



City of Los Angeles

Department of City Planning • Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



INITIAL STUDY

CENTRAL CITY COMMUNITY PLAN AREA

1020 S. Figueroa Street Project

Case Number: ENV-2015-1159-EIR

Project Location: 1020 S. Figueroa Street (includes 716-730 W. Olympic Boulevard; 1016-1060 S. Figueroa Street; 607-613 W. 11th Street; and 1041-1061 S. Flower Street), Los Angeles, CA, 90015

Council District: 14

Project Description: Jia Yuan USA Co, Inc., the Applicant, proposes to develop a mixed-use residential, hotel and commercial project located at 1020 S. Figueroa Street on an approximately 2.7 acre 'L'-shaped site (Project Site) bounded by S. Figueroa Street to the west, S. Flower Street to the east, Olympic Boulevard to the north, and 11th Street to the south. The Project Site is currently developed with the nine-story Luxe City Center Hotel (Luxe Hotel) and surrounding surface parking lots, which would be removed to support the Project.

The mixed-use Project would include up to approximately 1,129,284 square feet (sf) of floor area (approximately 9.7:1 FAR) in three towers atop an eleven level podium (Podium) with eight levels above grade. The Project would include a total of up to 300 hotel rooms, 650 residential condominium units, and up to approximately 80,000 sf of retail, restaurant, and other commercial uses. The residential tower (Residential Tower 1) located at the corner of S. Flower Street and 11th Street would be 32 stories and would include up to 290 residential units. The residential tower (Residential Tower 2) at the intersection of S. Figueroa Street and Olympic Boulevard would be 38 stories and would include up to 360 residential units. Located on southwest portion of the Project Site directly across from Staples Center at the corner of Figueroa Street and 11th Street, the 34 story Hotel Tower would include up to 300 hotel rooms, along with banquet facilities, conference space and amenities. Retail, restaurant and other commercial uses would be located at ground level and within the second above grade level of the Podium. Parking would be provided within the Podium with primary access from Olympic Boulevard, S. Flower Street, and 11th Street.

APPLICANT:
Jia Yuan USA Co, Inc

PREPARED BY:
PCR Services Corporation

ON BEHALF OF:
The City of Los Angeles
Department of City Planning
Environmental Analysis Section

February 2016

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 360, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY City of Los Angeles Department of City Planning	COUNCIL DISTRICT 14	DATE 02/03/2016
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RESPONSIBLE AGENCIES

City of Los Angeles Department of City Planning

PROJECT TITLE/NO.

1020 S. Figueroa Street Project

CASE NO.

ENV-2015-1159-EIR

PREVIOUS ACTIONS CASE NO.

N/A

DOES have significant changes from previous actions.

DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

Jia Yuan USA Co, Inc., the Applicant, proposes to develop a mixed-use residential, hotel and commercial project (the Project), located at 1020 S. Figueroa Street (the Project Site), on an approximately 2.7 acre 'L'-shaped site (Project Site) bounded by S. Figueroa Street to the west, S. Flower Street to the east, Olympic Boulevard to the north, and 11th Street. The Project Site is located in the southwest portion of Downtown Los Angeles within the South Park district of the Central City Community Plan Area. The Project Site is in a highly urbanized and active area adjacent to LA LIVE, Staples Center Arena, Microsoft Theater, and in close proximity to the Los Angeles Convention Center. The Project Site is currently developed with the nine-story Luxe City Center Hotel (Luxe Hotel) and surrounding surface parking lots, which would be removed to support the Project.

The mixed-use Project would include up to approximately 1,129,284 square feet (sf) of floor area (approximately 9.7:1 FAR) in three towers atop an eleven level podium (Podium) with eight levels above grade. The Project would include a total of up to 300 hotel rooms, 650 residential condominium units, and up to approximately 80,000 sf of retail, restaurant, and other commercial uses. The residential tower (Residential Tower 1) located at the corner of S. Flower Street and 11th Street would include up to 290 residential units. The residential tower (Residential Tower 2) at the intersection of S. Figueroa Street and Olympic Boulevard would include up to 360 residential units. Located on southwest portion of the Project Site directly across from Staples Center, the Hotel Tower would include up to 300 hotel rooms, along with banquet facilities, conference space and amenities. Retail, restaurant and other commercial uses would be located at ground level and within the second above grade level of the Podium. Parking would be provided within the Podium with primary access from Olympic Boulevard, S. Flower Street, and 11th Street.

ENVIRONMENTAL SETTING:

The Project Site is currently developed with the Luxe Hotel on the northwest portion of the Project Site with the remainder of the Project Site developed with surface parking. The Luxe Hotel is a 112,748 square foot, nine story, 100 feet tall building that includes 178 guest rooms, a main lobby, meeting space area, interior restaurant, an indoor/outdoor bar and lounge area (Nixon Bar and Lounge), fitness center, and a one-level parking deck with parking below and above the deck. The Luxe Hotel is a franchise of Luxe Hotels, but had originally been constructed as the Doric Hotel in 1964. During the 1970's, the hotel became a Holiday Inn, that was later expanded in 1989 and renovated in 2002. In 2008, the hotel transitioned from a Holiday Inn to a Luxe Hotel and underwent additional renovations in 2008 through 2013. The Luxe Hotel is situated between two surface parking lots which are also on the Project Site.

PROJECT LOCATION:

The Project Site is generally referenced to be located at 1020 S. Figueroa Street (including 716-730 Olympic Boulevard, 1016-1060 S. Figueroa Street, 607-613 11th Street, and 1041-1061 S. Flower Street), within the South Park district of the Central City Community Plan Area in Downtown Los Angeles. The Project Site is served by a network of regional transportation facilities that provide access to the greater metropolitan area. Regional access to the Project Site is provided by the Pasadena/Harbor Freeway (I-110/SR 110), located approximately 0.3 miles to the west; the Santa Monica Freeway (I-10) located approximately 0.5 miles to the south; and, the Hollywood Freeway (US-101), located approximately 1.5 miles to the north. These three freeways also provide access to the Golden State/Santa Ana Freeway (I-5) to the north, and the San Bernardino Freeway (I-10) and the Pomona Freeway (SR-60) to the east and southeast, respectively.

The Project Site is located approximately 0.2 miles north of the Pico Station and approximately 0.4 miles from the 7th Street/Metro Center Station operated by the Los Angeles County Metropolitan Transportation Authority (Metro). The Project Site is also served by multiple bus and shuttle lines, including multiple Metro bus lines and the DASH Downtown Shuttle Route. The Project Site is located in a regional center which serves as a commercial center for Los Angeles and the surrounding communities, and as an entertainment center of regional importance that is a popular destination for visitors, local workers and area residents. The Project area is characterized by a mixed of entertainment, commercial, restaurant, bar, office, and residential uses. Adjacent to the Project Site and to the west across S. Figueroa Street is LA LIVE; an entertainment, hotel, and residential complex that includes the Microsoft Theater, Microsoft Square, the JW Marriott Los Angeles at LA LIVE (Marriott Hotel), the Ritz-Carlton Hotel, the Ritz-Carlton Residences, and the Marriott Courtyard and Residence Inn at Los Angeles LA LIVE. Immediately south of LA LIVE and just southwest of the Project Site, is the Staples Center Arena. Further to the southwest is the Los Angeles Convention Center, which regularly features conventions, trade shows, and exhibitions.

To the north of the Project Site across Olympic Boulevard are several high rise mixed-use residential and commercial buildings. These include the 28-story 717 Olympic project, which includes apartments over six stories of parking and ground floor commercial uses. To the immediate east of the Project Site fronting Olympic Boulevard is the 11-story Petroleum Building, a designated City Cultural-Historic Monument, which includes office above-ground level commercial uses. Also immediately east of the Project fronting on S. Flower Street, is a surface parking lot and the one-story El Cholo restaurant, with mid-and high-rise multi-family residential and mixed use buildings uses further east across S. Flower Street. To the south of the Project Site across 11th Street, is Oceanwide Plaza; a high rise mixed-use project that is currently under construction. Further south is another entitled mixed-use property pending development, known as the Circa (1200 Fig) Project, the Metro Pico Station and new and recently rehabilitated high-rise residential and mixed-use buildings.

For further discussion see Attachment A.

PLANNING DISTRICT		STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED
Central City Community Plan		
EXISTING ZONING	MAX. DENSITY ZONING	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN
C2-4D-O and [Q]R5-4D-O	FAR of 6:1 (FAR of 13:1 permitted with a Transfer of Floor Area Rights (TFAR) or Zone Change)	
PLANNED LAND USE & ZONE	MAX. DENSITY PLAN	
C2-4D-O and [Q]R5-4D-O	same	
SURROUNDING LAND USES	PROJECT DENSITY	
See above Setting Discussion. Also Attachment A, Project Description, for further discussion.	9.7:1 FAR	



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.

SIGNATURE

City Planning Associates

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects 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:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) 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.
 - c) 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:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Population/Housing | |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | | |

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)**BACKGROUND****PROPONENT NAME**

Jia Yuan USA Co, Inc

PHONE NUMBER

(213) 995-6833

PROPONENT ADDRESS

801 S. Figueroa Street, Suite 1800, Los Angeles, CA 90017

AGENCY REQUIRING CHECKLIST

City Planning Department

DATE SUBMITTED

February 03, 2016

PROPOSAL NAME (If Applicable)

1020 S. Figueroa Street Project

 **ENVIRONMENTAL IMPACTS**

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 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 Dept. 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 (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California of Fish and Game or U.S. Fish and Wildlife Service ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VI. GEOLOGY AND SOILS. Would the project:

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? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Police protection? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Parks? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Other public facilities? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Result in inadequate emergency access? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVIII. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts that 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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ATTACHMENT A: PROJECT DESCRIPTION

A. INTRODUCTION

Jia Yuan USA Co, Inc., the Applicant, proposes to develop a mixed-use residential, hotel and commercial project (the Project), located on an approximately 2.7 acre (116,660 square feet) 'L'-shaped site (Project Site) bounded by S. Figueroa Street to the west, S. Flower Street to the east, Olympic Boulevard to the north, and 11th Street to the south. The Project Site is located in the southwest portion of the Downtown community of the City of Los Angeles (City) which falls within the South Park district of the Central City Community Plan Area. The Project Site is in a highly urbanized and active area adjacent to LA LIVE, Staples Center Arena, Microsoft Theater, and in close proximity to the Los Angeles Convention Center. The Project Site is currently developed with the nine-story Luxe City Center Hotel (Luxe Hotel) and surrounding surface parking lots, which would be removed to support the Project.

The mixed-use Project would include up to approximately 1,129,284 square feet (sf) of floor area (approximately 9.7:1 FAR) in three towers atop an eleven level podium (Podium) with eight levels above grade. The Project would include a total of up to 300 hotel rooms, 650 residential condominium units, and up to approximately 80,000 sf of retail, restaurant, and other commercial uses.¹ The residential tower (Residential Tower 1) located at the corner of S. Flower Street and 11th Street would be 32 stories and would include up to 290 residential units. The residential tower (Residential Tower 2) at the intersection of S. Figueroa Street and Olympic Boulevard would be 38 stories and would include up to 360 residential units. Located on southwest portion of the Project Site directly across from Staples Center at the corner of Figueroa Street and 11th Street, the 34 story Hotel Tower would include up to 300 hotel rooms, along with banquet facilities, conference space and amenities.

Retail, restaurant and other commercial uses would be located at ground level and within the second above grade level of the Podium. Parking would be provided within the Podium with primary access from Olympic Boulevard, S. Flower Street, and 11th Street.

B. PROJECT LOCATION AND SURROUNDING USES

The Project Site is generally referenced to be located at 1020 S. Figueroa Street,² within the South Park district of the Central City Community Plan Area in Downtown Los Angeles. As shown in **Figure A-1, Regional and Site Location Map**, the Project Site is served by a network of regional transportation facilities that provide access to the greater metropolitan area. Regional access to the Project Site is provided by the Pasadena/Harbor Freeway (I-110/SR 110), located approximately 0.3 miles to the west; the Santa Monica Freeway (I-10) located approximately 0.5 miles to the south; and, the Hollywood Freeway (US-101), located approximately 1.5 miles to the north. These three freeways also provide access to the Golden State/Santa

¹ Project floor area numbers used throughout this chapter are calculated in accordance with Los Angeles Municipal Code Section 12.03.

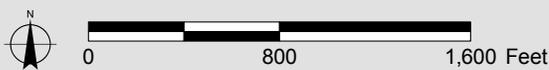
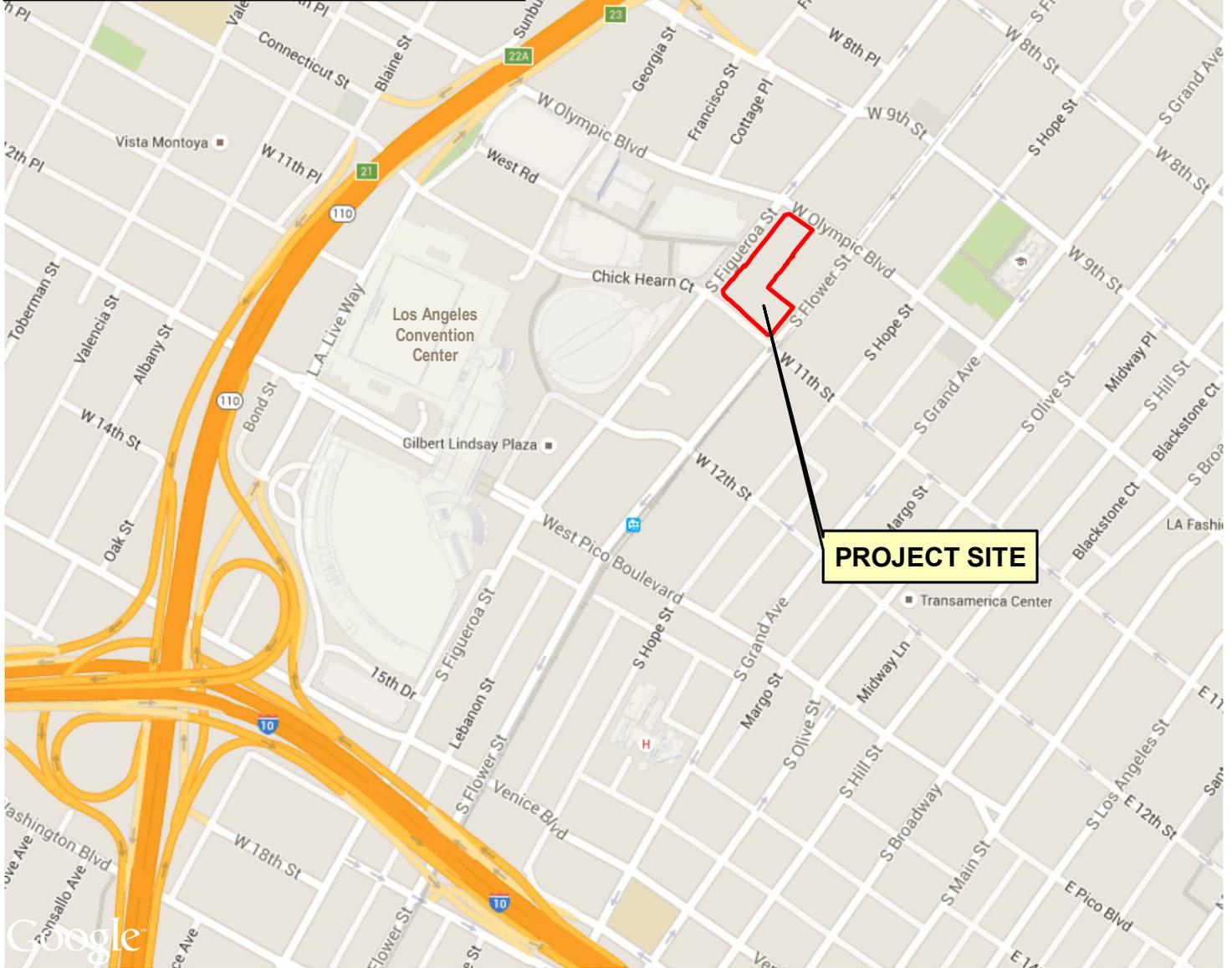
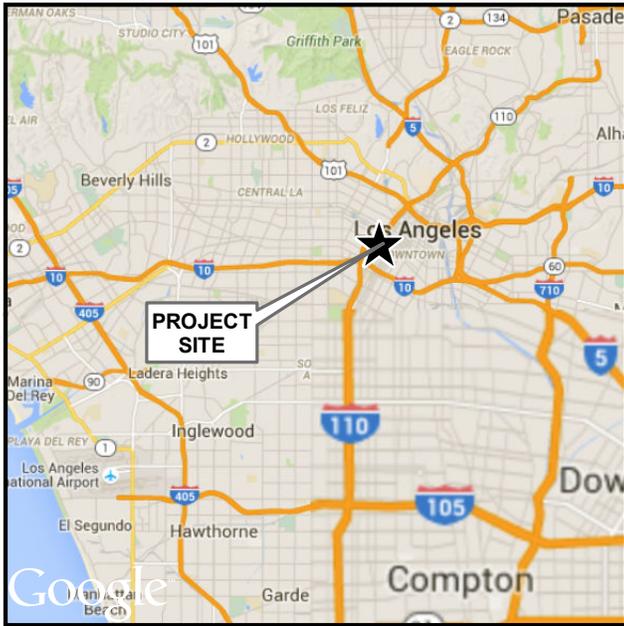
² All addresses for the Project Site are: 716-730 W. Olympic Boulevard; 1016-1060 S. Figueroa Street; 607-613 W. 11th Street; and 1041-1061 S. Flower Street

Ana Freeway (I-5) to the north, and the San Bernardino Freeway (I-10) and the Pomona Freeway (SR-60) to the east and southeast, respectively.

The Project Site is located approximately 0.2 miles north of the Pico Station operated by the Los Angeles County Metropolitan Transportation Authority (Metro). The Pico Station serves the Blue Line and the Expo Line. The Blue Line provides rail service between the City of Long Beach and Downtown Los Angeles with connecting service to the Metro Green Line (serving Norwalk, Redondo Beach, and LAX via shuttle). The Expo Line provides rail service between Downtown Los Angeles and Culver City. Phase 2 of the Expo Line will extend rail service from the current terminus in Culver City to Santa Monica, with an estimated completion date in early 2016. The Project Site is also located approximately 0.4 miles from the 7th Street/Metro Center Station which provides rail service to the Blue, Expo, Red, and Purple Lines. The Metro Red Line provides access to and from Downtown Los Angeles to Hollywood and North Hollywood, with connecting service to the Metro Orange Line (serving the west Valley and Chatsworth). The Purple Line provides a connection between Downtown Los Angeles and mid-Wilshire/Koreatown. The Project Site is also served by multiple bus and shuttle lines, including multiple Metro bus lines and the DASH Downtown Shuttle Route.

The Project Site is located in a regional center which serves as a commercial center for Los Angeles and the surrounding communities, and as an entertainment center of regional importance that is a popular destination for visitors, local workers and area residents. The Project area is characterized by a mixed of entertainment, commercial, restaurant, bar, office, and residential uses. As shown in **Figure A-2, Aerial Photograph of Project Site and Vicinity**, adjacent to the Project Site and to the west across S. Figueroa Street is LA LIVE; an entertainment, hotel, and residential complex that includes the Microsoft Theater, Microsoft Plaza, the JW Marriott Los Angeles at LA LIVE (Marriott Hotel), the Ritz-Carlton Hotel, the Ritz-Carlton Residences, and the Marriott Courtyard and Residence Inn at Los Angeles LA LIVE. Microsoft Square is an open-air plaza that hosts special events, community gatherings, cultural festivals and live performances. LA LIVE also includes more than twenty restaurants as well as other entertainment venues such as the Conga Room, Lucky Strike bowling alley, and Regal Cinemas. LA LIVE features pedestrian-oriented ground level uses, and large-scale signage, including illuminated and digital signage. Immediately south of LA LIVE and just southwest of the Project Site, is the Staples Center Arena, a multipurpose sports arena which is home to the Los Angeles Clippers, Los Angeles Kings, Los Angeles Lakers and Los Angeles Sparks. Staples Center Arena also hosts numerous concerts and special events. Further to the southwest is the Los Angeles Convention Center, which regularly features conventions, trade shows, and exhibitions.

To the north of the Project Site across Olympic Boulevard are several high rise mixed-use residential and commercial buildings. These include the 28-story 717 Olympic project, which includes apartments over six stories of parking and ground floor commercial uses. To the immediate east of the Project Site fronting Olympic Boulevard is the 11-story Petroleum Building, a designated City Cultural-Historic Monument, which includes office above ground level commercial uses. Also immediately east of the Project fronting on S. Flower Street is a surface parking lot and the one-story El Cholo restaurant, with mid-and high-rise multi-family residential and mixed use buildings uses further east across S. Flower Street. To the south of the Project Site across 11th Street, is Oceanwide Plaza; a high rise mixed-use residential, commercial, and hotel project that is currently under construction and is estimated to be completed in 2018. Further south is another entitled mixed-use property pending development, known as Circa (1200 Fig Project), the Metro Pico Station and new and recently rehabilitated high-rise residential and mixed-use buildings.

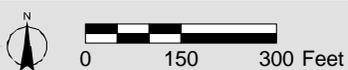
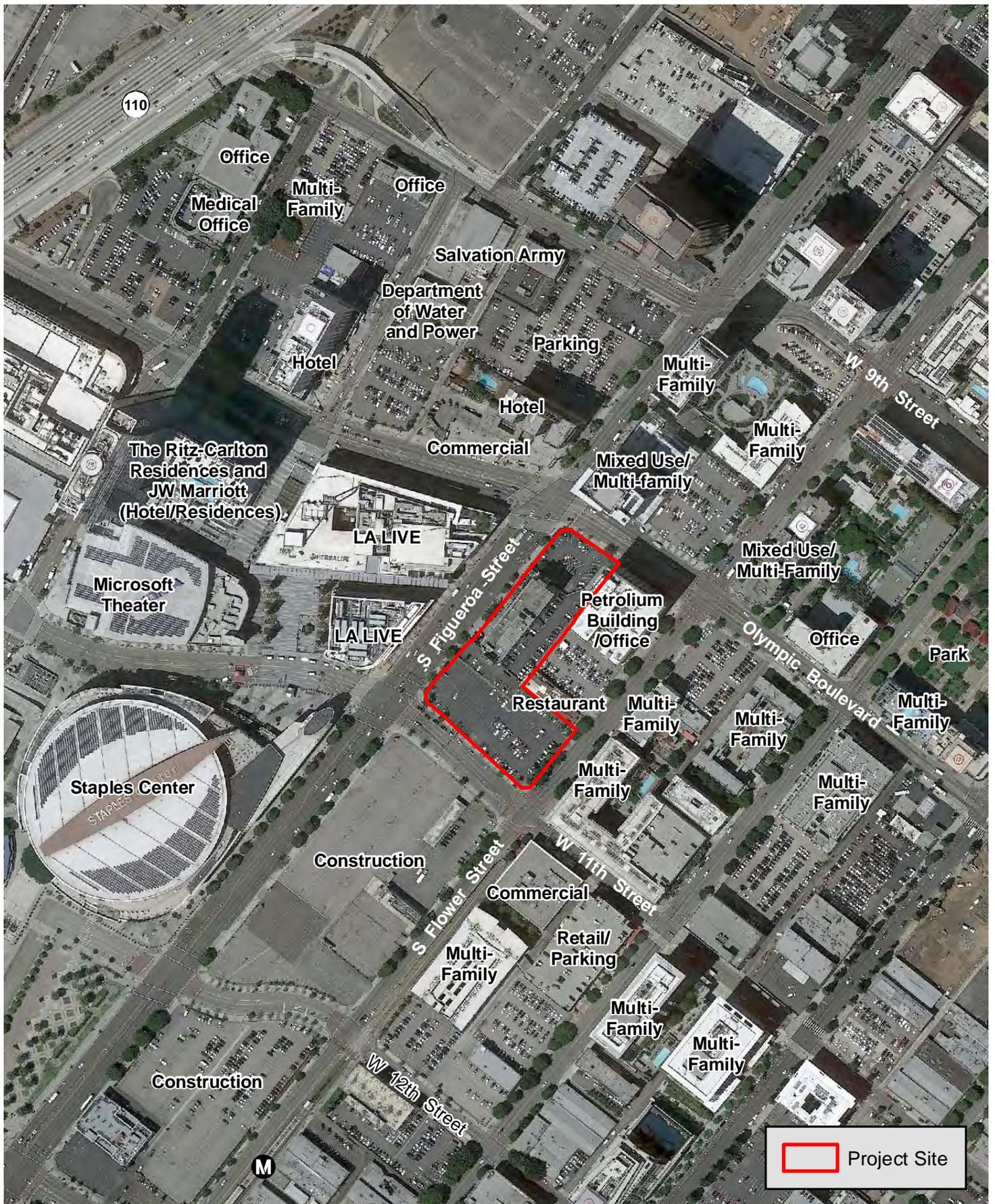


Regional and Site Location Map

FIGURE

A-1

1020 S. Figueroa Street Project
 Source: Google Maps, 2015; PCR Services Corporation, 2015.



Aerial Photograph of Project Site and Vicinity

FIGURE

A-2

Hazens' Downtown Towers Project

Source: Google Earth, 2014-04-23 (Aerial); PCR Services Corporation, 2015.

C. SITE BACKGROUND AND EXISTING SITE CONDITIONS

The 2.7 acre Project Site is currently developed with the Luxe City Center Hotel (Luxe Hotel) on the northwest portion of the Project Site with the remainder of the Project Site developed with surface parking. The Luxe Hotel is a 112,748 square foot, nine story, 100 feet tall building that includes 178 guest rooms, a main lobby, meeting space area, interior restaurant, an indoor/outdoor bar and lounge area (Nixon Bar and Lounge), fitness center, and a one-level parking deck with parking below and above the deck. The Luxe Hotel is a franchise of Luxe Hotels, but had originally been constructed as the Doric Hotel in 1964. During the 1970's, the hotel became a Holiday Inn, that was later expanded in 1989 and renovated in 2002. In 2008, the hotel transitioned from a Holiday Inn to a Luxe Hotel and underwent additional renovations in 2008 through 2013. The Luxe Hotel is situated between two surface parking lots which are also on the Project Site. The parking lot on the north corner of the Project Site at Olympic Boulevard and S. Figueroa Street is used for hotel guest parking and special event parking. A fenced portion of the parking lot at the south end of the Project Site is used by the Luxe Hotel for "overflow" parking, limousine staging, and construction/maintenance vehicle parking. The portion of this parking lot that fronts on 11th Street and is not fenced, is leased and operated by Flower Holdings, LLC as a paid parking lot for special event and public parking. Parking is also provided on the Project Site just east of the Luxe Hotel building on and below a one-level parking deck that serves as hotel guest and employee parking. The main entry drive for hotel visitors is accessed from S. Figueroa Street.

Existing landscaping on the Project Site is limited to a small number of ornamental street trees along S. Figueroa Street, 11th Street, Olympic Boulevard, and S. Flower Street. Landscaping within the Project Site boundaries includes a low landscaped planter area in front of the Luxe Hotel along S. Figueroa Street, and small ornamental trees and a small landscaped area in the north parking lot that fronts Olympic Boulevard. Several street trees are located along S. Figueroa Street, 11th Street, S. Flower Street, and Olympic Boulevard. No protected trees, as defined in the City of Los Angeles Municipal Code, are present on the Project Site.³ The Project Site is also adjacent to the Petroleum Building, a designated City Cultural-Historic Monument, located at 700-714 West Olympic Boulevard, the one-story El Cholo restaurant located at 1037 S Flower Street, and surface parking lots located at 1005-1023 S. Flower.

D. EXISTING PLANNING AND ZONING

The Project Site is located within the Central City Community Plan Area, the City Center Redevelopment Project Area, and the Los Angeles State Enterprise Zone. Although not located in the Los Angeles Sports and Entertainment District Specific Plan (LASED) and is subject to the Los Angeles Sports and Entertainment District Streetscape Plan. The Project is surrounded to the west and south by the LASED and the streets that surround the Project Site: including S. Figueroa Street; 11th Street; Olympic Boulevard; and S. Flower Street; are Under the Central City Community Plan, the majority of the property is designated as Regional Center Commercial on the western lots and High Density Residential on the southeastern lots. The Project Site is zoned C2-4D-O on the western lots which permits hotel, residential and commercial uses. The southeastern lots are zoned [Q] R5-4D-O which permits high density residential development. The D condition limits the maximum floor area (FAR) to 6:1, with an increase to a maximum FAR of 13:1 with a Transfer of Floor Area Rights (TFAR).

E. DESCRIPTION OF PROJECT

The Project would demolish the Luxe Hotel, surface parking, and related improvements on the Project Site in order to construct a new mixed-use hotel, residential and commercial development. Overall proposed uses are summarized in **Table A-1, Proposed Development Program**. A conceptual rendering of the Project is shown in **Figure A-3, Conceptual Site Plan**. Conceptual renderings of the Project is illustrated in **Figure A-4, Conceptual Rendering- Figueroa Street and Olympic Boulevard**, **Figure A-5, Conceptual Rendering-South Flower Street and West 11th Street**, and **Figure A-6, Conceptual Rendering- South Figueroa Street**. As indicated in Table A-1, and as further described below, the Project would include up to 1,129,284 sf of floor area (approximately 9.7:1 FAR) in three towers atop a Podium with three subterranean levels and eight levels above grade. In total, the Project would include up to 300 hotel rooms, up to 650 residential condominium units, and up to 80,000 sf of restaurant, retail, and other commercial uses at the first two levels along all street frontages with landscaped sidewalks and an open public Plaza along S. Figueroa Street adjacent to LA LIVE. The second level of the Podium would also include commercial uses. Parking for vehicles and bicycles would be provided within three subterranean levels and up to eight above grade levels within the Podium.

The Project would include two residential towers and one hotel tower. The 34 story Hotel Tower, located on the corner of 11th Street and S. Figueroa Street would include up to 300 hotel rooms, banquet, conference space and various amenities. The Residential Tower 1 would include up to 290 residential units and would be located at the corner of 11th Street and S. Flower Street. The Residential Tower 2 would include up to 360 residential units and would be located at the corner of S. Figueroa Street and Olympic Boulevard.

Each of the Project's components is described in greater detail below.

Hotel Tower

Proposed for development on the southwest portion of the Project Site directly across from Staples Center, the 34 story Hotel Tower, with a maximum height of 430 feet, would be designed as a high-quality hotel with up to 300 hotel rooms, along with banquet facilities, conference space and amenities, for a total of 280,000 sf of hotel use. Several amenities associated with the hotel would be located within a portion of the eighth level outdoor Podium Garden Terrace, including outdoor function areas, play and recreation areas, a dining and bar area, and areas for outdoor leisure activities. The Podium Garden Terrace would be finished with decorative pavers, turf, and landscaping. Additional amenities would also be located at the top/penthouse level of the Hotel Tower (Hotel Rooftop Amenity Deck), including a swimming pool, bar, spa tub, lounging area, and function space.

For hotel visitors and guests, a motor-court vehicle drop off area would front 11th Street and would include landscape and hardscape surfaces in a covered plaza-like arrangement. Parking for the hotel guests and visitors would be located in three levels of subterranean parking in levels three through eight within the Podium. A separate valet gate at the end of the motor-court vehicle drop off area would provide vehicle access for valets directly into the first level of subterranean parking.

³ *Tree Evaluation Report for the City Center Project Site, 1020 South Figueroa Street, City of Los Angeles, California, May 12, 2015*

Table A-1

Proposed Development Program

Total Uses:	Space
Residential	
Residential Units (Tower 1)	290 units
Residential Units (Tower 2)	360 units
<i>Total Residential Units</i>	650 units
Residential Floor Area (Tower 1)	341,467 sf
Residential Floor Area (Tower 2)	407,817 sf
Residential Amenities	20,000 sf
<i>Total Residential Floor Area</i>	769,284 sf
Hotel	
Hotel Rooms	300 rooms
Banquet Facilities	10,000 sf
Conference Facilities	6,000 sf
Amenities	16,665 sf
<i>Total Hotel Floor Area</i>	280,000 sf
Commercial	
Restaurant	40,000 sf
Retail/Commercial	40,000 sf
<i>Total Commercial Floor Area</i>	80,000 sf
Total Building Floor Area	1,129,284 sf
Open Space	
Private Open Space	27,000 sf
Public Open Space	48,880 sf
Total Open Space	75,800 sf

Source: PCR Services Corporation and Hazens Group, 2015

Residential Uses

Residential Tower 1, located at the southeast corner of the Project Site at the intersection of 11th Street and Flower Street, would be 32 stories above grade with a maximum height of 490 feet and would include up to 290 residential condominium units consisting of lofts, studios, one-bedroom, two-bedroom, three-bedroom units, and penthouse units. Residential Tower 2 would be located on the northwestern portion of the Project Site at the intersection of S. Figueroa Street and Olympic Boulevard. Residential Tower 2 would be 38 stories above grade, with a maximum height of 540 feet, and would include up to 360 units.

Amenities associated with the residential towers would include lobbies, fitness centers, and recreational space. Similar to the Hotel Tower, several amenities for residents would be located outdoors within the Podium Garden Terrace, including adult and children's pool areas, play and recreation areas, a spa and fitness center, areas for outdoor leisure activities, and strolling/exercise areas for pets. Additional amenities such as landscaping and lounging areas for the Residential Towers would be provided at the top/penthouse

level (Residential Rooftop Amenity Deck) of each tower, areas of which would be available exclusively to individual penthouse units.

Podium (Commercial Uses and Parking)

Construction of the Podium would support development of the Hotel Tower and residential towers and associated commercial uses and parking. The Podium area would include up to 80,000 sf of commercial uses, including 40,000 sf of retail/commercial use and 40,000 sf of restaurant uses located within two-stories fronting 11th Street, S. Figueroa Street, Olympic Boulevard, and S. Flower Street. Parking for hotel, commercial and residential uses would be provided in up to three subterranean levels and in levels three through eight above the commercial frontage. As discussed above, a Podium Garden Terrace that would include open space and amenities would be developed at the top of the Podium for use by residents and hotel guests.

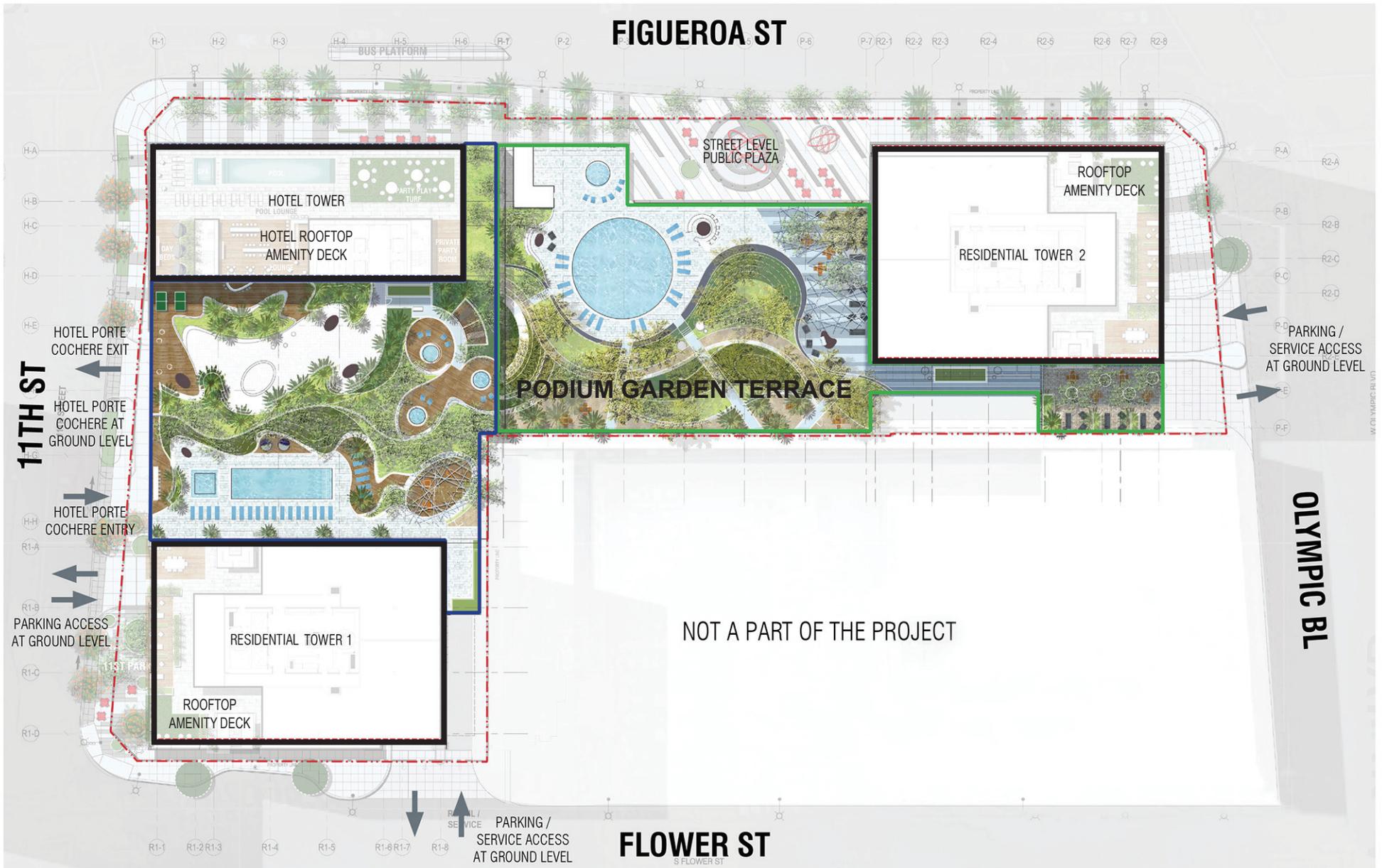
Project Design and Architecture

The Project features a contemporary architectural style that is designed to be compatible with the surrounding downtown urban environment. The Project has also been designed to respond to the context of the surrounding neighborhood, which includes an active, urban milieu adjacent to LA LIVE and other high tower mixed use buildings. As further described below, the design composition emphasizes pedestrian scale features such as street trees, other streetscape landscaping, wide sidewalks with parkways, a public plaza, and retail/restaurant store fronts along the Podium.

Positioned at opposite corners of the Project Site, the residential towers would have similar massing and sloping roof profiles that form an architectural composition that frames the site. While using similar architectural character, these towers are positioned in a staggered manner to allow for maximum daylight and view corridors within and through the Project Site. The design of the Hotel Tower would be a distinct massing arrangement, with a horizontal, terraced roof top. The three towers would collectively form the visual edges extending above the Podium.

The two residential towers include a series of balconies and façade treatments that provide visual surface texture, while actively shading the facades. The towers would be designed with colors and materials that are compatible with the surrounding urban development that could incorporate active gardens that further accent the facades. The towers would be clad with clear vision glass with low reflectivity. The Hotel Tower would also use clear vision glass with low reflectivity. The street-front commercial and restaurant space and the residential loft units located within the residential towers on levels three and above, would serve to visually screen all sides of the parking garage within the Podium from the exterior. The western façade of the Podium facing S. Figueroa Street and LA LIVE would include architectural treatments, such as folded sculptural aluminum screens and glass, and an active architectural lighting and graphic-art program, which would also serve to screen parking within the Podium, particularly along S. Figueroa Street.

The Project is designed to respect the context and character of the adjacent historic Petroleum Building by stepping back from the corner of S. Figueroa Street and Olympic Boulevard to allow views of the corner of the Petroleum Building. The design would also not obstruct views of the Petroleum Building's architecturally distinguished facades along Olympic Boulevard and Flower Street, which are primary character-defining facades featuring elaborate architectural detailing originally intended for public view. Although views of the west façade of the Petroleum Building would be obstructed by the Podium and





Conceptual Rendering - Figueroa Street and Olympic Boulevard

1020 S. Figueroa Street Project
Source: Gensler, 2015.

FIGURE
A-4



Conceptual Rendering-South Flower Street and West 11th Street

1020 S. Figueroa Street Project
Source: Gensler, 2015.



Residential Tower 2, it is a non-descript secondary façade of unadorned brick, simple design and materials which was intended to accommodate adjacent structures in the block and was not originally designed for public view. The west façade of the Petroleum Building has a tall solid brick wall that is covered almost entirely by a large sign, and a projecting rear wing punctuated by regularly spaced rectangular windows.

Cross sections of the Project as viewed from surrounding Streets are provided in **Figure A-7**, *Northwest Elevation - Figueroa Street*, **Figure A-8**, *Southwest Elevation - 11th Street*, **Figure A-9**, *Southeast Elevation - Flower Street*, and **Figure A-10**, *North Elevation - Olympic Boulevard*.

Open Space, Landscaping, and Public Art

Street fronts would include wide sidewalks with parkways, special paving, public art, rows of trees, and landscaped areas with groundcover, shrubs, vines and large planters. Landscaping would comply with City of Los Angeles Urban Forestry requirements, and would incorporate sustainable landscape design with native and drought tolerant vegetation, and use of water efficient irrigation systems. Street front edges would include landscaping and paving treatments as well as possible outdoor seating areas, and architectural lighting. Commercial frontages would also include floor to ceiling storefront display windows and street entrances. These elements would promote pedestrian activities and connections to interior uses.

A key feature of the design is the provision of a 5,000 sf public outdoor plaza along S. Figueroa Street that would support connectivity between the Project and LA LIVE while also encouraging pedestrian activity and an active streetfront. The outdoor plaza would incorporate landscape features, seating, and potential for public art display areas within this space. Behind and adjacent to the outdoor plaza would be commercial uses that would help activate the street edge and promote pedestrian activity.

Also, along 11th Street, in the hotel motor-court drop off area, a combination of landscape and hardscape treatments would be used in a covered plaza like arrangement for both arriving guests and other pedestrians. The Podium Garden Terrace would serve each of the three towers for Project residents, guests and hotel patrons. The Podium Garden Terrace would feature a bar and dining area near the Hotel Tower, open areas for adult and children recreational activities, pools, strolling/exercise areas for pets, and quiet/passive areas with shaded zones. The Podium Garden Terrace would be finished with concrete pavers, turf, and landscaping. The top level of the residential towers would include rooftop amenity decks, and the top/penthouse level of the Hotel Tower would include a rooftop amenity deck with a pool, bar, lounge, and greenspace areas for hotel patrons and visitors.

Street lighting and architectural lighting would be incorporated into the design, accenting building features and adding to the pedestrian areas, while addressing safety and security of the complex. Architectural lighting would be in compliance with City code requirements.

The Project would incorporate an active art program in conjunction with the overall street front and landscape design. Art installations may occur at the public plaza as sculptures, and/or on building facades in both fixed and interchangeable media to add visual interest and the pedestrian experience along Project street fronts. Art installations are also being considered for the Podium Garden Terrace and other residential and hotel spaces. Public art would be designed as part of the Project.

Access, Circulation, and Parking

Vehicular access into the Podium would be from Olympic Boulevard, S. Flower Street and 11th Street. Parking access to the Podium for residences and commercial visitors would be from Olympic Boulevard via one four lane driveway (two lanes for ingress and two lanes for egress). For residents-only, a two lane driveway (one lane for ingress and one lane for egress) would be provided from 11th Street. A vehicle entryway to the Podium from S. Flower Street would be provided for commercial visitors and service vehicles.

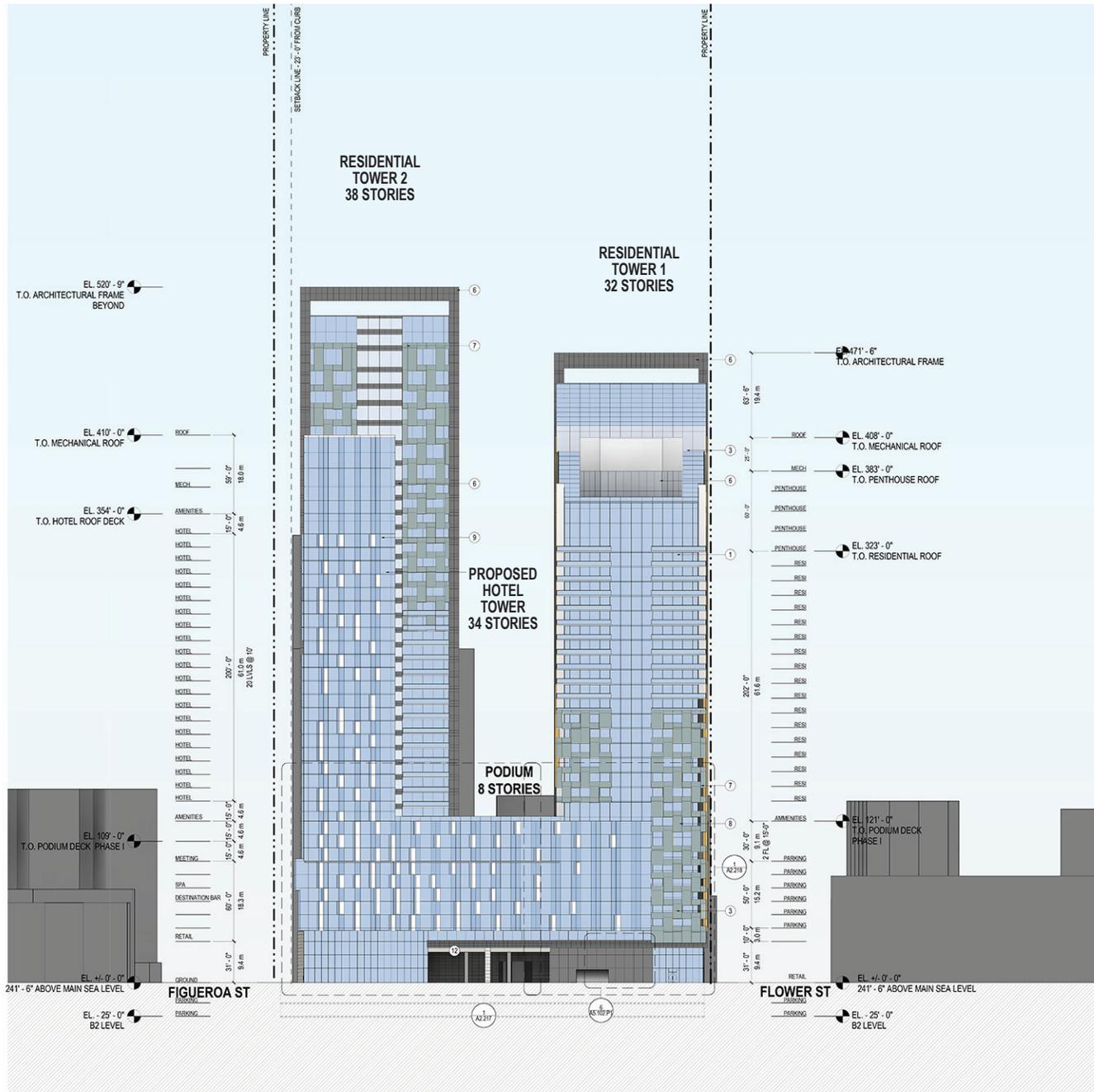
For hotel visitors, a separate hotel-only motor-court drop off area would be provided off of 11th Street. A separate valet gate within the property at the interior of the motor-court area would provide access for valets to park hotel guest vehicles directly into the first level of subterranean parking. Loading for service vehicles related to hotel, residential and commercial uses would be on the ground level, interior to the Project Site. Pedestrian access to the Hotel Tower and lobby would be from a hotel motor-court on 11th Street and from the hotel lobby fronting S. Figueroa Street.

Pedestrian access to the two stories of commercial and restaurant frontage along the periphery of the Podium fronting 11th Street, S. Figueroa Street, S. Flower Street, and Olympic Boulevard would be directly from those streets at the ground level or via elevators, stairs or escalators. Access would also be provided from the parking areas with the Podium. The majority of the retail and restaurant frontage would be located along S. Figueroa Street, with individual street level entryways. Access to second floor retail uses along S. Figueroa would be provided by elevators, stairs, or escalators from the outdoor public plaza. Each residential tower would have a ground level lobby that would be accessible from street level or via elevators from the residential parking areas within the Podium. Pedestrian access to the lobby for Residential Tower 1 at the corner of 11th Street and S. Flower Street would be from S. Flower Street. Pedestrian access to the lobby of Residential Tower 2 at the corner of S. Figueroa Street and Olympic Boulevard would be from Olympic Boulevard.

As previously indicated, automobile parking would be provided in three subterranean levels and in levels three through eight within the Podium. Parking will be provided in compliance with LAMC requirements. Bicycle parking would be provided at the ground level and in the subterranean parking and/or within the Podium in compliance with LAMC requirements.

Lighting, Signage, and Public Art

The signage program for the Project is intended to create integrated graphic content through both fixed and electronic media. The graphics and signage program would support an active street front experience on all sides, but particularly along the Figueroa corridor that would mix art and signage graphic components. New lighting would also include building identification, commercial accent lighting, wayfinding, balcony lighting, and security markings. Pedestrian areas including pathways and entryways into the Project would be well-lit for security. The Project would require an Annexation into the adjacent Figueroa and Olympic Sign District to allow off-site signage and allow a greater flexibility of signage options.



Southwest Elevation - 11th Street

1020 S. Figueroa Street Project
Source: Gensler, 2015.

FIGURE
A-8



The building signage would include on-site directional and way-findings signage, building identification signage, retail and restaurant tenant signage, hotel identification signage, and other similar signs. The types of signs may include high-rise building branding signage located on the upper levels of the three towers, street-level marquees at building lobbies, parking and pedestrian wayfinding signage along key streetfront exposures, and individual signs above commercial tenant spaces.

The Project would also include off-site signage that would reinforce the pedestrian character of the streets surrounding the Project Site in keeping with the surrounding vibrant and colorful signage surrounding the LA LIVE signage and nearby development. Digital signs totaling up to approximately 28,500 sf would be directed away from residential buildings and would be located within the Podium levels on Olympic Boulevard, S. Figueroa Street, and 11th Street, primarily facing toward LA Live and the commercial uses along Figueroa Street (**Figure A-11**, *Rooftop Marquee and Podium Level Signage*). The off-site signage would include supergraphic signs, wall signs, projecting signs, digital display signs, and integral digital display signs, and may include continuous animation.

Site Security

The Project would provide an extensive security program, 24 hours per day/seven days per week, to ensure the safety of residents, hotel guests and other visitors to the Project Site. The Project would incorporate Crime Prevention Through Environmental Design (CPTED) strategies in design and planning, as well as active security features. In each tower and in the Podium areas, state-of-the-art security technology would be employed. These features include comprehensive coverage and monitoring of key areas through Close Circuit Television systems (CCTV). Access to non-public areas of the Project would be restricted by electronically controlled and locking access cards. Full time 24-hour, security would be provided including security/concierge desks in each residential and hotel tower along with roving patrols. Security personnel duties would include but not be limited to assisting residents and visitors with Project Site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. Initial alarms such as intruder alarms or duress alarms would be the responsibility of site security personnel as first responders. Access to parking areas would be secured. Valet parking would be provided for hotel guests.

Sustainability Features

The Project would be designed to exceed the standards of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design® (LEED®) Certified level.

The Project would also comply with the Los Angeles Green Building Code, which builds upon and sets higher standards than those incorporated in the 2010 California Green Building Standard Code, or CALGreen. A sustainability program would be prepared and monitored by an accredited design consultant to provide guidance on Project design, construction and operations; and performance monitoring during Project operations to reconcile design and energy performance and enhance energy savings. Some of the Project's key design features that contribute to energy efficiency include the installation of energy efficient appliances, water efficient irrigation systems, water efficient indoor fixtures, use of locally sourced construction materials, and the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into 10 percent of the parking spaces. The Project would achieve several objectives of the City of Los Angeles General Plan Framework Element, Southern California Association of Governments Regional Transportation Plan, and South Coast Air Quality Management District Air Quality Management Plan for establishing a regional land use pattern that promotes sustainability.

The Project would support pedestrian activity in the downtown Los Angeles area, and contribute to a land use pattern that addresses housing needs and reduces vehicle trips and air pollution by locating residential uses within an area that has public transit (with access to the Metro rail lines and existing regional bus service), and employment opportunities, restaurants and entertainment all within walking distance. Further, the Project's inclusion of bicycle parking, as discussed above, would encourage the use of alternative modes of transportation.

Construction Schedule

The Project will be constructed in two phases. Construction is expected to commence in the third quarter of 2017 with the first phase completed in the second quarter of 2020. The second phase will be completed in the first quarter of 2023. During construction, vibration monitoring and other actions would be taken to reduce any potential vibration effects on the adjacent Petroleum building.

Vesting Tentative Tract Map

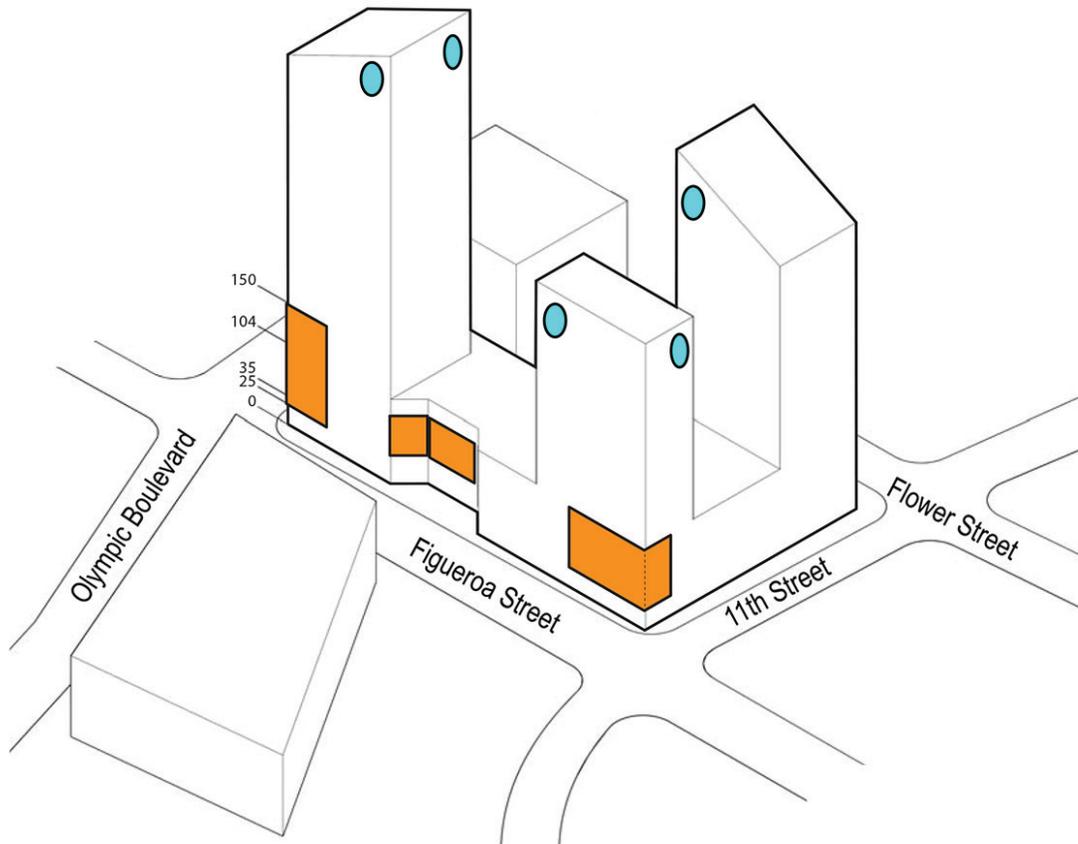
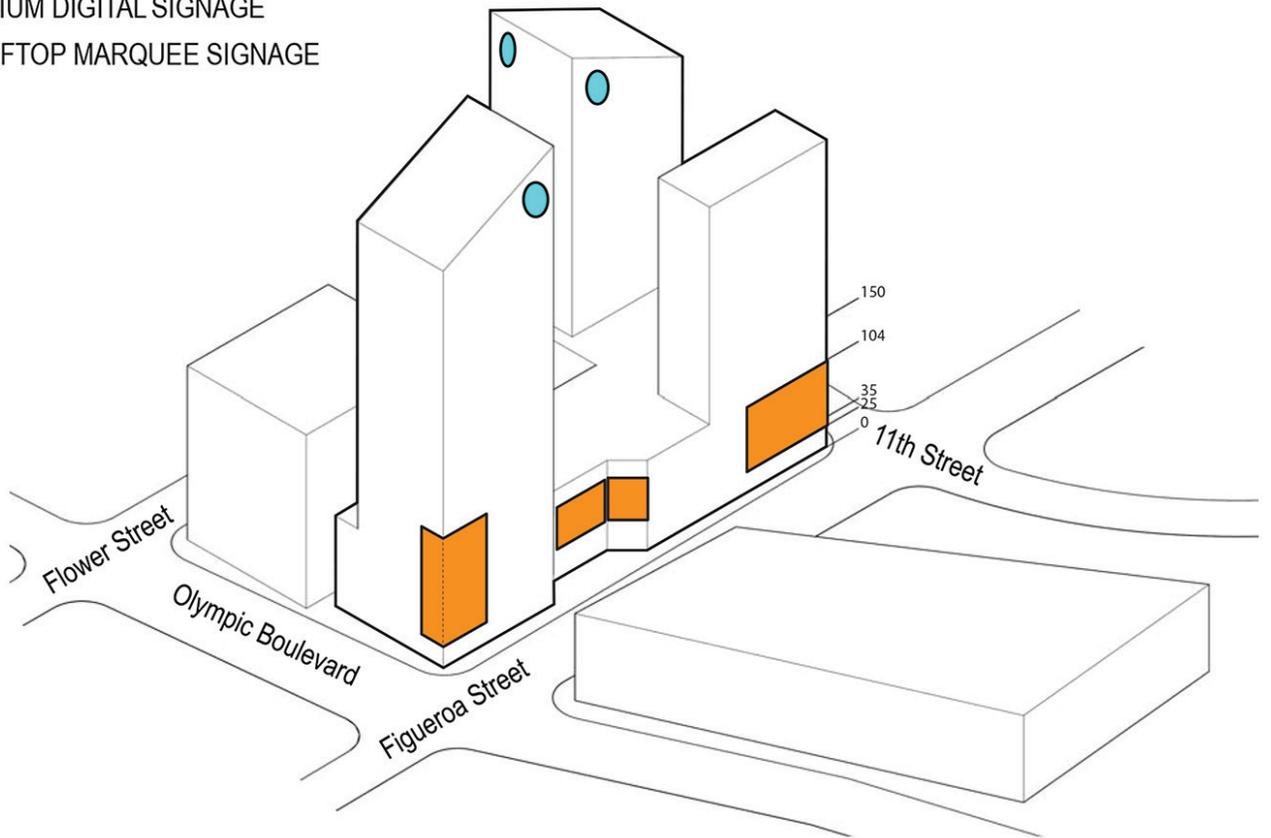
The Project includes a vesting Tentative Tract Map with a total of 47 lots, including two master lots.

F. ANTICIPATED PROJECT APPROVALS

Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but would not necessarily be limited to, the following:

- Certification of an Environmental Impact Report;
- Development Agreement by and between the City of Los Angeles and the Applicant, pursuant to California Government Code section 65864 et seq;
- Transfer of Floor Area Rights (TFAR) pursuant to LAMC Sections 14.5.6 and 14.5.8 through 14.5.12 from the Los Angeles Convention Center (City Owned Donor Site) at 1201 S. Figueroa Street, to the subject site, located at 1020 S. Figueroa Street, Los Angeles allowing an FAR of 9.7:1 and 1,129, 284 sf in lieu of a 6:1 FAR;
- Amendment to the Figueroa and Olympic Sign District to include the Project;
- Determination under the City Center Redevelopment Plan, as necessary to allow a residential use in a commercial zone or a commercial use in a residential zone;
- Master Conditional Use Permit for the sale and service of alcohol and live entertainment (LAMC § 12.24.W.1 and W18);
- Site Plan Review for a project resulting in an increase of 50 residential units and greater than 50,000 sf of nonresidential floor area. (LAMC § 16.05);
- Vesting Tentative Tract Map (LAMC § 17.15);
- Variance to allow reduced parking for Phase I;

- █ PODIUM DIGITAL SIGNAGE
- ROOFTOP MARQUEE SIGNAGE



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- Variation from Downtown Design Guidelines;
- Other approvals as needed and as may be required such as construction permits, including building permits, grading, excavation, foundation, and associated permits;
- Haul route permit, as may be required; and
- Other approvals as needed and as may be required.

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ATTACHMENT B: EXPLANATION OF CHECKLIST DETERMINATIONS

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 topics that are expected to be addressed in an Environmental Impact Report (EIR) and demonstrate why other topics are not expected to result in 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 the topics will be addressed in an EIR with conclusions regarding impact significance reached as part of the EIR analysis.

I. AESTHETICS

Would the project:

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

Potentially Significant Impact. The Project Site is located within the highly urbanized downtown area of Los Angeles and adjacent to the Los Angeles Sports and Entertainment District (LASED), an active regional entertainment/mixed-use district. Visual resources of merit in the Project vicinity include the high-rise skyline and urban corridors of downtown Los Angeles and the entertainment-related features of nearby development such as LA LIVE (e.g., pedestrian plazas, signage) of the LASED. The adjacent 11-story Petroleum Building to the east is a designated City historical resource (LA #596). Other historical buildings are located in the Project vicinity. The Project would replace the existing nine-story Luxe City Center Hotel and on-site parking areas with a mixed-use development consisting of two residential towers and one hotel tower atop an eight-story Podium structure containing parking and commercial uses. The three towers would rise to a height of 430, 490, and 540 feet above grade, contributing to the downtown Los Angeles urban skyline. The Project would alter the visual conditions on the Project Site and could have an effect on scenic vistas from some locations in the vicinity of the Project Site. Thus, it is recommended that this issue be analyzed further in an EIR.

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

Potentially Significant Impact. The Project Site is not located along a designated City- or State-designated scenic highway or associated view corridor.¹ However, the downtown Los Angeles skyline is comprised of numerous City-designated historical resources, including the adjacent 11-story Petroleum Building (LA #596). The introduction of three new high-rise towers and a Podium structure may affect historic resources in the downtown Los Angeles area, including views of the Petroleum Building. Therefore, it is recommended that this topic be analyzed further in an EIR.

¹ *City of Los Angeles General Plan Transportation Element, Map E: Scenic Highways In the City of Los Angeles. June 1998.*

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

Potentially Significant Impact. The Project would replace the existing nine-story Luxe City Center Hotel and on-site parking areas with a contemporary mixed-use development consisting of three towers and an eight-story (above grade) Podium structure. The three towers would rise to a height of 430, 490, and 540 feet above grade, and the Project would provide up to approximately 1.13 million square feet of floor area, comprised of residential, hotel, and commercial uses. As the Project would alter the visual character of the Project Site and its surroundings by increasing the height and density of on-site development, it is recommended that this issue be analyzed further in an EIR.

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

Potentially Significant Impact. The Project Site lies within the highly urbanized downtown area of Los Angeles and adjacent to the LASED, an active regional entertainment and mixed-use district. At night, the surrounding development generates moderate to high levels of interior and exterior lighting related to special event, security, parking, architectural and landscaping/decorative lighting. Static and animated illuminated signage, street lights, and traffic on local streets also contribute to the ambient light levels in the area. The Project would contribute to ambient nighttime illumination as the Project's new architectural lighting, security lighting, ground-level commercial uses, lobby entrances, illuminated signage, and digital display signs are expected to increase light levels over existing conditions. Some lighting elements would be visible from nearby off-site vantages, including nearby residential uses east of the Project Site. In addition, the Project would introduce new building surface materials to the Project Site with the potential to generate glare. Therefore, it is recommended that light and glare effects be analyzed further in an EIR.

Shading impacts are influenced by the height and bulk of a structure, the time of year, the duration of shading during the day, and the proximity of shade-sensitive land uses, or receptors. The Project vicinity is characterized by a number of medium- and high-density residential and commercial uses, some of which may be considered shade-sensitive receptors. As the Project would increase the height and massing of on-site development, and thus, the potential area of shading, it is recommended that this topic be analyzed further in an EIR.

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 Dept. 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 (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site, which is located in Downtown Los Angeles, has been developed with hotel and parking uses since approximately 1964. No agricultural uses or related operations are present within the Project Site or in the surrounding highly urbanized area. As such, the Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.² Since the Project would not convert farmland to non-agricultural uses, there would be no impact. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The majority of the Project Site (western portion fronting S. Figueroa Street) has a General Plan designation of Regional Center Commercial and is zoned C2-4D-O (Commercial Zone). The southeast portion of the Project Site has a General Plan designation of High Density Residential and is zoned [Q] R5-4D--O (Multiple Dwelling Zone). The Project Site is currently occupied by the Luxe City Center Hotel and associated parking uses. No agricultural zoning is present in the Project vicinity, and no nearby lands are enrolled under the Williamson Act. As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and there would be no impact. No further analysis of this topic in and EIR is necessary, and no mitigation measures are required.

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))?

No Impact. As discussed in Checklist Question II(b), the Project Site is zoned C2-4D-O (Commercial Zone) and [Q]R5-4D-O (Multiple Dwelling Zone). The Project Site is currently occupied by the Luxe City Center Hotel and associated parking uses. Furthermore, consistent with the urbanized area surrounding the Project Site, the larger Project vicinity is zoned for commercial and residential uses. No forest land or land zoned for timberland production is present on the Project Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, and there would be no impact. No further analysis of this topic in an EIR is necessary, and no mitigation measures are required.

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

No Impact. The Project Site is currently developed and no forest land exists in the Project vicinity. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and there would be no impact. No further analysis of this topic is necessary and no mitigation measures are required.

² California Department of Conservation, Division of Land Resource Protection, *Farmland Mapping and Monitoring Program Los Angeles County Important Farmland 2012*. Available at: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf> Accessed December 21, 2015.

- 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. There are no agricultural uses or related operations on or near the Project Site, which is located in the highly urbanized Downtown portion of the City of Los Angeles. Therefore, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur. No further analysis of this topic is necessary and no mitigation measures are required.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district 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. The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) together with the Southern California Association of Governments (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current Air Quality Management Plan (AQMP) was adopted December 7, 2012 and outlines the air pollution control measures needed to meet Federal particulate matter (PM_{2.5}) standards by 2015 and ozone (O₃) standards by 2024. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve Federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several Federal planning requirements and incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from that included in earlier AQMPs. The Project would support and be consistent with several key policy directives set forth in the AQMP. For example, the Project would provide for new residential, hotel, and commercial uses in proximity to commercial and entertainment activities as well as a range of employment opportunities, locate new development in proximity to existing public transit facilities including various bus stops and would redevelop a Project Site already served by existing infrastructure. Notwithstanding these attributes, the Project has the potential to increase the amount of traffic in the area which would consequently generate operational air emissions that could affect implementation of the AQMP. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, it is recommended that this topic be analyzed further in an EIR.

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

Potentially Significant Impact. The Project Site is located within the Basin, which is characterized by relatively poor air quality. State and Federal air quality standards are often exceeded in many parts of the Basin, with Los Angeles County among the highest of the counties that comprise the Basin in terms of non-attainment of the standards. The Basin is currently in non-attainment for O₃, particulate matter less than 10 microns in diameter (PM₁₀)³, and PM_{2.5} on Federal and State air quality standards. The Project would result

³ As noted in the 2012 AQMP, the Basin has met the PM₁₀ standards at all stations and a request for re-designation to attainment status is pending with U.S. Environmental Protection Agency.

in increased air emissions associated with construction and operational traffic. Therefore, it is recommended that this topic be analyzed further in an EIR.

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. As discussed in Checklist Question III(b), the Project would result in increased air emissions from construction and operational traffic in the Basin, an air quality management area currently in non-attainment of Federal and State air quality standards for O₃, PM₁₀, and PM_{2.5}. As such, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact when combined with other existing and future emission sources in the project area. Therefore, it is recommended that this topic be analyzed further in an EIR.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located in the downtown area of Los Angeles, which includes a mix of uses, including residential and other sensitive uses, in the immediate Project vicinity. Construction activities and operation of the Project could increase air emissions above current levels, thereby potentially affecting nearby sensitive receptors. Therefore, it is recommended that this topic be analyzed further in an EIR.

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

Less Than Significant Impact. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project involves a mixed-use development, including residential, hotel, and commercial uses, 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) and occasional minor odors generated during food preparation activities. Thus, Project operation is not expected to create objectionable odors. Activities and materials associated with construction would be typical of construction projects of similar type and size. On-site trash receptacles would be covered and properly maintained in a manner that promotes odor control. Any odors that may be generated during construction of the Project would be localized and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by South Coast Air Quality Management District (SCAQMD) Rule 402. Impacts with regard to odors would be less than significant. No further analysis of this topic is necessary and no mitigation measures are required.

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, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

No Impact. The Project Site is located in the highly urbanized downtown area of Los Angeles and is occupied by the Luxe City Center Hotel and associated parking areas. Landscaping primarily consists of perimeter street trees, although several trees are located interior to the Project Site and a small landscaped area is located at the hotel entrance that includes a planter area with grass and low level landscaping. Trees interior to the Project Site include acacia, Indian laurel fig, goldenrain tree, southern magnolia, London plane tree queen palm, and Mexican fan palm. Street trees that occur along the perimeter of the Project Site include Indian laurel fig along S. Figueroa Street and Flower Street; goldenrain trees along 11th Street; southern magnolias along Olympic Boulevard; and London plane trees along S. Figueroa Street. No protected trees, as defined by the City of Los Angeles Municipal Code (LAMC), are present on-site.^{4,5} That said, four trees interior to the Project Site meet the minimum threshold for significant, non-protected trees (i.e., trees with a trunk diameter at breast height [dbh] that exceeds 8 inches). These include three acacia trees and one Indian laurel fig tree. Another ten street trees (nine Indian laurel fig trees, one southern magnolia) also meet the criteria of being significant, non-protected trees. Because of the urbanized nature of the Project Site and Project vicinity, the Project Site does not support habitat for candidate, sensitive, or special status species. Therefore, no impacts to candidate, sensitive, or special status species would occur. No further analysis of this topic in an EIR is necessary, and no mitigation measures are required.

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

No Impact. As discussed in Checklist Question IV(a), the Project Site and surrounding area are located in the highly urbanized downtown area. The Project Site does not contain any riparian habitat or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife (formally California Department of Fish and Game) or US Fish and Wildlife Service. Furthermore, the Project Site is not located in or adjacent to a Significant Ecological Area as defined by the City of Los Angeles.⁶ Therefore, the Project would not have an adverse effect on any riparian habitat or other

⁴ *Tree Evaluation Report for the City Center Project Site, 1020 South Figueroa Street, City of Los Angeles, California, October 2015 (Appendix A-1)*

⁵ *LAMC Section 17.02 defines "protected trees" as any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one half feet above the ground level at the base of the tree.: a) Oak tree including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa); b) Southern California Black Walnut (Juglans californica var. californica); c) Western Sycamore (Platanus racemosa) and ;d) California Bay (Umbellularia californica).*

⁶ *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, at page 2.18-1 through 2.18-13; <http://cityplanning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf>.*

sensitive natural community. No further analysis of this topic is necessary in an EIR and no mitigation measures are 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. As discussed in Checklist Question IV(a), the Project Site is located in the highly urbanized downtown area and is currently developed. The surrounding area is fully developed with urban uses, associated infrastructure, and surface parking areas. The Project Site does not contain wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on federally protected wetlands. No further analysis of this topic in an EIR is necessary and no mitigation measures are 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?

No Impact. As stated in Checklist Question IV(a), the Project Site is developed with the Luxe City Center Hotel and associated parking areas. Due to the highly urbanized nature of the Project Site and surrounding area, the lack of a major water body, as well as the limited number of ornamental trees on the Project Site, most of which are not mature, the Project Site does not contain substantial habitat for native resident or migratory species, or native wildlife nursery sites. Therefore, the Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

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

Less than Significant. As stated in Checklist Question IV(a), the Project Site is developed with the Luxe City Center Hotel and associated parking areas, with limited landscaping. No locally protected biological resources, such as oak trees or California walnut woodlands, or other trees protected under the City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC, exist on the Project Site. However, there are decorative/ornamental trees located within the Project Site or along the public street frontages facing the Project Site. Project construction proposes to remove existing trees from the Project Site. However, it is the City's policy to retain or replace any street trees removed during Project development. Specifically, the City's policy is to replace all significant, non-protected trees (8 inch or greater or cumulative trunk diameter if multi-trunked, as measured 54 inches above ground) at 1:1 ratio with a minimum of 24-inch box tree. Further, per the City's Street Tree policies, the City Department of Public Works' Urban Forestry Division's policy is to replace street trees removed during the construction of a project. Therefore, any street trees or trees interior to the Project Site that would be removed as part of the Project would be replaced in accordance with the City's policies. Prior to the issuance of any permit, during plan check review, the Applicant would be required to submit a plot plan demonstrating a minimum 1:1 replacement ratio of existing significant, non-protected trees. Further, approval a Tree Removal Permit by the Board of Public Works per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services, would be required prior to issuance of a Certificate of Occupancy. Review and approval of

the Tree Removal Permit would ensure street trees are replaced in accordance with City policy. All other landscaping would comply with all requirements of the LAMC and the City's Urban Forestry requirements. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources, and impacts are less than significant. No further analysis of this topic in an EIR is necessary.

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. As discussed in Checklist Question IV(a), the Project Site is located within a developed, urbanized area and does not provide habitat for any sensitive biological resources. The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan.⁷ Therefore, the Project would not conflict with the provisions of any adopted conservation plan, and no impact would occur. No further analysis of this topic is necessary in an EIR and no mitigation measures are required.

V. CULTURAL RESOURCES

Would the project:

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

Potentially Significant Impact. The Luxe City Center Hotel was built in 1964 and meets the 45-year age guideline of the California Register of Historical Resources (California Register) to be evaluated for its potential as a historical resource. In addition, located immediately adjacent to the Project Site at 700-714 West Olympic Boulevard and 1001-1013 South Flower Street is the Petroleum Building, which was built in 1925 and designated as City Monument No. LA #596 on April 26, 1994. There are also several other buildings over 45 years in age in the Project vicinity. These include the 1100 South Flower Street building located at the intersection of Flower and 11th Streets that was constructed in 1920 and the 1037 S. Flower Street building behind the Luxe City Center Hotel to the south that is a Spanish Colonial Revival structure constructed in approximately 1930. The Project would result in the demolition of the Luxe City Center Hotel and the construction of a mixed-use project adjacent to a designated City Monument and within the vicinity of several other buildings over 45 years in age. As a result, it is recommended that the potential for direct and indirect impacts to historical resources be analyzed further in an EIR.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within a highly urbanized

⁷ California Department of Fish and Wildlife, *Habitat Conservation Planning, Natural Community Conservation Planning, Summary of Natural Community Conservation Plans (NCCPs)*, August 2015. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=15329&inline>. Accessed December 21, 2015.

area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have been previously disturbed. Nonetheless, Project construction would require excavation for subterranean parking levels, and other grading and excavation activities that could have the potential to disturb existing but undiscovered archaeological resources. Therefore, it is recommended that this topic be further analyzed in an EIR to determine the potential for, and significance of, any impacts on archaeological resources.

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

Potentially Significant Impact. The Project Site does not contain any unique geologic features and is not known to have yielded previous vertebrate paleontological resources.⁸ Fill material extends to a depth of three to eight feet under the Project Site. Native soils underlying the fill material are made up of recent-age ("Younger") Alluvium (Qal) consisting of clay, silt, sand, and gravel which are unconsolidated, and range from poorly to well stratified. The area of Qal includes alluvial fan, flood plain, and streambed deposits. Since the Project would require excavation for subterranean parking and building foundations that would extend into native soils that might contain undiscovered paleontological resources, it is recommended that this topic be analyzed further in an EIR to determine the potential for, and significance of, any impacts on paleontological resources.

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

Less Than Significant Impact. No known traditional burial sites or other type of cemetery usage has been identified within the Project Site. In addition, as previously indicated, the Project Site has been previously graded and developed. Nonetheless, the Project Site would require excavation that would extend into native soils. Thus, the potential exists to encounter human remains during excavation activities. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, construction excavations shall be halted and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission shall be consulted to designate a Most Likely Descendant who shall recommend appropriate measures to the landowner regarding the treatment of the remains. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

VI. GEOLOGY AND SOILS

Would the project:

- 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**

⁸ Los Angeles Citywide General Plan Framework Draft EIR, Figure CR-2, January 1995.

substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The following impact analysis pertaining to the Project Site's underlying geology and soils are based, in part, on information contained in the *Geotechnical Engineering Investigation: Proposed City Center Hotel and Residential Development, 1020 South Figueroa Street, Los Angeles, California* (Geotechnical Investigation) prepared by Geotechnologies, Inc. in May 2015 and revised in December 2015. The findings and Project-specific recommendations of the Geotechnical Investigation were approved by the Los Angeles Department of Building and Safety in a Soils Report Approval Letter dated January 13, 2016, Log #91304. The Soils Report Approval Letter and Geotechnical Investigation is included as Appendix C-1 of this Initial Study. The Geotechnical Investigation includes Site-specific design recommendations to reduce the potential for impact from strong seismic ground shaking; seismic-related ground failure, including liquefaction; unstable soil that could potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse; and expansive soils. These recommendations are referenced in the analyses below.

The seismically active region of southern California is crossed by numerous active and potentially active faults and is underlain by several blind thrust faults. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those that have shown evidence of movement within the past 11,000 years (i.e., during the Holocene Epoch). Potentially active faults are those that have shown evidence of movement between 11,000 and 1.6 million years ago (i.e., during the Pleistocene Epoch). Inactive faults are those that have exhibited displacement greater than 1.6 million years before the present (i.e., during the Quaternary Epoch). Blind thrust faults are low angle reverse faults with no surface expression. Due to their buried nature, the existence of blind thrust faults is usually not known until they produce an earthquake.

Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The CGS has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. In addition, the City of Los Angeles General Plan Safety Element has designated fault rupture study areas extending along each side of active and potentially active faults to establish areas of hazard potential due to fault rupture.

The Project Site is not located with an Alquist-Priolo Earthquake Fault Zone, and based on a research of available literature, no known active or potentially active faults underlie the Project Site. The closest Alquist-Priolo Earthquake Fault Zone to the Project Site is associated with the Hollywood Fault, located approximately five miles north-northwest of the Project Site; the second closest is associated with the Newport-Inglewood Fault, located approximately 5.6 miles to the southwest.^{9,10} Several Quaternary faults (non-active faults) are also located greater than 5 miles from the Project Site. The two closest blind thrust faults to the Project Site are the Puente Hills Blind Thrust Fault, with the potentially active segment of the

⁹ California Geological Survey, *Earthquake Zones of Required Investigation: Hollywood Quadrangle*. November 6, 2014. Available at: http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf Accessed December 21, 2015.

¹⁰ California Geological Survey, *Special Studies Zones: Inglewood Quadrangle*. July 1, 1986. Available at: <http://gmw.consrv.ca.gov/shmp/download/quad/INGLEWOOD/maps/INGLEWOOD.PDF> Accessed December 21, 2015.

fault located 2.5 miles southwest of the Project Site, and the Elysian Park Thrust Fault, which generally underlies the southwest portion of the Los Angeles Basin, with the active segment of the fault located approximately 3.75 miles southwest of the Project Site. Based on this information, the Geotechnical Investigation concluded that the potential for ground surface rupture at the Project Site is low, and thus, the Project would not expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, impacts from fault rupture would be less than significant. No further analysis of this topic is necessary in an EIR and no mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within the seismically active Southern California region and is not exposed to a substantial greater than normal seismic risk than other properties in the City. The level of ground shaking that would be experienced at the Project Site from active or potentially active faults or blind thrust faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology. The active faults that could produce shaking at the Project Site are the same faults discussed in Checklist Question VI(a)ii above, plus the Whittier-Elsinore Fault, San Jacinto Fault, San Andreas Fault and numerous other smaller faults and blind thrust faults found throughout the region.

Based on the Project Site's relationship with known faults and the results from on-site soil borings, the Geotechnical Investigation concluded that the Project Site is classified by the 2013 California Building Code (CBC) as Site Class C, which corresponds to a "Very Dense Soil or Soft Rock" Profile. According to borings conducted on-Site for the Geotechnical Investigation, seismic measurements resulted in an average shear wave velocity of 1,460 feet per second between 0 and 100 feet, and 1,660 feet per second between 30 and 130 feet. Based on the Project Site's relationship with known faults, the Geotechnical Investigation concluded that the maximum considered spectral response for an earthquake is 2.315g. During a one-second period, the maximum spectral response is anticipated to be 1.058g. This is considered to be the design seismic event, or design earthquake, for the Project Site.

While it is likely that future earthquakes produced in southern California would shake the Project Site, modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels and other forms of building reinforcement. As with any new construction in the City and State, design and construction techniques for the Project would be required to conform to the current seismic design provisions of the 2013 CBC (as amended by the City's Building Code), which incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to applicable recommendations provided in the Geotechnical Investigation, to minimize seismic-related hazards.

The recommendations of the Geotechnical Investigation are based on a Site investigation that included soil borings completed in February 2015 to a depth of between of 80 and 130 feet, as well as Project-specific design requirements. The soil borings found that fill materials underlying the Project Site consist of silty sands to a depth of 3 to 8 feet, underlain by native soils consisting of silty sands to gravelly sands, with occasional layers of sandy and clayey silts. Groundwater was not encountered during the borings. The design requirements found that average bearing (downward) pressures for the towers will be on the order of 6,000 to 8,000 pounds per square foot (psf).

Based on these findings, the Geotechnical Investigation found that the underling fill materials are not suitable to support the proposed structures, however, excavation of the proposed subterranean levels would remove the fill materials and expose the underlying native soils. The native soils are very dense to very stiff and the proposed structures may be adequately supported on the underlying soils through the use of mat foundations for the towers and conventional foundations for the podium structures. Mat foundations designed in accordance with the average bearing pressures stated above would achieve a factor of safety of 3. All continuous pour foundations are recommended to be reinforced with a minimum of #4 steel rebar. The Geotechnical Investigation found that resistance to lateral loading (side-to-side loading caused during a seismic event) could be provided by friction acting at the base of the foundations and by passive earth pressure, provided that the recommendations of the Geotechnical Investigation are followed. Recognizing that some differential settlement would be expected at all buildings during a seismic event, the Geotechnical Investigation nonetheless concluded that the differential settlement between the podium column footings and the edges of the tower mat foundations would be minimal (i.e., 3/4-inch) when designed in accordance with applicable regulations and the Project-specific recommendations. Retaining walls greater than 6 feet in height are recommended to be designed with a triangular pressure distribution, with an equivalent fluid pressure of 26 pounds per cubic foot, upon which they would be adequate to withstand the design earthquake. It is further recommended that native soils below the foundations are compacted to at least 95 percent of maximum density following excavation activities.

With implementation of the recommendations, among others not specific to seismic design, the Geotechnical Investigation concluded that construction of the Project is feasible from a geotechnical standpoint. The Los Angeles Department of Building and Safety concurred with the findings and recommendations of the Geotechnical Investigation in a Soils Report Approval Letter dated January 13, 2016, and included in Appendix C-1 of this Initial Study.

Overall, given compliance with regulatory requirements and Site-specific recommendations, impacts associated with seismic ground shaking would be less than significant. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. This fluid-like state can result in horizontal and vertical movements of soils and building foundations from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion.

The CGS has delineated seismic hazard zones in areas where the potential for strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events are likely to occur. Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of a site are investigated and appropriate mitigation measures, if any, are incorporated into development plans. In addition, the City of Los Angeles General Plan Safety Element has designated areas susceptible to liquefaction. As shown on the November 6, 2014, Earthquake Zones of Seismic Investigation

for the Hollywood Quadrangle, the Project Site is not located within a mapped potential liquefaction hazard zone.¹¹ Further, no groundwater was encountered in the soil borings completed for the Geotechnical Investigation, which extended to a depth of 130 below ground surface. The highest groundwater level was established by the CGS Survey Seismic Hazard Zone Report of the Hollywood Quadrangle at 100 feet below the existing grade. While the Geotechnical Investigation found that the shallow fill material underlying the Project Site are unsuitable to support the proposed structures, excavation of the proposed subterranean levels would remove the fill materials and expose the underlying native soils, which are very dense to very stiff and not subject to liquefaction. As a result, the Geotechnical Investigation concluded that the potential for liquefaction at the Project Site is remote. Therefore, the impacts associated with liquefaction would be less than significant. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

iv. Landslides?

No Impact. The Project Site is not located within a City-designated Hillside Grading Area, is not subject to the City's Hillside Ordinance, and is not located in a City-designated Landslide area.^{12,13} Additionally, the Project Site is located in the downtown area and the Site and surrounding area is relatively flat. Further, the Project Site is not in close proximity to any mountains or steep slopes. As such, there is no potential for landslides to occur on or near the Project Site. Therefore, the Project would not expose people or structures to potential substantial adverse effects involving landslides and no impact would result. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

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

Less Than Significant Impact. During construction, the Project Site would be subject to ground-disturbing activities (e.g., removal of the existing temporary structures and surface parking lots, excavation, foundation construction, the installation of utilities). These activities would expose soils for a limited time, allowing for possible erosion.

Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during Project Site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion. In addition, on-site grading and site preparation must also comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. This municipal code section requires that all grading activities occur in accordance with grading permits issued by the Department of Building and Safety. The permits typically require that excavation and grading activities be scheduled during dry weather periods. Should grading activities occur during the rainy season (October 1st to April 14th), a Wet Weather Erosion Control Plan (WWECP) must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. The WWECP must include measures such as diversion dikes to

¹¹ California Geological Survey, *Earthquake Zones of Required Investigation: Hollywood Quadrangle*. November 6, 2014. Available at: <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm> Accessed June 2, 2015.

¹² City of Los Angeles Department of City Planning, *Parcel Profile Report: 1016-1036 South Figueroa Street*. Generated June 2, 2015.

¹³ City of Los Angeles General Plan Safety Element, *Exhibit C: Landslide Inventory & Hillside Areas*

channel runoff around the Project Site. Division 70 of the LAMC also requires that stockpiles, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. A deputy grading inspector is required be on-site during grading operations to ensure adhered to applicable regulations. Lastly, as Project construction would require greater than one acre of ground-disturbing activities, the Project applicant would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities, to control erosion and to protect the quality of surface water runoff during the Project's construction period.

Regarding soil erosion during Project operations, the potential is relatively low due to the fact that the Project Site would be improved with the proposed mixed-use development and/or landscaped. The use of hardscapes, vegetation, and groundcover would act as an effective barrier to soil erosion by impeding direct contact between precipitation/irrigation and the on-site soils.

Overall, with compliance to applicable regulatory requirements as discussed above, less than significant impacts would occur related to erosion or loss of topsoil during construction and operation of the Project. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

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?

Less Than Significant Impact. Fill material underlies the Site's existing improvements to a depth of three to eight feet below the ground surface. Native soils underlying the fill material are made up of recent-age alluvium consisting of silty sands to gravelly sands, with occasional layers of sandy and clayey silts, sediments deposited by river and stream action typical to this area of Los Angeles. Potential impacts with respect to liquefaction and landslide potential were determined to be less than significant based on the analysis presented in the response to Checklist Questions VI(a)(iii) and (iv).

With respect to lateral spreading, or collapse, Project construction and design would comply with the 2013 CBC, as enforced by the City of Los Angeles, which is designed to assure safe construction and includes building foundation requirements appropriate to the conditions present at the Project Site. Further, the Geotechnical Investigation concluded that no significant permanent slopes currently exist on the Project Site; therefore, slope stability is not considered an issue with respect to Project development. With regard to subsidence, the Geotechnical Investigation concluded that the underlying dense native soils could adequately support the towers on mat foundations and support the Podium structures on conventional spread footings without resulting in excessive differential settlement, provided that soils are compacted to at least 95 percent of maximum density following excavation activities. As discussed above, the Geotechnical Investigation recognized that while some differential settlement would be expected at all buildings during a seismic event, that the differential settlement between the podium column footings and the edges of the tower mat foundations would be minimal. A maximum settlement of 1.5–2.5 inches is expected below the tower's mat foundations and a ¾-inch below the column footings; maximum differential settlement is not expected to exceed ¾-inch for the mat foundation and ½-inch for the columns, which is well within acceptable limits. The Geotechnical Investigation concluded that construction of the Project is feasible from a geotechnical standpoint.

With regard to collapse, the subterranean retaining walls would be required to comply with the CBC, as incorporated into the City's Building Code, as well as the recommendations of the Geotechnical Investigation, including observing maximum earth pressures and adjacent surcharge, waterproofing and retaining wall drainage, utilizing proper backfill, and installing an adequate sump system. Temporary excavations during construction would cause disturbance of existing soils and contribute to potential localized raveling or caving of excavated areas (e.g. the excavated side walls losing stability). Such potential effects are typical of construction for projects with deep excavations. All required excavations would be sloped and properly shored in accordance with applicable provisions of the CBC as incorporated into the City's Building Code, and the site-specific recommendations contained in the Geotechnical Investigation. Specifically, the Geotechnical Investigation recommends that temporary excavations should be performed in accordance with Project plans, specifications, and all Occupational Safety and Health Administration (OSHA) requirements. Recommendations to shore up temporary excavations include the use of soldier piles and tie-back anchors, designed in accordance with adequate earth pressures and accounting for additional surcharge resulting from adjacent buildings and roadways. With compliance to standard City requirements and the recommendations of the Geotechnical Investigation, impacts associated with lateral spreading, subsidence, or collapse would be less than significant. No mitigation measures are required and no further analysis of this issue in an EIR is necessary.

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?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Geotechnical Investigation found that native soils underlying the Project Site are in the low to moderate expansion range, with an expansion index ranging from 20 and 73. However, the Project would be constructed and designed in accordance with the 2013 CBC, as enforced by the City of Los Angeles, which includes building foundation requirements appropriate to site-specific conditions. Further, the Geotechnical Investigation includes Site-specific recommendations to reduce the expansion potential of underlying soils, including the scarifying and re-compaction of native soils to a 95 percent relative compaction, and the placement properly controlled fill materials with an expansion index of less than 50. The Geotechnical Investigation also recommends that all continuous pour foundations to be reinforced with a minimum of #4 steel rebar and poured to a minimum of 12 inches in width and 24 inches in depth to strengthen the foundations against a number of forces, including soils expansion. When designed in accordance with design bearing pressures, recommendations of the Geotechnical Investigation would exceed a factor of safety of 3. Lastly, the Geotechnical Investigation recommends waterproofing and the drainage of subterranean water from retaining walls with a sump pump system, which would reduce the potential for cycles of wetting and drying. Therefore, with compliance to standard City requirements and the recommendations of the Geotechnical Investigation, impacts associated with expansive soils would be less than significant. No mitigation measures are required and no further analysis of this issue in an EIR is necessary.

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. The Project Site is located in an urbanized area where wastewater infrastructure is currently in place. The Project would connect to existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur. No further analysis of this topic in an EIR is necessary and no mitigation measures are 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?**

Potentially Significant Impact. Construction and operation of the Project would increase greenhouse gas (GHG) emissions 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. Therefore, it is recommended that this topic be further evaluated in an EIR and include a quantitative assessment of Project-generated GHG emissions resulting from construction equipment, vehicle trips, electricity and natural gas usage, and water conveyance, as well as relevant Project features that reduce GHG emissions.

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

Potentially Significant Impact. The Project would be required to comply with the City's Green Building Code pursuant to Chapter IX, Article 9, of the LAMC. In conformance with these requirements, the Project would be designed to reduce GHG emissions through various energy conservation measures. In addition, the Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in California Air Resources Board AB 32 Scoping Plan, which describes the approaches California will take to achieve the goal of reducing GHG emissions to 1990 levels by 2020. The Project would incorporate sustainable elements of design during construction and operation in an effort to meet the standards of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED®) Certified level. However, the amount of GHG emissions associated with the Project have not been estimated at this time. Therefore, further evaluation in an EIR is required to determine if the Project would achieve consistency with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions.

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?**

Potentially Significant Impact. To preliminarily assess the potential for hazardous materials to be of concern during Project construction and preparation, a technical investigation was conducted into the historical and existing on-Site use of hazardous materials. This investigation, entitled *Phase I Environmental Site Assessment: Luxe City Center Hotel, 1020 Figueroa St., Los Angeles, California* (Phase I ESA) and prepared by Terra-Petra in June 2015 (Appendix B-1 of this Initial Study), concluded that lead-based paints (LBPs) and asbestos-containing materials (ACMs) are likely present in the existing hotel building. An operational 1,500-gallon concrete, double-compartment diesel above-ground storage tank (AST) and associated piping for an emergency generator were found to be located in a storage room in the ground floor parking structure in the

on-site hotel building. Other small amounts of commercially available chemicals were identified in the ground-floor laundry room, 2nd floor kitchen, and several small storage/mechanical rooms.

In addition to operational facilities, the Phase I ESA identified five underground storage tanks (USTs) that have been previously removed from, or abandoned in place on, the Project Site. These include the 1993 removal of four USTs (i.e., two 10,000-gallon gasoline USTs, one 10,000-gallon diesel UST, and one 550-gallon waste oil UST) associated with a former gas station/auto repair service on the northwest corner of the Project Site and the 2003 abandonment in place of a 530-gallon diesel UST located beneath the hotel entrance driveway and landscape planter. Previous soil testing at the location of the five removed/abandoned USTs revealed the presence of residual soil contamination in the form of petroleum hydrocarbons, gasoline, and BTEX. The Project Site is under a Covenant and Agreement with the City for future removal of the 530-gallon UST. Moreover, a local subsurface plume of volatile organic compounds (VOCs) was identified at two off-site development projects in the vicinity and was concluded to have the potential to encroach the Project Site if the plume is very wide. Because the Project would remove the abandoned 530-gallon UST in accordance with the Covenant and Agreement, excavate soils in the vicinity of the four previously removed USTs to accommodate the subterranean parking levels, and construct habitable structures above a potential VOC plume, the Phase I ESA recommended further investigations into these conditions to determine whether they are of ongoing concern to the Project. Lastly, the Project Site was identified as being within a City-designated Methane Zone. In order to address these conditions, it is recommended that this issue be analyzed further in an EIR.

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. As discussed in Checklist Questions VII(a) immediately above, the Phase I ESA identified several potential hazardous materials concerns that could affect Project construction and/or operation, and further investigation is recommended. In order to address these conditions further, it is recommended that this issue be analyzed further in an 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?

Less Than Significant Impact. There are no existing or proposed schools located within one-quarter mile of the Project Site. The nearest schools to the Project Site are Olympic Primary Center (kindergarten), which is approximately 0.9 miles away; Tenth Street Elementary, which is approximately one mile away; John H. Liechty Middle School, which is approximately 1.6 miles away, and Santee Educational Complex, which is approximately 1.2 miles away. Los Angelitos Children's Center is located approximately 0.6 miles away. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Any emissions from the use of such materials would be minimal and localized to the Project Site. As mentioned above, Project excavation may require the removal of USTs and associated piping, or possibly small quantities of contaminated soils. However, this removal would occur in accordance with applicable regulations, would be localized to the Project Site, and existing schools are sufficient distance from the Project Site to preclude impacts if these materials are encountered during Project construction.

During operation of the Project, the limited quantities and prescribed handling procedures of any hazardous materials would not pose a risk to schools in the Project vicinity. The long-term occupation of the residential, hotel, and commercial uses within the Project, and maintenance of the proposed development would not require the use of hazardous or acutely hazardous materials or cause the generation or emission of hazardous substances, or generate hazardous waste. Therefore, the Project would result in less than significant impacts regarding hazardous materials at any schools within a one-quarter mile radius of the Project Site. No mitigation measures are required and no further analysis of this topic in an EIR is recommended.

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

Potentially Significant Impact. Government Code Section 65962.5, amended in 1992, requires CalEPA to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites (National Priorities List); State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Based on a review of the EnviroStor database, the Project Site is not identified on any of the above lists.¹⁴ In addition, the Project Site is not on the State Water Board's Geotracker Database, which provides a list of leaking underground storage tank sites that are included on the Cortese List.¹⁵ Lastly, the Project Site is not listed on CalEPA's list of sites with active Cease and Desist Orders or Cleanup and Abatement Orders or list of contaminated solid waste disposal sites.¹⁶

The Phase I ESA identified the Project Site as being listed on the CA FID UST List, SWEEPS UST, EMI, HAZNET, RGA LUST, HIST UST, EDR US Hist Auto Stat, LUST, and UST databases. The Phase I ESA indicates that the Project Site is listed on these databases as having generated asbestos-containing wastes or having USTs associated with the hotel and former on-site filling/service station. As the Project Site is listed on several databases and may require further listing associated with the concerns identified under Checklist Questions VII(a) and (b) above, it is recommended that this issue be analyzed further in an EIR.

¹⁴ Department of Toxic Substances Control, EnviroStor Database at <http://www.envirostor.dtsc.ca.gov/public>; accessed January 14, 2015.

¹⁵ State Water Resources Control Board, <https://geotracker.waterboards.ca.gov>; accessed January 14, 2015.

¹⁶ CalEPA's List of Active CDO and CAO sites; online at <http://www.calepa.ca.gov/SiteCleanup/CorteseList/>; accessed June 3, 2015.

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

(e, f) No Impact. The Project Site is not within an airport land use plan and it is not within two miles of a public use airport or private air strip. The two nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport, which are located approximately 13 and 14 miles southwest of the Project Site, respectively, and the subject of adopted land use plans. As a result, the Project would not result in a safety hazard to people residing or working within an airport land use plan or within two miles of an airport, and no impact would result. Further analysis of this topic in an EIR is not necessary and no mitigation measures are required.

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

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by the surrounding roadway network. Figueroa Street adjacent to the Project Site, as well as the nearby Harbor (US-110) and Santa Monica (I-10) Freeways are designated Selected Disaster Routes by the City.¹⁷ While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. In these instances, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with City requirements, the Project would develop a Construction Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

In addition, operation of the Project would generate traffic in the Project vicinity and would result in some modifications to access (i.e., new curb cuts for project driveways) from the streets that surround the Project Site. Nonetheless, the Project is required to provide adequate emergency access and to comply with LAFD access requirements. Subject to review and approval of site access and circulation plans by the LAFD, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the Project would not cause an impediment along the City's designated emergency evacuation route, nor would the proposed residential, hotel, and commercial uses impair the implementation of the City's emergency response plan, the Project would have a less than significant impact with respect to these issues. As such, no further evaluation of this topic in an EIR or mitigation measures are necessary.

¹⁷ *City of Los Angeles General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems.*

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?

No Impact. The Project Site is located in the highly urbanized downtown area of Los Angeles. No wildlands are present on the Project Site or surrounding area. Furthermore, the Project Site is not within a City-designated wildfire hazard area.¹⁸ Although the Project is not located in a City designated wildfire hazard area, the Project will be consistent with the City Fire Code, fire requirements, smoke/fire alarms, fully sprinklered indoor spaces, and irrigated landscaped areas. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant Impact. The Project Site is currently developed with the nine-story Luxe City Center Hotel and associated parking areas. The Project Site slopes gently to the south, with approximately four feet of elevation change across the Project Site. Stormwater runoff currently sheet flows from the Project Site to the surrounding streets and into the City's storm drain system. Construction of the Project would require earthwork activities, including grading and excavation of the Project Site, which would expose soils for a limited time and could allow for possible erosion, particularly during precipitation events. However, as discussed above, all grading activities would require grading permits from the City's Department of Building and Safety, which include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. Additionally, grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which includes requirements such as the preparation of an erosion control plan to reduce the effects of sedimentation and erosion. In addition, the Project applicant would be required to implement the provisions of the Project-specific SWPPP in accordance with the NPDES permit. The SWPPP is subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. As part of these regulatory requirements, BMPs must be implemented to control erosion and to protect the quality of surface water runoff during the construction by controlling potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides. Should grading activities occur during the rainy season (October 1st to April 14th), a WVECP must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. Compliance with the applicable regulatory requirements described above would ensure that construction-related water quality impacts are less than significant.

With regard to Project operation, the Project would be required to incorporate structural BMPs per the City's Standard Urban Stormwater Mitigation Plan (SUSMP) permit requirements and in accordance with the City's 2012 Low Impact Development (LID) Ordinance, which requires that all housing developments of 10 or

¹⁸ *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles; <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed January 14, 2015.*

more units and/or commercial developments with one acre or more of impervious surface area capture water runoff at its source through a set of design approaches and BMPs. Accordingly, BMPs to reduce the volume and intensity of stormwater runoff leaving the Project Site would be incorporated into the Project design in accordance with the City's Best Management Practices Handbook, Part B: Planning Activities. In accordance with these requirements, the Project would either infiltrate into the underlying soils, capture and re-use, and/or bio-filtrate and retain the Project Site non-storm and "first flush"¹⁹ stormwater runoff. In the event that a storm event produces runoff greater than LID (i.e., first flush) requirements, this overflow will continue to flow to the existing streets and into catch basins along Olympic Boulevard, S. Figueroa Street, and 11th Street. The S. Figueroa Street and 11th Street catch basins ultimately drain to a 21-inch reinforced concrete pipe (RCP) under Flower Street. The Olympic Boulevard catch basin ultimately drains to a 33-inch RCP under Olympic.²⁰ Both pipes eventually drain to a 54-inch storm drain located near the intersection of Venice Boulevard and the I-10 off-ramp, a tributary to Ballona Creek.²¹ Long-term BMPs for this Project could include, but are not limited to, ensuring that discharge from downspouts, roof drains, and scuppers would not be permitted on unprotected soils. Further, storm drain inlets and catch basins within the Project area would be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping. The final selection of BMPs would be completed through coordination with the City of Los Angeles. Through preparation and implementation of the SUSMP, operational water quality impacts would be minimized. Additionally, because the current on-site hotel and parking lots were developed prior to current LID requirements and do not currently operate under a SUSMP, the implementation of operational BMPs would improve the quality of stormwater runoff from the Project Site when compared to existing conditions. The Project's proposed BMPs would be submitted to the City for review as part of the Project's building permit approval process.

Through preparation of the SUSMP and implementation of the appropriate BMPs, Project operation would comply with the City's LID Ordinance and would not violate any water quality standards. Impacts would be less than significant. No mitigation measures are required and no further analysis of this topic in an EIR is necessary.

- 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 uses for which permits have been granted)?**

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including water supplied by the Metropolitan Water District's Colorado River and Feather River supplies (53%; Bay Delta 45%, Colorado River 8%), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (34%), local

¹⁹ *First-flush" flows are the first 0.75 inch of rain to fall in a 24-hour period.*

²⁰ *Los Angeles Department of Public Works, Bureau of Engineering. Navigate LA. Available at: <http://navigatela.lacity.org/navigatela/>. Accessed June 4, 2015.*

²¹ *Ibid.*

groundwater from the San Fernando groundwater basin (12%), and recycled water (1%).²² Based on the City's most current Urban Water Management Plan (UWMP), in 2009 to 2010, LADWP had an available water supply of roughly 550,000 acre-feet, with approximately 14 percent coming from local groundwater.²³ Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins. As the Project would replace one set of impervious surfaces (i.e., hotel and associated parking areas) with another (i.e., mixed-use towers and Podium structure), groundwater recharge on the Project Site would continue to be negligible and similar to the Project Site's historic contribution to recharge.

As reported in the Geotechnical Investigation, the historic high groundwater level at the Project Site is approximately 100 feet below ground surface. Groundwater was not encountered during recent soil borings on the Project Site, which extended to a depth of 130 feet below ground surface. Because excavation for building foundations is anticipated to be required to a depth of approximately 30 feet below ground surface, groundwater is not expected to be encountered during construction or operation, and dewatering would not be required. Therefore, the Project would not substantially deplete groundwater supplies or result in a substantial net deficit in the aquifer volume or lowering of the local groundwater table and impacts to groundwater would be less than significant. No mitigation measures are required and no further analysis of this topic in an EIR is necessary

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. During Project construction, temporary alteration of existing on-site drainage patterns may occur and rainfall occurring during the grading and excavation phases has the potential to carry exposed sediments into the local storm drain system. As discussed under Checklist Question VI(b), with the implementation of required BMPs, which include erosion and sediment control, or a WVECP, if construction occurs during the rainy season, and regular inspection of the construction site to ensure proper installation and maintenance of the BMPs, construction activities are not expected to result in substantial erosion or siltation on- or off-site. Runoff currently flows off the Project Site and into area streets, ultimately flowing into City storm drain system via catch basins on adjacent streets. Since all catch basins serving the Project Site ultimately flow to a 21-inch RCP under Flower Street, there would be no substantial alteration of on-site drainage pattern. There is no potential for downstream erosion since the street is paved and otherwise stabilized. As such, any alteration of existing drainage patterns would not result in substantial erosion or siltation on- or off-site and project impacts related to this topic would be less than significant.

As mentioned above, under existing conditions, most stormwater runoff flows off the Project Site and into the local storm drain system via catch basins on the adjacent streets. This condition would not change as a result of the Project. The Project Site is located in an urbanized area and is largely covered with impervious

²² Los Angeles Department of Water and Power: Facts and Figures. Available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=j77lkjtqw_4&_afLoop=357285129360562 Accessed December 21, 2015.

²³ Los Angeles Department of Water and Power, 2010 Urban Water Management Plan, Exhibit ES-R – Service Area Reliability Assessment for Average Weather Year, adopted May 3, 2011; https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=gixvgqhub_4&_afLoop=237918338210000, accessed April 2013.

surfaces. As a result, the Project, which would replace one set of impervious surfaces with another, would not be expected to materially increase the quantity of urban runoff from the Project Site. Rather, implementation of the detention/retention features discussed in Checklist Question IX(a) in accordance with the City's LID Ordinance and SUSMP would at a minimum, maintain the volume of first-flush flows during storm events when compared to existing conditions, which are not compliant with existing stormwater regulations. There is not any known potential of downstream erosion or flooding due to the fact that the street is paved and otherwise stabilized. Final plan check by the Los Angeles Bureau of Engineering (BOE) would ensure 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 serving the Project Site. As a result, Project development would not result in substantial erosion or siltation on- or off-site. Therefore, a less than significant impact would occur. No mitigation measures would be required and no further analysis of this topic in an EIR is necessary.

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. While the Project Site is under construction, the rate and amount of surface runoff generated at the Project Site would fluctuate. However, the construction period is short-term and compliance with applicable regulations discussed in Checklist Question IX(a) above would preclude fluctuations that result in flooding. With regard to operations, as discussed above, the Project would implement BMPs in accordance with the City's LID Ordinance and SUSMP to at a minimum, maintain the volume and water quality of first-flush stormwater flows from the Project Site. As a result, the Project would not be expected to adversely affect local drainage systems. Stormwater would continue to flow into the City's storm drain system via catch basins on the adjacent streets, all of which ultimately discharging to a 21-inch RCP along Flower Street. There is currently no known deficiency in the stormwater system serving the Project vicinity. Final plan check by BOE would ensure that adequate capacity is available in the storm drain system in this 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 serving the Project Site. Lastly, the Project Site is not located adjacent to any stream or river, and Project runoff would continue to drain into existing City storm drain infrastructure. There is not any known potential of downstream erosion or flooding since the storm drain system is completely channelized in subterranean pipes and not subject to course alterations. Therefore, the Project would not have the potential to result in flooding due to altered drainage patterns and impacts would be less than significant. No further analysis of this topic in an EIR is necessary and no mitigation measures are 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. The Project Site is almost entirely covered with impervious surfaces and stormwater runoff currently flows into the City's storm drain system. There are no known deficiencies in the local stormwater system. As discussed above, the Project would implement BMPs to capture and treat first flush stormwater flows in accordance with the City's LID Ordinance and SUSMP, which would at a minimum, maintain the volume of first flush stormwater flows and pollutants as under existing conditions. Final plan check by BOE would ensure 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 serving the Project Site. Therefore, a less than

significant impact would result. No further analysis of this topic in an EIR is necessary and additional mitigation measures are not required. Refer to Checklist Question VIII(a) for a discussion of Project impacts related to water quality.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed above in Checklist Question IX(a), construction and operational BMPs implemented as part of the Project's SWPPP, the City's LID Ordinance and SUSMP, and good housekeeping practices would preclude sediment and hazardous substances from entering stormwater flows. Therefore, a less than significant impact would result and no mitigation measures are required. Further analysis of this topic in an EIR is not necessary.

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

No Impact (g-h). The Project Site is not located within a flood zone, including the 100-year flood zone designated by the Federal Emergency Management Agency (FEMA).^{24,25} Thus, no flood zone impacts would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is necessary.

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. As discussed above, the Project Site is not located within a designated floodplain. Further, the Project Site is not located with a potential inundation area, being located west of the inundation area for the Los Angeles River.²⁶ Additionally, there are no levees or dams in the Project vicinity. Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, would occur. No mitigation measures are required and no further analysis of this issue in an EIR is necessary.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity.

With respect to tsunami hazards, the Project Site is located approximately 13 miles inland (east) from the Pacific Ocean, and therefore would not be subject to a tsunami. Furthermore, the Project Site is not located

²⁴ City of Los Angeles Department of City Planning, *Parcel Profile Report: 1016-1036 South Figueroa Street*. Generated September 28, 2015.

²⁵ Federal Emergency Management Agency, *Flood Insurance Rate Map Number 06037C1620F, Effective Date September 26, 2008*.

²⁶ City of Los Angeles General Plan, *Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994*.

on a City-designated tsunami hazard area.²⁷ The Project Site is also located in an area of relatively flat topography and urban development, with no enclosed bodies of water nearby, and as such, there is no potential for inundation resulting from a seiche and negligible potential for mudflows. Therefore, no impacts would occur due to inundation by tsunami or mudflow. No further analysis of this topic is necessary and no mitigation measures are required.

X. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located within the boundaries of the Central City Community Plan, in the highly urbanized downtown area of Los Angeles, and is improved with the nine-story Luxe City Center Hotel and associated parking areas. The Project vicinity is generally built out with a variety of entertainment, residential, and commercial uses, as well as surface parking areas. Development is generally dense, with mid- to high-rise structures typifying nearby development. The Project would be infill development and would introduce new residential, hotel, and commercial uses to the Project Site, in conformance with proposed Project entitlements, and similar to adjacent and nearby land uses. While the Project would result in minor changes to the way vehicles access the Project Site, traffic in the surrounding community would continue to utilize the same circulation facilities and patterns as occur presently. Further, the ground floor of the Project would include a 5,000-square-foot open space public Plaza along S. Figueroa Street that would support connectivity between the Project Site and LA LIVE while also encouraging a pedestrian friendly streetscape. Behind and adjacent to the outdoor plaza would be commercial uses that would help activate the street edge and promote pedestrian activity.

With regard to land use relationships, the Project would provide a mix of residential, hotel, and commercial uses. As such, the Project would be an infill Project providing uses in keeping with the mixed-use character of the surrounding area. Given the mix of uses in the Project vicinity, and the infill character of the Project, the Project would not introduce land uses that are inconsistent with development in the local area or effect existing land use relationships. Therefore, the Project would not physically divide an established community and a less than significant impact would result. No further analysis of this topic in an EIR is necessary and no mitigation measures are 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Project Site is located within the Central City Community Plan Area, the City Center Redevelopment Project Area, and a State Enterprise Zone. Although not located in the LASED, the Project is bordered to the west and south by the LASED. Under the Central City Community Plan, the majority of the property is designated as Regional Center on the western lots and High Density Residential on the southeastern lots. The Project Site is zoned C2-4D-O on the western lots which permits hotel,

²⁷ *City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.*

residential and commercial uses. The southeastern lots are zoned [Q] R5-4D-O which permits high density residential development. The D condition limits the maximum floor area ratio (FAR) to 6:1, with an increase to a maximum FAR of 13:1 with a Transfer of Floor Area Rights (TFAR).

The Applicant is requesting several entitlements/approvals, including a Development Agreement with the City of Los Angeles to construct a mixed-use project containing three high-rise towers and a Podium structure containing residential, hotel, and commercial uses. A TFAR is being requested from the Los Angeles Convention Center (Donor Site) to the Project Site, allowing an FAR of 9.7:1 and 1,129,284 square feet in lieu of a 6:1 FAR. The Applicant is seeking a Determination under the City Center Redevelopment Plan to allow a residential use in a commercial zone or a commercial use in a residential zone. A Vesting Tentative Tract Map is also being requested. Lastly, a Site Plan Review will be required because the Project proposes greater than 50 residential units and greater than 50,000 sf of non-residential floor area, and a Master Conditional Use Permit will be required for the sale and service of alcohol and live entertainment. Evaluation of the effects of the Project's requested entitlements/approvals, and evaluation of Project compliance with other applicable plans, policies, and regulations, is recommended in an EIR.

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

No Impact. As discussed in Checklist Question IV, Biological Resources, the Project Site is located in the highly urbanized downtown area of Los Angeles and is developed with the Luxe City Center Hotel and associated parking areas. The Project Site contains minimal ornamental landscaping. The Project Site is not located within a habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with the provisions of any adopted applicable conservation plan. No further analysis of this topic in an EIR is necessary and no mitigation measures are 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?**
- 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-b). The Project Site is not classified by the City of Los Angeles as containing significant mineral deposits.²⁸ Furthermore, the Project Site is not designated as an existing mineral resource extraction area by the State of California or the U.S. Geological Survey.²⁹ Additionally, the Project Site is designated for Regional Center Commercial and High Density Residential uses within the City of Los Angeles General Plan Framework and is not designated for mineral extraction land use. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of

²⁸ *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure GS-1 – Areas Containing Significant Mineral Deposits in the City of Los Angeles.*

²⁹ *California Geological Survey/U.S. Geological Survey, 2008 Minerals Yearbook, California, July 2012; <http://minerals.usgs.gov/minerals/pubs/state/2008/myb2-2008-ca.pdf>. Accessed January 13, 2015.*

a locally important mineral resource recovery site. No impacts to mineral resources would occur. Further analysis of mineral resources is not necessary in and EIR and no mitigation measures are required.

XII. NOISE

Would the project result in:

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

Potentially Significant Impact. Construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. Additionally, operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of heating, ventilation, and air conditioning (HVAC) systems, vehicles in the parking garage, loading and unloading of trucks, and outdoor dining, bar, pool, and recreation areas on the Podium rooftop, pool and recreation areas on the top of the residential and hotel towers, and resident and visitor activities on the Project Site. As such, nearby residential or other sensitive uses could potentially be affected. Therefore, it is recommended that the Project's potential to exceed noise standards be analyzed further in an EIR.

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

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and noise due to Project Site grading, clearing activities, and haul truck travel. In addition, Project construction may require pile driving. As such, the Project would have the potential to generate or expose people to excessive groundborne vibration and noise levels during short-term construction activities. In addition to the potential to expose people to potential groundborne vibration, there is the potential for the Project to generate construction-related vibration that may impact adjacent historical resources. Therefore, vibration monitoring and other actions may be warranted to reduce any potential vibration effects. It is recommended that this topic be analyzed further in an EIR.

Operation of the Project would not generate groundborne vibration or noise at levels beyond those which currently exist resulting from the existing urbanized development setting. As such, operation of the Project would not have the potential to expose people to excessive groundborne vibration or noise, resulting in a less than significant impact. Therefore, no further analysis of operational groundborne vibration or noise is necessary in an EIR and no mitigation measures would be necessary.

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

Potentially Significant Impact. As discussed in Checklist Question XII(a), operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of HVAC systems, loading and unloading of trucks, vehicles in the parking garage, outdoor dining, bar, pool, and recreation areas on the Podium garden terrace, bar, pool, and recreation areas on the rooftop of the Hotel Tower and pool and amenities on top of the Residential Tower 1 and Residential Tower 2, and resident and visitor activities on the Project Site. Therefore, it is recommended that potential impacts associated with a permanent increase in ambient noise levels be analyzed further in an 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. As discussed in Checklist Question XII(a), construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. In addition, Project construction may require pile driving. Therefore, it is recommended that potential impacts associated with a temporary or periodic increase in ambient noise levels be further analyzed in an 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?

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?

(e-f) No Impact. As discussed in Checklist Question VIII(e and f) above, the Project Site is not located within an airport land use plan or within two miles of an airport. The two nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport, which are located approximately 13 and 14 miles southwest of the Project Site, respectively. Therefore, the Project would not expose its future residents or residents within the Project vicinity to excessive noise levels from airport use. No further analysis of this topic in an EIR is necessary and no mitigation measures are 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. The Project is located within the jurisdiction of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), the Regional Transportation Plan (RTP), and Regional Housing Needs Assessment (RHNA), in coordination with other State and local agencies. These documents provide guidelines for growth at the regional level, and include population, employment, and housing projections for the region and its subdivisions. In April 2012, SCAG's Regional Council adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP). The 2012 RTP presents the transportation vision for the region through the year 2035 and provides a long-term investment framework for addressing the region's transportation and related challenges. It also includes projections of population, households, and employment through 2035. Furthermore, the City's General Plan including its community plans address growth in the region.

The proposed Project would include housing units accommodating additional population and would also create new employment opportunities. Specifically, the Project would provide up to 650 new dwelling units, up to 300 hotel rooms and hotel ancillary facilities, and approximately 80,000 square feet of new commercial

uses (i.e., retail, restaurant) that would provide new housing and employment opportunities. Therefore, the Project's growth contributions should be reviewed for consistency with the SCAG projections; and consistency with regional growth policies. The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the infill Project would utilize the existing transportation and utility infrastructure to serve the Project. However, the Project would introduce new residential units and employment opportunities to the Project Site. Further analysis of this topic in an EIR is recommended to assess the consistency of the Project's direct and indirect population growth with available population projections.

- 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?**

No Impact (b-c). No dwelling units are currently located on the Project Site. The Project Site is currently developed with the Luxe Hotel on the northwest portion of the Project Site with the remainder of the Project Site developed with surface parking. Thus, the Project would not result in the demolition of existing housing units. Since no existing housing would be displaced, there would be no necessity for the construction of replacement housing elsewhere. Additionally, the Project would provide 650 new residential units to the Project Site. As no impacts would occur in these regards. Further analysis of this topic in an EIR is not necessary and no mitigation measures are 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. The LAFD provides fire protection and emergency medical services in the City of Los Angeles. LAFD Fire Stations within proximity to the Project include LAFD Fire Station #10 at 1335 South Olive Street (0.5 miles); LAFD Fire Station #9 at 430 East 7th Street (1.0 mile); LAFD Fire Station #3 at 108 North Fremont Avenue (1.2 miles); LAFD Fire Station #11 at 1819 West 7th Street (1.0 mile); LAFD Fire Station #13 at 2401 West Pico Boulevard (1.5 miles); and LAFD Fire Station #4 at 450 East Temple Street (1.7 miles).

Because the Project would increase the developed floor area and height of buildings on the Project Site, and introduce an increased number of residents, guests, and employees to the Project Site, it could result in a greater demand on LAFD fire protection and emergency medical services would be generated, and there is potential for impacts on emergency response times. Further evaluation is needed to determine the Project's potential to impact LAFD fire protection and emergency medical services and emergency response times in the Project area.

During Project construction, temporary lane closures on the curb lanes of the roadways adjacent to the Project Site may be required for activities such as excavation, foundation pouring, new utility connections, street work, and in special, limited circumstances, for offloading and mobile crane placement. Further evaluation is needed to determine the potential for, and significance of, any impacts temporary lane closures could have on emergency response times.

Therefore, it is recommended that potential impacts associated with fire protection and emergency medical services be analyzed further in an EIR.

b. Police protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services in the City of Los Angeles. The nearest LAPD Station is the LAPD Central Community Police Station located at 251 E. 6th Street which is located approximately one mile from the Project Site.

Since the Project would increase the developed floor area on the Project Site and introduce an increased number of residents, guests, and employees to the Project Site, it could result in a greater demand on LAPD police protection services would be generated and there is potential for impacts on emergency response times. Further evaluation is needed to determine the Project's potential to have an impact on LAPD police protection services or police response times in the Project area.

During construction, temporary lane closures on the curb lanes of the roadways adjacent to the Project Site may be required. Further evaluation is needed to determine the potential for impacts on police response times in the event temporary lane closures occur.

Therefore, it is recommended that potential impacts associated with police protection services be analyzed further in an EIR.

c. Schools?

Less Than Significant Impact. The Project Site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD), and specifically within LAUSD Local District 2. The Project Site is within the attendance boundaries of 10th Street Elementary School, John H Liechty Middle School, and within the LAUSD Belmont Zone of Choice with multiple high school options, including Belmont High School, the Contreras Learning Center, the Ramon C Cortines School of Visual & Performing Arts, and the Edward R Roybal Learning Center. These schools are currently operating on a single-track calendar, whereby instruction generally begins in mid-August and continues through early June.

LAUSD has established student generation rates for a variety of uses including residential development (multi-family) as well as other employment generating uses, e.g. retail, hotel, and commercial uses. An estimate of the number of students that could be generated by the Project's residential, hotel, and commercial uses is provided in **Table B-1, Estimated Number of Students to be Generated by the Project**. As stated in Table B-1, the Project is estimated to generate 110 elementary school students, 31 middle school students, and 63 high school students for a total of 204 students.

Table B-1

Estimated Number of Students to be Generated by the Project

Land Use	Size	Units	Elementary School	Middle School	High School	Total^d
Residential ^a	650	units	107	29	61	197
Hotel (300 rms) ^b	255,672	sq.ft.	2	1	1	4
Commercial	80,000	sq.ft.	1	1	1	3
Total			110	31	63	204

^a Student Generation Rates for Residential Uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Based on the rate for Multi-family residential uses: Elementary = 0.1649; Middle School = 0.045; High School = 0.0943.

^b Student Generation for Hotel uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010 -- the most recent data available for non-residential uses. For each 1,000 sf of Hotel floor area: Elementary = 0.0083; Middle = 0.0041; 0.0075.

^c Student Generation rates for Commercial, Retail, and Banquet uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010 -- the most recent data available for non-residential uses. For each 1,000 sf of Commercial, Retail, and Banquet floor area: Elementary = 0.0165; Middle School = 0.0080; High School = 0.0100.

^c Total number of students has been rounded up, in order to provide whole student number counts.

Source: PCR Services Corporation, September 2015.

Because of the anticipated demographic characteristics of the future residents of the Project, the Project’s student generation is likely to be less than estimated in the above analysis, which is based on LAUSD generation factors. For instance, the Project’s large number of studio and one-bedroom units would generate few, if any, students.³⁰ This estimate is also conservative in that it assumes that future Project residents with families would be new to the area and would not already have students attending the affected schools. Furthermore, it is likely that a portion of the Project’s school-aged children would attend private schools, thus reducing attendance at LAUSD schools.

To the extent that on-site development increases demand at LAUSD schools serving the Project Site, State law, including Government Code Section 65995 and Education Code Section 17620, requires the payment of fees at a specified rate for the funding of improvements and expansion to school facilities. Such fees are paid at the issuance of building permits. In accordance with Senate Bill 50 (SB 50), enacted in 1998, the payment of this fee is deemed to provide full and complete mitigation for impacts to school facilities. The payment of these fees is required pursuant to standard City Regulatory Compliance Measures which would require the Project to pay all applicable school facility development fees in accordance with Government Code Section 65995. With implementation of the Regulatory Compliance Measure below, impacts on schools would be reduced to a less than significant level. No further analysis of this topic in an EIR is required.

d. Parks?

Potentially Significant Impact. Because the Project would introduce new residents to the Project Site and new employees that might visit nearby parks, greater demand on existing public recreational and park

³⁰ Of the Project’s new 650 residential units, 421 units are either studio or one-bedroom units.

facilities and services would be generated. The Project would provide 48,800 square feet of on-site open space including an open space public plaza, a Podium garden terrace, rooftop/penthouse area, as well as recreational facilities for Project residents, guests, and hotel patrons. The public plaza would incorporate special landscape features, seating, and the potential for public art displays. Recreational features for residents, guests, and hotel patrons would include rooftop Podium garden terraces serving each of the three towers and providing a number of amenities. The rooftop Podium gardens terraces would feature open areas for adult and children recreational activities, pools, bar, and outdoor dining areas, strolling/exercise areas for pets, and quiet/passive areas with shaded zones. At the top level of the residential towers would be a rooftop amenity deck a portion of which is available to the individual penthouse units only. At the top/penthouse level of the Hotel Tower would be a rooftop amenity deck which would include a pool, bar, lounge, and greenspace areas. The Podium garden terraces and rooftop amenity decks would be finished with concrete pavers, turf, and landscaping. Additional private open space for project residents would be provided through 27,000 square feet of balconies for a total of 75,800 square feet of open space. These facilities would reduce the Project's demand for use of existing public recreational and park facilities. Nevertheless, it is recommended that potential residual impacts on park services in the Project area be analyzed further in an EIR.

e. Other public facilities?

Potentially Significant Impact. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. The nearest library to the Project Site is the LAPL Central Library located at 630 W. 5th Street (0.6 miles). Other nearby libraries include the LAPL Little Tokyo Branch Library located at 203 S. Los Angeles Street (1.2 miles) and the LAPL Pico Union Branch Library located at 1030 S. Alvarado Street (1.1 miles). Because the Project would introduce new residents to the Project Site, greater demand on LAPL library services would be generated. Therefore, it is recommended that potential impacts associated with library services be analyzed further in an EIR.

During construction and operation of the project, other governmental services, including roads, would continue to be utilized. Project residents, patrons, visitors, and employees would use the existing road network, without the need for new roadways to serve the Project Site. As discussed below in Section XVI, Transportation/Circulation, the Project could result in an increase in the number of vehicle trips attributable to the Project Site. However, the additional use of roadways would not be excessive and would not necessitate the upkeep of such facilities beyond normal requirements. Therefore, the Project would result in less than significant impacts on other governmental services. Further analysis of other governmental services (excluding libraries) is not necessary and no mitigation measures would be required.

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?

Potentially Significant Impact. As discussed in Checklist Question XIV(d), above, because the Project would introduce new population to the Project Site, greater demand on existing public recreational and park facilities and services could be generated. Therefore, it is recommended that this issue be analyzed further in an EIR.

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

Potentially Significant Impact. The Project would provide both publically accessible and private open space and recreational amenities such as pools, gyms, spas, and community rooms. However, as indicated in the response to Checklist Question XV(a) above, the Project would introduce new population to the Project Site, which could generate a greater demand on existing public recreational and park facilities and services. Therefore, it is recommended that this issue be analyzed further in an EIR.

XVI. TRANSPORTATION/TRAFFIC

Would the project:

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

Potentially Significant Impact. The Project proposes to construct a mixed-use development consisting of 650 units up to 300 hotel rooms, and 96,000 square feet of commercial, retail, restaurant, and banquet space. These uses would add traffic to local and regional transportation systems. As such, operation of the Project could adversely affect the existing capacity of the street system or exceed an established standard. Construction of the Project would also result in a temporary increase in traffic due to construction-related truck trips and worker vehicle trips. Therefore, traffic impacts during construction could also adversely affect the street system. As the Project's increase in traffic would have the potential to result in a significant traffic impact, it is recommended that this topic, including parking provisions, be analyzed further in an 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. The congestion management program (CMP) is a State-mandated program enacted by the State legislature to address the impacts that urban congestion has on local communities and the region as a whole. Metro is the local agency responsible for implementing the requirements of the CMP. New projects located in the City of Los Angeles must comply with the requirements set forth in the Metro's CMP. The Project would generate vehicle trips which could potentially add trips to a freeway segment or CMP intersection. As such, it is recommended that this topic be analyzed further in an 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. As discussed in Checklist Question VIII(e) above, the two nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport, which are located approximately 13 and 14 miles southwest of the Project Site, respectively. The Project is within the cluster of high-rise towers that comprise the downtown area of Los Angeles. As such, the Project is not anticipated to alter air traffic patterns or affect the utilization of navigable air space. Further, to ensure the safety of

residents and guests from localized aircraft (e.g., helicopters), the Project would be subject to the Federal Aviation Administration's (FAA) Federal Aviation Regulations Part 77, Objects Affecting Navigable Airspace. These regulations ensure air safety by regulating construction or alteration of buildings or structures that may affect navigable airspace, and apply to buildings with a height of over 200 feet above ground level. The Project would result in the development of three towers on the site that would be 450, 490, and 540 feet above grade. In accordance with FAA regulations, and similar to other downtown high-rise buildings, the Project would be required to notify the FAA of the building's location and height, and install flashing beacons and/or steady burning lights to demarcate the building's location to aircraft. As such, the Project would not result in a change in air traffic patterns including, increases in traffic levels or changes in location that would result in substantial safety risks. As a less than significant impact would occur, further analysis of this topic is not necessary, and no mitigation measures are required.

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

Potentially Significant Impact. The Project would not alter existing street patterns in the vicinity, and there are no existing hazardous design features such as sharp curves or dangerous intersections on-site or within the Project vicinity. However, Project construction may require temporary lane or sidewalk closures, and the Project would alter the way vehicles ingress and egress the Project Site, and would result in increased trip generation and driveway use compared to existing on-site uses. Further, pedestrian activity tends to be high in the Project vicinity during events at the Los Angeles Convention Center, Staples Center, and LA LIVE. While the Project does not include any hazardous design features such as sharp curves or dangerous intersections, or propose any hazardous or incompatible uses, it is recommended that this topic be analyzed further in an EIR.

e. Result in inadequate emergency access?

Potentially Significant Impact. Immediate vehicular access to the Project Site is provided via S. Figueroa Street, 11th Street, and Flower Street, which border the Project Site. While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect emergency access on segments of adjacent streets during certain periods of the day. In addition, the Project would alter the way vehicles ingress and egress the Project Site, and generate traffic in the Project vicinity and would result in some modifications to access from the streets that surround the Project Site. Thus, it is recommended that this topic be analyzed further in an EIR.

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. The Project Site is well served by public transportation and is anticipated to improve the pedestrian experience through the provision of ground floor development and open space and plaza areas that would support connectivity between the Project and LA LIVE while also encouraging a pedestrian friendly and vibrant streetscape. Further, the Project is not expected to interfere with or degrade the performance or safety of public transit, bicycle, or pedestrian facilities. The Project would alter access to the Project site from existing conditions and would introduce new residential units and employment opportunities to the Project Site, contributing to an increase in population to the surrounding area. Nonetheless, due to the Project's potential to temporarily impact transportation networks in the immediate vicinity during construction and increase ridership on public transit facilities, it is recommended that the

Project's potential for impacts during construction and its consistency with policies, plans, and programs supporting alternative transportation, as well as increased pedestrian activity during events at the Los Angeles Convention Center, Staples Center, and/or LA LIVE, be analyzed further in an EIR.

XVII. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Potentially Significant Impact. The City of Los Angeles Department of Public Works (LADPW) provides wastewater services for the Project Site. Any wastewater that would be generated by the Project would be treated at the Hyperion Treatment Plant (HTP). The HTP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). The HTP is designed to treat 450 million gallons per day (mgd) HTP has an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of capacity available.^{31,32} The discharge of effluent from the HTP into Santa Monica Bay is regulated by the HTP's NPDES Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board (RWQCB)'s requirements for a recreational beneficial use. The Project would result in new sources of wastewater generated at the Project Site with the development of the new residential, hotel, and commercial uses along with related amenity facilities and open space. The incremental quantity of wastewater generated by the Project could potentially result in impacts with respect to wastewater treatment. Therefore, it is recommended that this issue be analyzed further in an 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. The proposed Project would result in new sources of wastewater generated at the Project Site with the development of the new residential, hotel, and commercial uses, along with related amenity facilities and open space. The incremental quantity of wastewater generated by the Project could potentially result in impacts with respect to wastewater treatment. Therefore, it is recommended that this issue be analyzed further in an EIR.

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

Less Than Significant Impact. As discussed in Checklist Question IX(e) above, the existing on-site improvements were constructed prior to the City's LID requirements, which require the Project to treat and

³¹ *The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd. (Information regarding peak flow is included in the IRP, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.)*

³² *City of Los Angeles Bureau of Sanitation, Wastewater: Facts & Figures. Available at: <http://www.lacitysan.org/wastewater/factsfigures.htm>. Accessed September 22, 2015.*

infiltrate the first-flush runoff from the Project Site. As a result, with implementation of the Project's BMP's in accordance with the City's LID Ordinance and SUSMP, first-flush stormwater flows from the Project Site would be reduced when compared to existing conditions and the Project would not be expected to adversely affect local drainage systems. As discussed above, the Project would continue to flow into catch basins along Olympic Boulevard, S. Figueroa Street, and 11th Street, ultimately discharging to the RCP storm drains along Flower Street and Olympic Boulevard. There is currently no known deficiency in the stormwater system serving the Project vicinity. Final plan check by the BOE would ensure 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 to serve the Project Site, as well as any extensions to the existing system in the area. Therefore, a less than significant impact would result. No additional mitigation measures are required and no further analysis of this topic in an EIR is necessary.

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

Potentially Significant Impact. Given the increased development that would occur on the Project Site, the Project would generate an increase in water demand beyond existing conditions. Changes to water availability and water regulations, as well as potential conservation of water resources are important considerations in the ability of Project to support its on-site population, guests, and visitors. Further, Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500-dwelling unit subdivision. As the Project would meet the established thresholds, a WSA is required. Therefore, it is recommended that this issue be analyzed further in an 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. According to NavigateLA, there is an existing City of Los Angeles 20-inch vitrified clay pipe (VCP) main line along Flower Street and 10-inch VCP main line along Figueroa Street that could serve the Project. Given the increased development that would occur on the Project Site, the proposed Project would result in an increase in wastewater generation beyond existing conditions. Therefore, it is recommended that this issue be analyzed further in an EIR.

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

Less Than Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The Los Angeles Bureau of Sanitation (BOS) is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential,

commercial, and industrial properties. The City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at in-County landfills.

In December 2015, the County of Los Angeles Department of Public Works released the 2014 Los Angeles County Integrated Waste Management Plan (CoIWMP) (the most recent available).³³ As indicated therein, the remaining disposal capacity for the County's Class III landfills is estimated at approximately 112 million tons as of December 31, 2014. In addition to in-County landfills, out-of-County disposal facilities are also available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the CoIWMP, the County anticipates that future Class III disposal needs can be adequately met through 2029 through some combination of the following strategies (Scenarios II through VII of the 2014 Annual Report): supporting and increasing exportation of waste to out-of-County facilities, meeting CalRecycle's Statewide disposal target of 2.7 pounds per day, create additional alternative technology capacity, and utilizing waste-by-Rail capacity to export to Out-of-County landfills.

Construction Impacts

Project construction would require earthwork (grading and excavation) and the new construction of a mixed-use building on the Project Site. Each of these activities would generate demolition waste including but not limited to soil, asphalt, wood, paper, glass, plastic, and metals. As shown in **Table B-2, Project Construction Debris**, construction of the proposed Project would generate an estimated 8,870 tons of debris. As discussed in Attachment A, Project Description, of this Initial Study, excavation of the Project Site would generate an estimated 188,500 cubic yards of soil export.

Construction materials are disposed of at one of the unclassified inert landfills available to the City of Los Angeles, typically the Azusa Land Reclamation Facility, which has an estimated remaining capacity of approximately 59.83 million tons or 49.86 million cubic yards.³⁴ As a result, Project excavation and construction would account for only a small percentage (0.01 percent) of the Azusa Land Reclamation Facility, and construction waste would not exceed the existing capacity of this facility. In addition, the estimate of construction and demolition debris is conservative in that it does not take into account recycling efforts that would occur in accordance with City regulations. These regulations require the applicant to contract with a waste disposal company that recycles construction and/or demolition debris, as well as to provide temporary waste separation bins during project construction. On March 5, 2010, the City Council approved the Construction and Demolition Waste Recycling Ordinance, which requires all mixed construction and demolition was generated within City limits be taken to City-certified construction and demolition waste processors. This recycling policy is effective January 1, 2011. Data is not yet available on the effectiveness of this ordinance.³⁵ However, assuming Project construction achieves a minimum 50

³³ County of Los Angeles Department of Public Works, *Countywide Integrated Waste Management Plan: 2014 Annual Report*. May 2015. Available at: <http://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=3473&hp=yes&type=PDF>. Accessed December 21, 2015.

³⁴ County of Los Angeles Department of Public Works, *Countywide Integrated Waste Management Plan: 2014 Annual Report*. May 2015. Pg. 32.

³⁵ City of Los Angeles, Department of Public Works, *Solid Resources, Recycling Statistics*. Available at: http://www.lacitysan.org/solid_resources/recycling/c&d.htm. Accessed September 28, 2015.

Table B-2

Project Construction Debris

Land Use	Size	Generation Rate	Total Solid Waste Generation (lbs)	Total Solid Waste Generation (tons)
Demolition				
Hotel	112,748 sf	92 lbs per sf ^a	10,372,816 lbs	5,186 tons
Surface Parking Area	81,350 sf	2,400 lbs per cy ^b	2,410,366 lbs	1,205 tons
Construction				
Mixed-Use Development	1,129,284 sf	4.39 lbs per sf ^c	4,957,557 lbs	2,479 tons
Total Solid Waste Generated During Project Construction			17,740,739 lbs	8,870 tons
Total Solid Waste With Diversion Efforts (50 percent)			8,870,369 lbs	4,435 tons
Soil Export (cubic yards)				188,500 cy^d

^a CalEEMod User's Guide, Appendix A, p. 12, July 2013.

^b Assumes asphalt paving is 4 inches deep. 81,350 sf of asphalt area at 4 inches of depth = 1,004.32 cy

^c Generation factor obtained from U.S. EPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003, Page 8

^d Gensler, August 2015

Source: PCR Services Corporation, September 2015.

percent diversion rate as required by Assembly Bill 939³⁶, construction debris would be reduced to a total of approximately 4,435 tons. This constitutes a fraction (less than 0.01 percent) of the remaining capacity of the Azusa Land Reclamation Facility. Because construction waste would not exceed the capacity of existing disposal facilities and would be further reduced by recycling, impacts would be less than significant. No mitigation measures are required and no further analysis of this topic in an EIR is necessary.

Operational Impacts

Estimated operational solid waste generation for the Project is shown in **Table B-3, Estimated Operational Solid Waste Generation**. It is estimated that the total waste generation for the Project would be approximately 1,613 tons per year, or 4.42 tons per day. The daily amount of solid waste generated by the Project would represent a negligible amount (0.05 percent) of the daily solid waste disposed of by the City (9,881 tons). It is important to note that this estimate is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on successful City implementation of AB 939 and the City's objective to achieve a 70 percent diversion goal by 2020 and eventually to a zero waste scenario by 2025 as envisioned in the Los Angeles Solid Waste Integrated Resources Plan.³⁷ Recycling efforts in the City of Los Angeles in accordance with AB 939 achieved a solid waste diversion rate of 76.4 percent in

³⁶ Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (Assembly Bill 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 requires each city or county plan to include an implementation schedule which shows diversion of 50 percent of all solid waste by January 1, 2000.

³⁷ City of Los Angeles, Department of Public Works, Solid Resources, Zero Waste Progress Report, pg. 7. Available at: http://www.lacitysan.org/solid_resources/recycling/publications/PDFs/CLA_%20Zero_Waste_Progress_Report.pdf. Accessed September 28, 2015.

Table B-3

Estimated Operational Solid Waste Generation

Land Use	Size	Generation Rate (lbs/unit/day) ^a	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Residential	650 units	12.23 lbs/unit/day	7,950 lbs	1,451 tons
Hotel	300 rooms	4 lbs/room/day	1,200 lbs	219 tons
Restaurant	40,000 sf	5 lbs/1,000 sq. ft./day	200 lbs	37 tons
Commercial/Retail	40,000 sf	5 lbs/1,000 sq. ft./day	200 lbs	37 tons
Hotel (demo)	(180)	4 lbs/room/day	(720) lbs	(131) tons
Total			8,830 lbs	1,613 tons

^a Generation factors provided by the CalRecycle website: *Estimated Solid Waste Generation Rates*. <http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm>. Accessed September 28, 2015.

Source: PCR Services Corporation, January 2016

2011, the most recent year data is available.³⁸ Assuming the Project achieves a similar diversion rate, the amount of Project solid waste that would need to be landfilled would be reduced to an estimated 381 tons annually, or 1.04 tons per day, which constitutes a negligible portion (less than 0.01 percent) of the daily permitted intake (29,640 tons) and remaining capacity (112 million tons) of in-County landfills and waste-to-energy facilities serving the City.

As described in the CoIWMP 2014 Annual Report, future disposal needs for the 15-year planning horizon (2029) would be adequately met through the use of in-County and out-of-County facilities. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time for the County to address any future shortfalls in landfill capacity.

Based on the above, Project-generated waste would not exacerbate the estimated landfill capacity requirements addressed for the 15-year planning period ending in 2029, or alter the ability of the County to address landfill needs via existing capacity and other options for increasing capacity. Therefore, impacts on solid waste disposal from Project operations would be less than significant.

In summary, the County's inert and Class III landfills would have adequate capacity to accommodate Project-generated construction and demolition waste during Project construction and Class III solid waste generation during Project operations. Thus, construction and operation impacts relative to solid waste would be less than significant.

³⁸ *Ibid*, pg. 7.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. Additionally, the City is currently implementing its “Zero-Waste-to-Landfill” goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. Recycling efforts in the City of Los Angeles in accordance with AB 939 achieved a solid waste diversion rate of 76.4 percent in 2011, the most recent year data is available.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or room of specified size on the Project Site.³⁹ Further, the Project would comply with the City’s Construction and Demolition Waste Recycling Ordinance. The Project would also promote compliance with AB 939 and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is necessary.

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

Potentially Significant Impact. As discussed previously in Checklist Question IV, the Project would not 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.

As discussed within this Initial Study, the Project could result in environmental impacts that have the potential to degrade the quality of environment as addressed herein. Potentially affected resources include Aesthetics (Views, Visual Character, Light and Glare, and Shade and Shadow), Air Quality, Cultural Resources (Historical, Archaeological, and Paleontological Resources), GHG Emissions, Hazards and Hazardous Materials, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Parks, Other Government Facilities), Recreation, Transportation/Circulation (Traffic, Access, and Parking), and Utilities (water and wastewater). An EIR will be prepared to analyze and document these potentially significant impacts.

³⁹ Ordinance No. 171,687 adopted by the Los Angeles City Council on August 6, 1997.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a given project are combined with the impacts of related projects in proximity to the Project Site, to create impacts that are greater than those of the Project alone. Related projects include past, current, and/or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given project.

Each of the topics determined to have the potential for significant impacts within this Initial Study, will be subject to further evaluation in an EIR, including evaluation of the potential for cumulatively significant impacts. Topics for which Initial Study determinations were "No Impact" or "Less Than Significant Impact" have been determined not to have the potential for significant cumulative impacts, as discussed below.

With respect to potential contributions to cumulative impacts for agricultural resources, biological resources, and mineral resources, the Project Site is located in an urbanized area, and like the Project, other development occurring in the area would also constitute urban infill in already densely developed areas. The Project Site does not contain agricultural, sensitive biological, or mineral resources, and therefore Project implementation would not be expected to result in a considerable contribution to cumulatively significant impacts on these resources.

With respect to geology and soils, geology impacts are Project Site-specific and are assessed on a project-by-project basis. As no projects are located immediately adjacent to the Project Site, cumulative geologic impacts resulting from the Project and other related projects would not occur. All projects in the City of Los Angeles would be subject to Federal, State, and local regulations and standards for seismic safety, including the CBC (as amended by the Los Angeles Building Code). Thus, cumulative impacts related to geology and soils would be less than significant.

With respect to hydrology and water quality, all development projects that require ground-disturbing activities have the potential to increase or decrease in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to NPDES permit requirements for both construction and operation, including development of SWPPPs for construction projects greater than one acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, cumulative impacts related to hydrology/water quality would be less than significant. No mitigation measures would be required and no further analysis of this topic in an EIR is necessary.

Cumulative development also has the potential to generate more students than the schools in LAUSD Local District 2 are projected to be able to accommodate. However, pursuant to Government Code Section 65995, the payment of developer fees under the provisions of SB 50 would address the impacts of new development on school facilities. The payment of this fee is deemed to provide full and complete mitigation for impacts to

school facilities. With the payment of applicable school fees, any cumulative impacts to schools would be reduced to a less than significant level.

With respect to solid waste disposal, electricity consumption, and natural gas consumption, the provision of these services is regional in nature. As indicated in the corresponding Initial Study Checklist sections above, the service providers have prepared forecasts of regional demand for these utilities and their ability to meet future demand. These are incorporated into the respective service providers' plans and strategies for meeting future needs. Utility provider plans are updated periodically to identify emerging shortfalls in service capacity not previously anticipated and develop strategies to accommodate any shortfalls. The plans address expected growth, which anticipates projected development within the service areas. The information contained in this Initial Study concerning the ability of these service providers to meet the Project's needs supports the determination that future demand for solid waste disposal, electricity consumption and natural gas consumption can be met for new growth and development, including the Project. Therefore, the Project is not expected to result in cumulatively considerable contributions to cumulatively significant impacts as the result of solid waste disposal or electricity and natural gas consumption.

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

Potentially Significant Impact. As discussed throughout this Initial Study, the Project could result in potentially significant environmental impacts associated with Aesthetics (Views, Visual Character, Light and Glare, and Shade and Shadow), Air Quality, Cultural Resources (Historical, Archaeological, and Paleontological Resources), GHG Emissions, Hazards and Hazardous Materials, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Parks, Other Government Facilities), Recreation, Transportation/Circulation (Traffic, Access, and Parking), and Utilities (water and wastewater). These impacts could have potentially adverse effects on human beings, and further analysis of these impacts is recommended in an EIR.