City of Los Angeles

Department of City Planning •Major Projects/EIR Analysis Section

6262 Van Nuys Boulevard, Room 351, Van Nuys, Ca 91401

INITIAL STUDY

6th and Harvard

Case Number: ***ENV-2016-4470-EIR***

Project Address: *3751 W. 6th Street; 547–551 S. Harvard Boulevard, Los Angeles, CA 90020-5103*

Community Plan: *Wilshire Community Plan Area*

Council District: *10—Herb J. Wesson, Jr.*

Project Description: *The Project proposes the demolition of an existing 16,854-square-foot commercial building currently used as the United States Post Office—Dosan Ahn Chang Ho Station and surface parking lot; and the construction of a 10-story, approximately 130-foot-tall mixed-use building consisting of residential uses comprising 44 residential apartment units, up to 200 hotel rooms, approximately 18,000 square feet of commercial (retail and restaurant) uses, and three subterranean levels of parking on a 0.794-acre site. The Project's approximately 175,000 square feet of building area would result in a floor area ratio (FAR) of approximately 5.2:1. On-site parking would provide, at a minimum, the required 205 vehicular parking spaces and 250 bicycle parking spaces. The Project proposes a minimum of approximately 17,721 square feet of on-site common and private open space, including residential amenities.*

The Project Applicant is requesting ministerial and discretionary approvals as part of the Project, including, without limitation, (1) General Plan Amendment from High Medium Residential and Neighborhood Office Commercial to Regional Center Commercial, pursuant to LAMC Section 11.5.6; (2) Vesting Zone/Height District Change from R4-2 and C2-1 to C2-2, pursuant to LAMC 12.32 to allow for a maximum FAR of 5.1:1; (3) A Conditional Use Permit for a hotel use within 500 feet of an R zone pursuant to LAMC 12.24.W.24; (4) A Conditional Use Permit for the sale and dispensing of alcoholic beverages In the hotel and /or restaurant use pursuant to LAMC Section 12.24 W.1; (5) Site Plan Review for a development project that creates or results in an increase of 50,000 square feet or more of non-residential floor area or 50 or more dwelling units or guest rooms; (6) Vesting Tentative Tract Map for air lots for the separate retail, office, and hotel uses pursuant to LAMC Section 17.15; (7) A Development Agreement to provide for community benefits (Government Code 65864-65869.5); (8) grading, excavation, and building permits; and (9) other permits, ministerial or discretionary, that may be necessary to execute and implement the Project.

APPLICANT:	***PREPARED BY:***	***ON BEHALF OF:***
Urban Commons	*EcoTierra Consulting, Inc.*	*The City of Los Angeles* *Department of City Planning* *Major Projects/EIR Analysis Section*

July 2017

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I. INTRODUCTION

The subject of this Initial Study is the proposed W 6th and S. Harvard Project (the "Project"), a mixed-use project on a 0.794-acre site in the Wilshire community at the northwest corner of W.6th Street and Harvard Boulevard (the "Project Site") in the City of Los Angeles ("City").

The Project would involve the demolition of an existing 16,854-square-foot building, currently used as the United States Post Office—Dosan Ahn Chang Ho Station and surface parking lot; and the construction of a 10-story, approximately 101-foot-tall building consisting of approximately 44 residential units, up to 200 hotel rooms with approximately 18,000 square feet of commercial uses, and three levels of subterranean parking.

The Project Site is located within the Wilshire Community Plan Area of the City, Wilshire Center/ Koreatown Redevelopment Project Area, in a Los Angeles State Enterprise Zone (East Los Angeles Enterprise Zone) and within a Transit Priority Area (TPA) due to its proximity to two Metro stations – Wilshire and Western Station and Wilshire and Normandie Station, as well as major bus lines and meets the criteria of infill project. The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

1. PROJECT INFORMATION

Project Title: 6th and Harvard

Project Applicant: Urban Commons
777 South Figueroa Street, Suite 2850
Los Angeles, CA 90017

Project Location: 3751 W. 6th Street and 547–551 Harvard Boulevard
Los Angeles, CA 90020-5103

Lead Agency: City of Los Angeles Department of City Planning
6262 Van Nuys Boulevard, Room 351
Van Nuys, CA 91401

2. PURPOSE AND ORGANIZATION OF THE INITIAL STUDY

An Initial Study is a preliminary analysis prepared by and for the City of Los Angeles as Lead Agency to determine whether an Environmental Impact Report or a Negative Declaration or Mitigated Negative Declaration must be prepared for a proposed project.

State CEQA Guidelines Section 15063 states:

(a) The Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.

(2) The lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.

(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plan described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs; and

(7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.

(4) A discussion of the ways to mitigate the significant effects identified, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and

(6) The name of the person or persons who prepared or participated in the Initial Study.

(e) Submission of Data. If the project is to be carried out by a private person or private organization, the Lead Agency may require such person or organization to submit data and information which will enable the Lead Agency to prepare the Initial Study. Any person may submit any information in any form to assist a Lead Agency in preparing an Initial Study.

(f) Format. Sample forms for an applicant's project description and a review form for use by the lead agency are contained in Appendices G and H. When used together, these forms would meet the requirements for an initial study, provided that the entries on the checklist are briefly explained pursuant to subsection (d)(3). These forms are only suggested, and public agencies are free to devise their own format for an initial study. A previously prepared EIR may also be used as the initial study for a later project.

(g) Consultation. As soon as a Lead Agency has determined that an Initial Study will be required for the project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain the recommendations of those agencies as to whether an EIR or a Negative Declaration should be prepared. During or immediately after preparation of an Initial Study for a private project, the Lead Agency may consult with the applicant to determine if the applicant is willing to modify the project to reduce or avoid the significant effects identified in the Initial Study.

As shown in the following environmental analysis contained in this Initial Study, the implementation of the Project could cause potentially significant impacts on the environment. Consequently, this Initial Study concludes that an EIR shall be prepared for the proposed Project.

3. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into six sections:

Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the designated Lead Agency for the proposed Project.

Project Description: This section provides a detailed description of the proposed Project, including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.

Initial Study Checklist: This section contains the completed Initial Study Checklist showing the significance level under each environmental impact category.

Environmental Impact Analysis: This section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist.

Preparers of the Initial Study and Persons Consulted: This section provides a list of consultant team members and governmental agencies that participated in the preparation of the Initial Study.

Acronyms & Abbreviations: This section includes a list of acronyms and abbreviations used in the Initial Study.

II. PROJECT DESCRIPTION

1. ENVIRONMENTAL SETTING

A. Project Location

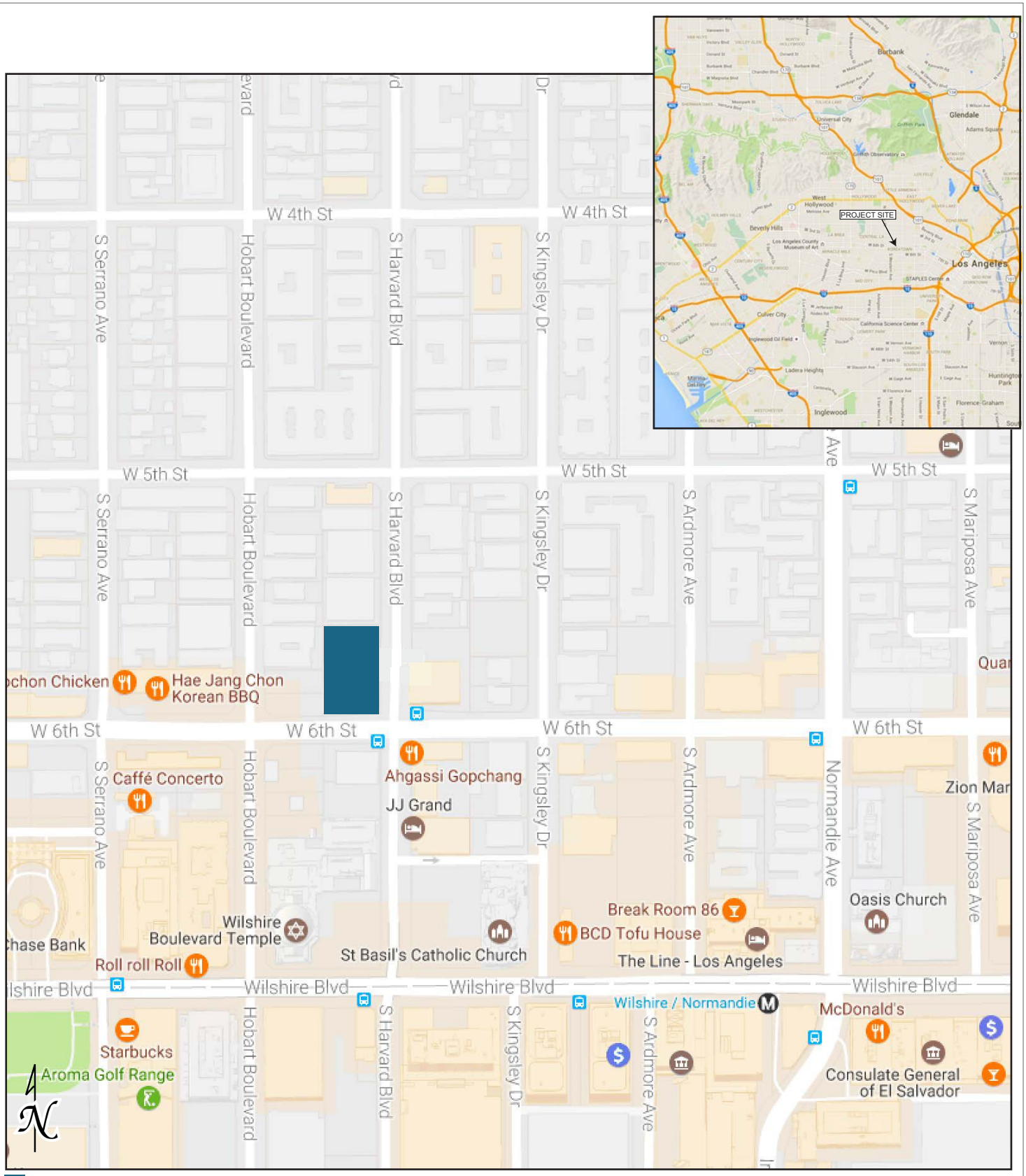
The Project Site is located at 3751 W. 6th Street and 547-551 S. Harvard Boulevard in the Wilshire community of the City of Los Angeles (the "City"). The relatively flat, 0.794-acre, Project Site is bounded by W. 6th Street to the south, S. Harvard Boulevard to the east, multi-family residential uses to the north, and vacant lot to the west (see Figure II-1, Vicinity and Regional Map). The Project Site consists of four adjoining parcels associated with Assessor's Parcel Number 5503-022-001. The Project Site is developed as a 16,854-square-foot building, currently used as the United States Post Office—Dosan Ahn Chang Ho Station, and a gated surface parking lot. No plantings or trees occur on-site, but there are five existing palm (*Washingtonia robusta*) street trees along S. Harvard Boulevard.

Regional access to the Project Site is provided via the Hollywood Freeway (US Route 101), Santa Monica Freeway (Interstate 10 [I-10]), and Pasadena/Harbor Freeway (Interstate 110 [I-110]). The nearest northbound and southbound freeway access to Hollywood Freeway is via Vermont Avenue approximately 1.2 miles to the northeast from the Project Site. The nearest northbound and southbound freeway access to Santa Monica Freeway is via Western Avenue approximately 1.8 miles to the southwest from the Project Site, providing access to the Pasadena/Harbor Freeway. Local access to the Project Site is provided via W. 6th Street and S. Harvard Boulevard. The Los Angeles County Metropolitan Transportation Authority ("Metro") provides local bus service in the Project Site area: along W. 6th Street, local line Metro 18; along Wilshire Boulevard, local line Metro 20, and Metro Rapid 720; along Normandie Avenue, local line Metro 206; along Western Avenue, local line Metro 207 and Metro Rapid 757; and along 3rd Street, local lines Metro 16, Metro 17, and Metro 316. In addition, Foothill Transit operates line 481 along Wilshire Boulevard. The City of Los Angeles Department of Transportation (LADOT) also serves the Project Site area with its DASH bus service, including the Wilshire Center/Koreatown route and Hollywood/Wilshire route. Additionally, the Wilshire/Western Metro Purple Line Station (subway) is located approximately 0.26 mile to the southwest of the Project Site.

B. Description of Surrounding Areas

The Project Site is located in the urbanized and densely populated Wilshire community. The community is characterized by a mix of uses, including residential and commercial uses at varying levels of intensity, and the nearby structures vary widely in building style and period of construction. The Project Site is immediately surrounded by multi-family residential buildings to the north, a vacant lot to the west, W. 6th Street to the south, and S. Harvard Boulevard to the east. W.6th Street is classified by the City's Mobility Plan 2035 as an Avenue II roadway, and S. Harvard Boulevard is classified as a Collector roadway.

Immediately to the west of the Project Site is a vacant, undeveloped lot. To the west of the vacant lot is Hobart Boulevard, which is lined by a single-story commercial/retail building to the west of Hobart Boulevard and surface parking fronting W.6th Street with four-story multi-family residential behind to the north. Immediately to the north of the Project Site is a four-story multi-family residential building



Source: Google Earth, December 2016.

EcoTierra consulting

Figure II-1
Vicinity and Regional Map

with other two- to four-story multi-family residential buildings along S. Harvard Boulevard. To the east of the Project Site across S. Harvard Boulevard on W. 6th Street is a six-story commercial/office building followed by a two-story structure converted from residential to commercial use with a surface parking lot. To the south is a five-story commercial/parking structure (with ground floor commercial office and four-levels of parking above). To the southeast is single-story commercial retail building, and to the southwest is single-story commercial automotive related use. The Project Site is located in the vicinity of a notable landmark, Wilshire Boulevard Temple, which is situated approximately one block to the south.

C. Existing Site Zoning/Land Use Designation

The Project Site is located on two separate zones—one residential and the second commercial. The southern two lots are zoned C2-1 (Height District 1) and have a Neighborhood Office Commercial General Plan land use designation. The northern two lots are zoned R4-2 (Height District 2) and have a High Medium Residential General Plan land use designation (refer to Figure II-2, Existing and Proposed Zoning). The Project Site is within the Wilshire Center/Koreatown Redevelopment Project Area, a Los Angeles State Enterprise Zone (East Los Angeles Enterprise Zone) and within a Transit Priority Area (TPA) due to its proximity to two Metro stations—Wilshire and Western Station and Wilshire and Normandie Station, as well as major bus lines and meets criteria of infill project.

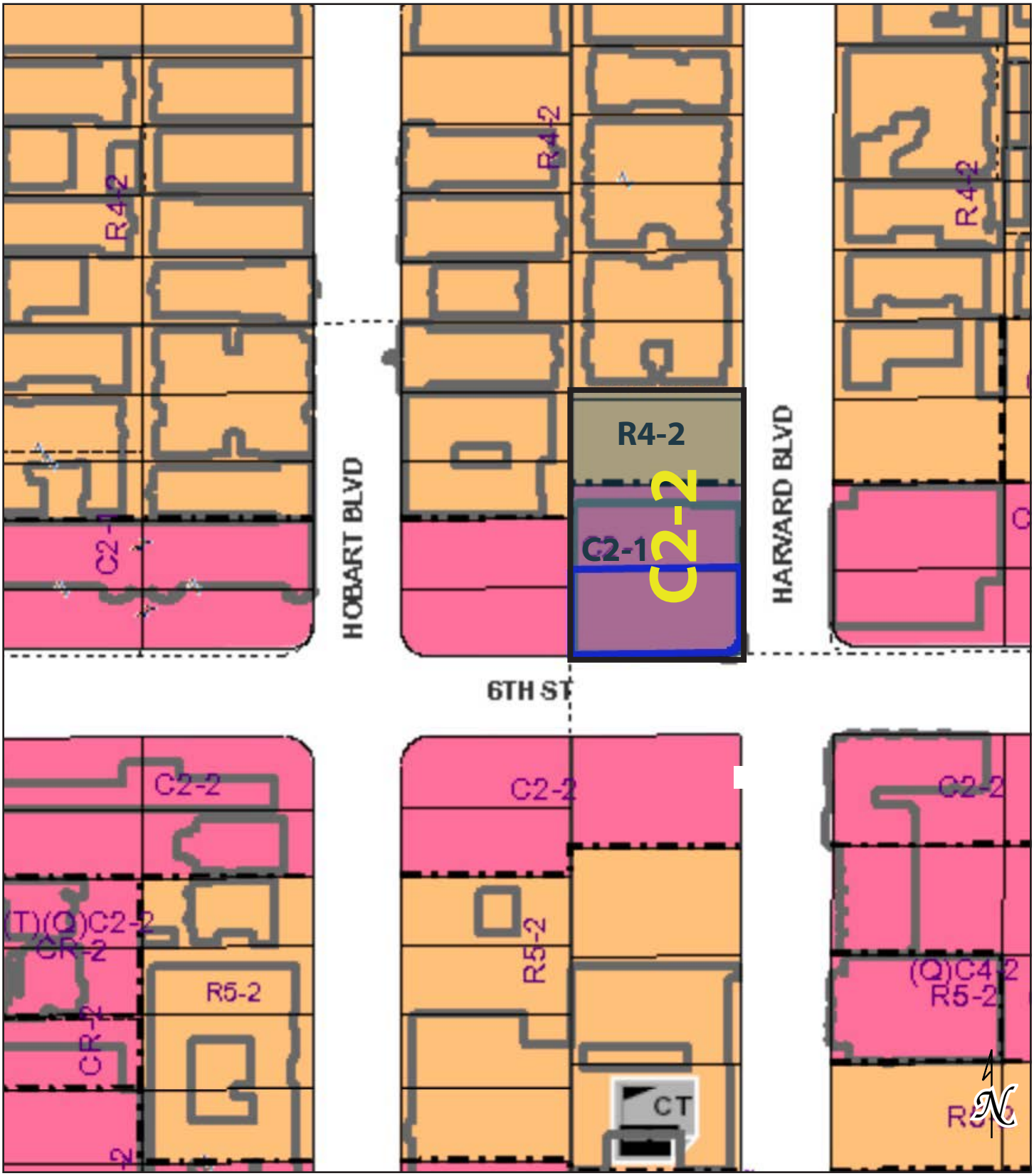
2. PROJECT CHARACTERISTICS

A. Project Overview

The Project would demolish the existing 16,854-square-foot commercial building and surface parking lot on the Project Site in order to construct a new 10-story mixed-use hotel, residential and commercial development.

The proposed uses are summarized in Table II-1, Project Development Summary. A conceptual site plan is illustrated in Figure II-3, Conceptual Site Plan; a conceptual rendering of the Project is shown in Figure II-4, Project Rendering; location of project uses are shown in building sections, Figure II-5, Building Section; and project elevations Figure II-6, Elevation A—North and South and Figure II-7, Elevation B—East and West. As described in more detail below and shown in Table II-1, the Project would provide up to 44 residential units, 200 hotel guest rooms, approximately 18,000 square feet of commercial retail and restaurant uses, and a minimum of 205 vehicle parking spaces.

As shown in Figure II-5, the proposed uses, totaling 175,000 square feet, would be located within a 10-story building with subterranean parking below. The maximum height of the building would not exceed 130 feet. The Project provides a U-shaped building with an open center facing east towards S. Harvard Boulevard. The ground floor of the building would include commercial retail, and separate hotel and residential lobbies. The retail uses would be accessible from both W.6th Street and S. Harvard Boulevard. The second level includes hotel amenities, café, back of house, and five residential units. In addition, the second level includes an approximately 1,456-square-foot deck fronting primarily W. 6th Street and is accessible from the hotel amenities. Adjacent to the second level is an approximately 7,055-square-foot landscaped open courtyard with outdoor seating (see Figure II-9, Level 2 Floor Plan). Levels 3 through 5 include the remaining 39 residential units (see Figure II-10, Levels 3 to 5 Floor Plan).



LEGEND

Existing Zoning: C2-1 and R4-2

Proposed Zoning: C2-2

Project Site

Source: City of Los Angeles Planning Zimas Maps, May 2017.

EcoTierra consulting

Figure II-2
Existing and Proposed Zoning

Source: Danielian Associates, November 2016.

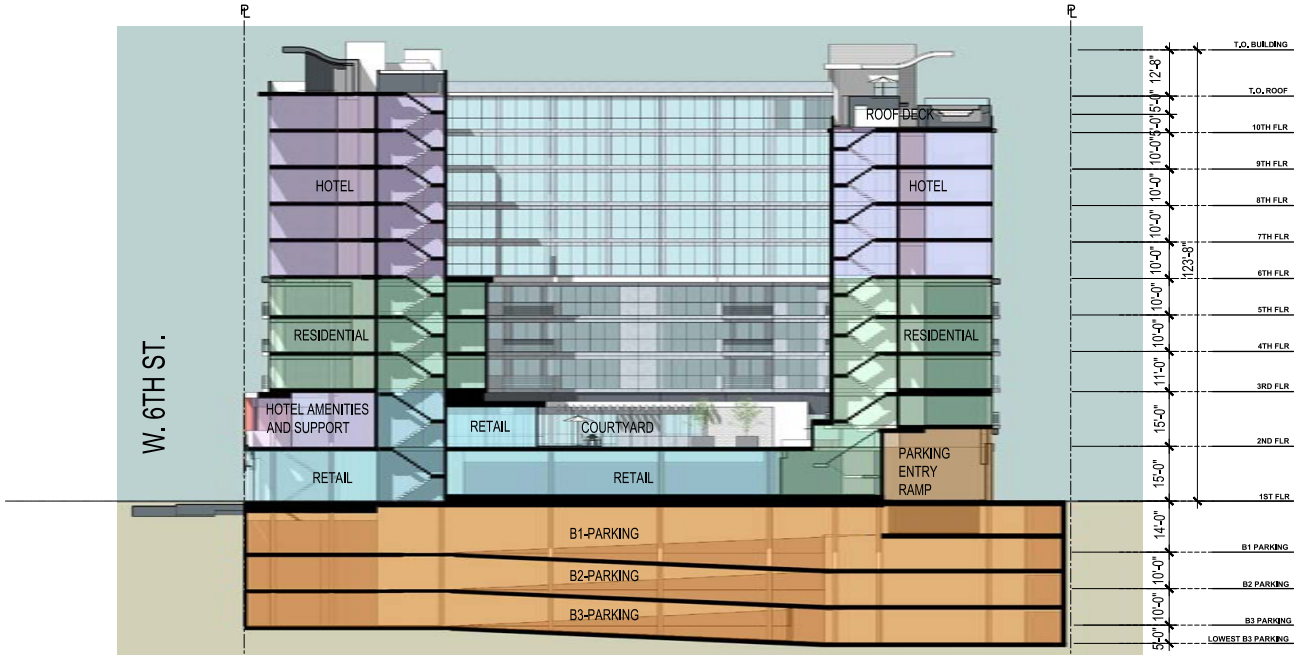
EcoTierra consulting

Figure II-3
Conceptual Site Plan

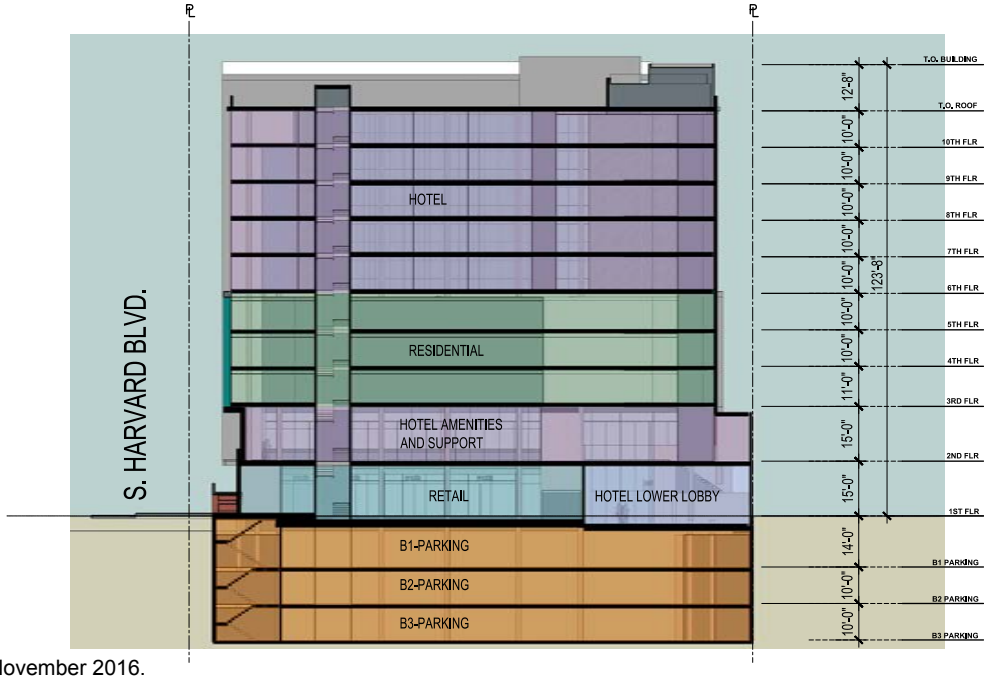
Source: Danielian Associates, November 2016.

EcoTierra consulting

Figure II-4
Project Rendering



2 SECTION B

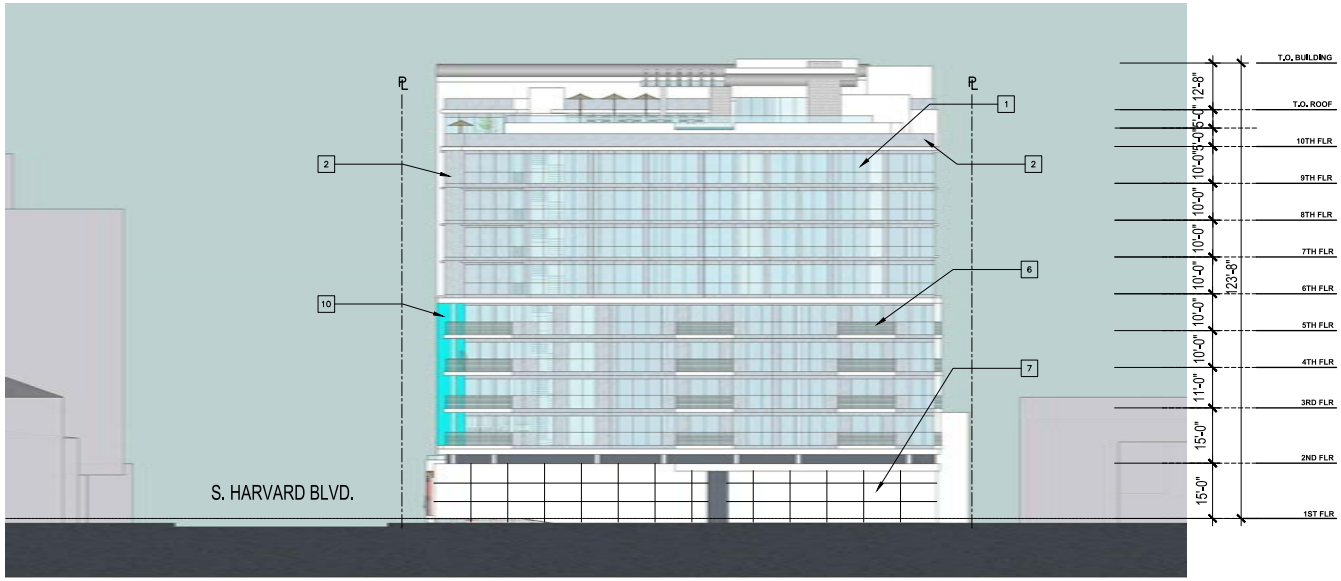


1 SECTION A

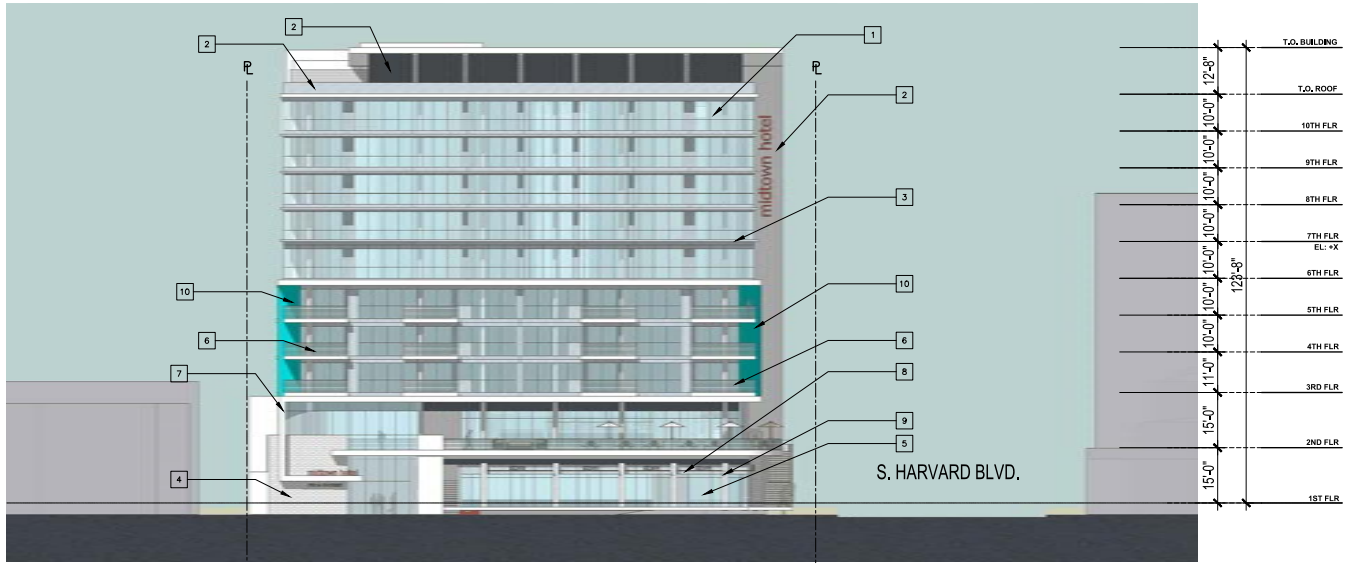
Source: Danielian Associates, November 2016.

EcoTierra consulting

Figure II-5
Building Sections



1 NORTH ELEVATION



2 SOUTH ELEVATION

Source: Danielian Associates, November 2016.

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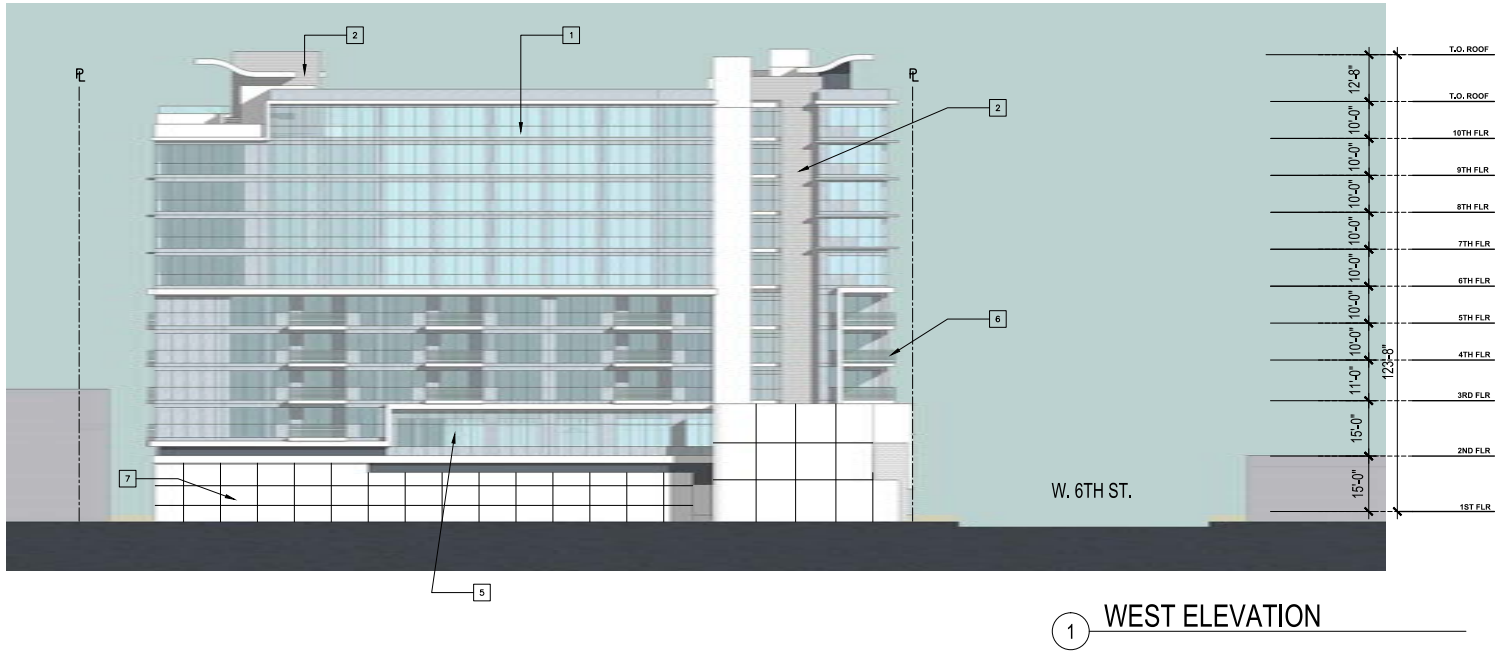
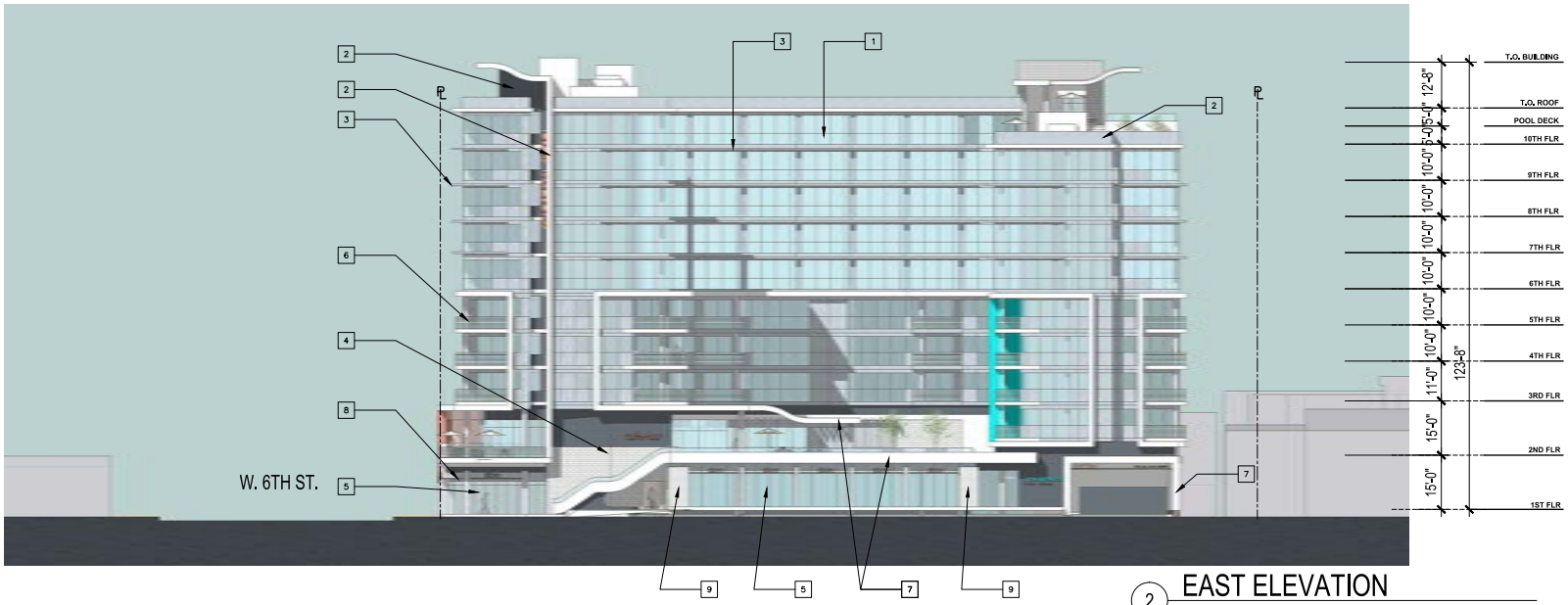
Figure II-6
Building North and South Elevations



1 WEST ELEVATION

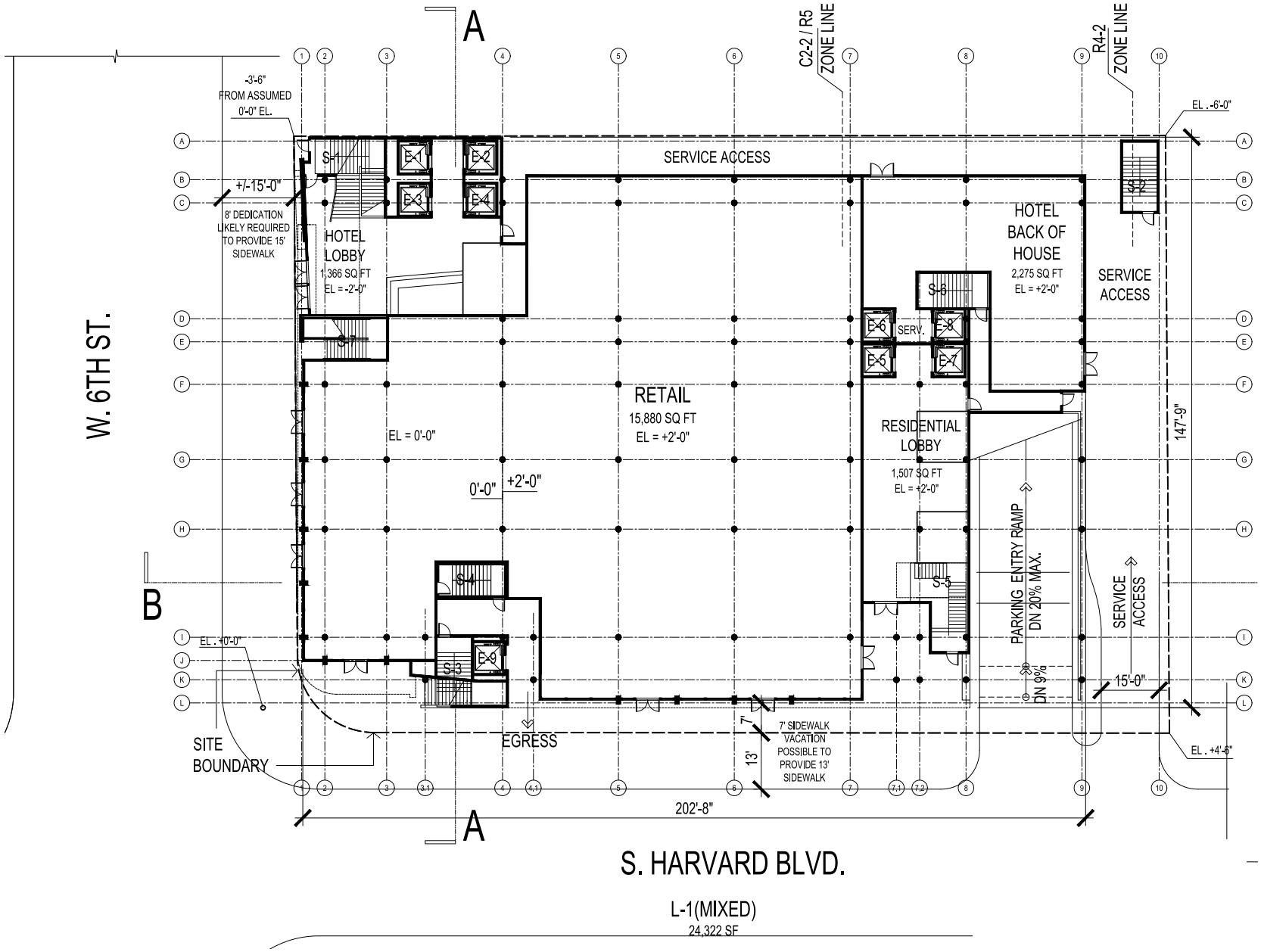


2 EAST ELEVATION

Source: Danielian Associates, November 2016.

EcoTierra consulting

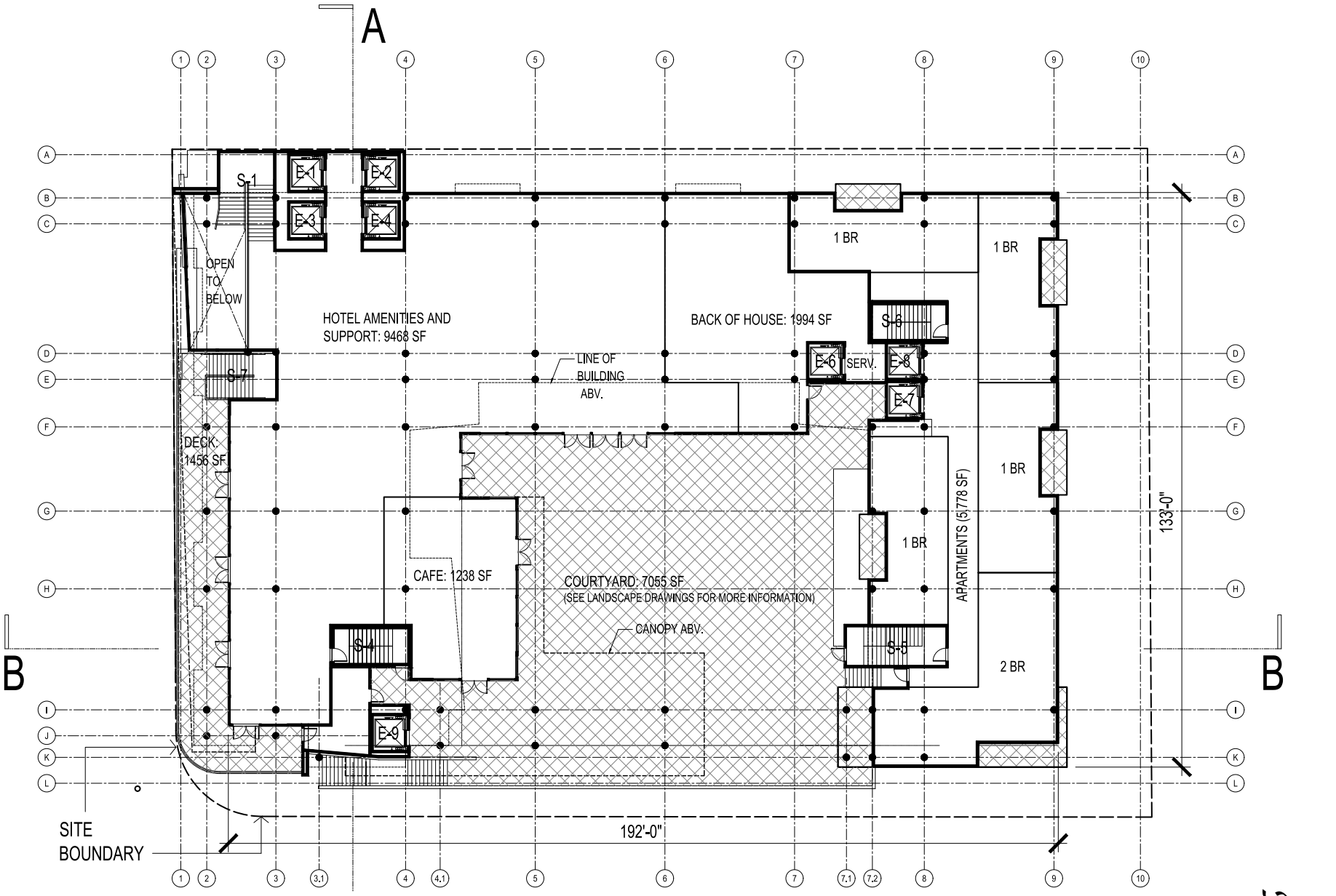
Figure II-7
Building East and West Elevations



Source: Danielian Associates Architecture and Planning, January 2017.

EcoTierra consulting

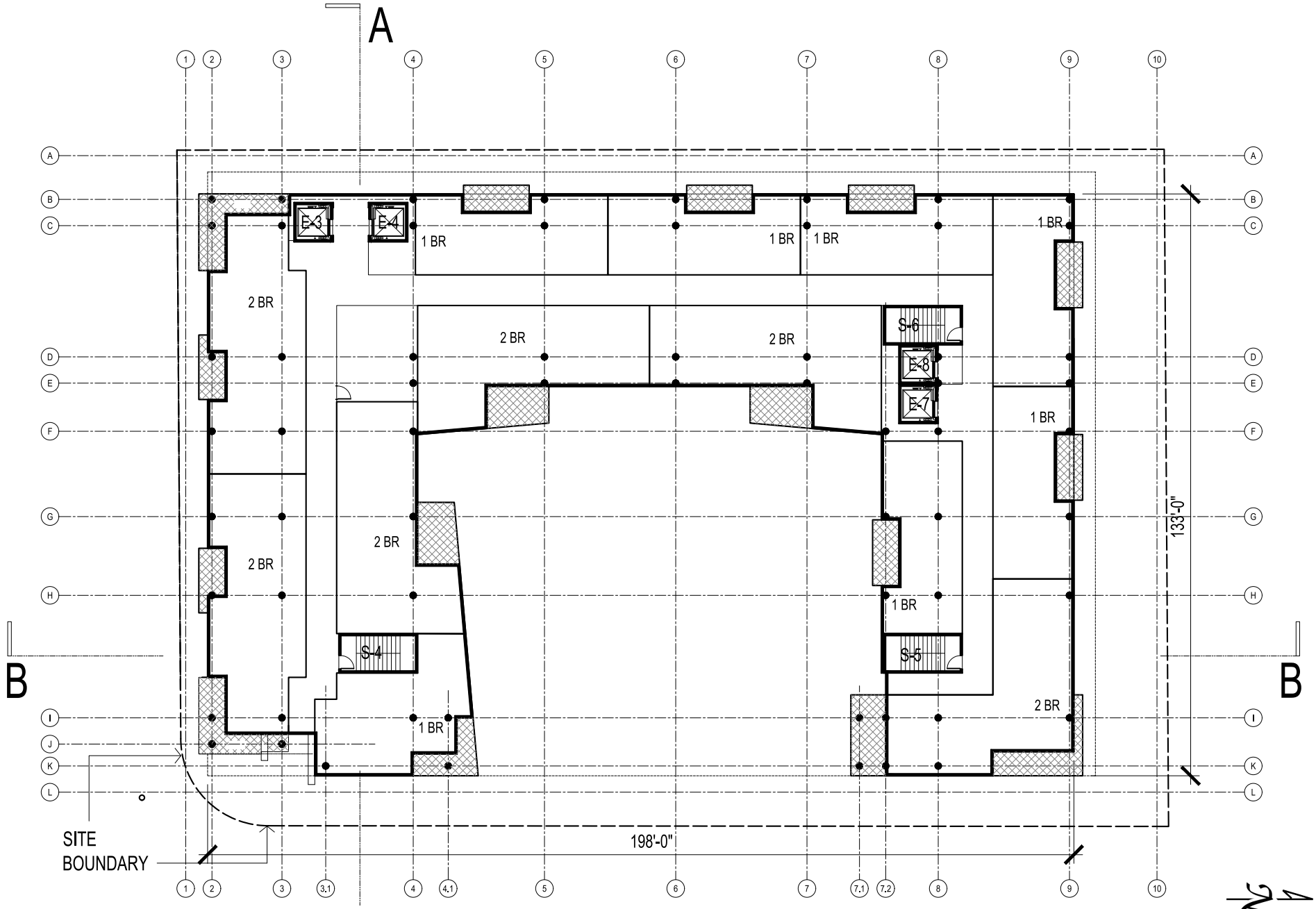
Figure II-8
Ground Floor Plan



Source: Danielian Associates Architecture and Planning, January 2017.

EcoTierra consulting

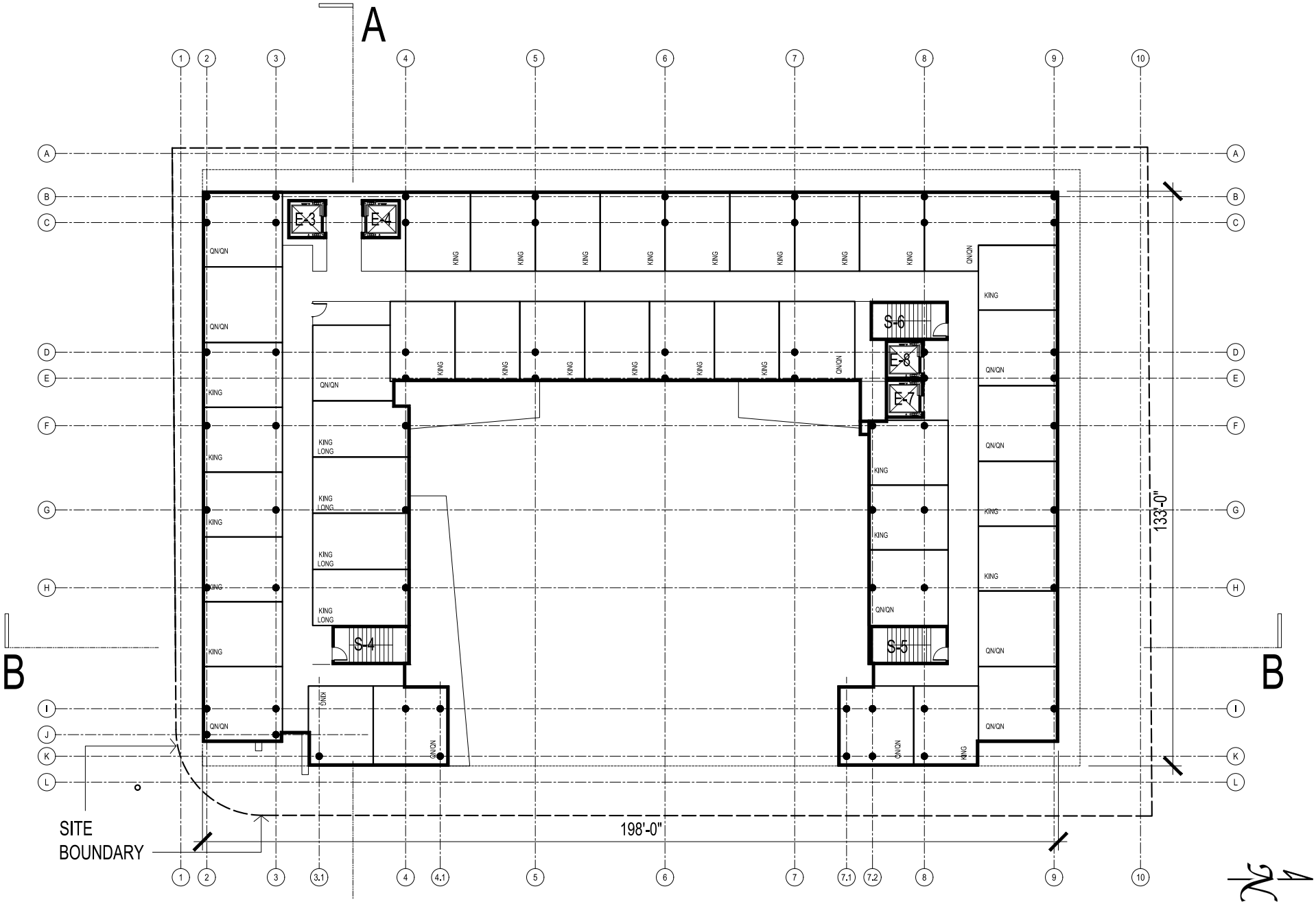
Figure II-9
Level 2 Floor Plan



Source: Danielian Associates Architecture and Planning, January 2017.

EcoTierra consulting

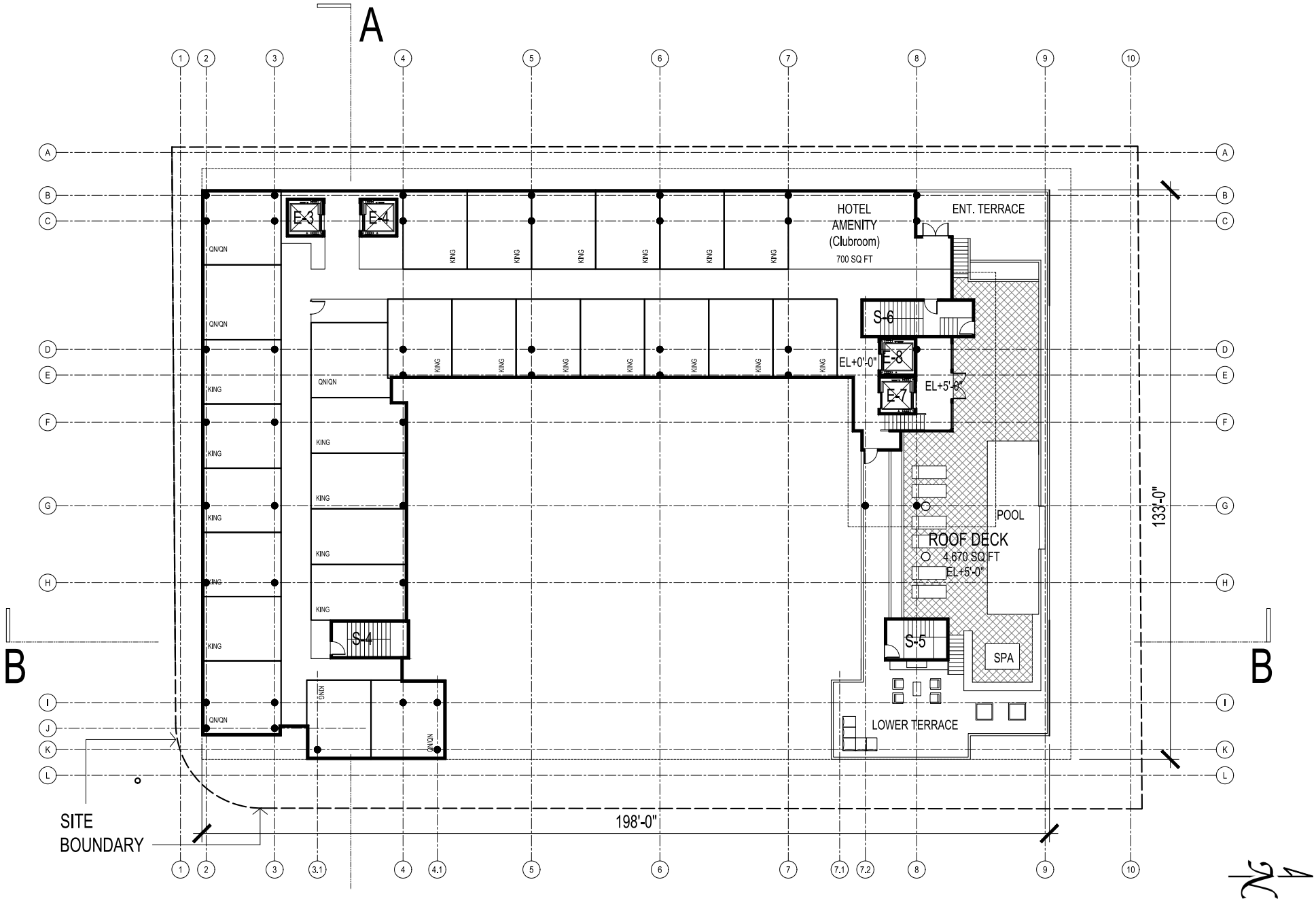
Figure II-10
Levels 3 to 5 Floor Plan



Source: Danielian Associates Architecture and Planning, January 2017.

EcoTierra consulting

Figure II-11
Levels 6 to 9 Floor Plan



Source: Danielian Associates Architecture and Planning, January 2017.

EcoTierra consulting

Figure II-12
Level 10 Floor Plan

Levels 6 through 10 include up to 200 hotel rooms (see Figure II-11, Levels 6 to 9 Floor Plan and Figure II-12 Level 10 Floor Plan). Level 10 also includes a 4,670-square-foot outdoor roof deck with a pool, spa and lounge terraces, and 700-square-foot hotel amenity (clubroom). Business hours for commercial operations including second level deck facing W. 6th Street, second level courtyard and tenth level roof deck amenities are proposed to be from 6:00 a.m. to 2:00 a.m. The proposed residential unit mix is anticipated to include 24 one-bedroom units and 20 two-bedroom units of a variety of sizes and configurations.

Table II-1
Project Development Summary

Land Use	Amount
Hotel	
Hotel Rooms	200
Hotel Room Square Footage	78,800 sf
Lobby	1,400 sf
Amenities & Support[a]	11,400 sf
Back of House[b]	6,100 sf
.	
Total Hotel	**97, 700 sf**
Residential Apartments	
1-Bedroom	24 du
2-Bedroom	20 du
Total Dwelling Units	**44 du**
Total Residential Apartment Units + Lobby Square Footage	**59,300sf**
Commercial	
Ground Floor Retail	16,500 sf
Second Level Cafe	1,500 sf
Total Commercial	**18,000 sf**
Total Building Floor Area	**175,000 sf**
Open Space	
Common Open Space	
Second Level Deck (Facing W. 6th Street)	1,450 sf
Second Level Courtyard	7,100 sf
Tenth Level Roof Deck	4,700 sf
Common Open Space (allocated to residents)	3,250 sf
Private Open Space	5,400 sf
Total Proposed Open Space	**21,900sf**

du = dwelling units; sf = square feet
a Give shop, concierge, front desk, in-door lounge, access and circulation.
b Laundry, linens storage, supplies storage, cleaning supplies storage, access and circulation.
Source: Danielian Associates, Architecture+Planning, May 2017.

B. Building and Site Design

The proposed mid-rise building is contemporary in style and is proposed to be integrated into the W. 6th Street frontage. The building has been designed to convey visual interest with articulated facades on all four sides, including the sides facing the interior courtyard. The building includes balconies on residential floor levels 3 through 5 and façade treatments that provide visual surface texture, such as

metal sunscreen awnings between the floors, metal composite walls, textured wall panels (with accent colors of blue, green or orange), metal railings, and masonry/stone veneer (store fronts along W. 6th Street and S. Harvard Boulevard). The building would be clad with low reflective glass in order to minimize glare. In addition, the parking on the subterranean levels is completely hidden from view.

The building is designed in a U-shape to locate many of the hotel amenities in the southern portion of the Project Site near W. 6th Street to maximize the distance from and provide buffering for the multi-family residential buildings to the north, as well as to promote an active streetscape along W. 6th Street and S. Harvard Boulevard. Hence, the hotel lobby is situated along W.6th Street, while the residential lobby in the northern part of the Project Site is closer to the multi-family uses to the north.

The Project creates a pedestrian friendly streetscape along W. 6th Street and S. Harvard Boulevard by locating the driveway on the north end of the site, and providing landscaping, pedestrian amenities, and entrances to retail and restaurant (café) uses directly off the sidewalk. Streetscape design includes street trees and enhanced paving at the corner of W. 6th Street and S. Harvard Boulevard as well as enhanced paving and plantings for the residence lobby entry from S. Harvard Boulevard. Figures II-13, Project Rendering A – S. Harvard Boulevard & W. 6th Street, through II-16, Rendering D – W. 6th Street Looking West, provide views of the Project Site with the new Project building as seen from various vantage point:

Figure II-13, Project Rendering A: S. Harvard Boulevard & W. 6th Street Looking North (from S. Harvard Boulevard);

Figure II-14, Project Rendering B: S. Harvard Boulevard Looking South (towards W. 6th Street with Wilshire Boulevard beyond;

Figure II-15, Project Rendering C: W. 6th Street Looking East; and

Figure II-16, Project Rendering D: W. 6th Street Looking West (east of S. Harvard Boulevard)

C. Open Space and Recreational Amenities

As shown in Table II-1, above, the Applicant proposes a minimum of approximately 20,971 square feet of on-site open space, including 12,321 square feet of common open space, 3,250 square feet of common open space allocated to residents, and 5,400 square feet of private open space. Project landscape plans are provided in Figure II-17, Landscape Plan—Ground Floor Level, Figure II-18, Landscape Plan—Level 2 and Courtyard, and Figure II-19, Landscape Plan—Level 10 Rooftop Deck.

The U-shaped building opens to the east towards S. Harvard Boulevard with a second-level common open space courtyard of approximately 7,055 square feet. The courtyard includes outdoor dining accessible from the second level hotel amenities and café and provides a bar/lounge area, linear fire pit and built-in bench seating and a water quality planter. The courtyard is divided into two areas and delineated on Figure II-14 with different colored flooring. As shown, the area nearest S. Harvard Boulevard is shaded brown and the remaining area toward the center and rear of the courtyard is shaded gray/slate.

The courtyard area closet to S. Harvard Boulevard would serve as outdoor dining for the café and would be accessible by an outdoor exterior staircase leading from ground level at the corner of W. 6th Street and S. Harvard Boulevard The café (including outdoor dining area) will be available to the pubic, as well

as residents and hotel patrons. The interior space of the café will accommodate approximately 50 to 70 persons and the outdoor dining area in the courtyard will accommodate approximately 120 to 140 persons. The center and rear area of the courtyard will be reserved for hotel guests and serve as a passive lounge area that may include a movable bar, built-in bench seating, as well as tables and chairs, and a linear fire pit and moveable piano for light background music. This area may be available for special events such as weddings and private parties with amplified music up to 10:00 p.m., in accordance with the City's noise ordinance. This area of the courtyard will accommodate up to approximately 200 persons on a daily basis, and up to 250 persons for special events. Separating the two areas of the courtyard from the Project apartments would be a landscaped water quality planter that will include pants and trees.

The second level also includes a common open space deck of 1,456 square feet that faces primarily towards W. 6th Street and is accessible from hotel amenities (e.g., front desk, concierge, gift shop and in-door lounge area). The intent of the outdoor deck is primarily additional passive lounge space, with chairs and table, serving hotel patrons.

The building's tenth level includes a common open space roof deck of approximately 4,670 square feet that includes a linear plunge pool and spa, linear benches, chaise lounge area with two terraces for residents and hotel patrons and will accommodate approximately 230 to 260 persons. The lower terrace faces S. Harvard Boulevard with a fireplace, lounge furniture, landscaped planter, bar tables and daybeds on turf. The entertainment terrace faces west and includes an outdoor dining table, lounge seating, and an outdoor kitchen and fireplace with access to an indoor lounge space (multipurpose room) that could be used for private parties. The outdoor roof deck will allow amplified music up to 10:00 p.m., in accordance with the City's noise ordinance. The outdoor deck open space and pool/spa would be available for use from 6:00 a.m. to 2:00 a.m. Private open space includes balconies for residential units.

As part of the Project, the five existing palm street trees (*Washingtonia robusta*) along S. Harvard Boulevard are expected to remain. Approximately two additional street trees along S. Harvard Boulevard and approximately five new street trees along W. 6th Street are planned for the Project. The type and locations of the new trees to be installed shall be coordinated with the City of Los Angeles Street Tree Division. Two of the five existing street trees are currently located in one tree well. Prior to Project approval, the Applicant will communicate with the Street Tree Division to ensure that the existing condition of two trees in one tree well is acceptable. Level 2 courtyard and Level 10 rooftop decks are planned to include approximately 15 new trees of varying species and size ranging from 24-inch to 48-inch boxes. The common open space areas will also include various large, medium, and low shrubs and groundcovers, and the turf at the rooftop deck will consist of synthetic turf.

D. Access and Parking

All vehicles (private autos, emergency, delivery, repair and moving trucks) would access the Project Site from S. Harvard Boulevard via one driveway. The driveway would provide two-way ingress and egress vehicular access to the Project Site. Further, there would be no vehicular access off W. 6th Street. The Project Site is located in an TPA and pursuant to ZI 2451, the Project parking impacts are not considered significant impacts on the environment. Parking details are provided for informational purposes only.

Source: Danielian Associates, May 2017.

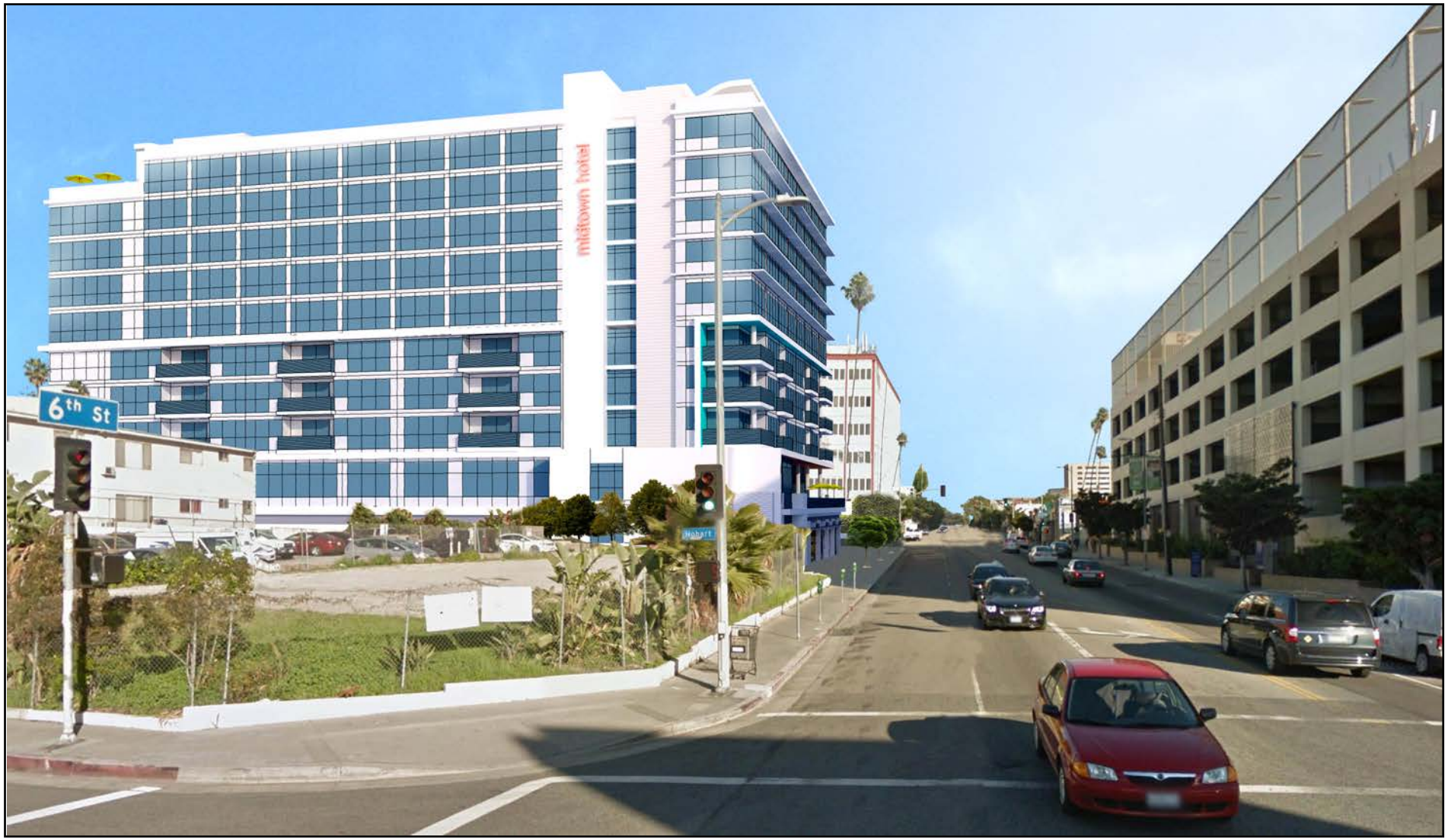
EcoTierra consulting

Figure II-13
Project Rendering A: S. Harvard Boulevard & W. 6th Street Looking North

Source: Danielian Associates, May 2017.

EcoTierra consulting

Figure II-14
Project Rendering B: S. Harvard Boulevard Looking South



Source: Danielian Associates, May 2017.

EcoTierra consulting

Figure II-15
Project Rendering C: W. 6th Street Looking East

Source: Danielian Associates, May 2017.

EcoTierra consulting

Figure II-16
Project Rendering D: W. 6th Street Looking West

Source: MJS Landscape Architecture, November 2016.

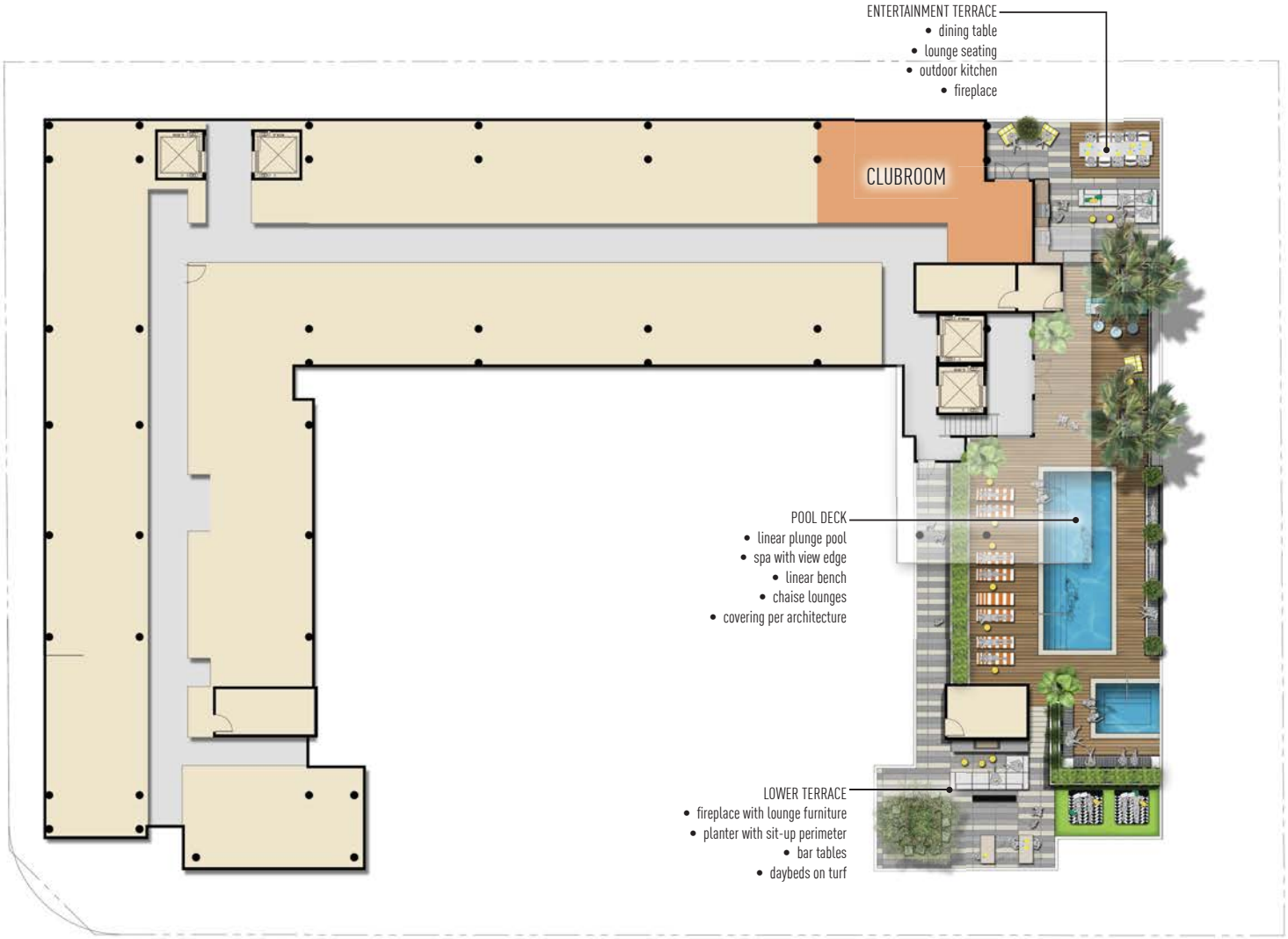
EcoTierra consulting

Figure II-17
Landscape Plan – Ground Level

Source: MJS Landscape Architecture, November 2016.

EcoTierra consulting

Figure II-18
Landscape Plan – Second Level Courtyard



Source: MJS Landscape Architecture, November 2016.

EcoTierra consulting

Figure II-19
Landscape Plan – Tenth Level Rooftop Deck

Parking for the Project would be provided in a three-level subterranean facility. In accordance with the City's Bicycle Parking Ordinance, and because of the Site's proximity to two Metro stations—Wilshire and Western Station and Wilshire and Normandie Station—the provision of these bicycle spaces permits a 10-percent reduction in each of the Project's residential, hotel, and retail vehicular parking requirements. As shown in Table II-2 (Vehicular Parking), the Project would be required to provide a minimum total of 205 vehicular parking spaces in accordance with LAMC requirements, however, with the bicycle parking reduction, the Project will provide 185 spaces.

As shown in Figures II-14, B-1 Parking Floor Plan through II-16, B-3 Parking Floor Plan, Level B-1 will provide 61 car spaces, Level B-2 will provide 74 spaces and Level B-3 will provide 70 car spaces. The Project will include 5 spaces for loading purposes with 1 space on Level B-1 and 2 spaces each for Levels B-2 and B-3. All 5 spaces will be reserved for truck deliveries and moving and repair vehicles.

The Project would provide short- and long-term bicycle parking in accordance with LAMC requirements, as summarized in Table II-3 (Bicycle Parking). The Project would be required to provide 34 short-term and 253 long-term bicycle spaces. Consistent with the Bicycle Parking Ordinance requirements, short-term bicycle parking spaces would be provided outside the building close to the Project's entrances, and the long-term bicycle parking would be provided inside the building in secured areas within each subterranean parking level (refer to Figures II-14, B-1 Parking Floor Plan through II-16, B-3 Parking Floor Plan). In accordance with Section 12.21 A.16(d)(v) of the LAMC, the Project would exceed the minimum requirement of 50 percent covered bicycle parking (if more than 20 short term spaces are provided) with approximately 91 percent (263 out of the 287) bicycle spaces located in covered parking.

Pedestrian access to the ground floor commercial retail use would be from both W.6th Street and S. Harvard Boulevard. Project hotel guests would have pedestrian access to the hotel lobby from W.6th Street. Project residents would access the Project Site from a residential lobby located on S. Harvard Boulevard. The hotel uses would also be accessed from the first two levels of the parking garage with dedicated hotel elevators and stairs. The residential uses would be accessed from the lowest parking level of the garage with dedicated elevators and stairs.

Table II-2
Vehicular Parking

Use Type	Units/Square Feet/Rooms	LAMC Requirement	No. of Spaces Required
Retail/Office			
Retail/office	18,000 sf	2 space/1,000 sf [a]	36
		Retail/ Office Parking Total Required	**36**
10% Bicycle Parking Reduction [b]			*3*
		Retail/office Subtotal with Bicycle Parking Reduction	***33***
Hotel			
Rooms—first 30 rooms	30 rooms	1 space/30 rooms	30
Rooms—second 30 rooms	30 rooms	1 space/2 rooms	15
Rooms—excess of 60 rooms	140 rooms	1 space/3 rooms	47
		Hotel Rooms Parking Total Required	**92**
10 % Bicycle Parking Reduction			*9*
		Hotel Rooms Subtotal with Bicycle Parking Reduction	***83***

Table II-2
Vehicular Parking

Use Type	Units/Square Feet/Rooms	LAMC Requirement	No. of Spaces Required
Residential			
1 bedroom	24 units	1.5 spaces/unit	36
2 bedroom	20 units	2 spaces/unit	40
		Residential Parking Total Required	**76**
10% Bicycle Parking Reduction [b]			*7*
		Residential Subtotal with Bicycle Parking Reduction	***69***
		Total Vehicle Parking Required	**205**
		Total Project Parking Provided (with Bicycle Parking Reduction)	***185***

Source: Danielian Associates, Architecture + Planning, November 2016
NOTE:
a Per LAMC Section 12.21.A4(x)(3).
b Per LAMC Section 12.21.A4.

Table II-3
Bicycle Parking

Use Type	Units/Square Feet	LAMC Requirement	Required Short-Term	Required Long-Term
Retail	18,000 sf	1 space/2,000 SF (short-term) 1 space/2,000 SF (long-term)	9	9
		Subtotal Retail	18 spaces	
Hotel	200 rooms	1 space/10 rooms (short-term) 1 space/room (long-term)	20	200
		Subtotal Hotel Rooms	220 spaces	
Residential	44 units	1 space/10 units (short-term) 1 space/unit (long-term)	5	44
		Subtotal Residential	49 spaces	
		Total Required Short Term	**34 spaces**	
		Total Required Long Term	**253 spaces**	
		Total Bicycle Parking Required	**287 spaces**	
		Total Bicycle Parking Provided	**287 spaces**	

Source: Danielian Associates, Architecture + Planning, November 2016

The Project Site is located within the City's Transit Priority Area (TPA) pursuant to Zoning Information (ZI) File No. 2452. The Project Site is in proximity to two Metro stations—Wilshire and Western Station (within one-third of a mile) and Wilshire and Normandie Station (within one-quarter of a mile) and situated along 6th Street with Metro Bus Line 18 serving 6th Street with numerous bus lines nearby (including Metro Bus Lines, 16, 17, 20, 207, 316, and Metro Rapid Lines 720, 757 and DASH Lines Hollywood/Wilshire and Wilshire Center/Koreatown). Senate Bill (SB) 743, effective January 1, 2014, made several changes to CEQA for projects located in areas served by transit. Among other changes, SB

743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. For further discussion, refer to Initial Study's Section IV., Environmental Impact Analysis, I. Aesthetics, and XVI. Transportation/Traffic.

E. FAR, Setbacks and Density

As set forth below, a General Plan Amendment from High Medium Residential and Neighborhood Office Commercial to Regional Center Commercial and a corresponding Vesting Zone Change and Height District Change from R4-2 and C2-1 to C2-2 are proposed to permit the approximately 175,000 square feet of total floor area proposed for the new building (refer to Figure II-2, Existing and Proposed Zoning). Based on the site area of 34,435 square feet, the floor-to-area ratio (FAR) for the Project Site would be5.1:1.[1] This would be less than the maximum 6:1 FAR that would be allowed under Height District.

For a mixed-use project in a C2 zone with a Regional Center Commercial designation, setbacks are not required along the W. 6th Street and S. Harvard Boulevard street frontages. The Project is a 10-story building with residential units starting on the second floor; therefore, a 13-foot side yard and 20-foot rear yard are required and provided. The subterranean parking garage extends to the Property line below ground, but it provides area for planting wells.

There is no limit on the density for a hotel use in a C2 zone in Regional Center Commercial designation. The residential density is limited to R5 density, which is one unit per 200 square feet of lot area, thereby allowing up to 173 residential units. The Project provides 44 residential units.

F. Operations/Security

Given the hotel and residential uses on-site, the Project would operate 24 hours per day. Business hours for commercial operations would likely be within the range of 6:00 a.m. to 2:00 a.m., depending on the requirements of the individual business. The courtyard area, second level deck (facing W. 6th Street) and tenth level roof deck spaces would allow gathering from 6:00 a.m. to 2:00 a.m., but music (piano or amplified) would be allowed up to 10:00 p.m. in accordance with City's noise ordinance. The Project would provide security features that include but are not limited to controlled access to residential areas, video surveillance, and mobile security surveying the parking garage.

G. Lighting and Signage

Project lighting would include architectural lighting, interior lighting, and exterior lighting for security and wayfinding purposes. These exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses to ensure no light spillage. Other Illuminated areas (second level deck facing W. 6th Street, second level courtyard and tenth level roof deck) would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. The courtyard and roof deck would include landscape lighting for soft illumination of planters and trees. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.

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[1] *Building area divided by Project Site total (square feet); 175,000 sf / 34,435 sf = 5.08 (round to 5.1).*

Project signage would comply with the LAMC, and any applicable approval processes for signs set forth therein. The character, placement, size, and proportions of the Project's proposed signs would be consistent with the LAMC. The commercial signs would be located so that they are visible along W. 6th Street and Harvard Boulevard frontages. Project signs would include a variety of types, including but not limited to hotel identification, tenant identification, and information/wayfinding signs.

H. Sustainability Features

The Project would comply with the Los Angeles Green Building Code, which builds upon and sets higher standards than those incorporated in the 2010 California Green Building Standard Code, or CALGreen. Some of the Project's key design features that contribute to energy efficiency include the installation of energy-efficient appliances, water-efficient irrigation systems, water-efficient indoor fixtures, use of locally sourced construction materials, and the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations. The Project would achieve several objectives of the City of Los Angeles General Plan Framework Element, Southern California Association of Governments Regional Transportation Plan, and South Coast Air Quality Management District Air Quality Management Plan for establishing a regional land use pattern that promotes sustainability.

The Project would support pedestrian activity along W. 6th Street in the Wilshire Community Plan area, and it would contribute to a land use pattern that addresses housing needs and reduces vehicle trips and air pollution by locating residential uses and hotel uses within an area that has public transit (with access to the Metro rail lines and existing regional bus service), and employment opportunities, retail and restaurant all within walking distance. Further, the Project's inclusion of bicycle parking, as discussed above, would encourage use of alternative modes of transportation.

3. CONSTRUCTION

The Project would be constructed over approximately 24 months. Construction activities would include the demolition of the existing parking lot and grading, excavation, and building construction. Demolition activities are anticipated to start in first quarter 2019, and construction completion and occupancy is anticipated in first quarter 2021.

Project implementation would require excavation of the site to an estimated depth of 45 feet resulting in export of approximately 58,000 cubic yards of soil. The likely outbound haul route for the Project would be a left turn from the Project Site to head east onto W. 6th Street, then a right turn onto Vermont Boulevard to the Hollywood Freeway (US Route 101). Exported materials would likely be disposed at Bradley Landfill and Recycling Center in Sun Valley and/or the Atkinson Brickyard site in the City of Compton. The Project's haul route would be approved by the City as part of its review and approval of the Project's entitlement requests.

4. DISCRETIONARY ACTIONS AND APPROVALS

The City of Los Angeles, Department of City Planning is the lead agency for the Project. In order to permit development of the Project, the City may require approval of one or more of the following discretionary actions:

(1) **General Plan Amendment** from High Medium Residential and Neighborhood Office Commercial to Regional Center Commercial, pursuant to LAMC Section 11.5.6;

(2) **Vesting Zone/Height District Change** from R4-2 and C2-1 to C2-2, pursuant to LAMC 12.32 to allow for a maximum FAR of 5.2:1;

(3) **A Conditional Use Permit** for a hotel use within 500 feet of an R zone pursuant to LAMC 12.24.W. 24;

(4) **A Conditional Use Permit** for the sale and dispensing of alcoholic beverages in the hotel and /or restaurant use pursuant to LAMC Section 12.24 W.1

(5) **Site Plan Review** for a development project that creates or result in an increase of 50,000 square feet or more of non-residential floor area or 50 or more dwelling units or guest rooms, pursuant to LAMC Section 16.05;

(6) **Vesting Tentative Tract Map** for air lots for the separate retail, office, and hotel uses, pursuant to LAMC 17.15 and one ground lot request which encompasses the entire lot; and

(7) **A Development Agreement** to provide for community benefits (Government Code 65864);

(8) **Grading, excavation, and building permits**;

(9) **Other ministerial or discretionary permits** may be necessary in order to execute and implement the project. Such approvals may include but are not limited to landscaping approvals, exterior approvals, permits for driveway curb cuts, stormwater discharge permits, and installation and hookup approvals for public utilities and related permits.

Federal, state, and regional agencies that may have jurisdiction over some aspect the project include but are not limited to:

- **Regional Water Quality Board**; and
- **South Coast Air Quality Management District**.

III. INITIAL STUDY CHECKLIST

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 10—HERB J. WESSON, JR.	**DATE:** July 28, 2017
RESPONSIBLE AGENCIES: Potentially including, but not limited to, Southern California Air Quality Management District and Los Angeles Regional Water Quality Control Board.		
PROJECT TITLE: 6th and Harvard Project	**ENVIRONMENTAL CASE:** ENV-2016-4470-EIR	**CASE NOS.** CPC-2016-4468-GPA-VZC-ZC-HD-CU-CUB-SPR; CPC-2016-4469-DA; VTT-74714
PREVIOUS ACTIONS CASE NO. N/A	☒ DOES have significant changes from previous actions. ☐ DOES NOT have significant changes from previous actions.	
PROJECT LOCATION: 3751 W. 6th Street and 547-551 S. Harvard Boulevard, Los Angeles, CA 90020		
PROJECT DESCRIPTION: See Section II of this Initial Study.		
ENVIRONMENTAL SETTING: See Section II of this Initial Study.		
COMMUNITY PLAN AREA: Wilshire **STATUS:** ☐ Preliminary ☐ Proposed ☒ ADOPTED in 2001	☒ Does Conform to Plan ☐ Does NOT Conform to Plan	**AREA PLANNING COMMISSION:** Central **CERTFIED NEIGHBORHOOD COUNCIL:** Wilshire Center-Koreatown
EXISTING ZONING: R4-2, C2-1	**MAX DENSITY ZONING:** 6:1	**LA River Adjacent:** No
GENERAL PLAN LAND USE: High Medium Residential, Neighborhood Office Commercial	**MAX. DENSITY PLAN:** 5.1:1	
NAME OF PERSON PREPARING FORM Elva Nuño-O'Donnell	**TITLE** City Planner	**TELEPHONE NUMBER** (818) 374-5066
ADDRESS Major Projects & EIR 6262 Van Nuys Boulevard, Room 351 Van Nuys, CA 91401	**SIGNATURE (Official)** Elva Nuño-O'Donnell	**DATE** July 28, 2017

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Elva Nuño-O'Donnell	City Planner	(818) 374-5066
Signature	**Title**	**Phone**

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

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

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

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

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

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

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

9. The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and

    b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Factors Potentially Affected:

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

☒ AESTHETICS (Informational)	☒ GREENHOUSE GAS EMISSIONS	☒ POPULATION AND HOUSING
❑ AGRICULTURE AND FOREST RESOURCES	☒ HAZARDS AND HAZARDOUS MATERIALS	☒PUBLIC SERVICES
☒ AIR QUALITY	☒ HYDROLOGY AND WATER QUALITY	☒ RECREATION
❑ BIOLOGICAL RESOURCES	☒ LAND USE AND PLANNING	☒TRANSPORTATION/CIRCULATION
☒ CULTURAL RESOURCES	❑ MINERAL RESOURCES	☒ TRIBAL CULTURAL RESOURCES
☒ ENERGY CONSERVATION	☒ NOISE	☒ UTILITIES
☒ GEOLOGY AND SOILS		☒ MANDATORY FINDINGS OF SIGNIFICANCE

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

Background

PROPONENT NAME:
Urban Commons

PHONE NUMBER:
(213) 260-9111

APPLICANT ADDRESS:
777 S. Figueroa Street, Suite 2850
Los Angeles, CA 90017

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:
November 22, 2016

PROPOSAL NAME (If Applicable):
6th and Harvard Project

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS**. Would the project:				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	❑	❑	❑	☒
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	❑	❑	❑	☒
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	❑	❑	❑	☒
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	❑	❑	❑	☒
II.	**AGRICULTURE 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a.	CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?	❑	❑	❑	☒
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	❑	❑	❑	☒
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	❑	❑	❑	☒
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	❑	❑	❑	☒
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	❑	❑	❑	☒
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 SCAQMD OR CONGESTION MANAGEMENT PLAN?	☒	❑	❑	❑
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	☒	❑	❑	❑
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	☒	❑	❑	❑
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT	☒	❑	❑	❑

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	CONCENTRATIONS?				
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	❑	❑	☒	❑
IV.	**BIOLOGICAL RESOURCES**. Would the project:				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	❑	❑	❑	☒
b.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	❑	❑	❑	☒
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?	❑	❑	❑	☒
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	❑	❑	☒	❑
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	❑	❑	☒	❑
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	❑	❑	❑	☒
V.	**CULTURAL RESOURCES.** Would the project:				
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	❑	❑	☒	❑
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	☒	❑	❑	❑
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	☒	❑	❑	❑
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	❑	❑	☒	❑
VI.	**GEOLOGY AND SOILS.** Would the project:				
a.	EXACERBATE EXISTING ENVIRONMENTAL CONDITIONS SO AS TO INCREASE THE POTENTIAL TO EXPOSE PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING:				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i.	RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.	☒	❑		❑
ii.	STRONG SEISMIC GROUND SHAKING?	☒	❑	❑	❑
iii.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	☒	❑	❑	❑
iv.	LANDSLIDES?	❑	❑	❑	☒
b.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	❑	❑	☒	❑
c.	BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE CAUSED IN WHOLE OR IN PART BY THE PROJECT'S EXACERBATION OF THE EXISTING ENVIRONMENTAL CONDITIONS?	☒	❑	❑	❑
d.	BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY CAUSED IN WHOLE OR IN PART BY THE PROJECT EXACERBATING THE EXPANSIVE SOIL CONDITION?	☒	❑	❑	❑
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?	❑	❑	❑	☒
VII.	**GREENHOUSE GAS EMISSIONS.** Would the project:				
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	☒	❑	❑	❑
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	☒	❑	❑	❑
VIII.	**HAZARDS AND HAZARDOUS MATERIALS.** Would the project:				
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	❑	❑	☒	❑
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	☒	❑	❑	❑
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	❑	❑	☒	❑
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, HAS THE POTENTIAL TO EXACERBATE THE CURRENT ENVIRONMENTAL CONDITIONS SO AS TO CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	☒	❑	❑	❑
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES	❑	❑	❑	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT HAVE THE POTENTIAL TO EXACERBATE CURRENT ENVRIONMENTAL CONDITIONS SO AS TO RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?				
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT HAVE THE POTENTIAL TO EXACERBATE CURRENT ENVIRONMENTAL CONDITIONS SO AS TO RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	❑	❑	❑	☒
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	❑	❑	☒	❑
h.	EXACERBATE EXISTING ENVRIONMENTAL CONDITIONS SO AS TO INCREASE THE POTENTIAL TO EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	❑	❑	❑	☒
IX.	**HYDROLOGY AND WATER QUALITY.** Would the project:				
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	☒	❑	❑	❑
b.	SUBSTANTIALLY DEPLETE GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	☒	❑	❑	❑
c.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	☒	❑	❑	❑
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	☒	❑	❑	❑
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	☒	❑	❑	❑
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	☒	❑	❑	❑
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	❑	❑	❑	☒
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	❑	❑	❑	☒
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS	❑	❑	☒	❑

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	A RESULT OF THE FAILURE OF A LEVEE OR DAM?				
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	❑	❑	❑	☒
X.	**LAND USE AND PLANNING.** Would the project:				
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	❑	❑	☒	❑
b.	CONFLICT WITH 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?	☒	❑	❑	❑
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	❑	❑	❑	☒
XI.	**MINERAL RESOURCES.** Would the project:				
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	❑	❑	❑	☒
b.	RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	❑	❑	❑	☒
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?	☒	❑	❑	❑
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	☒	❑	❑	❑
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	☒	❑	❑	❑
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	☒	❑	❑	❑
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	❑	☒
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	❑	☒
XIII.	**POPULATION AND HOUSING.** Would the project:				
a.	INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE)?	☒	❑	❑	❑
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒
XIV.	**PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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?	☒	❑	❑	❑
b.	POLICE PROTECTION?	☒	❑	❑	❑
c.	SCHOOLS?	☒	❑	❑	❑
d.	PARKS?	☒	❑	❑	❑
e.	OTHER PUBLIC FACILITIES?	☒	❑	❑	❑
XV.	**RECREATION**				
a.	WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?	☒	❑	❑	❑
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	☒	❑	❑	❑
XVI.	**TRANSPORTATION/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?	☒	❑	❑	❑
b.	CONFLICT WITH AN APPLICABLE CONGESTION MANAGEMENT PROGRAM, INCLUDING BUT NOT LIMITED TO LEVEL OF SERVICE STANDARDS AND TRAVEL DEMAND MEASURES, OR OTHER STANDARDS ESTABLISHED BY THE COUNTY CONGESTION MANAGEMENT AGENCY FOR DESIGNATED ROADS OR HIGHWAYS?	☒	❑	❑	❑
c.	RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	❑	❑	❑	☒
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	❑	❑	❑	☒
e.	RESULT IN INADEQUATE 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	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES. Would the project:					
a.	BE 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)?	☒	❑	❑	❑
b.	SITE BE A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED 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 SUBDIVSION (C) OF PUBLIC RESOURCES SECTION 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE?	☒	❑	❑	❑
XVIII. UTILITIES. 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 STORMWATER 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 RESOURCE, 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 – ENERGY CONSERVATION?	☒	❑	❑	❑
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	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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).	☒	❑	❑	❑
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	☒	❑	❑	❑

IV. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist. The thresholds of significance are based on the practices of the City of Los Angeles (City), the *L.A. CEQA Thresholds Guide*, and other sources as noted.

IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[1]

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for ***informational purposes only*** and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such,

[1] *City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed June 30, 2017.*

nothing in the aesthetic impact discussion in this initial study (or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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

No Impact. A significant impact may occur if a project would have a substantial adverse effect on a scenic vista. The Project Site is located within an urban area of Koreatown/Mid Wilshire. Visual resources within the vicinity of the Project Site with the potential to be considered scenic include distant and obscured views of the Santa Monica Mountains (Hollywood Hills), approximately 3 miles to the south. Therefore for purposes of this analysis, the Santa Monica Mountains (Hollywood Hills) is considered a scenic resource and views of it are considered scenic vistas. The Santa Monica Mountains (Hollywood Hills) are visible from several observation points throughout the City and beyond its boundaries. The immediate existing visual context of the Project and surrounding consists of building structures of varying heights, including low-rise (two- to three-story residential), mid-rise (five – to six-story office and parking) and high-rise (20+-story office) buildings. The existing viewshed at the Project Site is defined by existing urban development and potential views of the Santa Monica Mountains (Hollywood Hills). Public views of the Santa Monica Mountains are limited in the area and afforded primarily from S. Harvard Boulevard looking north.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic vistas.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic vistas.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

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

No Impact. A significant impact may occur if a project would substantially damage scenic resources within a state scenic highway. The Project Site is not located within a State-designated, nor City-designated, scenic highway or associated view corridor.[2]

There are no significant natural features (such as rock outcroppings, bodies of water, substantial stands of native vegetation, etc.) or native California trees of particular aesthetic value (e.g., oak trees) on the Project Site. The nearest city-designated scenic highway is W. Adams Boulevard and W. Los Feliz Boulevard,[3] which are approximately 2 miles south and 3 miles north from the Project Site, respectively.

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[2] *City of Los Angeles, Department of City Planning, Mobility Plan 2035, An Element of the General Plan, Map A4, September 7, 2016.*

[3] *City of Los Angeles, Department of City Planning, Mobility Element of the General Plan, Map A4, September 7, 20156. Website: http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf. Accessed December 12, 2016.*

Because of distance and intervening urban development, the Project Site is not visible from W. Adams Boulevard or W. Los Feliz Boulevard. Therefore, there is no potential to damage scenic resources within a city-designated scenic highway and no impact would occur and further analysis of this issue is not required.

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

No Impact. A significant impact may occur if a project would substantially degrade the existing visual character or quality of the site and its surroundings. The Project would replace an existing one-story structure and surface parking lot with a mixed-use, mid-rise (10-story) development. The Project building would rise to a maximum height of 130 feet above grade, and the Project would include hotel, retail, restaurant and residential uses. While the proposed land uses would be consistent with existing land uses in the immediate area, the Project would modify the existing visual character of the Project Site and its surroundings by increasing the height and density of on-site development.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to visual character or quality.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

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

No Impact. A significant impact may occur if a project would create a new source of light or glare which would adversely affect daytime or nighttime views in the area. The Project Site is located within an urban area of Koreatown/Mid-Wilshire area of Los Angeles that is characterized by urban nighttime artificial light levels. Due to limited on-site development, current Project Site land uses generate lower levels of interior and exterior lighting based on the existing relatively low-density one-story structure and surface parking lot. The Project is anticipated to increase light levels over existing conditions as a result of increased density and height associated with architectural lighting, security lighting, interior lighting, and outdoor illumination of the courtyard and roof deck amenities. The Project would also introduce new building surface materials to the Project Site with the potential to generate glare (multiple levels of windows, metal materials, etc.).

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to light and glare.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

Shading impacts are influenced by the height and bulk of a structure, time of year, duration of shading during the day, and the proximity of shade-sensitive land uses, or receptors. The immediate Project vicinity (to the north of the Project Site) is characterized by a number of low-rise (two- to three story residential) buildings.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact to shading.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for aesthetics is no impact.

Cumulative Impacts

No Impact. The Project Site is located within a City of Los Angeles TPA. The City's TPA map shows that the communities of Hollywood, Wilshire, Silver Lake-Echo Park-Elysian Valley, Westlake, Central City, Central City North, Boyle Heights, and large areas of other surrounding communities are located in TPA areas. Therefore, aesthetics changes resulting from any of the related Projects would not be considered significant impacts. Further, Pursuant to SB 743 and ZI 2452, the Project in combination with the related projects would not result in impacts to aesthetics, light and glare, and shading

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, the EIR will include a discussion of the Project's impacts under the City thresholds for informational purposes only. The impact conclusion for cumulative aesthetics is no impact.

II. AGRICULTURE AND FOREST RESOURCES

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if the Project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use.

The Project Site is currently developed with a building and a surface parking lot. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.[4] Therefore, no impact would occur and further analysis of this issue is not required.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if the Project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

The Project Site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site

[4] *Source: State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012 Map. Website: ftp://ftp.consrv.ca.gov/pub/Dlrp/FMMP/pdf/2012/los12.pdf. Accessed December 6, 2016.*

is currently zoned R4-2 and C2-1 as a land use designation of High Medium Residential and Neighborhood Office Commercial in the Wilshire Community Plan. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. Consequently, no Williamson Act contracts could be in effect for the Project Site.[5] Therefore, no impact would occur, and further analysis of this issue is not required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(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. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a Project were to result in the conversion of land zoned 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)).

The Project Site is currently developed with a building and a surface parking lot. It is located within the jurisdiction of the City of Los Angeles and is therefore subject to the applicable land use and zoning requirements in the LAMC, particularly, Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned R4-2 and C2-1 as a land use designation of High Medium Residential and Neighborhood Office Commercial in the Wilshire Community Plan. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur and further analysis of this issue is not required.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a Project were to result in the loss of forest land or conversion of forest land to non-forest use.

The Project Site is currently developed with a building and surface parking lot. No forest land exists on or in the vicinity of the Project Site. Therefore, no impact would occur and further analysis of this issue is not required.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a Project results in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

The Project Site is currently developed with a building and surface parking lot. Neither the Project Site, nor nearby properties are currently utilized for agricultural or forestry uses, and, as discussed above (Section 2(a)), the Project Site is not classified in any "Farmland" category designated by the State of

[5] *Ibid.*

California. According to the City General Plan Conservation Element Exhibit B2,[6] the Project Site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). Therefore, no impact would occur.

Cumulative Impacts

No Impact. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.[7] The Project Site and the related Projects are located in an urbanized area in the City and do not include any State-designated agricultural lands or forest uses. Development of the Project in combination with the related Projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor would it result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no cumulative impact would occur.

III. AIR QUALITY

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

Potentially Significant Impact. A significant impact may occur if the Project is not consistent with the applicable air quality plan or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the Air Quality Management Plan (AQMP) that is prepared by the South Coast Air Management District (SCAQMD). The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and state ambient air quality standards. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of the SCAQMD on March 3, 2017. Referred to as the 2016 AQMP, it was prepared to comply with the federal and state Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and state air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The future air quality levels Projected in the 2016 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by the Southern California Association of Governments (SCAG) in its most current version of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted on April 7, 2016. The 2016 AQMP also assumes that general development Projects will include strategies (mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control measures.

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[6] *City of Los Angeles Conservation Element. Website: http://planning.lacity.org/cwd/gnlpln/consvelt.pdf. Accessed December 6, 2016.*

[7] *Ibid.*

For development Projects, the SCAQMD recommends that consistency with the current AQMP be determined by comparing the population generated by the Project to the population projections used in the development of the AQMP. Projects that are consistent with SCAG's applicable growth projections would not interfere with air quality attainment because this growth is included in the projections utilized in the formulation of the 2016 AQMP. This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. Air pollutants would be emitted as a result of demolition, grading, and the construction of the Project. In addition, air pollutants would be emitted as a result of automobiles travelling to and from the Project Site during operation. Since the Project introduces a greater intensity of development to the Project Site, the resulting emissions could violate air quality standards set by the SCAQMD during both construction and operation. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

c) Would the project 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 threshold for ozone precursors)?

Potentially Significant Impact. A significant impact may occur if a project would add a considerable cumulative contribution to federal or state non-attainment pollutants. The Basin, wherein the Project Site is located, is currently in non-attainment for ozone, $PM_{2.5}$, lead, and particulate matter. The construction and operation of a new intensity of development from the Project could emit criteria air pollutants that could potentially result in a cumulatively considerable net increase of criteria air pollutants. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. SCAQMD currently recommends that impacts to sensitive receptors be considered significant when emissions generated at a project site causes localized pollutant levels to exceed state ambient air quality standards at sensitive receptors or where a project causes an increase in local contaminants during construction and operation of the project. A significant impact may also occur where a project would cause concentrations at sensitive receptors located near congested intersections to exceed the national or state ambient air quality standards and the traffic generated by the project contributes to the concentrations.

Sensitive receptors in proximity of the Project Site include but are not limited to the existing multi-family residences immediately adjacent to the Project Site to the north.[8] The construction and operation of a new intensity of development from the Project could emit substantial concentrations of air pollutants

[8] *Additional sensitive receptors may be identified during the preparation of the EIR.*

near those sensitive receptors. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Less Than Significant Impact. Project-related significant adverse effects could occur if construction or operation of a project would result in generation of odors that would be perceptible in adjacent sensitive areas.

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities. The Project involves the construction and operation of a mixed-use residential and commercial development, which includes land uses that are not typically associated with odor complaints according to SCAQMD. As the Project involves no elements related to industrial or other objectionable strong odor-generating land uses, no objectionable odors are anticipated. Therefore, the potential impacts associated with objectionable odors would be less than significant and no mitigation measures are required.

Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project Site. The Project would use typical construction techniques, and the odors would be typical of most construction sites and temporary and intermittent in nature. Therefore, construction of the Project would result in less than significant impacts related to odors, and further analysis of this issue is not required.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to air quality may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

IV. BIOLOGICAL RESOURCES

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or

- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is currently developed with a building and surface parking lot and is located in an urbanized area of the City. There are no protected trees as defined by the City of Los Angeles Protected Tree Ordinance No. 177404 (i.e., native oaks [*Quercus sp*.], western sycamore [*Platanus racemosa*], Southern California black walnut [*Juglans californica*] and California bay [*Umbellularia californica*], which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree) on the Project Site. The only vegetation on the Project Site consists of approximately five existing palm (*Washingtonia robusta*) street trees along S. Harvard Boulevard.

According to Exhibit C-5 of the *L.A. CEQA Thresholds Guide*, the Project Site and surrounding area are not identified as a biological resource area.[9] Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[10] The Project Site does not contain any habitat capable of sustaining 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. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state- or federally listed species. Therefore, no impact would occur and further analysis of this issue is not required.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- The alteration of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

[9] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-2, Biological Resource Areas (Metro Geographical Area).*

[10] *Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, website: http://planning.lacounty.gov/gisnet3, accessed: December 15, 2016.*

The Project Site is developed with an existing building and surface parking lot in a developed area of the City. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.[11,12] As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. The Project Site is in an urbanized area surrounded by development, roadways, and freeways, and there is no sensitive habitat areas located on or adjacent to the Project Site. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. Therefore, no impact would occur, and further analysis of this issue is not required.

c) Would the project 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat.

The Project Site is developed with an existing single-story commercial building and surface parking lot in a developed area of the City. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site.[13] Furthermore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Therefore, no impact would occur, and further analysis of this issue is not required.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in interference with wildlife movement or migration corridors that may diminish the chances for long-term survival of a sensitive species.

As discussed in Section IV.(a), the Project Site is located in an area that has been previously developed in an urbanized area of the City of Los Angeles. Due to the urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. The five existing palm (*Washingtonia robusta*) street trees along S. Harvard Boulevard will remain on the Project Site and will not be removed. Two of the five trees are currently located in one tree well. Prior to Project approval, the Applicant will communicate with the Street Tree Division to ensure that the existing condition of two trees in one tree well is acceptable. The nearest wildlife corridor is within the Santa Monica Mountains and the Santa Monica Mountains Recreation area, which includes Runyon Canyon, located approximately 4 miles

[11] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-2, Biological Resource Areas (Metro Geographical Area).*

[12] *U.S. Fish and Wildlife Service,* National Wetlands Inventory, Wetlands Mapper, website: *http://www.fws.gov/wetlands/Data/Mapper.html*, accessed: December 6, 2016.

[13] *Ibid*.

northwest of the Project Site.[14] [15] In addition, the Hollywood Reservoir area and Griffith Park are designated as Los Angeles County Significant Ecological Areas (SEAs) according to Exhibit B2 of the Los Angeles General Plan Conservation Element. The Project Site is located approximately 4 miles southeast with urban developed land in between. As such, the Project would not interfere with the movement of any resident or migratory fish or wildlife species. Therefore, impacts would be less than significant, and further analysis of this issue is not required.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 177404 and/or LAMC Section 17.05(R) that regulates the relocation or removal of a specified protected tree. In addition to the Protected Tree Ordinance, it is the City's policy that all mature trees (at least 8 inches in diameter at breast height) that are removed at development sites as part of Project implementation are replaced at a 1:1 ratio and the removal of any trees in the public right-of-way be approved by the Board of Public Works.

As discussed in Section IV(a), the Project Site is developed with a building and surface parking lot with no trees (with the exception of street trees) and no protected trees as defined by the City of Los Angeles Protected Tree Ordinance No. 177404. Protected trees are defined as native oaks [*Quercus* sp.], western sycamore [Platanus racemosa], Southern California black walnut [Juglans californica] and California bay [*Umbellularia californica*], which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree. The five palm street trees are expected to be retained along S. Harvard Boulevard. Since these trees are not protected species under Ordinance 177404 and would remain on site, Project implementation would not violate City regulation LAMC 17.05 (R) that pertains to relocation or removal of protected trees. Therefore, impacts would be less than significant and no mitigation measures would be required. No further analysis of this issue is required.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if the Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local,

[14] *US National Park Service, Santa Monica Mountains National Recreation Area. Website: https://www.nps.gov/samo/planyourvisit/maps.htm, accessed May 10, 2017.*

[15] *City of Los Angeles, General Plan Conservation Element, adopted September 2001, Wildlife Corridor definition: Wildlife corridors are land segments that connect two or more large habitat areas and provide a habitat for movement of animals between those areas.*

regional, or state habitat conservation plan.[16] Therefore, no impact would occur, and further analysis of this issue is not required.

Cumulative Impacts

Less Than Significant Impact. As discussed above, the purpose of Ordinance 177,404 is to protect and conserve the identified tree species throughout the City. The Project would not affect protected tree species, and thus would not contribute to any potential cumulative effect in this regard. It is not known at this time if future development of the related projects or other development projects in the City would involve the removal of protected tree species. However, each related project would be evaluated on a case-by-case basis to determine if impacts are identified pursuant to Ordinance No. 177404 and would be required to replace the trees per the specifications of the ordinance and be regulated via LAMC 17.05 (R) pertaining to relocation or removal of protected trees.

The Project would result in less than significant biological resource impacts and, as such, would not contribute to a cumulative impact.

V. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Potentially Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources, which presently exist within the project site. Section 15064.5 of the *CEQA Guidelines* defines a historical resource as:

1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;

2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or

3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A significant adverse effect would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The 16,854-square-foot building, currently used as the United States Post Office—Dosan Ahn Chang Ho Station was built in 1959[17] and, thus, on the basis of its age could potentially be eligible as a historic

[16] *California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015, website: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed: December 17, 2016.*

[17] *City of Los Angeles, Department of City Planning, ZIMAS, website: http://zimas.lacity.org, accessed December 13, 2016.*

resource. However, the building on the Project Site is not listed in the California Register, designated as a local Monument or identified in the SurveyLA report for the Wilshire Community Plan area.[18] Nevertheless, based on the age of the structure, the building is eligible for consideration as an historic resource. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources potentially existing within the Project Site.

Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features such as tools, utensils, carvings, fabric, building foundations, etc. that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project would require grading and excavation on the site for subterranean parking levels and other construction activities that have the potential to disturb existing undiscovered archaeological resources and appropriate mitigation would be required in the event resources are discovered. Therefore, the discovery of and significance of impacts to archaeological resources shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features that presently exist within the site.

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 disturbed with a developed paved surface parking lot, the Project would require grading and excavation, which would have the potential to disturb undiscovered paleontological resources that may exist within the Project Site and appropriate mitigation would be required in the event resources are discovered. This potential impact shall be evaluated in an EIR.

[18] *SurveyLA, Historic Resources Survey Report, Wilshire Community Plan Area, website: http://preservation.lacity.org/sites/default/files/ARG%20FINAL%20Wilshire%20Report_HPLAEdit.pdf, accessed December 13, 2006*

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

Less Than Significant Impact. A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains. As discussed above, the Project Site is located within an urbanized area and has been subject to previous disturbance and development. It is unknown whether human remains are located at the Project Site. Any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. Even so, should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with state laws falling within the jurisdiction of the Native American Heritage Commission (PRC Section 5097) that relate to the disposition of Native American burials would be required. Therefore, impacts would be less than significant, and further analysis of this issue is not required.

Cumulative Impacts

Potentially Significant Impact. The Project's impact to cultural resources may be potentially significant and may result in significant cumulatively considerable impacts. Cumulative impacts to historic resources shall be further evaluated in an EIR.

VI. GEOLOGY AND SOILS

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds below are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

a) Would the project <u>exacerbate existing environmental conditions so as to</u> increase the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a Project Site is located within a state-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed. The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped

adjacent to, within, and beneath the City. The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone.[19] The nearest active fault is the Puente Hills Blind Thrust Fault, approximately 0.8 mile from the Project Site.[20] Thus, the potential for future surface rupture is very low. Moreover, the Project Site is not within a Preliminary Fault Rupture Study area.[21] Additionally, the City of Los Angeles Building Code, with which the proposed Project would be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. Although Project development must comply with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, further analysis of the potential for strong seismic ground shaking from earthquake faults is recommended., Therefore, impacts may be potentially significant and further analysis of this topic shall be evaluated in an EIR.

(ii) Strong seismic ground shaking?

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a proposed Project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the southern California region. The Project would increase the amount of development on-site, thereby increasing the number of residents, employees, and visitors on-site. Therefore, additional people and structures would be exposed to potential adverse effects from ground shaking than under existing conditions. Although Project development must comply with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, further analysis of the potential for strong seismic ground shaking is recommended. A geotechnical study will be provided for the Project that will determine the Project's risk from strong seismic ground shaking and will include design recommendations based on site-specific conditions and building plans. This information will be used to analyze the potential impact from strong seismic ground shaking in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the Project.

Liquefaction is a process whereby strong seismic shaking causes unconsolidated, water-saturated sediment to temporarily lose strength and behave as a fluid. The possibility of liquefaction occurring at a

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[19] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org, accessed December 13, 2016.*

[20] *Ibid.*

[21] *Ibid.*

given site is dependent on several factors, including anticipated intensity and duration of ground shaking; the origin, texture and composition of shallow sediments in general, cohesionless, fine-grained sediments, such as silts or silty sands, and areas of uncompacted or poorly compacted fills are more prone to liquefaction); and the presence of shallow groundwater.

While the Project Site is not identified by the City as susceptible to liquefaction, a geotechnical report for the Project Site would identify the underlying geologic materials and groundwater levels so as to assess and account for a potential risk from seismic-related ground failure including liquefaction, and as such, the preparation of a geotechnical report is warranted. The Project may potentially expose people or structures to substantial adverse effects from seismic-related ground failure. Therefore, impacts may be potentially significant. This potential impact shall be evaluated in an EIR.

(iv) Landslides?

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a Project-related significant adverse effect may occur if the Project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

The Project Site is not located within an area identified by the City or the State Department of Conservation as having a potential for landslides, or of a known landside.[22] [23] [24]The Project Site and surrounding area consist of relatively flat topography. The Project Site is not in the path of any known or potential landslides. Furthermore, the development of the Project does not propose substantial alteration to the existing topography. Therefore, no impact would occur and no mitigation measures would be required. No further analysis of this issue is required.

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

Less Than Significant Impact. A significant impact may occur if a Project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is currently developed with a building and other impervious site improvements. The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, grading and excavation would expose minimal amounts of soils for a limited time, allowing for possible erosion. All grading activities require grading permits from the Department of Building and Safety. All grading on the site would be required to be comply with the provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code that addresses grading, excavations, and fills. The permits typically require that grading work in excess of 200 cubic yards (cy) that would occur between November 1 and April 15 (the "rainy season") must include an erosion control system approved by the Department of Building and Safety. If excavation and grading activities must be scheduled during the rainy season, a Wet Weather Erosion Control Plan must be

[22] *Ibid.*

[23] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit C, Landslide Inventory & Hillside Areas, Adopted November 1996.*

[24] *California Department of Conservation, Hollywood Quadrangle, Seismic Hazard Zones, 1999. Website: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_holly.pdf, accessed May 9, 2017.*

prepared pursuant to the "Manual and Guidelines for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. However, because of the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in a Stormwater Pollution Prevent Program (SWPPP), which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the structure and paving, while the remaining portions of the Project Site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project, and this impact would be less than significant and no mitigation measures would be required. No further analysis of this issue is required.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Potentially Significant Impact. A significant impact may occur if a Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for proposed buildings, thus posing a hazard to life and property. As discussed above, the Project Site is susceptible to ground shaking. In addition, as discussed in Checklist Question 6(a)(iii), potential liquefaction impacts also will be addressed in an EIR. As discussed above in response to Checklist Question 6(a)(iv), impacts associated with landslides would not occur as part of the Project. A geotechnical report for the Project Site would identify the underlying geologic materials and groundwater levels so as to assess and account for a potential risk from an unstable geologic unit or soil, and as such, the preparation of a geotechnical report is warranted. The Project may result in potential significant impacts associated with unstable soils resulting in lateral spreading, subsidence, or liquefaction. Therefore, impacts may be potentially significant. This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if the Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for Project buildings, thus posing a hazard to life and property. A geotechnical report for the Project Site would identify the underlying geologic materials and groundwater levels and would assess and account for a potential risk from an unstable geologic unit or soil; as such, the preparation of a geotechnical report is warranted. The Project may potentially expose people or structures to substantial adverse effects from an unstable geologic unit or soil. Therefore, impacts may be potentially significant. This potential impact shall be evaluated in an EIR.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, this question would apply to the Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary, nor are they proposed. No impact would occur and no mitigation measures would be required. No further analysis of this issue is required.

Cumulative Impacts

Potentially Significant Impact. Cumulative development in the Project vicinity would likely increase the overall population in the area, thus increasing the risk of geological and soil hazards particularly to Project-specific issues that shall be further evaluated in an EIR. Therefore, cumulative geological and soils impacts shall be further evaluated in an EIR.

VII. GREENHOUSE GAS EMISSIONS

a) Would the project 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, since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, would generate greenhouse gas emissions. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant air quality impact may occur if a Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Construction and operation of the Project would generate GHG emissions, which may be inconsistent or in some way represent a substantial hindrance to employing the policies or obtaining the goals of GHG reduction plans. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

Cumulative Impacts

This potential impact shall be evaluated in an EIR.

VIII. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant impact to hazards and hazardous materials if it routinely transported, used, or disposed of hazardous materials. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in other residential, hotel and commercial developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, and local regulations for safe handling of hazardous substances. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Therefore, the Project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. A less than significant impact would occur and no mitigation measures are required. No further analysis of this issue is required.

b) Would the project create 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. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant impact to hazards and hazardous materials if:

- A Project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- A Project involved the creation of any health hazard or potential health hazard.

The Project Site is currently developed as a 16,854-square-foot building that was built in 1959,[25] currently used as the United States Post Office—Dosan Ahn Chang Ho Station and a gated surface parking lot. Because of the age of the existing structure that would be removed, it is possible that asbestos, lead-based paint, and/or other hazardous materials could be present. Furthermore, it is possible that the soil could be contaminated from previous uses that possibly occupied the site prior to the present structure. Based on the age of the structure and possible unknown previous use of the Project Site, it is possible that potential hazardous conditions exist. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

[25] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, 6751 W.6th Street, website: http://zimas.lacity.org, accessed December 14, 2016.*

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant impact to hazards and hazardous materials if emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There are no schools located within a 0.25-mile radius of the Project Site. RFK Community Schools are located approximately 0.3 mile southeast of the Project Site at 3201 W. 8th Street. In addition, Young Oak Kim Academy is located approximately 0.7 mile east of the Project Site at 615 S. Shatto Place. As discussed above, construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. The storage and handling of these materials would be managed in accordance with applicable state and federal laws for safe handling of hazardous substances, which include developing Project-specific hazardous materials management and spill control plans, storing incompatible hazardous materials separately, using secondary containment for hazardous materials storage, requiring the contractor to use trained personnel for hazardous materials handling, and keeping spill clean-up kits available on-site. As such, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant and no mitigation measures would be required. No further analysis of this issue is required.

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

Potentially Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. As discussed above, the Project Site is currently developed as a 16,854-square-foot building that was built in 1959. Based on the age of the structure and possible unknown previous use of the Project Site, it is possible that potential hazardous conditions exist. The applicable hazardous materials lists will be reviewed during the preparation of the EIR. A Phase I Environmental Site Assessment will be prepared for the Project. The Phase I will include information describing past uses on the site, the status of regulatory listings related to the Project Site, current conditions on the site related to hazardous materials, and recommend mitigation measures as required for the handling of hazardous materials. Impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?

No Impact. A significant impact may occur if a Project is located within a public airport land use plan area, or within 2 miles of a public airport, and subject to a safety hazard. The closest public airports to the Project Site are the Santa Monica Airport (approximately 9 miles) and the Los Angeles International

Airport (LAX) (approximately 9.5 miles). However, these airports are not located within 2 miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area.[26] Based on the above, development of the Project would not have the potential to exacerbate current environmental conditions to result in a safety hazard for people residing or working the Project area. Therefore, no impact would occur and further analysis of this issue is not required.

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

No Impact. This question would apply to a Project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. Based on the above, development of the Project would not have the potential to exacerbate current environmental conditions to result in a safety hazard for people residing or working the Project area. Therefore, no impact would occur and further analysis of this issue is not required.

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant impact to hazards and hazardous materials if a Project involved possible interference with an emergency response plan or emergency evacuation plan. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the degree to which a Project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences. According to the Safety Element of the City of Los Angeles General Plan, the Project Site is not located along a designated disaster route.[27] The nearest disaster routes are Wilshire Boulevard, approximately 0.13 mile to the south, and Western Avenue, approximately 0.25 mile to the west. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary on W. 6th Street and/or S. Harvard Boulevard, both directions of travel would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Further, emergency access and construction management will be addressed in Transportation/Traffic section of the EIR (refer to Section XVI.,(e) Transportation/Traffic of this Initial Study).

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and would not impede emergency access within the Project vicinity. Furthermore, as set forth above, the nearest designated disaster routes are 0.13 mile and 0.25 mile from the Project Site. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts would be

[26] *Ibid.*

[27] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems, Adopted November 1996.*

less than significant and no mitigation measures would be required. Further analysis of this issue is not required.

h) Would the project exacerbate existing environmental conditions so as to increase the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if the Project Site is located in proximity to wildland areas and poses a significant fire hazard, which could affect persons or structures in the areas in the event of a fire.

The Project Site is located in an urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Fire High Fire Hazard Severity Zone,[28] nor is the Project Site or surrounding area within a wildland fire hazard area.[29] The Project would include installation of fire sprinkler alarm systems that would be connected to a supervised National Fire Protection Agency (NFPA)-13 automatic fire sprinkler system and would include irrigated landscaped areas. Based on the above, development of the Project would not have the potential to exacerbate existing environmental conditions so as to increase the potential to expose people or structures to significant risk of loss, injury, or death involving wildland fires. Therefore, no impacts from wildland fires would occur and further analysis of this issue is not required.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to hazards and hazardous materials may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

IX. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant impact on surface water quality if discharges associated with a Project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a Project would discharge water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a Project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

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[28] City of Los Angeles Department of Planning, Zone Information and Map Access System, *3751 W. 6th Street. Website accessed December 14, 2016.*

[29] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Safety Element Exhibit D Select Wildfire Hazard Areas in the City of Los Angeles, May 1995.*

The Los Angeles Regional Water Quality Control Board (LARWQCB) issued Waste Discharge Requirements for Municipal Stormwater and Urban Runoff Discharges (NPDES Permit No. CAS004001), which requires new development and redevelopment Projects to incorporate stormwater mitigation measures. Depending on the type of Project, either a SUSMP or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves a Project Site.

In addition to the SUSMP, the City institutionalized the use of Low Impact Development (LID) techniques for development and redevelopment Projects. In October 2011, the City adopted the Stormwater LID Ordinance (Ordinance No. 181899) with the stated purpose of:

- Requiring the use of LID standards and practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff;
- Reducing stormwater/urban runoff while improving water quality;
- Promoting rainwater harvesting;
- Reducing off-site runoff and providing increased groundwater recharge;
- Reducing erosion and hydrologic impacts downstream; and
- Enhancing the recreational and aesthetic values in our communities.

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily stormwater) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Operation of the Project also has the potential to degrade water quality and/or waste discharge requirements. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

b) Would the project 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)?

Potentially Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a Project would normally have a significant impact on groundwater level if it would:

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

Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. The City also imports the majority of its potable water supply

from sources outside the Los Angeles Basin. Though the Project will not extract groundwater or propose the use of any wells, potential impacts to groundwater resources and supply that are due to development of the Project should be further evaluated. As such, potential impacts to this topic will be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if a Project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the Project.

While a stream or river does not traverse the site, and the site is fully developed with impermeable surfaces and drains storm flows to the public right-of-way, redevelopment of the Project Site may alter the existing drainage pattern. Moreover, during grading and excavation activities, soil could be exposed and erosion could occur. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a Project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

While a stream or river does not traverse the site, and the site is fully developed with impermeable surfaces and current surface hydrology drains to the public right-of-way, redevelopment of the Project Site may alter the existing drainage pattern. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a Project would normally have a significant impact on surface water quality if discharges associated with a Project would create pollution, contamination, or nuisance as defined in the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, as the site is fully developed with impermeable surfaces and current surface hydrology drains to the public right-of-way, the volume of runoff is unlikely to increase. However, a significant impact may occur if the Project would substantially increase the probability that polluted runoff would reach the storm drain system.

Development of the Project may increase the probability that polluted runoff would reach the storm drain system. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

f) Would the project otherwise substantially degrade water quality?

Potentially Significant Impact. A significant impact may occur if a Project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily stormwater) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Operation of the Project also has the potential to degrade water quality. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

g) Would the project 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?

No Impact. A significant impact would occur only if a Project would place housing within a 100-year flood zone. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X—Other Areas, which is a designation for areas determined to be outside the 100-year flood hazard area.[30] Therefore, no impact would occur, and further analysis of this issue is not required.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if a Project were located within a 100-year flood zone, which would impede or redirect flood flows. As mentioned in Section X(g), above, the Project Site is not in an area designated as a 100-year flood hazard area.[31] The Project Site is located in an urbanized area and would not have the potential to impede or redirect floodwater flows. No impact would occur and further analysis of this issue is not required.

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

Less Than Significant Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure. The Project Site is not located within a dam inundation area, but it is situated between inundation areas for Hollywood Reservoir and Silver Lake Reservoir.[32] Nevertheless, these areas (including all dams and levees), as with other reservoirs and dams in California, are continually monitored by various governmental agencies (such as the State of California Division of

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[30] *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1610F, effective September 26, 2008, website: http://msc.fema.gov/portal, accessed: December 14, 2016.*

[31] Ibid.

[32] *City of Los Angeles Department of Planning, Zone Information and Map Access System, 3751 W.6th Street and City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Safety Element Exhibit G: Inundation & Tsunami Hazard Areas in the City of Los Angeles, May 1995. Website: http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed December 14, 2016.*

Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam and reservoir failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams and reservoirs are intended to ensure that all dams and reservoirs are capable of withstanding the maximum credible earthquake for the site. Therefore, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the development of the Project. As mentioned in Sections IX(g) and IX(h), the Project Site is not in an area designated a 100-year flood hazard area.[33] Therefore impacts would be less than significant and no mitigation measures are required. Further analysis of this issue is not required.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The Project Site is not within an area potentially impacted by a tsunami because the Project Site is approximately 11 miles northeast from the nearest shoreline.[34] There are also no major water bodies in the vicinity of the Project Site that would put the site at risk of inundation by seiche other than the Hollywood Reservoir or Silver Lake Reservoir. The Project is not located adjacent to the Hollywood Reservoir in which a seiche could cause damage. Furthermore, the Project Site is located within a heavily developed area of the City where little open space exists. The Project Site is relatively flat and is not located adjacent to a hillside area; thus, the potential for mudflows to impact the Project Site would be highly unlikely. Therefore, no impact would occur, and further analysis of this issue is not required.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to hydrology and water quality may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

X. LAND USE AND PLANNING

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a Project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a Project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;

[33] Ibid.
[34] *Ibid.*

- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed Project.

The Project Site is located in an urbanized area. The Project Site currently consists of a single-story commercial building and surface parking lot and is immediately surrounded by multi-family residential buildings to the north, a vacant lot to the west, W. 6th Street to the south, and S. Harvard Boulevard to the west. Additional multi-family residential uses are located along S. Harvard Boulevard and Hobart Boulevard north of the Project Site. A multi-story commercial building is situated immediately east at S. Harvard Boulevard and W.6th Street, and a multi-level parking structure is situated across the Site along W.6th Street. In addition, all proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, 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 would be less than significant and no mitigation measures would be required. Further analysis of this topic is not required.

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

Potentially Significant Impact. A significant impact may occur if the Project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site;
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;

The Project Site is located in the Wilshire Community Plan, which is one of 35 community plans that collectively comprise the Land Use Element of the General Plan. The Wilshire Community Plan guides land uses on the Project Site and in the surrounding areas. The Project Site is located on two separate zones—one residential and the second commercial. The southern two lots are zoned C2-1, and have a Neighborhood Office Commercial General Plan land use designation. The northern two lots are zoned R4-2 and have a High Medium Residential General Plan land use designation. A General Plan Amendment from High Medium Residential and Neighborhood Office Commercial to Regional Center Commercial and a Vesting Zone Change and Height District Change from R4-2 and C2-1 to C2-2 is proposed to permit the approximately 175,000 square feet of total floor area proposed for the new building. Based on the site area of 34,435 square feet, the floor-to-area ratio (FAR) for the Project Site

would be5.1:1.[35] Project consistency with applicable Policies of the Wilshire Community Plan will be discussed in an EIR.

The Project Site is located within the Wilshire Center/Koreatown Redevelopment Project Area. The Redevelopment Plan sets forth an array of goals promoting business retention and expansion, attracting new businesses and developing public improvements. The applicable goals and a consistency analysis of the Redevelopment Plan will be discussed in an EIR.

The City has three State Enterprise Zones (SEZ); Los Angeles-Hollywood; East Los Angeles; and Harbor Gateway Communities. The Project Site is located in the Los Angeles-Hollywood Enterprise Zone. The Project and its relationship to Los Angele-Hollywood SEZ will be discussed in an EIR.

The Project is located within a TPA according to ZI 2452 with proximity to two Metro Stations - Wilshire and Western Station (within one-third of a mile) and Wilshire and Normandie Station (within one-quarter of a mile) and situated along 6th Street with Metro Bus Line 18 serving 6th Street with numerous bus lines, as well as qualifying as an infill site.

The Project would require additional approvals, including; conditional use permit for hotel use within 500 feet of an R zone, and for the sales and/or dispensing of alcoholic beverages; site plan review; vesting tentative tract map for air lots for separate retail and one ground lot request which encompasses the entire lot, office and hotel uses; and other discretionary and ministerial permits and approvals that may be deemed necessary. The consistency of the Project with the applicable policies of each of the aforementioned plans will be identified and discussed in an EIR.

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

No Impact. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a Project-related significant adverse effect could occur if the Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. The Project Site is located in an urbanized area of the City of Los Angeles and is developed with a 16,854-square-foot commercial building and surface parking lot. As such, the Project Site does not support any habitat or natural community. Accordingly, no habitat 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 would occur and no mitigation measures would be required. Further analysis of this issue is not required.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to consistency with land use and planning may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

[35] *Building area divided by Project Site total (square feet); 175,000 sf / 34,435 sf = 5.08 (round to 5.1).*

XI. MINERAL RESOURCES

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

No Impact. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally important mineral resource, or if the Project development would convert an existing or future regionally important mineral extraction use to another use, or if the Project development would affect access to a site used or potentially available for regionally important mineral resource extraction. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the Project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is fully developed with a building and surface parking lot and no oil wells are present on the Project Site.[36] According to the Los Angeles City General Plan Safety Element Exhibit E, Oil Field and Oil Drilling Areas,[37] the Project Site is not located within the boundary of any State-designated oil fields or major drilling areas. Additionally, according to the City General Plan Conservation Element Exhibit A,[38] the Project Site is not located within a mineral resources zone. The Project would not involve mineral extraction activities, nor are any such activities presently occurring on or in the vicinity of the Project Site. Therefore, there would be no impact to the loss of availability of a mineral resource and further analysis of this issue is not required.

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

No Impact. The Project Site is currently zoned R4-2 and C2-1 as a land use designation of High Medium Residential and Neighborhood Office Commercial and is not designated for mineral extraction uses. There are no oil extraction operations and drilling or mining of mineral resources at the Project Site. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, no impact associated with mineral resources would occur and further analysis of this issue is not required.

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[36] *City of Los Angeles Department of Planning, Zone Information and Map Access System, 3751 6th Street and 547 S. Harvard Boulevard.*

[37] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Safety Element Exhibit E: Oil Field and Drilling Areas in the City of Los Angeles, May 1995. City of Los Angeles General Plan Safety Element. http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed December 7, 2016.*

[38] *City of Los Angeles Conservation Element, Exhibit A Mineral Resources. Website: http://planning.lacity.org/cwd/gnlpln/consvelt.pdf. Accessed December 7, 2016.*

Cumulative Impacts

No Impact. As discussed above, the Project would not have significant impacts on mineral resources. It is not known if any related Projects would result in the loss of availability of known mineral resources. Regardless, because the Project would have no incremental contribution to the potential cumulative impact on mineral resources, the Project would have no cumulative impact on such resources.

XII. NOISE

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

Potentially Significant Impact. A significant impact may occur where a Project would not comply with the City of Los Angeles General Plan Land Use Compatibility Standards for Noise or the City of Los Angeles Noise Ordinance (Municipal Code Ordinance No. 144,331).

Construction of the Project would require the use of heavy equipment for demolition, grading, excavation and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. Upon completion and operation of the Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed for the new structures.

Therefore, implementation of the Project has the potential to result in an increase in ambient noise levels during both construction and operation. The EIR will describe the existing noise environment, and the potential increases in the Project area from construction equipment including peak estimated construction noise levels that could occur at the nearest sensitive uses during construction of the Project, and from operation of the Project including noise created by on-site equipment or increase in traffic, as well as noise generated from the second level deck facing W. 6th Street, the second level courtyard and the tenth level roof deck terraces. This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and in the U.S. is referenced as vibration decibels (VdB).

The Project proposes a mixed use development with hotel, residential and commercial uses. Therefore, operation of the Project, including use of the parking garage by vehicles, is not anticipated to result in the creation of vibration. However, construction activities for the Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminishes in intensity with distance from the source. The EIR will describe the existing vibration environment and estimate vibration created by Project construction. The City of Los Angeles has not adopted any thresholds for groundborne vibration impacts. Therefore, the analysis will use the Federal Railway Administration's vibration impact thresholds for sensitive buildings

and human annoyance to evaluate the vibration created during construction. This potential impact from construction shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if the Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project. Based upon the criteria established in the City of Los Angeles' *Draft L.A. CEQA Thresholds Guide*, a Project would typically have a significant impact on noise levels from Project operations if the Project would increase the ambient noise levels by 3 dBA CNEL at the property line of homes where the resulting noise level would be at least 70 dBA CNEL or at the property line of commercial buildings where the resulting noise level is at least 75 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact.

The Project proposes the demolition of a one-story commercial building and surface parking lot, and construction of hotel, residential, and ground level commercial uses. The Project would include the operation of HVAC systems, vehicles in the parking garage, an outdoor pool, and outdoor courtyards. Operation of the Project has the potential to generate a permanent increase in noise in the Project vicinity. The EIR will describe the existing noise environment and estimate the increase in noise that would be potentially created by Project operation. This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if the Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Project. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant impact noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA [CNEL] or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA [CNEL] or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5dBA [CNEL] at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.

The Project proposes the demolition of a surface parking lot and building, and construction of hotel, residential, and ground level commercial uses. The Project would include the operation of HVAC systems, vehicles in the parking garage, an outdoor pool, and outdoor courtyards. Operation of the Project has the potential to generate a permanent increase in noise in the Project vicinity. The EIR will describe the existing noise environment and estimate the increase in noise that would be potentially created by Project operation. This potential impact shall be evaluated in an EIR.

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

No Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the Project increases ambient noise levels by 1.5 dBA CNEL or greater.

The closest public airports to the Project Site are Santa Monica Airport (approximately 9 miles), and the Los Angeles International Airport (LAX) (approximately 9.5 miles). Thus, the Project Site is not located within 2 miles of a public airport; furthermore, the Project Site is not in an airport land use plan area.[39]. Therefore, no impact would occur and further analysis of this issue is not 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater. This question would apply to a project only if the project site were in the vicinity of a private airstrip and would subject area residents and workers to substantial noise levels from aircraft operations. As discussed in response to Section IX(f), above, the Project Site is not located in the vicinity of a private airstrip.. Therefore, no impact would occur, and further analysis of this issue is not required.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to noise may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

XIII. POPULATION AND HOUSING

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

Potentially Significant Impact. A significant impact may occur if a Project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude.

The Project would be located on a previously developed site in the City, surrounded by existing development. The Project would be considered as infill development and would connect to existing roadways and utility infrastructure. The Project would construct up to 44 multi-family units at a site that currently consists of a 16,854-square-foot commercial building used as a U.S. Post Office and surface

[39] *City of Los Angeles Department of Planning, Zone Information and Map Access System, 3751 W.6th Street. Los Angeles County Airport Land Use Plan, Los Angeles Airport Land Use Commission, Department of Regional Planning, December 1, 2004. Website: http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf. Accessed December 15, 2016.*

parking lot. According to the City of Los Angeles Department of City Planning, the most recent estimated household size for multi-family housing units in the Wilshire Community Pan Area is 2.31 persons per unit[40]. Thus, the Project could generate approximately 102 residents on-site as well as employees at the proposed commercial retail use and restaurant/café use. Thus, the Project would result in an increase in population on the site. The Project Site is within the jurisdiction of SCAG, which has prepared a Regional Comprehensive Plan and Guide (RCPG) to serve as a framework for decision-making with respect to regional growth and through its Growth Management policies addresses land use and population growth within a broader context. The EIR will consider whether in light of the RCPG, it would create a substantial increase in population or employment in the area, and whether these increases are within the anticipated SCAG forecast for population and employment. This potential impact shall be evaluated in an EIR.

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

No Impact. A significant impact may occur if a Project would result in the displacement of existing housing, necessitating construction of replacement housing elsewhere. The Project would construct up to 44 multi-family units at a site that currently consists of a 16,854-square-foot commercial building used as a U.S. Post Office and surface parking lot. The Project Site does not contain any existing housing; therefore, development of the Project would not displace any existing housing and would not require construction of replacement housing. No impact would occur and no mitigation measures are required. Further analysis of this issue is not required.

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

No Impact. A significant impact may occur if a Project would result in the displacement of existing residents, necessitating the construction of replacement housing elsewhere. The Project would construct up to 44 multi-family units at a site that currently consists of a 16,854-square-foot commercial building used as a U.S. Post Office and surface parking lot. Based on the existing on-site uses, there are no residents living on the Project Site. Therefore, no people would be displaced by the Project and no impact would occur and further analysis of this issue is not required.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to population and housing may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

XIV. PUBLIC SERVICES

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

[40] *City of Los Angeles, City Planning Department, Demographics Unit, Jack Tsao, Email Communication, April 25, 2017.*

a) Fire protection?

Potentially Significant Impact. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a Project adequate if a Project is within the maximum response distance for the land use proposed. Pursuant to Section 57.507.3.3 of the LAMC, the maximum response distance between residential land uses and an LAFD fire station that houses an engine or truck company is 1.5 or 2 miles. Because the Project would result in an increased number of residents on the Project Site, it could result in greater demand on LAFD fire protection and emergency services. The EIR will describe existing LAFD response times and capacity and will analyze the Project's potential to create impact to fire protection and emergency services. This potential impact shall be evaluated in an EIR.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to fire protection may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

b) Police protection?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a Project, necessitating a new or physically altered station. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the Project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from the proposed Project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of Project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the Project's proportional contribution to the demand; and
- Whether the Project includes security and/or design features that would reduce the demand for police services.

The Project would construct approximately 44 multi-family residences, up to 200 hotel rooms, and approximately 18,000 square feet of commercial retail and restaurant uses, at a site currently consisting of a 16,854-square-foot commercial building and surface parking lot. As discussed above, the Project could potentially generate approximately 107 residents on-site as well as employees at the proposed hotel and restaurant/retail uses. As the Project would generate a permanent on-site population where there currently is none, the Project would likely increase the number of service calls to LAPD from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to police protection may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

c) Schools?

Potentially Significant Impact. A significant impact may occur if a Project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a Project results in a significant impact on public schools shall be made considering the following factors:

- The population increase resulting from a Project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of Project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and a Project's proportional contribution to the demand;
- Whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether a Project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

As discussed above, the Project could potentially generate approximately 107 residents on-site as well as employees at the proposed hotel and restaurant/retail uses. Some residents are likely to have grade-school-aged children that in turn could generate increased demand on LAUSD schools currently serving the Project Site. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to schools may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

d) Parks?

Potentially Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a Project. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a Project results in a significant impact on recreation and parks shall be made considering the following factors:

- The net population increase resulting from a Project;

- The demand for recreation and park services anticipated at the time of Project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and a Project's proportional contribution to the demand; and
- Whether a Project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

As discussed above, the Project could potentially generate approximately 107 residents on-site as well as employees at the proposed hotel and restaurant/retail uses. Consistent with the recommended City of Los Angeles Department of Recreation and Parks strategy to help alleviate the burden on existing park and recreational facilities, the proposed Project would provide recreational amenities and open space for Project residents. However, the Project's future residents would likely increase the use of parks and recreational facilities in the area, some of which may not have the capacity to serve additional residents. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to parks may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

e) Other public facilities?

Potentially Significant Impact. A significant impact may occur if a Project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve a Project Site. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a Project results in a significant impact on libraries shall be made considering the following factors:

- The net population increase resulting from a Project;
- The demand for library services anticipated at the time of Project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the Project's proportional contribution to the demand; and
- Whether a Project includes features that would reduce the demand for library services (e.g., library facilities or direct financial support to the Los Angeles Public Library).

As discussed above, the Project could potentially generate approximately 107 residents on-site as well as employees at the proposed hotel and restaurant/retail uses. The Project-generated residents would result in an increased demand for library materials and would potentially result in the need for new or expanded library facilities. In addition to libraries, roadway improvements and/or dedications may be required by the Bureau of Engineering, the construction of which could have an adverse significant impact. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to other public facilities may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

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. A significant impact may occur if a Project would include substantial employment or population growth that could generate an increased demand for park or recreational facilities that would exceed the capacity of existing parks and causes premature deterioration of the park facilities. As discussed in response to Section XIV(d), above, the Project-generated residents would increase demand for parks and recreational facilities in the area, some of which may not have the capacity to serve additional residents. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if a Project includes the construction or expansion of park facilities, the construction of which would have a significant adverse effect on the environment. The Project includes open spaces and recreational amenities (e.g., pool and spa), the construction of which could have an adverse significant impact. As discussed in Section XIV(d), the Project's future residents would increase the use of parks and recreational facilities in the area, some of which may not have the capacity to serve residents. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to recreation may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

XVI. TRANSPORTATION/TRAFFIC

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

Potentially Significant Impact. A significant impact would occur if the change in traffic volumes at the study area intersections associated with a Project equals or exceeds the thresholds of significance adopted by the City. The Project would require the use of a variety of construction vehicles throughout the Project construction. Typical construction schedules create trips outside of the traffic peak hours. It is anticipated that there would be no hauling during the PM peak hour, and that construction workers

would arrive at the Project Site prior to the AM peak hour, which is typical construction industry practice.

Operation of the Project could generate approximately 107 residents,[41] in addition to hotel visitors, on-site employees and patrons of the commercial spaces, which would result in increased vehicle trips on area roadways that could degrade existing levels of service to failing levels or further exacerbate already-failing roadway facilities. The Project-generated population could also increase the demand for and use of public transit, which may affect the performance of existing transit conditions in the area. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. A significant impact may occur if a Project would cause a substantial change in Congestion Management Program (CMP)-designated surface roads or highways when compared to conditions without the Project. The nearest CMP facility to the Project Site is Wilshire Boulevard, approximately 0.13 mile to the south, Santa Monica Boulevard (SR-2), approximately 1.8 miles to the north, Hollywood Freeway (US Route 101), approximately 1.5 miles to the east and Santa Monica Freeway (I-10), approximately 1.75 miles to the south.[42] The CMP requires that new development Projects analyze potential Project impacts on CMP monitoring locations if an EIR is prepared for the Project. When a CMP analysis is required, the CMP methodology requires the analysis of traffic conditions at all CMP arterial monitoring intersections where a Project would add 50 or more trips during either the AM or PM weekday peak hours. The CMP also requires that traffic studies analyze mainline freeway monitoring locations where a Project would add 150 or more trips in either direction during either AM or PM weekday peak hours. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

No impact. This question would apply to the Project only if it involved an aviation-related use or would influence changes to existing flight paths. The Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin. The closest airports to the Project Site are the Santa Monica Airport (approximately 9 miles), and the Los Angeles International Airport (LAX) (approximately 9.5 miles). Therefore, no impact would occur and further analysis of this issue is not required.

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

No Impact. A significant impact may occur if a Project included new roadway design or introduced a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project Site access or other features were designed in

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[41] *Based on 2.44 persons per unit for the Hollywood Community Plan Area of the City of Los Angeles, 6200 Sunset Boulevard Initial Study, January 2016.*

[42] *Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program, Exhibit 2-3, page 13, website: http://media.metro.net/docs/cmp_final_2010.pdf, accessed: December 15, 2016.*

such a way as to create hazard conditions. The roadways adjacent to the Project Site are part of the urban 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 in the Project vicinity. Thus, no impacts would occur and no mitigation measures would be required. No further analysis of this issue is required.

e) Would the project result in inadequate emergency access?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. While it is expected that construction activities for the Project would primarily be confined on-site, the Project's construction activities would have the potential to cause temporary and intermittent lane closures in adjacent off-site streets (i.e., W.6th Street and S. Harvard Boulevard), for installation or upgrading of local infrastructure. The Project would generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. In addition, as part of the Project, existing site access would be modified. Therefore, further analysis of this topic in an EIR is required.

f) Would the project 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. For the purpose of this Initial Study, a significant impact may occur if the Project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site. There are multiple public transportation opportunities in the Project Site's immediate area. In particular, the Los Angeles County Metropolitan Transportation Authority (Metro) Purple Line Wilshire/Western Metro Station (subway) is located approximately 0.26 mile to the southwest of the Project Site. Additionally, Metro and the Los Angeles Department of Transportation (LADOT) operate numerous bus lines with stops located close to the Project Site. In addition, the Project meets the criteria of ZI 2451 as a Transit Priority Area with its proximity to the Metro subway and bus lines and infill site. The Project proposes new development that has the potential to result in an increased demand for alternative transportation modes. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities is required.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to transportation and traffic may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

XVII. TRIBAL CULTURAL RESOURCES

a) Would the Project be 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)?

Potentially Significant Impact. The Project Site is occupied by a 16,854-square-foot building, currently used as the United States Post Office—Dosan Ahn Chang Ho Station was built in 1959.[43] Thus, based on age, the building could potentially be eligible as a historic resource. However, the building on the Project Site is not listed in the California Register, designated as a local Monument or identified in the SurveyLA report for the Wilshire Community Plan area.[44] Nevertheless, based on the age of the structure, the building is eligible for consideration as an historic resource. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Approved by Governor Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to Projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the Project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As discussed previously, the Project would require excavation a depth of three levels of subterranean parking on the Project Site. 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 will participate in any requested consultations. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to tribal cultural resources may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

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[43] *City of Los Angeles, Department of City Planning, ZIMAS, website: http://zimas.lacity.org, accessed December 13, 2016.*

[44] *SurveyLA, Historic Resources Survey Report, Wilshire Community Plan Area, website: http://preservation.lacity.org/sites/default/files/ARG%20FINAL%20Wilshire%20Report_HPLAEdit.pdf, accessed December 13, 2006*

XVIII. UTILITIES AND SERVICE SYSTEMS

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

Potentially Significant Impact. A significant impact could occur if a Project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency. This checklist question would typically apply to properties served by private sewage disposal systems, such as septic tanks. California Water Code Section 13260 states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

LARWQCB enforces wastewater treatment and discharge requirements for properties in the Project area. The Project would convey wastewater via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). No industrial discharge into the wastewater system would occur. The HTP is a public facility, and, therefore, is subject to the State's wastewater treatment requirements. As such, wastewater from the implementation of the Project would be treated according to the wastewater treatment requirements enforced by LARWQCB. Nevertheless, the Project would result in construction of a new building on-site that is greater in density over existing conditions, which would increase wastewater generation from the Project Site resulting in a potentially significant impact. . Therefore, this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a Project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the Project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for the Project;
- Whether sufficient capacity exists in the water infrastructure that would serve the Project, taking into account the anticipated conditions at Project buildout;
- The amount by which the Project would cause the Projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the Project completion; and
- The degree to which scheduled water infrastructure improvements or Project design features would reduce or offset service impacts.

Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant wastewater impact if:

- The Project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The Project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Project would increase the demand for water and the generation of wastewater and, thus, increase the demand of treatment facilities compared to existing conditions. Therefore, impacts may be potentially significant and this potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new stormwater drainage facilities.

The Project proposes the demolition of a commercial building and surface parking lot, and construction of hotel, apartment, and ground level retail/restaurant uses with up to 44 dwelling units, 200 hotel rooms, and approximately 18,000 square feet of commercial retail/restaurant space. The site is currently connected to the City's storm drain system. The Applicant would be responsible for providing the necessary storm drain infrastructure improvements to connect with the existing drainage system and stormwater runoff from the Project would continue to drain into the existing City storm drain system. The EIR will analyze impacts to storm drainage facilities that the Project would connect to determine if Project stormwater runoff would create a significant impact. This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a Project would increase water consumption to such a degree that new water sources would need to be identified. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the Project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for the Project;
- Whether sufficient capacity exists in the water infrastructure that would serve the Project, taking into account the anticipated conditions at Project buildout;
- The amount by which the Project would cause the Projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the Project completion; and
- The degree to which scheduled water infrastructure improvements or Project design features would reduce or offset service impacts.

The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the Project Site. Water is supplied from three primary sources including water supplied by the Metropolitan Water District's Colorado River and Feather River supplies (53 percent—45 percent from the Bay Delta and 8 percent from the Colorado River), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (34 percent), local San Fernando groundwater (12 percent) and recycled water (1 percent). The EIR will evaluate the Project increase in population against the Department of Water and Power's most current water management plan, which examines water demand based on population and economic growth; existing facilities; conservation regulations, system wide improvements and technology (existing and proposed), and implementation results; existing and proposed water supply; and conclusions on future water supply. This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a Project would normally have a significant wastewater impact if:

- The Project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The Project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. Sewage from the Project Site would be conveyed via sewer infrastructure to the HTP. The EIR will estimate the Project's increase in wastewater generation and analyze the HTP capacity to treat the increase in wastewater. This potential impact shall be evaluated in an EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a Project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the Project results in a significant impact on solid waste shall be made considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the Project, considering proposed design and operational features that could reduce typical waste generation rates;
- Need for additional solid waste collection route, or recycling or disposal facility to adequately handle Project-generated waste; and
- Whether the Project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan

(CiSWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Construction (including demolition) and operation of the Project would result in the generation of demolition materials, construction materials waste, and operational solid waste. The EIR will estimate the Project's contribution of solid waste to the waste stream, including during Project operation. The EIR will analyze the increase in solid waste and the availability of landfills that would serve the Project to accommodate the solid waste. This potential impact shall be evaluated in an EIR.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Potentially Significant Impact. A significant impact may occur if a Project would generate solid waste that was not disposed of in accordance with applicable regulations. The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. In 2001, the City adopted a 70 percent diversion rate goal by the year 2020. During his term of office, Mayor Antonio Villaraigosa revised the diversion rate goal to 75 percent by 2013, and the City adopted a new goal of "Zero Waste" by the year 2025. Los Angeles Bureau of Sanitation's Solid Resources Citywide Recycling Division develops and implements source reduction, recycling, and reuse programs in the City.[45] The EIR will analyze the Project's compliance with federal, state, and local statutes and regulations related to solid waste. This potential impact shall be evaluated in an EIR.

h) Other utilities and service systems – Energy Conservation?

Potentially Significant Impact. The Project would generate an increased demand for electricity and natural gas services provided by LADWP and the Southern California Gas Company, respectively. In accordance with CEQA Guidelines Appendix F, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the EIR.

Cumulative Impacts

Potentially Significant Impact. Cumulative impacts to utilities and service systems may be potentially significant, and, therefore, this issue shall be further evaluated in an EIR.

[45] *Los Angeles Bureau of Sanitation, Construction and Demolition Recycling Guide, website: https://www.lacitysan.org/san/faces/home, accessed: December 7, 2016.*

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?

Potentially Significant Impact. For the purpose of this Initial Study, a significant impact may occur only if a Project would have an identified potentially significant impact for any of the above issues, as discussed in the preceding sections. As discussed previously in Section IV, the Project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed within this Initial Study, the Project could result in impacts with the potential to degrade the quality of the environment related to Air Quality, Cultural Resources, Geology and Soils, Energy Conservation, Hydrology/Water Quality, Hazards and Hazardous Materials, Land Use, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, Tribal Cultural Resources and Utilities. The potential for these cumulative impacts shall be evaluated in an EIR.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when a Project's possible environmental effects, although individually limited, may be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual Project are significant when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.

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

With respect to agricultural and mineral resources, the Project is located in an urbanized area and on previously developed land not zoned for agricultural or mineral extraction uses. There are no sensitive biological resources on the site, and the Project would be located on an urban infill site in an already densely developed area. Therefore, the potential for cumulative impacts to agricultural, mineral, and biological resources would be less than significant and no mitigation measures are required.

With respect to aesthetics, the Project Site is located within a City of Los Angeles Transit Priority Area (TPA). "Transit priority area" means an area within one half mile of a major transit stop that is existing or planned. Public Resources Code (PRC) Section 21099 (d)(1) states that a Project's aesthetic impacts shall not be considered a significant impact on the environment if the Project is a residential, mixed-use residential, or employment center Project, and the Project is located on an infill site within a transit priority area. Since the Project is a mixed-use (with residential) Project, located on an infill site, and is

located within a City TPA, the potential for cumulative impacts to aesthetics would be considered less than significant and no mitigation measures are required.

As discussed within this Initial Study, the Project could result in impacts with the potential to result in cumulatively considerable impacts related to Air Quality, Cultural Resources, Energy Conservation, Geology and Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, Tribal Cultural Resources and Utilities. The potential for cumulatively considerable impacts to these environmental resources shall be evaluated in an EIR.

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

Potentially Significant Impact. As discussed within this Initial Study, the Project could result in impacts with the potential to create substantial adverse effects, either directly or indirectly, related to Air Quality, Cultural Resources, Energy Conservation, Geology and Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, Tribal Cultural Resources and Utilities. The potential for substantial adverse effects on human beings shall be evaluated in an EIR.

V. PREPARERS OF THE INITIAL STUDY

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VI. ACRONYMS & ABBREVIATIONS

AB	Assembly Bill
ARB	California Air Resources Board
ASTM	American Society for Testing Materials
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
APN	Assessor Parcel Number
bgs	Below ground surface
BID	Business Improvement District
BMPs	Best Management Practices
CAPCOA	California Air Pollution Control Officer's Association
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAT	Climate Action Team
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	Methane
CMP	Congestion Management Program
CO_2	Carbon Dioxide
CORTESE	California Hazardous Waste and Substances
cy	Cubic yards
dBA	A-weighted decibel
du	Dwelling unit
EPA	Environmental Protection Agency (see also USEPA)
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
gpd	Gallons per day

GFA	Gross floor area
GHG	Greenhouse gas
gpm	Gallons per minute
HFC	Hydrofluorocarbons
H_2O	Water Vapor
HTP	Hyperion Treatment Plant
IS	Initial Study
LADRP	City of Los Angeles Department of Recreation and Parks
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
lbs	Pounds
LOS	Level of Service
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
mgd	Million gallons per day
MRZ-2	Mineral Resource Zone 2
MTA	Los Angeles County Metropolitan Transit Authority
NAHC	Native American Heritage Commission
N_2O	Nitrous Oxide
NPDES	National Pollution Discharge Elimination System
PFC	Perfluorocarbon
PSI	Pounds per square inch
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Compensation and Recovery Act

RD	Reporting District
ROWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
sf	Square foot
SF_6	Sulfur Hexafluoride
SOPA	Society of Professional Archaeologists
SRA	Source Receptor Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
T-FAR	Transfer of Floor Area
TPA	Transit Priority Area
USEPA	United States Environmental Protection Agency (see also EPA)
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
V/C	Volume/capacity
VOC	Volatile Organic Compound