,080	1,799,298
Restaurant	8,000 sf	11,480	11,189
Proposed Project Total Net Natural Gas Demand		**8,309,420**	**8,309,420**

Notes:
du: dwelling unit; sf: square feet; kWh = kilowatt-hour
[a] See Annual CalEEMod Worksheets provided in Appendix D to this SCEA.
Source: Parker Environmental Consultants, 2018.

Fossil Fuels

Operation of the Proposed Project would generate vehicle trips associated with people driving to the site for work or home and driving to and from work and other destinations throughout the region. Based on the trip generation rates provided in the Project Traffic Study, and the vehicle trip lengths calculated in the CalEEMod air quality worksheets, it is estimated that operation of the Proposed Project would result in approximately 12,321,095 annual vehicle miles traveled on an annual basis.[17] Based on this data, it is further estimated that the Proposed Project's VMTs would result in the annual consumption of approximately 408,530 gallons of gasoline fuel and 117,905 gallons of diesel fuel.[18] The Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas and oil. The Project Site is located in Downtown Los Angeles, which is at the hub of the regional transit network in the Los Angeles area. The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority ("Metro"), LADOT DASH and Commuter Express, Santa Monica Big Blue Bus ("BBB"), and the Foothill Transit Silver Streak. The Project Site is served by two nearby Metro Stations within walking distance: the 7th Street/Metro Center Station is located approximately 0.5 miles northwest of the Project Site and the Pico/Flower Station is located approximately 0.4 miles west of the Project Site. These stations also provide transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a reasonable walking distance (approximately one-half mile) of the Project include (2, 4, 10, 14, 20, 28, 30, 33, 35, 40, 45, 51, 55, 60, 66, 70, 71, 76, 78, 81, 83, 90, 92, 94, 96, 720, 745, 760, 770, and 794).[19] Due to its proximity to the bus stops and Metro stations aforementioned, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

[17] *See CalEEMod Worksheets included as Appendix A to this SCEA.*

[18] *Refer to Fuel Consumption Calculations included as Appendix I, Energy Consumption Worksheets, in this SCEA.*

[19] *Fehr & Peers, Olympic & Hill Project Draft Transportation Impact Analysis, January 2018. See Appendix H of this SCEA.*

Additionally, as an infill development, Proposed Project would incorporate a mix of residential, retail, and restaurant uses. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby. As discussed in the Traffic Study (see Appendix H of this SCEA), because the commercial component of the Proposed Project would be primarily serving to the proposed development and surrounding project area, some of the trips might be expected to be walk-ins either from the Proposed Project or the surrounding area. Certain adjustments to the trip generation were therefore made, with LADOT approval, to reflect these conditions. For the trips generated by the residential uses, a reduction of 3% for internal trips from the Proposed Project from the surrounding area were applied. For the trips generated by the retail uses, a reduction of 39% for internal trips from the Proposed Project, 5% for use of transit and walk-ins from the surrounding area, and a pass-by rate of 50% were applied. For the trips generated by the restaurant uses, a reduction of 24% for internal trips from the Proposed Project, 8% for use of transit and walk-ins from the surrounding area, and a pass-by rate of 10% were applied. The reduction in vehicle trips, due to the Proposed Project's mixed-use programming and the Project Site's location in a transit-oriented district, would therefore decrease the Proposed Project's reliance on fossil fuels. Further, the Proposed Project proposes a Transportation Demand Management (TDM) program that would result in an addition 15% reduction to the vehicle trips estimated above. Pursuant to LAMC 99.04.106.4.2, a minimum of 5% of the total code required parking is required to be capable of supporting future electric vehicle supply equipment (EVSE). The provision of EVSE infrastructure would further serve to promote the utilization of alternative fueled vehicles thus reducing the combustion of fossil fuels. Based on these factors, the Project's vehicle trips would decrease overall per capita energy consumption, decrease reliance on fossil fuels, and would serve to promote reliance on renewable energy sources.

Renewable Energy

The LADWP's 2015 Power Integrated Resource Plan (IRP) serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. The 2015 IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The 2015 IRP outlines an aggressive strategy for LADWP to accomplish its goals and provide sufficient resources over the next 20 years given the information presently available, including the following major strategic initiatives: (1) Eliminate Coal from LADWP's Power Supply, (2) Reach 33 percent renewable portfolio standard by 2020 and 50 percent by 2030, including a goal of 800 MW Local Solar, (3) Achieve 15 percent energy efficiency by 2020, (4) Eliminate the use of Once-through Cooling by Repowering Coastal Units by 2029, (5) Invest in the Power System Reliability Program, and (6) Promote a high scenario of Transportation Electrification. As the project will derive its electricity from the LADWP, the project's energy demands will primarily be derived from renewable energy sources. On a project specific level, the Proposed Project includes the following features which will further reduce energy demands:

1. *Proximity to mass transit:* The Project Site is an infill site within a Transit Priority Area as defined by CEQA. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less.

2. *In-Fill Smart Growth:* The Proposed Project is located on an existing infill site that is currently developed with a surface parking lot, which is located in a highly developed area of downtown Los Angeles. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

3. *Trip Reduction:* In addition to its location in a Transit Priority Area, the Proposed Project would also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 182,386). Pursuant to LAMC Section 12.21 A.16*(a)(1)(i)*, the Proposed Project is required to supply 32 short-term bicycle parking spaces and 250 long-term bicycle parking spaces, for a total of 290 bicycle parking spaces. The Proposed Project proposes to provide 290 spaces consistent with the allocation provisions for long-term and short-term spaces. Additionally, the Project would provide unbundled parking, where the cost of purchasing or renting parking spaces is separated from the cost of the purchasing or renting a dwelling unit. This incentivizes residents to choose alternative modes of transportation over automobile ownership. Upon discussion with LADOT, a 15% TDM credit was applied to the residential trip generation estimates for the Project.

4. *Resource Conservation:* As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to meet Title 24 2016 standards and include ENERGY STAR appliances. The Proposed Project would incorporate energy conservation features in the proposed residential units such as low-flow water fixtures and energy conservation appliances.

Therefore, with incorporation of the features identified above, the Proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	❑	❑	☒	❑
iii. Seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions?	❑	❑	❑	☒
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	❑	❑	❑	☒
b. Result in substantial soil erosion or the loss of topsoil?	❑	❑	☒	❑
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse caused in whole or in part by the project's exacerbation of existing environmental conditions?	❑	❑	☒	❑
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?	❑	❑	❑	☒
e. 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?	❑	❑	❑	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	❑	❑	☒	❑

The following section summarizes and incorporates the reference information from the following report(s):

- Geotechnical Investigation, Proposed High-Rise Development "Olympic and Hill" 1000-1034 Hill Street and 220 & 226 West Olympic Boulevard, Los Angeles, California ("Geotechnical Investigation"), prepared by Geocon West, Inc., dated February 28, 2017; and
- Soils Report Approval Letter (Log # 98134), issued by the Grading Division of the Department of Building and Safety, dated June 6, 2017.

Regulatory Compliance Measures

The following Regulatory Compliance Measures are required in conjunction with the Proposed Project.

- **Geology (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

- **Geology (Geotechnical Investigation):** The Proposed Project shall comply with the conditions contained within the Department of Building and Safety's Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified.

- **Geology (Erosion/Grading/Short-Term Construction Impacts):** Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following:
    - Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

    - Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

- **Cultural Resources (Paleontological):** Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and:
    - The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
    - The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
    - The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
    - Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum

The Proposed Project would also implement Regulatory Compliance Measure, "Hydrology (National Pollutant Discharge Elimination System General Permit," located under Section 9, Hydrology and Water Quality, which would reduce the potential for soil erosion and loss of topsoil.

Existing Soil and Geologic Conditions

Based on the field investigation and published geologic maps of the area, the Project Site is underlain by artificial fill and unconsolidated Holocene age alluvium consisting of gravel, sand, silt and clay derived from the Elysian and Repetto Hills to the north and the Los Angeles River to the east. Artificial fill was

encountered in the explorations to a maximum depth of 10 feet below existing ground surface. The artificial fill generally consists of brown to light yellowish brown silty sand and sandy silt with fine to coarse gravel and abundant brick fragments. The artificial fill is characterized as fine- to medium-grained, slightly moist, and loose to medium dense or stiff. The fill is likely the result of past grading and construction activities at the Project Site. Deeper fill may exist between excavations and in other portions of the Project Site that were not directly explored. Holocene age alluvium was encountered beneath the fill. The alluvium generally consists of yellowish brown to grayish, brown poorly and well graded sand and silty sand with varying amounts of silt, fine to coarse gravel and cobbles. The alluvial soils are primarily fine- to coarse-grained, slightly moist and very dense. Groundwater was not encountered in the field explorations excavated to a maximum depth of 125 feet below the existing ground surface. Detailed stratigraphic profiles of the materials encountered at the Project Site are provided on the boring logs in Appendix C of this SCEA.

PROJECT-SPECIFIC IMPACTS

a) Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Project would have a significant impact related to geology and soils if the project exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions. The closest surface trace of an active fault to the Project Site is the Hollywood Fault located approximately 4.9 miles to the north; and the closest potentially active fault to the Project Site is the MacArthur Fault located approximately 0.6 mile to the north. The Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone or a City-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site during the design life of the proposed development is considered low. As such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to rupture of a known fault, and potential impacts would be less than significant.

(ii) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. The Project would have a significant impact related to geology and soils if the project exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions. The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends upon the earthquake magnitude, the distance from the source, and the site response characteristics. The closest surface trace of an active fault to the Project Site is the Hollywood Fault located approximately 4.9 miles to the north; and the closest potentially active fault to the Project Site is the MacArthur Fault located approximately 0.6 mile to the north. However, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act.[20] The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

Accordingly, the design and construction of the Proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, as well as the applicable recommendations of the Geotechnical Investigation which would ensure impacts associated with seismic hazards would remain less than significant. Therefore, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to ground shaking.

(iii) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. The Project would have a significant impact related to geology and soils if the Project exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by

[20] *Geocon West, Inc., Geotechnical Investigation, Proposed High-Rise Development "Olympic and Hill" 1000-1034 Hill Street and 220 & 226 West Olympic Boulevard, Los Angeles, California, February 28, 2017 (See Appendix C to this SCEA).*

earthquake accelerations.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

The State of California Seismic Hazard Zone Map for the Hollywood Quadrangle (1999) indicates that the Project Site is not located in an area identified as having a potential for liquefaction. In addition, a review of the County of Los Angeles Safety Element (Leighton, 1990) indicates that the Project Site is not located within an area identified as having a potential for liquefaction. Also, as previously discussed, the historic high groundwater level beneath the Project Site is at a depth of approximately 110 feet below the existing ground surface and groundwater was not encountered in the borings (drilled to a maximum depth of 125 beneath the existing ground surface). Based on these considerations, the potential for liquefaction and associated ground deformations beneath the Project Site is very low. Therefore, no impact would occur. The Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to liquefaction.

(iv) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. The Project would have a significant impact related to geology and soils if the Project exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The topography at the Project Site is relatively level and the topography in the immediate site vicinity slopes gently to the southeast. The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area (City of Los Angeles, 2017). The County of Los Angeles Safety Element (Leighton, 1990), indicates the Project Site is not within a hillside area or an area identified as having a potential for slope instability. Additionally, the Project Site is not within an area identified as having a potential for seismic slope instability (CDMG, 1999). There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the Proposed Project is considered low. Therefore, no impact would occur. The Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides.

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

Less Than Significant Impact. Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and grading/excavation activities, erosion would be reduced

by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would be mostly paved-over or built upon so little soil would be exposed. 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, excavation, and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The application of Best Management Practices ("BMPs") includes but is not limited to the following regulatory compliance measures: (1) Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity; and (2) Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

Additionally, prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Compliance with regulatory measures would ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil and as such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to the loss soil erosion or loss of topsoil.

c) Would the project be located on a geologic unit 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 caused in whole or in part by the project's exacerbation of existing environmental conditions?

No Impact. The Project would have a significant impact related to geology and soils if it is located on a geologic unit 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 caused in whole or in part by the project's exacerbation of existing environmental conditions. As noted above, the Project Site is not within a liquefaction zone and is not located in an area susceptible to liquefaction or collapse. Additionally, the Project Site is relatively level, with no pronounced highs or lows. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity, and there is little or no potential for subsidence. The Geotechnical Investigation concluded that geotechnical conditions are favorable for the Proposed Project provided that the recommendations specified in the Geotechnical

Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Accordingly, the design and construction of the Proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated with unstable geologic unit or soils remain less than significant. As such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides, lateral spreading, subsidence, liquefaction or collapse.

With the implementation of Building Code requirements and regulatory compliance measures, above, there would be no potential impact with respect to risks associated with landslide, lateral spreading, subsidence, liquefaction, or collapse.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?

No Impact. Based on the results of the Geotechnical Investigation, the proposed structure would not be prone to the effects of expansive soils. Although not anticipated for the Proposed Project, all imported fill shall be observed, tested, and approved by Geocon West prior to bringing soil to the Project Site. Rocks larger than 6 inches in diameter shall not be used in the fill. If necessary, import soils used as structural fill should have an expansion index less than 20 and corrosivity properties that are equally or less detrimental to that of the existing onsite soils. Reinforcing beyond the minimum required by the City of Los Angeles Department of Building and Safety is not required. Therefore, no impact would occur with respect to expansive soils.

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. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, no impact would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously graded and is currently improved with a paved surface parking lot. The Project Site does not contain any known vertebrate

paleontological resources.[21] This is further supported by correspondence received from the Natural History Museum of Los Angeles County dated July 14, 2017 (contained in Appendix B), which states that no vertebrate fossil localities lie directly within the Project Site boundaries. However, there are identified localities near the Project Site at the same sedimentary deposits that occur in the Project Site. The closest vertebrate fossil locality from the Older Quaternary deposits is LAMC 1755, southwest of the Proposed Project near the intersection of Hill Street and 12th Street. As such, although no paleontological resources are known to exist on-site, there is a potential for paleontological resources to exist at sub-surface levels on the Project Site, which may be uncovered during grading activities for construction of the Proposed Project's subterranean parking levels. As standard condition of approval for issuing a grading permit, all grading contractors are required to notify the City of Los Angeles Department of Building and Safety if paleontological resources are discovered during excavation, grading, or construction, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines.

Under California Public Resources Code Sections 5097.5 and 30244, development projects that involve excavations are required to implement regulatory compliance measures. Implementation of the following measures pertaining to paleontological resources would ensure that any resources found during the construction phase would be handled according to proper regulations. With adherence to the following standard compliance measures, any impacts to paleontological resources would be less than significant.

If any paleontological materials are encountered during the course of project development, all further development activities shall halt and:

a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
b. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

CUMULATIVE IMPACTS

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and any of the related projects. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate

[21] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that, through the implementation of the regulatory compliance measures recommended above, Proposed Project impacts would be reduced to less than significant levels. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	❑	❑	☒	❑
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	❑	❑	☒	❑

GHG and Global Climate Change Background

Gases that trap heat in the atmosphere are called greenhouse gases ("GHG"), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Regulatory Environment

Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.[22] The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.[23] It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030

[22] *CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.*

[23] *Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2020, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.*

compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California's climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the greenhouse gas (GHG) emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases (GHGs) from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Proposed Project would be exempt from the Cap-and-Trade program, since it only proposes residential and commercial uses and does not propose any industrial or high-emitting land uses. On July 2018, CARB recently announced that greenhouse gas pollution in California fell below 1990 levels, which was the 2020 greenhouse gas emissions goal passed by AB 32.[24]

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent

[24] *California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time, accessed August 2018.*

by 2010.

On April 2, 2011, Governor Jerry Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

With respect to motor vehicles, page 48 of the 2008 Scoping Plan states that local governments will play a significant role in the regional planning process to reach passenger vehicle greenhouse gas emissions reduction targets. Local governments have the ability to directly influence both the siting and design of developments in a way that reduces greenhouse gases associated with vehicle travel, as well as energy, water, and waste. A partnership of local and regional agencies is needed to create a sustainable vision for the future that accommodates population growth in a carbon efficient way while meeting housing needs and other planning goals. Integration of the sustainable communities' strategies or alternative planning strategies with local general plans will be key to the achievement of these goals. State, regional, and local agencies must work together to prioritize and create the supporting policies, programs, incentives, guidance, and funding to assist local actions to help ensure regional targets are met. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in helping to reach regional targets. Thus, based on the above targets noted in the Scoping Plan, a new development Project that can demonstrate it directly influences both the siting and design of new developments in a way that reduces greenhouse gases associated with vehicle travel would be considered consistent with statewide GHG-reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

2016-2040 RTP/SCS

On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016-2040 RTP/SCS). Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in High-Quality Transit Areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016-2040 RTP/SCS concluded that GHG emissions per capita relative to 2005 emissions would be reduced by 8% in 2020, 18% in 2035, and 21% in 2040 in the SCAG region, which would exceed CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons (MT) of CO2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO2e per year for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has not adopted a GHG significance threshold for land use development projects (e.g., residential/commercial projects). Although SCAQMD formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds, this group has not met since 2010.

Local Policies and Regulations

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

City of Los Angeles Sustainable City pLAn

On April 8, 2015, Mayor Eric Garcetti released the Los Angeles' first ever Sustainable City pLAn (The pLAn). The pLAn sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAn is made up of short-term (by 2017) and long-term (2025 and 2035) targets. The pLAn set out an ambitious vision for cutting greenhouse gas emissions, reducing the impact of climate change and building support for national and global initiatives. Los Angeles has moved to the forefront of climate innovation and leadership through bold actions on energy efficiency and electric vehicle as well as renewable energy and greenhouse gas accounting. L.A. has already reduced its greenhouse gas emissions by 20% below 1990 levels as of 2013, nearly halfway to the goal of 45% below by 2025. The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

LA Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code by 20%, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. New development projects are required to comply with the *L.A. Green Building Code,* and therefore are generally considered consistent with statewide GHG-reduction goals and policies, including SB 32.

GHG Significance Threshold

The *L.A. CEQA Thresholds Guide* does not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a mixed-use project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Proposed Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Projects increase greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to

implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Guidelines Section 15064.4 states a lead agency "should consider," among other factors, "[t]he extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting" (id., subd. (b)(1)) and "[w]hether the project emissions exceed a threshold of significance that the lead agency determines applies to the project" (id., subd. (b)(2). The Guidelines, however, do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions.

For purposes of this analysis, a significant impact would occur if the Proposed Project's design features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's 2016-2040 RTP/SCS, and the LA Green Building Code.

Project Design Features:

The following Project Design features would be implemented as part of the Proposed Project.

- The Proposed Project is located on an infill development site that is currently improved with a paved surface parking lot. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.
- The Project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the 700 dwelling units.
- The Project is subject to construction waste reduction of at least 65 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 65 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.
- As mandated by the LA Green Building Code, the Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. An approximate 20% reduction in water demand and associated GHG emissions is attributable to compliance with this feature.
- The Proposed Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
- The Proposed Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.
- The Proposed Project would include a minimum of five percent of the total number of parking spaces to include Electric Vehicle (EV) Charging Stations.
- The Project would be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

Regulatory Compliance Measure:

The following Regulatory Compliance Measure is required in conjunction with the Proposed Project.

- **Greenhouse Gas Emissions (Green Building Code):** In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.

PROJECT-SPECIFIC IMPACTS

a) Would the project generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 30-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for each year of construction of the Proposed Project and the results of this analysis are presented in Table VI-7, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table VI-7, the total GHG emissions from construction activities related to the Proposed Project would be 4,298 metric tons, with the highest GHG emissions occurring in the year 2019.

Table VI-7
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2018	501
2019	2,181
2020	1,479
2021	137
Total Construction GHG Emissions	**4,298**

[a] Construction CO_2 values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix D, Greenhouse Gas Emissions Calculations Worksheets.
Parker Environmental Consultants, 2017.

Operation

Baseline GHG Emissions

The Project Site is currently improved with a surface parking lot that provides general parking for other land uses in the surrounding area. The vehicle trips associated with the vehicles that park on-site are not generated by on-site land uses and would occur even if the Project Site were to cease operations as a surface parking lot. As such, the baseline GHG emissions for the existing uses are assumed to be zero.

Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Proposed Project's compliance with the Green Building Code and other mitigating features that would be effective in reducing GHG emissions. The Proposed Project's emissions were estimated using CalEEMod for a base project without the enhanced energy conservation measures mandated by the Green Building Code and with GHG reduction measures to effectively estimate the net benefit of code compliance measures in terms of a reduction in GHG emissions. As shown in Table VI-8, below, the net increase in GHG emissions generated by a baseline project without GHG reduction measures would be 9,874.66 CO_2e MTY and the Proposed Project with adherence to GHG reduction measures would result in a net increase of 8,925.45 CO_2e MTY. For purposes of this comparison, it should be noted that the Proposed Project's structural and operational features would include installing energy efficient lighting, low flow plumbing fixtures, ENERGY STAR-rated appliances, and implementing an operational recycling program during the life of the Project. When considering the fact that the Project is an infill development and is recycling land and reutilizing existing structures, which is encouraged through the state, regional and local plans and policies (i.e., SB32, SB375, and SCAG's 2016 RTP/SCS growth strategy), the Proposed Project would realize a 9% reduction in GHG emissions as compared to a base project of the same size without replacing an existing land use. The percent reduction calculated above is not a quantitative threshold of significance, but shows the efficacy of the Proposed Project's compliance with the various regulations, plans, and policies

that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.

Table VI-8
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)		
	Project Without GHG Reduction Measures	Proposed Project	Percent Reduction
Area	181.20	181.20	0%
Energy	3,649.27	3,649.27	0%
Mobile	5,131.46	4,361.74 [a]	15%
Waste	169.30	84.65	50%
Water	600.15	505.31	16%
Construction Emissions [b]	143.28	143.28	--
Project Net Total	**9,874.66**	**8,925.45**	**10%**

Notes:
1. Project Without GHG Reduction Measures estimates GHG emissions from mobile trips without TDM Program; the GHG emissions under Proposed Project incorporates a 15% reduction in daily trips from TDM Program per the Project Traffic Study (See Appendix H).
2. The total construction GHG emissions were amortized over 30 years and added to the operation of the Proposed Project. Calculation data and results provided in Appendix D, Greenhouse Gas Emissions Calculations Worksheets.
Source: Parker Environmental Consultants, and Eyestone Environmental 2018.

Through required implementation of the Green Building Code and because of the Proposed Project's location on an infill site as well as the Site's walkability and proximity to regional transit systems, the proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's SB 32 Scoping Plan. Moreover, as demonstrated below, the Proposed Project is consistent with the Scoping Plan, SB 375, SCAG's 2016 RTP/CSC, and the L.A. Green Building Code. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

Consistency with AB 32 Scoping Plan

Table VI-9
Consistency with Applicable AB 32 Scoping Plan Measures

AB 32 Scoping Plan Measures	Consistency Analysis
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent**. The Project would be designed and constructed to meet LA Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, installing ENERGY Star rated appliances, and infrastructure to support electric vehicle supply equipment.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent**. The Project would use energy from the Los Angeles Department of Water and Power (LADWP),

	which has goals to diversify its portfolio of energy sources to increase the use of renewable energy to 35%.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent**. The Project would be designed and constructed to meet LA Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, installing ENERGY Star rated appliances, and infrastructure to support electric vehicle supply equipment.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	**Consistent**. The Project would result in a less than significant impact on landfill capacity. (see response to Checklist Question 18(d), below). It would meet the City's 70 percent waste diversion rate goal and comply with the City's Zero Waste Plan, which will reduce solid waste, increase recycling, and manage trash in the City through the year 2030.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent**. The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use. As part of its application for a water supply assessment from the LADWP, the Applicant has committed to implement the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project: o High Efficiency Toilets with flush volume of 1.0 gallons of water per flush o Energy Star Certified Clothes Washers (Residential) – water factor of 3.2 and capacity of 4.5 cu-ft, front loading o Showerheads with flow rate of 1.5 gallons per minute or less o Drought Tolerant Plants – 70% of total landscaping o Domestic Water Heating System located close proximity to point(s) of use o Individual Metering and billing for water use for every residential dwelling unit and commercial unit o Drip/Subsurface Irrigation (Micro-Irrigation) o Proper Hydro-zoning (groups plants with similar water requirements together) Zoned Irrigation The Applicant has also committed to comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181899 and No.183833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Project as feasible, pending final determination.
Measures not listed are not applicable to this project. *Source: Parker Environmental Consultants, 2017.*	

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable

Community Strategy to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Project's consistency with the SCS is provided further below.

Consistency with 2016-2040 RTP/SCS

The Project would be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

The Project represents an infill development within an existing urbanized area that would concentrate new residential and neighborhood serving commercial uses within a High Quality Transit Area (HQTA), the 2016-2040 RTP/SCS defines as generally walkable transit villages or corridors that are within 0.5-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site is served by two nearby Metro Stations within one-half mile of the Project Site. The Pico/Flower Station is located approximately 0.4 miles west of the Project Site and the 7th Street/Metro Center Station is located approximately 0.5 miles northwest of the Project Site. In addition, the Project would also provide bicycle storage areas for Project residents and guests. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016–2040 RTP/SCS. Refer to Table III-2 of Section III, Transit Priority Projects and the SCEA, for the Proposed Project's consistency analysis with the 2016-2040 RTP/SCS.

Consistency with L.A. Green Building Code

The L.A. Green Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission, meet 50 percent construction waste recycling levels, provide on-site storage for short and long term bicycle parking areas, provide Energy Star rated appliances were applicable, and provide electric vehicle supply wiring for 5% of the project's code required parking. The Project would comply with these mandatory measures. Therefore, the Project is consistent with the L.A. Green Building Code.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the Proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. The Proposed Project would comply with the City of Los Angeles' Green Building Ordinance standards that reduce emissions beyond the "Business-as-Usual" scenario, and are consistent with the SB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the state's codes. The Proposed Project would incorporate several measures and design elements that reduce the carbon footprint of the development:

1. Infill Development. The Proposed Project is located on an infill site that is currently developed with a surface parking lot. The Proposed Project would include the demolition of the existing land uses which would off-set some of the Project's operational emissions. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

2. Transit Priority Area. The Proposed Project is also located in a Transit Priority Area as defined by CEQA Sections 21099 and 21064.3. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. The Proposed Project's mixed-use nature and close proximity to neighborhood-serving restaurant/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone residential uses that are not located in close proximity to transit.

3. Energy Conservation. The Proposed Project must meet Title 24 2016 standards for residential and non-residential uses and include ENERGY STAR-rated appliances.

4. Solid Waste Reduction Efforts. California Green Building Code Section 4.408.1, imposes mandatory measures for residential projects that require developers to recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 50 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.

5. Water Conservation. The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through

4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20%. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.

As described above and in Question 7(a), the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the L.A. Green Building Code, and CARB's 2017 Scoping Plan. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases and, the Proposed Project's impact would be less than significant.

CUMULATIVE IMPACTS

The GHG emissions from mixed-use residential and commercial development are relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on global warming. Furthermore, the Proposed Project would be consistent with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	❑	❑	☒	❑
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	❑	☒	❑	❑

c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	❑	❑	☒	❑
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	❑	☒	❑	❑
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	❑	❑	❑	☒
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	❑	❑	❑	☒
g.	Expose people or structures, either directly or indirectly, 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?	❑	❑	❑	☒

The following section summarizes and incorporates the reference information from the following reports:

- Phase I Environmental Site Assessment, W Olympic Boulevard and S Hill Street Property, Los Angeles, California, 90015 ("Phase I ESA"), prepared by Advantage Environmental Consultants, LLC ("AEC"), dated April 25, 2017; and
- Site Methane Investigation Report for New mixed-use complex with seven subterranean levels 1000-1034 S. Hill Street/220-226 W. Olympic Boulevard, Los Angeles, CA – 90015 ("Methane Report"), prepared by Methane Specialists, dated April 21, 2017.

The Phase I ESA is included as Appendix E, and the Methane Report is included as Appendix F of this SCEA. The purpose of the Phase I ESA was to identify any Recognized Environmental Conditions (RECs) in connection with the Project Site. The term REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term REC includes hazardous substances or petroleum products even under conditions in compliance with laws. The purpose of the Methane Report was to measure subsurface soil gas concentrations and pressures of methane at the Project Site to determine site-specific methane mitigation requirements prescribed by the City's Department of Building and Safety (Division 71 of the Los Angeles Building Code).

Mitigation Measures Incorporated from, or Consistent with, Mitigation Measures in the RTP/SCS EIR:

MM-HAZ-1 Soil Management Plan

- Due to the historic UST removed from 1022 S. Hill Street, when mass excavation/grading is to be conducted at this portion of the Project Site, proper soil management protocols pursuant to SCAQMD Rule 1166 would need to be followed in the event that petroleum hydrocarbon impacted soil is encountered and displaced.
- Construction and grading activities on-site shall implement Soil Management Protocols to the satisfaction of the Los Angeles Fire Department and the Department of Building and Safety if hydrocarbon impacted soil is found.

PROJECT-SPECIFIC IMPACTS

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of a high-rise mixed-use development with up to 700 residential dwelling units and 15,000 square feet of ground-floor commercial uses. During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. The use of these substances would comply with State Health Codes and Regulations.

Construction could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project

involved the creation of any health hazard or potential health hazard. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The Project Site is developed with an asphalt-paved surface parking lot on the southeast corner of Hill Street and Olympic Boulevard.

Methane

The Project Site is located within a City of Los Angeles Methane Zone. Although the Project Site is located in a City-designated Methane Zone, oil and gas wells or pipelines were not identified on the Project Site during the visual inspection by AEC. No aboveground storage tanks (AST), or indication of the present existence of underground storage tanks (UST) were detected at the Project Site. In accordance with the City's building code requirements, the Project Applicant was required to submit a Form 1- Certificate of Compliance for Methane Test Data. Methane Specialists tested the methane concentrations on the Project Site and prepared a Methane Report, dated April 21, 2017. Methane Specialists conducted shallow soil gas tests and installed multiple-depth gas probe sets where the highest concentrations of soil gases are expected to be found. The results found detectable levels of methane encountered while testing at the Project Site. The Project Site falls under Design Level III, with less than 2 inches of water-column gas-pressure. Therefore, as per Methane Code Table 1A, the Proposed Project required both passive and active methane mitigation systems. The Proposed Project would be required to implement design features and mitigation measures required by the Department of Building and Safety for a Level III site to ensure that impacts related to methane would be less than significant.

Site Reconnaissance

The objective of the site reconnaissance was to obtain information indicating the likelihood of RECs in connection with the Project Site. The reconnaissance was conducted by AEC staff on April 5, 2017. AEC identified no significant environmental concerns that would represent RECs observed at the Project Site during the site reconnaissance.

Previous Reports

During the completion of a previous report, Phase I Environmental Site Assessment, 1023 Broadway & 1022 S Hill Street, Los Angeles California, prepared by AEC, and dated April 13, 2016, it was noted that a 1,000-gallon heating oil UST was removed from the 1022 S Hill Street portion of the Project Site. Subsequent site assessments noted the presence of petroleum-impacted soil beneath the former UST. However, the City of Los Angeles Fire Department (LAFD) concluded that the residual petroleum hydrocarbon impacts did not warrant further action, and a no further action letter was issued in September

1990. AEC noted that because the planned development at the Project Site at the time did not require significant excavation or grading at the 1022 S Hill Street portion of the Site, such residual soil impacts were considered to be a historical recognized environmental condition that did not require additional assessment. As recommended in Mitigation Measure HAZ-1, when mass excavation/grading is to be conducted at this portion of the Project Site, proper soil management protocols would need to be followed in the event that petroleum hydrocarbon impacted soil is encountered and displaced. The assessment revealed no other evidence of RECs in connection with the Project Site.

Records Review

1022 S. Hill Street was listed on the UST database with no details provided. As previously discussed above, a UST was reportedly removed from this portion of the Project Site in 1990. There were no other listings for the Project Site on any of the standard regulatory databases searched by EDR. Several listings were mapped in the standard regulatory databases within ¼-mile of the Project Site (two SEMS, 33 ENVIROSTOR, seven LUST, and four SLIC). According to AEC, these properties are not considered to be significant environmental concerns to the Project Site based on several factors including the nature of the regulatory database listings, distance of the off-site listed properties to the Project Site, orientation of the listed properties relative to the Project Site, interpreted direction of groundwater flow, and/or regulatory case status information for the various properties as described in the database.

With the incorporation of a Soil Management Plan (refer to Mitigation Measures HAZ-1) and incorporation of recommended engineering control measures, impacts relating to release of hazardous materials would be mitigated to a less than significant level.

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?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect may occur if the Project Site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The closest school to the Project Site is Los Angelitos Early Education Center, located at 400 W. 9th Street, approximately 0.15 miles north of the Project Site. No hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be present at the Project Site and use of these substances would comply with State Health Codes and Regulations. The anticipated local haul routes to and from the Project Site would utilize 9th Street, Hill Street, Olympic Boulevard, and 17th Street. Access to the Project Site from the 110 Freeway would utilize 9th Street, which is a one-way eastbound street to Hill Street. Traveling from the Project Site to the 110 Freeway, the haul route would utilize Olympic Boulevard westward to Georgia Street, and north on Georgia Street to the 110 Freeway northbound on-ramp. Traveling to or from the Project Site to the 10 Freeway, the haul route would utilize Hill Street and 17th Street. Therefore, the proposed haul route would not pass by the aforementioned school. Therefore, the Proposed Project would not create a significant hazard through hazardous emissions or the handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and a less than significant impact would occur.

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

Less Than Significant with Mitigation Incorporated. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

As stated previously, a Phase I ESA was prepared for the Proposed Project in April 2017 to acquire and review information regarding the history of activities on the Project Site. As described above, the Project Site is identified on the UST database with no details provided. The UST was reportedly removed from the Project Site in 1990. Residual soil impacts that are reportedly present in the subsurface in this area are considered to be a historical REC. The Phase I ESA determined that there are recognized environmental concerns associated with the Project Site. With compliance to mandatory state and federal regulatory compliance measures and incorporation mitigation measure HAZ-1, above, potential impacts would be reduced to less than significant levels.

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. A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest public airport to the Project Site is the Los Angeles International Airport (LAX), located approximately 12 miles southwest of the Project Site. However, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area. Therefore, no impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences. The Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.[25,26] Development of the Project Site

[25] *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

[26] *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. As discussed below under Transportation and Traffic, the Project would not create significant impacts at any of the study intersections during the morning and afternoon peak hours. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and no significant impacts would occur.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project Site is located in a highly urbanized area of Downtown Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[27] Therefore, no impacts from wildland fires are expected to occur.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impact associated with the Proposed Project would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. The closest related projects are located directly across from the Project Site on Olympic Boulevard (see related project Nos. 32 and 75) and potential impacts were evaluated as part of their separate CEQA review processes and were found to result in less than significant impacts associated with hazardous materials and potential for risk of upset. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

[27] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed March 2017.*

X. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	❑	❑	☒	❑
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	❑	❑	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:	❑	❑	☒	❑
i) Result in substantial erosion or siltation on- or off-site?	❑	❑	☒	❑
ii). Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	❑	❑	☒	❑
iii). 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? Or	❑	❑	☒	❑
iv). Impede or redirect flood flows?	❑	❑	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	❑	❑	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	❑	❑	☐	☒

Regulatory Compliance Measures

The following Regulatory Compliance Measures are required in conjunction with the Proposed Project.

- **Hydrology (National Pollutant Discharge Elimination System General Permit):** Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Proposed Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure

that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

- **Hydrology (Low Impact Development Plan):** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

- **Hydrology (Development Best Management Practices):** The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

- **Stormwater Pollution (Demolition, Grading, and Construction Activities):** Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.
  - Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
  - All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
  - Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
  - Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

- **Hydrology (Standard Urban Stormwater Mitigation Plan):** Prior to the issuance of a grading permit, the Project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

PROJECT-SPECIFIC IMPACTS

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for

the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include compliance with NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduces potential water quality impacts during the construction and operation of a project.

Construction Impacts

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

The SWPPP would incorporate the required implementation of Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Additionally, City of Los Angeles Ordinance No. 173,494 further sets procedures for stormwater pollution control for the planning and construction of development and redevelopment projects. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operational Impacts

The Project Site is currently developed with a surface parking lot. The Project Site is completely covered with impervious surfaces. Thus, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Existing storm drain lines serving the Project Site are located along Hill Street and Olympic Boulevard. Stormwater flows south along Hill Street and onto stormwater inlets on the corner of Hill Street and 11th Street. Stormwater along Olympic Boulevard flows eastbound and onto stormwater inlets on the corner of Olympic

Boulevard and Broadway.[28] These storm drain lines are owned and maintained by the City of Los Angeles. The Proposed Project would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures as set forth below that would regulate the amount and water quality of stormwater leaving the Project Site.

In November 2012, the Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CAS004001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater disc;and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was recently amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.[29]

The Proposed Project falls within the second tier of the LID Ordinance requirements, which state that development projects that involve five or more units intended for residential use and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project Site shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques must be designed so that no stormwater runoff leaving the Project Site for at least the volume of water produced by the Stormwater Quality Design Volume (SWQDv).

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[28] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, March 2017.*

[29] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

Development and redevelopment projects are required to prepare a LID Plan, which comply with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Project Site and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. For the remaining runoff that cannot feasibly be managed on-site, the Proposed Project would be required to implement off-site mitigation on public and/or private land within the same sub-watershed as defined by the MS4 Permit.[30] Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.[31]

In compliance with the LID Plan, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.[32]

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Proposed Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water

[30] *City of Los Angeles Ordinance No. 183,833, 2015.*

[31] *Ibid.*

[32] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As discussed in Question 9(a) the Project Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Groundwater was not encountered during exploration, conducted to a maximum depth of 125 feet below the existing grade. The historically highest groundwater level is at a depth of 110 feet below the ground surface.[33] The Proposed Project would excavate soils beneath the Project Site at approximately 80 feet below grade to allow for the construction of the proposed subterranean parking levels. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

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, or through the addition of impervious surfaces, in a manner, which would

i) result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. A project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project Site is located in a highly urbanized area of the City of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Project Site is 100 percent impervious. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns. Further, the Proposed Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

ii) 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. As stated above in response to Checklist Questions X(a) and (i), the Project Site is approximately 100 percent impervious under existing conditions and would remain 100 percent impervious under proposed conditions. Surface water runoff under proposed conditions would comply with

[33] *Geocon West, Inc., Geotechnical Investigation, Proposed High-Rise Development "Olympic and Hill" 1000-1034 Hill Street and 220 & 226 West Olympic Boulevard, Los Angeles, California, February 28, 2017. (See Appendix C of this SCEA).*

the City's LID Ordinance (Ordinance No. 181,899). Compliance with the LID Ordinance would ensure the site is developed with BMPs designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater). As such, the volume of post-development surface water runoff would be reduced with the Proposed Project as compared to the existing conditions. Therefore, the Proposed Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site and impacts associated with the potential for off-site flooding would be less than significant.

iii) 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increases the probability that polluted runoff would reach the storm drain system.

Currently, the Project Site is completely developed with impervious surfaces and 100 percent of surface water runoff is directed to adjacent street storm drains. Existing storm drain lines serving the Project Site are located along Hill Street and Olympic Boulevard. Stormwater flows south along Hill Street and onto stormwater inlets on the corner of Hill Street and 11th Street. Stormwater along Olympic Boulevard flows eastbound and onto stormwater inlets on the corner of Olympic Boulevard and Broadway.[34] These storm drain lines are owned and maintained by the City of Los Angeles. Pursuant to local practice and City policy, stormwater retention or treatment BMPs would be required as part of the LID requirements. Any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance standards and retain or treat the first ¾ –inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), which would reduce the Proposed Project's impact to the stormwater infrastructure. Additionally, any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Furthermore, as stated above, implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality.

The Proposed Project would comply with LAMC Chapter VI, Article 4.4 and all applicable laws and regulations pertaining to stormwater runoff and water quality would ensure impacts are less than significant.

[34] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, March 2017.*

Therefore, the Proposed Project would not create or contribute to runoff water, which would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Potential impacts to surface water quality would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Project Site is not located in a coastal area. Therefore, the potential for tsunamis to adversely impact the Project Site is considered low. Additionally, no major water-retaining structures are located immediately up gradient from the Project Site. Therefore, flooding resulting from a seismically-induced seiche is considered unlikely. The development of the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Thus, no impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. As specified above, the Proposed Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control and would be required to obtain coverage under the NPDES General Construction Activity Permit. In addition, the Proposed Project would not adversely impact a groundwater management plan because the Proposed Project would be developed with Best Management practices to reduce surface water runoff and would not otherwise impede groundwater replenishment in the basin. As discussed above, the Proposed Project would comply with the City's NPDES General Construction Activity Permit during construction and designed in conformance with the City's LID Ordinance for new development. Therefore, neither construction nor operation of the Proposed Project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in a highly developed area within Downtown Los Angeles. As discussed above, the Project Site and the surrounding areas are served by the existing County storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Proposed Project and the related project sites, since Downtown Los Angeles is highly developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a cumulatively considerable contribution to impacting the

volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant.

XI. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	❑	❑	☐	☒
b. Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	❑	❑	☒	❑
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	❑	❑	❑	☒

Project Design Features:

The following Project Design features would be implemented as part of the Proposed Project.

- The Proposed Project includes a mix of uses, including residential dwelling units and retail/restaurant space that is consistent with the existing pattern of development in the vicinity.

In addition, the Proposed Project would implement Mitigation Measures MM-T-1 (Compliance with LADOT Requirements) and MM-T-3 (Construction Management Plan) in Section 16, Transportation and Traffic, to avoid or reduce potential effects related to the physical division of an established community during construction.

PROJECT-SPECIFIC IMPACTS

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if the project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located in an urbanized area of the Central City Community Plan Area (CPA) and would be consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The zoning designation for the Project Site is [Q]R5-4D-O (Multiple Dwelling Zone) and the General Plan land use designation for the Project Site is High Density Residential. Zones corresponding to the High Density Residential designation are the R5 zones. The [Q] Condition on the site includes various use limitations, but allows for residential uses that are permitted in the R5 Zone, as well as hotels, motels, and apartment hotels.

As discussed in Section II. Project Description, and shown in Figure II-3 and Figure II-5, the Project Site is surrounded by restaurant/retail, surface parking, office, and mixed-use residential properties. Properties to the north (north of Olympic Boulevard), south (east of Hill Street), and west of the Project Site are all zoned [Q]R5-4D-O with General Plan land use designations of High Density Residential. Properties located to the east of the Project Site (across from the alleyway, Blackstone Court) are generally zoned C2-4D-O-SN with General Plan land use designations of Regional Center Commercial. As such, no separations of uses or disruption of access between land use types would occur as a result of the Proposed Project. Accordingly, implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.

Furthermore, Mitigation Measures MM-T-1 and MM-T-3, which is a requirement under Section 16, Transportation and Traffic, would further reduce temporary construction impacts associated with physically dividing an established community during the construction period.

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

Less than Significant Impact. A significant impact may occur if the Proposed Project is inconsistent with the General Plan or zoning designations applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning designations are created to avoid or mitigate. The Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Project area. Namely, these plans and policy areas include the following: Central City Community Plan area, the City Center Redevelopment Project area, the Greater Downtown Housing Incentive Area, the Central City Parking Exception area, the Downtown Parking District, the Downtown Adaptive Reuse Incentive Area, the Downtown Streetcar Project area, and the Los Angeles State Enterprise Zone. The Project Site is also within a transit priority area pursuant to SB 743 and noted in the City of Los Angeles' Zoning Information File No. 2452.[35] These documents guide development at the Project Site.

[35] *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed March 2017.*

Regional Plans

SCAQMD Air Quality Management Plan

The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's most recent Air Quality Management Plan (AQMP) was updated in 2017 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. With approval of the TFAR, the Proposed Project conforms to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Furthermore, as noted in Section 3, Air Quality, the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Proposed Project. Therefore, the Proposed Project would be consistent with the AQMP.

SCAG's 2016 RTP/SCS

The Project Site is located within the six-county region that comprises the SCAG planning area. On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). The 2016 RTP/SCS includes the long-term vision of how the SCAG region would address regional transportation and land use challenges and opportunities. The Proposed Project would be consistent with the goals and policies set forth in the 2016 RTP/SCS, as the Proposed Project would redevelop a site that is currently developed with surface parking and would include the construction of a high-rise mixed-use development with multi-family residential and neighborhood-serving commercial uses. The Proposed Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Proposed Project would increase residential opportunities within a High Quality Transit Area (HQTA). Furthermore, the Proposed Project would add up to 700 residential units to the downtown area, generating approximately 1,176 residents.[36] The Proposed Project's estimated population growth would be consistent with SCAG's future growth projections for the City of Los Angeles.

Congestion Management Plan

The Congestion Management Plan (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. The Project Traffic Study was prepared in accordance with the County CMP and the City of Los Angeles Department of Transportation (LADOT) Guidelines. Project traffic impacts are analyzed in greater detail in Section 16, Transportation and Traffic.

[36] *See Checklist Question 13 a) Population and Housing.*

Local Plans

City of Los Angeles General Plan

The Proposed Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 community plans.

The elements that would be most applicable to the Proposed Project are the Housing Element, the Mobility Plan, and the Land Use Element. As shown in Table VI-10, the Proposed Project would promote the goals of the Housing Element and the Mobility Plan. Consistency with the Land Use Element/Central City Community Plan is further analyzed in Table VI-10. As shown in Table VI-10, the Proposed Project would promote the goals of the Housing Element and the Mobility Plan. The Proposed Project has been designed to comply with all applicable General Plan and zoning designations.

Table VI-10
City of Los Angeles General Plan Consistency Analysis

City of Los Angeles General Plan Goals	Project Consistency Analysis
Housing Element Goals	
a) A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.	**Consistent.** The Proposed Project would increase the housing stock in Downtown Los Angeles by providing safe, attractive, and centrally located studios, one-bedroom, two-bedroom, and penthouse residential dwelling units. The proposed residential units would be available to all persons without discrimination. Thus, the Proposed Project is contributing to the range of housing choices available in Downtown Los Angeles and is therefore consistent with this goal.
b) A City in which housing helps to create safe, livable and sustainable neighborhoods.	**Consistent.** The Proposed Project would redevelop a site that is currently occupied by a surface parking lot. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide. Compliance with regulatory compliance measures (relating to aesthetics and discussed in Section 1, Aesthetics) would further ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation. As such, the Proposed Project would prevent the spread of blight and deterioration by redeveloping an underutilized site. The Proposed Project is therefore consistent with this goal.

City of Los Angeles General Plan Goals	Project Consistency Analysis
c) A City where there are housing opportunities for all without discrimination.	**Consistent.** The Proposed Project would provide a variety of dwelling units of different sizes and configurations that would be available at market rate. The Proposed Project is increasing the housing choices available in Downtown Los Angeles. The Proposed Project's housing opportunities would be available to all persons, without discrimination. Therefore, the Proposed Project would be consistent with this goal.
Mobility Plan Key Goals	
(1) Safety First: Crashes, speed, protection, security, safety education, and enforcement.	**Consistent.** The Proposed Project would not include unusual or hazardous design features. The Project Site is generally pedestrian-oriented. Primary vehicular access for residential and commercial uses would be provided via full-access driveways along Hill Street and the adjacent alleyway, which would provide a connection to the subterranean garage and parking podium. The Proposed Project does not include any hazardous design features, which could impede emergency access. The Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles and to ensure pedestrian safety. Therefore, the Proposed Project would not substantially increase hazards due to design features, or incompatible uses, and would not hinder this goal.
(2) World Class Infrastructure: Design, Complete Streets Network (walking, bicycling, transit, vehicles, goods movement), Bridges, Highways, Smart Investments.	**Consistent.** This goal is directed toward City goals and is not specifically applicable to the Proposed Project. Nonetheless, the Project Site's location near mass transit, walking distance to services, retail stores, and employment opportunities, and the availability of bike parking located on the Project Site promotes a variety of transportation options. Thus, the Proposed Project would promote this goal.
(3) Access for All Angelenos: Affordability, vulnerable users, land use, operations, reliability, demand management, community connections.	**Consistent.** The Project Site is located in a highly urbanized area of Downtown Los Angeles within a TPA. The Proposed Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this goal.

City of Los Angeles General Plan Goals	Project Consistency Analysis
(4) Clean Environments and Healthy Communities Environment, public health, clean air, clean fuels and fleets.	**Consistent.** The Proposed Project is an infill development within a TPA and is within a major employment center. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking and the use of public transportation. As discussed further in Sections 3. Air Quality and 7. Greenhouse Gas Emissions, operational emissions and greenhouse gas emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD and therefore, the Proposed Project would be consistent with this goal.
Sources: City of Los Angeles General Plan Elements, Housing Element 2013-2021, Chapter 6, Housing Goals, Objectives, Policies and Programs; and City of Los Angeles General Plan Elements, Mobility Plan 2035. *Parker Environmental Consultants, 2017.*	

Mobility Plan 2035

The Mobility Plan 2035 ("Mobility Plan") of the City of Los Angeles General Plan, amendment adopted January 20, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. There are five goals of the Mobility Plan that define the City's high-level mobility priorities and include: safety first; world class infrastructure; access for all Angelenos; collaboration, communication and informed choices; and clean environments and healthy communities. The Mobility Plan contains several objectives pertinent to the Modified Project, which are identified as follows:

- Increase the number of adults and children who receive in-person active transportation safety education, in areas with the highest rates of collisions, by 10% annually;
- Ensure that 80% of street segments do not exceed targeted operating speeds by 2035;
- Ensure that 90% of households are have access within one mile to the Transit Enhanced Network by 2035;
- Ensure that 90% of all households have access within one-half mile to high quality bicycling facilities by 2035;
- Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

The Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian and vehicle infrastructure improvements. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035. The Mobility Plan 2035 identifies Hill Street and Hope Street as part of the Neighborhood Enhanced Network. Figueroa Street, Hope Street, Grand Avenue, Olive Street, and Main Street are part of the Tier 1 Bike Lane Network.

The Neighborhood Enhanced Network is the network of locally-serving streets planned to contain traffic calming measures that close the gaps between streets with bicycle facilities. Several streets in the study area are included within the planned Neighborhood Enhanced Network, including Hope Street, Hill Street, and 11th Street. The study area generally has a mature network of pedestrian facilities including sidewalks, crosswalks and pedestrian safety features. Approximately 8- to 18-foot sidewalks are provided throughout

the study area. With respect to the Mobility Plan's stated objectives, the Proposed Project would increase households within one mile to the Transit Enhanced Network, provide housing within one-half mile to high quality bicycling facilities, and increase the combined mode split of persons who travel by walking, bicycling or transit. As such, the Proposed Project would be consistent with the Mobility Plan.

General Plan Framework Element

The General Plan's Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element and the City's community plans discuss population, housing and employment to the year 2010. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units. The Citywide General Plan Framework and the Central City Community Plan provide growth projections and CPA capacity, respectively, for the year 2010. The General Plan Framework Element provides a 2010 projection of 27,029 persons, 16,457 households, and 61,500 additional jobs. The Central City Community Plan anticipated a population and dwelling unit capacity of 27,212 persons and 14,398 dwelling units, respectively. The Central City Community Plan recognizes that the Community Plan Area (CPA) may grow that population, jobs, and housing could grow more quickly, or slowly, than anticipated depending on economic trends.

The Proposed Project is in substantial conformity with the purposes, intent and provisions of the General Plan Framework Element, and the applicable Community Plan by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit, which is discussed in more detail in Table VI-11. below. More specifically, the Project is consistent with the Los Angeles General Plan Land Use Element, which consists of the 35 Community Plan Area plans, of which the property is in the City Center Community Plan. Consistency with the Community Plan is demonstrated below.

Table VI-11
Consistency Analysis with the Applicable Goals/Policies of the Framework Element

Goals and Policies	Consistency Assessment
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.	The Proposed Project would include a mixed-use of multi-family residential and ground-floor commercial uses that would front Hill Street and Olympic Boulevard. The Proposed Project would provide new opportunities for new businesses or the expansion or relocation of existing businesses; thus, increasing business opportunities Downtown. Additionally, the Proposed Project would foster new business and employment opportunities and potential customers, which helps improve the competitiveness of the Downtown commercial area. Thus, the Proposed Project would support this objective. Further, Compliance with regulatory compliance measures would ensure that the building maintains a safe, clean, attractive and lively environment during the Project's construction and operation.

Table VI-11
Consistency Analysis with the Applicable Goals/Policies of the Framework Element

Goals and Policies	Consistency Assessment
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	As discussed above, the Proposed Project would include a variety of uses including multi-family residential and ground-floor commercial which would provide new opportunities for new businesses or the expansion or relocation of existing businesses; thus, increasing business opportunities and economy of Downtown.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	The Proposed Project would provide ground-floor commercial space which would include restaurant and retail space that would serve the neighborhood and community. The Proposed Project would provide new opportunities for new businesses or the expansion or relocation of existing businesses; thus, increasing business opportunities Downtown.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	The Project Site is located in a Transit Priority Area as defined by CEQA. Additionally, the Proposed Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within ½ mile of two Metro stations and numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project encourages a variety of transportation options, such as walking and biking. Thus, this would reduce vehicles-per-miles traveled, promote alternatives to driving, and aim to improve air quality.
Policy 3.2.2: Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and carious densities of residential development within neighborhoods at appropriate locations.	The Proposed Project includes the development of a mixed-used building consisting of multi-family residential units and commercial space (consisting of restaurant and retail uses). The Proposed Project incorporates aspects of a compact development by providing the proposed development on a previously developed surface parking lot. The Proposed Project would provide ground-floor commercial space which would include restaurant and retail space that would serve the neighborhood and community.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use appropriate locations.	The Proposed Project would encourage improved access and mobility by providing both residential and commercial uses on a single site. The on-site commercial uses would provide employment and patronage opportunities within walking distance of on-site residents and the nearby multi-family residential developments. In addition, the Project Site is located within ½ mile of two Metro stations and numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation.
Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	Further discussed in Section 13, Population and Housing, the proposed Project's generation of 1,176 residents and 700 dwelling units would be within SCAG's 2016-2040 RTP/SCS Growth Forecast projections for the City of Los Angeles. Additionally, as discussed in Section 14, Public Services, and Section 18, Public Utilities, the Proposed Project would not create a significant negative impact that cannot be mitigated to

Table VI-11
Consistency Analysis with the Applicable Goals/Policies of the Framework Element

Goals and Policies	Consistency Assessment
	a less-than-significant level for all public services, utilities, and service systems, including schools. Therefore, the Proposed Project would support utility infrastructure and public services.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	As stated above, the Proposed Project includes the development of a mixed-use project, which would provide residents in close proximity to employment and patronage opportunities. Further, the Proposed Project is within walking distance of services, retail stores, and employment opportunities in the Downtown Los Angeles area. The commercial uses on-site would further support the pedestrian activity along Hill Street and Olympic Boulevard by providing ground-floor commercial uses that would front these major commercial corridors.
Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, and (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevard, referred to as districts, centers, and mixed-use boulevard, in accordance with the Framework Long-Range Land Use Diagram.	As stated above, the Proposed Project includes the development of a mixed-use project, which would provide residents in close proximity to employment and patronage opportunities. Further, the Proposed Project is within walking distance of services, retail stores, and employment opportunities in the Downtown Los Angeles area. The commercial uses on-site would further support the pedestrian activity along Hill Street and Olympic Boulevard by providing ground-floor commercial uses that would front these major commercial corridors, which is characterized by a mix of office, entertainment, retail, and residential uses.
Goal 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.	The Proposed Project would include multi-family residential units that would be available at market rate. Thus, the Proposed Project would be consistent with this goal.
Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the Standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.	The Proposed Project would redevelop a site that is currently occupied by a surface parking lot. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide. Compliance with regulatory compliance measures (relating to aesthetics and discussed in Section 1, Aesthetics) would further ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation.
Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles' neighborhoods.	The Proposed Project would promote a pedestrian-oriented environment by providing ground-floor commercial space that would front Hill Street and Olympic Boulevard. The building's design and ground-floor restaurant/retail would enhance pedestrian activity in the area, especially within the Downtown area. Additionally, the new residents would provide new foot traffic for surrounding business, conventions, trade shows, and tourism. Further, the Project's commercial uses would support visitors to Downtown.
Policy 3.8.4: Enhance pedestrian activity by the design and siting of structures in accordance with Chapter 5 Urban Form and Neighborhood Design policies of this Element and Pedestrian-Oriented District Policies.	As discussed above, the Proposed Project would promote a pedestrian-oriented environment by providing ground-floor commercial space that would front Hill Street and Olympic Boulevard. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide and under provision of City Staff.

Table VI-11
Consistency Analysis with the Applicable Goals/Policies of the Framework Element

Goals and Policies	Consistency Assessment
Goal 3F: Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	The Proposed Project would provide commercial uses, including restaurant and retail spaces that would provide future and existing residents with job opportunities, additional entertainment, and culture.
Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	The Proposed Project would provide commercial uses, including restaurant and retail spaces that would provide future and existing residents with job opportunities, additional entertainment, and culture. Additionally, the new residents would provide new foot traffic for surrounding business, conventions, trade shows, and tourism. Further, the Project's commercial uses would support visitors to Downtown. The Proposed Project would be compatible with the character of the surrounding districts and foster new business and employment opportunities and potential customers, which helps improve the competitiveness of the Downtown commercial area.
Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.	The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and penthouse units) and would be available at range of market rates. The Proposed Project would increase the housing choices available in Downtown Los Angeles. The additional units will increase supply and help reduce upward pressure on housing costs.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	The Proposed Project would provide multi-family residential units in a Transit Priority Area and in a highly urbanized area of Downtown Los Angeles. The Proposed Project would be within walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is in close proximity to many public transportation options, including bus and subway lines. Additionally, the Proposed Project would not encroach on any existing lower-density residential neighborhoods.
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	The Proposed Project's mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities. Additionally, the Project Site is located within ½ mile of two Metro stations and numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site is located in the highly urbanized Downtown Los Angeles area and is surrounded by a mix of retail, commercial, and entertainment services.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	As discussed above, the Proposed Project is an infill development in a Transit Priority Area (defined by CEQA) and is within a major employment center. The Proposed Project would place residential units and ground-floor commercial space in a transit-rich and pedestrian-oriented area. Additionally, the Project Site is located within numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site's location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation.

Table VI-11
Consistency Analysis with the Applicable Goals/Policies of the Framework Element

Goals and Policies	Consistency Assessment
Goal 7G: A range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.	The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and penthouse units) and would be available at range of market rates. The Proposed Project would increase the housing choices available in Downtown Los Angeles. The additional units will increase supply and help reduce upward pressure on housing costs. Additionally, the Proposed Project's mixed-use design would allow future residents the opportunity to work on-site. Further, the Proposed Project's close proximity to public transportation would allow residents to live and work in the City.
Source: City of Los Angeles, General Plan, Framework Element, December 11, 1996.	

Central City Community Plan

The Project Site is located within the South Park neighborhood sub-area of the Central City Community Plan Area (CPA). Therefore, all development activity on-site is subject to the land use policies of the Central City Community Plan (Community Plan). The Community Plan goals and objectives include providing organized growth, a Central City identity, and a full range of housing choices for employees and residents in the downtown area. As described in the Community Plan, the South Park district contains a mix of residential, medical, commercial, and retail uses. Warehouse space in one-story unreinforced masonry buildings is scattered throughout the district. South Park is recognized to be a mixed-use community with a significant concentration of housing.[37]

The Proposed Project would revitalize the area with the development of a 60-story mixed-use residential and commercial building. The Proposed Project would provide a maximum of 700 dwelling units (consisting of 140 studios, 352 one-bedroom plus den units, 177 two-bedroom units, 26 two-bedroom plus den units, 4 sub-penthouse units, and 1 penthouse unit) and 15,000 square feet of ground-floor commercial space with a total of 1,075 automobile parking spaces and 290 bicycle spaces. Of the proposed vehicle parking, 220 spaces would be provided for the adjacent office building to the immediate east under a contract parking agreement. The Proposed Project would provide a variety of on-site amenities, which would be located throughout the ground-floor lobby area, Level 5 landscaped deck and amenity area, and in private residential balconies. A detailed analysis of the consistency of the Proposed Project with the applicable objectives and policies of the Central City Community Plan for Residential and Commercial Land Uses is presented in Table VI-12, below.

[37] *City of Los Angeles Department of City Planning, Central City Community Plan, 2003.*

Table VI-12
Project Consistency with Applicable Objectives and Policies of the
Central City Community Plan Land Use Element for Residential and Commercial Land Uses

Objective / Policy	Project Consistency Analysis
Residential	
Objective 1-1: To promote development of residential units in South Park.	**Consistent.** The Proposed Project would include multi-family dwelling units in the South Park district of Downtown, Los Angeles. Thus, the Proposed Project supports this objective.
Policy 1-1.1: Maintain zoning standards that clearly promote housing and limit ancillary commercial to that which meets the needs of neighborhood residents or is compatible with residential uses.	**Consistent.** The Proposed Project aims to promote residential land uses in South Park. The Project Site is zoned [Q]R5-4D-O with a land use designation of High Density Residential. The Project would maintain and be developed in accordance with the current zoning and land use designation. The Proposed Project would add multiple family residential units and would include limited ancillary neighborhood commercial uses. Thus, the Proposed Project would be consistent with this policy.
Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.	**Consistent.** The Proposed Project would increase the housing stock in Downtown Los Angeles with safe, attractive, and centrally located studios, one-bedroom, two-bedroom, and penthouse apartments. The units would be available to existing Downtown employees and residents. Thus, the Proposed Project would contribute to the range of housing choices available to Downtown employees and residents.
Policy 1-2.1: Promote the development of neighborhood work/live housing.	**Consistent.** The Proposed Project would include multi-family dwelling units and ground floor restaurant/retail. The proposed ground-floor retail would generate the need for new employees. The proposed residential units are not live/work units; however, the Project Site is located near numerous employment opportunities in the Downtown Los Angeles area. Therefore, the Proposed Project would locate residential dwelling units near a major employment center allowing the future residents to live and work in the neighborhood. Therefore, the Proposed Project does not hinder the intent of this policy.
Objective 1-3: To foster residential development which can accommodate a full range of incomes.	**Consistent.** The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and penthouse units) and would be available at range of market rates. The Proposed Project would increase the housing choices available in Downtown Los Angeles. The additional units will increase supply and help reduce upward pressure on housing costs. n. Thus, the Proposed Project supports this objective.
Policy 1-3.1: Encourage a cluster neighborhood design comprised of housing and services.	**Consistent.** The Project Site is located in a Transit Priority Area and in a highly urbanized area of Downtown Los Angeles. The Proposed Project would be within walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is in close proximity to many public transportation options, including bus and subway lines. Thus, the Proposed Project supports the cluster neighborhood design concept of including residents near neighborhood facilities.
Commercial	

Objective 2-1: To improve Central City's competitiveness as a location for offices, business, retail, and industry.	**Consistent.** The Proposed Project includes ground-floor restaurant/retail uses that would front Hill Street and Olympic Boulevard. The Proposed Project would provide new opportunities for new businesses or the expansion or relocation of existing businesses; thus, increasing business opportunities Downtown. Additionally, the Project Site is within walking distance of the Broadway Theater and Commercial District and the Spring Street Financial District. Although the Project Site is not located within these districts, the Proposed Project would be compatible with the character of these districts and foster new business and employment opportunities and potential customers, which helps improve the competitiveness of the Downtown commercial area. Thus, the Proposed Project would support this objective.
Policy 2-1.2: To maintain a safe, clean, attractive, and lively environment.	**Consistent.** Compliance with regulatory compliance measures would ensure that the building maintains a safe, clean, attractive and lively environment during the Project's construction and operation. Thus, the Proposed Project would be consistent with this policy.
Objective 2-2: To retain the existing retail base in Central City.	**Consistent.** The Project Site is currently developed with a surface parking lot. Therefore, no retail uses currently exist on site. The Proposed Project would develop ground-floor restaurant/retail fronting Hill Street and Olympic Boulevard, which would provide new opportunities for new businesses or the expansion or relocation of existing businesses. Additionally, the Proposed Project would not adversely impact other retail stores in the vicinity of the Project Site. Instead, new residents would likely be new customers that would support nearby local businesses. Thus, the Proposed Project would support this objective.
Policy 2-2.1: Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force and businesses.	**Consistent.** The Proposed Project includes ground-floor commercial space fronting Hill Street and Olympic Boulevard. As such, the Proposed Project provides new space and opportunities that can attract businesses Downtown. Therefore, the Proposed Project would be consistent with this policy.
Policy 2-2.2: To encourage pedestrian-oriented and visitor serving uses during the evening hours especially along Grand Avenue cultural corridor between the Hollywood Freeway (US 101) and Fifth Street, the Figueroa Street corridor between the Santa Monica Freeway (I-10) and Fifth Street and Broadway between Third Street and Ninth Street.	**Consistent.** The Proposed Project would introduce new permanent residents and provide ground-floor restaurant/retail. The Project Site is in walking distance from many services, employment opportunities, and retail spaces (including the Broadway Theater and Commercial District and the Spring Street Financial District). Thus, the Proposed Project would encourage a pedestrian-oriented development that would support activities and uses into the evening hour. Although the Proposed Project is not located on Grand Avenue, Figueroa Street, Fifth Street or Broadway, the Proposed Project would support the intent of this policy.
Policy 2-2.3: Support the growth of neighborhoods with small, local retail services.	**Consistent.** The Proposed Project would include neighborhood serving ground-floor restaurant/retail spaces fronting Hill Street and Olympic Boulevard. Thus, the Proposed Project would add local retail services to support and the growth of the South Park neighborhood. Therefore, the Proposed Project would be consistent with this policy.
Objective 2-3: To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows,	**Consistent.** The Proposed Project would be consistent with the surrounding neighborhood by adding a mixed-use building to an area that is characterized by mixed-use

and tourism.	development. The building's design and ground-floor restaurant/retail would enhance pedestrian activity in the area, especially within the Downtown area. Additionally, the new residents would provide new foot traffic for surrounding business, conventions, trade shows, and tourism. Further, the Project's commercial uses would support visitors to Downtown. Thus, the Proposed Project would support this objective.
Objective 2-4: To encourage a mix of uses which creates an active, 24-hour downtown environment for current residents and which would also foster increased tourism.	**Consistent.** The proposed mixed-use development would contribute and support this objective by adding new residents and ground-floor restaurant/retail spaces. The Proposed Project would be designed to enhance pedestrian activity with the retail stores' main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. These features, among others, would contribute to an active, 24-hour downtown environment. Thus, the Proposed Project would be consistent with this objective.
Policy 2-4.1: Promote nightlife activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce existing pockets of activity.	**Consistent.** The Proposed Project includes ground-floor restaurant and retail spaces fronting Hill Street and Olympic Boulevard. The restaurant and retail uses would support nightlife activities. The Proposed Project would be designed to enhance pedestrian activity with the restaurants' and retail stores' main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. The Proposed Project would reinforce and add to the attraction of these pockets of activity by adding new residents to the area. Thus, the Proposed Project is consistent with this policy.
Objective 2-5: To increase specialty and ethnic markets in order to foster a diverse range of retail and commercial uses in Central City.	**Consistent.** The Proposed Project provides new ground-floor restaurant l/retail space, which would be available to specialty and ethnic stores. Thus, the Proposed Project would support this objective.
Source: City of Los Angeles, Central City Community Plan, Land Use and Planning Element. *Parker Environmental Consultants, 2017.*	

The Central City Community Plan addresses planning and land use issues and opportunities in various sectors, such as residential, industrial, commercial, transportation, among others. The Central City Community Plan projected a population of 27,029 persons and 16,457 dwelling units by 2010 within the Community Plan area.[38] The 2010 United States Census shows that the Central City Community Plan area had an actual population of 37,675 persons and 23,054 dwelling units in 2010.[39] The 2010 Census data shows that the actual population and housing units in the Central City Community Plan area in 2010 was higher than what was projected. Nevertheless, as discussed in Section 13. Population and Housing, the Proposed Project would be consistent with SCAG's population and housing growth projections.

The Proposed Project would be consistent with the goals, objectives, and policies set forth in the Central City Community Plan. Therefore, the Proposed Project is consistent with the applicable land use and planning policies in the Central City Community Plan.

[38] *City of Los Angeles Department of City Planning, Central City Community Plan, pg. II-3.*

[39] *City of Los Angeles Department of City Planning, 2015 Growth and Infrastructure Report, November 1, 2016.*

Redevelopment Plan for the City Center Redevelopment Project

Development on the Project Site is further defined by the Redevelopment Plan for the City Center Redevelopment Project ("Redevelopment Plan"). Due to State legislation, the CRA/LA has since been disbanded and there is a successor agency to the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). Development in the Redevelopment Project Area is governed by the Redevelopment Plan that was adopted in May 2002 by the CRA/LA and remains effective until May 2032. Specific design considerations from the Redevelopment Plan include: height, development densities, building setbacks, signage, open space and privacy, utilities, parking, and loading facilities. The Redevelopment Plan identifies overall objectives and development standards to guide the development, redevelopment, and rehabilitation of properties within the City Center area. The City Center area encompasses much of Historic Downtown, City Markets, and South Park. The Proposed Project is located within the Historic Downtown neighborhood of the City Center Redevelopment Project area, which was established by the CRA/LA. The Redevelopment Plan's objective for the Historic Downtown Development area is to achieve a mixed-use residential, commercial, office, cultural, recreation, entertainment and institutional area primarily through the adaptive re-use of the large stock of structures of architectural and historic merit.[40] Specifically, Section 508.1 calls for the following uses on private land: "Regional Center Commerce and Parking, including but not limited to service establishments, retail stores … high and medium density housing where compatible with existing and proposed development." The Proposed Project is compatible with other existing and approved high-density housing and mixed-use projects located within the downtown area. Table VI-13, below, provides a detailed analysis of the consistency of the Proposed Project with the applicable objectives of the Redevelopment Plan. If and until such time as the Successor Agency to the CRA/LA transfers land use functions to the City, the Successor Agency to the CRA/LA has jurisdiction over the implementation of the Redevelopment Plan.

The Project is also subject to Section 501 of the Redevelopment Plan (General Controls and Limitations), which requires that all structures comply with Federal, State, and Los Angeles City laws in effect, including the City building codes and ordinances. (Redevelopment Plan, p 16.) The Project's consistency with the objectives in the Redevelopment Plan is further analyzed in Table VI-13, below.

Table VI-13
Project Consistency with Applicable Objectives of the Redevelopment Plan

Objective	Project Consistency Analysis
• To eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the Project Area in accordance with this Plan.	**Consistent.** The Proposed Project would redevelop an underutilized site that is currently used for surface parking. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide. Compliance with all applicable building code requirements would further ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation. As such, the Proposed Project would prevent the spread of blight and deterioration by redeveloping an underutilized site in accordance with the Plan. The Proposed Project would be

[40] *City of Los Angeles, Community Redevelopment Agency, Redevelopment Plan for the City Center Redevelopment Project, 2002.*

	consistent with this objective.
• To further the development of Downtown as the major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, City-wide Plan portions, the Central City Community Plan, and the Downtown Strategic Plan.	**Consistent.** The Proposed Project would be designed and developed with the guidance of City Planning Staff and the applicable plans. Therefore, the Proposed Project would further the goals of the Los Angeles General Plan, Framework Element, the Central City Community Plan, and the Downtown Strategic Plan. Thus, the Proposed Project would be consistent with this objective.
• To create an environment that will prepare, and allow, the Central City to accept that share of regional growth and development which is appropriate, and which is economically and functionally attracted to it.	**Consistent.** The Proposed Project would replace an underutilized parking lot and introduce new multi-family dwelling units in the area, which would accommodate an increase of population and housing. Nevertheless, the Proposed Project housing and population generation is consistent with SCAG's growth projections for the City of Los Angeles Subarea. Additionally, the Proposed Project would be consistent with the City's goals of increasing housing in transit-rich areas near services, retail, and employment opportunities to reduce vehicles -miles traveled; increasing safe and healthy housing options downtown; and increasing the diversity of the housing stock. Therefore, the Proposed Project is consistent with Central City development goals and growth projections and would not hinder the implementation of this objective.
• To promote the development and rehabilitation of economic enterprises including retail, commercial, service, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area's tax base.	**Consistent.** The Proposed Project would provide ground-floor restaurant/retail fronting Hill Street and Olympic Boulevard, which would increase employment opportunities within Downtown and contribute to the Project Area's tax base. Thus, the Proposed Project would be consistent with this objective.
• To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.	**Consistent.** The Proposed Project would be consistent with this objective since it proposes the development of an underutilized site that is currently used as a surface parking lot. The Proposed Project would be designed with the guidance of applicable plans and design guidelines. Therefore, the Proposed Project would be consistent with this objective.
• To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.	**Consistent.** The Proposed Project would provide new residential units and ground-floor restaurant/retail spaces. Additionally, the Proposed Project would be designed to promote pedestrian activity with the restaurants' and retail stores' main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. The Proposed Project's location near mass transit and within walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. Thus, the Proposed Project would be consistent with this objective.
• To create a symbol of pride and identity which gives the Central City a strong image as the major center of the Los Angeles region.	**Consistent.** Development of the Project Site is guided by the Redevelopment Plan, Central City Community Plan and the Downtown Design Guide. The Proposed Project would be consistent with this objective and preserve and contribute to the area's symbol of pride and identity by introducing an iconic residential and commercial development that would be consistent with the Downtown Design Guidelines. Therefore, the Proposed Project furthers the goals of this objective.

• To facilitate the development of an integrated transportation system which will allow for the efficient movement of people and goods into, through, and out of the Central City.	**Consistent.** This objective is directed towards City goals and does not specifically pertain to the Proposed Project. The Proposed Project would place new housing and retail space in a highly walkable and transit-rich area. As such, residents and employees of the Proposed Project can easily move around the Central City area and greater Los Angeles region. Therefore, the Proposed Project furthers the goals of this objective.
• To achieve excellence in design, based on how the Central City is to be used by people, giving emphasis to parks, green spaces, streetscapes, street trees, and places designed for walking and sitting, and to develop an open space infrastructure that will aid in the creation of a cohesive social fabric.	**Consistent.** The Downtown Design Guide directs the design of the Proposed Project. As such, the Proposed Project would be consistent with the design and development goals of the Central City Community Plan area. As such, the Proposed Project would be attractively designed and landscaped. The Proposed Project would provide private and common open space to its residents, which would reduce the Proposed Project's demand on local parks and open space. By providing on-site open space and the payment of the park fee, the Proposed Project's impacts on local parks would be less than significant. With development of the Project and payment of the fee, the Proposed Project would be consistent with this objective.
• To develop and implement public art into the urban fabric, integrating art into both public and private developments.	**Consistent.** The commercial component of the Proposed Project is subject to LAMC Section 91.107.4.6, which imposes an arts development fee for new development. The fees paid pursuant to this Ordinance will be used to provide adequate cultural and artistic facilities, services and community amenities for the project. Thus, the Proposed Project would be consistent with this objective.
• To preserve key landmarks which highlight the history and unique character of the City, blending old and new in an aesthetic realization of change or growth with distinction, and facilitating the adaptive reuse of structures of architectural, historic or cultural merit.	**Consistent.** The Project Site is currently used as a surface parking lot, and no significant landmarks or structures exist on-site. As further discussed in the Section 5, Cultural Resources, the Proposed Project would have a less than significant impact on identified surrounding historic resources and would not negatively affect the physical integrity of any historical resource. All of the identified historical resources in the vicinity of the Project Site would remain listed or eligible for listing under the relevant landmark program. The ability of these historical resources to convey their significance would not be materially impaired by the Proposed Project. As such, the Proposed Project would not destroy or demolish key landmarks and historical or unique features of the City, which would of hindered the goals of this objective.
• To provide a full range of employment opportunities for persons of all income levels.	**Consistent.** The Proposed Project would be consistent with this objective, as it provides ground-floor restaurant/retail and would introduce new employment opportunities into the area.
• To provide high and medium density housing close to employment and available to all ethnic, social and economic groups, and to make an appropriate share of the City's low- and moderate-income housing available to residents of the area.	**Consistent.** The Proposed Project would locate high-density housing near many employment opportunities. Additionally, the ground-floor commercial element provides additional employment opportunities in the Downtown area. The Proposed Project's residential units and employment opportunities would be available to all ethnic, social, and economic groups without discrimination. As such, the Proposed Project would be consistent with this objective.
• To establish an atmosphere of cooperation among residents, workers, developers, business, special interest groups and public agencies in the implementation of this Plan.	**Consistent.** This objective is directed toward City goals and is not specifically applicable to the Proposed Project. The Proposed Project would be designed and developed with the guidance of the Department of City Planning, and other

	necessary City departments. Additionally, the Proposed Project would be designed in accordance with plans and design guidelines that have jurisdiction over the Project Site. As such, the Proposed Project would be consistent with this objective.

Notes:
1. "Plan" used within this table means the City Center Redevelopment Plan.
Source: City of Los Angeles, Redevelopment Plan For the City Center Redevelopment Project (Ordinance No. 174593), May 15, 2002.
Parker Environmental Consultants, 2017.

The Redevelopment Plan designates the Project Site as residential. The Redevelopment Plan establishes four criteria for commercial uses within residential areas, which includes mixed-use commercial and residential in a residential zone. These criteria are:

1. Promote community revitalization;
2. Promote the goals and objectives of the Plan;
3. Be compatible with and appropriate for the Residential uses in the vicinity;
4. Meet design and location criteria required by the Community Redevelopment Agency.

The Proposed Project would be consistent with the criteria for commercial uses in residential areas. The Proposed Project would revitalize an underutilized lot with the development of a high-rise mixed-use building with ground-floor commercial space and residential units. As demonstrated in Table VI-13, above, the Proposed Project would promote the goals and objectives of the Plan. The Proposed Project's land uses are consistent with the surrounding neighborhood that is characterized by existing and proposed mixed-use buildings. Additionally, the Proposed Project would be consistent with the Project Site's zoning ([Q]R5-4D-O) and General Plan land use designation (High Density Residential). As such, the Proposed Project would be compatible and appropriate for the commercial land uses located in the vicinity of the Project Site. Further, the Project would provide open space for the residents, which would comply with the LAMC requirements for open space. Thus, the Proposed Project would include amenities, which are appropriate to the size and type of housing proposed. The Redevelopment Plan refers to the Downtown Design Guide for guidance in building design. The proposed building would be designed with the guidance of this document (further discussed below).

Section 512.1 of the Redevelopment Plan allows for a maximum FAR of 6 to 1 in the Historic Downtown Development Area. However, Section 512.4 allows for this FAR to be exceed through TFAR. The Proposed Project requests a TFAR approval of more than 50,000 square feet for the total square footage of 643,021 square feet, which is allowed pursuant to the Redevelopment Plan §512.4 and LAMC Section 14.5. Based on the Redevelopment Plan §512.4, TFAR resulting in higher density development must be appropriate in terms of location and access to the circulation system. TFAR to parcels with reasonable proximity or direct access to a public or private rapid transit station is also particularly encouraged. The Proposed Project is well served by transit and is within walking distance of two nearby Metro Stations--the Pico/Flower Station and the 7th Street/Metro Center Station. Therefore, the Proposed Project would be consistent with the Redevelopment Plan's goal to promote higher density mixed-use development and its overall objectives (discussed in Table VI-13).

Downtown Design Guide: City of Los Angeles

As discussed earlier, the application of Public Resources Code Section 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." The Proposed Project is a mixed-use residential project on an infill site within a transit priority area. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. The City's Downtown Design Guide has been adopted by the City to guide its design review of projects as part of Site Plan Review. The Proposed Project's consistency with such design guidelines is discussed below.

The Downtown Design Guide: City of Los Angeles encourages Downtown Los Angeles to develop as a more sustainable and livable community. The focus of the Design Guide is on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. To achieve this harmony between buildings and public rights-of-way, the Design Guide provides design goals and specific requirements for the design of sidewalks and setbacks, ground floor treatment, parking and access, building massing and street wall, on-site open space, architectural detail, streetscape improvements, signage, public art, and promote civic and cultural life, which are discussed in further detail below. Additionally, the Downtown Design Guide identifies design principles for creating a livable downtown; these principles include:

a) *Employment Opportunities.* Maintain and enhance the concentration of jobs, in both the public and private sectors, that provides the foundation of a sustainable Downtown.
b) *Housing Choices.* Provide a range of housing types and price levels that offer a full range of choices, including home ownership, and bring people of diverse ages, ethnicities, household sizes and income into daily interaction.
c) *Transportation Choices.* Enable people to move around easily on foot, bicycle, transit, or auto. Accommodate cars but fewer than in the suburbs and allow people to live easily without one.
d) *Shops and Services Within Walking Distance.* Provide shops and services for everyday needs, including groceries, day care, cafes and restaurants, banks and drug stores, within an easy walk from home.
e) *Safe, Shared Streets.* Design Streets not just for vehicles, but as usable outdoor space for walking, bicycling and visual enjoyment.
f) *Gathering Places.* Provide places for people to socialize, including parks, sidewalks, courtyards and plazas, that are combined with shops and services. Program places for events and gatherings.
g) *Active Recreation Areas.* Provide adequate public recreational open space, including joint use open space, within walking distance of residents.
h) *A Rich Cultural Environment.* Integrate public art and contribute to the civic and cultural life of the City.

The Proposed Project would redevelop an underutilized site in an area largely characterized by commercial land uses. The Proposed Project includes the development of a mixed-use building that would contain residential units and ground-floor restaurant/retail. The Proposed Project would increase employment opportunities with its ground-floor commercial component. The Proposed Project would also be increasing the concentration of employment opportunities downtown and placing residents within walking distance of

many employment opportunities, shops, and services. The Proposed Project's location would reduce dependence on single-occupancy vehicles and promote walking and alternative transportation. The Proposed Project would directly increase housing choices in downtown Los Angeles. With approval of the discretionary requests, the Proposed Project would provide adequate open space and residential amenities. The Proposed Project may include but is not limited to, a pool deck, landscaped courtyard, rooftop terrace, residential lobby, lounge rooms and private balconies. Additionally, the Proposed Project would include plazas and commercial uses that would face toward the public right-of-way, which would promote a pedestrian environment, activate the sidewalk, and provide socializing opportunities. The Proposed Project would support the Downtown Design Guide's principles of on-site recreation opportunities and gathering places. The Proposed Project would directly support and promote the first seven principles of the Downtown Design Guide.

Project Site access and driveway design would be designed and developed in consultation with the Los Angeles Department of Transportation, Department of Building and Safety, and the Los Angeles Fire Department, as required. According to the Design Guide, the portion of Olympic Boulevard that borders the Project Site is identified as "Retail Street." Consistent with this designation, the Proposed Project would provide ground-floor commercial uses that would front Hill Street and Olympic Boulevard and would support a pedestrian-oriented environment, which would help support civic and cultural life. Ground-floor design and treatment (such as providing large storefront windows and beautifying the public right-of-way with street trees and landscaping) would promote pedestrian activity along Hill Street and Olympic Boulevard. The Proposed Project would be visually consistent and compatible with the surrounding buildings along Hill Street and Olympic Boulevard by providing a zero-foot setback along Hill Street, a 2-foot dedication along Blackstone Court, and a 21-foot dedication with an 8-foot sidewalk easement along Olympic Boulevard as a dedication to contain landscaping and street trees. The Project Site would be well designed and landscaped and would further enrich the community identity within Downtown Los Angeles. Additionally, primary vehicular access for residential and commercial uses would be provided via full-access driveways along Hill Street and the adjacent alley, which would provide a connection to the subterranean garage and parking podium. Parking for the Proposed Project would primarily be subterranean or contained in the inner portions from the above-grade parking podium and hidden from view. The Proposed Project's building siting, parking and access, architectural design, and materials would support the Downtown Design Guidelines. Thus, the Proposed Project would support the applicable principles and design criteria of the Downtown Design Guide.

Los Angeles Municipal Code

Zoning and General Plan Land Use Designations

The Project Site is located within the City of Los Angeles, which is subject to the requirements in the Los Angeles Municipal Code (LAMC). The Project Site consists of approximately 50,617 square feet (1.16 acres). The Project Site is currently improved with a surface parking lot. The Proposed Project includes the construction of a 60-story mixed-use apartment building with up to 700 apartments and 15,000 square feet of ground-floor restaurant/retail.

The Project Site is zoned [Q]R5-4D-O with a General Plan land use designation of High Density Residential, which allows for residential and restaurant/retail land uses. The Site is located within Subarea 2645 as defined in Ordinance No. 164,307. The [Q] condition reads as follows:

The property shall be limited to the following uses:

1. *Residential uses permitted in the R5 Zone.*
2. *Hotels, motels, and apartment hotels.*
3. *Any other use permitted in the C4 Zone, including commercial uses with a floor area ratio of up to 6:1, provided that the development plan is approved pursuant to the following procedure:*
    1. *The City Planning Commission shall have the authority to approve such development plan if it finds: (i) that the proposed development will be desirable to the public convenience or welfare, and (ii) that the proposed development will be in harmony with the objectives and intent of the Central City Community Plan, and (iii) that the City Planning Commission and the Community Redevelopment Agency Board have determined that the proposed development conforms to the Redevelopment Plan for the Central Business District, and (iv) that the proposed development will not have an adverse impact on existing or planned housing development in the vicinity, and (v) that the proposed development will not reduce the potential for future housing development on any other property planned for housing use in the Central City Community Plan, and (vi) that the proposed development will be in harmony with Grand Hope Park.*
    2. *The Commission may impose such conditions as it deems necessary with the objectives and intent of the Central City Community Plan and the Redevelopment Plan for the Central Business District.*
    3. *An application to permit such development, together with a complete set of development plans, shall be filed with the Community Redevelopment Agency and the City Planning Commission. The application with the Planning Commission shall be deemed complete when accompanied by determination by the Community Redevelopment Agency Board.* (pages 60-61 of Ordinance No. 164,307).

The "D" for the Project Site reads as follows:

The total floor area contained in all buildings on a lot shall not exceed six (6) times the buildable area of the lot, except for the following: (a) Projects approved under Section 418 (Transfer of Floor Area) of the Redevelopment Plan for the Central Business District Redevelopment Plan; (b) Projects approved under Section 415 (Rehabilitation and/or Remodeling of Existing Buildings) or Section 416 (Replacement of Existing Buildings) of said Redevelopment Plan; (c) Projects for which a density variation of 50,000 square feet or less is granted under Section 437 of said Redevelopment Plan; (d) Projects for which a density variation of more than 50,000 square feet was granted under Section 437 of said Redevelopment Plan prior to the effective date of this ordinance; (e) Projects approved pursuant to any procedure to regulate transfers of floor area as may be adopted by the City Council. The term "floor area" shall mean floor area as defined in Municipal Code Sections 12.21.1-A.5 and 12.21.1-B-4. (page 59 of Ordinance No. 164,307).

The corresponding zone for High Density Residential is a R5 zone. The Proposed Project would be comprised of multi-family residential uses and restaurant/retail uses. Commercial uses are permitted on lots zoned for R5 uses that are located within the Central City CPA and the City Center Redevelopment Project Area. With approval of discretionary requests, the Proposed Project would conform to the allowable land uses pursuant to the LAMC.

Height/Floor Area

Height District No. 4 does not specify a building height limit and would permit a maximum FAR of 13:1. However, the Project Site is subject to the Development "D" Limitations contained within Ordinance No. 164307, Subarea 2645. The D limitation restricts the maximum FAR to 6:1, unless the Project is approved additional floor area as referenced under *Zoning and General Plan Land Use Designation.* The Redevelopment Plan limits the total floor area of the Project Site to a ratio of 6:1 or approximately 303,702 square feet based on lot area. Per the Redevelopment Plan and the Transfer of Floor Area Rights (TFAR), development of the Project Site is allowed to a maximum FAR of 13:1, or approximately 658,021 square feet. The Proposed Project requests a TFAR approval of more than 50,000 square feet to allow for a total square footage of 658,021 square feet, which is permitted pursuant to the Redevelopment Plan §512 and LAMC Section 14.5. The addition of buildable floor area through the TFAR request would result in an FAR of 13:1. Thus, with approval of a TFAR request, the Proposed Project would be consistent with the allowable FAR.

Density

Per the Greater Downtown Housing Incentive Area, LAMC Section 12.22 C.3(c), the maximum number of dwelling units or guest rooms permitted shall not be limited by the lot area provisions of the LAMC so long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by the dwelling units. The Project Site would be developed with up to 700 residential dwelling units and no guest rooms. Thus, the Proposed Project is consistent with this requirement.

Open Space

As shown in Table II-3 in Section II, Project Description, the Proposed Project would be in compliance with the minimum open space requirements of the LAMC. The Proposed Project would include 85,550 square feet of open space. The total amount of open space required by code is approximately 86,976 square feet. As part of the open space requirements, the residential component of the Proposed Project includes planting trees at a rate of one tree for every four dwelling units, which requires 175 trees. The Proposed Project would also replace the seven street trees on a 2:1 ratio. A total of 184 trees are proposed on-site, which is consistent with LAMC requirements. Thus, the Proposed Project would be consistent with the open space requirements of the LAMC.

Parking

As discussed previously in this Section, the Proposed Project meets all of the requisite criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public Resources Code 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Accordingly, the Proposed Project's parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099.

Parking for the proposed retail and residential uses on-site will be provided in the seven levels of subterranean parking beneath the building and in levels one through four (above grade). The Project Site is located within the Central City Parking Exception area (LAMC Section 12.21 A 4 (p)), which permits one (1) space for each dwelling unit, except where there are more than six (6) dwelling units of more than three (3) habitable rooms per unit on any lot, the ratio of parking spaces required for all of such units shall be at least one and one-quarter (1¼) parking spaces for each dwelling unit of more than three (3) habitable rooms. The Project Site is also located in the Downtown Parking District, which establishes parking for certain non-residential uses. Pursuant to the Downtown Parking District, one (1) parking space is required per 1,000 square feet of commercial uses. As summarized in Table II-4, in the Project Description Chapter, the Proposed Project would be consistent with the applicable parking requirements of the LAMC. The Proposed Project would require a total of 1,075 parking spaces with 840 residential spaces and 15 commercial parking spaces. An additional 220 spaces is required for the adjacent office building located across the alleyway as part of a contract parking agreement. The Proposed Project plans to provide 1,075 parking spaces. Should the number of dwelling units or area of commercial space change prior to construction, the amount of vehicle and bicycle parking would change accordingly, in order to satisfy the requirements of the LAMC.

The Proposed Project would provide on-site bicycle parking and storage spaces for short-term and long-term bike storage. All short-term and long-term bike parking would be spread throughout the lower basements to the 5th floor near the service elevators and stairways. Pursuant to LAMC Section 12.21 A.16*(a)(1)(i)*, the Proposed Project is required to supply 32 short-term bicycle parking spaces and 258 long-term bicycle parking spaces, for a total of 290 bicycle parking spaces. The Project proposes to provide 290 spaces, consistent with the allocations for long-term and short-term spaces. Thus, the Proposed Project would be consistent with the LAMC requirements for vehicle and bicycle parking.

Downtown Adaptive Reuse Incentive Area

The purpose of the Adaptive Reuse Ordinance is to facilitate the conversion of older, economically distressed, or historically significant buildings to apartments, live/work units, or visitor-serving facilities. An adaptive reuse project is defined as any change of use to dwelling units, guest rooms, or joint living and working quarters in all or any portion of any eligible building. The Proposed Project would not rehabilitate any portion of the existing buildings on-site, and as such the Proposed Project is not an adaptive reuse project. No further discussion is required with regards to the Adaptive Reuse Ordinance.

Downtown Streetcar Project Area

The Project Site's parcels fronting Hill Street are located within the Downtown Streetcar Project area (ZI-2450). On November 22, 2016, the Planning and Land Use Committee directed the joint coordination between Department of City Planning (DCP) and Bureau of Engineering (BOE) relative to project applicants adjacent to the Downtown Streetcar Project. The proposed Streetcar Project consists of the construction and operation of streetcar service in downtown Los Angeles, along a 3.8 mile one-way loop. The alignment route would begin at 1st Street and Broadway and proceed south, turn west on 11th Street, north on Figueroa, and east on 7th Street, north of Hill Street, back to its beginning at 1st Street. Prior to the issuance of any building permit, the Project Applicant shall obtain clearance from the Bureau of

Engineering Streetcar Division, and all construction activity, utility installation and/or utility relocation in the public right-of-way shall not conflict with the Downtown Streetcar Project. With clearance and approval from the Bureau of Engineering Streetcar Division, the Proposed Project would have a less than significant impact to the Downtown Streetcar Project.

As discussed in the preceding paragraphs, the Proposed Project would not conflict with local and regional plans applicable to the Project Site. With approval of discretionary requests and adherence to appropriate regulatory compliance measures, any impacts would be less than significant.

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

No Impact. A project-related significant adverse impact could occur if the Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in Question 4(f) above, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in a highly urbanized area, and the Project Site is currently developed with a surface parking lot. Therefore, no impact would occur.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With regard to land use plans, regional and citywide projects under consideration would implement and support important local and regional planning goals and policies. Like the Proposed Project, each related project would be subject to a discretionary land use approval process, including CEQA review, and would incorporate any mitigation measures necessary to reduce potential land use impacts such that no significant impacts with regard to adopted land use plans would occur. Also, upon approval of the requested actions, development of the Proposed Project together with future forecasted growth would not be anticipated to conflict with the intent of the City General Plan, with other applicable land use plans, or with the LAMC regarding the future development of the Central City community. Therefore, development of the Proposed Project together with the related projects would not be expected to result in cumulatively considerable impacts with respect to applicable land use plans and regulations.

With regard to physical land use, it should be noted that all of the related projects are subject to local zoning and land use designations for each of the related project sites. These requirements would regulate future land uses and provide development standards for such land uses that would further preclude potential land use compatibility impacts.

As the Proposed Project would not combine with the related projects to substantially or adversely change the existing relationship with offsite communities and would not disrupt, divide, or isolate existing communities, the Project, combined with the related projects, would not result in cumulatively considerable physical land use impacts.

XII. MINERAL RESOURCES

Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	❑	❑	☒	❑
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	❑	❑	☒	❑

PROJECT-SPECIFIC IMPACTS

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Less Than Significant Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is zoned [Q]R5-4D-O, the "O" designation indicates the Project Site is located in an oil drilling district, specifically the Los Angeles Downtown Oil Field.[41] The Project Site is also located within a Mineral Resources Zone 2 (MRZ-2).[42] The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. The Project Site is currently developed with a surface parking lot. Development of the Project Site would not block or hinder access or availability of mineral resources. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource, and a less than significant impact would occur.

[41] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Oil field and oil drilling areas in the City of Los Angeles, September 1996.*

[42] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

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?

Less Than Significant Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. Although the Project Site is located within a MRZ-2 zone, the Project Site is not currently used for the extraction of mineral resources. Historic research also shows that the Project Site has not been historically used for the extraction of mineral resources. Development of the Project Site would not block or hinder access or availability of locally important mineral resources. Therefore, a less than significant impact to locally important mineral resources would occur.

CUMULATIVE IMPACTS

Less Than Significant Impact. As discussed above, the Proposed would have a less than significant impact on mineral resources. It is not known if any of the related projects would result in the loss of availability of known mineral resources. Each related project would be required to comply with the Los Angeles CEQA guidelines and execute required project site studies. Nevertheless, the Proposed Project would have no incremental contribution to the potential cumulative impact on mineral resources and would have a less than significant cumulative impact on mineral resources.

XIII. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?	❑	☒	☐	❑
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	❑	☒	☐	❑
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	❑	☒	☐	❑
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	❑	☒	☐	❑
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	❑	❑	❑	☒

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

Project Design Features:

The following Project Design features would be implemented as part of the Proposed Project.

- The Proposed Project would be constructed in accordance with Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

Regulatory Compliance Measures:

The following Regulatory Compliance Measures are required in conjunction with the Proposed Project.

- The Proposed Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Mitigation Measures Incorporated from, or Consistent with, Mitigation Measures in the RTP/SCS EIR:

Increased Noise Levels (Demolition, Grading, and Construction Activities)

MM-N-1 Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

MM-N-2 To the maximum extent possible, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

MM-N-3 The project contractor shall use power construction equipment with noise shielding and muffling devices.

MM-N-4 The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 5-dBA reduction in sound level.

MM-N-5 During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent residential land uses does not exceed 5 dBA over the ambient noise levels.

MM-N-6 An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

MM-N-7 Temporary Groundborne Vibration Impacts

- All new construction work shall be performed so as not to adversely affect the structural integrity of the adjacent buildings. Prior to commencement of construction, the applicant shall retain a qualified structural engineer to survey the existing foundations and structures of the adjacent buildings, and provide a plan to protect them from potential damage. The performance standards of the structure monitoring plan shall including the following:

  a) Documentation shall consist of video and/or photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings. A registered structural engineer shall develop recommendations for the adjacent structure monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect the adjacent structures from construction-related damage.

  b) The monitoring program shall survey for vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, or noticeable structural damage becomes evident to the project contractor, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to historic resources.

  c) In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant and, if warranted, in a manner that meets the Secretary of the Interior's Standards.

  d) The structure monitoring program and initial survey documentation shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the project prior to construction

MM N-8 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

L_{max} – The maximum instantaneous noise level experienced during a given period of time.

L_{min} – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments

adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.[43]

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[44]

[43] *City & County of San Francisco Superior Court, Mission Bay Alliance v. Office of Community Investment and Infrastructure, November 29, 2016.*

[44] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure VI-1, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential and educational uses as the most likely sensitive receptors to experience noise level increases during construction and at the major intersections surrounding the Project Site. The detailed noise monitoring data are presented in Appendix G, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table VI-14, Existing Ambient Daytime Noise Levels in Project Site Vicinity. As shown in Table VI-14, the ambient noise in the vicinity of the Project Site ranges from 67.4 to 73.2 L_{eq}. The maximum instantaneous noise level during the three 15-minute recordings was 90.3 dB L_{max} along the north side of Olympic Boulevard near the alleyway, where heavy vehicle traffic, buses, and delivery trucks passed by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels were pedestrians and vehicle traffic during the daytime hours, including cars, motorcycles, buses, and delivery trucks.

Table VI-14
Existing Ambient Daytime Noise Levels in Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Level Statistics[a]		
			L_{eq}	L_{min}	L_{max}
1	On the north side of Olympic Boulevard, across from the Project Site	Vehicle traffic, pedestrian activity, buses, and delivery trucks	73.2	54.8	90.3
2	On the northwest corner of Hill Street and Olympic Boulevard	Vehicle traffic, pedestrian activity, buses, and delivery trucks	70.6	61.0	86.8
3	On the west side of Hill Street across from the Project Site	Vehicle traffic, pedestrian activity, buses, and delivery trucks	67.4	55.9	79.7
4	On the east side of Broadway south of Olympic Boulevard	Vehicle traffic, buses, and trucks	71.0	61.5	88.2

[a] *Noise measurements at locations 1-3 were taken on Tuesday, March 28, 2017 at each location for a duration of 15 minutes. Location 4 was measured on June 20, 2017. See Appendix G of this SCEA for noise monitoring data sheets.*
Parker Environmental Consultants, 2017.

Sensitive Receptors

Several noise sensitive land uses are located in the vicinity of the Proposed Project. For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified:

- 940 S. Hill Street – existing commercial building, but proposed for mixed-use with residential development, located approximately 80 feet north of the Project Site;
- 955 S. Broadway – surface parking lot proposed for a mixed-use building with residential, located approximately 90 feet north of the Project Site;
- 939 S. Hill Street – Hanover South Park, a mixed-use building with residential, located approximately 150 feet northwest of the Project Site;

- 939 S. Broadway - Western Costume Building, a vacant building but proposed for adaptive re-use with residential units, located approximately 220 feet northeast of the Project Site;
- 1026 S. Broadway – Broadway Palace Apartments, mixed-use building with residential units, located approximately 250 feet east of the Project Site; and
- 927 S. Broadway – United Artists Theater Building (Ace Hotel), a mixed-use building with hotel, located approximately 330 feet northeast of the Project Site.

The locations of these land uses relative to the Project Site are depicted in Figure VI-1, Noise Monitoring and Sensitive Receptor Location Map. For purposes of assessing construction-generated vibration impacts, the Mayan Theater located immediately south of the Project Site is potentially susceptible to structural vibration impacts from the construction activities proposed for the Project, since the Mayan Theater is an identified historical structure.

PROJECT-SPECIFIC IMPACTS

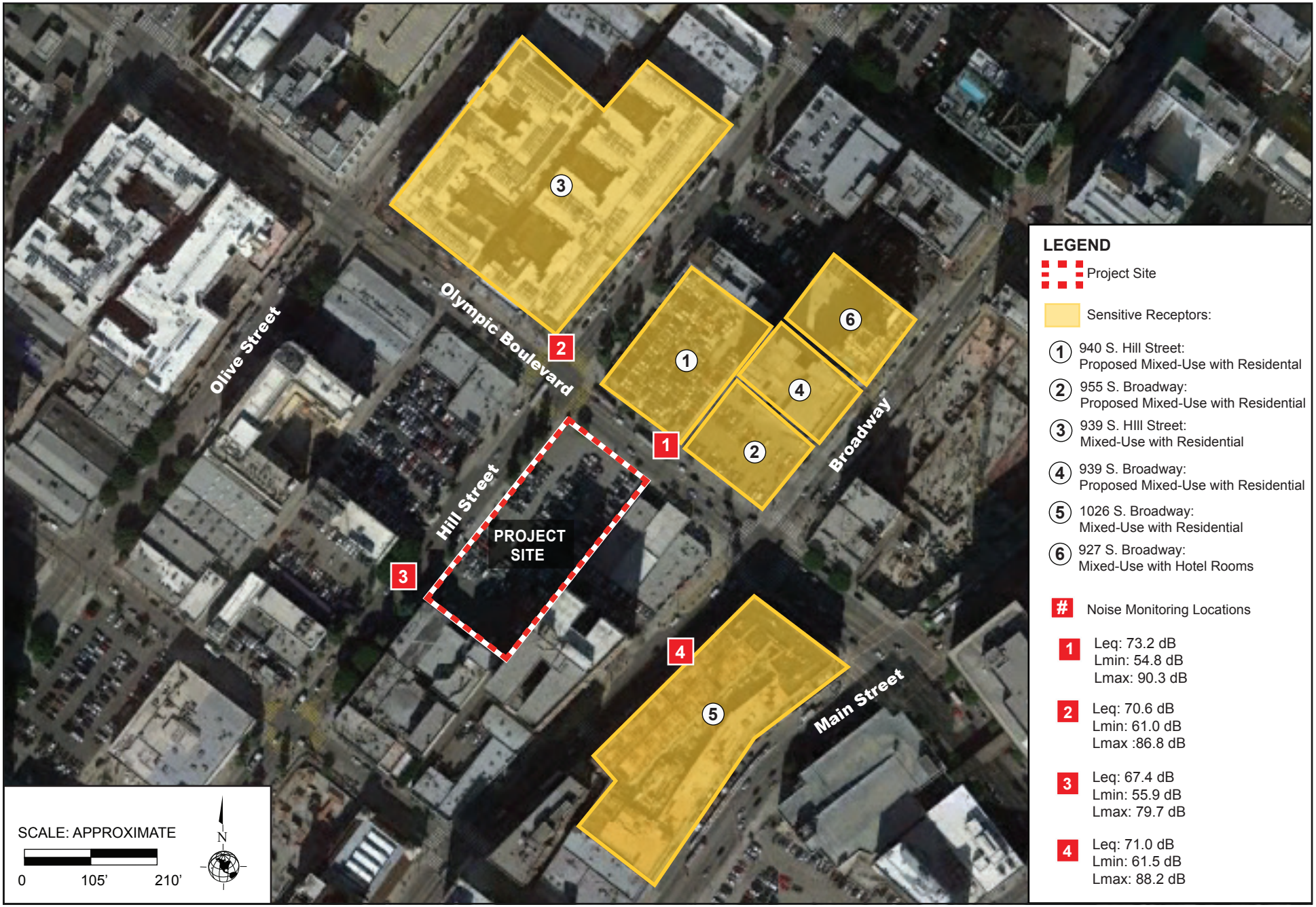
a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail, below.

Construction Noise

On-Site Construction Noise

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other feasible noise reduction device or techniques during the operation of the equipment. Additionally, as defined in the *L.A. CEQA Thresholds Guide* for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.



Source: Google Earth, Aerial View, 2016

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Figure VI-1
Noise Monitoring and Senstive Receptor Location Map

Construction of the Proposed Project would require the use of heavy equipment for site clearing, grading and site preparation, the installation of utilities, paving, and building construction. During each construction phase, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table VI-15, Typical Outdoor Construction Noise Levels, at a distance of 50 feet from the noise source (i.e., reference distance).

The noise levels shown in Table VI-15 represent expected noise levels typically associated with construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. Construction noise during the heavier initial periods of construction could therefore be expected to be 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity.[45] These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the Proposed Project would be expected to generate similar noise levels to those shown in Table VI-15, below during the approximate 30-month construction period.

Table VI-15
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.
Parker Environmental Consultants, 2017.

As set forth in the *L.A. CEQA Thresholds Guide*, a significant construction noise impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact. Since construction activities associated with the proposed development at the Project Site would last for more than ten days in a three-month period, a

[45] *Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the peak noise level over the entire duration).*

significant noise impact during construction would occur if the ambient exterior noise levels at the identified off-site and on-site sensitive receptors increase by 5 dBA or more.

Table VI-16, below, shows the estimated exterior construction noise levels at the six identified sensitive receptor locations. The Project's construction noise levels at sensitive receptors 4 through 6 would be under existing ambient noise levels, and thus would not be significantly impacted by the Proposed Project. Construction noise levels at sensitive receptors 1 through 3, however, would potentially be exposed to noise levels that exceed a 5 dBA increase over the ambient noise levels and thus could be significantly impacted.

Table VI-16
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

ID [a]	Address / Sensitive Land Use	Existing Exterior Ambient Noise (dBA L_{eq})	Construction Noise Levels Without Mitigtation (dBA L_{eq})	Construction Noise Levels With Mitigtation (dBA L_{eq})	Noise Level Increase with Mitigation (dBA L_{eq})
1	940 S. Hill Street Proposed mixed-use with residential	73.2	81.9	76.9	3.7
2	955 S. Broadway Proposed mixed-use with residential	73.2	80.9	75.9	2.7
3	939 S. Hill Street Mixed-use with residential	70.6	76.5	71.5	0.9
4	939 S. Broadway Proposed mixed-use with residential	73.2	73.2	68.1	0.0
5	1026 S. Broadway Mixed-use with residential	73.2	73.2	67.0	0.0
6	927 S. Broadway Mixed-use with hotel rooms	71.0	71.0	64.6	0.0

Notes
[a] *See Figure VI-1, Noise Monitoring and Sensitive Receptor Location Map.*
Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.
Parker Environmental Consultants, 2017.

Sensitive receptor locations 1 and 2 currently consist of a commercial retail/office land use and a surface parking lot, respectively. These properties, which are approved to be developed with residential land uses in the future, would only be impacted if they are occupied by residential land uses prior to construction of the Proposed Project.

Sensitive receptor location 3 is currently an occupied multi-family residential land use and as such, its residents would be exposed to daytime noise levels exceeding 5 dBA above ambient noise levels. As such, it is recommended that a temporary noise barrier be installed along the northerly property line fronting Olympic Boulevard to block the line-of-sight between the noise sources and the receptor. The construction of a ¾ inch plywood temporary noise barrier would be capable of attenuating the noise level by approximately 5 dBA, which would reduce construction noise impacts to below the threshold of significance. (see Mitigation Measure N-4, below). Furthermore, Mitigation Measure N-5 would ensure

temporary noise barriers are used during construction activities on floors located above the first level to ensure noise levels are appropriately attenuated so as not to exceed a 5 dBA increase at nearby residential land uses. A noise reduction of 5 dBA would be sufficient to reduce construction noise levels to below the thresholds of significance. As such, construction noise impacts would be less than significant after mitigation.

The Mayan Theater is located directly to the south of the Project Site. The Mayan Theater is a commercial nightclub use that is primarily in use after 6 p.m. on weekdays and on weekends. As such, construction noise from the Project Site would not interfere with the commercial use of the Mayan Theater. Additionally, the Mayan Theater is constructed with masonry walls on the north façade, which would provide more than 20 dBA of attenuation from outdoor to indoor noise levels. Thus, in the event any events are scheduled during the active periods of construction, the interior noise levels would not be impacted by exterior construction noise.

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Project Site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

As noted in Mitigation Measure N-1 through N-5, noise control efforts to limit the construction activities to permissible hours of construction, incorporate noise shielding devices and sound mufflers and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts. The Proposed Project's construction noise levels would occur on a temporary and intermittent basis during the construction period of the Proposed Project. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays or any federal holidays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. Mitigation Measure N-1 would further restrict the permissible hours of construction to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

Further, the Applicant would be required to post informational signage providing contact information to report complaints regarding excessive noise (refer to Mitigation Measure N-6, above). With implementation of Mitigation Measure N-6 and regulatory compliance measures, affected residents and business owners would be provided advanced notice of potential noise impacts and opportunities to comment on construction noise.

Off-Site Construction Noise

Construction of the Proposed Project would generate an increase in worker trips and heavy-duty truck traffic on local roadways for the export of soil and the delivery of materials during the construction process. Based

on the construction modeling assumptions provided in the CalEEMod air quality worksheets (see Appendix A to this SCEA), it is estimated that the Proposed Project would result in a maximum of 100 hauls (200 haul trips, one inbound and one outbound) during the grading phase and up to 790 worker and vendor trips per day during the peak construction activity. Worker and haul truck trips would generate short-term increases in noise levels on area roadways. Assuming haul trucks are distributed evenly over an eight-hour day, it is anticipated that the average hourly haul truck volume would be 26 trips within each hour (i.e., 13 inbound and 13 outbound). Based on the FHWA's Transportation Noise Model (TNM) Reference Energy Mean Emission Levels (REMLs), the increase of 26 haul trips would generate an equivalent noise level as approximately 393-496 automobiles.[46] Based on the existing traffic data provided in Appendix G (Noise Monitoring and Calculation Worksheets), the peak hour traffic volumes on Hill Street and Olympic Boulevard in the project vicinity range from 1,506 to 1,801 peak hour trips. Thus, the increase of 26 haul trips (i.e., 393-496 automobile equivalent trips) would represent an approximate 26-33 percent increase in equivalent traffic volume (1 hr L_{eq}). Similarly, the 790 worker and vendor trips generated under Phase 3 (building construction), would be well under the peak hour traffic volumes on the surrounding streets. As it would take a doubling of the existing traffic volume to generate a 3 dBA[47] increase in ambient noise levels, a 26-33 percent increase in traffic volume over a 1-hour L_{eq} event would generate a less than 3 dBA increase in noise and thus would result in a less than significant construction noise impact under the most stringent threshold.

Operational Noise

HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures, and vehicular access (loading/delivery trucks) in the alleyway. However, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Additionally, although loading and delivery trucks would access the site from the alley, the trucks would enter the enclosed parking garage for unloading and loading activities. As such, noise associated with these loading activities would be attenuated by the proposed parking structure. With compliance with regulatory measures, impacts would be less than significant.

Urban Noise Levels and Residential Land Uses

In order to ensure that on-site residences would not be adversely impacted by ambient urban noise levels, the Proposed Project would be constructed in accordance with Title 24 insulation standards of the California

[46] *Per Caltrans Technical Noise Supplement, 1 Heavy Duty Truck generates an equivalent noise level of 15.1 automobiles traveling 40 miles per hour, or 19.1 automobiles per truck traveling 35 miles per hour. (See Table 3-3 on page 3-19).*

[47] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, 2013 (at page 2-15).*

Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413. The Proposed Project would further comply with the California Green Building Code requirements for noise exposure. With compliance with regulatory measures, impacts associated with interior noise levels at the proposed residences would be less than significant.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Proposed Project could have an adverse impact on sensitive structures (i.e., building damage).

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not

construction. Consequently, as neither the City of Los Angeles nor the County of Los Angeles have an adopted significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are referenced to evaluate potential impacts related to project construction. This analysis uses the FTA adopted vibration standards for buildings. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table VI-17, below.

Table VI-17
Construction Vibration Damage Criteria

Threshold Criteria	PPV (in/sec)	Approximate RMS velocity in decibels (VdB) (re 1 micro-inch/second)
Building Category		
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90
Source: Federal Transit Administration, Office of Planning and Environment *Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Table 12-3) May 2006.*		

Table VI-18, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table VI-18, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table VI-18
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.										

Structural Vibration Impacts

In terms of construction vibration impacts on buildings, the Mayan Theater immediately adjacent to the southern portion of the Project Site, located at 1038 Hill Street and the buildings located at 214-216 W. Olympic Boulevard and 1023-1039 S. Broadway would be potentially susceptible to groundborne vibration

during the construction phase. The Mayan Theater building is located to the immediate south of the Project and would have an approximate 1-foot building setback from the proposed structure. Tieback and soldier piles would be employed during excavation to protect the buildings during excavation and foundation work. The buildings located at 214-216 W. Olympic Boulevard and 1023-1039 S. Broadway are located to the east of the Project Site, across the alley, and have an approximate 15-foot setback from the proposed structure. As shown in Table VI-19, Potential Construction Vibration Calculations, construction activities would have the potential to generate an approximate PPV of up to 0.156 PPV (in/sec) for the adjacent structures located east of the alley (214-216 W. Olympic Boulevard and 1023-1039 S. Broadway) and up to 3.070 PPV (in/sec) at the Mayan Theater building, which would exceed the threshold for potential for building damage. While this estimate is indicative that an impact may occur, vibration impacts can be reduced by controlled construction methods and careful selection and use of heavy equipment on-site. Accordingly, precautionary measures would need to be employed during the construction process to ensure building damage does not occur. Mitigation Measure N-7, listed above, is therefore recommended to ensure potential structural vibration impacts are mitigated to a less than significant level.

Table VI-19
Potential Construction Vibration Impact Calculations

Buildings	Equipment	Distance to Construction (feet)	PPV at 25 Feet (Inches/Second)	Maximum Vibration Levels during Construction (PPV in/sec)
Mayan Theater	Large bulldozer	1	0.089	3.070
	Caisson drilling	1	0.089	3.070
	Loaded trucks	1	0.076	2.621
	Small Bulldozer	1	0.003	0.103
214-216 W. Olympic Blvd.	Large bulldozer	15	0.089	0.156
	Caisson drilling	15	0.089	0.156
	Loaded trucks	15	0.076	0.133
	Small Bulldozer	15	0.003	0.005
1023-1039 S. Broadway	Large bulldozer	15	0.089	0.156
	Caisson drilling	15	0.089	0.156
	Loaded trucks	15	0.076	0.133
	Small Bulldozer	15	0.003	0.005

Source: Parker Environmental Consultants, See Appendix G to this SCEA for calculation worksheets.

Moreover, protection against damage to adjacent structures is provided by existing law. Both the California Civil Code and the Los Angeles Municipal Code ("LAMC") impose affirmative obligations on excavating landowners to protect against damage to adjacent structures. Civil Code Section 832 requires that excavating owners give notice of the excavation to owners of adjoining lands and buildings, use ordinary

care and skill and take reasonable precautions to sustain adjoining land. Civil Code Section 832 imposes additional obligations on owners excavating deeper than nine feet. LAMC Section 91.3307 requires that adjoining public and private property, including without limitation footings and foundations, be protected from damage during construction.

Operation

The Proposed Project is a mixed-use development and would not involve the use of stationary equipment that would result in high vibration levels. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) along Hill Street and Olympic Boulevard, the proposed land uses would not result in a substantial increase in the use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, the collection of refuse would occur within the enclosed parking structure which would effectively attenuate groundborne vibration and noise impacts. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

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

Less than Significant with Mitigation Incorporated. A significant impact may occur if the Proposed Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* for operational noise impacts, a project would normally have a significant impact on noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table VI-20, Community Noise Exposure (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase.

Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Table VI-20
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Operational Noise

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed residences at the Project Site. As discussed in Question 12(a) above, the design of this equipment would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels.

Based on estimated A-weighted noise ratings published for standard HVAC equipment,[48] noise levels from rooftop mounted HVAC equipment would be expected to range from 69 dBA Leq to 74 dBA Leq at the source. Based on the approximate distances to the nearby sensitive receptors, and an approximate -3 dBA attenuation factor for Code-required mechanical screening, the estimated noise levels at nearby sensitive receptors would range from 34.23 dBA Leq to 47.91 dBA Leq (see Table VI-18, below), which would be below the 5-dBA threshold for a significant impact to occur. Therefore, the rooftop HVAC noise levels from the Proposed Project would not exceed the ambient noise levels by more than 5 dBA and would therefore meet the noise ordinance. This impact would be less than significant.

5th Level Amenity Deck Noise

An amenity deck would be located on the 5th floor which would provide a pool deck, sports court, barbecue area, dog run, bocce courts, washroom and sauna, gaming areas, tables, fire pit areas, and dining areas. The intended use of the amenity deck and outdoor courtyards would be to have the residents and guests to lounge outside and utilize the available amenities. There is no objective criteria for analyzing unamplified human voices. The only applicable criteria the LAMC code provides is that the Proposed Project shall adhere to LAMC Section 116.01, which states that it shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. It is not expected that the intended use (i.e. only up to a few people having a conversation, relaxing or enjoying the outdoors) would violate the prohibition of "loud, unnecessary and unusual noise" criteria. It is anticipated that there would not be any amplified music or speakers on the amenity deck.

Based on the size of the courtyards and the type of amenities provided, it is anticipated that these areas could accommodate up to 200 people for casual outdoor gatherings and utilizing all portions of the amenities. For purposes of estimating noise from people congregating in the outdoor courtyards, reference noise levels of 65 dBA and 62 dBA (L_{eq} at a distance of 3.3 feet) for a male and a female speaking in a raised voice, respectively, were used to analyze noise from the use of the outdoor courtyard areas. Assuming 200 individuals occupy these spaces at one time and up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time, the noise levels from activities on the outdoor courtyards would be approximately 83.75 dBA Leq.[49] The amenity deck would be bounded by glass railings on all sides. As such, noise generated by crowd activity in the courtyards would be attenuated by the surrounding glass railings and the façade of the 55-story residential tower. Assuming an approximate 3-dBA attenuation is provided by the glass railings and 5 dBA absorption/attenuation for the tower and building facade, the noise levels for the surroundings sensitive receptors would reach a maximum of 68.67 dBA for the proposed residential building to the north, (see Table VI-21, below). As noise levels from the courtyard activities would not exceed the 5-dBA threshold at the sensitive receptors, outdoor activity noise levels would be less than significant. Therefore, noise impacts associated with operational activities from

[48] *Carrier Corporation, Product Data Sheet for 25HBC5 Base 15 Heat Pump with Puron Refrigerant (1 ½ to 5 Nominal Tons.*

[49] *Cyril M. Harris, Handbook of Acoustical Measurements and Noise Control, Third Edition, 1991.*

the outdoor courtyards would be less than significant.

Loading Dock/Trash Collection Noise

The loading entrance for refuse trucks to enter the Project Site would be located along Olympic Boulevard on the northeast corner of the Project Site. The Proposed Project includes an enclosed area within the parking structure for refuse and recycling collection that would block the line of site to surrounding sensitive receptors. Noise from loading and trash collection would be temporary and occur only a few times a week. Additionally, the noise levels would be isolated within the ground level parking structure, which would result in a less than significant noise impact to surrounding sensitive receptors.

Parking Noise

Current vehicular access to the surface parking lot is provided by two ingress/egress driveways: one along Hill Street and one along Olympic Boulevard. An additional entrance-only driveway is located along Hill Street. The Proposed Project would retain one ingress/egress driveway along Hill Street and would be adding a vehicle driveway along the adjacent alleyway to provide access to the subterranean parking areas of the Proposed Project. An additional valet drop-off area would be located at the alleyway on the northeast portion of the Project Site along Blackstone Court. Activities within the designated parking structure areas associated with the Proposed Project would have the potential to increase ambient noise levels in the area. Sources of noise within the parking areas would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels associated with the residential parking levels would be highest in the early morning and evening when the largest number of people would enter and exit the Project Site. In addition, operational-related noise generated by motor driven vehicles within the Project Site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA. The Department of City Planning recommends the driveway ramps be constructed of noise-attenuating materials such as concrete surfaces. With implementation of Mitigation Measure N-8, noise impacts associated with the Proposed Project's parking garage would ensure operational noise impacts are reduced to less than significant.

Composite Noise Levels

On-site noise sources associated with the Proposed Project would include mechanical HVAC equipment and outdoor amenity activities. Since loading and parking noise would be completely enclosed, noise levels from these areas would not significantly increase ambient noise levels. Composite noise levels were estimated to analyze the impact from the combination of all on-site noise sources from the Project Site to the surrounding sensitive receptors. Table VI-21, Estimated Operational Noise Levels and Composite Noise Levels, shows the noise levels from all on-site sources and estimates the total composite noise levels at the surrounding sensitive receptors from the Project Site. When analyzed together, the Proposed Project would have a maximum noise level of 74.52 dBA Leq for Sensitive Receptor No. 1, the proposed residential building to the north. This analysis is conservative since these noise levels represent the maximum

capacities in the amenity deck. Therefore, the Proposed Project would not increase ambient noise levels by 5 dB, and a less than significant impact would occur.

Table VI-21
Estimated Operational Noise Levels and Composite Noise Levels

SR ID [a]	Ambient Noise Level	5th Level Amenity Deck Noise Level	HVAC Equipment Noise Level	Composite Noise Level	Ambient + Composite Noise Level	Increase
1	73.20	68.67	47.91	68.71	74.52	**1.32**
2	73.20	67.65	47.90	67.70	74.28	**1.08**
3	70.60	63.21	47.78	63.33	71.35	**0.75**
4	73.20	54.88	39.83	55.01	73.27	**0.07**
5	73.20	53.77	42.46	54.08	73.25	**0.05**
6	71.00	51.36	34.23	51.44	71.05	**0.05**

Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006 and Caltrans' Technical Noise Supplement, September 2013. See Appendix G to this SCEA.
Parker Environmental Consultants, 2018.

Traffic Noise

The Proposed Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. According to the *L.A. CEQA Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the Proposed Project's mobile noise impacts can be assumed to be less than significant. According to the Proposed Project's Transportation Impact Study, the proposed development would result in a net increase of 3,392 net daily vehicle trips, including 242 AM peak hour trips and 285 PM peak hour trips. For purposes of analyzing the Proposed Project's traffic noise impacts, the roadway noise levels were modeled using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise was modeled under the Existing (2017) "No Project" conditions and "Existing Plus Project" conditions to determine the environmental baseline and Project impact, respectively for seven street segments in the Project vicinity. As shown in Table VI-22, the Proposed Project would increase local noise levels by a maximum of 0.4 dBA CNEL (on Hill Street between Olympic Boulevard and 11th Street) and thus would not exceed the 3-dBA CNEL threshold of significance at any of the study street segments. The remaining street intersections analyzed would all experience a 0.2 dBA CNEL increase or less.

Table VI-22
Proposed Project Noise Impacts at Study Intersections for Existing Conditions

Roadway Segment	Noise Levels in dBA CNEL			
	FHWA-RD-77-108 Modeled Noise Levels			Significant Impact
	Existing (2017) Without Project Traffic Volumes	Existing Plus Project Traffic Volumes	Increase	
1. Hill Street Between Olympic Blvd and 11th St	65.4	65.8	0.4	No
2. Hill Street Between 11th St. and 12th St.	65.2	65.4	0.2	No
3. Hill St. Between 9th St. and Olympic Blvd.	65.4	65.5	0.1	No
4. Olympic Blvd. Between Olive St. and Hill St.	66.1	66.2	0.1	No
5. Olympic Blvd. Between Hill St. and Broadway	65.9	66.1	0.2	No
6. 11th St. Between Olive St. and Hill St.	61.5	61.6	0.1	No
7. 11th St. Between Hill St. and Broadway	62.5	62.5	0.0	No

Note: A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table VI-20, Community Noise Exposure (CNEL)).
Calculation roadway noise levels data and results using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes are provided in Appendix G to this SCEA.
Traffic data: Fehr & Peers, Olympic and Hill Traffic Study, January 2018.

As noted in the Project Traffic Study, traffic conditions in the project vicinity are anticipated to change by time the project is fully constructed and occupied. As such, traffic noise was also modeled under "Future (2022) Without Project" and "Future (2022) with Project" to determine the projected baseline and Project impact during the buildout year. As shown in Table VI-23, the Proposed Project would not increase noise levels by more than 3 dBA for future conditions. Thus, as shown for existing conditions and projected future conditions, the Proposed Project's mobile noise impacts would not exceed the most stringent CNEL threshold of 3 dBA set forth in the *L.A. CEQA Thresholds Guide*, and the Proposed Project's mobile source noise impact would be less than significant.

Table VI-23
Proposed Project Noise Impacts at Study Intersections for Future Conditions

Roadway Segment	Noise Levels in dBA CNEL			
	FHWA-RD-77-108 Modeled Noise Levels			Significant Impact
	Future (2022) Without Project Traffic Volumes	Future (2022) With Project Traffic Volumes	Future Increase	
1. Hill Street Between Olympic Blvd & 11th St	66.6	67.0	0.4	No
2. Hill Street Between 11th St. and 12th St.	66.5	66.6	0.1	No
3. Hill St. Between 9th St. and Olympic Blvd.	66.9	67.1	0.2	No
4. Olympic Blvd. Between Olive St. and Hill St.	67.3	67.4	0.1	No
5. Olympic Blvd. Between Hill St. and Broadway	67.1	67.3	0.2	No
6. 11th St. Between Olive St. and Hill St.	62.1	62.2	0.1	No
7. 11th St. Between Hill St. and Broadway	63.1	63.3	0.2	No

Note: A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table VI-17, Community Noise Exposure (CNEL)).
Calculation roadway noise levels data and results using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes are provided in Appendix G to this SCEA.
Traffic data: Fehr & Peers, Olympic and Hill Traffic Study, January 2018.

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?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Proposed Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. In addition, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact. As discussed above, impacts would be reduced to less than significant levels for construction vibration and operational noise with the incorporation of mitigation measures. As such, the proposed project not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and noise impacts would be considered less than significant.

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

No Impact. A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. The closest airport is the Los Angeles International Airport (LAX), which is located approximately 12 miles southwest of the Project Site. The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

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. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. The closest private airstrip is the Bob Hope Airport, located in Burbank approximately 15 miles north of the Project Site. As no such facilities are located in the vicinity of the Project Site, no impact would occur.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects identified in Section II, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area and it is impossible to predict with any degree of certainty the occurrence of concurrent construction activities. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized and mitigated on a project-by-project basis. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced with feasible mitigation. As demonstrated above, Project construction noise impacts, with the implementation of Mitigation Measures N-1 and N-6, would result in less than significant impacts. As such, the Project's construction noise impact would not be cumulatively considerable. Additionally, because each related project would be required to comply with the City's noise ordinance, cumulative impacts associated with construction noise would be mitigated to less than significant levels.

For purposes of analyzing the Proposed Project's cumulative traffic noise impacts, the roadway noise levels were modeled using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise was modeled under the Future (2022) base year conditions without the Project and "Future Plus Project" conditions to determine the Project's incremental cumulative roadway noise impacts, respectively. As shown in Table VI-24, Cumulative Roadway Noise Impacts, the Proposed Project's

contribution to future cumulative noise levels would result in a maximum increase of 1.7 dBA CNEL (on Hill Street between 9th Street and Olympic Boulevard) and thus would not exceed the 3-dBA CNEL threshold of significance at any of the study street segments. The remaining street intersections analyzed would all experience an increase of 1.6 dBA CNEL increase or less. Thus, the Proposed Project's mobile noise impacts would not exceed the CNEL threshold of 3 dBA set forth in the *L.A. CEQA Thresholds Guide*, and the Proposed Project's cumulative mobile source noise impact would be less than significant.

Table VI-24
Cumulative Noise Impacts at Study Intersections

Roadway Segment	Noise Levels in dBA CNEL			
	FHWA-RD-77-108 Modeled Noise Levels			Significant Impact
	Existing (2017) Without Project Traffic Volumes	Future (2022) With Project Traffic Volumes	Cumulative Impact	
1. Hill Street Between Olympic Blvd & 11th St	65.4	67.0	1.6	No
2. Hill Street Between 11th St. and 12th St.	65.2	66.6	1.4	No
3. Hill St. Between 9th St. and Olympic Blvd.	65.4	67.1	1.7	No
4. Olympic Blvd. Between Olive St. and Hill St.	66.1	67.4	1.3	No
5. Olympic Blvd. Between Hill St. and Broadway	65.9	67.3	1.4	No
6. 11th St. Between Olive St. and Hill St.	61.5	62.2	0.7	No
7. 11th St. Between Hill St. and Broadway	62.5	63.3	0.8	No

Note: A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table VI-20, Community Noise Exposure (CNEL)).
Calculation roadway noise levels data and results using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes are provided in Appendix G to this SCEA.
Traffic data: Fehr & Peers, Olympic and Hill Traffic Study, January 2018.

XIV. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	❑	❑	☒	❑
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	❑	❑	❑	☒
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	❑	❑	❑	☒

PROJECT-SPECIFIC IMPACTS

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)?

Less Than Significant Impact. A significant impact may occur if the proposed project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

In October 2008, SCAG approved and adopted the "2008 Regional Comprehensive Plan for the SCAG Region – Helping Communities Achieve A Sustainable Future" (2008 RCP). The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality of life needs. The 2008 RCP is intended to serve as an advisory document for local agencies in the SCAG region. The following vision statement and guiding principles are based on the region's adopted Compass Growth Vision Principles for Sustaining a Livable Region. These statements further articulate how the RCP can promote and sustain the region's mobility, livability, and prosperity for future generations.

RCP Vision

To foster a Southern California region that addresses future needs while recognizing the interrelationship between economic prosperity, natural resource sustainability, and quality of life. Through measured performance and tangible outcomes, the RCP serves as both a voluntary action plan with short-term guidance and strategic, long-term initiatives that are guided by the following Guiding Principles for sustaining a livable region.

RCP Guiding Principles

1. *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

2. *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.

3. *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.

4. *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 7, 2016, SCAG's Regional Council adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

Based on the regional growth projections in the 2016 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons and approximately 1,325,500 residences in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to 4,609,400 persons (or a 20% increase since the year 2012) and approximately 1,690,300 residences (or a 28% increase since the year 2012). SCAG's population and housing projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2012 and 2040 are further summarized in Table VI-25, below.

On a policy level, the Proposed Project is consistent with the goals and strategies of the RCP and the Compass Growth Vision Strategy discussed above, as the Proposed Project would revitalize an underutilized, developed property in an existing commercial area. The Proposed Project is an infill development project within the Central City Community Plan Area within the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a

population increase to 4.6 million persons by 2040. As shown in Table VI-25, SCAG population and housing projections from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) in the City of Los Angeles and 3,816,000 additional persons (an approximate 21% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. The number of employment opportunities is anticipated to increase by 472,700 jobs (approximately 28%) in the City of Los Angeles between 2012 and 2040, and the SCAG Region is anticipated to increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

Table VI-25
SCAG Population and Housing Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	3,845,500	4,609,400	20%
Los Angeles County [b]	9,923,000	11,514,000	16%
SCAG Region [b]	18,322,000	22,138,000	21%
Households			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	1,325,500	1,690,300	28%
Los Angeles County [b]	3,257,000	3,946,000	21%
SCAG Region [b]	5,885,000	7,412,000	26%
Employment			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	1,696,400	2,169,100	28%
Los Angeles County [b]	4,246,000	5,226,000	23%
SCAG Region [b]	7,440,000	9,872,000	33%

Source: SCAG, adopted 2016 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.

Based on the community's current household demographics (e.g., an average of 1.68 persons per multi-family household for the Central City Community Plan area ("Central City CPA")), the construction of 700 additional residential dwelling units would result in an increase in approximately 1,176 net permanent residents in the City of Los Angeles.[50] Further, the Proposed Project includes approximately

[50] *The 2015 Growth & Infrastructure Report estimates that the Central City Community Plan area had approximately 30,440 housing units and approximately 51,025 persons in July 1, 2015. Based on this information, the Central City Community Plan area has an average person per housing unit ratio of 1.68. See City of Los Angeles, Department of City Planning, 2015 Growth and Infrastructure Report, 2016 (at p. 9 and 11).*

15,000 square feet of ground-floor restaurant/retail space. The Proposed Project would generate the need of approximately 72 employees.[51] The proposed increase in housing units and population would be consistent with SCAG's forecast of 364,800 additional households, approximately 763,900 persons, and 472,700 jobs in the City of Los Angeles between 2012 and 2040. As such, the Proposed Project would not cause growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment. Refer to Table VI-26, below.

Table VI-26
Estimated Proposed Project Residents and Housing Growth

Use	Total Housing Units	Total Residents
Apartments	700	1,176
TOTAL:	**700**	**1,176**

Source: Based on the City of Los Angeles, Department of City Planning, 2015 Growth and Infrastructure Report, 2016 (at p. 9 and 11), the Central City Community Plan area has an average person per housing unit ratio of 1.68. Parker Environmental Consultants, 2017.

As shown in Table VI-27, Proposed Project Employment Growth, the Proposed Project's restaurant/retail component would generate the need for approximately 72 new employees. When considering the existing uses on-site, the development of the Proposed Project would decrease the number of employees in the area. Thus, the resulting employment of the Proposed Project would within SCAG's employment growth forecast. The additional employees generated by the Proposed Project would contribute to a fraction of 1 percent of SCAG's employment growth forecast for the City of Los Angeles. The Proposed Project's commercial component may result in indirect population growth with new employees relocating to the City of Los Angeles. However, it can be assumed that most of the employees generated by the Proposed Project would already reside within the City of Los Angeles. The new 72 employees would be consistent with SCAG's growth projections for the Los Angeles region. Therefore, impacts related to indirect population growth in the area would be less than significant.

Table VI-27
Estimated Proposed Project Employment Growth

Use	Amount	Employment Generation Factor [a]	Number of Employees
Proposed Project			
Retail	7,000 sf	1 employee / 588 sf	12
Restaurant	8,000 sf	1 employee / 134 sf	60
		Net Total Employment:	**72**

Notes:
The employee generation factor for existing and future uses were taken from the United States Green Building Code, Building Area per Employee by Business Type, May 13, 2008.
Parker Environmental Consultants, 2017.

[51] *One employee would occupy approximately 588 square feet of retail space and one employee per 143 square feet of restaurant space. Source: United States Green Building Council, Building Area Per Employee by Business Type, May 13, 2008.*

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site is developed with a surface parking lot. No residential units exist on-site. As such, the Proposed Project would not displace any existing housing. Therefore, no impact would occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is developed with a surface parking lot. No residential units exist on-site. Therefore, development of the Proposed Project would not displace any residents, since none exist on-site. Therefore, no impact would occur.

CUMULATIVE IMPACTS

Less Than Significant Impact. The related projects would introduce additional residential related uses to the Project Site area. Any residential related projects would result in direct population growth in the Project Site area.

As discussed in Question 13(a), the Proposed Project would not exceed the growth projections of SCAG's 2016 RTP/SCS for the City of Los Angeles subregion. Because the Proposed Project would not displace any residents, and population growth potentially associated with the Proposed Project has already been anticipated per SCAG projections, the Proposed Project's population growth would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

With respect to population growth from permanent employment, jobs in restaurant/retail land uses typically do not generate substantial population growth within the region. As such, jobs are generally filled by residents that already reside within close proximity to those jobs. Further, residential neighborhoods would be supportive and complementary to the proposed commercial land uses. As such, the related projects would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.

XV. PUBLIC SERVICES

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Fire protection?	❑	❑	☒	❑
ii. Police protection?	❑	☒	☐	❑
iii. Schools?	❑	❑	☒	❑
iv. Parks?	❑	❑	☒	❑
v. Other public facilities?	❑	❑	☒	❑

Project Design Feature:

- The Proposed Project would include 86,976 square feet of open space, including a 5th level amenity deck with a pool, lounging area, outdoor landscaped terrace, and roof deck. These areas provide the opportunity for Project residents, neighbors, and patrons of the retail space to gather.

Regulatory Compliance Measure:

The following Regulatory Compliance Measures are required in conjunction with the Proposed Project.

- **Public Services (LAFD):** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:
  - Fire lanes, where required, shall be a minimum of 20 feet in width;
  - All structures must be within 300 feet of an approved fire hydrant; and
  - Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.
- Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.

- **Public Services (Schools):** Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant

has paid all applicable school facility development fees in accordance with California Government Code Section 65995.

- **Recreation (Increased Demand For Parks Or Recreational Facilities):** The Project Applicant would be required to pay all applicable fees pursuant to the Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505) or Quimby Fees, which would be used to provide additional park facilities in the Project area.

Mitigation Measures Incorporated from, or Consistent with, Mitigation Measures in the RTP/SCS EIR:

MM PS-1 Public Services (Police – Demolition/Construction Sites)

- Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

MM PS-2 Public Services (Police)

- The plans shall incorporate the design features (outlined in LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design") relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

The location of public services (including fire services, police protection services, parks, and libraries) in the Project vicinity and that service the Project Site are shown in Figure VI-2, below.

LEGEND

- (F) LAFD Station No. 10
- (P) Central Community Police Station
- (#) Schools
  1. 9th Street Elementary
  2. John H. Liechty Middle School
  3. Miguel Contreras Learning Complex
  4. Ramon C. Cortines School
  5. Belmont Senior High
  6. Edward R. Roybal Learning Center
- (#) Parks
  1. Grand Hope Park
  2. Pershing Square Park
  3. Spring Street
  4. 6th & Gladys Street Park
  5. City Hall Park Center
  6. Toberman Recreation Center
  7. Trinity Recreation Center
  8. Orthopeadic Hospital Playground
  9. Hope and Peace Park
  10. Grand Park
  11. Alvarado Terrace Park
  12. Vista Hermosa Park
  13. Saint James Park
  14. Pico Union Park
  15. Central Park Recreation Center/Pool
  16. Hoover Recreaton Center
  17. Los Angeles Plaza Park
  18. Unidad Park
  19. Echo Deep Pool
  20. Mac Arthur Park
  21. Patton Street Park
  22. Alpine Recreation Center
  23. Echo Park Recreation Center and Lake
  24. Lafayette Community Center
- (#) Library
  1. Little Tokyo Branch Library
  2. Central Library
  3. Pico Union Library
  4. Chinatown Branch Library

Source: Google Maps, 2017.

PARKER ENVIRONMENTAL CONSULTANTS

Figure VI-2
Public Services in the Project Site Vicinity

PROJECT-SPECIFIC IMPACTS

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

(i) Fire protection

Less Than Significant Impact. Construction of the Proposed Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed Project. The BMPs that would be implemented during construction of the Proposed Project would include: keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site and surrounding vicinity during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flagmen would be used to facilitate the traffic flow until construction is complete. Construction of the Proposed Project would result in a less than significant impact.

Operation

Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service that would result in a physical adverse impact upon the environment.

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between high density residential and commercial land uses and a LAFD fire station that houses an engine company or a truck company is 1.5 miles or two miles, respectively. If the distance is exceeded, all structures located in the applicable high density residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Proposed Project is located beyond the maximum response distance. Although the Proposed Project is within the adequate response distance, the Proposed

Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the building.

According to the LAFD, minimum fire flow requirement for the Proposed Project is 6,000 gallons per minute (gpm) from six adjacent hydrants flowing simultaneously. A Service Advisory Request/Fire Service Pressure Flow Report (SAR) was prepared for the Proposed Project by the Department of Water and Power (LADWP) and was approved on May 1, 2017. Based on the approval of the SAR, fire flow requirements would be considered adequate at the Project Site. Development of the Proposed Project would result in a less than significant impact to fire flow requirements.

The Proposed Project would include up to 700 dwelling units and up to 15,000 square feet of ground floor retail/restaurant and would generate approximately 1,176 new residents and 72 employees.[52] The Proposed Project would increase the utilization of the Project Site, which is currently used as a surface parking lot and would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 10, located at 1335 S. Olive Street, approximately 0.6 miles south of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 10 to the Project Site, fire protection response would be considered adequate. The Proposed Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the normal building permit process, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that that fire protection services are adequate within the proposed building and around the Project Site, and would result in a less than significant impact to fire protection services.

(ii) Police Protection

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment.

The Proposed Project would include up to 700 dwelling units and up to 15,000 square feet of ground floor retail/restaurant and would generate approximately 1,176 new residents and 72 employees. The Proposed Project would increase the utilization of the Project Site, which is currently used as surface parking and would potentially increase the demand for LAPD services. The Project Site is located in the Central Area division of the LAPD's Central Bureau. The Project Site is served by the Central Community Police Station, located at 251 E. 6th Street, which is approximately 0.8 miles northeast of the Project Site. Table VI-28, Central Area Police Station Crime Statistics, provides crime statistics for Central City area in the City of Los Angeles from 2014 to 2016.

[52] *A residential generation rate of 1.68 used. An employee rate of 588 square feet per employee used.*

Table VI-28
Central Area Police Station Crime Statistics

Crimes [a]	2016	2015	2014
Violent Crimes			
Homicide	11	11	6
Rape	122	129	94
Robbery	680	688	478
Aggravated Assault	889	952	555
Total Violent Crimes	**1702**	**1780**	**1133**
Property Crimes			
Burglary	312	350	244
Motor Vehicle Theft	397	427	248
BTFV	1091	912	755
Personal / Other Theft	2577	2566	2035
Total Property Crimes	**4377**	**4255**	**3282**
Total Part 1 Crimes	**6079**	**6035**	**4415**
Child / Spousal Abuse (Part I & II) [b]	622	545	484
Shots Fired	38	32	17
Shooting Victims	24	20	11

Notes:
[a] *Crime Statistics for the following years ending December 31.*
[b] *Part II Child/Spousal Abuse Simple Assaults not included in Part 1 Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.*
Source: LAPD, COMPSTAT Unit, Central City Area Profile, accessed March 2017.

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. The Proposed Project would incorporate temporary construction fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. With implementation of Mitigation Measure PS-1 below, Project impacts would be less than significant during the construction period.

The development of the Proposed Project would result in an increase of on-site residents, visitors, patrons, and employees to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning

hours. As such, the Project guests and employees would be able to monitor suspicious activity at the building entry points (refer to Mitigation Measure PS-2, above). With implementation of Mitigation Measure PS-2, the Proposed Project's impacts to LAPD Services would be less than significant.

(iii) Schools

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board District 2. The Project Site is currently served by one elementary school, one middle school, and four high schools. Table VI-29, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

Table VI-29
Resident Schools Serving the Project Site

School Name	Grades	Address
9th Street Elementary	K-5	835 Stanford Avenue
John H. Liechty Middle School	6-8	650 S. Union Avenue
Miguel Contreras Learning Complex School (includes: Academic Leadership Community, School of Business and Tourism, School of Social Justice, and School of Global Studies)	9-12	322 S. Lucas Avenue
Ramon C Cortines School of Visual & Performing Arts	9-12	450 N. Grand Avenue
Belmont Senior High School	9-12	1575 W. 2nd Street
Edward R. Roybal Learning Center	9-12	1200 W. Colton Street
Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed March 2017.		

As shown in Table VI-30, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 115 elementary students, 32 middle school students and 66 high school students, for a total of approximately 213 students. The Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of School Development Fee, the Proposed Project's potential impact upon public school services would be less than significant.

Table VI-30
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Proposed Project					
Multi-Family [a]	700 du	115	32	66	213
Commercial [b]	15,000 sf	0	0	0	0
NET Student Generation:		**115**	**32**	**66**	**213**

Notes:
sf = square feet; du = dwelling units
[a] *Student generation rates are as follows for retail/commercial uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet.*
[b] *Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit.*
Source: For bullet points (a) above: Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012.
-For bullet points (b) above: Los Angeles Unified School District, School Fee Justification Study, September 2002.

(iv) Parks

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. These standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities."

The Proposed Project is located within a highly urbanized area within the Central City Community Plan Area. As shown in Table VI-31, there are approximately 106.5 acres of parkland and public recreation facilities within a 2-mile radius of the Project Site. These facilities range from 0.33-acres (Unidad Park) to 29.86 acres (MacArthur Park). The Proposed Project would provide approximately 86,976 square feet (2.00 acres) of total common open space and amenities on-site available exclusively to serve Project residents and their guests. The Proposed Project includes a variety of on-site amenities including, but not limited to,

a 5th level amenity deck with a pool, lounging area, outdoor landscaped terrace, and roof deck, thereby achieving the required square feet of open space required by the LAMC. In addition, the Project Applicant would be required to pay all applicable fees pursuant to the Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505) or Quimby Fees, which would be used to provide additional park facilities in the Project area. With payment of the mandatory developer fees, the project's increased demands upon public parkland and recreation facilities would be reduced to less than significant levels.

(v) Other Public Facilities

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site.

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library and 72 regional branch libraries. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

- Central Library, located at 630 W. 5th Street, approximately 0.6 mile north of the Project Site;
- Little Tokyo Branch, located at 203 S. Los Angeles Street, approximately 1.0 mile northeast of the Project Site;
- Pico Union Branch, located at 1030 S. Alvarado Street, approximately 1.42 miles west of the Project Site;
- Chinatown Branch Library, located at 639 N. Hill Street, approximately 1.7 miles north of the Project Site.[53]

The Central Library is approximately 500,000 square feet and has approximately 6.3 million items. It serves approximately 7,000 people a day and maintains a staff of 150 employees. The Library budget ($150.7 million) is 2% of the total city budget ($6.7 billion).[54] In 2011, Measure L, the Public Library Funding Charter Amendment, was approved by over 63% of voters. Measure L provides funds to restore 6-day-a-week service at all 73 libraries, and eventually 7-day-a-week service at 9 libraries, purchase additional books, and increase access to the Library's collections, computers and programs including after-school/summer youth, student homework help, adult literacy and job search programs.[55] Currently, there are no plans to construct any new library facilities in the local area. The LAPL's Criteria for New Libraries (formerly Site Selection Guidelines) recommended sizes for libraries are 12,500 square feet

[53] *City of Los Angeles Public Library, Hours and Locations, website: http://www.lapl.org/branches, accessed September 2015.*

[54] *Los Angeles Public Library, Measure L Fact Sheet, http://www.lapl.org/sites/default/files/media/pdf/about/fact_sheet.pdf, accessed March 2017.*

[55] *Ibid.*

Table VI-31
Recreation and Park Facilities within the Project Area

Park Name	Park Size (acres)	Park Amenities	Approx. Distance to Project Site (miles)
Grand Hope Park	2.07	Clock tower, open space (lawns), and children's play area	0.19
Pershing Square Park	4.44	Ice skating rink (seasonal), stage, sunken amphitheater	0.61
Spring Street Park	0.56	Open space, benches, and children's play area	0.71
6th & Gladys Street Park	0.34	Open space and basketball court	0.92
City Hall Park Center	1.20	Open space and benches	1.16
Toberman Recreation Center	2.20	Auditorium, barbecue pits, baseball diamond (lighted), children's play area, community room, indoor gym, picnic tables	1.17
Trinity Recreation Center	2.06	Auditorium, basketball courts (lighted/outdoor), open space, children's play area.	1.24
Orthopeadic Hospital Playground	0.17	Children's playground	1.28
Hope and Peace Park	0.57	Basketball courts and benches	1.30
Grand Park	12.0	Open space, benches, and dog park	1.30
Alvarado Terrace Park	0.91	Children's play area and gazebo	1.34
Vista Hermosa Park	2.13	Children's play area, picnic tables, soccer field	1.40
Saint James Park	0.98	Children's play area, open space	1.42
Pico Union Park	0.75	Children's play area, picnic tables	1.48
Central Park Recreational Center and Pool	0.70	Basketball courts (lighted/indoor), children's play area, pool	1.51
Hoover Recreation Center	2.46	Basketball courts, children's play area, picnic tables, indoor gym, barbecue pits, kitchen, gym	1.52
Los Angeles Plaza Park (El Pueblo de Los Angeles Monument)	2.60	Open space, benches, museums, and Olvera Street	1.53
Unidad Park (Beverly Park)	0.33	Children's play area, benches	1.57
Echo Deep Pool	1.04	Year-round indoor pool which offers various programming	1.58
Mac Arthur Park	29.86	Lake, recreation center, open space, benches, children's play area, auditorium, picnic tables, walking paths, auditorium, class room, and paddle boats	1.58
Patton Street Park	0.42	Children's play area, outdoor fitness equipment, walking path, benches	1.68
Alpine Recreation Center	1.97	Auditorium, basketball courts (lighted/indoor/outdoor), children's play area, indoor gym, volleyball courts	1.84
Echo Park Recreation Center, and Lake	28.60	Children's play area, picnic tables, basketball courts, tennis courts, barbecue pits, pool, soccer field, boathouse, paddle boats	1.95
Lafayette Community Center	8.10	Children's play area, picnic tables, basketball courts, tennis courts, community room, soccer field, kitchen, stage, TV area	2.00
Total Parkland (Approximate):	**106.46**		

Sources: Park distances, size, and amenities were determined using:
(1) City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/; and
(2) Navigate LA, http://navigatela.lacity.org/navigatela/, accessed March 2017.

facilities for communities with less than a population of 45,000 and 14,500 square feet facilities for communities with a population of more than 45,000. At 500,000 square feet the Central Library far exceeds these criteria and currently meets the library demands of the surrounding community. Therefore, it would be able to meet the Proposed Project's demand for library services, and the Proposed Project's impacts upon library services would be less than significant.

The Project would generate approximately 1,176 residents and an increase of roughly 72 employees. Employees of commercial development do not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. The additional 1,176 residents represent a negligible amount of the current service population of the Little Tokyo Branch and would be accommodated in the future service population of the Central Library, which serves the entire City. Therefore, the impacts related to library facilities would be less than significant.

CUMULATIVE IMPACTS

(i) Fire protection

Less Than Significant Impact. The Proposed Project, in combination with the related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Similar to the Proposed Project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection would be less than significant.

(ii) Police protection

Less Than Significant Impact. The Proposed Project, in combination with the related projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the

Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site. No impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

(iii) Schools

Less Than Significant Impact. The Proposed Project, in combination with the related projects is expected to result in a cumulative increase in the demand for school services. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. As shown in Table VI-32, Estimated Cumulative Student Generation, the Proposed Project and related projects would cumulatively contribute approximately 4,150 elementary school students, 1,160 middle school students and 2,356 high school students, for a total of almost 7666 students. This would create an increased cumulative demand on local school districts. However, as noted in the Related Projects List in Table II-6 of the Project Description, Related Project No. 26, 60, 70, 86, and 104 propose to develop schools within the Project vicinity. The addition of these schools would reduce the demand of schools in the area. Furthermore, each of the new housing units would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Cumulative impacts on schools would be less than significant.

(iv) Parks

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects could result in an increase in permanent residents residing in the greater Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of all applicable fees pursuant to the City's Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable

Table VI-32
Estimated Cumulative Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Single-Family Attached [a]	8,141 du	431	118	247	796
Multi-Family Residences [b]	20,979 du	3,459	944	1,978	6381
Hotel [c]	2,614,525 sf	20	8	9	37
Industrial [d]	130,000 sf	2	1	1	4
Office [e]	3,640,273 sf	85	39	38	162
Retail [f]	2,541,517 sf	38	18	17	73
Related Projects Total:		**4,035**	**1,128**	**2,290**	**7,453**
Proposed Project Net Total:		115	32	66	213
Cumulative Total:		**4,150**	**1,160**	**2,356**	**7,666**

Notes: sf = square feet; du = dwelling units

[a] *Student generation rates are as follows for single-family attached residential uses: .053 elementary, .0145 middle and .0303 high school students per unit.*

[b] *Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit.*

[c] *Student generation rates are as follows for hotel uses: .0076 elementary, .0035 middle and .0034 high school students per 1,000 sf.*

[d] *Student generation rates are as follows for industrial uses: .018 elementary, .0083 middle and .008 high school students per 1,000 square feet.*

[e] *Student generation rates are as follows for office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 square feet.*

[f] *Student generation rates are as follows for retail/commercial uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet.*

Source:
-For bullet points (a) and (b) above: Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012.
-For bullet points (c) through (g) above: Los Angeles Unified School District, School Fee Justification Study, September 2002.
-Conversions for square feet per occupant are based on California Building Code (2013), Ch.10, Table 1004.1.2.

recreation fees on a project-by-project basis, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

(v) Other Public Facilities

Less Than Significant Impact. Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population, combined with the 580 additional residents generated by the Proposed Project, would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. The LAPL is committed to increase the

number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries.[56] Moreover, the Central Library far exceeds the LAPL criteria for its service area. Thus, the additional population generated by the Proposed Project and the related projects would not make a cumulatively considerable impact upon the City's library system.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	❑	❑	☒	❑
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	❑	❑	☒	❑

PROJECT-SPECIFIC IMPACTS

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. A significant impact may occur if the project would include substantial employment or population growth, which would 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.

It is reasonable to assume that the future occupants of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in Table VI-31, above, there are 24 existing new and recently improved parks within the Project Area totaling more than 106 acres that are available to serve the future residents and retail visitors to the Project Site. Notable new additions to the downtown area are Grand Park, at the Los Angeles Civic Center, and Spring Street Park, a pocket park recently developed at 426 S. Spring Street. In addition, the Proposed Project would provide approximately 86,976 square feet (2.00 acres) of open space and recreational facilities on-site that would be available exclusively to serve Project residents and their guests including, but not limited to, a 5th level amenity deck with a pool, lounging area, outdoor landscaped terrace, and roof deck. The availability of these on-site recreation amenities and

[56] *Los Angeles Public Library Strategic Plan 2015-2020, June 2015.*

opportunities would serve to reduce the demand for off-site park services, and accordingly the Proposed Project would not substantially 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. In addition, the Project Applicant would be required to pay Quimby Fees or, if applicable, fees in accordance with the Parks Dedication and Fee Update ordinance (Ordinance No. 184,505), which would be used to provide additional park facilities in the Project area. Therefore, the Proposed Project's impact upon parks and recreational facilities would be reduced to a less-than-significant level. Accordingly, the Proposed Project's impact upon parks and recreational facilities would be less than significant.

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?

Less Than Significant Impact. A significant impact may occur if a project includes or requires the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are 24 existing, new, or recently improved parks within the Project Area totaling more than 106 acres that are available to serve the future residents and retail visitors to the Project Site. The Proposed Project would also provide approximately 86,976 square feet of open space and recreational facilities on-site. As discussed in Section 14 (d) above, Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The Proposed Project itself does not include the expansion of park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant impact would occur.

CUMULATIVE IMPACTS

Less Than Significant Impact. The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and recently renovated park improvements have been made in the downtown area to accommodate cumulative demands created by increased residential development. Similar to the Proposed Project's requirement to pay fees to improve recreation and park facilities, the related projects that include residential units would be required to pay park mitigation fees or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.

XVII. TRANSPORTATION AND TRAFFIC[57]

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	❑	☒	❑	❑
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	❑	❑	☒	❑
c. Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	❑	❑	☒	❑
d. Result in inadequate emergency access?	❑	❑	☒	❑

The following section summarizes and incorporates by reference the information provided in the Transportation Impact Analysis prepared by Fehr & Peers, dated January 2018. The Traffic Study, the Traffic Memo, and related correspondence from the Los Angeles Department of Transportation (DOT) are provided as Appendix H to this SCEA.

Project Design Features:

- As an infill mixed-use development in an urban area, the Proposed Project is expected to have a higher percentage of internal and pass-by trips. Furthermore, because of its proximity to public transit, employment and entertainment destinations, a number of Project trips would be expected to be walk or transit trips rather than auto vehicle trips. Similarly, because the commercial components of the Proposed Project will be primarily locally serving to the Project and the surrounding area, some of the trips might be expected to be walk-ins either from the Project or the surrounding area.

- The Proposed Project would include 290 on-site bicycle parking spaces, which is pursuant to the standards and requirements of the City's Bicycle Ordinance (185480, effective May 9, 2018). The

[57] *Until the City has adopted new Transportation thresholds (or July 1, 2020, whichever is sooner), this section will use the 2018 Appendix G questions for question a.*

residential units would be provided 274 bicycle parking spaces, and the commercial/retail component would be provided 16 bicycle parking spaces. A bicycle maintenance area is provided.

Mitigation Measures Incorporated from, or Consistent with, Mitigation Measures in the RTP/SCS EIR:

T-1: Compliance with LADOT Requirements

The Applicant shall implement the project requirements detailed in DOT's communication to the Planning Department (DOT Case No. CEN 17-45630 dated July 12, 2017, attached) and as listed below:

Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours to the extent possible.

Transportation Demand Management (TDM) Program

A final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to the following strategies:

The TDM program should include, but not be limited to the following strategies:

- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;
- Administrative support for the formation of carpools/vanpools;
- Design the project to ensure a bicycle, transit, and pedestrian friendly environment;
- Establish bike and walk to work promotions;
- Provide unbundled parking that separates the cost of obtaining assigned parking spaces from the cost of purchasing or renting residential units;
- Accommodate flexible/alternative work schedules and telecommuting programs;
- Coupled with the unbundled parking, provide on-site car share amenities for residents;
- Guaranteed ride home program;
- A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Coordinate with DOT to determine if the project location is eligible for a future Integrated Mobility Hub (which can include space for a bike share kiosk, and/or parking spaces on-site for car-share vehicles);
- Provide on-site transit routing and schedule information;
- Provide a program to discount transit passes for residents/employees possibly through negotiated bulk purchasing of passes with transit providers;

- Provide rideshare matching services;
- Preferential rideshare loading/unloading or parking location;
- Contribute a one-time fixed fee contribution of **$50,000** to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the vicinity of the project.

Highway Dedication and Street Widening Requirements

The applicant should check with Bureau of Engineering's Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project.

Parking Requirements

The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for the project.

Driveway Access and Circulation

The traffic study indicates that two proposed driveways will provide access to the building's underground parking, including shared access for residents and retail and restaurant customers. The conceptual site plan for the project illustrated in Attachment 3 is acceptable to DOT. However, the review of this study does not constitute approval of the driveway dimensions, access and circulation scheme. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, @ 213-482-7024). In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts, for driveway width and internal circulation requirements. New driveways should be Case 2 - designed with a recommended width of 30 feet for two-way operations or 16 feet for one-way operations. Delivery truck loading and unloading should take place on site with no vehicles having to back into the project via the proposed project driveways on any adjacent street. However, the truck loading dock off of the alley (Blackstone Court) is acceptable.

Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009 and updated in 2014. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

T-2: Transportation Demand Management Plan and Monitoring Program

The Applicant shall prepare and submit a preliminary Transportation Demand Management (TDM) Plan to the Department of Transportation prior to the issuance of the first building permit for the Project. A final TDM Plan shall be submitted and approved by the Department of Transportation prior to the issuance of the first certificate of occupancy for the Project. The TDM Plan shall include strategies, as determined to

be appropriate by the Department of Transportation, that would have a minimum fifteen (15) percent effectiveness in reducing new vehicle trips.[58] TDM program elements should include, but not be limited to, the strategies listed in Mitigation Measure T-1 and the following:

- Site Design – The site will be designed to encourage walking, biking, and transit. Amenities would include:
  - New sidewalks and street trees along the perimeter
  - Improved street and pedestrian lighting.
- Unbundled Parking – Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of the purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making.
- Bicycle Parking – As described in Chapter 7, the Project will provide both long term and short-term bicycle parking. In addition, the Project could provide complementary amenities such as a self-service bike repair area.

T-3: Construction Management Plan

- The following will be implemented prior to construction:
  - As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
  - Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
  - Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.

PROJECT SPECIFIC-IMPACTS

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

Less Than Significant Impact with Mitigation Incorporated. The Transportation Study was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation ("LADOT") Transportation Impact Study Guidelines (December 2016). The analysis is also consistent with the guidelines in the Congestion Management Program (CMP) for Los

[58] *This assessment is based on a 15% reduction to the Proposed Project's trip generation as identified in the Traffic Impact Report. Should something other than apartment or condominium residential units be provided (e.g., short-term rentals, suites, etc.), the TDM percent effectiveness shall be adjusted accordingly to the satisfaction of DOT.*

Angeles County. The Transportation Study analyzed the following: Existing (2017) traffic volumes, Existing (2017) Plus Project traffic volumes, Future (2022) Without Project traffic volumes, and Future (2022) Plus Project traffic volumes. The analyses of future (2022) conditions included cumulative traffic attributable to ambient growth and related projects within the Project study area.

Study Intersections

Thirteen signalized intersections were selected for analysis in consultation with LADOT. The following 13 signalized intersections, illustrated in Figure VI-3, were identified in conjunction with LADOT to be analyzed as part of the scope of work for the Proposed Project:

1. Grand Avenue & Olympic Boulevard
2. Olive Street & 9th Street
3. Olive Street & Olympic Boulevard
4. Olive Street & 11th Street
5. Hill Street & 8th Street
6. Hill Street & 9th Street
7. Hill Street & Olympic Boulevard
8. Hill Street & 11th Street
9. Hill Street & 12th Street
10. Broadway & 9th Street
11. Broadway & Olympic Boulevard
12. Broadway & 11th Street
13. Main Street & Olympic Boulevard

Existing Conditions (2017)

Study Area

The Project Site is located within the Central City Community Plan area of the City of Los Angeles. The study area selected for analysis extends to include South Grand Avenue to the west, South Main Street to the east, West 8th Street to the north, and West 12th Street to the south. All of the streets in the study area are under the jurisdiction of the City of Los Angeles.

Existing Street System

Major arterials serving the study area include Olympic Boulevard in the east/west direction. Interstate 10 lies approximately 0.7 miles south of the Project Site, State Route 110 lies approximately 0.7 miles to the west of the Project Site, and US-101 lies approximately 1.5 miles northeast of the Project Site. Each of these interstates provides regional access to and from the study area.

The characteristics of the major roadways serving the study area are described in more detail in page 7 of the Transportation Study. The street descriptions include the designation of the roadway under the Mobility Plan 2035, An Element of the General Plan adopted by the Los Angeles City Council in January 2016.

Existing Public Transit Service

The Project Site is served by a high level of public transit. Figure 3A in the Transportation Study shows the various Metro bus routes, rapid bus routes, and Metro Rail lines providing service in the study area. Figure 3B shows the bus routes operated by other operators in the study area. The Project Site is located approximately one half-mile northeast of the Metro Pico Station and approximately 0.7 miles southeast of the 7th Street/Metro Center Station. Thirty-seven local, limited, express, rapid, and shuttle bus routes run

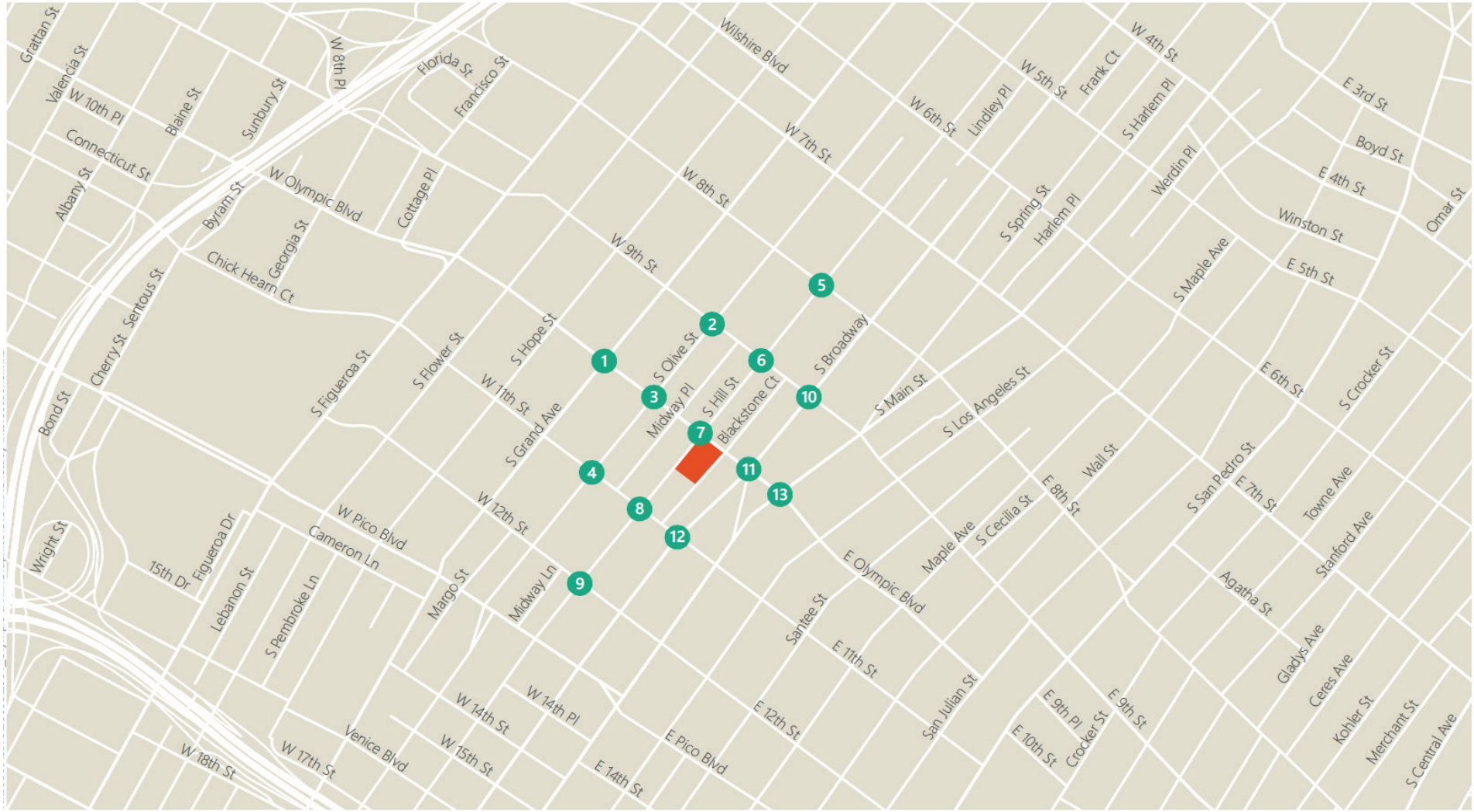
within a ¼-mile of the Project Site, including: Metro local, Metro Rapid, Foothill Transit rapid, DASH, LADOT Commuter Express, and Big Blue Bus rapid routes.

Existing Bicycle and Pedestrian Facilities

Grand Avenue, Olive Street, and Main Street each have bicycle lanes. West 11th Street, east of Broadway, also has a bicycle lane. Approximately ½ mile north of the Project Site, West 7th Street includes a bicycle lane. Figueroa Street has peak hour bus lanes with bicycles permitted south of 7th Street and a bicycle lane north of Wilshire Boulevard. Figure 4 of the Transportation Study shows citywide existing and planned designated bicycle facilities in the Project area.

The Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian and vehicle infrastructure improvements. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035. The Mobility Plan 2035 identifies Hill Street and Hope Street as part of the Neighborhood Enhanced Network. Figueroa Street, Hope Street, Grand Avenue, Olive Street, and Main Street are part of the Tier 1 Bike Lane Network.

The Neighborhood Enhanced Network is the network of locally-serving streets planned to contain traffic calming measures that close the gaps between streets with bicycle facilities. Several streets in the study area are included within the planned Neighborhood Enhanced Network, including Hope Street, Hill Street, and 11th Street. The study area generally has a mature network of pedestrian facilities including sidewalks, crosswalks and pedestrian safety features. Approximately 8- to 18-foot sidewalks are provided throughout the study area.



Source: Fehr & Peers, January 2018.

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Figure VI-3
Study Intersections

Existing Traffic Volumes

Weekday AM and PM peak hour turning movement counts for seven of the 13 study intersections were provided by LADOT and were collected on Thursday, May 7, 2015. An annual growth rate of 1% per year was applied to these volumes to estimate 2017 volumes. New weekday AM and PM peak hour turning movement counts were collected at the remaining six study intersections on Thursday, March 23, 2017. The existing weekday morning and afternoon peak hour volumes at the study intersections and count sheets for the intersection are provided in Figure VI-4 and Figure VI-5.

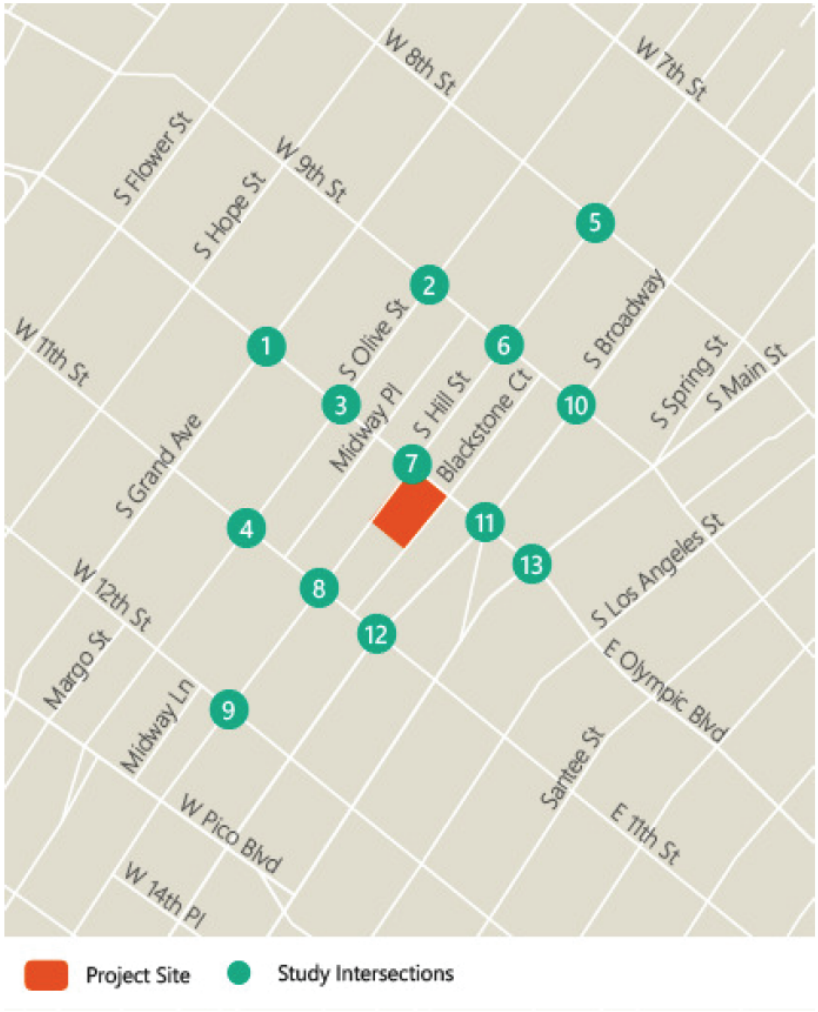
Existing Level of Service

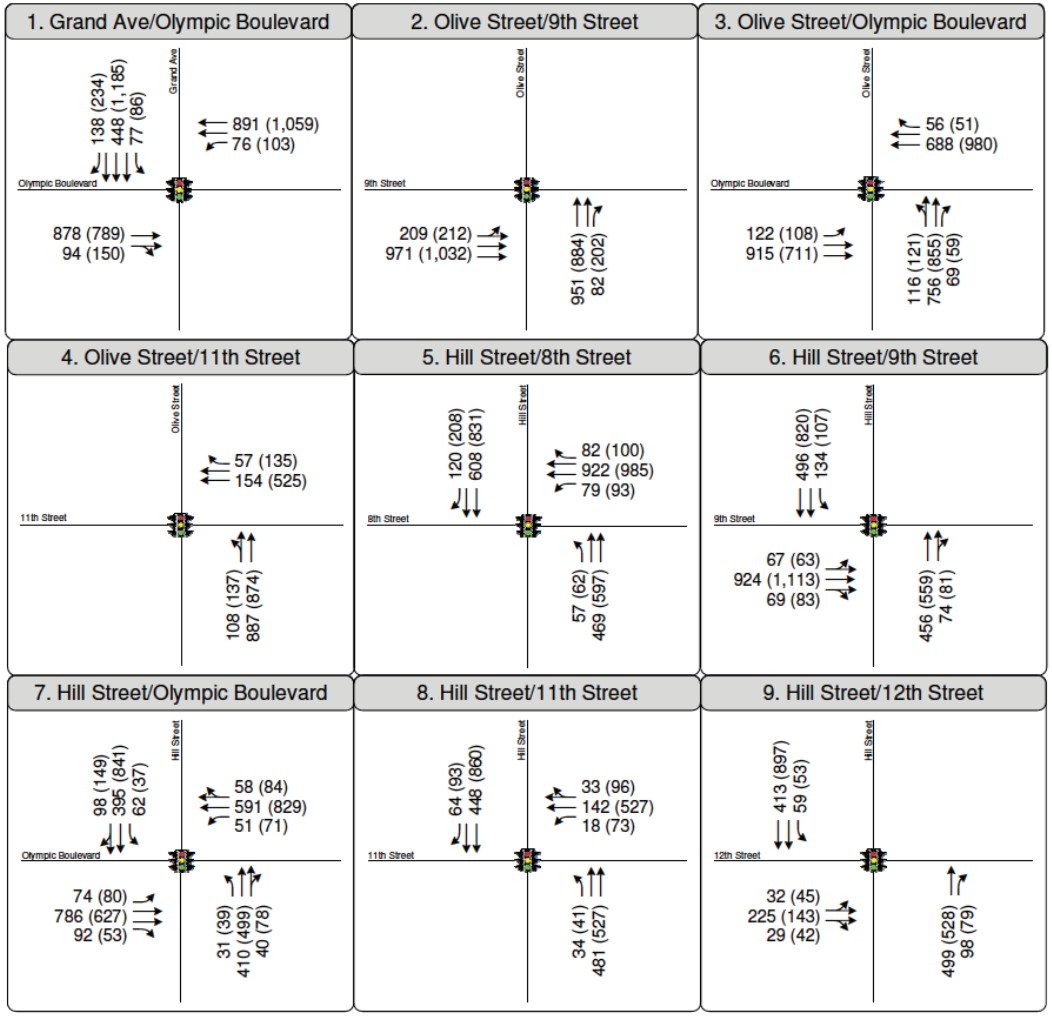
Existing year traffic volumes were analyzed using the intersection capacity analysis methodology described above to determine the existing operating conditions at the study intersections. Table VI-33 summarizes the results of the analysis of the existing weekday morning and afternoon peak hour V/C ratio and corresponding LOS at each of the analyzed intersections. As indicated, all of the 13 intersections analyzed for impacts operate at LOS B or better during both peak periods.

Table VI-33
Existing Condition – Intersection Levels of Service

No.	Intersection	Peak Hour	V/C Ratio	LOS
1.	Grand Avenue & Olympic Boulevard	AM PM	0.374 0.545	A A
2.	Olive Street & 9th Street	AM PM	0.479 0.471	A A
3.	Olive Street & Olympic Boulevard	AM PM	0.501 0.624	A B
4.	Olive Street & 11th Street	AM PM	0.283 0.413	A A
5.	Hill Street & 8th Street	AM PM	0.448 0.547	A A
6.	Hill Street & 9th Street	AM PM	0.401 0.465	A A
7.	Hill Street & Olympic Boulevard	AM PM	0.387 0.614	A B
8.	Hill Street & 11th Street	AM PM	0.131 0.422	A A
9.	Hill Street & 12th Street	AM PM	0.367 0.364	A A
10.	Broadway & 9th Street	AM PM	0.330 0.497	A A
11.	Broadway & Olympic Boulevard	AM PM	0.429 0.606	A B
12.	Broadway & 11th Street	AM PM	0.173 0.393	A A
10.	Main Street & Olympic Boulevard	AM PM	0.408 0.639	A B

Source: Fehr & Peers, January 2018.





Source: Fehr & Peers, January 2018.

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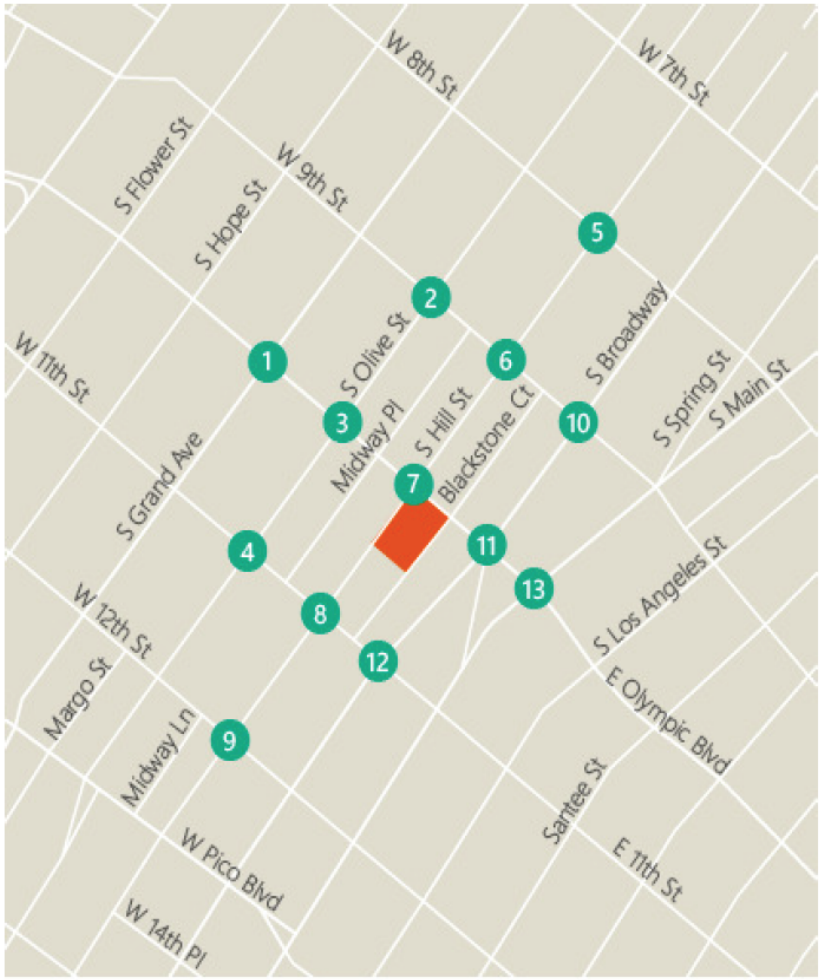
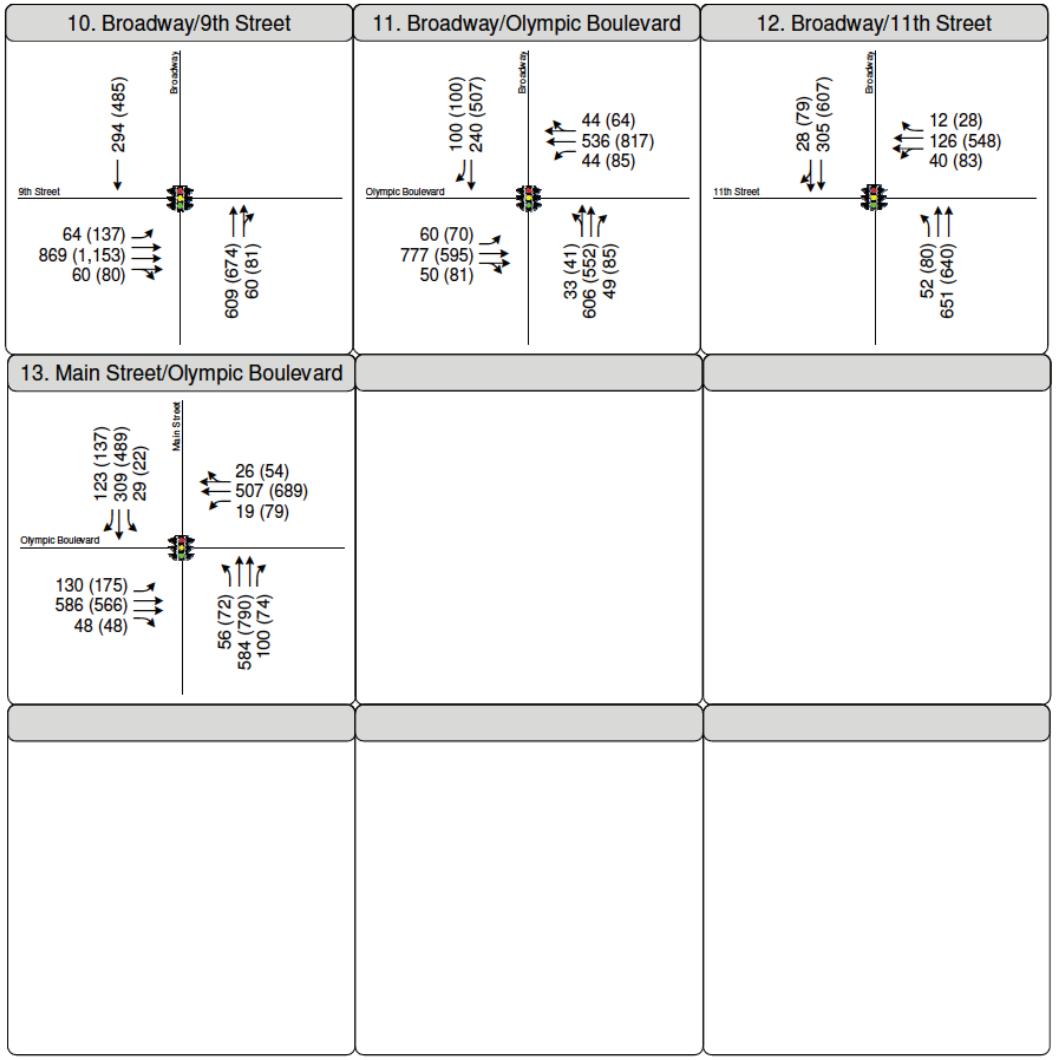
Figure VI-4
Existing (2017) Traffic Volumes - Intersections 1 - 9





Source: Fehr & Peers, January 2018.

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Figure VI-5
Existing (2017) Traffic Volumes - Intersections 10 - 13

Project Impacts

Project Trip Generation

As discussed above, the Proposed Project consists of 700 apartment units, 7,000 square feet of retail space, and 8,000 square feet of quality restaurant space. Trip generation rates from Trip Generation, 9th Edition (Institute of Transportation Engineers [ITE], 2012) were used to estimate the number of trips associated with the Proposed Project and are presented in Table VI-34, below.

The City of Los Angeles' Transportation Impact Study Guidelines state that developments within a ¼-mile walking distance of a transit station, or of a Rapid Bus stop, may qualify for up to a 15% transit credit. There are six rapid bus lines accessible within a ¼-mile walking distance of the Project Site. The Rapid Bus line 794 has a bus stop located on Hill Street, immediately north of Olympic Boulevard. Accordingly, a transit credit of 15% was applied to the Project's retail and quality restaurant uses. The daily transit credit is assumed to be 75% of the average of AM and PM peak hour credit.

Per LADOT's Transportation Impact Study Guidelines, Attachment 1 Policy on Pass-By Trips, a 50% pass-by credit was applied to the Proposed Project's retail use, and a 10% pass-by credit was applied to the quality restaurant use. Pass-by credits account for the patrons making an intermediate stop on the way from an origin to a primary trip destination without a route diversion. These trips would be attracted from traffic passing the Project Site on Hill Street, Olympic Boulevard, and other nearby streets.

Internal trip credits can be defined as a reduction that can be applied to the trip generation estimates for individual land uses to account for trips internal to the Project Site. These are trips usually made via walking within the Project Site. The percentages are informed by the Trip Generation for Mixed-Use Development calculation methodology described in Chapter 6 of the ITE Trip Generation Handbook, 3rd Edition (2014). Internalization percentages were derived from Transportation Research Board (TRB) National Cooperative Highway Research Program (NCHRP) Report 684: Enhancing Internal Trip Capture Estimation for Mixed-Use Developments. The internal trip credits are based on the NCHRP analysis.

As shown in Table VI-34, the Proposed Project is projected to generate an estimated net increase of 3,392 daily trips, including 242 trips (49 inbound/193 outbound) during the AM peak hour and 285 trips (181 inbound/104 outbound) during the PM peak hour.

Table VI-34
Vehicle Trip Generation Estimate

Trip Generation Rates								
Land Use (Land Use Code)	**Size**	**Daily**	**AM Peak Hour**			**PM Peak Hour**		
			Rate	**In%**	**Out%**	**Rate**	**In%**	**Out%**
High-Rise Residential (222, 232) [e]	700 du	4.20	0.34	19%	81%	0.38	62%	38%
Internal Capture [b]		3%		2%	1%		5%	9%
Retail (820)	7 ksf	42.70	0.96	62%	38%	3.71	48%	52%
Less: Internal Capture [b]		39%		14%	40%		60%	54%
Less: Transit Credit [c]		5%	15%			15%		
Less: Pass-by [d]		50%	50%			50%		
Quality Restaurant (931)	8 ksf	89.95	0.81	82%	18%	7.49	67%	33%
Less: Internal Capture [b]		24%		33%	0%		25%	47%
Less: Transit Credit [c]		8%	15%			15%		
Less: Pass-by [d]		10%	10%			10%		

Estimated Trip Generation								
Land Use	**Size**	**Daily**	**AM Peak Hour**			**PM Peak Hour**		
			In	**Out**	**Total**	**In**	**Out**	**Total**
High-Rise Residential [e]	700 du	2,940	45	193	238	165	101	266
Internal Capture [b]		(88)	(1)	(2)	(3)	(9)	(9)	(18)
Net External Vehicle Trips		***2,852***	***44***	***191***	***235***	***156***	***92***	***248***
Retail	7 ksf	299	4	3	7	12	14	26
Less: Internal Capture [b]		(117)	(1)	(1)	(2)	(7)	(8)	(15)
Less: Transit Credit [c]		(9)	0	0	0	(1)	(1)	(2)
Total Driveway Trips		173	3	2	5	4	5	9
Less: Pass-by [d]		(86)	(1)	(1)	(2)	(2)	(2)	(4)
Net External Vehicle Trips		***87***	***2***	***1***	***3***	***2***	***3***	***5***
Quality Restaurant	8 ksf	720	5	1	6	40	20	60
Less: Internal Capture [b]		(173)	(2)	0	(2)	(10)	(9)	(19)
Less: Transit Credit [c]		(44)	0	0	0	(5)	(2)	(7)
Total Driveway Trips		503	3	1	4	25	9	34
Less: Pass-by [d]		(50)	0	0	0	(2)	0	(2)
Net External Vehicle Trips		***453***	***3***	***1***	***4***	***23***	***9***	***32***
Total Project Driveway Trips		**3,528**	**50**	**194**	**244**	**185**	**106**	**291**
NET External Vehicle Trips		**3,392**	**49**	**193**	**242**	**181**	**104**	**285**

Notes:
du = dwelling unit; ksf = thousands of square feet of gross floor area

[a] *Source: Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.*

[b] *Internal capture represents the percentage of trips between land uses that occur within the site. This percentage is informed by the Trip Generation for Mixed-Use Development calculation methodology described in Chapter 6 of the ITE Trip Generation Handbook, 3rd Edition, 2014. Internalization percentages are derived from NCHRP Report 684: Enhancing Internal Trip Capture Estimation for Mixed-Use Developments, Transportation Research Board, 2011. See Attachment B of Transportation Study for detailed calculation tables. The daily credit is assumed to be 75% of peak hour credits taken.*

[c] *The transit credit is based on LADOT's Traffic Study Policies and Procedures, December 2016. The guidelines state that up to 15% transit credit may be taken for projects within 1/4 mile walking distance of a transit station or of a RapidBus stop. The nearest RapidBus service is provided by Route 728 on Olympic Boulevard and Hill Street and Route 794 on Hill Street, adjacent to the Project Site. The daily credit is assumed to be 75% of peak hour credits taken.*

[d] *The pass-by credit is based on Attachment I of LADOT's Traffic Study Policies and Procedures, December 2016.*

[e] *For flexibility, the trip generation analysis uses the most conservative (highest) rates for high-rise apartments versus high-rise condominiums: ITE code 222 (high-rise apartment) for daily trips and ITE code 232 (high-rise condominium) for peak hour trips. Since the high-rise residences in the ITE database are generally in urban areas with transit service, no additional transit credit was taken to provide a conservative estimate.*

Source: Fehr & Peers, Olympic & Hill Project Transportation Impact Analysis, January 2018.

Project Traffic Distribution

The geographic distribution of trips generated by the Proposed Project is dependent on characteristics of the street system serving the Project Site; the level of accessibility of routes to and from the proposed project site; locations of employment and commercial centers to which residents of the Project would be drawn; and residential areas from which the commercial visitors would be drawn. A select zone analysis was conducted for the proposed uses using the City of Los Angeles' Travel Demand Model to inform the general distribution pattern for the Transportation Study. The distribution of Proposed Project trips is illustrated in Figure VI-6.

Project Traffic Assignment

The traffic to be generated by the Proposed Project was assigned to the street network using the distribution pattern described in Figure VI-6. Figure VI-7 and III-8 provides the assignment of the Proposed Project generated peak hour traffic volumes at the analyzed intersections during the AM and PM peak hours. The assignment of traffic volumes took into consideration the locations of the proposed Project driveways on Hill Street and Olympic Boulevard.

Project Driveways

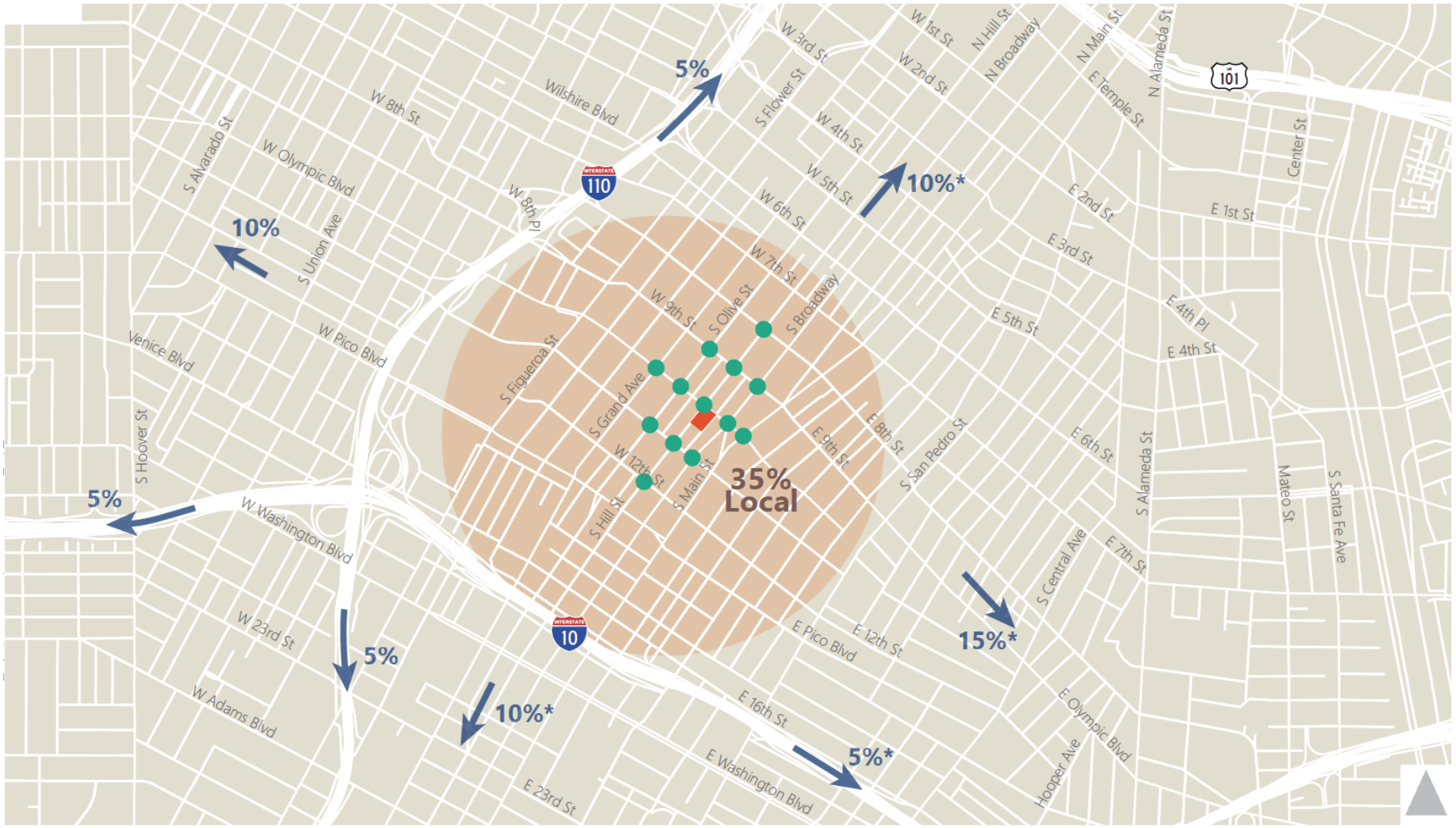
As discussed, both driveways will allow full access to the building's underground parking, including shared access for residents and retail and restaurant customers.

Criteria For Determination of Significant Traffic Impact

The City of Los Angeles has established threshold criteria to determine significant traffic impact of a proposed project in its jurisdiction. Under the LADOT guidelines, an intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C, equal to or greater than 0.02 for intersections operating at LOS D, and equal to or greater than 0.01 for intersections operating at LOS E or F after the addition of Project traffic. Intersections operating at LOS A or B after the addition of the project traffic are not considered significantly impacted regardless of the increase in V/C ratio. The following summarizes the impact criteria:

Table VI-35
Definition of Significant Impact at Intersection

Level of Service	Final V/C Ratio	Project-Related Increase in V/C
C	0.701–0.800	Equal to or greater than 0.04
D	0.801–0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01
Source: City of Los Angeles.		



Source: Fehr & Peers, January 2018.

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Figure VI-6
Trip Distribution

Existing Plus Project Traffic Level of Service

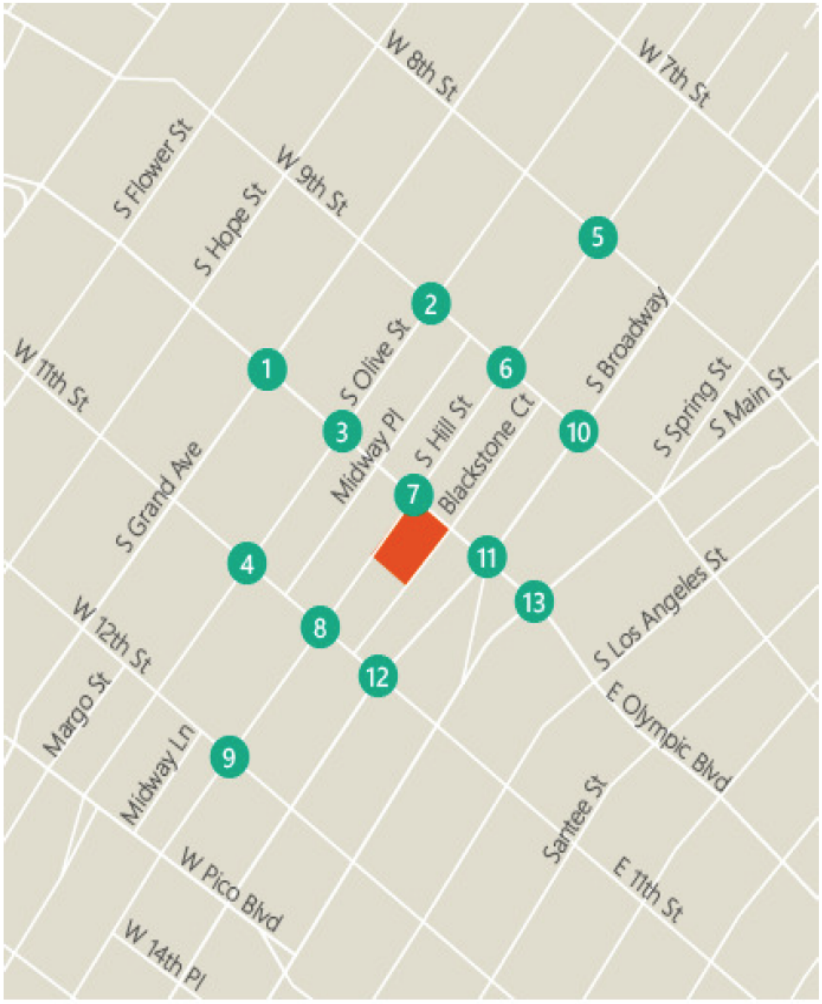
The Proposed Project traffic estimated and assigned to the study intersections was added to the existing traffic volumes to estimate Existing plus Project traffic volumes. Turning movement traffic volumes for the Existing plus Project scenario are provided in Figure VI-7 and Figure VI-8.

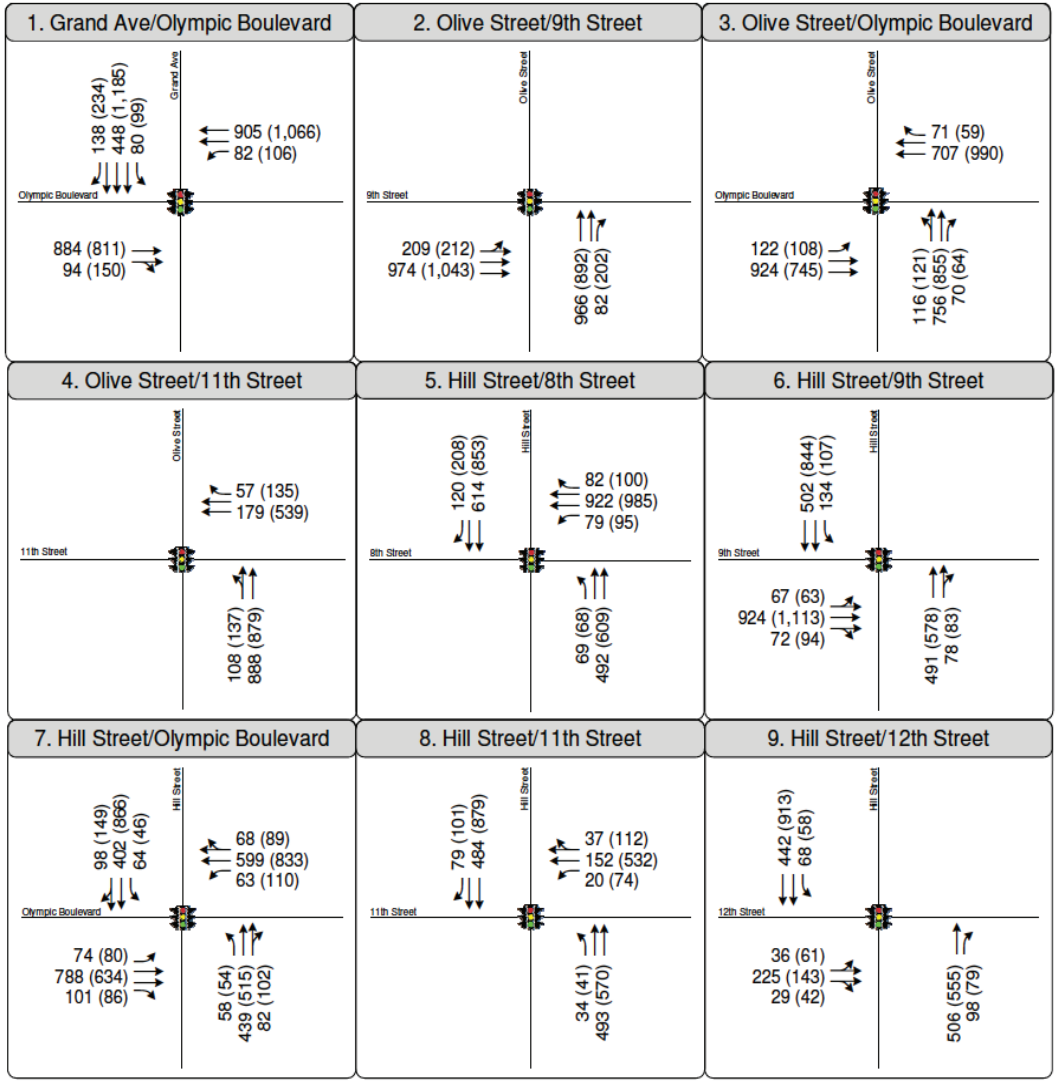
The Existing plus Project traffic volumes were analyzed to determine the Projected V/C ratios and LOS for each of the analyzed intersections under this scenario. Table VI-36 summarizes the Existing plus Project LOS. As indicated in Table VI-36, all 13 signalized intersections are projected to operate at LOS B or better during both peak hours. As shown in Table VI-36, after applying the aforementioned City of Los Angeles significant impact criteria, it is determined that the proposed Project would not result in significant impacts under Existing plus Project conditions at any of the study intersections.

Table VI-36
Existing Plus Project Intersection Levels of Service and Impact Analysis

No.	Intersection	Peak Hour	Existing		Existing Plus Project		V/C Increase	Significant Impact?
			V/C	LOS	V/C	LOS		
1.	Grand Avenue & Olympic Boulevard	AM	0.374	A	0.380	A	0.006	No
		PM	0.545	A	0.555	A	0.010	No
2.	Olive Street & 9th Street	AM	0.479	A	0.485	A	0.006	No
		PM	0.471	A	0.476	A	0.005	No
3.	Olive Street & Olympic Boulevard	AM	0.501	A	0.508	A	0.007	No
		PM	0.624	B	0.627	B	0.003	No
4.	Olive Street & 11th Street	AM	0.283	A	0.292	A	0.009	No
		PM	0.413	A	0.419	A	0.006	No
5.	Hill Street & 8th Street	AM	0.448	A	0.458	A	0.010	No
		PM	0.547	A	0.559	A	0.012	No
6.	Hill Street & 9th Street	AM	0.401	A	0.415	A	0.014	No
		PM	0.465	A	0.474	A	0.009	No
7.	Hill Street & Olympic Boulevard	AM	0.387	A	0.421	A	0.034	No
		PM	0.614	B	0.635	B	0.021	No
8.	Hill Street and 11th Street	AM	0.131	A	0.147	A	0.016	No
		PM	0.422	A	0.435	A	0.013	No
9.	Hill Street & 12th Street	AM	0.367	A	0.379	A	0.012	No
		PM	0.364	A	0.391	A	0.027	No
10.	Broadway & 9th Street	AM	0.330	A	0.335	A	0.005	No
		PM	0.497	A	0.505	A	0.008	No
11.	Broadway & Olympic Boulevard	AM	0.429	A	0.447	A	0.018	No
		PM	0.606	B	0.619	B	0.013	No
12.	Broadway & 11th Street	AM	0.173	A	0.174	A	0.001	No
		PM	0.393	A	0.408	A	0.015	No
13.	Main Street & Olympic Boulevard	AM	0.408	A	0.418	A	0.010	No
		PM	0.639	B	0.652	B	0.013	No

Source: Fehr & Peers, January 2018.





Source: Fehr & Peers, January 2018.

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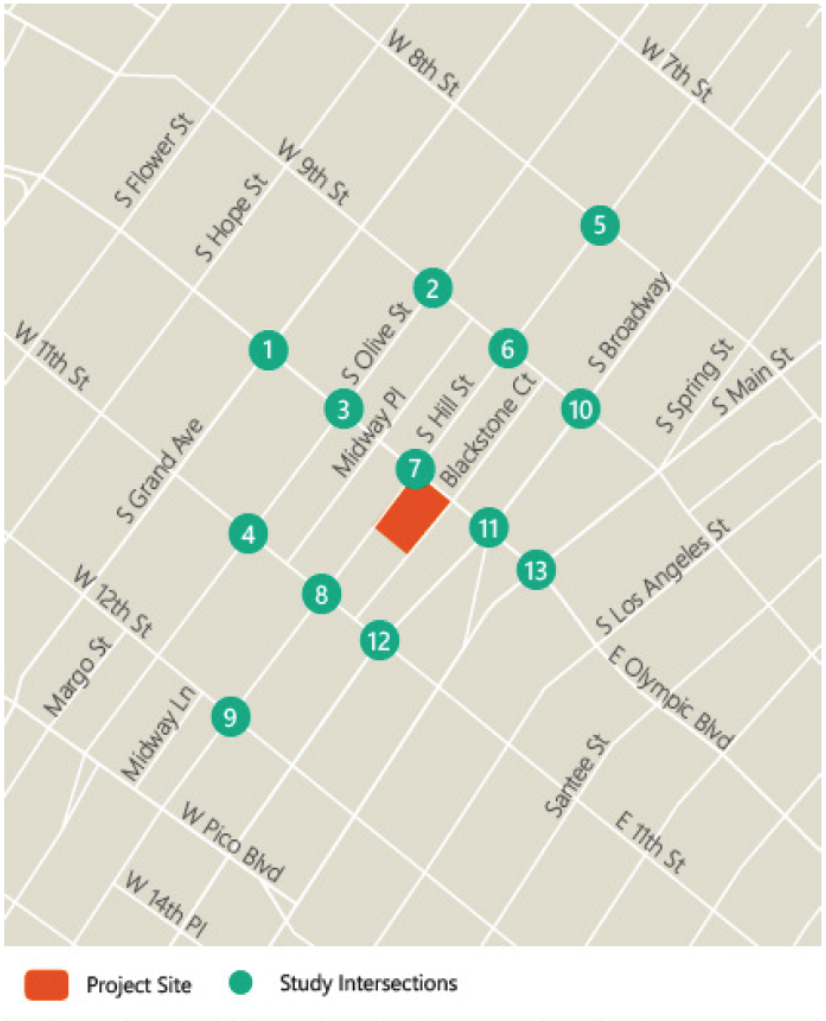
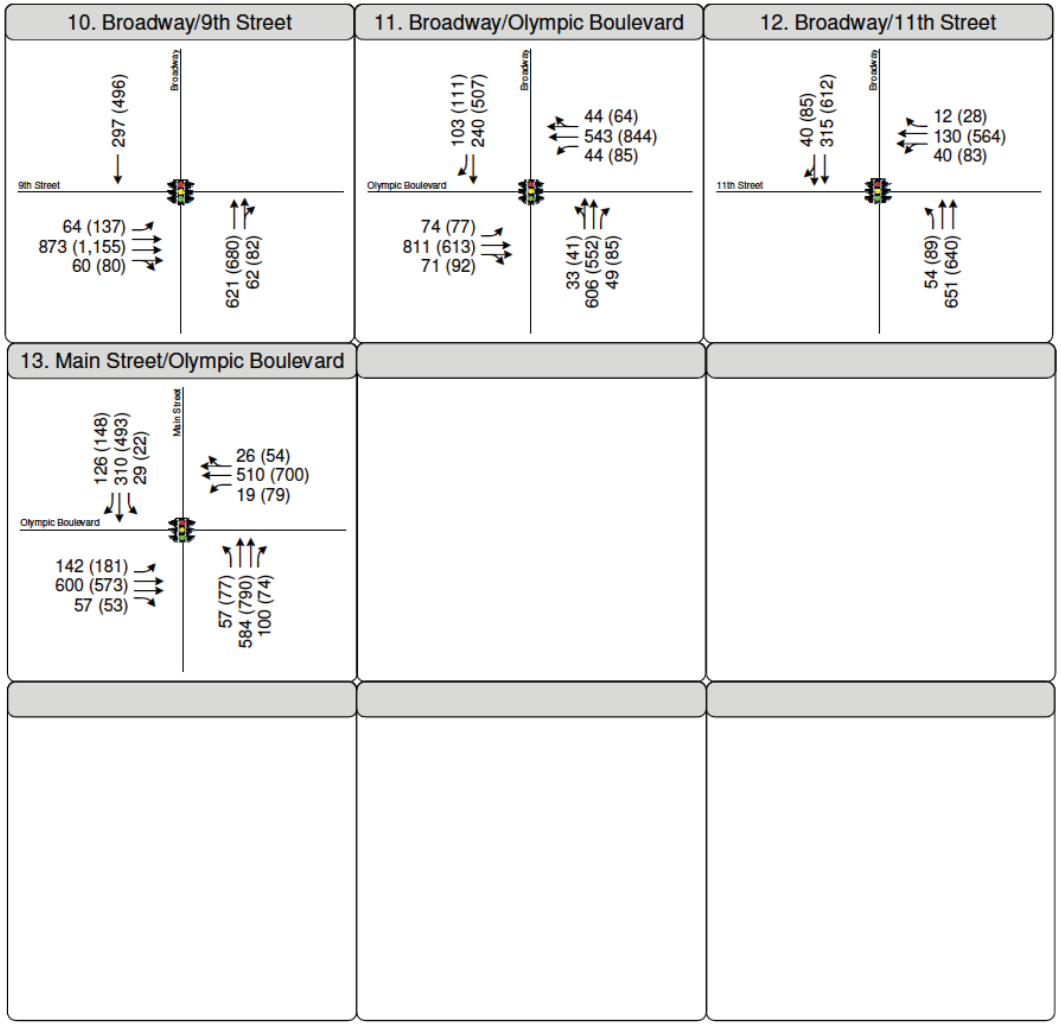
Figure VI-7
Existing (2017) Plus Project Traffic Volumes - Intersections 1 -9





Source: Fehr & Peers, January 2018.

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Figure VI-8
Existing (2017) Plus Project Traffic Volumes - Intersections 10 - 13

Future Conditions (Year 2022)

To evaluate the potential impacts of the Proposed Project on future (Year 2022) conditions, it was necessary to develop estimates of future traffic conditions in the area both without and with Project traffic. First, estimates of traffic growth were developed for the study area to forecast future conditions without the Proposed Project. These forecasts included traffic increases as a result of both regional ambient traffic growth and traffic generated by specific developments in the vicinity of the Project (related projects).

These projected traffic volumes, identified herein as the Future Base conditions, represent the future conditions without the Proposed Project. The traffic generated by the Proposed Project was then estimated and assigned to the surrounding street system. Project traffic was added to the Future Base conditions to form Future (year 2022) plus Project traffic conditions, which were analyzed to determine the incremental traffic impacts attributable to the Project itself.

The assumptions and analysis methodology used to develop each of the future year scenarios discussed above are described in more detail in the following sections.

Background or Ambient Growth

Based on historic trends and at the direction of LADOT, it was established that an ambient growth factor of 1% per year should be applied to adjust the existing base year traffic volumes to reflect the effects of regional growth and development by year 2022. This adjustment was applied to the existing (year 2017) traffic volume data to reflect the effect of ambient growth by the year 2022.

Related Project Traffic Generation and Assignment

Future Base traffic forecasts include the effects of known specific projects, called related projects, expected to be implemented in the vicinity of the proposed project site prior to the buildout date of the Proposed Project. The list of related projects was prepared based on data from LADOT. A total of 111 cumulative projects were identified in the study area; these projects are listed in Table II-6 and illustrated in Figure II-16 of the Project Description section.

Trip Generation / Distribution

Trip generation estimates for the related projects were calculated using a combination of previous study findings, publicly available environmental documentation, and trip generation rates contained in Trip Generation, 9th Edition. Table 6 in the Transportation Study presents the resulting trip generation estimates for these related projects. These projections are conservative in that they do not in every case account for either the existing uses to be removed or the possible use of non-motorized travel modes (transit, walking, etc.). Traffic mitigation measures associated with the related projects are also not in every case accounted for in the analysis.

The geographic distribution of the traffic generated by the related projects is dependent on several factors. These factors include the type and density of the proposed land uses, the geographic distribution of population from which employees and potential patrons of proposed commercial developments may be

drawn, the locations of employment and commercial centers to which residents of residential projects may be drawn, and the location of the projects in relation to the surrounding street system. Additionally, if the traffic study or environmental document for a related project was available, the trip distribution from that study was used.

Future Year (2022) Base Traffic Volumes

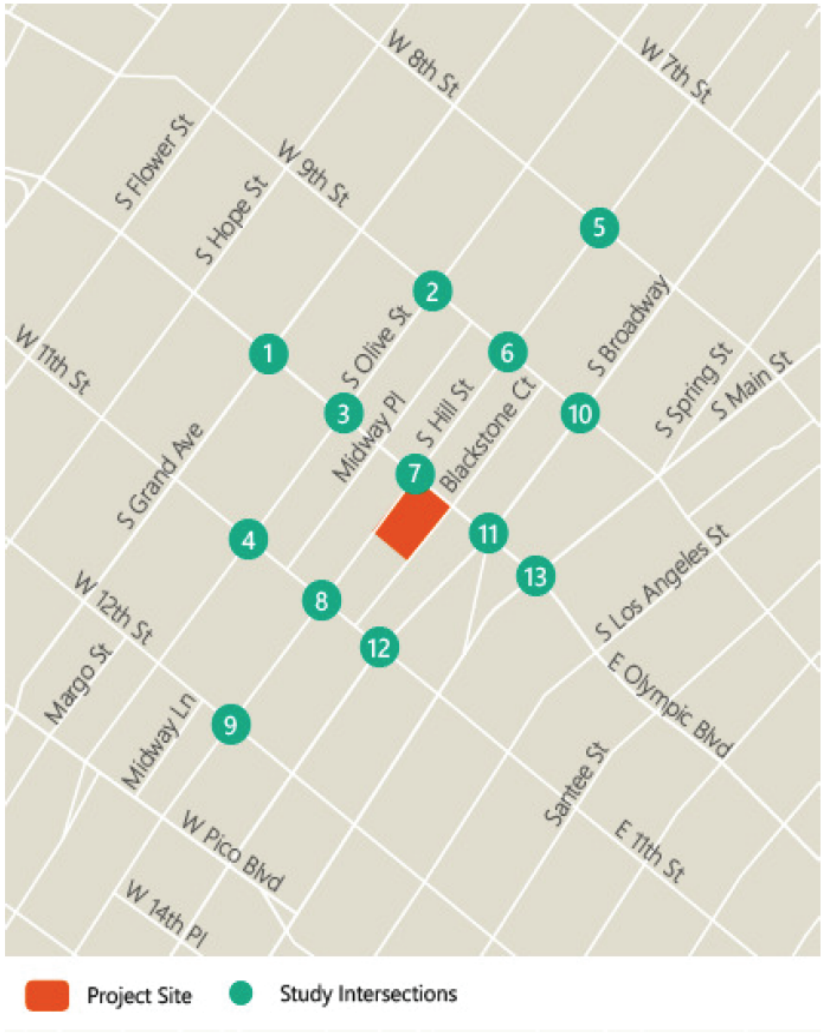
Future year 2022 base weekday AM and PM peak hour traffic volumes and lane geometries for the analyzed intersections are provided in Figure VI-9 and Figure VI-10, below. The Future Base traffic conditions represent an estimate of future conditions without the proposed Project inclusive of the ambient background growth and related projects traffic.

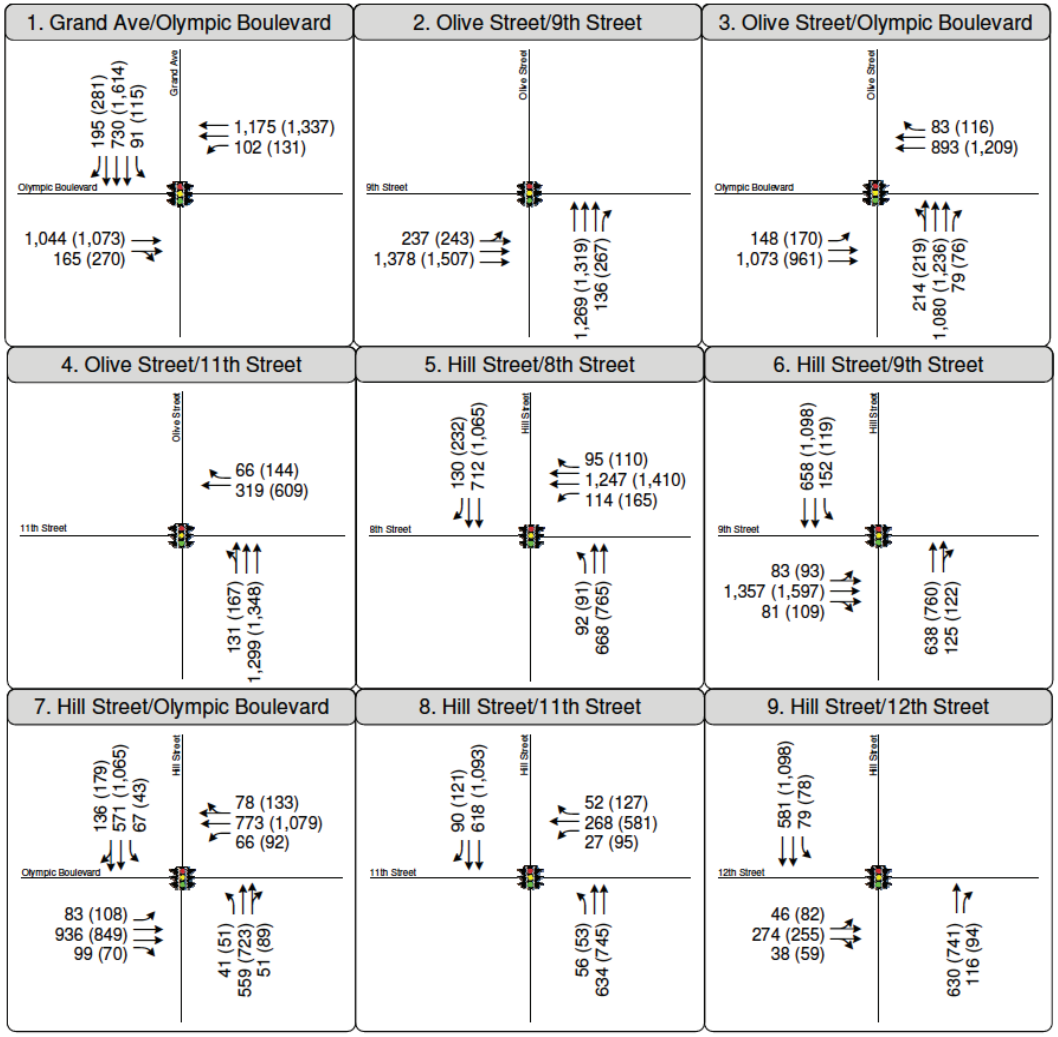
Future Base Traffic Conditions

The year 2022 Future Base peak hour traffic volumes were analyzed to determine the projected V/C ratio and LOS for each of the analyzed intersections. Table VI-37 summarizes the future LOS. All of the 13 signalized intersections analyzed for impacts are projected to operate at LOS D or better during the morning and afternoon peak hours under Future Base conditions. None of the study intersections are projected to operate at LOS E or worse during either of the peak hours under Future Base conditions.

Future Plus Project Traffic Conditions

The resulting Future (year 2022) plus Project peak hour traffic volumes, provided in Figure VI-11 and Figure VI-12, were analyzed to determine the projected future operating conditions with the addition of the Proposed Project traffic. The results of the Future (year 2022) plus Project analysis are also presented in Table VI-37. All of the 13 signalized intersections analyzed for impacts are projected to operate at LOS D or better during the morning and afternoon peak hours under Future (year 2022) plus Project conditions during afternoon peak hour.





Source: Fehr & Peers, January 2018.

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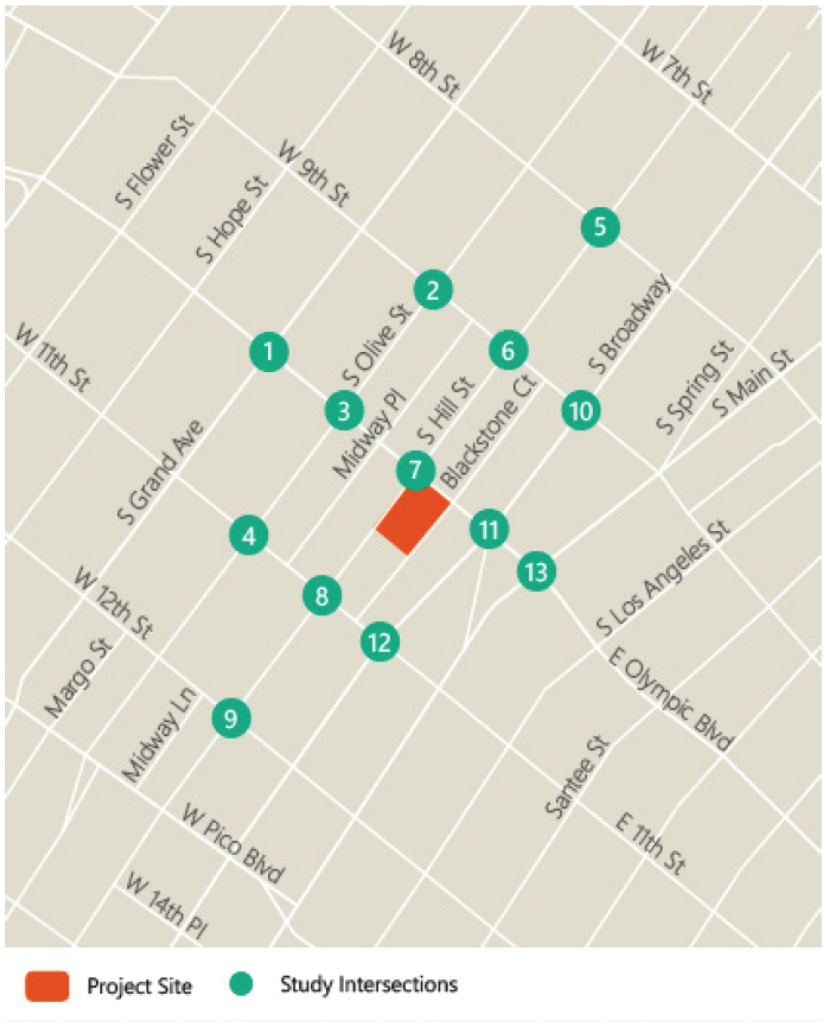
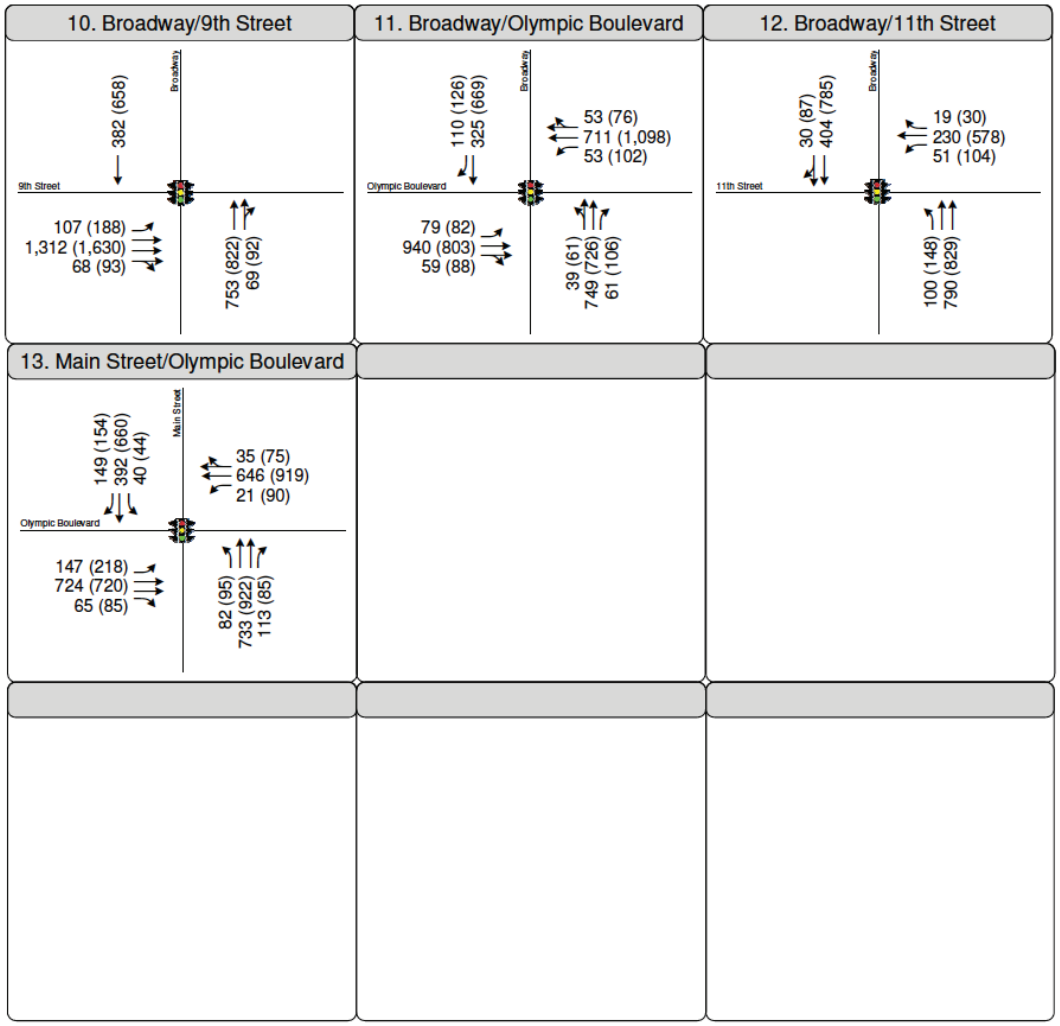
Figure VI-9
Future (2022) Base Traffic Volumes - Intersections 1 - 9





Source: Fehr & Peers, January 2018.

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Figure VI-10
Future (2022) Base Traffic Volumes - Intersections 10 - 13

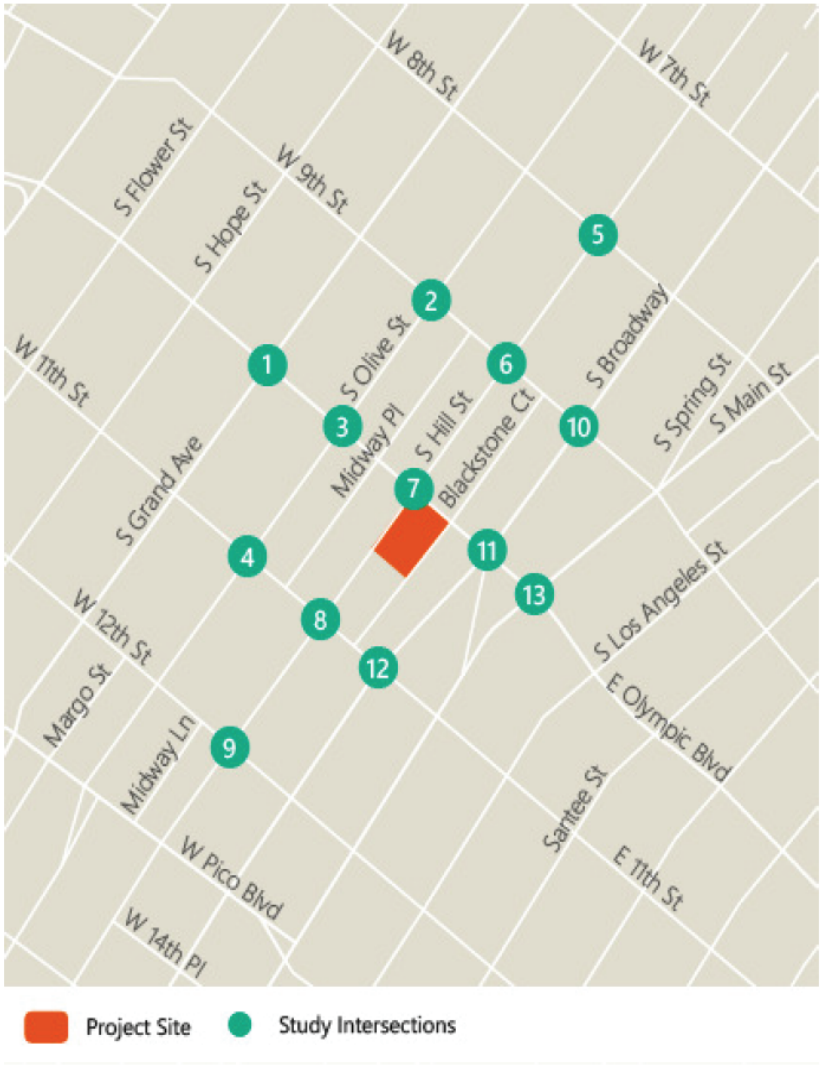
Future Year (2022) Plus Project Intersection Impacts

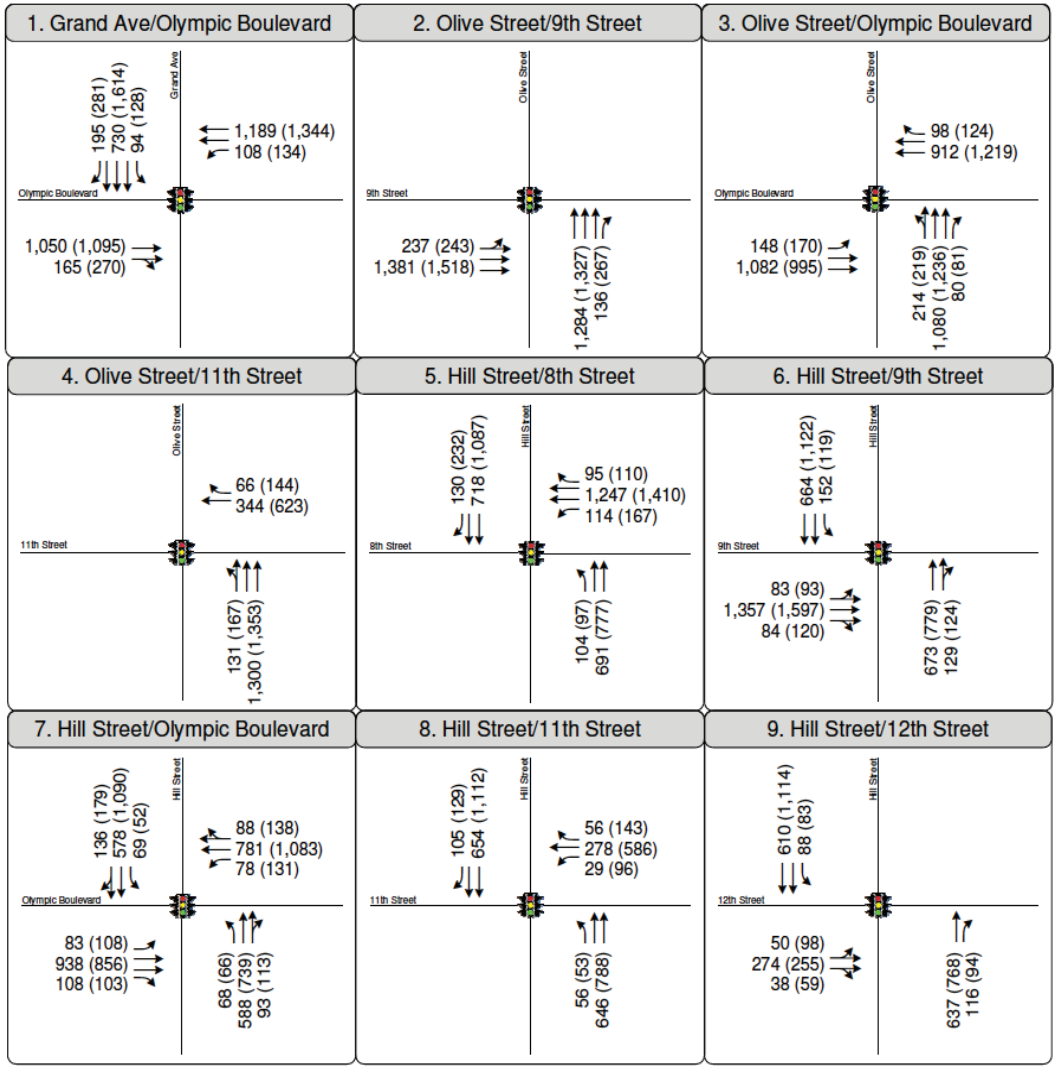
As shown in Table VI-37, using the criteria for determination of significant impacts, it is determined that the Proposed Project would result in a significant impact at Olympic Boulevard & Hill Street (intersection #7) under Future (year 2022) plus Project conditions during the PM peak hour.

Table VI-37
Future (2022) Plus Project Intersection Levels of Service and Impact Analysis

No.	Intersection	Peak Hour	Future (2022)		Future (2022) Plus Project		V/C Increase	Significant Impact?
			V/C	LOS	V/C	LOS		
1.	Grand Avenue & Olympic Boulevard	AM	0.533	A	0.539	A	0.006	No
		PM	0.794	C	0.803	D	0.009	No
2.	Olive Street & 9th Street	AM	0.541	A	0.545	A	0.004	No
		PM	0.582	A	0.586	A	0.004	No
3.	Olive Street & Olympic Boulevard	AM	0.584	A	0.590	A	0.006	No
		PM	0.740	C	0.743	C	0.003	No
4.	Olive Street & 11th Street	AM	0.431	A	0.447	A	0.016	No
		PM	0.643	B	0.653	B	0.010	No
5.	Hill Street & 8th Street	AM	0.615	B	0.625	B	0.010	No
		PM	0.786	C	0.797	C	0.011	No
6.	Hill Street & 9th Street	AM	0.594	A	0.607	B	0.013	No
		PM	0.673	B	0.683	B	0.010	No
7.	Hill Street & Olympic Boulevard	AM	0.519	A	0.548	A	0.029	No
		PM	0.825	D	0.847	D	0.022	Yes
8.	Hill Street and 11th Street	AM	0.322	A	0.341	A	0.019	No
		PM	0.687	B	0.697	B	0.010	No
9.	Hill Street & 12th Street	AM	0.492	A	0.504	A	0.012	No
		PM	0.578	A	0.605	B	0.027	No
10.	Broadway & 9th Street	AM	0.481	A	0.486	A	0.005	No
		PM	0.721	C	0.729	C	0.008	No
11.	Broadway & Olympic Boulevard	AM	0.545	A	0.563	A	0.018	No
		PM	0.833	D	0.847	D	0.014	No
12.	Broadway & 11th Street	AM	0.317	A	0.319	A	0.002	No
		PM	0.675	B	0.695	B	0.020	No
13.	Main Street & Olympic Boulevard	AM	0.541	A	0.551	A	0.010	No
		PM	0.880	D	0.894	D	0.014	No

Source: Fehr & Peers, January 2018.





Source: Fehr & Peers, January 2018.

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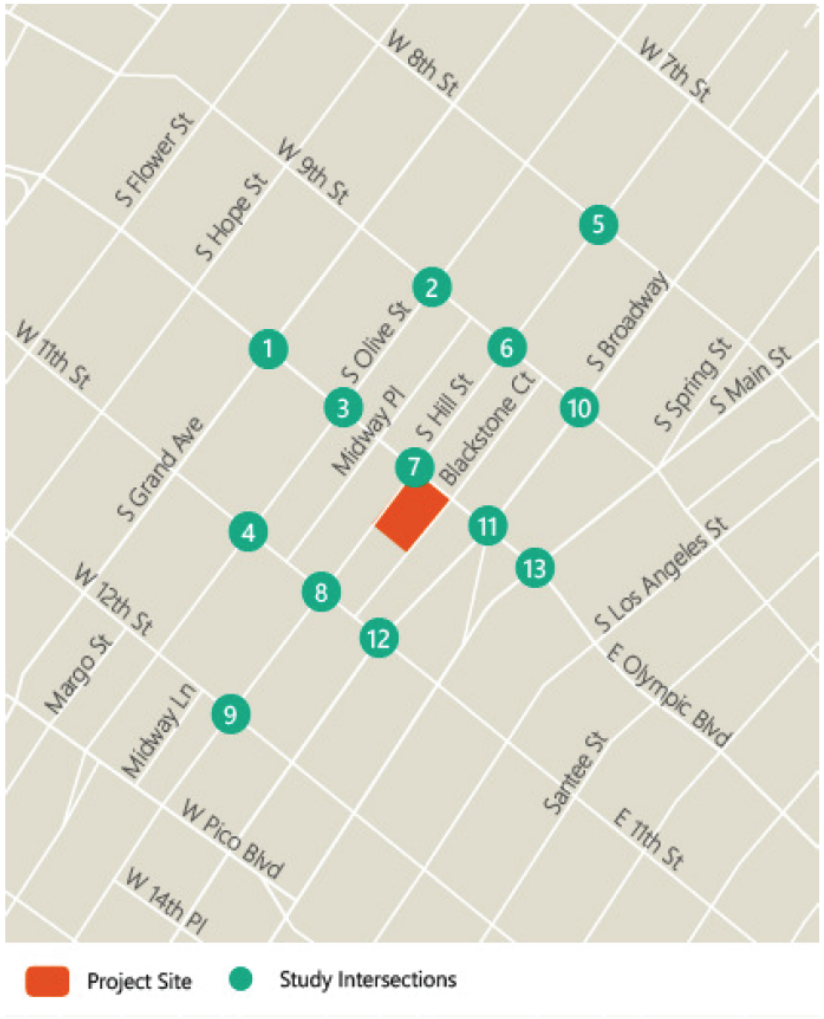
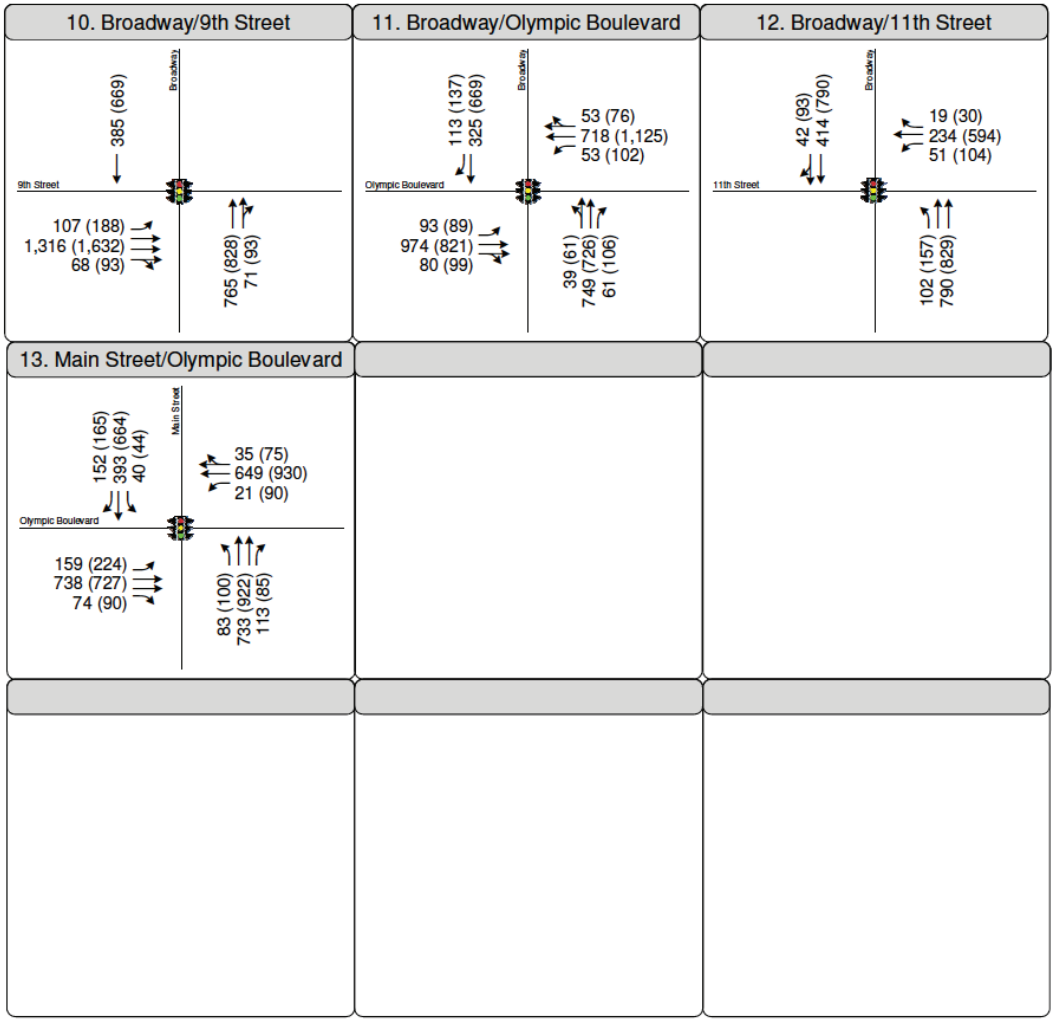
Figure VI-11
Future (2022) Plus Project Traffic Volumes - Intersections 1 - 9





Source: Fehr & Peers, January 2018.

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Figure VI-12
Future (2022) Plus Project Traffic Volumes - Intersections 10 - 13

Table VI-38
Mitigated Vehicle Trip Generation Estimate

Trip Generation Rates								
Land Use (Land Use Code)	**Size**	**Daily**	**AM Peak Hour**			**PM Peak Hour**		
			Rate	**In%**	**Out%**	**Rate**	**In%**	**Out%**
High-Rise Residential (222, 232)	700 du	4.20	0.34	19%	81%	0.38	62%	38%
Internal Capture		3%		2%	1%		5%	9%
Less: TDM Credit		15%	15%			15%		
Retail (820)	7 ksf	42.70	0.96	62%	38%	3.71	48%	52%
Less: Internal Capture		39%		14%	40%		60%	54%
Less: Transit Credit		5%	15%			15%		
Less: Pass-by		50%	50%			50%		
Quality Restaurant (931)	8 ksf	89.95	0.81	82%	18%	7.49	67%	33%
Less: Internal Capture		24%		33%	0%		25%	47%
Less: Transit Credit		8%	15%			15%		
Less: Pass-by		10%	10%			10%		

Estimated Trip Generation								
Land Use	**Size**	**Daily**	**AM Peak Hour**			**PM Peak Hour**		
			In	**Out**	**Total**	**In**	**Out**	**Total**
High-Rise Residential	700 du	2,940	45	193	238	165	101	266
Internal Capture		(88)	(1)	(2)	(3)	(9)	(9)	(18)
Less: TDM Credit		(427)	(6)	(28)	(34)	(23)	(13)	(36)
Net External Vehicle Trips		***2,425***	***38***	***163***	***201***	***133***	***79***	***212***
Retail	7 ksf	299	4	3	7	12	14	26
Less: Internal Capture		(117)	(1)	(1)	(2)	(7)	(8)	(15)
Less: Transit Credit		(9)	0	0	0	(1)	(1)	(2)
Total Driveway Trips		173	3	2	5	4	5	9
Less: Pass-by		(86)	(1)	(1)	(2)	(2)	(2)	(4)
Net External Vehicle Trips		***87***	***2***	***1***	***3***	***2***	***3***	***5***
Quality Restaurant	8 ksf	720	5	1	6	40	20	60
Less: Internal Capture		(173)	(2)	0	(2)	(10)	(9)	(19)
Less: Transit Credit		(44)	0	0	0	(5)	(2)	(7)
Total Driveway Trips		503	3	1	4	25	9	34
Less: Pass-by		(50)	0	0	0	(2)	0	(2)
Net External Vehicle Trips		***453***	***3***	***1***	***4***	***23***	***9***	***32***
Total Project Driveway Trips		**3,101**	**44**	**166**	**210**	**162**	**93**	**255**
NET External Vehicle Trips		**2,965**	**43**	**165**	**208**	**158**	**91**	**249**

Notes:
du = dwelling unit; ksf = thousands of square feet of gross floor area
Source: Fehr & Peers, Olympic & Hill Project Transportation Impact Analysis, January 2018.

Table VI-39
Future (2022) Plus Project with Mitigation Intersection Levels of Service and Impact Analysis

No.	Intersection	Peak Hour	Future (2022) Plus Project		V/C Increase	Significant Impact?	Future + Project w/ Mitigation		V/C Increase	Significant Impact?
			V/C	LOS			V/C	LOS		
7.	Hill Street & Olympic Boulevard	AM	0.548	A	0.029	No	0.545	A	0.026	No
		PM	0.847	D	0.022	Yes	0.844	D	0.019	No

Source: Fehr & Peers, January 2018.

The TDM+ tool developed by Fehr & Peers was used to quantify the potential trip reduction for the Project due to implementation of these TDM measures. The TDM+ tool is based on research conducted by Fehr & Peers under contract to the California Air Pollution Control Officers Association (CAPCOA) and elsewhere. It considers a variety of TDM strategies and the setting in which they may apply, estimates effectiveness for each, and applies caps when appropriate (for example, simply aggregating the effectiveness of individual TDM measures can sometimes yield a result that is overblown since more than one measure may be targeting the same trip). With the TDM+ tool, it was estimated that a net overall reduction in trips of approximately 15% could be achieved. The results of the TDM+ tool analysis are presented in Appendix F of the Transportation Study.

Upon discussion with LADOT, a 15% TDM credit was applied to the residential trip generation estimates for the Proposed Project. The mitigated trip generation estimate for the Proposed Project are presented in Table VI-38. Table VI-39 shows LOS and significant impact analysis results after implementation of the TDM program under Existing and Future plus Project conditions. After applying the aforementioned mitigation, the significant impact at the intersection of Olympic Boulevard & Hill Street would be reduced to a less than significant level. Refer to Mitigation Measure T-1 and T-2, above.

A Monitoring Program shall be prepared to provide continued monitoring of the TDM Plan's effectiveness. The Monitoring Program shall be prepared by a licensed Transportation Engineer and be submitted to the Department of Transportation for review. The Monitoring Program shall continue until such time that the Project has shown, for three consecutive years, at a minimum of 85 percent occupancy, a minimum fifteen (15) percent effectiveness in reducing new vehicle trips through implementation of the TDM Plan. Should the review show that the trip reductions have not been met, the Project shall have one year to attain compliance or be subject to a penalty program.

Construction Traffic

Temporary Traffic Impacts

Full-time closure of the sidewalk and one parking lane on a portion of Hill Street, on the east side along the project frontage, is anticipated for the duration of the project. Additionally, one vehicular travel lane along the project frontage would be closed for a portion of the construction phase. Pedestrian and vehicular access to nearby businesses will remain open during the construction period. Hill Street is classified as an Avenue II.

Full-time closure of the sidewalk on Olympic Boulevard, on the south side along the project frontage, is anticipated for the duration of the project. Additionally, one vehicular travel lane along the project frontage would be closed for a portion of the construction phase. Olympic Boulevard is classified as an Avenue I. In addition, there are no emergency services in the immediate vicinity of the affected streets. Since the closures during construction would be for the parking lane and one travel lane each on Hill Street and Olympic Boulevard, the temporary construction impacts on the roadway network would be considered less than significant.

The intersection of Hill Street & Olympic Boulevard operates at LOS A in the AM peak hour and LOS B in the PM peak hour under existing conditions and would to operate at LOS A during the AM peak hour and at LOS D during the PM peak hour under cumulative conditions. The intersection of Hill Street & 11th Street operates at LOS A during both peak hours under existing conditions and would operate at LOS A during the AM peak hour and LOS B during the PM peak hour under cumulative conditions. The intersection of Broadway & Olympic Boulevard operates at LOS A during the AM peak hour and LOS B during the PM peak hour under existing conditions and would operate at LOS A during the AM peak hour and LOS D during the PM peak hour, under cumulative conditions. Worksite traffic control plans would be prepared for any temporary vehicle lane, parking lane, or sidewalk closures in accordance with applicable City and MUTCD guidelines.

Temporary Loss of Access

Pedestrian and vehicular access to properties located near the Project Site would be open and unobstructed for the duration of construction. Since the Project construction would not block any vehicle or pedestrian access to other parcels fronting the construction area, impacts would be less than significant.

Temporary Loss of Bus Stops or Rerouting of Bus Lines

A bus stop is located on Hill Street along the Project frontage that currently serves nine different local, limited, rapid, and shuttle bus services. This stop would need to be relocated during construction of the Proposed Project. Since many of the bus routes turn from Hill Street onto Olympic Boulevard or 11th Street, the bus stop might be relocated further south on the same block, just north of 11th Street, in order to minimize disruption and obviate rerouting. Doing so would require temporarily closing five additional on-street parking spaces on Hill Street, the significance of which is discussed below. There are no bus stops near the Project Site on Olympic Boulevard. With relocation of the bus stop on the same block, the construction impacts on transit operations would be less than significant.

Temporary Loss of On-Street Parking

Construction would require temporary parking restrictions along the project frontage of Hill Street to accommodate the construction area footprint. A total of four metered spaces would require temporary parking restrictions during this time, but could extend for the entire duration of construction. Additionally, in order to accommodate relocation of the bus stop from the project frontage to just north of 11th Street, five metered spaces would require parking restrictions during project construction. Per the provisions in the California Public Resources Code Section 21099, which implements SB 743, parking impacts of a

residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. As such, temporary parking impacts would be less than significant.

Construction Period Trip Generation

Based on the aforementioned information, a construction period trip generation analysis was conducted for each phase of construction to estimate daily, morning and evening peak hour passenger car equivalent (PCE) trips. Construction workers often travel to and from a worksite outside of the typical peak commute hours. For the purpose of the analysis, it was assumed that up to 40% of the construction workers would arrive during the peak morning commute hour and 40% would depart during the peak evening commute hour. Haul and delivery/equipment trucks were assumed to occur evenly throughout the 9-hour construction day. A PCE factor of 2.5 was used for vendor, haul, and delivery trucks.

On a peak construction activity day, a total of up to 940 daily PCE trips are estimated to occur, of which 166 PCE trips would occur during each of the morning and evening peak hours. As such, the peak construction activity would generate fewer daily and peak hour trips than are projected for the Project once it is completed and occupied.

Although significant construction impacts are not anticipated, the influx of this material and equipment could create less than significant impacts on the adjacent roadway network based on the following considerations:

1. There may be intermittent periods when large numbers of material deliveries are required, such as when concrete trucks would be needed for the parking garage and the buildings.
2. Some of the materials and equipment could require the use of large trucks (18-wheelers), which could create additional congestion on the adjacent roadways.
3. Delivery vehicles may need to park temporarily on adjacent roadways as they deliver their items. Based on experience, it is not uncommon for these types of deliveries to result in temporary lane closures.

Impacts related to construction traffic were found to be less than significant. In addition, the peak construction activity would generate fewer daily and peak hour trips than are projected for the Proposed Project once it is completed and occupied. While mitigation measures are not required to mitigate any significant impacts during construction, the Applicant has proposed to implement a construction management control plan as project design feature (see Mitigation Measure T-3, above). No further mitigation measures would be required.

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

Less Than Significant Impact. A significant impact would occur if the project conflicts with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads

or highways. The Transportation Impact Analysis presented in Appendix H to this SCEA included a regional transportation system impact analysis in accordance with the procedures outlined in Congestion Management Program for Los Angeles County (CMP) (Metro, 2010). The CMP requires that, when an environmental impact report is prepared for a project, traffic and transit impact analyses be conducted for select regional facilities based on the quantity of project traffic expected to use those facilities.

In addition, *Agreement Between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures* sets forth criteria for when a freeway impact analysis should be conducted. In December 2015, the City of Los Angeles and Caltrans District 7 signed an extension of the agreement and adjusted the ramp capacity to 850 vehicles per hour per lane for the freeway ramp screening analysis. LADOT determined as part of the traffic study memorandum of understanding for the project (see Appendix A) that the project would not meet these criteria for requiring a freeway impact analysis.

The CMP guidelines require that the first issue to be addressed is the determination of the geographic scope of the study area. The criteria for determining the study area for CMP arterial monitoring intersections and for freeway monitoring locations are:

- All CMP arterial monitoring intersections where the proposed project will add 50 or more trips during either the AM or PM peak hours of adjacent street traffic.

- All CMP mainline freeway monitoring locations where the proposed project will add 150 or more trips, in either direction, during either the AM or PM peak hours.

Significant Traffic Impact Criteria

The CMP traffic impact analysis guidelines establish that a significant project impact occurs when a certain threshold is exceeded. If the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$), a significant impact would occur. If the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$).

Arterial Monitoring Analysis

None of the study area intersections are CMP arterial monitoring locations. The CMP arterial monitoring station closest to the proposed project site is located at Wilshire Boulevard & Alvarado Street located approximately 1.5 miles northwest of the project site. Based on the project trip distribution and trip generation, the Project is not expected to add 50 peak hour vehicle trips through the CMP arterial monitoring station. Project trips are anticipated to disperse among the transportation network due to the extended distance between the project site and the monitoring station. The proposed project is not expected to add enough new traffic to exceed the arterial analysis criteria of 50 vehicle trips at the above-mentioned location. Therefore, no further CMP arterial analysis is required.

Freeway Analysis

Regional access to the project site is provided by the Interstate 10, State Route (SR) 110, and US-101 Freeways. Interstate 10 lies approximately 0.7 miles south of the site, State Route 110 lies approximately

0.7 miles to the west of the site, and US-101 lies approximately 1.5 miles northeast of the site. The CMP freeway monitoring stations closest to the project site include the I-10 Freeway at Budlong Avenue, SR 110 at the US-101 Freeway interchange, and US-101 Freeway north of Vignes Street.

Based on the project distribution patterns shown in Figure 5, approximately 5% of project traffic is expected to travel through all three monitoring stations. According to the trip generation estimates shown in Table VI-34, the project is projected to result in an increase of 12 trips in the morning peak hour and 14 trips in the evening peak hours at the monitoring stations. Since fewer than 150 trips would be added during the AM or PM peak hours in either direction at any of the freeway segments in the vicinity of the study area, no further analysis of the freeway segments is required for CMP purposes.

Regional Transit Impact Analysis

Potential increases in transit person trips generated by the proposed project were estimated. Appendix B-4 of the 2010 CMP provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the projected number of vehicle trips. This methodology assumes an average vehicle ridership (AVR) factor of 1.4 in order to estimate the number of person trips to and from the project and then provides guidance regarding the percentage of person trips assigned to public transit depending on the type of use (commercial/other versus residential) and the proximity to transit services. Appendix B-4 of the 2004 CMP recommends observing the fixed-route local bus services within ¼ mile of the project site and express bus routes and rail service within two miles of the project site.

The Project Site is served by a high level of public transit. The Project is located approximately one half-mile northeast of the Metro Pico Station and approximately 0.7 miles southeast of the 7th Street/Metro Center Station. Thirty-seven local, limited, express, rapid, and shuttle bus routes run within a ¼-mile of the project site, including: Metro local, Metro Rapid, Foothill Transit rapid, DASH, LADOT Commuter Express, and Big Blue Bus rapid routes. Additional details and maps of the transit service near the Project Site is provided in Appendix H.

As part of the trip generation estimates presented in Table VI-34, no transit credit was taken on the residential land use. A transit credit of 15% was taken, in consultation with LADOT, for the commercial land uses. Excluding the transit credit in Table VI-34, the proposed project would have an estimated increase in vehicle trip generation of approximately 242 net vehicle trips during the AM peak hour and 294 during the PM peak hour before the transit credit. Applying the AVR factor of 1.4 to the estimated vehicle trips would result in an estimated increase of approximately 339 and 412 person trips during the AM and PM peak hours, respectively. Applying the 15% transit trips, the project would generate an estimated increase of 51 transit trips during the AM peak hour and 62 transit trips during the PM peak hour. Given the frequency of the transit service in close proximity to the project site, the incremental transit riders resulting from the project are not anticipated to result in a significant impact on the transit lines serving the area.

Therefore, based on the analysis summarized above, the Proposed Project would not conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways and the project regional traffic impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project Site access or other features were designed in such a way as to create hazard conditions.

The Proposed Project would not include unusual or hazardous design features. Current vehicular access to the Project Site is provided by a full access driveways into the surface parking lot along Hill Street and Olympic Boulevard. The Proposed Project would retain the existing driveway along Hill Street and would provide an additional vehicle entrance through Blackstone Court. Additionally, the Proposed Project does not include any sharp curves, dangerous intersections, or incompatible uses. No offsite traffic improvements are proposed in the area surrounding the Project Site. As such, the Proposed Project would not include new vehicular access driveways that could potentially conflict with pedestrian circulation and traffic. Therefore, the Proposed Project would not substantially increase hazards due to design features or incompatible uses, and no impact would occur.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

As previously discussed in Section 8(h), the Proposed Project is not located on or near an adopted emergency response or evacuation plan. Development of the Project Site may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, the impacts would be less than significant.

As described in Section 14(a), the Proposed Project would satisfy the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project would be reviewed and approved by DOT. Furthermore, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and the impact would be less than significant.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 86 related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Central City Community Plan Area. As noted in Table VI-37 and Table VI-39, above, all increases in V/C ratios in

the AM peak hour and PM peak hour would be less than the threshold for a significant impact to occur and the Proposed Project's contribution to cumulative impacts is less than significant for all of the study intersections analyzed. Therefore, the Proposed Project's cumulative impact is considered less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	❑	❑	☒	❑
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	❑	☒	❑	❑

Mitigation Measures Incorporated from, or Consistent with, Mitigation Measures in the RTP/SCS EIR:

MM-TRI-1 Tribal Cultural Resources

- In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities[59], all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:
  a. Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1454.

[59] *Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity*

b. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
c. The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
d. The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
e. If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.
f. The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
g. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

PROJECT-SPECIFIC ANALYSIS

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

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?

Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a

proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

Less Than Significant with Mitigation Incorporated. As noted above, the Proposed Project would require excavations to a depth of approximately 80 feet below grade for the seven-level subterranean parking garage. As such, it is possible that unknown tribal cultural resources could be discovered on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

Public Resources Code Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." A project would cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or if such resource is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. PRC 5024.1(c) states that "[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in response to Checklist Question 5.b (Cultural Resources, Archeological Resources), the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[60] The Project Site is located in a highly urbanized area of the Central City Community Plan Area of the City of Los Angeles, and has been partially disturbed by past development activities along with associated control/maintenance of existing buildings. The Proposed Project includes subgrade preparation that would involve the excavation and export of approximately 206,100 cubic yards of soil. Thus, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, periodic monitoring during construction is required to identify any previously unidentified archaeological resources uncovered by Project construction activity. With the implementation of Regulatory Compliance Measures described in Section 5(b), potential impacts to archaeological resources would be less than significant.

[60] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

Additionally, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. Pursuant to the procedures imposed by AB 52, pre-consultation request letters were sent on December 1, 2017 to the local Native American Tribal representatives who are on file with the Department of City Planning as having requested to be notified of future development projects. The City of Los Angeles received one request from the Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleno Band) to consult. On January 18, 2018, the City of Los Angeles began the consultation process with the Gabrieleno Band by phone. No substantial evidence of a tribal cultural resource was provided at the time, but the Gabrieleno Band did request additional information from the City of Los Angeles on the historical uses, as well as the existing soil and geologic conditions, of the subject site. On February 2, 2018, the City of Los Angeles provided the requested information by email, and again requested substantial evidence, if any, of tribal cultural resource(s) on the site or in the surrounding area by February 16, 2018. No additional information of any kind was received from the Gabrieleno Band. Additionally, the lead agency requested a Sacred Lands File (SLF) Search through the Native American Heritage Commission (NAHC) on December 1, 2017. In response to the SLF Search, the NAHC provided a written response on December 15, 2017, concluding that a search of the SFL was completed for the project with negative results but recommending that the lead agency contact all of the listed Tribes. As noted, all of the listed Tribes have been contacted with AB 52 consultation request letters, and no substantial evidence of tribal cultural resources was received. Therefore, because the Project Site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, and the Native American Tribal Representative that requested consultation for the Project did not provide any substantial evidence, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Nevertheless, Mitigation Measure TRI-1, in combination with the regulatory compliance measures referenced above, has been included to address inadvertent discovery of tribal cultural resources to ensure that impacts to tribal cultural resources remain less than significant during Project construction.

Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

CUMULATIVE IMPACTS

Development of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to tribal cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate mitigation. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the construction or relocation of new or expanded water or wastewater treatment or storm drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	❑	❑	☒	❑
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	❑	❑	☒	❑
c. 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?	❑	❑	☒	❑
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment off solid waste reduction goals?	❑	❑	☒	❑
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	❑	❑	☒	❑

Regulatory Compliance Measures:

The following Regulatory Compliance Measures are required in conjunction with the Proposed Project.

- **Utilities (Low Impact Development Plan):** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

- **Utilities (Water):** As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase.

- **Utilities (Water):** The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of

water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

- **Utilities (Water):** The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20%. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.

- **Utilities (Solid Waste Recycling):**
  - *(Operational)* All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.
  - (*Operational*) Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.
  - (*Construction/Demolition*) Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
  - (*Construction/Demolition*) To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

PROJECT-SPECIFIC IMPACTS

a) Would the project require or result in the construction or relocation of new or expanded water or wastewater treatment or storm drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of water

supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[61] The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.

As part of the application process, the Applicant has submitted a water supply assessment to the LADWP to ensure there is adequate water supply available to serve the Proposed Project. As part of the WSA request, the Applicant has committed to implement the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project:

4. High Efficiency Toilets with flush volume of 1.0 gallons of water per flush
5. Energy Star Certified Clothes Washers (Residential) – water factor of 3.2 and capacity of 4.5 cu-ft, front loading
6. Showerheads with flow rate of 1.5 gallons per minute or less
7. Drought Tolerant Plants – 70% of total landscaping
8. Domestic Water Heating System located close proximity to point(s) of use
9. Individual Metering and billing for water use for every residential dwelling unit and commercial unit
10. Drip/Subsurface Irrigation (Micro-Irrigation)
11. Proper Hydro-zoning (groups plants with similar water requirements together) Zoned Irrigation

The Los Angeles Board of Water and Power Commissioners adopted the WSA for the Project at their August 15, 2017, meeting. A copy of the adopted Resolution No. 018 033 is included in Appendix J in the WSA.

The Applicant shall also comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181899 and No.183833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Project as feasible, pending final determination. With these measures, LADWP has sufficient supply to provide water for the Proposed Project.

As shown in Table VI-40 below, the Proposed Project would generate a net increase in water demand of approximately 80,392 gallons per day (gpd) of water (or 90 acre feet per year), significantly below available capacity. Because the Proposed Project is consistent with the zoning and General Plan land use designations, which form the basis for the LADWP's future year water demand and availability forecasts, and the Project's population growth is within SCAG's forecast, the Proposed Project's increased water demand would not measurably reduce the LAAFP's treatment capacity; therefore, no new or expanded

[61] *Los Angeles Department of Water and Power, website: http://wsoweb.ladwp.com/Aqueduct/historyoflaa/waterquality.htm, accessed May 2017.*

water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.

Table VI-40
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand
Existing Uses			
Surface Parking Lot and Driveway	50,617 sf	0 gpd/sf	0
Proposed Project			
Residential Units (700 total du)			
Studio	140 du	90 gpd/du	12,600 gpd
One Bedroom	352 du	132 gpd/du	46,464 gpd
Two-Bedroom	203 du	180 gpd/du	36,540 gpd
Three-Bedroom	5 du	228 gpd/du	1,140 gpd
Landscape	--	--	453 gpd [b]
Commercial			
Retail	7,000 sf	30 gpd/sf	210 gpd
Restaurant	8,000 sf	36 gpd/seat	19,188 gpd
		Baseline Additional Water Demand:	**116,595** gpd
		Water Conservation Reduction [c]	**31%**
		Net Water Demand	**80,392 gpd (90 AF/Y)**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] *Consumption Rates based on 120% of the City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*
[b] *The Landscape Water Budget was provided by Carter, Romanek Landscape Architects Inc., which assumes approximately 165,415 gallons per year.*
[c] *Pursuant to LADWP Resolution No. 018033, LADWP determined that the Proposed Project's net increase in water demand would be 90 acre feet with implementation of the developer's water conservation commitments. See Appendix J to this SCEA.*
Parker Environmental Consultants, 2017.

Based on communication from the LADWP, the Project Site is currently serviced by a 24" main along the south side of Olympic Boulevard. The static water pressure in the main ranges from 68 psi to 69 psi. LADWP approved a proposed service line off this water main along the east side of Hill Street. With approval of a main line extension, LADWP would be able to provide the required fire flow for the Proposed Project.[62] The water system would be verified again at the time of construction. In the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would

[62] *City of Los Angeles, Los Angeles Department of Water and Power, written correspondence re: Fire Service Pressure Flow Report, May 1, 2017 (See Appendix K, Will Serve Letters, to this SCEA).*

not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

The Los Angeles Bureau of Sanitation (BOS) provides sewer service to the Proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.[63] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table VI-41, the Proposed Project would generate a net increase of approximately 66,993 gpd of wastewater, representing a fraction of one percent of the available capacity.

Based on communication from the BOS, the Project Site is served by an existing 24-inch sewer pipe along Hill Street and an 8-inch sewer pipe along Olympic Boulevard. Based on the Sewer Capacity Availability Report, the sewer lines serving the project are adequate to serve the Proposed Project, with 50% of the discharge allocated to the Hill Street sewer line and 50% of the discharge allocated to the Olympic Boulevard sewer line.[64] Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the BOS will re-verify the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. If it is later determined that the local sewer system has insufficient capacity to serve the Proposed Project, the Applicant would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Proposed Project's increased flows. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized

[63] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=t4yrq0jkq_4&_afrLoop=10780400868530458#!, accessed May 2017.*

[64] *Sewer Capacity Availability Request (SCAR) for 220 & 226 W. Olympic Blvd./1000-1022 S. Hill Street, ID# 61-3709-0517, 05/31/2017.*

Table VI-41
Proposed Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Existing Uses			
Surface Parking Lot and Driveway	50,617 sf	0 gpd/sf	0
Proposed Project			
Residential Units (700 total du)			
Studio	140 du	75 gpd/du	10,500
One Bedroom	352 du	110 gpd/du	38,720
Two-Bedroom	203 du	150 gpd/du	30,450
Three-Bedroom	5 du	190 gpd/du	950
Commercial			
Retail	7,000 sf	25 gpd/sf	175
Restaurant (533 seats)	8,000 sf	30 gpd/seat	16,000
		Baseline Wastewater Generation:	**96,795**
		Water Conservation Reduction [b]	**31%**
		Net Wastewater Generation	**66,993 gpd**
		Allowed Wastewater Generation per SCAR Letter [c]	**88,510 gpd**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*
[b] *Pursuant to LADWP Resolution No. 018033, LADWP determined that the Proposed Project's net increase in water demand would be 90 acre feet with implementation of the developer's water conservation commitments.*
[c] *Sewer Capacity Availability Request (SCAR) for 220 & 226 W. Olympic Blvd./1000-1022 S. Hill Street, 05/31/2017, updated 06/27/2017.*
Parker Environmental Consultants, 2017.

in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Impacts to sewer capacity and infrastructure would be less than significant. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

Stormdrains

The Project Site is currently developed with a surface parking lot. The Project Site is completely covered with impervious surfaces. Thus, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Existing storm drain lines serving the Project Site are located along Hill Street and Olympic Boulevard. Stormwater flows south along Hill Street and onto stormwater inlets on the corner of Hill Street and 11th Street. Stormwater along Olympic Boulevard flows eastbound and onto stormwater inlets on the corner of Olympic Boulevard and Broadway.[65] These storm drain lines are owned and maintained by the City of Los Angeles.

[65] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, March 2017.*

The Proposed Project would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. The Proposed Project's potential impacts to storm drain capacity would be reduced to a less than significant level by incorporating stormwater pollution control measures as set forth below that would reduce the amount of stormwater leaving the Project Site.

Electricity and Natural Gas

As discussed in response to VI, Energy, electricity and natural gas are provided by the LADWP and Southern California Gas, respectively. Adequate electricity and natural gas service and supplies are available in the immediate project vicinity and would be provided to the Project Site. The availability of electricity and natural gas is dependent upon adequate generating capacity, adequate fuel supplies, and a reliable distribution system. The estimated power requirement for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. Construction and operation of the Proposed Project would not necessitate the construction of off-site facilities or infrastructure improvements that would have the potential to cause significant environmental impacts. As such, project impacts would be less than significant.

Telecommunications

Adequate telecommunications services exist within in the immediate project vicinity and would be provided to the Project Site based on demand. Construction and operation of the Proposed Project would not necessitate the construction of off-site telecommunication facilities that would have the potential to cause significant environmental impacts. As such, project impacts to telecommunication facilities would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Proposed Project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on

population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table VI-40, the Proposed Project's net increase in water demand would be 80,392 gallons per day. The Proposed Project would be consistent with the allowable land uses and density that are planned for the Project Site under the zoning and General Plan and is therefore within the growth projections of SCAG's RTP/SCS. Accordingly, the Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184248, Los Angeles Ordinance No. 184,692, the 2017 Los Angeles Plumbing Code, the 2016 California Green Building Standards Code (CAL Green) and the 2017 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance.[66] Compliance with the regulatory compliance measures identified above would reduce the Proposed Project's demands for potable water resources to a less than significant level.

c) 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained

[66] *Ibid.*

or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in Checklist Question 18(b), above, the sewage flow would ultimately be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project. Therefore, impacts would be less than significant.

f) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment off solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.[67] State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[68]

Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise

[67] *City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.*

[68] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

system for the collection, transportation and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 72.6 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 22 years. The Chiquita Canyon Landfill has a remaining capacity of 758,146 tons.[69] For the past decade, Chiquita Canyon Landfill has been working with the County of Los Angeles on an Environmental Impact Report (EIR) and a new Conditional Use Permit (CUP) application. During this period, the Chiquita Canyon Landfill reached the permitted disposal limit of 23 million tons that was approved in 1997. The Director of Regional Planning granted Chiquita Canyon Landfill a limited waiver to continue operation of the landfill until necessary public hearings for the EIR and new CUP are completed. If the new CUP is not approved, then the landfill would close. The Proposed Project would be allowed to dispose solid waste at the Chiquita Canyon Landfill during the EIR and CUP process given that the landfill would not be required to close.[70] An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 48,114,000 tons (a 45-year life expectancy based on 2015 average daily disposal of 3,446 tons per day or 15 years based on the maximum permitted rate of disposal of 10,000 tons per day).[71]

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. It is estimated that the demolition and construction for the Proposed Project would generate approximately 2,563 tons of debris during the demolition and construction process (see Table VI-42). In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent.

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[69] *County of Los Angeles Department of Public Works, 2015 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, December 2016.*

[70] *Chiquita Canyons, "Chiquita Canyon Granted Waiver, Continues Operations" August 5, 2016. Website: http://chiquitacanyon.com/chiquita-canyon-granted-waiver-continues-operations/, accessed May 2017.*

[71] *Ibid.*

Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Bureau of Sanitation.

Table VI-42
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate [a] [b]	Generated Waste (tons)
Demolition			
Paved Surface Parking Lot (50,617 sf) [c]	938 cy	2,400 lbs/cy	1,126
Construction			
Multi-Family Residential	643,021 sf	4.38 lbs/sf	1,408
Commercial / Retail Spaces	15,000 sf	3.89 lbs/sf	29
		Total Debris:	**2,563 tons**

Notes:
sf = square feet; lbs = pounds
1. *CalRecycle, Solid Waste Cleanup Program Weights and Volumes for Project Estimates, http://www.calrecycle.ca.gov/swfacilities/cdi/Tools/Calculations.htm, accessed May 2017.*
2. *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.*
3. *Assumed that the parking lot is 0.5-feet in depth.*

Source: Parker Environmental Consultants, 2017.

As shown in Table VI-43, Proposed Project Operational Solid Waste Generation, the Proposed Project's net generation during operation would be 9,319 pounds per day. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills and Project impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

g) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an

Table VI-43
Proposed Project Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses			
Surface Parking	50,617 sf	0 lbs/sf/day	0
Proposed Project			
Multi-Family Residential	700 du	12.23 lbs/du/day	8,561
Restaurant/retail (15,000 sf)	72 emp [b]	10.53 lbs/employee/day	758
		NET TOTAL Solid Waste Generation:	**9,319**

Notes: sf =square feet; du = dwelling units, emp = employee
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on 1 employee per 588 square feet community retail and 1 employee per 143 square feet of restaurant space. Source: U.S. Green Building Code, Building Area per Employee by Business Type Table, May 13, 2008.*
Source: Parker Environmental Consultants, 2017.

ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California's recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-

site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required.

CUMULATIVE IMPACTS

Wastewater

Development of the Proposed Project in conjunction with the related projects would further increase regional demands on the HWRP's capacity.

Similar to the Proposed Project, each related project would be required to submit a SCAR and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the SCAR for the Proposed Project was approved, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable.

The Integrated Resources Plan, adopted in 2006, incorporates a new City-prepared Wastewater Facilities Plan to address demand and capacity through 2020. The Integrated Resources Plan serves to update the information prepared in the 1991 Wastewater Facilities Plan, while also considering the needs of the City's recycled water and urban runoff systems. Specifically, the Integrated Resources Plan was developed to accommodate the projected increase in wastewater flow over the next 20 years while maximizing the beneficial reuse of recycled water and urban runoff and, as a result, optimizing the use of the City's existing facilities and water resources. Growth projections and data sources used in the Integrated Resources Plan were based on the Southern California Association of Governments (SCAG) 2001 Regional Transportation Plan, which estimated that the population of Los Angeles would reach almost 4.3 million people by 2020. Implementation of the Integrated Resources Plan will enable the City to adequately convey wastewater to the treatment plants with minimal potential for sewage spills. It will also enable the City to treat future wastewater flows while protecting public health and safety and meeting regulatory requirements, thereby protecting the environment and surface waters. As discussed in Section 13, Population and Housing, the cumulative growth impacts for the Proposed Project and related projects are consistent with the SCAG's growth projections.

Based on continued implementation of the Integrated Resources Plan and the anticipated cumulative wastewater generation forecasted for the region, the demands of the Proposed Project and related projects in relation to wastewater treatment, when considered cumulatively, would result in less than significant impacts.

Water

Development of the Proposed Project, related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management.

This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed previously in Section 13, Population and Housing, the Proposed Project's population growth is consistent with SCAG's growth projections for the City of Los Angeles subregion. The Proposed Project is consistent with the underlying allowable uses per the Central City Community Plan and the LAMC and would not exceed the allowable density for the Project Site. As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 Urban Water Management Plan.

Stormwater

*D*evelopment of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles and could further increase regional demands on stormwater facilities. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As discussed earlier, stormwater on each related project site would be collected on their respective site, retained and treated in compliance with Article 4.4 of Chapter VI of the LAMC, and directed towards existing storm drains. As a result of the requirements under Article 4.4 of Chapter VI of the LAMC, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to retain the first ¾ inches of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Therefore, the Proposed Project and related projects would not result in cumulative stormwater impacts.

Solid Waste

Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2015 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2030 will not exceed the 2015 remaining permitted Class III landfill capacity of 114 million tons.[72] However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan – Los Angeles County – Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure

[72] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

Furthermore, it should be noted that the City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 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 Proposed Project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE.

As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[73] Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and 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. 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. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Therefore, the Proposed Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	❑	❑	❑	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	❑	❑	❑	☒

[73] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	❑	❑	❑	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	❑	❑	❑	☒

a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope, prevailing winds, and other factors, would the Project exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?

c) Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d) Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact (Responses a through d). The Project Site is located in an urbanized area with no natural vegetation. The Project Site is improved with a surface parking lot. There are no state responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site.[74] Therefore, this checklist question is not applicable to the Proposed Project and no impact would occur.

MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife	❑	❑	❑	☒

[74] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed February 2019.*

population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	❑	❑	☒	❑
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	❑	☒	❑	❑

PROJECT-SPECIFIC IMPACTS

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

No Impact. A significant impact may occur only if the Proposed Project would have an identified potentially significant impact for any of the above issues. The Proposed Project is located in a highly urbanized area, development of the Project would result in a less than significant impact to biological and cultural resources with adherence to regulatory compliance measures. The Proposed Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with the other 111 related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As concluded in this analysis, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, tribal cultural resources, and utilities and service systems would be less than significant. As such, the Proposed Project's contribution to cumulative impacts would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less-than-significant levels through the implementation of the applicable mitigation measures identified within this SCEA analysis.