

# City of Los Angeles

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



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## INITIAL STUDY

### CENTRAL CITY COMMUNITY PLAN AREA

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### 222 West 2nd Project

Case Number: ENV-2016-3809-EIR

**Project Location:** 213 South Spring Street, 200–210 South Broadway, and 232–238 West 2nd Street, Los Angeles, California, 90012-3709

**Council District:** 14—José Huizar

**Project Description:** CA-LATS South, LLC (Applicant) proposes the 222 West 2nd Project (Project), which involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial floor uses, and 534,044 square feet of office uses in Downtown Los Angeles. The 2.71-acre Project Site, which is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east, also is the future site of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station. The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway. The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would provide automobile and long-term bicycle parking for the Project. The Project also includes a plaza surrounding the Metro portal, which would be integrated with a landscaped paseo located between the new building and the existing parking structure to the south. In addition, amenity decks offering a variety of social and community spaces would be provided on various levels of the new building and would include landscaped terraces, rooftop gardens, and gathering spaces. Indoor and outdoor recreational spaces as well as private balconies also would be provided.

**APPLICANT:**  
CA-LATS South, LLC

**PREPARED BY:**  
Eyestone Environmental

**ON BEHALF OF:**  
The City of Los Angeles  
Department of City Planning  
Major Projects Section

January 2017

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# CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK  
ROOM 615, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

# INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

<b>LEAD CITY AGENCY</b> City of Los Angeles Department of City Planning	<b>COUNCIL DISTRICT</b> 14	<b>DATE</b> January 25, 2017
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### RESPONSIBLE AGENCIES

South Coast Air Quality Management District, Los Angeles Regional Water Quality Control Board, CRA/LA

<b>PROJECT TITLE/NO.</b> 222 West 2nd Project	<b>CASE NO.</b> ENV-2016-3809-EIR
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<b>PREVIOUS ACTIONS CASE NO.</b> N/A	<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions.
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### PROJECT DESCRIPTION:

CA-LATS South, LLC (Applicant) proposes the 222 West 2nd Project (Project), which involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial floor uses, and 534,044 square feet of office uses in Downtown Los Angeles. The 2.71-acre Project Site, which is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east, also is the future site of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station. The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway<sup>1</sup>. The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would provide automobile and long-term bicycle parking for the Project.

The Project Site is located entirely within the Central City Community Plan area, with a land use designation of Regional Center Commercial. The site is zoned [Q]C2-4D-CDO-SN (Commercial, Height District 4 with D limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District). Height District 4 with a D limitation allows a floor area ratio (FAR) of 6.0:1. The site is also subject to [Q] conditions, which were established by Ordinance No. 180,871 in 2009 as part of the adoption of the Broadway Theater and Entertainment District Design Guide. Based on a total of 688,401 square feet of floor area (including the Metro portal), the Project would have an FAR of 5.83:1, in conformance with the Project Site's [Q]C4-2D-CDO-SN zoning classification.

The requested Project approvals include the following: Vesting Zone Change to amend Ordinance No. 180,871 to eliminate or modify [Q] Condition No. 7 (regarding 30 percent minimum and 40 percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32 G and 12.32 Q); Site Plan Review for a project with an increase of 50,000 square feet of non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05); Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08 E); Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01 and 17.15); Building Line Removal of 120 feet along the east side of Broadway, established by Ordinance No. 75,667 on October 16, 1935 (per LAMC Section 12.32 R); and other discretionary and ministerial permits and approvals that

<sup>1</sup> For ease of reference, the roadways in the Project vicinity may be referred to herein without a directional indicator (e.g., Broadway, 2nd Street, and Spring Street). Furthermore, directional references have been simplified (i.e., Broadway actually borders the Project Site to the northwest but is described herein as the west).

may be deemed necessary, including but not limited to temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

Please refer to Attachment A for a more detailed description of the Project.

**ENVIRONMENTAL SETTING:**

The Project Site is located in a highly urbanized area in Downtown Los Angeles. The Project Site is surrounded by a mix of commercial office, government and civic office, retail, and residential uses contained in a range of low-rise to high-rise buildings, which are physically separated from the Project Site by modified Avenues (as defined in the City’s General Plan Mobility Plan 2035). Immediately to the west is an existing surface parking lot and 10-story office building fronting Broadway. To the immediate north across 2nd Street is Los Angeles Times Square, which includes an 11-story office building and a six-level parking structure fronting 2nd Street. East of the Project Site across Spring Street are single-story commercial buildings and a six-level parking structure. To the south is a surface parking lot and six-story apartment building (Hosfield Building) fronting Broadway, as well as a surface parking lot and five-story apartment building (Douglas Building Lofts) fronting Spring Street.

The Project Site lies at the northern end of the Broadway Theater and Entertainment District Community Design Overlay (CDO) area, where development is encouraged to reflect the overall vision of a cohesive, pedestrian-friendly, and vibrant entertainment, commercial, and mixed-use district. The immediate area is defined by several iconic buildings, both old and new. In addition, the Project Site is subject to or located within the following: Greater Downtown Housing Incentive Area; Broadway Streetscape Plan; Transit Priority Area (TPA); City Center Redevelopment Project Area; Los Angeles State Enterprise Zone; Adaptive Reuse Incentive Area; and a Metro Rail Project Area based on construction of the Metro Regional Connector portal and station within the site.

Please refer to Attachment A for a more detailed description of the existing setting.

**PROJECT LOCATION**

213 South Spring Street, 200–210 South Broadway, and 232–238 West 2nd Street

<b>PLANNING DISTRICT</b>		<b>STATUS:</b> <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED _____ <input checked="" type="checkbox"/> ADOPTED (1988)
Central City Community Plan Area		
<b>EXISTING ZONING</b>	<b>MAX. DENSITY ZONING</b>	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN  <input type="checkbox"/> DOES NOT CONFORM TO PLAN  <input type="checkbox"/> NO DISTRICT PLAN
[Q]C2-4D-CDO-SN	Please refer to Attachment A	
<b>PLANNED LAND USE &amp; ZONE</b>	<b>MAX. DENSITY PLAN</b>	
Mixed-Use; [Q]C2-4D-CDO-SN	Please refer to Attachment A	
<b>SURROUNDING LAND USES</b>	<b>PROJECT DENSITY</b>	
Office, Retail, Residential	Please refer to Attachment A	

  **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.

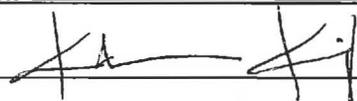
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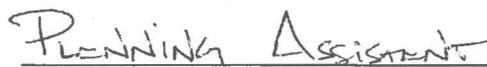
I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation 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.

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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

  
TITLE

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### 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 Section XVII, "Earlier Analysis," 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 type="checkbox"/> Aesthetics                          | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Agricultural and Forestry Resources | <input type="checkbox"/> Hydrology/Water Quality                  | <input checked="" type="checkbox"/> Transportation/Traffic             |
| <input checked="" type="checkbox"/> Air Quality              | <input checked="" type="checkbox"/> Land Use/Planning             | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <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 | <input checked="" type="checkbox"/> Public Services               |  |

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

  **BACKGROUND**

<b>PROPONENT NAME</b>	<b>PHONE NUMBER</b>
CA-LATS South, LLC (Attn: Murray McQueen)	(424) 278-6455
<b>PROPONENT ADDRESS</b>	
202 W. 1st Street, Suite 4-420, Los Angeles, CA 90012	
<b>AGENCY REQUIRING CHECKLIST</b>	<b>DATE SUBMITTED</b>
City of Los Angeles Department of City Planning	January 25, 2017
<b>PROPOSAL NAME (If Applicable)</b>	
222 West 2nd 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
<b>I. AESTHETICS.</b> Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>II. AGRICULTURE AND FOREST RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 a tree preservation policy or ordinance?	<input type="checkbox"/>	<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 dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?	<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 checked="" type="checkbox"/>	<input 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 potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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
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**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 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 a 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"/>
<b>X. LAND USE AND PLANNING.</b> 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"/>
<b>XI. MINERAL RESOURCES.</b> 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"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

**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"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XVII. TRIBAL CULTURAL RESOURCES.**

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
  - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

**XVIII. UTILITIES AND SERVICE SYSTEMS.** Would the project:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- 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?
- 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?
- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- 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?
- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g. Comply with federal, state, and local statutes and regulations related to solid waste?
- h. Other utilities and service systems?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XIX. 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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).   | <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"/> |



**DISCUSSION OF THE ENVIRONMENTAL EVALUATION** (Attach additional sheets if necessary)

PREPARED BY	TITLE	TELEPHONE #	DATE
Stephanie Eyestone-Jones Eyestone Environmental 6701 Center Drive West, Suite 900 Los Angeles, CA 90045	President	(424) 207-5333	January 25, 2017

## **A. Project Description**

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# Attachment A: Project Description

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## 1. Introduction

CA-LATS South, LLC (Applicant) proposes the 222 West 2nd Project (Project), which involves the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial uses, and 534,044 square feet of office uses in Downtown Los Angeles. The 2.71-acre Project Site, which is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east, also is the future site of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station and portal.<sup>1</sup> The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway.<sup>2</sup> The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and would replace an existing surface parking lot located on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would provide automobile and long-term bicycle parking for the Project.

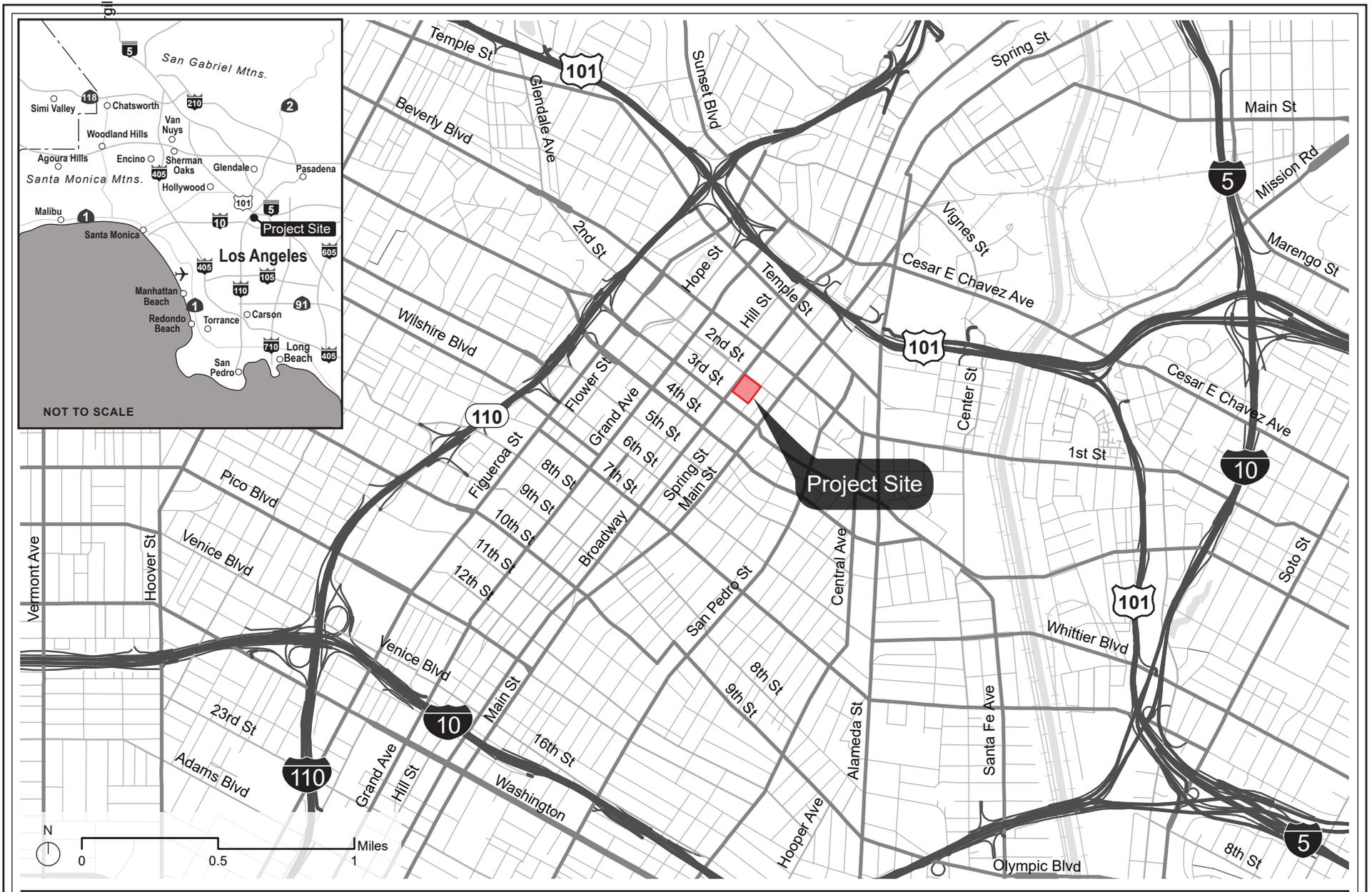
## 2. Project Location and Surrounding Uses

As shown in Figure A-1 on page A-2, the Project Site is located in the Central City Community Plan area of the City of Los Angeles (City), more specifically in the Civic Center South area of Downtown. The site consists of six parcels (APN 5149-008-029, -087, -088, -089, -907, -908) located at 213 South Spring Street, 200–210 South Broadway, and 232–238 West 2nd Street.

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<sup>1</sup> For ease of reference, the roadways in the Project vicinity may be referred to herein without a directional indicator (e.g., Broadway, 2nd Street, and Spring Street). Furthermore, directional references have been simplified (i.e., Broadway actually borders the Project Site to the northwest but is described herein as the west).

<sup>2</sup> Metro owns the portions of the Project Site where the new portal and subsurface station facilities will be located. Metro's property is included in the tract map for the Project.



**Figure A-1**  
Project Location Map

Source: LA GIS, 2016; Eyestone Environmental, 2016.

Primary regional access is provided by the Hollywood Freeway (US-101), which runs northwest/southeast approximately 0.4 mile north of the Project Site; the Harbor Freeway (CA-110), which runs north/south approximately 0.6 mile to the west; and the Santa Monica Freeway (I-10), which runs east-west and is located approximately 1.6 miles to the south. The Avenues (as defined in the City's Mobility Plan 2035) that provide local access to the Project Site and vicinity include 2nd Street, 3rd Street, Broadway, and Spring Street; 1st Street, which also provides local access near the Project Site, is classified as a Boulevard (as defined in the Mobility Plan 2035) in the Project Vicinity.

The Project Site is surrounded by a mix of commercial office, government and civic office, retail, and residential uses contained in a range of low-rise to high-rise buildings, which are physically separated from the Project Site by local roadways. Immediately to the west is an existing surface parking lot and 10-story office building fronting Broadway. To the immediate north across 2nd Street is Los Angeles Times Square, which includes an 11-story office building and a six-level parking structure fronting 2nd Street. East of the Project Site across Spring Street are single-story commercial buildings and a six-level parking structure. To the south is a surface parking lot and six-story apartment building (Hosfield Building) fronting Broadway, as well as a surface parking lot and five-story apartment building (Douglas Building Lofts) fronting Spring Street.

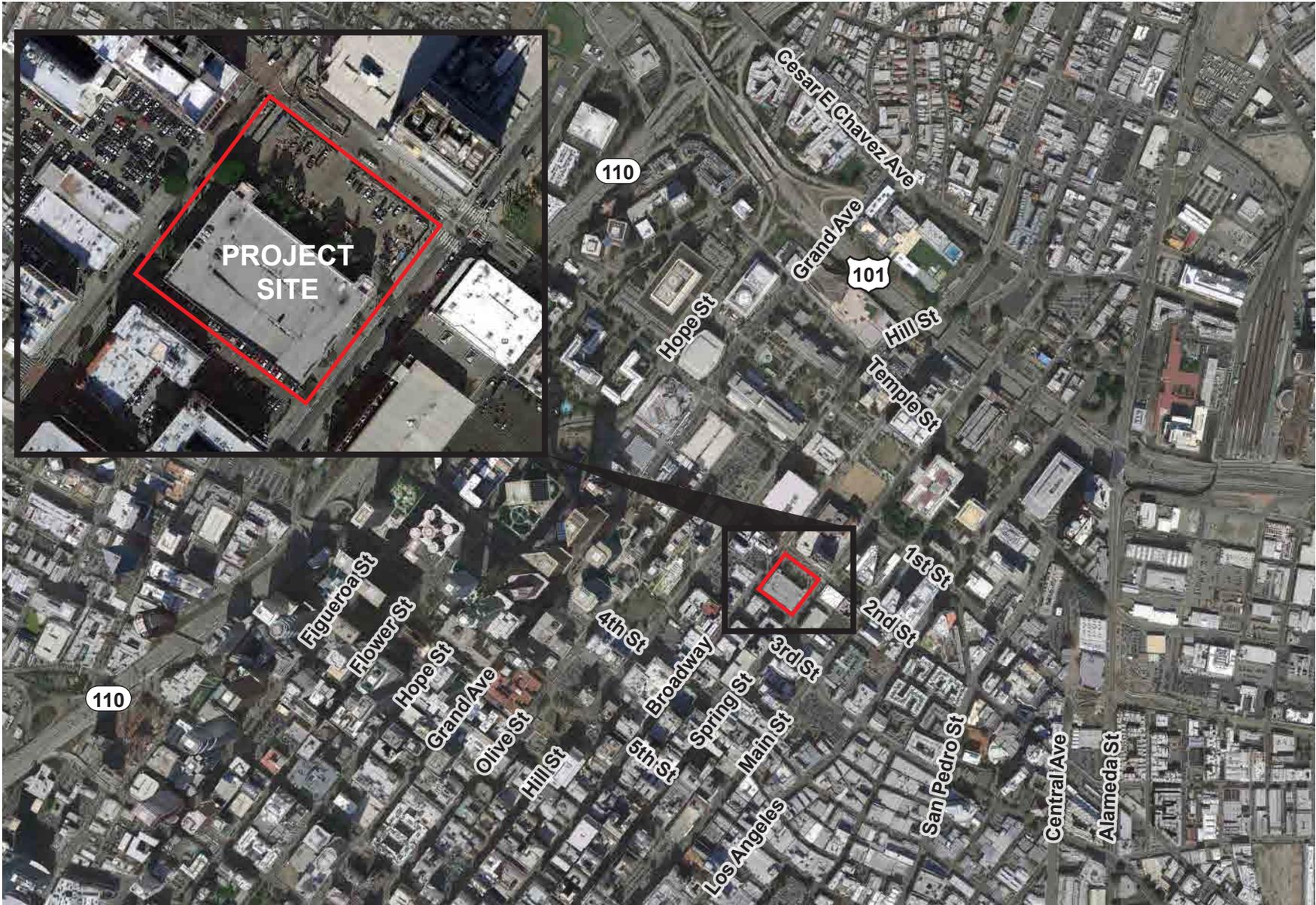
The Project Site lies at the northern end of the Broadway Theater and Entertainment District Community Design Overlay (CDO) area, where development is encouraged to reflect the overall vision of a cohesive, pedestrian-friendly, and vibrant entertainment, commercial, and mixed-use district. The immediate area is defined by several iconic buildings, both old and new, including the Bradbury Building to the south, the Los Angeles Times buildings and City Hall to the north, the new 11-story U.S. federal courthouse on Broadway between 1st and 2nd Streets, the 10-story Los Angeles Police Department (LAPD) Headquarters, and the 15-story Caltrans buildings to the north and east, respectively. Residential uses in the Project vicinity include the 50-unit Douglas Building Lofts at 257 South Spring Street, the 135-unit Higgins Building Lofts at 108 West 2nd Street, and the seven-story, 40-unit Pan American Lofts at 253 South Broadway.

An aerial photograph depicting on-site and surrounding uses is provided in Figure A-2 on page A-4.

### **3. Background and Existing Site Conditions**

#### **a. Existing Uses**

As shown in Figure A-2, the northern portion of the Project Site is developed with a surface parking lot, which is currently in use as a staging area for construction of the



**Figure A-2**  
Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2016; Eyestone Environmental, 2016.

Metro Regional Connector 2nd Street/Broadway rail station and portal. Pursuant to a right of entry agreement, Metro has had exclusive control and use of the surface parking area since March 2015 and will continue to use it as a construction staging/laydown location for the Regional Connector project until up to September 2021. At that time, control of the surface parking lot (with the exception of the portal area), will revert back to the Applicant. The surface parking lot previously included 99 vehicular parking spaces.

The southern portion of the Project Site contains a five-story, approximately 67-foot-tall parking structure that includes rooftop parking and two subterranean levels. The structure currently provides 1,460 vehicular spaces, which are used for parking by tenants of Los Angeles Times Square, including the Los Angeles Times, as well as other businesses and commuters in the immediate area. Access to the parking structure is provided via one driveway on Broadway and two driveways on Spring Street.

Current landscaping on the Project Site is limited to street trees and a narrow landscaped parkway that traverses the center of the site along the northerly edge of the existing parking structure. Trees in these areas include: 19 on-site trees that meet the City's minimum size threshold for regulation as non-protected trees (i.e., trees with a trunk diameter at breast height (dbh) greater than 8 inches); 12 on-site palm trees that also meet the City's minimum size threshold for regulation; and six street trees along Broadway and Spring Street, none of which meet the definition of a protected tree as defined in the City's Municipal Code, although all are at least 8 inches dbh.<sup>3,4</sup> The landscaped parkway also includes shrubs and limited areas of turf, along with park benches.

The Project Site is well served by transit and is located approximately 700 feet from the Civic Center/Grand Park Metro Purple and Red Line station (located at the southwest corner of 1st Street and Hill Street). In addition, as previously mentioned, a Metro Regional Connector portal and station are currently under construction on-site. The site is also served by Metro Bus Lines 2, 4, 30, 33, 35, 40, 45, 68, 83, 84, 92, 302, 330, 728, 733, 745, and Los Angeles Department of Transportation (LADOT) Dash Line D.

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<sup>3</sup> *Palms often are not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time; thus, they are listed separately herein. Palms are not specifically addressed in City requirements.*

<sup>4</sup> *Psomas, Tree Inventory Report for the Tribune—South Parcel Project Site at 213 South Spring Street in the City of Los Angeles, California, Revised September 9, 2016; see Appendix A.*

## **b. Land Use and Zoning Designations**

The Project Site is located entirely within the Central City Community Plan area, with a land use designation of Regional Center Commercial. The site is zoned [Q]C2-4D-CDO-SN (Commercial, Height District 4 with D limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District). Height District 4 with a D limitation allows a floor area ratio (FAR) of 6.0:1. The site is also subject to [Q] conditions, which were established by Ordinance No. 180,871 in 2009 as part of the adoption of the Broadway Theater and Entertainment District Design Guide. The [Q] conditions prohibit certain types of land uses, particularly on the ground floor along the streetwall; dictate building form and massing, including building heights and setbacks along the streetwall, lot coverage requirements for buildings over 150 feet in height, and ground floor treatments; and specify the location of parking and mechanical equipment. Signage regulations were originally included in the [Q] conditions but were later removed by Ordinance No. 184,055 in 2016 and replaced with the Historic Broadway Sign Supplemental Use District (Broadway Sign District). The Broadway Sign District supports and enhances historic preservation, economic development, and revitalization of the Broadway Theater and Entertainment District and allows for a variety of signage that contributes to its historic nature.

The Project Site is located in the Greater Downtown Housing Incentive Area, which allows an unlimited number of dwelling units in residential projects. In addition, the Project Site is subject to or located within the following: Broadway Streetscape Plan; Transit Priority Area (TPA); City Center Redevelopment Project Area; Los Angeles State Enterprise Zone; Adaptive Reuse Incentive Area; and a Metro Rail Project Area based on construction of the Metro Regional Connector portal and station within the site. In addition, a 5-foot Building Line was established along Broadway by Ordinance No. 75,667.

## **4. Description of Proposed Project**

### **a. Overview of the Proposed Development**

As previously discussed, the 222 West 2nd Project involves the development of a 30-story, 449-foot-tall, mixed-use building with 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial retail floor area, and 534,044 square feet of office uses.<sup>5</sup> The 2.71-acre Project Site also would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under

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<sup>5</sup> *The building's height would measure 435 feet at the highest roofline and 449 feet at the top of the highest parapet, which would be set back from the roofline.*

construction. Based on a total of 688,401 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 5.83:1, in conformance with the Project Site's [Q]C4-2D-CDO-SN zoning classification. Refer to Figure A-3 on page A-8 for a conceptual site plan of the Project.

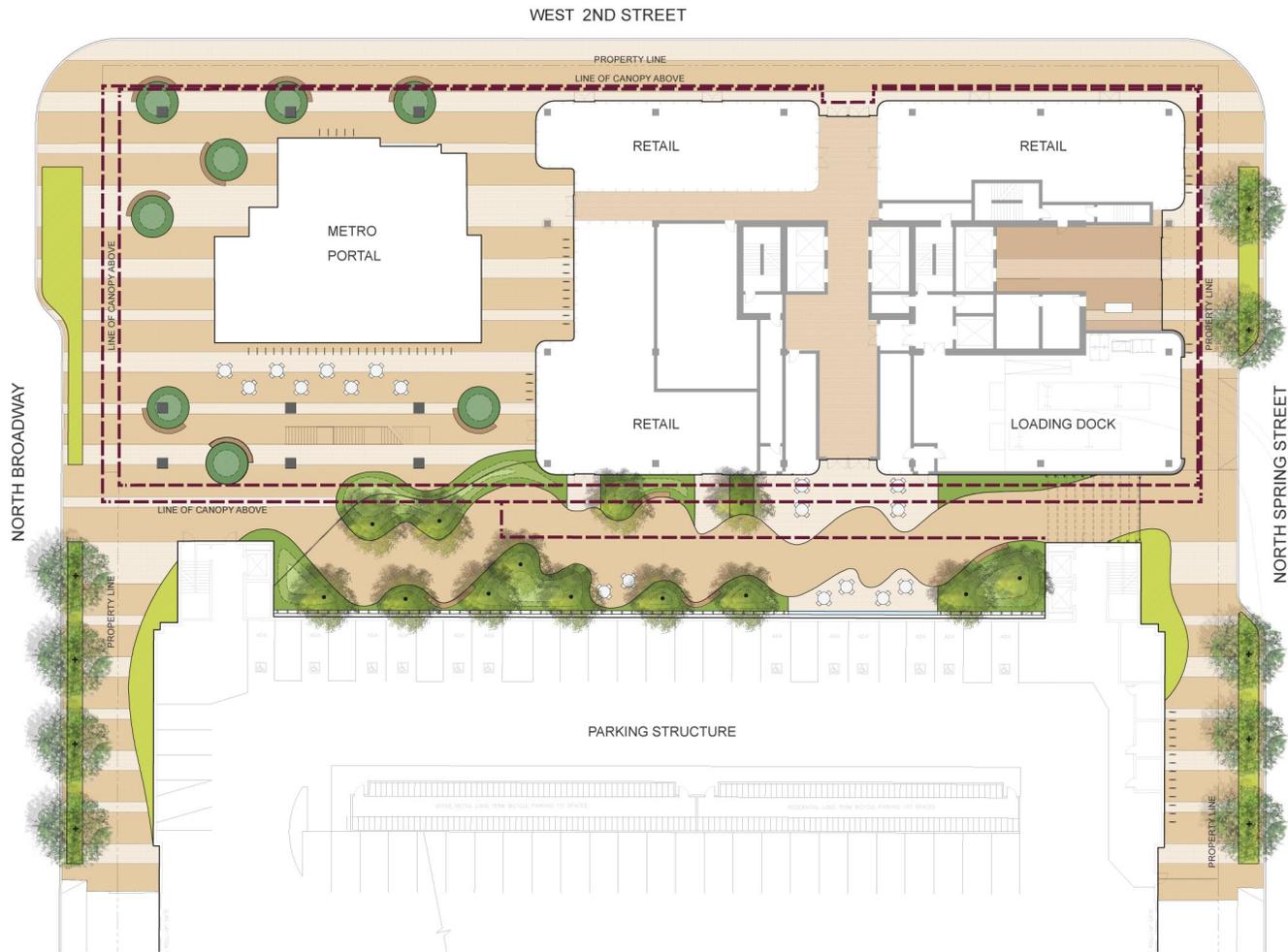
In general, the proposed uses would be located in distinct areas of the new building. The ground floor would include commercial spaces fronting 2nd and Spring Streets, as well as the interior of the site (i.e., facing the Metro portal and the pedestrian paseo), with a residential lobby and loading area located along Spring Street.<sup>6</sup> Office space would be provided on levels 2 through 22, while the residential uses would be on levels 23 through 30. The proposed residences would include 12 studios, 42 one-bedroom units, 40 two-bedroom units, and 13 three-bedroom units ranging from approximately 650 square feet to 1,630 square feet in size. In addition, a single basement level would house mechanical rooms and storage.

As shown in the renderings provided in Figure A-4 and Figure A-5 on pages A-9 and A-10, the proposed building has been designed as a series of stacked volumes of varying sizes (floorplates), with shifting footprints and alternating types of curtain walls, capped by a bronze "crown." Levels 1 through 7 would comprise one volume and serve as the building podium, with levels 2 through 7 extending over the Metro portal. Levels 8 through 14 would comprise the next volume, which would be stepped back substantially from Broadway and slightly from 2nd Street. Levels 15 through 18 and levels 19 through 26 also would be separate volumes, with the footprint of each shifting back and forth in relation to the adjacent streets. Levels 27 through 30 would comprise the smallest volume, which would be stepped back the furthest from both Broadway and 2nd Street. The highest two volumes, levels 27 through 30 and the eastern half of levels 19 through 26, would include a bronze façade, serving as the building "crown." Overall, the height and massing of the building would shift away from Broadway toward Spring Street.

The shifting volumes in the building design would create a series of rooftop decks and terraces. Amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of useable common open space and 800 square feet of useable private open space would be provided for Project residents.

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<sup>6</sup> *Operating hours for the loading dock would be 24 hours per day, seven days per week.*



Building Canopy Lines



**Figure A-3**  
Ground-Level Conceptual Site Plan



**Figure A-4**  
Conceptual Rendering—View from Broadway



**Figure A-5**  
Conceptual Rendering—Aerial View from the South

A landscaped passage or paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. In addition, street trees and streetscape plantings would be introduced along Broadway and Spring Street. The Project's landscaping would include drought-tolerant plants including both native and adaptive native plant materials. Further, the landscape plan would incorporate an efficient irrigation system.

As previously indicated, the Metro Regional Connector 2nd Street/Broadway rail station and portal, currently under construction, would be located at the northwest corner of the Project Site. The at-grade portal would include ticket booths, kiosks, information signs, stairs, escalators, and elevators to serve the subterranean Metro station. The mixed-use building would be built above the Metro portal, with the base of level 2 essentially serving as a roof over the station entrance. A plaza surrounding the portal would include planted areas, benches and café seating, and bicycle parking. The design of the plaza around the portal would be integrated and consistent with the paseo, thus creating a larger, public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street. Upon completion, the Metro Regional Connector would consist of a 1.9-mile underground light-rail system connecting the Metro Gold Line to the 7th Street/Metro Center station. The Regional Connector includes the 2nd Street/Broadway rail station, as well as two additional new stations in the Downtown area.

Project lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. All lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring buildings and the surrounding area. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Primary façade materials would include glass and various types of metal panels such as anodized aluminum, stainless steel, or bronze. Glass would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

Project signage would be integrated with and compliment the overall aesthetic character of the Project and comply with the standards and goals of the Historic Broadway

Sign Supplemental Use District. Project signage could include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types. Wayfinding signs would be located at access points to the on-site parking garage, paseo, commercial and residential entries, corridors, and elevator lobbies. Metro signage would be integrated with the overall signage concept. No off-premises billboard advertising is proposed as part of the Project.

## b. Parking and Access

The existing five-level parking structure located on the southern portion of the Project Site would remain and provide the required vehicular parking and long-term bicycle parking for the proposed uses. More specifically, the existing 1,460 parking spaces within the garage would be reconfigured to provide 1,436 vehicular spaces and 218 long-term bicycle parking spaces (plus an additional 68 short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). The Project would require 601 tenant vehicular parking spaces per Los Angeles Municipal Code (LAMC), based on bicycle parking and transit credit deductions, plus 0.25 spaces per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2.<sup>7</sup> Accordingly, surplus parking would remain available for the nearby Los Angeles Times buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.<sup>8</sup>

Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

The Project does not include street dedications. However, sidewalk easements would be provided along Broadway, 2nd Street, and Spring Street in order to comply with the City's General Plan Mobility Plan 2035 standards.

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<sup>7</sup> *Parking requirements, including required bicycle parking and credit reductions, are based on LAMC Sections 12.21.A4 (Off-Street Automobile Parking Requirements), 12.21.A4(i) (Exception Downtown Business District), 12.21.A4(k) (Fractional Space), 12.21.A4(p) (Exception for Central City Area), 12.21.A4(x)(3) (Exception for Specified Exception Areas), and 12.21.A16(a)(2) (Bicycle Parking for Commercial Uses). Parking will be fully addressed in the EIR to be prepared for the Project.*

<sup>8</sup> *Off-site parking covenants per County of Los Angeles Recorder Instrument Nos. 90-2043634, 97-1672752, 98-854779, and 05-1924091.*

## c. Sustainability Features

The Project incorporates the principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses. Additionally, a number of specific sustainable design components would be incorporated into the Project, including the following:

- Water-efficient plantings with drought-tolerant species;
- Shade trees in public areas;
- Green walls in some outdoor areas;
- Energy-efficient lighting;
- Fenestration designed for solar orientation;
- Use of recyclable materials for flooring and demisable partitions in limited amounts;
- Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking;
- Electric vehicle charging infrastructure; and
- Permeable pavement in the paseo.

## 5. Construction Activities and Phasing

The proposed improvements would replace the existing surface parking lot on the northern portion of the Project Site, which is currently used for construction staging for the new on-site Metro 2nd Street/Broadway rail station and portal. In addition, all 37 existing trees on the Project Site are planned for removal and would be replaced with new landscaping, including canopy trees, street trees, and streetscape plantings.

Project construction is expected to occur in one primary phase, with no overlap with construction of the Metro portal and station on-site. As previously discussed, the on-site portal and station are currently under construction, and the Metro Regional Connector line is forecasted to open in 2021. Construction of the Project is anticipated to begin in 2022 and be complete by 2025. Construction activities would occur in accordance with LAMC requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M.

Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. Construction activities would require approximately 7,000 cubic yards of grading, all of which would be exported off-site to Chiquita Canyon Landfill and/or Irwindale Landfill. The haul route to/from Chiquita Canyon Landfill is anticipated to follow segments of 2nd Street, Spring Street, 3rd Street, and Aliso Street in Downtown Los Angeles; CA-110, US-101, CA-170, and I-5; as well as Newhall Ranch Road, SR-126, and Henry Mayo Drive in Castaic. Alternatively, the haul route to/from Irwindale Landfill would follow segments of 2nd Street, Spring Street, 4th Street, Los Angeles Street, El Monte Busway East, and Arcadia Street in Downtown; US-101 and I-10; and Vincent Drive in Irwindale.

## 6. Necessary Approvals

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

- Vesting Zone Change to amend Ordinance No. 180,871 to eliminate or modify [Q] Condition No. 7 (regarding 30 percent minimum and 40 percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32 G and 12.32 Q);
- Site Plan Review for a project with an increase of 50,000 square feet of non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05);
- Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08 E);
- Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01 and 17.15);
- Building Line Removal of 120 feet along the east side of Broadway, established by Ordinance No. 75,667 on October 16, 1935 (per LAMC Section 12.32 R); and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

In addition, the following agencies are considered Responsible Agencies under CEQA whose approval or permits from whom may be required:

- South Coast Air Quality Management District (SCAQMD);

- Los Angeles Regional Water Quality Control Board (LARWQCB); and
- CRA/LA.

## **B. Explanation of Checklist Determinations**

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# Attachment B: Explanation of Checklist Determinations

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

## I. Aesthetics

*Would the project:*

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

**Less Than Significant Impact.** A scenic vista is a broad view that includes a visual resource(s). The Central City Community Plan designates the Harbor Freeway (CA-110), which runs north/south approximately 0.6 mile to the west of the Project Site, as a scenic freeway, as it offers northbound views of the Downtown skyline and the San Gabriel Mountains in the distance.<sup>1</sup> The Project involves the development of a 30-story mixed-use building on a site that includes a five-story parking structure (which would remain) but currently lacks permanent structures where the proposed building would be located.<sup>2</sup> As such, the Project could be visible from surrounding scenic view points, including from CA-110. However, the Project is a mixed-use residential and employment center project

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<sup>1</sup> City of Los Angeles, *Central City Community Plan, General Plan Land Use Map, July 7, 2009.*

<sup>2</sup> *The northern portion of the Project Site, where the proposed 30-story building would be built, is currently used for construction staging associated with the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector transit project. Metro is constructing a below grade rail station and station portal (the 2nd Street/Broadway station) in this portion of the site, which will be completed and open to the public before construction of the proposed Project commences. Prior to Metro’s occupation of this portion of the Project Site, it was used as a surface parking lot.*

that will be located on an infill site within a transit priority area.<sup>3</sup> Accordingly, under Senate Bill (SB) 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze the Project's potential effects on scenic vistas.

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

**No Impact.** The Project Site currently includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed), as well as a narrow landscaped parkway that traverses the center of the site and several street trees, none of which are considered scenic resources. There are no historic buildings or structures located on-site. Furthermore, there are no unique geologic or topographic features located on the Project Site, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. Although CA-110 located 0.6 mile west of the Project Site is designated as a scenic freeway within the Central City Community Plan, no impacts to scenic resources within a City-designated scenic highway would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact.** The Project would change the visual character and quality of the Project Site and its surroundings by introducing a 30-story mixed-use building on a site that currently includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot, which will contain Metro's 2nd Street/Broadway station portal. While the Project could have the potential to degrade the existing visual character or quality of the Project Site and the surrounding area, the Project is a mixed-use residential and employment center project that will be located on an infill site within a transit priority area. Accordingly, under SB 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze the Project's potential effects on visual character and quality.

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<sup>3</sup> Los Angeles Department of City Planning, *Great Streets Program Interactive Map, Transit Priority Area Layer*, <https://ladcp.maps.arcgis.com/apps/webappviewer/index.html?id=02d509dfe1ea458da1157b516249f4d9>, accessed January 3, 2017.

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

**Less Than Significant Impact.** The Project Site currently generates low to moderate levels of artificial light and glare typical of urbanized areas. Existing light sources on-site include low-level security lighting, vehicle headlights, and street lighting, while existing glare sources include vehicle surfaces within unscreened or open portions of the parking structure, including the rooftop parking level. The Project would introduce new sources of light and glare that are typically associated with residential and commercial buildings, such as architectural lighting, signage lighting, interior lighting, security and wayfinding lighting, and building surfaces such as metal and glass. In addition, the Project would introduce a 30-story mixed-use building that could potentially shade adjacent land uses that may be sensitive to shading. However, the Project is a mixed-use residential and employment center project that will be located on an infill site within a transit priority area. Accordingly, under SB 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze how the Project's light, glare, and shading will affect the Project area. If appropriate, Project design features (PDFs) addressing light and glare will be incorporated into the Project and detailed in the EIR.

## **II. Agricultural and Forest Resources**

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

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

**No Impact.** The Project Site is located in an urbanized area and currently includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). No agricultural uses or operations occur on-site. In addition, the Project Site and surrounding area are not

mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.<sup>4</sup> As such, the Project would not convert farmland to non-agricultural use. No impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?**

**No Impact.** The Project Site is not zoned for agricultural use under the Los Angeles Municipal Code (LAMC). Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are not enrolled under a Williamson Act Contract.<sup>5</sup> Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts to agricultural uses or a Williamson Act Contract would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is 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.** The Project Site is located in an urbanized area and does not include any forest or timberland.<sup>6</sup> Further, the Project Site is currently zoned for commercial land uses and is not zoned for timberland or forest land. Therefore, the Project would not rezone forest land or timberland as defined by the Public Resources Code. No impacts to forest land or timberland would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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<sup>4</sup> California Department of Conservation, *California Important Farmland Finder*, <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed October 11, 2016.

<sup>5</sup> California Department of Conservation, *Los Angeles County Williamson Act FY 2015/2016*, [ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA\\_15\\_16\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf), accessed October 11, 2016.

<sup>6</sup> California Department of Forestry and Fire Protection, *Fire and Resources Assessment Program, Land Cover Map, Multi-Source Data Compiled in 2006*, [http://frap.fire.ca.gov/data/frapgismaps/pdfs/fvegwhr13b\\_map.pdf](http://frap.fire.ca.gov/data/frapgismaps/pdfs/fvegwhr13b_map.pdf), accessed October 11, 2016.

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

**No Impact.** As mentioned above, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land. No impacts to forest land would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**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?**

**No Impact.** As described above, the Project Site is located within an urbanized area. The Project Site and surrounding area are not mapped as farmland or zoned for farmland or agricultural use and do not contain any agricultural uses. As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts to farmland would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**III. Air Quality**

*Where available and applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:*

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

**Potentially Significant Impact.** The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than ten microns in size (PM<sub>10</sub>), particulate matter less than 2.5 microns in size (PM<sub>2.5</sub>), and lead).<sup>7,8</sup> As such, the Project would be subject to the SCAQMD's 2012 Air Quality Management Plan (AQMP).<sup>9</sup> The AQMP contains a

<sup>7</sup> A redesignation request to Attainment for the 24-hour PM<sub>10</sub> standard is pending with the United States Environmental Protection Agency (USEPA).

<sup>8</sup> Lead has a Partial Nonattainment designation for the Los Angeles County portion of the Basin only.

<sup>9</sup> A Revised Draft 2016 AQMP was published in October 2016; however, the 2012 AQMP remains in effect at this time.

comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment.<sup>10</sup> With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, Project development could have an adverse effect on the SCAQMD’s implementation of the AQMP. Therefore, further analysis of this topic in the EIR is required to determine the Project’s consistency with the SCAQMD’s AQMP.

With regard to the Project’s consistency with the Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (Metro), see Response to Checklist Question XVI.b, below.

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

**Potentially Significant Impact.** The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sources of construction-related pollutants would include construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, energy consumption, and other on-site activities. Construction and operation of the Project has the potential to result in the violation of air quality standards or contribute to an existing or projected air quality violation. Therefore, further analysis of this topic in the EIR is required to determine the Project’s impacts related to construction and operational air pollutant emissions.

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<sup>10</sup> SCAG serves as the federally-designated metropolitan planning organization (MPO) for the Southern California region.

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

**Potentially Significant Impact.** As discussed above, Project construction and operation would emit air pollutants in the Basin, which is currently in non-attainment of federal and state air quality standards for ozone, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead. Therefore, 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. As such, further analysis of this topic in the EIR is required to determine the Project's potential to result in cumulatively considerable impacts from criteria pollutants.

**d. Expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Impact.** As discussed above, the Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses, which may be exposed to substantial pollutant concentrations. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential to result in exposure of sensitive receptors to substantial pollutant concentrations.

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

**Less Than Significant Impact.** No objectionable odors are anticipated as a result of either construction or operation of the Project. Project construction would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402.<sup>11</sup>

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. While on-site trash receptacles introduced on-site would have the potential to create odors, trash receptacles

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<sup>11</sup> SCAQMD Rule 402: *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

would be located, contained, and maintained in a manner that promotes odor control. Thus, no substantially adverse odor impacts are anticipated. Thus, impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is 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 by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact.** The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). The Project Site includes limited ornamental landscaping, including non-protected tree species, in a narrow landscaped parkway, as well as several street trees. Due to the developed nature of the Project area, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Impacts to these species would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). No riparian or other sensitive natural community exists on the Project Site or in the immediate area. Thus, the Project would not have an effect on any riparian habitat or other sensitive natural community, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). No water bodies or federally protected wetlands, as defined by Section 404 of the Clean Water Act, exist on the Project Site or in the vicinity. As such, the Project would not have any effect on federally protected wetlands, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**Less Than Significant With Mitigation Incorporated.** As discussed above, the Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's future 2nd Street/Broadway station portal is currently being constructed). There are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity.

According to the Tree Inventory Report prepared for the Project and included as Appendix IS-1 of this Initial Study, there are no native or protected trees located on-site or within the street parkway. Trees in these areas include: 19 on-site trees that meet the City's minimum size threshold for regulation as non-protected trees (i.e., trees with a trunk diameter at breast height (dbh) greater than 8 inches); 12 on-site palm trees that also meet the City's minimum size threshold for regulation; and six street trees along Broadway and Spring Street, none of which meet the definition of a protected tree as defined in the City's Municipal Code, although all are at least 8 inches dbh.<sup>12,13</sup> The landscaped parkway also includes shrubs and limited areas of turf.

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<sup>12</sup> Palms often are not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time. Palms are not specifically addressed in City requirements. Additionally, (Footnote continued on next page)

Although unlikely given the urbanized nature of the Project area, the on-site trees and adjacent street trees (all of which are proposed for removal) could potentially provide temporary suitable habitat for nesting migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA), as well as Sections 3503, 3503.5, 3511, and 3513 of the California Fish and Game Code. Together, these existing federal and state regulations protect all native migratory birds and their nests and make it unlawful to “take” (e.g., hunt, pursue, kill, harm, harass) any migratory bird and its active nest(s). To ensure the Project complies with these federal and state regulations, the following mitigation measure is proposed:

**Mitigation Measure IS-1:** To the extent feasible, Project tree removal activities shall be scheduled outside the nesting season for migratory birds (typically from February 15 to August 31). However, to the extent that Project tree removal activities must occur during the nesting season, all suitable habitat shall be thoroughly surveyed by a qualified biologist for the presence of nesting birds prior to removal. If any active nests are detected, the area shall be flagged, along with a minimum 50-foot buffer (this buffer may range between 50 and 300 feet, as determined by the monitoring biologist), and shall be avoided until the nesting cycle has completed or the monitoring biologist determines that the nest has failed. The results of the survey(s) shall be reported to the City of Los Angeles (i.e., the lead agency) to document compliance with applicable state and federal laws pertaining to the protection of nesting birds.

With implementation of the mitigation measure identified above, impacts would be less than significant. No further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact.** The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as protected by the City. Trees that have been planted as part of a

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*southern live oaks are not protected by the City’s tree ordinance, as this species is not indigenous to California.*

<sup>13</sup> *Psomas, Tree Inventory Report for the Tribune—South Parcel Project Site at 213 South Spring Street in the City of Los Angeles, California, Revised September 9, 2016; see Appendix IS-1 of this Initial Study.*

tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

As discussed above, landscaping within the Project Site is limited, and no native or protected trees are located within the Project Site. Trees within the Project Site include:<sup>14</sup>

- Nineteen on-site trees that meet the City’s minimum size threshold for regulation as non-protected trees (i.e., trees with a trunk diameter at breast height (dbh) greater than 8 inches)—these trees include 13 Canary Island pines (*Pinus canariensis*), five sweetgums (*Liquidambar styraciflua*), and one tree-of-heaven (*Ailanthus altissima*).
- Twelve on-site palm trees that also meet the City’s minimum size threshold for regulation—these palm trees include three king palms (*Archontophoenix alexandrae*) and nine Mexican fan palms (*Washingtonia robusta*).<sup>15</sup>
- Six street trees along Broadway and Spring Street, all of which are at least 8 inches dbh—these street trees include two fern pines (*Podocarpus gracilior*), one Indian laurel fig (*Ficus microcarpa*), and three southern live oaks (*Quercus virginiana*).

None of these trees meet the definition of a protected tree as defined in the City’s Municipal Code, although all are at least 8 inches dbh. The southern live oaks are not protected by the City’s tree ordinance as this species is not indigenous to California. The Indian laurel fig will be removed by Metro during construction of the on-site 2nd Street/Broadway rail station (below grade) and station portal prior to Project construction.

All trees on the Project Site are proposed for removal. As mature trees with established root systems and palms with smaller fibrous root systems are unlikely to survive relocation and transplanting, relocation is not recommended for any of the trees. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, street trees would be replaced on a 2:1 basis. Furthermore, in accordance with LAMC requirements, an estimated 42 new trees would be planted within the Project Site. The

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<sup>14</sup> *Ibid.*

<sup>15</sup> *Palms often are not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time. Palms are not specifically addressed in City requirements. Additionally, southern live oaks are not protected by the City’s tree ordinance, as this species is not indigenous to California.*

new tree species would be drought-tolerant and/or climate-adapted and would primarily require moist to dry soil conditions. In addition, smart irrigation systems with flow sensors and drip tubing delivery systems would be used. Thus, the planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. Therefore, impacts related to any conflict with local policies or ordinances protecting biological resources would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**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.** The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot (where Metro's 2nd Street/Broadway station portal is currently being constructed). The Project Site includes limited ornamental landscaping in the form of a narrow landscaped parkway and several street trees. As such, the Project Site does not support any important habitat or natural communities. Furthermore, the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project Site.<sup>16</sup> Thus, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other related plan, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

## V. Cultural Resources

*Would the project:*

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

**Potentially Significant Impact.** CEQA Guidelines Section 15064.5 defines a historic resource as a resource that is: (1) listed in or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Public Resources Code Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in Public

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<sup>16</sup> USFWS, *Conservation Plan and Agreements Database, Region 8*, [http://ecos.fws.gov/conserv\\_plans/public.jsp](http://ecos.fws.gov/conserv_plans/public.jsp), accessed October 13, 2016.

Resources Code Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be historically significant if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify potentially significant historic resources throughout the City.

The Project Site includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot. Although no historical resources have been identified on-site, the Project Site lies at the northern end of the Broadway Theater and Entertainment District Community Design Overlay (CDO) area and the associated Historic Broadway Sign Supplemental Use District (Broadway Sign District), within which a number of historic and potentially historic resources are located. Other historic and potentially historic buildings also exist outside of these districts in the Project vicinity. Given the proximity of several off-site historic or potentially historic buildings, further analysis in the EIR is required to determine the Project's potential impacts with regard to historic resources.

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

**Potentially Significant Impact.** CEQA Guidelines Section 15064.5(a)(3)(D) 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 area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time likely have been previously disturbed or, to the extent not previously disturbed, may be disturbed as part of Metro's ongoing construction of the 2nd Street/Broadway rail station on the northern portion of the Project Site. Nonetheless, the Project would require grading, excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station, and other construction activities that could have the

potential to disturb existing but undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

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

**Potentially Significant Impact.** Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading; excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street /Broadway station; and other construction activities that could have the potential to disturb existing but undiscovered paleontological artifacts. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

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

**Less Than Significant Impact.** As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with state law, including CEQA Guidelines Section 15064.5, Public Resources Code Section 5097.98, and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the relevant portion of the Project Site would be suspended, and the Los Angeles Department of Public Works (LADPW) as well as the County Coroner would be notified immediately. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Project's impact on human remains would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

## VI. Geology and Soils

The following analysis is based, in part, on the *Soils and Geology Report to Support the Environmental Impact Report* (Soils and Geology Report) dated August 16, 2016, and revised November 3, 2016, prepared by Geotechnologies, Inc., unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study. In addition, relevant information is provided in the following report, which is on file with the Department of City Planning (Case No. VTT-74320): *Preliminary Geotechnical Engineering Investigation to Satisfy the Requirements for Filing a Vesting Tentative Tract Map with the Department of City Planning* (Geotechnical Investigation) dated August 11, 2016 and prepared by Geotechnologies, Inc.

*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.**

**Less Than Significant Impact.** Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch). Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, buried thrust faults are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist–Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist–Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. Additionally, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on the Soils and Geology Report and a review of the City of Los Angeles General Plan Safety Element, the Project Site is not located within an established Alquist–Priolo Earthquake Fault Zone, nor is it within a City-designated Fault Rupture Study Area.<sup>17,18</sup> No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The nearest designated Earthquake Fault Zone is associated with the active Hollywood Fault, located approximately 4.5 miles north of the Project Site. In addition, the active Raymond Fault is located approximately 5 miles to the north. Furthermore, although the Los Angeles segment of the active Puente Hills blind thrust fault lies beneath Downtown Los Angeles, it is located at a depth of approximately 4 miles according to USGS data and has no surface trace; as such, its potential for ground surface rupture is considered remote. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low, and as such, impacts would be less than significant. No mitigation measures would be required, and no further analysis of this topic in the EIR is required.

### ii. Strong seismic ground shaking?

**Less Than Significant Impact.** The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active faults in the region. As previously stated, the closest active faults are the Hollywood Fault and Raymond Fault, located approximately 4.5 and 5 miles north of the Project Site. However, the Project would be designed and constructed in accordance with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, as well as the California Building Code. The California Building Code regulates building construction such that structures can withstand minor earthquakes without damage and major earthquakes without collapse. Additionally, the Project would be designed and constructed in accordance with the recommendations of a design-level geotechnical investigation. Accordingly, impacts with respect to strong seismic ground shaking would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

### iii. Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact With Mitigation.** Liquefaction involves a sudden loss in strength of saturated, cohesionless soils that are subject to ground vibration and

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<sup>17</sup> *State of California, California Geological Survey, Special Studies Zones for Los Angeles Quadrangle, dated January 1, 1977, [http://gmw.consrv.ca.gov/shmp/download/quad/LOS\\_ANGELES/maps/LOSANGELES.pdf](http://gmw.consrv.ca.gov/shmp/download/quad/LOS_ANGELES/maps/LOSANGELES.pdf), accessed October 14, 2016.*

<sup>18</sup> *Los Angeles General Plan Safety Element, Exhibit A, Alquist–Priolo Special Study Zones & Fault Rupture Study Areas, November 1996, p. 47).*

results in temporary transformation of the soil to a fluid mass. If the liquefying layer is near the surface, the effects are much like that of quicksand for any structure located on it. If the layer is deeper in the subsurface, it may provide a sliding surface for the material above it. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine- to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must be of a sufficient level to induce liquefaction.

The State Seismic Hazards Maps indicate the Project Site is located within a liquefaction zone, as does the City's Zone Information and Map Access System (ZIMAS).<sup>19,20</sup> This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. However, the proposed building has been designed to be supported on Tertiary-age bedrock of the Fernando Formation, which was encountered in site borings at depths between 15 and 22 feet below ground surface. Given the density and long tectonic history of the Fernando Formation, this bedrock is not considered susceptible to liquefaction. Nevertheless, given the Project Site's location within a liquefaction zone, the following mitigation measure would be implemented to ensure the use of engineered foundation design techniques appropriate for areas subject to liquefaction:

**Mitigation Measure IS-1:** All foundations to support the proposed structure shall bear in competent unweathered Fernando Formation bedrock. In particular, the high-rise portion of the structure shall be supported by a mat foundation system, bearing in competent Fernando Formation bedrock. The podium portion of the structure that will be underlain by the subterranean level shall be supported by conventional foundations, deepened to bear in competent Fernando Formation bedrock. In addition, the podium portion of the structure that will be built at-grade shall be supported by end-bearing belled caissons, deepened to bear in competent Fernando Formation bedrock; excepting therefrom any portions of the podium structure that connect to Metro's 2nd Street/Broadway rail station facilities structure.

All foundation excavations shall be observed by a qualified geotechnical engineer to verify penetration into the recommended bearing materials. These observation(s) shall be performed prior to

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<sup>19</sup> *State of California, California Geological Survey, Seismic Hazard Zones, Los Angeles Quadrangle, dated March 25, 1999, [http://gmw.consrv.ca.gov/shmp/download/pdf/ozn\\_la.pdf](http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf), accessed October 14, 2016.*

<sup>20</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org>, accessed October 14, 2016.*

the placement of reinforcement. If necessary, foundations shall be further deepened to extend into satisfactory geologic materials.

Alternatively, the proposed structure's foundations may be designed based on the findings of a site-specific, design-level geologic and geotechnical investigation(s) approved by the City, including but not limited to the use of proven methods generally accepted by registered engineers to reduce the risk of seismic hazards to a less than significant level, provided such recommendations meet or exceed applicable regulatory requirements, including, but not limited to, the version of the California Building Code, as adopted and amended by the City, in effect at the time of the City's approval of the geotechnical investigation(s); relevant state, County, and City laws, ordinances, and Code requirements; and current standards of practice designed to minimize potential geologic and geotechnical impacts. The Project also shall comply with the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

With implementation of the mitigation measure identified above, impacts would be less than significant. No further analysis of this topic in the EIR is required.

#### **iv. Landslides?**

**No Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and characterized by flat topography with minimally sloping terrain. More specifically, the site grade descends gently to the southeast, with an elevation relief of four feet. In addition, based on the State Seismic Hazards Map, the Project Site is not located in a landslide area, nor is it mapped in the City's landslide inventory.<sup>21,22,23</sup> Project development would not substantially alter the existing topography of the site. Accordingly, there would be no impact with respect to landslides, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

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<sup>21</sup> State of California, California Geological Survey, *Seismic Hazard Zones, Los Angeles Quadrangle*, dated March 25, 1999, [http://gmw.consrv.ca.gov/shmp/download/pdf/ozn\\_la.pdf](http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf), accessed October 14, 2016.

<sup>22</sup> Los Angeles General Plan Safety Element, Exhibit C, *Landslide Inventory & Hillside Areas*, November 1996, p. 51.

<sup>23</sup> City of Los Angeles Department of City Planning, *ZIMAS, Parcel Profile Report*, <http://zimas.lacity.org>, accessed October 14, 2016.

**Less Than Significant Impact.** Project development would require grading, excavation, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, Project construction would comply with the Los Angeles Building Code, which requires necessary permits, plans, plan checks, and inspections to ensure the reduction of sedimentation and erosion effects. In addition, as discussed below under Response to Checklist Question IX.a, the Project would be required to have an erosion control plan approved by the City of Los Angeles Department of Building and Safety (LADBS), as well as a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, Best Management Practices (BMPs) would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. In addition, Project construction contractors would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Compliance with these regulatory requirements, including the implementation of BMPs, would ensure impacts related to soil erosion would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is 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 With Mitigation.** As discussed above, while the Project Site would be subject to ground shaking during a seismic event, it is not considered susceptible to landslides. There are no slopes or free-face earth retaining walls near the Project Site, and, as such, lateral spreading is unlikely. Additionally, Mitigation Measure IS-1, detailed above, would adequately reduce potential impacts related to liquefaction, including lateral spreading and surface manifestation, by ensuring the use of engineered foundation design techniques appropriate for areas potentially subject to liquefaction. Some seismically-induced settlement may be expected as a result of strong ground shaking, but due to the uniform nature of the underlying geologic materials and the long tectonic history and density of the bedrock, excessive dynamic or differential settlements are not expected. Furthermore, according to the Soils and Geology Report, Project construction would not cause or increase the potential for any seismic-related ground failure on-site or adjacent to the Project Site. Similarly, the Project Site is not located within a zone of known subsidence.

However, during Project construction, excavation to a maximum depth of 25 feet could create the potential for temporary unstable slopes. Any required excavations would be properly sloped or shored in accordance with Building Code requirements and the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified. Nevertheless, the following mitigation measure will be implemented to ensure shoring activities do not cause any potential for on- or off-site landslides:

**Mitigation Measure IS-2:** Any proposed vertical excavations shall be stabilized with the aid of a temporary shoring system, which shall be designed by a qualified shoring engineer in accordance with the provisions of the applicable version of the California Building Code and City of Los Angeles Building Code, as well as relevant recommendations provided by the geotechnical engineer. During the Plan Check process, the City of Los Angeles Department of Building and Safety and the geotechnical engineer of record shall review the shoring design to verify it conforms to the applicable building codes and geotechnical recommendations.

The temporary shoring system shall consist of steel soldier piles placed in drilled holes and backfilled with concrete. Depending on the depth of the shoring walls, the soldier piles may be designed as cantilevered, laterally braced utilizing tie-back anchors, or internally braced. Lagging timber boards shall be installed between the soldier piles throughout the entire depth of the shored excavation to prevent caving or raveling of the exposed soils.

Alternatively, shoring systems may be designed based on the findings of a site-specific, design-level geologic and geotechnical investigation(s) approved by the City, including but not limited to the use of proven methods generally accepted by registered engineers to reduce the risk of seismic hazards to a less than significant level, provided such recommendations meet or exceed applicable regulatory requirements, including, but not limited to the version of the California Building Code, as adopted and amended by the City, in effect at the time of the City's approval of the geotechnical investigation(s); relevant state, County, and City laws, ordinances, and Code requirements; and current standards of practice designed to minimize potential geologic and geotechnical impacts. The Project also shall comply with the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

With implementation of the mitigation measure identified above, the Project would not result in any on- or off-site landslide potential. Therefore, impacts related to unstable

soils would be less than significant, and no further analysis of this topic in the EIR is required.

**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 on-site geologic materials include fill materials and alluvial soils to a depth of approximately 15 to 22 feet, which consist of a mixture of sand, silt, and gravel and which were found to be in the very low expansion range. These materials are underlaid by bedrock of the Fernando Formation, which consists of siltstone and claystone and was found to be in the moderate expansion range. With adherence to state and City building requirements, along with the design-level geotechnical report, impacts related to expansive soils would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**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 within a community served by existing sewer infrastructure. The Project's wastewater flows would be accommodated via connections to the existing wastewater system. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems and would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to the use of septic tanks would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

## VII. Greenhouse Gas Emissions

*Would the project:*

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

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

emissions. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts related to 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.** As the Project has the potential to emit GHG emissions, further analysis of this topic in the EIR is required. The analysis will identify Project-related emissions and associated emission reduction strategies to determine whether the Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG (e.g., Assembly Bill 32, Senate Bill 32, City of Los Angeles Green Building Code).

## 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.** The types and amount of hazardous materials potentially used in connection with the Project would be typical of those used for residential, office, and commercial uses. Specifically, operation of the office and commercial uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. The proposed residential uses would involve the limited use of household cleaning solvents and pesticides for landscaping. Project construction also would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Therefore, further analysis of this issue in the EIR is recommended.

**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.** The Project Site was historically developed with a gas station, and a number of underground storage tanks (USTs) were located on-site. The gas station was removed in the early 1980s, prior to current environmental regulations, and there is a lack of information regarding the handling, storage, and disposal practices with respect to its hazardous wastes. In addition, while several former on-site USTs have been removed and received closure notice, construction activities may disturb residual contamination during construction. Moreover, given the long history of the surrounding area and the numerous listings related to USTs, brownfields, and other databases

suggestive of potential environmental concerns, there is a potential for impacts to the Project Site from properties in the surrounding area. As such, further analysis in the EIR is required to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

**Less Than Significant Impact.** There are no school sites located within a 0.25-mile radius of the Project Site. The nearest schools include Ramon C. Cortines School of Visual and Performing Arts (Grand Arts High School), located at 450 North Grand Avenue approximately 0.5 mile to the north, and USC Hybrid High School, located at 350 South Figueroa Street approximately 0.4 mile to the west. As discussed above in Response to Checklist Question VIII.a, Project construction would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, Project operation would involve the limited use of hazardous materials typically used in the maintenance of residential, office, and commercial uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, state, and local regulations. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, impacts related to hazards to nearby schools would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**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.** Specific addresses within the Project Site are listed on the Underground Storage Tank database (CA UST), the Statewide Environmental Evaluation and Planning System database (CA SWEEPS UST), the database of toxics and criteria pollutant emissions data collected by the California Air Resources Board (CA EMI), and on the Historic Cleaner database. In addition, a number of properties in the surrounding area are listed on various environmental databases. Therefore, further evaluation of this issue in an EIR is required.

**e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or**

**public use airport, would the project result in a safety hazard for people residing or working in the project area?**

**No Impact.** The Project Site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. Therefore, no impacts related to airport use would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** The Project Site is not located within 2 miles of a private airstrip. The closest private airstrip is the Los Alamitos Army Airfield, approximately 21 miles southeast of the Project Site. Therefore, no impacts related to safety hazards associated with a private airstrip would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact.** While it is expected that Project construction would be confined on-site, the Project's construction activities may have the potential to cause temporary and intermittent lane closures on adjacent off-site streets (i.e., Broadway, 2nd Street, and/or Spring Street) due to the installation or upgrading of utility infrastructure. However, in the event of lane closure, the remaining travel lanes would be maintained in accordance with standard construction management plans that would ensure adequate circulation and emergency access. Furthermore, none of adjacent streets are designated disaster routes.<sup>24</sup>

Project operation would generate traffic in the Project vicinity but would not result in any changes to site access. The Project would comply with Los Angeles Fire Department (LAFD) access requirements and would not impede emergency access in the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair implementation of any City emergency response plan. Impacts related to emergency response and evacuation plans would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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<sup>24</sup> *Los Angeles General Plan Safety Element, Exhibit H, Critical Facilities and Lifeline Systems, November 1996, p. 61.*

**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 within Fire District No. 1, where additional developmental regulations are established to address fire hazards.<sup>25</sup> Such regulations address roof coverings; the use of certain building materials that have a minimum fire-resistance-rated construction of 1 hour; and other provisions detailed in Los Angeles Building Code. However, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, and there are no wildlands located adjacent to the Project Site.<sup>26</sup> Additionally, the Project's design and construction would comply with all applicable LAFD and Code requirements. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impacts related to wildland fires would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

## **IX. Hydrology and Water Quality**

The following analysis is based, in part, on the *Water Resources Technical Report* (Hydrology Report) prepared by Psomas, dated November 10, 2016, unless otherwise noted. This report is included in Appendix IS-3 of this Initial Study.

*Would the project:*

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

**Less Than Significant Impact.** During Project construction, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into the municipal storm drain system. In addition, on-site watering activities to reduce airborne dust, as well as possible dewatering activities, could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel also could occur. Thus, Project-related construction activities may have the potential to result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the permit requirements, a SWPPP would be developed and implemented during Project

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<sup>25</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org>, accessed October 14, 2016.

<sup>26</sup> *Id.*

construction. The SWPPP would outline BMPs and other erosion control measures to minimize the discharge of pollutants in storm water runoff. The SWPPP would be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook, Part A Construction Activities* and would be carried out in compliance with State Water Resources Control Board (SWRCB) requirements. Additionally, Project construction activities would comply with grading permit regulations (LAMC Chapter IX, Division 70), including the preparation of an erosion control plan to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the SWRCB to comply with the Construction General Permit. Furthermore, erosion control and drainage devices would be provided in accordance with the Construction General Permit and SWPPP, as well as the City's Municipal Separate Storm Sewer System (MS4) Permit. Any dewatering activities during construction would incorporate BMPs targeting sediment-specific pollutants (e.g., sediment treatment, sediment basins, sediment traps, etc.). Based on compliance with these regulatory requirements, impacts to water quality during construction would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

Project operation could introduce stormwater pollutants that are typical of residential and commercial developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular parking and circulation). Specific pollutants of concern identified in the Hydrology Report include sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, bacteria and viruses, oil and grease, and pesticides; of these, sediment, trash, bacteria, and viruses also are pollutants of concern for Los Angeles River Reach 2, to which the Project Site is tributary. Stormwater runoff from precipitation events could potentially carry such urban pollutants into the municipal storm drain system and affect downstream water quality. However, in accordance with the NPDES Municipal Permit, the Project would implement Standard Urban Stormwater Mitigation Plan (SUSMP) requirements during its operational life to reduce the discharge of polluted runoff from the Project Site. The Project also would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and stormwater reuse. To this end, BMPs would be implemented to collect, detain, and treat runoff on-site before discharging into the municipal storm drain system. Specifically, as detailed in the Project's Hydrology Report, a stormwater capture and use system (i.e., harvesting system) is proposed on-site. This system would include a harvesting cistern with a pre-treatment settlement device to filter out trash and debris before water is used to irrigate the landscaped areas of the Project Site. The harvesting cistern capacity would exceed that required for an 85th percentile rainfall event (per LID requirements), thus providing 100 percent treatment. In addition, the proposed change in land use from a surface parking lot to a mixed-use residential and commercial development would result in a reduction in the potential types of pollutants generated on-site. With implementation of

required BMPs, as described in the Project's Hydrology Report, impacts to water quality during operation would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact.** According to the California Geological Survey, the historic high groundwater level beneath the Project Site is approximately 30 feet below the ground surface.<sup>27</sup> Soil borings conducted on-site observed water seepage at depths ranging between 13.5 and 17 feet below ground surface; however, this seepage is assumed to represent a perched condition due to the underlying siltstone bedrock and does not represent the static groundwater table. Project construction would involve excavation to a maximum depth of 25 feet for the proposed subterranean level and foundation elements and is anticipated to encounter water seepage. Accordingly, as discussed in the Soils and Geology Report, temporary dewatering may be implemented to collect and pump any water encountered. As this seepage is not considered part of the groundwater table, Project construction would not deplete groundwater supplies or interfere with groundwater recharge.

Project operation likewise would not interfere with groundwater recharge. The Project Site is currently developed and exhibits approximately 81 percent imperviousness. Following Project implementation, approximately 80 percent of the site would consist of impervious surfaces, with the remainder consisting of natural and landscaped areas. These natural areas would continue to allow infiltration during rainfall events, as under existing conditions. As such, Project construction and operation would not affect groundwater levels beneath the Project Site, nor would they deplete groundwater supplies or result in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, less than significant impacts on groundwater would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**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**

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<sup>27</sup> *Geotechnologies, Inc., Soils and Geology Report to Support the Environmental Impact Report, August 16, 2016 and revised November 3, 2016; see Appendix IS-2 of this Initial Study.*

**manner which would result in substantial erosion or siltation on- or off-site?**

**Less Than Significant Impact.** The Project Site does not include any water courses or rivers. The Project Site is currently developed and exhibits approximately 81 percent imperviousness. The Project Site is relatively flat, descending gently to the southeast with an elevation relief of four feet.<sup>28</sup> Under existing conditions, stormwater runoff from the site sheet flows to the adjacent streets and enters catch basins that connect to the municipal storm drain system.

As discussed above, following Project implementation, approximately 80 percent of the site would consist of impervious surfaces, with the remainder consisting of natural and landscaped areas. These natural areas would continue to allow infiltration during rainfall events, as under existing conditions. Further, permeable pavement would be used in certain hardscape areas to reduce stormwater runoff volumes. Additionally, the site's existing drainage patterns would be maintained. The Project would include the installation of catch basins, planter drains, and roof downspouts throughout the Project Site to collect site and roof runoff and direct stormwater away from the structures through a series of underground storm drain pipes. This on-site stormwater conveyance system would prevent on-site flooding and nuisance water within the Project Site. In addition, as detailed in the Project's Hydrology Report, a proposed stormwater capture and use system (i.e., harvesting system) would be introduced to irrigate the landscaped areas of the Project Site. This system's harvesting cistern would have high flow outlets that route to the same discharge points as under existing conditions. Overall, a net reduction in stormwater flow rates would occur with implementation of LID features, as shown in Table B-1 on page B-29. As such, the Project would not have an adverse effect on the capacity of the municipal storm drain system.

As also previously discussed, the Project would be required to have an erosion control plan approved by LADBS, as well as a SWPPP pursuant to NPDES permit requirements. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. In addition, Project construction contractors would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Based on the above, Project construction and operation would not substantially alter the existing drainage patterns on-site or in surrounding area such that substantial erosion

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<sup>28</sup> *Ibid.*

**Table B-1  
Existing and Proposed Peak Runoff Flows**

<b>Storm Event</b>	<b>Existing Q<sub>Total</sub> (cfs)</b>	<b>Proposed Q<sub>Total</sub><sup>a</sup> (cfs)</b>	<b>Percent Reduction</b>
5-Year	1.13	0.95	16.0%
10-Year	1.50	1.32	12.0%
25-Year	1.98	1.79	9.6%
50-Year	2.42	2.24	7.4%
100-Year	2.84	2.65	6.7%
<hr/> <i>cfs = cubic feet per second</i> <i>Q = Peak Flow</i> <sup>a</sup> <i>Includes reduction from LID implementation (subtracting the 85th Percentile storm flow).</i> <i>Source: Psomas, 2016.</i>			

or siltation would occur. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** See Response to Checklist Question IX.c, above. Based on that discussion, Project construction and operation would not substantially alter the existing drainage patterns on-site or in surrounding area such that substantial on- or off-site flooding would occur. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** See Response to Checklist Questions IX.a and IX.c, above. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**f. Otherwise substantially degrade water quality?**

**Less Than Significant Impact.** See Response to Checklist Question IX.a, above. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** The Project Site is not located within a 100-year or 500-year floodplain as mapped by the Federal Emergency Management Agency (FEMA) or the City of Los Angeles, nor is it located within a potential inundation area as designated in the General Plan Safety Element.<sup>29,30</sup> Thus, the Project would not place housing within a 100-year floodplain. Therefore, no impacts related to flooding would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** See Response to Checklist Question IX.g, above. No impact would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** As discussed above, the Project Site is not located within a designated 100-year floodplain, nor is it located within a flood control basin or a potential inundation area as designated in the General Plan Safety Element.<sup>31</sup> Accordingly, no impacts related to flooding as a result of a levee or dam failure would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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<sup>29</sup> According to FEMA, the Project Site is located in Zone X, Area of Minimal Flood Hazard.

<sup>30</sup> Los Angeles General Plan Safety Element, Exhibit F, 100-Year & 500-Year Flood Plain, p. 57, and Exhibit G, Inundation & Tsunami Hazard Areas, November 1996, p. 59.

<sup>31</sup> Los Angeles General Plan Safety Element, Exhibit F, 100-Year & 500-Year Flood Plain, p. 57, and Exhibit G, Inundation & Tsunami Hazard Areas, November 1996, p. 59.

### 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 undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

There are no water bodies located on-site. The Project Site is approximately 14 miles east of the Pacific Ocean and thus it is not located in an area potentially impacted by a tsunami.<sup>32</sup> In addition, the Project Site is not located downslope from an area of potential mudflow. The nearest enclosed bodies of water are Echo Park Lake, located approximately 1.5 miles to the northwest, and MacArthur Park Lake, located approximately 1.8 miles to the west.<sup>33</sup> Given the distance, no seiche, tsunami, or mudflow events are expected to impact the Project Site. No impacts related to inundation by seiche, tsunami, or mudflow would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

## X. Land Use and Planning

*Would the project:*

### a. Physically divide an established community?

**Less Than Significant Impact.** The Project Site is located in a highly urbanized area. Surrounding uses in the Project vicinity include a mix of commercial office, government and civic office, retail, and residential uses contained in a range of low-rise to high-rise buildings, which are physically separated from the Project Site by modified Avenues (as defined in the City's General Plan Mobility Plan 2035). Immediately to the west is an existing surface parking lot and 10-story office building fronting Broadway. To the immediate north across 2nd Street is Los Angeles Times Square, which includes an 11-story office building and a six-level parking structure fronting 2nd Street. East of the Project Site across Spring Street are single-story commercial buildings and a six-level

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<sup>32</sup> *Ibid.*

<sup>33</sup> *Additionally, the currently drained Silver Lake Reservoir is located approximately three miles northwest of the Project Site; plans are underway to refill it in Spring 2017. It is a concrete-lined, off-stream reservoir, which is not held by a dam. Similarly, a water quality improvement project is underway at the currently drained Elysian Reservoir, located approximately two miles to the northeast; it is anticipated to become operational again in late 2017.*

parking structure. To the south is a surface parking lot and six-story apartment building (Hosfield Building) fronting Broadway, as well as a surface parking lot and five-story apartment building (Douglas Building Lofts) fronting Spring Street. The majority of the Central City community consists of commercial and industrial uses, with smaller pockets of open space and public facilities and an increasing number of multi-family residential buildings.

Currently, the Project Site is being used as a construction staging area for the Metro Regional Connector project. The Project would replace Metro's temporary construction staging area (in a portion of the site previously developed as a surface parking lot) with a 30-story mixed-use building consisting of 107 residential units, approximately 7,200 square feet of ground level commercial floor area, and 534,044 square feet of office uses. The Project Site would contain Metro's 2nd Street/Broadway rail station (below grade) and station portal (at grade) in the northwest corner of the site, both of which are currently under construction but are not a part of the Project.<sup>34</sup> In addition, the existing five-story parking structure located on the southern portion of the Project Site would remain and provide vehicle and long-term bicycle parking for the Project. The proposed uses are consistent with the types of land uses already present or proposed in the surrounding area. As development of the Project would occur entirely within the Project Site boundaries, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**Potentially Significant Impact.** As discussed in Attachment A, Project Description, the Project requests several discretionary approvals, including: a Vesting Zone Change to amend Ordinance No. 180,871 to eliminate or modify [Q] Condition No. 7 (regarding 30-percent minimum and 40-percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32 G and 12.32 Q); Site Plan Review for a project with an increase of 50,000 square feet of

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<sup>34</sup> *The environmental impacts of Metro's Regional Connector Transit Project, including construction and operation of the 2nd Street/Broadway station, were evaluated in the Regional Connector Transit Corridor EIS/EIR (SCH No. 2009031043), certified by Metro in 2012 in conjunction with approval of that project.*

non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05); Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08 E); Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01); and other discretionary and ministerial permits and approvals that may be deemed necessary. Accordingly, further analysis of this topic in the EIR is required to determine the Project's consistency with the LAMC and other applicable land use plans, policies, and regulations.

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

**No Impact.** The Project Site is located in an urbanized area and includes a five-story parking structure and a temporary construction staging area in a portion of the site previously developed as a surface parking lot. The Project Site includes limited ornamental landscaping in the form of a narrow landscaped parkway and several street trees. As such, the Project Site does not support any important habitat or natural communities. Additionally, as noted above in Response to Checklist Question IV.f, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts related to any conservation plans would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

## **XI. Mineral Resources**

*Would the project:*

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

**No Impact.** With respect to aggregate resources (i.e., sand, gravel, and crushed stone), which are used in cement, asphalt, and other building materials, the Project Site is located within the San Fernando Valley Production—Consumption region.<sup>35</sup> However, based on the Project Site's commercial land use and zoning designations, the City has determined there are no plans to utilize the site for long-term mineral extraction. As

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<sup>35</sup> *State of California Department of Conservation, California Geological Survey, Generalized Mineral Land Classification Map of Los Angeles County—South Half, dated 1994, [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR\\_94-14/OFR\\_94-14\\_Plate1B.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf), accessed October 14, 2016.*

previously indicated, the Project Site is located within an urbanized area and has been previously disturbed by development. No mineral extraction operations currently occur on-site. Furthermore, the Project Site is not located within Mineral Resource Zone (MRZ) 2, which designates areas where significant mineral deposits are present or likely, but rather is located within MRZ-3, where mineral deposits may occur but whose significance cannot be evaluated from available data.<sup>36,37</sup> As such, the potential for important mineral resources to occur on-site is low. Additionally, the Project Site is not located within an oil field or oil drilling area, nor are oil wells located on-site.<sup>38,39</sup> Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impacts related to mineral resources would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** See Response to Checklist Question XI.a, above. No impact would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

## XII. Noise

*Would the project result in:*

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

**Potentially Significant Impact.** The Project Site is located within an urbanized area that contains various sources of noise. The predominant noise source in the immediate Project area is associated with traffic along local roadways. Existing on-site

<sup>36</sup> City of Los Angeles, Department of City Planning, *Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure GS-1 (January 19, 1995)*.

<sup>37</sup> State of California Department of Conservation, California Geological Survey, *Generalized Mineral Land Classification Map of Los Angeles County—South Half, dated 1994, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR\_94-14/OFR\_94-14\_Plate1B.pdf, accessed October 14, 2016*.

<sup>38</sup> *Los Angeles General Plan Safety Element, Exhibit E, Oil Field & Oil Drilling Areas, November 1996, p. 55*.

<sup>39</sup> City of Los Angeles Department of City Planning, *ZIMAS, Parcel Profile Report, http://zimas.lacity.org, accessed October 14, 2016*.

noise sources include construction activities associated with Metro's rail station and portal, as well as vehicle noise associated with operation of the on-site parking structure. During Project construction, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. Additionally, the Project's commercial and residential uses would generate noise from the operation of mechanical equipment, the loading area, and use of the ground level paseo and various amenity decks and terraces. Further, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways, which may result in the exposure of persons to or generation of noise in level in excess of established standards. Therefore, further analysis of this topic in the EIR is required to determine the Project's noise impacts during construction and operation.

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

**Potentially Significant Impact.** Project construction could generate groundborne noise and vibration in association with demolition, site grading and clearing activities, the installation of building footings, and construction truck travel. As such, the Project has the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further analysis of this topic in the EIR is required to determine the Project's groundborne vibration and noise levels.

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

**Potentially Significant Impact.** As discussed above in Response to Checklist Question XII.a, Project-related traffic and operation of the residential and commercial uses have the potential to increase ambient noise levels above existing levels. Therefore, further analysis of this topic in the EIR is required.

**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 above in Response to Checklist Questions XII.a and XII.b, Project construction activities have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further analysis of this topic in the EIR is required to determine the Project's noise impacts.

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

**No Impact.** The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. Therefore, no impacts related to airport noise would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip. There are no private airstrips within the Central City community. The closest private airstrip is the Los Alamitos Army Airfield, which is approximately 21 miles southeast of the Project Site. Therefore, no noise impacts related to a private airstrip would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

### **XIII. Population and Housing**

*Would the project:*

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

**Potentially Significant Impact.** The Project involves the construction of 107 new residential units. As such, the Project would increase the residential population in the Central City community. Additionally, the Project would generate permanent office and commercial jobs on-site, as well as temporary construction-related jobs. Therefore, further analysis in an EIR is required to determine the Project's impacts with respect to population, housing, and employment growth.

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

**No Impact.** As no housing currently exists on the Project Site, the Project would not displace any existing housing. Therefore, no impacts related to housing displacement would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. Therefore, no impacts related to population displacement would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

## **XIV. Public Services**

*Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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.** As discussed above, the Project would increase both the residential and daytime populations in the Central City community through the construction of new residential, office, and commercial uses. Thus, the Project has the potential to result in an increased demand for fire protection services. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on fire protection services provided by LAFD.

**b. Police protection?**

**Potentially Significant Impact.** The residential population generated by the Project may result in an increased demand for police protection services provided by the Los Angeles Police Department (LAPD). Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on police protection services provided by LAPD.

**c. Schools?**

**Potentially Significant Impact.** The residential population generated by the Project may result in an increased demand for Los Angeles Unified School District (LAUSD) school facilities. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on school services and facilities provided by LAUSD.

#### d. Parks?

**Potentially Significant Impact.** The residential population generated by the Project may result in additional demand for parks and recreational services provided by the Los Angeles Department of Recreation and Parks (LADRP). Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on parks and recreational facilities provided by LADRP.

#### e. Other governmental services (including roads)?

**Potentially Significant Impact.** The residential population generated by the Project may result in additional demand for library services provided by the Los Angeles Public Library (LAPL). Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on library services provided by LAPL.

With respect to roadway maintenance, the Project would not generate substantial truck traffic or unusual circumstances necessitating maintenance beyond regularly scheduled services. No other public services would be notably impacted by the Project. Therefore, the Project would have less than significant impacts on other governmental services, including roadways, and no mitigation measures would be required. No further analysis of other governmental services in the EIR is 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 above in Response Checklist Question XIV.d, the new residential population associated with the Project could result in an increased demand for public parks and recreational facilities that serve the Project Site. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on parks and recreational facilities provided by LADRP.

#### 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 includes several amenity decks offering a variety of social and community spaces, including landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a

lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of useable common open space and 800 square feet of useable private open space would be provided for Project residents. The potential environmental impacts associated with construction of these facilities are analyzed throughout this Initial Study and will be further analyzed in the EIR for those topics where impacts could be potentially significant as part of the overall Project.

## XVI. Transportation/Circulation

*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 has the potential to result in an increase in daily and peak hour traffic within the Project vicinity. In addition, Project construction has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees, and visitors would generate daily vehicle, pedestrian, bicycle, and public transit trips. The resulting increase in the use of the area's transportation facilities could exceed roadway and transit system capacities. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on the roadway and transit system. In addition, Project compliance with the City's General Plan Mobility Plan 2035 standards will be discussed further in the EIR. Furthermore, although not required under CEQA, the EIR will include an analysis of the adequacy of on-site parking.

- 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.** Metro administers the Congestion Management Program (CMP), a state-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any

Project that could add 50 or more trips to any CMP intersection or 150 or more trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Project implementation has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on CMP facilities.

**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 previously discussed, the Project Site is not located in the vicinity of any public or private airport or planning boundary of any airport land use plan. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. However, the proposed mixed-use building would extend more than 200 feet above existing grade. In accordance with Code of Federal Regulations Title 14, Section 77.13, the Applicant would be required to submit copies of Federal Aviation Administration (FAA) Form 7460-1 to the FAA Obstruction Evaluation Service (OES). The OES would then evaluate the Project, and any OES recommendations would be incorporated into the building's design, including protocols pertaining to building markings and lighting. Implementation of required design features and lighting would ensure that impacts associated with air traffic safety would be less than significant. No mitigation measures or further analysis of this topic in an EIR is required.

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

**No Impact.** The roadways adjacent to the Project Site are part of the local roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses, as the proposed uses are consistent with other commercial and residential uses in the Project vicinity. Thus, no impacts related to increased hazards due to a design feature or incompatible use would occur, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**e. Result in inadequate emergency access?**

**Potentially Significant Impact.** While it is expected that Project construction would be confined on-site, the Project's construction activities may have the potential to cause temporary and intermittent lane closures on adjacent off-site streets (i.e., Broadway, 2nd Street, and/or Spring Street) due to the installation or upgrading of utility infrastructure.

The Project also would generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and nearby freeways. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on emergency access.

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

**Potentially Significant Impact.** There are multiple public transportation opportunities in the immediate Project vicinity. The Project Site is located approximately 700 feet from the Civic Center/Grand Park Metro Purple and Red Line station (located at the southwest corner of 1st Street and Hill Street), and, as previously mentioned, a Metro Regional Connector portal and station are currently under construction on-site. The site is also served by Metro Bus Lines 2, 4, 30, 33, 35, 40, 45, 68, 83, 84, 92, 302, 330, 728, 733, 745, and Los Angeles Department of Transportation (LADOT) Dash Line D. Additionally, the Project would include short-term and long-term bicycle parking, as required. As Project operation has the potential to increase the demand for alternative transportation, further analysis in the EIR is required to determine the Project's potential to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities.

## **XVII. Tribal Cultural Resources**

*Would the project:*

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

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

**Potentially Significant Impact.** Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in the bill, lead agencies must

provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As previously discussed, the Project would require grading, excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2ndStreet/Broadway rail station and portal, and other construction activities that could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the Project Applicant will participate in requested consultations. Further analysis of this topic in the EIR is required to determine the Project's potential impacts to tribal cultural resources.

- ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Potentially Significant Impact.** See Response to Checklist Question XVII.a.i, above. This issue will be evaluated further in the EIR.

## XVIII. Utilities

*Would the project:*

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

**Potentially Significant Impact.** The Los Angeles Regional Water Quality Control Board's (LARWQCB) Water Quality Control Plan for the Los Angeles Region (Basin Plan) establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.<sup>40</sup> Wastewater reclamation and treatment in the City

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<sup>40</sup> *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4) (adopted June 1994, amended December 2010).*

is provided by the LADPW Bureau of Sanitation, which operates two treatment plants and two water reclamation plants in accordance with LARWQCB treatment requirements and/or the Basin Plan's water reclamation requirements. The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which is designed to provide secondary treatment for 450 million gallons per day (mgd), with annual increases in wastewater flows limited to 5 mgd by City Ordinance No. 166,060. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB's discharge policies for Santa Monica Bay.

These proposed uses are anticipated to increase wastewater generation on-site, which would result in an increased demand for wastewater treatment facilities. Therefore, further analysis of this issue in an EIR is required to determine whether Project development would cause the HTP's wastewater treatment requirements to be exceeded.

**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.** Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Project development would result in increased water demand and wastewater generation on-site and may necessitate upgrades to water and wastewater conveyance systems. As such, further analysis of this issue in an EIR is required to determine whether adequate capacity is available to accommodate the domestic water demand, required fire flows, and wastewater flows generated by the Project.

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

**Less Than Significant Impact.** As discussed in Response to Checklist Question IX.c, stormwater flows from the Project Site would not increase with implementation of the Project. As discussed above in Response to Checklist Question IX.a, the Project would be required to comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. To this end, BMPs would be implemented to collect, retain, and treat runoff on-site before discharging into the municipal storm drain system, and as a result, stormwater flows from the site would be reduced as compared to existing conditions. Accordingly, the Project would not require the construction of new off-site stormwater drainage facilities or

expansion of existing facilities. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**Potentially Significant Impact.** The Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site. As previously discussed, Project development would result in increased water demand. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on the water supply.

**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.** See Response to Checklist Question XVIII.a, above. This issue will be evaluated further in the EIR.

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

**Potentially Significant Impact.** Solid waste generated by the Project would result in an increased demand for landfill capacity compared to existing conditions. More specifically, the Project's proposed residential and commercial uses would generate solid waste on an ongoing basis, and construction activities would generate one-time construction waste that would need to be disposed. As such, further analysis of this topic in the EIR is recommended.

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

**Less Than Significant Impact.** It is expected that Project development would comply with federal, state, and local statutes and regulations related to solid waste. Resulting impacts would likely be less than significant. Nonetheless, because the EIR will study the Project's solid waste disposal needs, the EIR also will include an evaluation of the Project's compliance with statutes and regulations related to solid waste.

#### **h. Other utilities and service systems?**

**Potentially Significant Impact.** The Project would generate an increased demand for electricity and natural gas. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts related to energy use.

### **XIX. Mandatory Findings of Significance**

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

**Potentially Significant Impact.** Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to the following issues: Air Quality; Cultural Resources (Historic, Archeological, Paleontological and Tribal Cultural Resources); Greenhouse Gas Emissions/Sustainability; Hazards and Hazardous Materials; Land Use and Planning; Noise; Population, Housing, and Employment; Public Services (Fire Protection, Police Protection, Schools, Parks and Recreation, and Libraries); Transportation/Circulation; and Utilities (Water Supply, Wastewater, Solid Waste, and Energy). As such, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts, and feasible mitigation measures will be recommended to reduce any identified significant impacts. As discussed above in the Responses to Checklist Questions IV.a through f, 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, or reduce the number or restrict the range of a rare or endangered plant or animal.

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

**Potentially Significant Impact.** The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other development projects to result in impacts that are greater than the impacts of the Project alone. Located within the Project vicinity are other current and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to

potential cumulative impacts. Project impacts on both an individual and cumulative basis will be addressed in the EIR for the following issues: Aesthetics (Aesthetics, Views, Light/Glare, and Shading); Air Quality; Cultural Resources (Historic, Archeological, Paleontological and Tribal Cultural Resources); Greenhouse Gas Emissions/Sustainability; Hazards and Hazardous Materials; Land Use and Planning; Noise; Population, Housing, and Employment; Public Services (Police Protection, Fire Protection, Schools, Parks and Recreation, and Libraries); Transportation/Circulation; and Utilities (Water Supply, Wastewater, Solid Waste, and Energy).

With respect to cumulative effects related to agricultural and forest resources and mineral resources, the Project would have no impact to these resources and, therefore, would not combine with other projects to result in cumulative impacts. With regard to biological resources, geology and soils, hydrology and water quality, and solid waste, the Project would not combine with related projects or other cumulative growth to result in significant cumulative impacts, as discussed further below.

As it relates specifically to biological resources, the Project Site is located in an urbanized area and, similar to the Project, other developments occurring in the Project vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the street parkway. Like the Project, related projects involving tree removals would be required to comply with the MBTA, which regulates vegetation removal during the nesting season to ensure significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative effect.

Due to the site-specific nature of geological conditions (e.g., soils, geological features, seismic features, etc), geology impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. None of the Project Site's physical characteristics are unique or more likely to involve or induce geologic or geotechnical impacts than other physical features throughout the surrounding area. Nonetheless, cumulative growth would cumulatively expose a greater number people to seismic hazards. However, like the Project Applicant, the proponents of related projects and all other future development projects in the area would be required to comply with applicable local, regional, state, and federal regulations pertaining to geology and soils, including the California and Los Angeles Building Codes. As these regulatory requirements are intended to minimize risks associated with seismic and geotechnical hazards, with compliance, cumulative impacts with respect to geology and soils would be less than significant.

With respect to hydrology and water quality, related projects would be required to conduct site-specific technical analysis and mitigation, as necessary, in addition to compliance with regulatory requirements and the City's standard mitigation practices during

construction. Similar to the Project, related projects that disturb more than one acre of soil would be required to obtain coverage under the NPDES Construction General Permit (Order No. 99-08-DWQ) and implement a SWPPP pursuant to NPDES requirements. Additionally, SUSMP requirements would be met during the operational life of relevant developments to reduce the discharge of polluted runoff, in addition to compliance with the City's LID Ordinance. Furthermore, as previously discussed, as a result of LID compliance stormwater flows from the Project Site would be reduced as compared to existing conditions, and water quality would not be degraded. Accordingly, the Project would not contribute to cumulative impacts related to hydrology and water quality.

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

**Potentially Significant Impact.** As indicated by the analysis above, the Project could result in potentially significant impacts with regard to the following issues: Air Quality; Cultural Resources (Historic, Archeological, Paleontological and Tribal Cultural Resources); Greenhouse Gas Emissions/Sustainability; Hazards and Hazardous Materials; Land Use and Planning; Noise; Population, Housing, and Employment; Public Services (Police Protection, Fire Protection, Schools, Parks and Recreation, and Libraries); Transportation/Circulation; and Utilities (Water Supply, Wastewater, Solid Waste, and Energy). As a result, these potential effects will be analyzed further in the EIR.