1001 Olympic (Olympia) Project

Case Number: ENV-2016-4889-EIR

Project Location: 911-955 South Georgia Street; 1000-1016 West James M. Wood Boulevard; 936-950 South Bixel Street; 1013-1025 West Olympic Boulevard, Los Angeles, CA 90015

Community Plan Area: Central City

Council District: 14—Huizar

Project Description: The Project would demolish the existing medical office, urgent care facility, and associated surface parking lot area on the approximately 3.26-acre Project Site and would construct a mixed-use development located in the South Park neighborhood of Downtown Los Angeles. The Project would consist of three (3) high-rise towers (65-story, 43-story, and 53-story), including a four-story podium connecting all three towers. The Environmental Impact Report (EIR) will analyze two development scenarios, “Option 1” and “Option 2”:

- **Option 1**: The Project would include up to 1,367 residential units and up to 40,000 square feet of commercial space (restaurant, retail, and other commercial uses).
- **Option 2**: The Project would include up to 1,000 hotel rooms, 879 residential units, and up to 40,000 square feet of commercial space (restaurant, retail, and other commercial uses).

The Project would include up to 1,845,831 square feet of total floor area, have a maximum height of 853 feet above ground level, and a proposed Floor Area Ratio (FAR) of 13:1. The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4) and has a Community Plan designation of Regional Center Commercial. In accordance with the requirements of the LAMC, the Project would include approximately 163,015 square feet of open space areas and recreational amenities (under Option 1, which would require more open space than Option 2). The Project would provide 2,131 parking spaces and 1,548 bicycle parking spaces (under Option 1, which would require more vehicle and bicycle parking than Option 2), located in five (5) subterranean levels and three (3) above-ground parking levels. A Sign District is proposed for the Project Site.

**PREPARED FOR:**
The City of Los Angeles
Department of City Planning

**PREPARED BY:**
CAJA Environmental Services

**APPLICANT:**
LA Gateway, LLC

**October 2017**
# TABLE OF CONTENTS

## Initial Study

**Environmental Checklist** ........................................................................................................... IS-1

**Attachment A: Project Summary** ................................................................................................. A-1

A. Environmental Setting ................................................................................................................ A-2
   1. Project Location .................................................................................................................. A-2
   2. Existing Uses .................................................................................................................... A-2
   3. Surrounding Land Uses ................................................................................................... A-4

B. Description of the Project ............................................................................................................ A-5
   1. Project Overview ............................................................................................................. A-5
   2. Building Design ............................................................................................................... A-7
   3. Open Space and Recreational Amenities ......................................................................... A-7
   4. Signage and Lighting ....................................................................................................... A-10
   5. Access, Circulation, and Public Transportation ............................................................ A-11
   6. Parking ............................................................................................................................ A-12
   7. FAR and Setbacks .......................................................................................................... A-14
   8. Sustainability Features .................................................................................................... A-15

C. Project Construction and Scheduling ......................................................................................... A-16

D. Necessary Approvals .................................................................................................................. A-16

**Attachment B: Initial Study Checklist** ......................................................................................... B-1

I. Aesthetics ................................................................................................................................... B-1

II. Agricultural and Forestry Resources ....................................................................................... B-5

III. Air Quality ............................................................................................................................... B-6

IV. Biological Resources ............................................................................................................... B-9

V. Cultural Resources ................................................................................................................... B-12

VI. Geology and Soils ..................................................................................................................... B-19

VII. Greenhouse Gas Emissions .................................................................................................... B-23

VIII. Hazards and Hazardous Materials ...................................................................................... B-23

IX. Hydrology and Water Quality ............................................................................................... B-27

X. Land Use and Planning ............................................................................................................ B-31

XI. Mineral Resources ................................................................................................................ B-32

XII. Noise ..................................................................................................................................... B-34

XIII. Population and Housing ........................................................................................................ B-36

XIV. Public Services ...................................................................................................................... B-37

XV. Recreation ............................................................................................................................. B-40

XVI. Transportation/Traffic .......................................................................................................... B-41

XVII. Tribal Cultural Resources .................................................................................................... B-43

XVIII. Utilities ............................................................................................................................... B-45

XIX. Mandatory Findings of Significance ..................................................................................... B-47
List of Tables

1. Project Site Information ................................................................. A-4
2. Summary of Proposed Uses .......................................................... A-6
3. Open Space .................................................................................. A-8
4. Vehicle Parking .......................................................................... A-12
5. Bicycle Parking .......................................................................... A-13

List of Figures

A-1. Vicinity Map ........................................................................... A-18
A-3. Conceptual Site Plan ............................................................... A-20
A-4. Project Elevations – Option 1 ................................................ A-21
A-5. Project Elevations – Option 2 ................................................ A-22
A-6. Proposed Signage 1 ................................................................. A-23
A-7. Proposed Signage 2 ................................................................. A-24
A-8. Proposed Signage 3 ................................................................. A-25
A-9. Transit Priority Area ............................................................... A-26

Appendices

A. Tree Report
B. Phase I Environmental Site Assessment
CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
AND APPENDIX G CHECKLIST

LEAD CITY AGENCY
City of Los Angeles Department of City Planning

COUNCIL DISTRICT
14—Huizar

DATE
October 5, 2017

RESPONSIBLE AGENCIES
Including, but not limited to, the California Department of Transportation (Caltrans), California Regional Water Quality Control Board (RWQCB), and South Coast Air Quality Management District (SCAQMD).

PROJECT TITLE/NO.
1001 Olympic (Olympia)

CASE NOS.
ENV-2016-4889-EIR,
CPC-2016-4888-TDR-SN-MCUP-SPR,
VTT-74868, CPC-2017-3051-DA

PROJECT LOCATION
911-955 South Georgia Street; 1000-1016 West James M. Wood Boulevard; 936-950 South Bixel Street; 1013-1025 West Olympic Boulevard, Los Angeles, CA 90015

APPLICANT NAME AND ADDRESS
LA Gateway, LLC
865 S. Figueroa Street, Suite 2760, Los Angeles, California 90017

PHONE NUMBER
(213) 265-7328

PROJECT DESCRIPTION:
The Project would demolish the existing medical office and urgent care facility, and associated surface parking lot area on the approximately 3.26-acre Project Site and would construct a mixed-use development located in the South Park neighborhood of Downtown Los Angeles. The Project would consist of three (3) high-rise towers (65-story, 43-story, and 53-story), including a four-story podium connecting all three towers. The Environmental Impact Report (EIR) will analyze two development scenarios, "Option 1" and "Option 2":

- **Option 1**: The Project would include up to 1,367 residential units and up to 40,000 square feet of commercial space (restaurant, retail, and other commercial uses).
- **Option 2**: The Project would include up to 1,000 hotel rooms, 879 residential units, and up to 40,000 square feet of commercial space (restaurant, retail, and other commercial uses).

The Project would include up to 1,845,831 square feet of total floor area, have a maximum height of 853 feet above ground level, and a proposed Floor Area Ratio (FAR) of 13:1. The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4) and has a Community Plan designation of Regional Center Commercial. In accordance with the requirements of the LAMC, the Project would include approximately 163,015 square feet of open space areas and recreational amenities (under Option 1, which would require more open space than Option 2). The Project would provide 2,131 parking spaces and 1,548 bicycle parking spaces (under Option 1, which would require more vehicle and bicycle parking than Option 2), located in five (5) subterranean levels and three (3) above-ground parking levels. A
Sign District is proposed for the Project Site (For additional detail, see Attachment A).

ENVIRONMENTAL SETTING:

The Project Site is located at the western end of the Central City Community Plan Area and within the South Park district of the City. Surrounding uses in the vicinity of the Project Site are developed with commercial, retail, restaurant, and entertainment uses (L.A. Live, Staples Center, the Microsoft Theater, and the LA Convention Center). The Project Site is specifically bounded on the north by State Route 110 (SR-110 or Harbor Freeway) and James M. Wood Boulevard, on the east by Georgia Street, on the south by Olympic Boulevard, and on the west by Bixel Street. Immediately to the west of the Project across Bixel Street is a car rental business/one-story commercial building, to the south is the Regal Cinemas LA Live; to the southeast is the 54-story Ritz-Carlton Residences and JW Marriott; to the east of the Project Site is a surface parking lot and multiple structures, including a one-story commercial building and a three-story apartment building directly across on Georgia Street, and the Residence Inn Marriott Los Angeles and a four-story office building located along Francisco Street. Beyond these land uses in the Project vicinity are mid/high-rise mixed-use residential developments. Major arterials providing regional access to the Project vicinity include Olympic Boulevard, Figueroa Street, and James M. Wood Boulevard. The Project Site is located in a Transit Priority Area, as it is within a half-mile of major transit stations (Metro 7th Street/Metro Center and Pico Stations). To accommodate the new uses, the two-story, 43,892 square-foot existing medical office and urgent care facility, and associated surface parking lot area would be demolished. (For additional detail, see Attachment A).

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? Yes.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities/Service Systems
- Mandatory Findings of Significance
DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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

Jon Chang
PRINTED NAME

Planning Assistant
TITLE

SIGNATURE

(213) 978-1914
TELEPHONE NUMBER
EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to a project like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

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

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).

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

   1) Earlier Analysis Used. Identify and state where they are available for review.
   2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

3) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9) The explanation of each issue should identify:

   1) The significance criteria or threshold, if any, used to evaluate each question; and
   2) The mitigation measure identified, if any, to reduce the impact to less than significance.
I. AESTHETICS. Would the project:
   a. Have a substantial adverse effect on a scenic vista?
   b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state-designated scenic highway?
   c. Substantially degrade the existing visual character or quality of the site and its surroundings?
   d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

II. AGRICULTURAL AND FOREST RESOURCES
   In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest Range and Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:
   a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
   b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?
   c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 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
### III. AIR QUALITY.

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

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard including releasing emissions which exceed quantitative thresholds for ozone precursors</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>d. Expose sensitive receptors to substantial pollutant concentrations?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>e. Create objectionable odors affecting a substantial number of people?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### IV. BIOLOGICAL RESOURCES.

Would the project:

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
V. CULTURAL RESOURCES: Would the project:
   a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?
      ☐ ☐ ☐ ☑
   b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?
      ☑ ☐ ☐ ☐
   c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
      ☑ ☐ ☐ ☐
   d. Disturb any human remains, including those interred outside of dedicated cemeteries?
      ☑ ☐ ☒ ☒

VI. GEOLOGY AND SOILS. Would the project:
   a. Exacerbate existing environmental conditions so as to increase the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:
      i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
         ☑ ☐ ☐ ☐
      ii. Strong seismic ground shaking?
         ☑ ☐ ☒ ☒
      iii. Seismic-related ground failure, including liquefaction?
         ☑ ☒ ☐ ☒
      iv. Landslides?
         ☐ ☐ ☒ ☒
   b. Result in substantial soil erosion or the loss of topsoil?
      ☑ ☐ ☒ ☒
   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 the 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 waste disposal systems?
      ☑ ☐ ☐ ☒
water disposal systems where sewers are not available for the disposal of waste water?

VII. GREENHOUSE GAS EMISSIONS. Would the project:
   a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?  
   b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

VIII. HAZARDS AND HAZARDOUS MATERIALS.
Would the project:
   a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
   b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
   c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
   d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, has the potential to exacerbate the current environmental conditions so as to 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 have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?
   f. For a project within the vicinity of a private airstrip, would the project have the potential to exacerbate current environmental conditions so as to result in a safety hazard for the people residing or working in the area?
   g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
   h. Exacerbate existing environmental conditions so as to increase the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires,
including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

IX. HYDROLOGY AND WATER QUALITY. Would the project:

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

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

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

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

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

f. Otherwise substantially degrade water quality?

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

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

i.Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?

j. Inundation by seiche, tsunami, or mudflow?

X. LAND USE AND PLANNING. Would the project:

a. Physically divide an established community?

b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not
<table>
<thead>
<tr>
<th>minimized to the general plan, specific plan,</th>
<th>Less Than Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>c. Conflict with any applicable habitat conservation plan or natural community conservation plan?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

**XI. MINERAL RESOURCES**

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? | ☐ | ☐ | ☐ | ☑ |

**XII. NOISE.** Would the project result in:

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

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

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

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

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

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

**XIII. POPULATION AND HOUSING.** Would the project:

a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☑ | ☐ | ☐ | ☑ |

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

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☑ |
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

<table>
<thead>
<tr>
<th>Service</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Fire protection?</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>b. Police protection?</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>c. Schools?</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>d. Parks?</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>e. Other public facilities?</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
</tbody>
</table>

XV. RECREATION.

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

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

XVI. TRANSPORTATION/TRAFFIC: Would the project:

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

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

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>

e. Result in inadequate emergency access?

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>

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

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>

XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>❏</td>
<td>❏</td>
<td>❏</td>
<td>❏</td>
</tr>
</tbody>
</table>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

XIV. MANDATORY FINDINGS OF SIGNIFICANCE.

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

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).

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>
INITIAL STUDY
Attachment A: Project Description

Project Summary

The approximately 3.26 acre Project Site (141,987 square feet) is located at the northwest corner of the intersection of Olympic Boulevard and Georgia Street in the South Park district of Downtown Los Angeles. The Project would consist of three (3) high-rise towers (65-story, 43-story, and 53-story), including a four-story podium connecting all three towers. The Project would include up to 1,845,831 square feet of total floor area, have a maximum height of 853 feet above ground level, and a proposed Floor Area Ratio (FAR) of 13:1. The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4) and has a Community Plan designation of Regional Center Commercial.

The Project Site is currently developed with a two-story, 43,892 square-foot medical office use and urgent care facility, and surrounding surface parking lots. The Project proposes to remove the existing medical office and urgent care facility, and associated surface parking lot area and construct a new mixed-use residential and commercial development. The Environmental Impact Report (EIR) will analyze two development scenarios, “Option 1” and “Option 2”:

- **Option 1**: The Project would include up to 1,367 residential units and up to 40,000 square feet of commercial space (restaurant, retail, and other commercial uses).
- **Option 2**: The Project would include up to 1,000 hotel rooms, 879 residential units, and up to 40,000 square feet of commercial space (restaurant, retail, and other commercial uses).

In accordance with the requirements of the LAMC, the Project would include approximately 163,015 square feet of open space areas and recreational amenities (under Option 1, which would require more open space than Option 2). The Project would include 2,131 parking spaces and 1,548 bicycle parking spaces (under Option 1, which would require more vehicle and bicycle parking than Option 2), located in five (5) subterranean levels and three (3) above-ground parking levels. A Sign District is proposed for the Project Site.
A. Environmental Setting

1. Project Location

The Project Site is located at the western end of the Central City Community Plan (CCCP) Area and within the South Park district of the City of Los Angeles. The approximately 3.26 acre (141,987 square feet) Project Site is specifically bounded on the north by State Route 110 (SR-110 or Harbor Freeway) and James M. Wood Boulevard, on the east by Georgia Street, on the south by Olympic Boulevard, and on the west by Bixel Street. Immediately to the west of the Project Site across Bixel Street is a car rental business/one-story commercial building, to the south is the Regal Cinemas LA Live; to the southeast is the 54-story Ritz-Carlton Residences and the JW Marriott; to the east of the Project Site is a surface parking lot and multiple structures, including a one-story commercial building and a three-story apartment building directly across on Georgia Street, and a Residence Inn Marriott and a four-story office building located along Francisco Street. Major arterials providing regional access to the Project vicinity include Olympic Boulevard, Figueroa Street, and James M. Wood Boulevard. The Project Site is located in a Transit Priority Area, as it is within a half-mile of major transit stations (Metro 7th Street/Metro Center and Pico Stations).

The Project Site is approximately two miles northwest of the City of Vernon boundary south of Washington Boulevard and is approximately 3.5 miles west of the unincorporated Los Angeles County (East Los Angeles area) boundary at Indiana Street. See Figure 1, Vicinity Map, for the location within the context of the City. Beyond these land uses in the Project vicinity are mid/high-rise mixed-use residential developments. See Figure 2, Aerial Map, for the Project Site and immediate surrounding areas.

2. Existing Uses

a. Existing Conditions

The Project Site is currently developed with a two-story 43,892 square-foot medical office building and urgent care facility, and surrounding surface parking lots. To accommodate the new uses, the existing medical office building, urgent care facility, and surface parking lot would be demolished. According to the tree report prepared for the Project Site (included as Appendix A to this Initial Study), there are 69 trees currently on the Project Site, including four western sycamore trees (which meet the City’s minimum size threshold for regulation as protected trees), 41 non-protected trees, 18 palms that may
be considered as non-protected trees, and six street trees that are greater than eight inches diameter at breast height (dbh). The Project would remove all existing trees. The replacement of street trees is described in Attachment B, Checklist Item IV(e).

b. Land Use and Zoning

The Project Site is located at the western end of the Central City Community Plan (CCCP) Area. The CCCP area is in Downtown Los Angeles. The City is currently in the process of updating the Community Plan. Under the adopted Community Plan, which was last updated in January 2003, the Project Site has a General Plan land use designation of Regional Center Commercial. The plan area is bounded by Sunset Boulevard/Cesar Chavez Avenue to the north; Alameda Street to the east; the Santa Monica Freeway (Interstate 10) to the south; and State Route 110 (SR-110 or Harbor Freeway) to the west. The eastern edge of the approximately 2-mile wide by 2-mile long plan area is on the eastern edge of downtown Los Angeles, while the western edge abuts the western side of downtown Los Angeles. The CCCP area is surrounded by the City of Los Angeles community plan areas of Central City North to the north and the east; Southeast Los Angeles to the south; and both Westlake and South Los Angeles to the west.

The Project Site’s assessor parcel numbers (APN), zoning, land use designation, and lot size are listed on Table 1. The total area that composes the Project Site is approximately 141,987 square feet (or approximately 3.26 acres). The entire Project Site is zoned by the Los Angeles Municipal Code as C2-4D (Commercial, Height District No. 4 with Development Limitation) and is designated Regional Center Commercial by the CCCP. The C2 zone permits a wide range of land uses, including retail stores, offices, hotels, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone. Height District No. 4 within the C2 zone does not impose any height limit with an allowable maximum Floor Area Ratio (FAR) of 13:1. While Height District No. 4 permits a Floor Area Ratio (FAR) of 13:1, the maximum permitted area of the Project Site is restricted by the “D” limitation, which limits the FAR to 6:1 without a Transfer of Floor Area Rights (TFAR), per Ordinance 164,307. An FAR of 6:1 permits a total floor area of approximately 851,922 square feet.

The Project Site is located within the Los Angeles State Enterprise Zone (ZI-2374), the Greater Downtown Housing Incentive Area (ZI-2385), the Downtown Parking District (ZI-2385), the City Center Redevelopment Project Area, the Convention Center/Arena Sphere of Influence, the Los Angeles Sports and Entertainment District (LASED) Streetscape Plan, Adaptive Reuse Incentive Area, the Central City Parking District, bordering on and directly adjacent to the LASED Specific Plan area, is located within a Freeway Adjacent Advisory Area for Sensitive Uses (applicable to all properties within 1,000 feet of a freeway within the City of Los Angeles), and is subject to the City of LA
Downtown Design Guide: Urban Design Standards. Based on the map attached to City Zoning Information File No. 2452, the Project Site is located within a Transit Priority Area.

### Table 1
**Project Site Information**

<table>
<thead>
<tr>
<th>Address</th>
<th>APN</th>
<th>Zoning</th>
<th>Land Use Designation</th>
<th>Size (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1025 Olympic, 950 Bixel</td>
<td>5138-006-023</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>9,132.3</td>
</tr>
<tr>
<td>1015 Olympic</td>
<td>5138-006-014</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>8,910.0</td>
</tr>
<tr>
<td>1013 Olympic, 955 Georgia</td>
<td>5138-006-009</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>7,868.3</td>
</tr>
<tr>
<td>951 Georgia</td>
<td>5138-006-008</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>7,660.6</td>
</tr>
<tr>
<td>947 Georgia</td>
<td>5138-006-007</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>7,658.5</td>
</tr>
<tr>
<td>941 Georgia</td>
<td>5138-006-007</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>7,658.6</td>
</tr>
<tr>
<td>929, 933, 937 Georgia</td>
<td>5138-006-020</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>20,707.3</td>
</tr>
<tr>
<td>None</td>
<td>5138-006-024</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>6,152.2</td>
</tr>
<tr>
<td>1000, 1004, 1016 James M. Wood; 911, 921 Georgia</td>
<td>5138-006-024</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>33,153.0</td>
</tr>
<tr>
<td>936 Bixel</td>
<td>5138-006-021</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>26,632.8</td>
</tr>
<tr>
<td>940, 942, 944 Bixel</td>
<td>5138-006-022</td>
<td>C2-4D</td>
<td>Regional Center Commercial</td>
<td>6,453.4</td>
</tr>
<tr>
<td><strong>TOTAL:</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>141,987</strong></td>
</tr>
</tbody>
</table>


3. **Surrounding Land Uses**

Surrounding uses in the vicinity of the Project Site are developed with commercial, retail, restaurant, and entertainment uses (L.A. Live, Staples Center, the Microsoft Theater, and the Los Angeles Convention Center).

- To the east of the Project across Georgia Street is a surface parking lot, and multiple structures, including a one-story commercial building and a three-story apartment building directly across on Georgia Street, and the Residence Inn Marriott Los Angeles and a four-story office building located along Francisco Street.
• Immediately to the south of the Project, across Olympic Boulevard, is the Regal
  Cinemas movie theater at L.A. Live. To the southeast (at the southeast corner of
  Georgia Street and Olympic Boulevard) are the 54-story Ritz-Carlton Residences and
  the JW Marriott, both also part of L.A. Live.

• To the west of the Project across Bixel Street is a car rental business/one-story
  commercial building, and further west is the State Route 110 (SR-110 or Harbor
  Freeway).

• To the north of the Project across James M. Wood Boulevard is an off-ramp from the
  State Route 110 (SR-110 or Harbor Freeway) and the Interstate-10 freeway.

B. Description of the Project

1. Project Overview

   The Project would demolish the existing medical office, urgent care facility, and
   associated surface parking lot area on the approximately 3.26-acre Project Site and would
   construct a mixed-use development located in the South Park neighborhood of Downtown
   Los Angeles. The Project would consist of three (3) high-rise towers (65-story ‘Tower A’,
   43-story ‘Tower B’, and 53-story ‘Tower C’), including a four-story podium connecting all
   three towers. The Environmental Impact Report (EIR) will analyze two development
   scenarios, “Option 1” and “Option 2” for the residential component of the 65-story Tower A,
   located at the corner of Georgia Street and Olympic Boulevard (directly across from L.A.
   Live).

   • **Option 1**: The Project would include up to 1,367 residential units and up to 40,000
     square feet of commercial space (restaurant, retail, and other commercial uses).

     • Tower A would include up to 488 residential units and up to 19,952 square
       feet of commercial uses.

   • **Option 2**: The Project would include up to 1,000 hotel rooms and 879 residential
     units, and up to 40,000 square feet of commercial space (restaurant, retail, and
     other commercial uses).

     • Tower A would include up to 1,000 hotel rooms and up to 19,952 square feet
       of commercial uses.

Development of Towers B and C would be the same under both Option 1 and Option 2:

• Tower B would include up to 363 residential units and up to 11,769 square feet of
  commercial uses.
Tower C would include up to 516 residential units and up to 8,279 square feet of commercial uses.

See Table 2 below for Summary of Proposed Uses and Figure 3 for the Project’s Conceptual Site Plan and Figures 4 and 5 for the Project’s elevations. Commercial uses would include restaurant and bar uses, which would serve alcohol for on-site consumption; the retail establishments may serve alcohol for off-site consumption. The residential units consist of a range of one-bedroom, two-bedroom, and three-bedroom units, including larger penthouse units on the upper floors.

Table 2
Summary of Proposed Uses

<table>
<thead>
<tr>
<th>Tower A</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Option 1 - Tower A</strong></td>
</tr>
<tr>
<td>Residential Units</td>
</tr>
<tr>
<td>Residential Area</td>
</tr>
<tr>
<td><strong>Option 2 – Tower A</strong></td>
</tr>
<tr>
<td>Hotel Rooms</td>
</tr>
<tr>
<td>Hotel/Residential Area*</td>
</tr>
<tr>
<td><strong>Option 1 and Option 2</strong></td>
</tr>
<tr>
<td>Residential Area</td>
</tr>
<tr>
<td>Commercial Area</td>
</tr>
<tr>
<td>Total Floor Area</td>
</tr>
<tr>
<td>Height/Floors</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tower B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Units</td>
</tr>
<tr>
<td>Residential Area</td>
</tr>
<tr>
<td>Commercial Area</td>
</tr>
<tr>
<td>Total Floor Area</td>
</tr>
<tr>
<td>Height/Floors</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tower C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Units</td>
</tr>
<tr>
<td>Residential Area</td>
</tr>
<tr>
<td>Commercial Area</td>
</tr>
<tr>
<td>Total Floor Area</td>
</tr>
<tr>
<td>Height/Floors</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PROJECT TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Option 1</strong></td>
</tr>
<tr>
<td>Residential Units</td>
</tr>
<tr>
<td>Residential Area</td>
</tr>
<tr>
<td>Commercial Area</td>
</tr>
<tr>
<td>Total Floor Area</td>
</tr>
<tr>
<td>Proposed Floor Area Ratio (FAR)</td>
</tr>
<tr>
<td><strong>Option 2</strong></td>
</tr>
<tr>
<td>Hotel Rooms</td>
</tr>
<tr>
<td>Residential Units</td>
</tr>
<tr>
<td>Hotel/Residential Area</td>
</tr>
<tr>
<td>Commercial Area</td>
</tr>
<tr>
<td>---------------------</td>
</tr>
<tr>
<td>Total Floor Area</td>
</tr>
<tr>
<td>Proposed FAR</td>
</tr>
</tbody>
</table>

$sf = \text{square feet}$  

Note: Hotel uses are counted as residential area in this table.  
Note: The commercial space may be re-allocated between the three towers.  
However, the Project would include a maximum of 40,000 square feet of commercial space across all three towers.  
Source: Skidmore, Owings & Merrill, LLP, December 2016.

The ground floor of the Project would include neighborhood-serving commercial uses fronting Olympic Boulevard and Georgia Street. Residential lobbies are arranged to accommodate access from both Georgia Street and internalized vehicular drop-offs. The lobbies may be integrated with commercial uses to promote an active streetscape.

2. Building Design

The Project places emphasis on common open space with the intention of fostering a pedestrian atmosphere and a link to LA Live and the Convention Center. At the street level, a broad strip of gardens and dining terraces along Georgia Street culminate in a plaza at Olympic Boulevard. This plaza is designed to align with the street wall of the Cinema fronting Georgia Street on the opposite side of Olympic Boulevard.

The towers are placed to maximize the distance between each other, in order to maintain access to views and light. All three towers have an elevation facing Olympic Boulevard. The tower masses step to becoming incrementally more slender with increased height. The towers’ setbacks provide several distinct masses and create terraces and gardens supported by amenities. Bands of horizontal fenestration, which are made of vision glass and alternate with fritted glass projections, provide solar shading and higher insulation values while serving as balustrades and wind screens at terrace and balcony levels. The undersides of each terrace are treated in a distinctive manner.

3. Open Space and Recreational Amenities

The minimum required and the proposed amount of open space for the Project’s residential uses are presented in Table 3. Option 1 would require more open space than Option 2. The EIR will therefore analyze the maximum amount of open space required, which is for Option 1. The Project (Option 1) is required to provide 162,800 square feet of open space, and as shown in Table 5, the Project would provide approximately 163,015 square feet of open space and recreational amenities. Amenities for the residential community and potential hotel uses (Option 2) include lobbies, fitness centers, pools, recreational space, and landscaped open space. Amenities associated with the residential...
use may be shared with all Project residents. The Project would include gardens and landscaped terraces at the street level, along the podium, and within the residential tower structures. At the podium level and at discrete steps within the body of each tower, terraces and gardens would provide shared amenity spaces for residents and guests. The facades are articulated as a series of individual, discretely stacked living terraces with landscaped areas placed on different levels throughout each building.

| Table 3  
| Open Space |
|----------------------------------|----------------|----------------|
| **Open Space Required**          | **Use**       | **Amount**    | **Total**    |
| **Tower A**                      | Residential < 3 Habitable Rooms | 242 units | 24,200 sf |
|                                  | Residential = 3 Habitable Rooms | 198 units | 24,750 sf |
|                                  | Residential > 3 Habitable Rooms | 48 units | 8,400 sf   |
|                                  | **Total Tower A**                | 57,350 sf |
| **Tower B**                      | Residential < 3 Habitable Rooms | 145 units | 14,500 sf |
|                                  | Residential = 3 Habitable Rooms | 182 units | 22,750 sf |
|                                  | Residential > 3 Habitable Rooms | 36 units | 6,300 sf   |
|                                  | **Total Tower B**                | 43,550 sf |
| **Tower C**                      | Residential < 3 Habitable Rooms | 206 units | 20,600 sf |
|                                  | Residential = 3 Habitable Rooms | 259 units | 32,375 sf |
|                                  | Residential > 3 Habitable Rooms | 51 units | 8,925 sf   |
|                                  | **Total Tower C**                | 61,900 sf |
| **PROJECT TOTAL**                | Residential < 3 Habitable Rooms | 593 units | 59,300 sf |
|                                  | Residential = 3 Habitable Rooms | 639 units | 79,875 sf |
|                                  | Residential > 3 Habitable Rooms | 135 units | 23,625 sf |
|                                  | **Project Total**                | 162,800 sf |
| **Open Space Provided**          | **Use** | **Total** |
| **Tower A**                      | Ground Level | 10,064 sf |

1 Option 2 would require less open space, as the hotel uses are not subject to open space requirements. However, the EIR will analyze the maximum amount of open space required, which is for Option 1.
<table>
<thead>
<tr>
<th>Area</th>
<th>Square Feet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Podium Roof Level (Common Open</td>
<td>22,394 sf</td>
</tr>
<tr>
<td>Space)</td>
<td></td>
</tr>
<tr>
<td>Podium Roof Level (Recreation</td>
<td>6,271 sf</td>
</tr>
<tr>
<td>Rooms)</td>
<td></td>
</tr>
<tr>
<td>Lower Amenity Level (Common Open</td>
<td>3,200 sf</td>
</tr>
<tr>
<td>Space)</td>
<td></td>
</tr>
<tr>
<td>Lower Amenity Level (Recreation</td>
<td>6,000 sf</td>
</tr>
<tr>
<td>Rooms)</td>
<td></td>
</tr>
<tr>
<td>Upper Amenity Level (Common Open</td>
<td>3,200 sf</td>
</tr>
<tr>
<td>Space)</td>
<td></td>
</tr>
<tr>
<td>Upper Amenity Level (Recreation</td>
<td>4,328 sf</td>
</tr>
<tr>
<td>Rooms)</td>
<td></td>
</tr>
<tr>
<td>Podium Level</td>
<td>4,455 sf</td>
</tr>
<tr>
<td>Private Open Space</td>
<td>8,052 sf</td>
</tr>
<tr>
<td><strong>Tower A Open Space Provided</strong></td>
<td>67,963 sf</td>
</tr>
<tr>
<td><strong>Tower B Open Space Provided</strong></td>
<td>58,902 sf</td>
</tr>
<tr>
<td><strong>Tower C Open Space Provided</strong></td>
<td>36,150 sf</td>
</tr>
<tr>
<td><strong>PROJECT TOTAL</strong></td>
<td></td>
</tr>
<tr>
<td>Ground Level</td>
<td>16,543 sf</td>
</tr>
<tr>
<td>Podium Levels</td>
<td>4,455 sf</td>
</tr>
<tr>
<td>Podium Roof Level</td>
<td>67,741 sf</td>
</tr>
<tr>
<td>Amenity Levels</td>
<td>35,685 sf</td>
</tr>
<tr>
<td>Private Open Space</td>
<td>22,539 sf</td>
</tr>
<tr>
<td>Podium Roof</td>
<td>16,053 sf</td>
</tr>
<tr>
<td><strong>Project Open Space Provided</strong></td>
<td>163,015 sf</td>
</tr>
<tr>
<td><em>(approximate)</em></td>
<td></td>
</tr>
</tbody>
</table>

*sf = square feet*

*Source: Skidmore, Owings & Merrill, LLP, December 2016.*

*Note: This is the amount of open space that would be required and provided under Option 1. Option 2 would,*
require and provide less open space based on the inclusion of up to 1,000 hotel rooms in place of Tower A’s 488 residential units. However, the EIR will analyze the maximum amount of open space required, which is as provided in this table for Option 1.

4. Signage and Lighting

The Project includes a Sign District (“SN”), which would include three off-site signs, with a combined sign face area of 3,600 square feet (sf) (see Figures 6-8). This includes three digital display sign faces that are architecturally integrated into the podium façades in a manner that complements the existing unique signage in the Los Angeles Sports and Entertainment District Specific Plan Area. Sign A is a 20’ x 60’ = 1,200 sf off-site sign that wraps the corner and will be architecturally integrated into the podium façades that face on Georgia Street and Olympic Boulevard. Sign B is a 20’ x 60’ = 1,200 sf off-site sign that will be architecturally integrated into the podium façade, and will face on the Harbor Freeway (I-110). Sign C is a 20’ x 60’ = 1,200 sf off-site sign that will be architecturally integrated into the podium façade, and will face on the Harbor Freeway (I-110). Freeway facing digital display signage would be subject to approval by the California Department of Transportation where applicable. All plaza-facing podium parking would be either lined with residential units or screened in a manner intended to be architecturally consistent with the building façades and may occasionally be punctuated with integrated commercial video display boards, architectural lighting, and environmental graphics pursuant to the establishment of the proposed SN Sign District for the Project.

Exterior light fixtures would be architecturally integrated with the character of the structure and would be designed to prevent glare, light trespass and light pollution. Permanently installed exterior lighting would not blink, flash or be of unusually high intensity. All exterior fixtures would be selected as full cut off fixtures designed to light downward only, or would utilize optical accessories to eliminate light pollution. Exterior fixtures would be directed away from adjacent properties and public rights-of-way.

Tower facade lighting would uplight the exterior terraces on various levels of the ceilings. Light fixtures would be located and shielded as necessary to minimize light pollution in the sky. Facade lighting for the towers would be limited to the uplight at the exterior terraces. Vertical surfaces of the tower would not be illuminated.

Podium facade lighting would include uplight vertical surfaces and integrated lighting highlighting vertical features. Light fixtures would be located and shielded as necessary to minimize any light pollution in the sky. The lighting system would consist of energy efficient light fixtures and lighting sources ranging from 2700 – 3500 Kelvin color temperature with minimum 90+ CRI (color rating index.) Lighting sources would be exclusively LED sources, with the possible exceptions of some individual decorative fixtures.
5. Access, Circulation, and Public Transportation

Access would be the same under Option 1 and Option 2. Vehicular access to the Project Site would be provided from separate entrances on Georgia Street, Bixel Street, and James M. Wood Boulevard. The design would include a ground-floor porte-cochere serving Tower A for residential (or hotel) and commercial ingress and egress on both Georgia Street and Bixel Street. Tower A’s parking is contained entirely in five (5) subterranean levels. In addition to the five (5) subterranean parking levels, Tower B and C would have three (3) levels of podium parking above the ground-floor commercial space and share a ground-floor valet and drop-off area with ingress and egress on Georgia Street and James M. Wood Boulevard. Pedestrian ingress and egress to the Project’s residential components are provided via lobby entrances, located for each tower by the valet/drop-off areas and fronting Georgia Street. The ground level frontage along Georgia Street provides open space and landscaping to encourage pedestrian access to the commercial areas of the Project. Short term bicycle parking will be located adjacent to the residential lobbies of each building. Access to these storage areas is provided through curb cuts along Georgia Street that lead to the valet/drop off roundabouts in front of each of the three residential buildings.

The Project Site is located in a Transit Priority Area (see Figure 9), which according to SB 743, is an area located within 0.5-mile of an existing or planned major transit stop, which includes the intersection of two or more bus routes having a service frequency interval of 15 minutes or less during peak commute periods. The Los Angeles County Metropolitan Transportation Authority (Metro) provides bus, transit-way, and rail service to the immediate vicinity of the Project Site. Olympic Boulevard carries Metro Rapid bus line 728 and Metro Local bus line 28 past the Project Site with a stop adjacent to the Site. East of the Project Site, Figueroa Street carries Metro Express bus lines 442 and 460 and Metro Local bus line 81 (northbound), while Metro Local bus line 81 (southbound) is located one block to the east on Flower Street. In addition, the Metro Silver Line transitway (Metro Busway Routes 910 and 950X), running from El Monte to San Pedro via downtown, runs northbound on Figueroa Street and southbound on Flower Street. The Metro Pico Station, which serves the Blue Line, is located approximately 0.2 miles (three blocks) south of the Project Site. The 7th Street/Metro Center station, which serves the Expo and Blue Lines as well as the Red and Purple Lines, is located approximately 0.4 miles (three blocks) northeast of the Project Site. The Metro Blue Line provides rail service from downtown Los Angeles to downtown Long Beach and the Metro Expo Line currently provides rail service from downtown Los Angeles to Santa Monica.
6. Parking

Table 4 presents the amount of parking required and the amount provided, in accordance with the LAMC. As stated previously, Option 1 would require more parking than Option 2. The EIR will therefore analyze the maximum amount of parking required, and thus for Option 1. Required vehicle parking for Option 1 totals 1,603 spaces for the Project. The Project (Option 1) would provide 2,131 spaces, which would be provided on five levels below grade and three above-grade podium levels. Three levels of podium parking are provided above ground level commercial space and the lobbies at Towers B and C.

<table>
<thead>
<tr>
<th>Use</th>
<th>Amount</th>
<th>Total Spaces</th>
<th>Use</th>
<th>Total Spaces</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential &lt; 3 Habitable Rooms</td>
<td>0 units</td>
<td>0</td>
<td>Accessible</td>
<td>9</td>
</tr>
<tr>
<td>Residential = 3 Habitable Rooms</td>
<td>242 units</td>
<td>242</td>
<td>Van Accessible</td>
<td>2</td>
</tr>
<tr>
<td>Residential &gt; 3 Habitable Rooms</td>
<td>246 units</td>
<td>308</td>
<td>Residential</td>
<td>500</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>19,952 sf</td>
<td>20</td>
<td>Commercial/Restaurant</td>
<td>20</td>
</tr>
<tr>
<td><strong>Total Tower A</strong></td>
<td>570 spaces</td>
<td></td>
<td><strong>Total Tower A</strong></td>
<td>531 spaces</td>
</tr>
<tr>
<td>Residential &lt; 3 Habitable Rooms</td>
<td>29 units</td>
<td>29</td>
<td>Accessible</td>
<td>21</td>
</tr>
<tr>
<td>Residential = 3 Habitable Rooms</td>
<td>116 units</td>
<td>116</td>
<td>Van Accessible</td>
<td>3</td>
</tr>
<tr>
<td>Residential &gt; 3 Habitable Rooms</td>
<td>218 units</td>
<td>273</td>
<td>Residential</td>
<td>1,162</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>11,769 sf</td>
<td>12</td>
<td>Commercial/Restaurant</td>
<td>12</td>
</tr>
<tr>
<td><strong>Total Tower B</strong></td>
<td>430 spaces</td>
<td></td>
<td><strong>Total Tower B</strong></td>
<td>1,198 spaces</td>
</tr>
<tr>
<td>Residential &lt; 3 Habitable Rooms</td>
<td>41 units</td>
<td>41</td>
<td>Accessible</td>
<td>7</td>
</tr>
<tr>
<td>Residential = 3 Habitable Rooms</td>
<td>165 units</td>
<td>165</td>
<td>Van Accessible</td>
<td>2</td>
</tr>
<tr>
<td>Residential &gt; 3 Habitable Rooms</td>
<td>310 units</td>
<td>388</td>
<td>Residential</td>
<td>384</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>8,279 sf</td>
<td>9</td>
<td>Commercial/Restaurant</td>
<td>9</td>
</tr>
<tr>
<td><strong>Total Tower C</strong></td>
<td>603 spaces</td>
<td></td>
<td><strong>Total Tower C</strong></td>
<td>402 spaces</td>
</tr>
<tr>
<td>PROJECT TOTAL</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------------------------------------------</td>
<td>------------</td>
<td>------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential &lt; 3 Habitable Rooms</td>
<td>70 units</td>
<td>70</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential = 3 Habitable Rooms</td>
<td>523 units</td>
<td>523</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential &gt; 3 Habitable Rooms</td>
<td>774 units</td>
<td>969</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>40,000 sf</td>
<td>41</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project Total</td>
<td>1,603</td>
<td>2,131</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

sf = square feet
Source: Skidmore, Owings & Merrill, LLP, December 2016.
Note: Amount of vehicle parking shown is based on residential use type parking requirements under Option 1. Option 2 (Hotel uses) requires less vehicle parking based on the inclusion of up to 1,000 hotel rooms in place of 488 residential units in Tower A. However, the EIR will analyze the maximum amount of vehicle parking required, which is as provided in this table for Option 1.

Table 5 provides the requirements for both short-term and long-term bicycle parking as well as the bicycle parking proposed for the Project. Option 1 would require more bicycle parking than Option 2. The EIR will therefore analyze the maximum amount of bicycle parking required, and thus for Option 1. Short-term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long-term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. As demonstrated below in Table 5, the Project would provide bicycle parking consistent with LAMC requirements.

<table>
<thead>
<tr>
<th>Table 5</th>
<th>Bicycle Parking</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Bicycle Parking Required</td>
</tr>
<tr>
<td></td>
<td>Use</td>
</tr>
<tr>
<td>Tower A</td>
<td>Short Term</td>
</tr>
<tr>
<td>Residential</td>
<td>49</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>10</td>
</tr>
<tr>
<td>Tower A Short Term Spaces Required</td>
<td>59 spaces</td>
</tr>
<tr>
<td>Tower A Short Term Spaces Provided</td>
<td>59 spaces</td>
</tr>
<tr>
<td>Long Term</td>
<td></td>
</tr>
<tr>
<td>Residential</td>
<td>488</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>10</td>
</tr>
<tr>
<td>Tower A Long Term Spaces Required</td>
<td>498 spaces</td>
</tr>
<tr>
<td>Tower A Long Term Spaces Provided</td>
<td>498 spaces</td>
</tr>
<tr>
<td>Total Tower A</td>
<td>557 spaces</td>
</tr>
<tr>
<td>Tower B</td>
<td>Short Term</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Short Term</td>
</tr>
<tr>
<td>----------------</td>
<td>------------</td>
</tr>
<tr>
<td>Residential</td>
<td>363</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>6</td>
</tr>
<tr>
<td><strong>Tower B</strong></td>
<td></td>
</tr>
<tr>
<td>Short Term</td>
<td></td>
</tr>
<tr>
<td>Residential</td>
<td>37</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>6</td>
</tr>
<tr>
<td><strong>Spaces Required</strong></td>
<td>43 spaces</td>
</tr>
<tr>
<td><strong>Spaces Provided</strong></td>
<td>43 spaces</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>412 spaces</td>
</tr>
<tr>
<td><strong>Tower C</strong></td>
<td></td>
</tr>
<tr>
<td>Short Term</td>
<td></td>
</tr>
<tr>
<td>Residential</td>
<td>52</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>5</td>
</tr>
<tr>
<td><strong>Spaces Required</strong></td>
<td>57 spaces</td>
</tr>
<tr>
<td><strong>Spaces Provided</strong></td>
<td>57 spaces</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>579 spaces</td>
</tr>
<tr>
<td><strong>PROJECT TOTAL</strong></td>
<td></td>
</tr>
<tr>
<td>Short Term</td>
<td></td>
</tr>
<tr>
<td>Residential</td>
<td>138</td>
</tr>
<tr>
<td>Commercial/Restaurant</td>
<td>21</td>
</tr>
<tr>
<td><strong>Spaces Required</strong></td>
<td>159 spaces</td>
</tr>
<tr>
<td><strong>Spaces Provided</strong></td>
<td>159 spaces</td>
</tr>
<tr>
<td><strong>Project Total</strong></td>
<td>1,548 spaces</td>
</tr>
</tbody>
</table>

Source: Skidmore, Owings & Merrill, LLP, December 2016.
Note: Amount of bicycle parking shown is based on residential use type bicycle parking requirements under Option 1. Option 2 (Hotel uses) requires less bicycle parking based on the inclusion of up to 1,000 hotel rooms in place of 488 residential units in Tower A. However, the EIR will analyze the maximum amount of bicycle parking required, which is as provided in this table for Option 1.

7. FAR and Setbacks

While Height District No. 4 permits a Floor Area Ratio (FAR) of 13:1, the maximum permitted area of the Project Site is restricted by the “D” limitation, which limits the FAR to 6:1 without a Transfer of Floor Area Rights (TFAR), per Ordinance 164,307. An FAR of 6:1 permits a total floor area of approximately 851,922 square feet. The Project requests...
approval of a TFAR from the Los Angeles Convention Center (Donor Site) to the Project Site (Receiver Site), which would transfer up to 993,909 square feet to the Project Site. Approval of the TFAR would result in an FAR of 13:1 and would allow for sufficient floor area to build the Project. The maximum height of the Project would be up to approximately 853 feet (Tower A). Building B would have a maximum height of 550 feet and Building C would have a maximum height of 653 feet. There is no maximum height limit within the C2 zone.

8. Sustainability Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). The buildings’ arrangement of banded vision windows, shifted balconies, and fritted balustrades allow for self-shading to reduce solar heat gain. The Project would also include a number of water conservation measures that are beyond minimum Code requirements, such as:

- High Efficiency Toilets with a flush volume of 1.1 gallons or less per flush for the residential units, hotel rooms, and the residential common areas.
- CEE Tier 2 front-load clothes washers in all residential units.
- Drought Tolerant Plants – 20% percent of total landscaping.
- Artificial Turf in select locations in residential outdoor amenity spaces, subject to LADBS approval of the required Request for Modification (RFM) to the current building code to allow the installation of select artificial turf in outdoor amenity areas.
- Drip/Subsurface Irrigation in select locations (Micro-Irrigation).
- Proper Hydro-zoning/Zoned Irrigation-(groups plants with similar water requirements together).
- Pool/Spa recirculating filtration equipment.
- Pool splash troughs around the perimeter that drain back into the pools.
- Leak Detection System for swimming pools and Jacuzzi.
- Installation of water meter on the pool make-up lines to monitor water use and identify leakage.
- Water-Saving Pool Filter.

i. CEQA Guidelines Appendix F

In accordance with CEQA Guidelines Appendix F: Energy Conservation, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. Analysis of the Project’s consistency with Appendix F will also be provided in the EIR.
C. Project Construction and Scheduling

The anticipated construction schedule is approximately 48 months, with the Project becoming operational at the end of 2023. It is estimated that approximately 284,843 cubic yards of dirt would be exported from the Project Site.

While the Applicant intends to complete construction of the Project by 2023, it is at least possible that the Project might not be completed until as late as 2033. As noted below, under “Requested Discretionary Actions,” a Development Agreement (DA) may be included as part of the Project approvals, which would confer on the Applicant a vested right to develop the Project throughout the term of the agreement. It is assumed for analysis purposes that the DA would be approved in 2018, and the term of the agreement would be for a period of up to 15 years, thereby expiring in 2033.

Therefore, in addition to the 2023 buildout year analysis, the Draft EIR also includes an analysis for extended future year (2033) conditions.

Haul Route

Trucks exiting the Project Site would travel to the I-110 (Harbor) Freeway. For trucks traveling north, they would exit the Project Site and travel north on Georgia Street to the I-110 Freeway northbound on-ramp. For trucks traveling south, they would exit the Project Site and travel south on Georgia Street and west on Olympic Boulevard, to the I-110 Freeway southbound on-ramp.

D Necessary Approvals

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

1. Pursuant to Los Angeles Municipal Code (“LAMC”) Sections 14.5.6 and 14.5.8 through 14.5.12, a Transfer of Floor Area Rights (TFAR) Application for the transfer of greater than 50,000 square feet of floor area from the City of Los Angeles-owned Los Angeles Convention Center to the Project Site. Approval of the TFAR would result in a FAR of 13:1 in lieu of 6:1 FAR and 1,845,831 square feet of total floor area;
2. Pursuant to LAMC Section 12.24-W.1, a Master Conditional Use Permit for on-site and off-site sale and service of alcohol and live entertainment at multiple locations;
3. Pursuant to LAMC Section 12.24-U.14, a Conditional Use Permit for a Major Development Project;
4. Pursuant to LAMC Section 16.05, approval of Site Plan Review;

5. Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site to create five (5) ground lots and 48 airspace lots, together with approval of a haul route;

6. Pursuant to LAMC Sections 13.11 and 12.32-S, the creation of an "SN" Sign District;

7. Pursuant to LAMC Section 12.36, concurrent consideration under the Multiple Approvals Ordinance of all entitlement requests;

8. Development Agreement for a term of up to 15 years;

9. Findings of consistency with the City Center Redevelopment Plan;

10. Construction permits, including building, grading, excavation, foundation, temporary street closures, and associated permits; and

11. Other discretionary and ministerial permits and approvals that may be deemed necessary.
Figure A-5
Project Elevations – West, Option 2

Figure A-6
Proposed Signage 1


Figure A-8
Proposed Signage 3
Page A-26

Figure A-9
Transit Priority Area

Legend

- One-half Mile Radius from the 7th Street/Metro Center Station
- One-half Mile Radius from the Pico Metro Station

Source: Google Earth and CAJA Environmental Services, LLC., 2017.
The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in an Environmental Impact Report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and, thus, do not need to be addressed further in an EIR. The questions with responses that indicate a “Potentially Significant Impact” do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR with conclusions of impact reached as part of the analysis within that future document.

I. Aesthetics

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 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.” PRC 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.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC 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 thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information File No. 2452 (ZI 2452) provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any
other aesthetic impact as defined in the City’s L.A. CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

Would the project:

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

No Impact: A significant impact would occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Project Site is located in an urbanized portion of Los Angeles, and is topographically relatively flat. The Project would construct three towers which would be 853 feet, eight inches tall (Building A), 550 feet, eight inches tall (Building B), and 653 feet tall (Building C). The Project is located in a highly urbanized area, situated among a variety of towers in the immediate vicinity of the Project Site, and as such, the Project would contribute to downtown skyline views visible from public rights-of-way within the City and beyond its boundaries. Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic vistas. No further analysis is required.

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

No Impact: A significant impact would occur only where scenic resources would be damaged or removed by a project. The Project Site does not contain trees with scenic significance, rock outcroppings, or historic buildings and is not near or adjacent to a highway designated by the State as a Historic Parkway or by the Federal Highway Administration as a National Scenic Highway. In addition, the existing surrounding commercial, retail, and residential uses are not considered scenic resources. No impacts associated with scenic resources within a state scenic highway or other scenic resources would occur. Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic resources. No further analysis is required.
c. Substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact: The Project Site is currently developed with a two-story, 43,892 square-foot medical office use and urgent care facility, and surrounding surface parking lots. A significant impact may occur if a project introduces incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the surrounding area. The Project is located in a highly urbanized area on a fully developed site, situated among a variety of existing and proposed towers in the immediate vicinity of the Project Site. It will thus not introduce visual elements incompatible with the character of the surrounding area or that will otherwise substantially degrade the existing visual character or quality of the Project Site or surrounding area, which in conjunction with the area’s relatively flat topography, would not result in a significant impact. Pursuant to SB 743 and ZI 2452, Project operation would result in no impact to the visual character or quality of the site or its surroundings.

Shade/Shadow

The analysis of the Project’s potential shade/shadow impacts focuses on changes in shading conditions for those sensitive uses, such as off-site uses and activities that are dependent on access to natural light and would be impacted by shading. Off-site uses and activities that meet this criteria include routinely used outdoor spaces associated with residential, recreational, or institutional uses (pre-schools, schools, nursing homes); or commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; and existing solar collectors. To the east of the Project Site is an existing three-story residential apartment building, which is considered a light sensitive use. The Project would construct three new high-rise towers on the Site. A project would normally be considered to have an impact if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October). Therefore, for informational purposes only, a shade/shadow analysis in the EIR will disclose the Project’s potential aesthetic impacts to the nearby properties as a result of shadows cast by the Project buildings. Pursuant to SB 743 and ZI 2452, Project operation would result in no impact with respect to shading.

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

No Impact: A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible with the areas surrounding the Site or which pose a safety hazard, such as to motorists utilizing adjacent streets.
Artificial Light

An adverse impact would occur if the project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project Site is located in a well-lit urban portion of Los Angeles where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, exterior signage, and indoor building illumination (light emanating from the interior of structures which passes through windows), all of which are common to densely populated areas. The Project would introduce new light sources that are typical of mixed use residential and commercial buildings in the Downtown area, including architectural lighting, signage lighting as proposed in the creation of a Sign District pursuant to LAMC Sections 13.11 and 12.32 S, interior lighting, wayfaring, and security lighting. Lighting from the Project would thus be consistent with surrounding urban lighting conditions. The Project includes a Sign District (“SN”), which would include three off-site signs, with a combined sign face area of 3,600 square feet. This includes three sign faces that are architecturally integrated into the podium façades. Pursuant to SB 743 and ZI 2452, the Project would result in no impact to artificial light. Nevertheless, for informational purposes only, further analysis in the EIR will disclose the Project’s potential aesthetic impacts to the nearby properties due to illumination at the Project Site.

Glare

An adverse impact would occur if a project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. In constructing new towers, the Project would introduce new sources of glare. These sources of glare are those typically associated with mixed use residential and commercial buildings in the Downtown area, including a large number of high rises with glass facades, and are thus anticipated to be consistent with surrounding urban buildings. Potential reflective surfaces in the Project vicinity that could be impacted include automobiles traveling and parked on streets in the vicinity of the Project, exterior building windows, and surfaces of buildings in the Project vicinity. Excessive glare can not only restrict visibility but can also increase the ambient heat reflectivity in a given area. The potential exists for glass or other shiny building materials to cause glare impacts onto nearby uses. Therefore, for informational purposes only, this issue will be analyzed further in the EIR. Pursuant to SB 743 and ZI 2452, Project operation would result in no impact with respect to light and glare.
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 methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

b. Conflict with 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?

No Impact (a-e): A significant impact may occur if a project were to result in the conversion of state-designated prime, unique, or important agricultural land from an agricultural use to a non-agricultural use; result in the conversion of land zoned for agricultural use or land under a Williamson Act contract from agricultural use to a non-agricultural use; result in the rezoning of forest land or timberland as defined by state law; result in the loss of forest land or conversion of forest land to non-forest use; or involve other changes in the existing environment that could result in the conversion of Farmland as defined by state law to a non-agricultural use. The Project Site is currently fully developed with a medical building and surrounding surface parking lot area. The Project location is
Furthermore within a highly urbanized area in Downtown Los Angeles. The Site does not contain any agricultural uses, and is not delineated as agricultural land of any type on any maps prepared pursuant to the California Resource Agency’s Farmland Mapping and Monitoring Program. The Site is zoned for commercial uses and not agricultural or timber uses. No Williamson Act Contract applies to the Site. Additionally, the Site is not defined as timberland or forest land under the Public Resources Code. Therefore, no impacts related to agricultural or forest resources would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact: A significant impact may occur if a project is not consistent with the applicable 2016 Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The Project Site is located within the 6,600 square mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [1-hour and 8-hour standards], PM$_{10}$, and PM$_{2.5}$). As such, the Project would be subject to the SCAQMD’s AQMP. The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

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

---

2 SCAG is the federally designated metropolitan planning organization (MPO) for the southern California region.
jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area.

A significant impact may occur if the Project is inconsistent with the growth assumptions upon which the 2016 AQMP was based. As a result, Project development could have an adverse effect on the SCAQMD’s implementation of the AQMP. Therefore, this issue will be analyzed further in the EIR to determine the Project’s consistency with the SCAQMD’s AQMP.

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

**Potentially Significant Impact:** A project would result in a significant air quality impact if project-related emissions exceed federal, state or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. Construction (short-term) and operation (long-term) of the Project is anticipated to result in an increase in mobile source and energy uses which have the potential to generate emissions which could exceed federal, state, or regional standards or thresholds or contribute to an existing or projected air quality violation. Therefore, this issue will be analyzed further in the EIR to determine the Project’s impacts related to construction and operational air pollutant emissions.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

**Potentially Significant Impact:** A significant impact would occur if a project would result in a cumulatively considerable net increase in a federal or state non-attainment pollutant. The Basin is in non-attainment of state air quality standards for ozone, PM$_{2.5}$, and particulate matter less than 10 microns in size (PM$_{10}$). With regard to determining the significance of the Project’s contribution to regional emissions, the SCAQMD recommends that a project’s potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Therefore, according to the SCAQMD, an individual project that generates construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Based on the aforementioned criteria, further analysis of this topic in the EIR is required to determine the Project’s potential to result in cumulatively considerable impacts from criteria pollutants.

d. Expose sensitive receptors to substantial pollutant concentrations?

**Potentially Significant Impact:** A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences,
playgrounds, childcare centers, athletic facilities, and retirement homes. Sensitive receptors currently known in the Project vicinity include the three-story residential apartment building directly to the east of the Project Site, the Residence Inn located further east of the Project Site on Olympic Boulevard, and the Ritz Carlton Residences/JW Marriott located to the southeast of the Project Site. The Project could expose these sensitive receptors to pollutant concentrations during construction and operation. Therefore, this issue will be analyzed further in the EIR to determine the Project's potential to result in exposure of sensitive receptors to substantial pollutant concentrations.

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

Less Than Significant Impact: A significant impact would only occur if a project would generate substantial odors. The SCAQMD’s CEQA Air Quality Handbook identifies those land uses that are associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any of the uses identified by the SCAQMD as being associated with substantial odors. The Project involves the construction and operation of a mixed-use development (residential units, retail, and restaurants) and would not introduce any major odor producing uses that would have the potential to affect a substantial number of people. Odors associated with Project operation would be limited to those associated with on-site waste generation and disposal (e.g., trash cans, dumpsters). On-site trash receptacles would be covered and properly maintained in a manner that promotes odor control. Restaurant uses and other Project uses will comply with industry standard odor control practices and are not expected to create objectionable odors. Activities and materials associated with construction would be typical of construction projects of similar type and size, and Project contractors will comply with SCAQMD Rules 1108 and 1113 related to the use of construction materials that do not cause substantial impacts related to odor. Any odors that may be generated during construction of the Project would be localized and would not have the potential to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Accordingly, impacts with regard to odors would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

3 South Coast Air Quality Management District, CEQA Air Quality Handbook, Figure 5-1, April 1993.
IV. Biological Resources

Would the project:

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

Less Than Significant Impact: A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited above. The Project Site is located in an urbanized area of Los Angeles and is currently developed with a medical building, surface parking, and minimal ornamental landscaping. The Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value. No hydrological features are present on the Site and there are no sensitive habitats present. Due to the urbanized nature of the Site and surrounding area, the Site does not support habitat for candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Game (CDFG), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, a less than significant impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact: A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the state and federal regulatory agencies cited would be adversely modified by a project. As discussed above, the Project Site and surrounding area are located in a highly urbanized setting. There are no riparian areas, sensitive natural communities, or Significant Ecological Areas as defined by the City of Los Angeles located on or adjacent to the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**No Impact:** A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. Review of the National Wetlands Inventory identified no wetlands or water features on or in the immediate vicinity of the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact:** A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is developed with an existing building and other hard surfaces and currently does not interfere substantially with the movement of any native resident or migratory birds. The Project Site is located within an urban area that is highly disturbed, contains numerous high-rise buildings, and does not contain any major water bodies that would contain or support habitat for native resident or migratory bird species. The nearest location that contains vegetation with the potential for supporting migratory bird and/or wildlife use is MacArthur Park, located approximately one mile to the northwest. The Project would develop three high-rise towers on the Project Site (approximately 853 feet, 550 feet, and 653 feet tall). Although buildings of these heights could potentially interfere with bird movement, the presence of several buildings of a similar height in the immediate vicinity would generally act as a discouragement to major bird migration. Additionally, downtown Los Angeles is not known as being located within a significant bird migration route. No bodies of water exist on the Project Site to provide habitat for fish. According to the tree report prepared for the Project Site, the Project Site contains 69 trees, which may potentially provide nesting sites for migratory birds. During construction the removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area

---

5 U.S. Fish & Wildlife Service, National Wetlands Inventory: http://www.fws.gov/wetlands/data/mapper.HTML
would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with this existing regulatory requirement, impacts to nesting and migratory birds would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

Potentially Significant Impact: A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. The Project would be confined to a previously developed site and would not involve substantial changes in the existing environment. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica var. californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*). According to the tree report prepared for the Project Site (included as Appendix A to this Initial Study), there are 69 trees currently on the Project Site, including four western sycamore trees (which meet the City’s minimum size threshold for regulation as protected trees), 41 non-protected trees, 18 palms that may be considered as non-protected trees, though palms are not often considered to be true trees, and six street trees that are greater than eight inches diameter at breast height (dbh). The Project would remove all existing trees, and, if required under the City's Street Tree Ordinance, would provide replacement per the applicable City requirements. All other landscaping components of the Project will comply with all applicable LAMC requirements. Nevertheless, this issue will be analyzed further in the EIR.

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

No Impact: A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of Los Angeles and is currently developed with a medical building, paved parking, and minimal ornamental landscaping. The Project Site is not located in or adjacent to an existing or proposed Significant Ecological Area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community

---

6 City of Los Angeles, Ordinance 177404, approved March 13, 2006 and effective April 23, 2006.
Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project would not conflict with any habitat conservation plans. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

V. Cultural Resources

Would the project:

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

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

The Project Site does not contain any structures identified as historic resources under federal, state or local registers. However, the State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The oldest part of the existing medical building was built in approximately 1952, making it roughly 65 years old. No other structure or surface improvement on the Project Site meets these criteria. Therefore, whether the oldest part of the existing medical building can be considered a historical resource under CEQA and, if so, whether the Project will have a significant impact on the resource, will be analyzed further in the EIR.
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?

**Less Than Significant With Mitigation Incorporated:** Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the Project was to affect archaeological resources that fall under either of these categories. The Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas. The Project Site is located in a highly urbanized area of the Central City Community Plan Area of the City of Los Angeles, and has been disturbed by past development activities. Given that the Project would require grading and excavation to a depth of approximately 85 feet below grade, the possibility exists that previously unknown archaeological artifacts may be encountered, which is a potential significant impact.

The following Mitigation Measure shall be enforced during the construction phase of the Project. The Construction Monitor shall be responsible for implementing the Mitigation Measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that construction monitoring and coordination with a certified archaeologist has been implemented. The Construction Monitor shall maintain records demonstrating compliance with the mitigation measure and submit compliance reports as described below:

**Mitigation Measure CUL-MM-1:** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor, who shall be responsible for coordinating with a certified archaeologist to implement and enforce the following:

a. The services of an archaeologist, qualified for historic resource evaluation, as defined in CEQA and Office of Historic Preservation (OHP) Guidelines, shall be secured to implement the archaeological monitoring program. The qualified archaeologist shall be listed, or be eligible for listing, in the Register of Professional Archaeologist (RPA). Recommendations may be obtained by contacting the South Central Coastal Information Center (657- 278-5395) located at California State University Fullerton.
b. In the event of a discovery, or when requested by the Project archaeologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially significant archaeological resources.

   i. It shall be the responsibility of the Project archaeologist to: determine the scope and significance of the find; determine the appropriate documentation; ensure preservation, conservation, and/or relocation of the find; and determine when grading/excavation activities may resume in the area of the find.

   ii. Determining the significance of the find shall be guided by California Public Resources Code Division 13, Chapter 1, Section 21083.2, subdivision (g) and (h). If the find is determined to be a “unique archaeological resource”, then the applicant, in conjunction with the recommendation of the Project archaeologist, shall comply with Section 21083.2, subdivisions (b) though (f).

   iii. If at any time the Project Site, or a portion of the Project Site, is determined to be a “historical resource” as defined in California Code of Regulations Chapter 3, Article 1, Section 15064.5, subdivision (a), the Project archaeologist shall prepare and issue a mitigation plan in conformance with Section 15126.4, subdivision (b).

   iv. If the Project archaeologist determines that continuation of the Project or Project-related activities will result in an adverse impact on a discovered historic resource which cannot be mitigated, all further activities resulting in the impact shall immediately cease, and the Lead Agency shall be contacted for further evaluation and direction.

   v. The applicant shall comply with the recommendations of the Project archaeologist with respect to the documentation, preservation, conservation, and/or relocation of the find.

   vi. The Construction Monitor shall also prepare and submit documentation of the Applicant’s compliance with the Mitigation Measure CUL-MM-1 during construction every 30 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant’s Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with the mitigation measure within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by
the Construction Monitor, or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

c. Monitoring activities may cease when:

i. Initial grading and all excavation activities have concluded; or

ii. By written consent of the Project archaeologist, agreeing that no further monitoring is necessary. In this case, a signed and dated copy of such agreement shall be submitted to the Dept. of City Planning for retention in the administrative record for Case No. ENV-2016-4889-EIR.

d. At the conclusion of monitoring activities, and only if archaeological materials were encountered, the Project archaeologist shall prepare and submit a report of the findings to the South Central Coastal Information Center (SCCIC), located at:

   SCCIC Department of Anthropology
   McCarthy Hall 477
   CSU Fullerton
   800 North State College Boulevard
   Fullerton, CA 92834

e. At the conclusion of monitoring activities, the Project archaeologist shall prepare a signed statement indicating the first and last dates monitoring activities took place, and submit it to the Dept. of City Planning, for retention in the administrative file for Case No. ENV-2016-4889-EIR.

In the event of the discovery of previously known archeological resources during construction, implementation of Mitigation Measure CUL-MM-1 would reduce potential impacts to a less than significant level. Accordingly, no further analysis of this topic in the EIR is required.

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

Less Than Significant With Mitigation Incorporated: A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb
paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in the Central City Community Plan Area of the City of Los Angeles, and as described above, the Project Site has been previously graded and is currently developed with a medical office building, urgent care facility, and surrounding surface parking lot area. The Project Site does not include any known paleontological or unique geologic features. In addition, no such features are anticipated to be encountered during Project construction.\(^9\) Although no paleontological or unique geological resources are known to exist on-site, there is a possibility that paleontological resources exist at sub-surface levels on the Project Site and may be uncovered during subgrade excavation, which is a potential significant impact.

The following standard City Mitigation Measure shall be enforced during the construction phase of the Project. The Construction Monitor shall be responsible for implementing the Mitigation Measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that construction monitoring and coordination with a certified archaeologist has been implemented. The Construction Monitor shall maintain records demonstrating compliance with the mitigation measure and submit compliance reports as described below:

**Mitigation Measure CUL-MM-2:** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor, who shall be responsible for coordinating with a certified paleontologist to implement and enforce the following:

a. If any paleontological materials are encountered during the course of Project development, the Construction Monitor, in accordance with CUL-MM-2, shall coordinate with the services of a paleontologist, and all further development activity shall halt and the following shall be undertaken:

   i. 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.

\(^9\) City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.
ii. In the event of a discovery, or when requested by the Project paleontologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially significant paleontologist resources. 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, including those set forth in California Public Resources Code Section 21083.2.

iii. The Construction Monitor shall also prepare and submit documentation of the Applicant’s compliance with the Mitigation Measure CUL-MM-2 during construction every 30 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant’s Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with the mitigation measure within two business days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the Construction Monitor, or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

iv. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.

v. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.

b. At the conclusion of monitoring activities, the Project paleontologist shall prepare a signed statement indicating the first and last dates monitoring activities took place, and submit it to the Dept. of City Planning, for retention in the administrative file for Case No. ENV-2016-4889-EIR. Copies of the paleontological survey, study or report shall also be submitted to the Los Angeles County Natural History Museum.

d. Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.

In the event of the discovery of previously known paleontological or unique geological resources during construction, implementation of Mitigation Measure CUL-MM-2 would reduce
potential impacts to a less than significant level. Accordingly, no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact: A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. The Project Site is located in a heavily urbanized area, and is developed with an existing medical building. No known traditional burial sites or other type of cemetery usage has been identified with the Project Site and immediate vicinity. The likelihood of encountering human remains on the Project Site is therefore minimal. However, during the construction phase and excavation of the subterranean parking levels, there is a possibility that human remains could be encountered, which is a potential significant impact. If human remains are encountered during construction demolition and/or grading activities, California 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. In the event that human remains are discovered during excavation activities, the following procedure (CEQA Guidelines, Section 15064.5) 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 as provided in Public Resources Code Section 5097.98. If the owner does not accept the descendant’s recommendations, the owner or the descendent may request mediation by the NAHC.

Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains discovered during construction grading and/or excavation activities. Therefore, the Project’s impacts on human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.
VI. Geology and Soils

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts:

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

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

   **Potentially Significant Impact:** Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. In addition, the City of Los Angeles designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential.

   There are several principal active faults in the metropolitan region. The greatest of these is the San Andreas Fault, approximately 35 miles (55 kilometers) northwest of downtown Los Angeles, on the other side of the San Gabriel Mountains. Several other important active faults lie closer to and even within the populated area of greater Los Angeles. These include the Sierra Madre fault zone, which runs through parts of Altadena and other foothills communities, the Raymond Fault in San

---

Marino, and the Hollywood and Santa Monica Faults along the southern edge of the Hollywood Hills and Santa Monica Mountains.

The Project Site is not within an Alquist-Priolo Fault Zone or a Fault Rupture Study Zone.\(^{11}\) The Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards, and with seismic safety requirements in the UBC and the LAMC. Nonetheless, because the Site is located in a seismically active region, potential impacts associated with fault rupture will be analyzed further in the EIR.

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

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

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

**Potentially Significant Impact:** Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose to medium dense sand and silty sand are factors that could contribute to the potential for

\(^{11}\) City of Los Angeles, ZIMAS Parcel Profile Reports, website: [http://zimas.lacity.org](http://zimas.lacity.org), October 28, 2016.
liquefaction. The Project Site is not identified by ZIMAS as being within a liquefaction zone.\textsuperscript{12} The City of Los Angeles Seismic Safety Element does not identify the Project Site as being within a liquefiable area, but there are some areas nearby that are susceptible to liquefaction.\textsuperscript{13} The Project would be required to comply with building regulations set forth by the State Geologist, which require site analysis prior to development. Furthermore, the Project would comply with the CGS \textit{Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California} (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards including liquefaction. Nonetheless, the EIR will analyze the potential for impacts related to seismic-related ground shaking.

\textbf{iv. Landslides, caused in whole or in part by the project’s exacerbation of existing environmental conditions?}

\textbf{Less Than Significant Impact:} A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding, caused in whole or in part by the project’s exacerbation of existing environmental conditions. Landslides can occur on slopes under normal gravitational forces and during earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is relatively flat, generally at an elevation of about 250 feet at the north side and dropping to an elevation of about 243 feet at the south side of the Project Site, and is not identified by ZIMAS as being within a landslide hazard zone.\textsuperscript{14} Therefore, potential impacts associated with landslides would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

\textbf{b. Result in substantial soil erosion or the loss of topsoil?}

\textbf{Potentially Significant Impact:} A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Construction activities such as grading and excavation could create a potential for soil erosion for a limited time period during grading and construction phases of the Project, though the Project will comply with the Los Angeles Building Code provisions related to the reduction of sedimentation and erosion effects, in addition to implementing a Storm Water Pollution Prevention Plan (SWPPP) pursuant to National Pollutant Discharge Elimination System (NPDES) permit(s). A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

\textsuperscript{12} \textit{Ibid.}
\textsuperscript{13} \textit{City of Los Angeles, Safety Element of the General Plan, Areas Susceptible to Liquefaction, Exhibit B.}
\textsuperscript{14} \textit{City of Los Angeles, ZIMAS Parcel Profile Reports, website: http://zimas.lacity.org, October 28, 2016.}
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project’s exacerbation of the existing environmental conditions?

**Potentially Significant Impact:** A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property, caused in whole or in part by the project’s exacerbation of existing environmental conditions. The degree to which geologic or soil instabilities exist at the Project Site are unknown at this time. A site-specific geotechnical evaluation will be prepared for the Project Site which will assess the potential for these soil stability hazards and include site-specific recommendations for Project design. The results of the geotechnical evaluation will be included in the EIR. Potential impacts associated with this topic will be analyzed in the EIR.

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?

**Potentially Significant Impact:** A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, posing a hazard to life and property, caused in whole or in part by the project’s exacerbation of existing environmental conditions. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink as water is drawn away. If soils below the development consist of expansive clays within a zone where the water content can fluctuate, foundation movement and/or damage can occur. The degree to which expansive soils exist at the Project Site is unknown at this time. A site-specific geotechnical evaluation will be prepared for the Project Site which will assess the potential for these soil stability hazards and include site-specific recommendations for Project design. The results of the geotechnical evaluation will be included in the EIR. Potential impacts associated with this topic will be analyzed in the EIR.

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

**No Impact:** A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.
VII. Greenhouse Gas Emissions

Would the project:

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

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

Potentially Significant Impact (a-b): Construction and operation of the Project has the potential to generate greenhouse gas emissions because it will result in new construction and uses, which have the potential to either individually or cumulatively result in a significant impact on the environment. In addition, the Project would generate vehicle trips that would contribute to the emission of GHGs. The amount of GHG emissions associated with the Project has not been estimated at this time. In addition, the Project will need to be fully evaluated for consistency with all applicable plans, policies, and regulations for the purpose of reducing the emissions of greenhouse gases, including but not limited to the City’s Green Building Code, AB 32, and SB 375. Therefore, the Project’s generation of greenhouse gas emissions and consistency with plans will be analyzed in the EIR.

VIII. Hazards and Hazardous Materials

The following analysis is based, in part, on the Environmental Site Assessment-Phase I (Phase I ESA) prepared for the Project by California Environmental Geologists & Engineers, Inc., dated February 2017. All specific information on historic and existing on-site conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix B of this Initial Study.

As discussed above, in 2015, the California Supreme Court, in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project’s residents. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would
have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts:

*Would the project:*

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

**Less Than Significant Impact:** A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The operation of residential and commercial uses associated with the Project would use minimal amounts of hazardous materials for routine cleaning and maintenance. These hazardous materials include small quantities of commercially available cleaning solutions, solvents, and pesticides. Additionally, the Project would utilize limited amounts of hydraulic fluid in the elevator equipment and limited quantities of refrigerant in the Heating, Ventilation and Air Conditioning (HVAC) system. All potentially hazardous materials would be contained, stored, and used in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations. With compliance with existing federal, state, and local regulations, the transport, use, and storage of these materials would not pose a significant hazard to the public or the environment. Therefore, the Project would result in a less than significant impact, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**Potentially Significant Impact:** A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. The Project includes the demolition and removal of an existing onsite medical building. Therefore, the potential exists for the Project to create a hazard to the public or environment involving the release of hazardous materials into the environment related to demolition and removal of deconstruction materials from the medical building and other construction activities. A prior site investigation conducted in 2015 entitled *Phase I Environmental Site Assessment Report*, attached as Appendix B to this Initial Study, indicates that past Site uses include a gasoline service station that operated for approximately 39 years at 1001 West Olympic Blvd., an automotive repair facility that operated for approximately 22 years at 1013 West Olympic Blvd., a machine shop that operated for 9 years at 971 South Georgia St., a printing shop that operated for up to 13 years at 934 South Bixel St., and a chemical and research laboratory that operated for up to 20 years at the former 1000-1016 West 9th St. Such prior investigations also indicated that the site may have previously contained a 250-gallon waste oil underground storage tank (UST) that may be associated with auto repair activities, likely located near the corner of Georgia Street and West
Olympic Blvd, and potentially several additional UST and underground hydraulic hoists in the former auto repair area. Therefore, this issue will be analyzed further in the EIR.

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

**Potentially Significant Impact:** A significant adverse effect may occur if a Project Site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Project Site is located within 0.5 mile of the following schools:  

- Los Angeles Universal Pre-School, 888 S. Figueroa Street #800, approximately 0.4 mile northeast of the Site;
- Kid City Hope Place (After School Program), 1021 S. Hope Street, approximately 0.4 mile southeast of the Site; and
- Tenth Street Elementary School, 1000 Grattan Street, approximately 0.5 mile southwest of the Site.

The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance that would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. However, since the Project may require the offsite transport of hazardous materials related to construction work associated with the current onsite medical facility and potentially impacted soil, the potential for an impact exists. Therefore, this issue will be further analyzed in the EIR.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment, caused in whole or in part by the project’s exacerbation of existing environmental conditions?

**Potentially Significant Impact:** California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for

---

15 NavigateLA, Schools Layer: http://navigatela.lacity.org/navigatela/
Environmental Protection on at least an annual basis. A significant impact may occur if a Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses, caused in whole or in part by the Project’s exacerbation of existing environmental conditions. Based on the Phase I Environmental Site Assessment Report, 1025 West Olympic Blvd. is listed in the California Facility Inventory and Active UST Facilities database, though the former UST at this site has previously been removed, and a subsurface investigation indicated no further action is required related to this UST. The current medical facility is listed on the Facility and Manifest Data (HAZNET) database for the generation of hazardous wastes in the form of other inorganic solid waste, metal sludge (alkaline solution pH greater than or equal to 12.5 with metals), and unspecified oil containing waste from 1996 to 1999 and in 2005. The former auto repair business is also listed on the HAZNET database for hazardous waste generation from 1993 to 1998, 1999, and 2008. The hazardous waste generated included aqueous solution with total organic residues less than 10 percent, unspecified solvent mixture, tank bottom waste, waste oil, mixed oil, other organic solids, and unspecified organic liquid mixture which was disposed of via a recycler, transfer station, or an unreported method. The hazardous waste generation of the tank bottom waste pertains to the former 250-gallon waste oil UST on-site. Finally, the gas station at 1001 West Olympic Blvd. is listed on the EDR Exclusive Historic Gas Stations (EDR US Hist Auto Stat) database. According to the Phase I ESA prepared for the Project Site, none of the above listings appear to indicate reports of unauthorized releases of hazardous materials. Because the Project Site is listed on multiple environmental databases, this issue will be further analyzed in the EIR.

**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 exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?**

**No Impact (e-f):** A significant impact may occur if a project is located within two miles of a public airport or within the vicinity of a private airstrip. The nearest airport is the Los Angeles International Airport (LAX) located approximately 10 miles southwest of the Project Site. The closest private airstrip is the Los Alamitos Army Airfield, which is approximately 22 miles southeast of the Project Site. The Project Site is not located in the vicinity of a public airport or private airstrip. Therefore, no impact regarding this topic would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

**f. For a project within the vicinity of a private airstrip, would the project exacerbate current environmental conditions so as to result in a safety hazard for the people residing or working in the area?**

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

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part by the project’s exacerbaion of existing environmental conditions?

No Impact: A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone. The Project Site is located in a highly urbanized area and is therefore not located within a designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element. Therefore, no impact regarding this topic would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

IX. Hydrology and Water Quality

Would the project:

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

Less Than Significant Impact: A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the City’s Low Impact Development (LID) Ordinance, Standard Urban Storm Water Mitigation Plan (SUSMP), and Storm Water Pollution Prevention Program (SWPPP) requirements to reduce potential water quality impacts. The Project involves the development of three mixed-use high-rise towers on land that is currently fully developed and completely paved. The Project would not alter the existing surface water runoff drainage pattern, would not alter rainfall absorption at the Project Site, and would not result in a net increase of rates of stormwater discharge which may exceed water quality

\[\text{(16) City of Los Angeles, ZIMAS Parcel Profile Reports, website: } \text{http://zimas.lacity.org, October 28, 2016.}\]
\[\text{(17) City of Los Angeles, Safety Element of the General Plan, Selected Wildfire Hazard Areas, Exhibit D.}\]
standards or waste discharge requirements. Therefore, this potential impact on water quality standards or waste discharge requirements would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact: A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. The Project does not propose any permanent groundwater wells or pumping activities. All water supplied to the Site would be derived from the City’s existing water supply and infrastructure. In addition, the Project would not increase the amount of impervious surface area located on the Project Site and would increase landscaping on the Project Site upon completion of project construction. However, construction of the Project would include excavation and could possibly require dewatering at the Site. The depth of the proposed excavation is approximately 85 feet below grade. Therefore, this issue will be addressed in the EIR.

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

Less Than Significant Impact: A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project. There are no natural watercourses on the Project Site. The Project Site is currently fully developed. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Site. However, compliance with the requirements of the mandated construction SWPPP under the National Pollutant Discharge Elimination System (“NPDES”) Construction General Permit (Order No. 2012-0006-DWQ), the City’s LID Ordinance, SUSMP requirements, and City grading and building permit regulations would reduce the occurrence of erosion and siltation during construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact: A significant impact may occur if a project results in increased runoff volumes during construction or if operation of the Project would result in flooding conditions
affecting the Project Site or nearby properties. The Project Site is currently fully developed. The Project would increase the amount of landscaped area on the Project Site. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Project Site and off-site flows. However, compliance with the requirements of the mandated construction SWPPP under the NPDES Construction General Permit (Order No. 2012-0006-DWQ), the City’s LID Ordinance, SUSMP requirements, and City grading and building permit regulations would reduce the occurrence of erosion and siltation during construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact:** A significant impact may occur if a project would increase the volume of stormwater runoff to a level which exceeds the capacity of the storm drain system serving the Project Site, or if the Project would introduce substantial new sources of polluted runoff. Construction of the Project could contribute to the degradation of existing surface water quality conditions primarily due to: 1) potential erosion and sedimentation during the grading phase; 2) particulate matter from dirt and dust generated on the Site; and 3) construction activities and equipment. However, as discussed in Checklist Questions IX(a) and IX(c), Hydrology and Water Quality, above, compliance with the requirements of the mandated construction and operation SWPPP, as well as with the requirements of the City’s Low Impact Development Ordinance and/or Standard Urban Stormwater Mitigation Plan (“SUSMP”), would reduce the amount of additional stormwater runoff from the Project Site and the introduction of pollutants to stormwater runoff during construction and operation to the maximum extent practicable. Development of the proposed Project would not increase overall stormwater runoff volume as the Project Site is currently almost completely covered with impervious surfaces. The Project would increase the amount of landscaped and pervious area on the Project Site compared to existing conditions, and would not increase overall volume of stormwater runoff. Therefore, this potential impact would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

f. Otherwise substantially degrade water quality?

**Less Than Significant Impact:** As previously discussed, the Project may require the offsite transport of hazardous materials related to construction work associated with the current onsite medical facility and impacted soil. The Project could involve the use of contaminants that could potentially degrade water quality if not properly handled and stored. However, compliance with the requirements of the mandated construction and operation SWPPP, as well as with the requirements of the City’s Low Impact Development Ordinance and/or SUSMP, would reduce the introduction of contaminants to stormwater runoff during Project construction and operation to the maximum extent practicable.
practicable. Therefore, this potential impact would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

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

No Impact (g-h): The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods.\textsuperscript{18} The Project Site is not located within a City-designated 100-year or 500-year flood plain.\textsuperscript{19} As the Project Site is located in an area of minimal flooding, the Project would not introduce people or structures to an area of high flood risk. Therefore, the Project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact: A significant impact may occur if a project were located in an area where flooding, including flooding associated with dam or levee failure, would expose people or structures to a significant risk of loss, injury, or death. As discussed above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin or within a dam inundation area.\textsuperscript{20} The Project Site is not located within a potential inundation area resulting from the failure of a dam or levee. As such, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

j. Inundation by seiche, tsunami, or mudflow?

No Impact: A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the Site is located adjacent to a hillside area with soil characteristics that would

\textsuperscript{18} NavigateLA, FEMA Flood Hazard layer: \url{http://navigatela.lacity.org/navigatela/}, October 28, 2016.

\textsuperscript{19} City of Los Angeles, Safety Element of the General Plan, 100-Year and 500-Year Flood Plains, Exhibit F.

\textsuperscript{20} City of Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas.
indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area, is located at least 12 miles from the Pacific Ocean and is not near any major water bodies. Therefore, there is no impact associated with seiches or tsunamis at the Project Site. In addition, the Project Site is in an urbanized portion of the City of Los Angeles, and is relatively flat, thereby limiting the potential for inundation by mudflow. No impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact: A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project would consist of three (3) high-rise towers (65-story, 43-story, and 53-story), including a five-story podium connecting all three towers. The Project Site is located in a highly urbanized and heterogeneous area of the City currently developed with a medical building. Additionally, the Project Site is entirely surrounded by existing development, roadways, and the State Route 110 (SR-110 or Harbor Freeway). Regarding to surrounding land uses, the Project would provide a mix of residential and commercial uses. As such, the Project would be an infill Project providing uses in keeping with the development of recent mixed-use projects in the surrounding area. As such, the Project would complement existing and proposed uses in the surrounding area and would not be of a density, scale, or height to constitute a physical barrier separating an established community. Thus, the Project would not physically divide an established community. Therefore, this potential impact would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact: A significant impact may occur if a project conflicts with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. The Project Site is located at the western end of the Central City Community Plan (CCCP) Area. The Project would require several discretionary actions by the City, including a Master Conditional Use Permit for on-site and off-site
sale and service of alcohol and live entertainment at multiple locations, a Conditional Use Permit for a
Major Development Project, a Transfer of Floor Area Rights (TFAR) for the transfer of greater than
50,000 square feet of floor area from the Los Angeles Convention Center (Donor Site) to the Project
Site, a Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site to create five
ground lots and 48 airspace lots, together with approval of a haul route, a site plan review,
construction permits, the creation of an "SN" Sign District, concurrent consideration under the
Multiple Approvals Ordinance of all entitlement requests, findings of consistency with the City Center
Redevelopment Plan, and other discretionary and ministerial permits and approvals that may be
deemed necessary. The EIR will provide additional analysis to assess the potential impact from the
Project’s consistency with applicable General Plan policies, zoning code restrictions, Southern
California Association of Governments (SCAG) policies, any other applicable City (such as the
Central City Community Plan) or regional plans and policies (such as the SCAQMD and Metro CMP).

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

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

XI. Mineral Resources

Would the project:

a. Result in the loss of availability of a known mineral resource that would be of
value to the region and the residents of the state?

No Impact: A significant impact may occur if a project is located in an area used or available
for extraction of a regionally-important mineral resource, and if the project converted an existing or
potential future regionally-important mineral extraction use to another use, or if the project affected
access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a City-designated oil field or oil drilling area, or a City-designated Mineral Resource Zone 2 Area (MRZ-2). The nearest oil area is the Los Angeles Downtown Oil Field located approximately 600 feet to the south of the Project Site. Therefore, the Project would have no impact with respect to loss of availability of a known regionally-important mineral resource, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**No Impact:** A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the Project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address “minerals and other natural resources.” According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. The Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, and much of the area around the Project Site has been developed with structures and is inaccessible for mining extraction. Furthermore, the Project Site is developed and located in an urbanized area. Development of the Project would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

---

22 City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.
23 Conservation Element of the City of Los Angeles General Plan, September 16, 2001, Exhibit A.
24 Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.
XII. Noise

Would the project result in:

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

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

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

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

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

Potentially Significant Impact: A significant impact may occur if the Project would introduce substantial new permanent sources of noise or would substantially add to existing sources of noise within the vicinity of the Project Site. Traffic and human activity associated with the Project, as described above, has the potential to increase permanent ambient noise levels above existing levels in a manner that exceeds applicable thresholds. Therefore, this issue will be analyzed further in the EIR.
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

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

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 a project is located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the Project. As discussed under Checklist Question VIII(e), the nearest airport is the Los Angeles International Airport (LAX) located approximately 10 miles southwest of the Project Site. The Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. The Project would therefore not expose people residing or working in the Project area to excessive noise levels from an airport use. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**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. As discussed under Checklist Question VIII(f), the closest private airstrip is the Los Alamitos Army Airfield, which is approximately 22 miles southeast of the Project Site. There are no private airstrips in the vicinity of the Site. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.
XIII. Population and Housing

Would the project:

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

**Potentially Significant Impact:** A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project (Option 1) includes the construction of a mixed-use development that would include up to 1,367 residential units and up to 40,000 square feet of commercial space. The Project would result in the generation of jobs (both for construction and operation) and would also result in an increased residential population. Therefore, this issue will be further analyzed in the EIR.

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

**No Impact:** A significant impact may occur if a project would result in displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere. Existing on-site uses include a medical office, urgent care facility, and surrounding surface parking lots. The Project would not displace any housing since there is no housing currently on the Project Site. The Project Site is currently developed with a two-story, 43,892 square-foot medical office building and urgent care facility, and surrounding surface parking lots. To accommodate the new uses, the existing medical office building, urgent care facility, and surface parking lot would be demolished. Further, the Project would develop new residential units. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**No Impact:** A significant impact may occur if a project would result in displacement of existing residents, necessitating the construction of replacement housing elsewhere. Existing on-site uses include a medical office and urgent care facility, and surrounding surface parking lots. There is no housing currently on the Project Site. The Project would not displace people necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.
XIV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:

a. Fire protection?

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

- Fire Station No. 10, located at 1335 S. Olive Street, approximately one mile driving distance from the Site.

The Proposed Project includes the construction of a mixed-use development that would include up to 1,367 residential units and up to 40,000 square feet of commercial space for Option 1, or up to 1,000 hotel rooms, 879 residential units, and up to 40,000 square feet of commercial space for Option 2. The Project would increase the intensity of development at the Project Site, and therefore, the potential impact of the Project on fire protection services will be analyzed in the EIR.

b. Police protection?

Potentially Significant Impact: A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project, necessitating a new or physically altered station in order to maintain service. The Project Site is within the LAPD’s Central Community Police Station service area, located at 251 E. 6th Street. The Proposed Project includes the construction of a mixed-use development that would include up to 1,367 residential units and up to 40,000 square feet of commercial space for Option 1, or up to 1,000 hotel rooms, 879 residential units, and up to 40,000 square feet of commercial space for Option 2. The Project would increase the intensity of development at the Project Site, and therefore, the potential impacts of the Project on police protection services will be analyzed in the EIR.

25 LAPD: http://www.lapdonline.org/central_community_police_station
c. 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 within the jurisdiction of LAUSD Local District 2 is located within 0.5 mile of the following schools:  

- Los Angeles Universal Pre-School, 888 S. Figueroa Street #800, approximately 0.4 mile northeast of the Site;
- Kid City Hope Place (After School Program), 1021 S. Hope Street, approximately 0.4 mile southeast of the Site; and
- Tenth Street Elementary School, 1000 Grattan Street, approximately 0.5 mile southwest of the Site.

The proposed Project includes the construction of a mixed-use development that would include up to 1,367 residential units (under Option 1). To the extent that the Project increases demand at LAUSD schools serving the Project Site, State law, including Government Code Section 65995.5 and 65995.6 and Education Code Section 17620, requires the payment of development fees at a specified rate for the funding of improvements and expansion to school facilities. Regulatory impact fees, such as those required under Senate Bill 50 (SB 50), imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. These fees are calculated by the City to mitigate the impact the Project will have on public services such as schools, and the payment of this fee is deemed to provide full and complete mitigation for impacts to school facilities. Therefore, impacts to schools would be reduced to a less than significant level, and no further analysis of this topic in the EIR is required.

d. Parks?

**Less Than Significant Impact:** A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities and the construction of which could cause significant environmental impacts. The proposed Project includes the construction of a mixed-use development that would include up to 1,367 residential units (for Option 1). In accordance with the requirements of the LAMC, the Project would include a number of open space

---

areas and recreational amenities, totaling 163,015 square feet. The Project would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) and comply with the requirements of LAMC Section 17.12 regarding park fees. Pursuant to Ordinance 184,505 (Parks Dedication and Fee Update ordinance), a subdivision containing more than 50 dwelling units may be required to dedicate land, make park improvements, pay a park fee or provide a combination of land dedication and park fee payment. The Los Angeles Department of Recreation and Parks (LADRP) is responsible for calculating the required park fees owed by each residential development project, including subdivision projects, pursuant to Ordinance 184,505 and issuing the fee calculation letters to Project applicants. Regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly.\(^{27}\) Park fees are calculated by LADRP, pursuant to Ordinance 184,505, and would mitigate the impact the Project will have on public services such as parks. The payment of this fee is deemed to provide full and complete mitigation for impacts to parks. Therefore, impacts to parks would be reduced to a less than significant level, and no further analysis of this topic in the EIR is required.

**e. Other public facilities?**

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

\(^{27}\) City of Los Angeles Department of Recreation and Parks – Park Fees, Attachment 1: https://www.laparks.org/sites/default/files/planning/Park%20Fees%20Rates%20and%20Fees%20effective%20July%202017.pdf
XV. Recreation

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

**Less Than Significant Impact:** Project amenities for the residential community include lobbies, fitness centers, pools, recreational space, and landscaped open space. Pursuant to Ordinance 184,505 (Parks Dedication and Fee Update ordinance), a subdivision containing more than 50 dwelling units may be required to dedicate land, make park improvements, pay a park fee or provide a combination of land dedication and park fee payment. The Los Angeles Department of Recreation and Parks (LADRP) is responsible for calculating the required park fees owed by each residential development project, including subdivision projects, and issuing the fee calculation letters to Project applicants. In addition to requirements of LAMC Section 17.12 regarding park fees, the Project would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1). Regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. Park fees are calculated by LADRP, pursuant to Ordinance 184,505, and would mitigate the impact the Project will have on public resources such as parks and recreational facilities.\(^{28}\) The payment of this fee is deemed to provide full and complete mitigation for impacts to parks and recreational facilities. In addition, the Project would provide approximately 163,015 square feet of open space (under Option 1). Therefore, impacts to parks and recreational facilities would be reduced to a less than significant level, and no further analysis of this topic in the EIR is required.

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:** The Project is required to provide 162,800 square feet of open space based on the proposed unit configuration (for Option 1). Together, the proposed design provides approximately 163,015 square feet of open space. Amenities for the residential community include lobbies, fitness centers, pools, recreational space, and landscaped open space. Amenities associated with the residential use may be shared with all Project residential occupants. As discussed above in Checklist Question XIV(d) and XV(a), regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. Pursuant to Ordinance 184,505 (Parks Dedication and Fee Update ordinance), a subdivision containing more than 50

\(^{28}\) City of Los Angeles Department of Recreation and Parks – Park Fees: https://www.laparks.org/planning/park-fees
dwelling units may be required to dedicate land, make park improvements, pay a park fee or provide a combination of land dedication and park fee payment. These fees are calculated by LADRP, pursuant to Ordinance 184,505, and would mitigate the impact the Project will have on public resources such as parks and recreational facilities. The payment of this fee is deemed to provide full and compete mitigation for impacts to recreational facilities. Therefore, impacts to recreational facilities would be reduced to a less than significant level, and no further analysis of this topic in the EIR is required.

XVI. Transportation/Traffic

Would the project:

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

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

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

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

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

**Less Than Significant Impact:** A significant impact would occur if a proposed project included an aviation-related use and would result in safety risks associated with such use. The Project does not include any aviation-related uses. Furthermore, as discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or private use airport. Safety risks associated with a change in air traffic patterns would not occur.

The Project would be required to comply with applicable Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures. Furthermore, the Project would be required to comply with the notice requirements imposed by the FAA for all new buildings taller than 200 feet and would complete Form 7460-1 (Notice of Proposed Construction or Alteration). Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

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

e. Result in inadequate emergency access?

**Potentially Significant Impact:** A significant impact may occur if a project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The increased traffic during construction and operation could obstruct emergency vehicle access to the Project Site and adjacent uses in the Project vicinity. Therefore, the EIR will provide additional analysis to assess the potential of the Project to result in impacts on emergency access.
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

**Potentially Significant Impact:** A significant impact may occur if a project would conflict with adopted policies or involve modification to existing alternative transportation facilities located on- or off-site. There are nearby bus stops on Olympic Boulevard. The Metro Pico Station, which serves the Blue Line, is located approximately 0.2 miles (three blocks) south of the Project Site. The 7th Street/Metro Center station, which serves the Expo and Blue Lines as well as the Red and Purple Lines, is located approximately 0.4 miles (three blocks) northeast of the Project Site. The Metro Blue Line provides rail service from downtown Los Angeles to downtown Long Beach and the Metro Expo Line currently provides rail service from downtown Los Angeles to Santa Monica. The potential of the Project to decrease the performance of these facilities or conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

XVII. Tribal Cultural Resources

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

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

**Potentially Significant Impact:** The Project Site does not contain any structures identified as historic resources under federal, state or local registers. However, the State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The oldest part of the existing medical building was built in approximately 1952, making it roughly 65 years old. No other structure or surface improvement on the Project Site meets these criteria. Therefore, whether the oldest part of the existing medical building can be considered a historical resource under CEQA and, if so, whether the Project will have a significant impact on the resource, will be analyzed further in the EIR.
ii. Cause a substantial adverse change in the significance of site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?

**Potentially Significant Impact:** Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

The Project will comply with all required notification and consultation under AB 52. Under 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.

The depth of the proposed excavation is approximately 85 feet below grade. If consultation is requested by any tribal group pursuant to AB 52, formal consultation will take place regarding potential tribal cultural resources. Therefore, the potential impacts of the Project on tribal cultural resources will be analyzed in the EIR.
XVIII. Utilities

Would the project:

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

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

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

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

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

Less Than Significant Impact: A significant impact may occur if the volume of stormwater runoff were to increase to a level exceeding the capacity of the storm drain system serving the Project Site, to the extent that existing facilities would need to be expanded and the construction of which would cause significant environmental effects. The Project Site is currently fully developed and covered with impervious surfaces. Development of the Project would not increase the amount of impervious surface area and would increase the amount of landscaping on the Project Site and, consequently, would not increase the volume of stormwater runoff from the Site. The Bureau of Engineering requires that adequate capacity is available in the storm drain system prior to Project Approval. The Applicant would be responsible for providing the necessary storm drain infrastructure
improvements to connect with the existing drainage system. Moreover, the Proposed Project would be required to comply with the City’s LID Ordinance (Ordinance No. 181,899), which requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities, which can be achieved through the implementation of BMPs. As such, the Proposed Project would be expected to produce similar or reduced runoff flows as compared to existing conditions. Therefore, this impact would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

**Potentially Significant Impact:** A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The Project is estimated to increase water consumption as compared to the existing uses on the Project Site. Given the Project’s size, a Water Supply Assessment by the Los Angeles Department of Water and Power (LADWP) will be conducted to evaluate the water supply’s availability to serve the Project. Any potential impacts with respect to water supply will be analyzed within the EIR.

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

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

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

**Potentially 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. The potential impacts associated with the ability of the local landfills to serve the Project will be analyzed in the EIR.

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

**Less Than Significant Impact:** Solid waste management is guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation
through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Los Angeles prepared a Solid Waste Management Policy Plan that was adopted by the City Council in 1994. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) AB 939, the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), City of Los Angeles Source Reduction and Recycling Plan (CiSRRE), Ordinance No. 171,687 and the Framework Element of the General Plan. The CiSWMPP, adopted in November 1994, is the City’s long-range policy plan that provides direction for solid waste management and serves as an umbrella document for the CiSRRE. Together, the CiSWMPP and CiSRRE specify goals, objectives, and programs for achieving AB 939. The General Plan Framework Element supports AB 939 and its goals and addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs. Finally, Ordinance No. 171,687 (the “Space Allocation Ordinance”) requires the provision of an adequate recycling area or room for collecting and loading recyclable materials for all new construction projects, multi-family residential projects of four or more units where the addition of floor area is 25 percent or more, and other development projects where the addition of floor area is 30 percent or more. The Project would provide clearly marked, durable, source sorted recycling bins throughout the Project Site to facilitate recycling in accordance with Ordinance No. 171,687. The City’s Sustainable City pLAn (2nd Annual Report for 2016-2017) calls for achieving 90 percent diversion by 2025 and 95 percent diversion by 2035. The Project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, impacts to regulations related to solid waste would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

XIX. Mandatory Findings of Significance

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

Potentially Significant Impact: Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to the issues addressed herein. Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to biological resources. Whether the Project is inconsistent with local regulations pertaining to biological resources will be analyzed in the EIR. In addition, the oldest part of the existing medical building was built in approximately 1952, making it roughly 65 years old. Whether the oldest part of the existing medical building can be considered a historical resource under
CEQA and, if so, whether the Project will have a significant impact on the resource, will be analyzed further in the EIR. Therefore, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts. All feasible mitigation measures will be identified to reduce the identified significant impacts.

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

**Potentially Significant Impact:** The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other past, current, and/or reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in an EIR. Therefore, the potential for cumulative impacts related to air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards/hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, transportation and traffic, and utilities and service systems resulting from the Project in conjunction with the applicable related projects will be analyzed and documented in the EIR. Therefore, only those aspects of the Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts.

With regards to cumulative effects with respect to aesthetics, agricultural resources, and mineral resources, the Project’s incremental contribution to potential cumulative impacts would not be cumulatively considerable. Specifically, with respect to aesthetics, pursuant to SB 743 and ZI 2452, the Project’s impacts would not be significant. With respect to agricultural resources and mineral resources, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts.

Therefore, cumulative impacts with respect to aesthetics, agricultural resources, and mineral resources would be less than significant, and no mitigation measures are required. No further analysis of these topics in the EIR is required. However, as indicated above, the EIR will address cumulative impacts associated with the remaining CEQA topic areas.
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

**Potentially Significant Impact:** As discussed above, construction and operation of the Project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in the EIR.