



## 713 East 5th Street Project

Case Number: ENV-2017-421-EIR

**Project Location:** 713–717½ East 5th Street, Los Angeles, California 90013

**Community Plan Area:** Central City

**Council District:** 14—Huizar

**Project Description:** The Project proposes to develop a new residential building on a 5,506-square-foot (0.13-acre) site located at 713 East 5th Street (Project Site) within the Central City Community Plan Area of the City of Los Angeles (City). The Project includes up to 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units and one manager’s unit, 433 square feet of residential supportive service uses, and one surface parking space. The proposed uses would be located within a new eight-story building comprised of up to 33,007 square feet of floor area, including 433 square feet of residential supportive service uses, and 1,640 square feet of common areas. To accommodate the new uses, the existing 14,475-square-foot, three-story residential building, which contains 46 Very Low Income single room occupancy (SRO) units and one manager’s unit, would be demolished.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

Eyestone Environmental

**APPLICANT:**

Edward Hotel, LP  
c/o Skid Row Housing Trust

June 2018

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# INITIAL STUDY

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## Executive Summary

**Date:** June 1, 2018

**Project Title:** 713 East 5th Street

**Environmental Case Number:** ENV-2017-421-EIR

**Related Cases:** N/A

**Project Location:** 713–717 ½ East 5th Street, Los Angeles, California 90013

**Community Plan Area:** Central City

**Council District:** 14—Huizar

**Lead City Agency:** City of Los Angeles Department of City Planning

**Staff Contact Name and Address:** Jonathan Chang, 221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012

**Phone Number:** (213) 847-3742

**Applicant Name and Address:** Edward Hotel, LP c/o Skid Row Housing Trust, 1317 E. 7th Street, Los Angeles, CA 90021

**Phone Number:** (213) 683-0522

**General Plan Designation:** Light Industrial

**Zoning:** M2-2D

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### PROJECT DESCRIPTION:

The Project proposes to develop a new residential building on a 5,506-square-foot (0.13-acre) site located at 713 East 5th Street (Project Site) within the Central City Community Plan Area of the City of Los Angeles (City). The Project includes up to 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units and one manager's unit, 433 square feet of residential supportive service uses, and one surface parking space. The proposed uses would be located within a new eight-story building comprised of up to 33,007 square feet of floor area, including 433 square feet of residential supportive service uses, and 1,640 square feet of common areas. To accommodate the new uses, the existing 14,475-square-foot, three-story residential building, which contains 46 Very Low Income single room occupancy (SRO) units and one manager's unit, would be demolished.

(For additional detail, see "Attachment A—Project Description.")

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**ENVIRONMENTAL SETTING:**

The Project Site is located at 713–717½ East 5th Street, mid-block on the north side of 5th Street between Towne Avenue to the west and Stanford Avenue to the east, in the Central City Community Plan Area of the City of Los Angeles, approximately 13 miles east of the Pacific Ocean. The Project Site is bounded by East 5th Street to the south, existing residential uses along Stanford Avenue to the east, existing commercial uses along Towne Avenue to the west, and existing warehouse and distribution centers between 4th and 5th Street to the north. An alley is located directly north of the Project Site. Major arterials providing access to the Project Site include Central Avenue, San Pedro Street, Los Angeles Street, 6th Street/Whittier Boulevard, and 4th Street. In addition, the Los Angeles County Metropolitan Transportation Authority (Metro) Gold Line Little Tokyo/Arts District station is located approximately 0.5 mile north of the Project Site.

(For additional detail, see “Attachment A—Project Description.”)

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

Yes. Consultation began on March 21, 2018.

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**Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.):**

N/A

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**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**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.

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- 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.

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

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

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

Jonathan Chang PRINTED NAME	Planning Assistant TITLE
 SIGNATURE	(213) 847-3742 TELEPHONE NUMBER

## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

## **A. Project Description**

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# ATTACHMENT A

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## Project Description

### A. Project Summary

The Project proposes to develop a new residential building on a 5,506-square-foot site (0.13-acre) located at 713 East 5th Street (Project Site) within the Central City Community Plan Area of the City of Los Angeles (City). The Project includes up to 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units<sup>1</sup> and one manager's unit, 433 square feet of residential supportive service uses, and one surface parking space. The proposed uses would be located within a new eight-story building comprised of up to 33,007 square feet of floor area, including 433 square feet of residential supportive service uses,<sup>2</sup> and 1,640 square feet of common areas. To accommodate the new uses, the existing 14,475-square-foot, three-story residential building, which contains 46 Very Low Income single room occupancy (SRO) units and one manager's unit, would be demolished.

### B. Environmental Setting

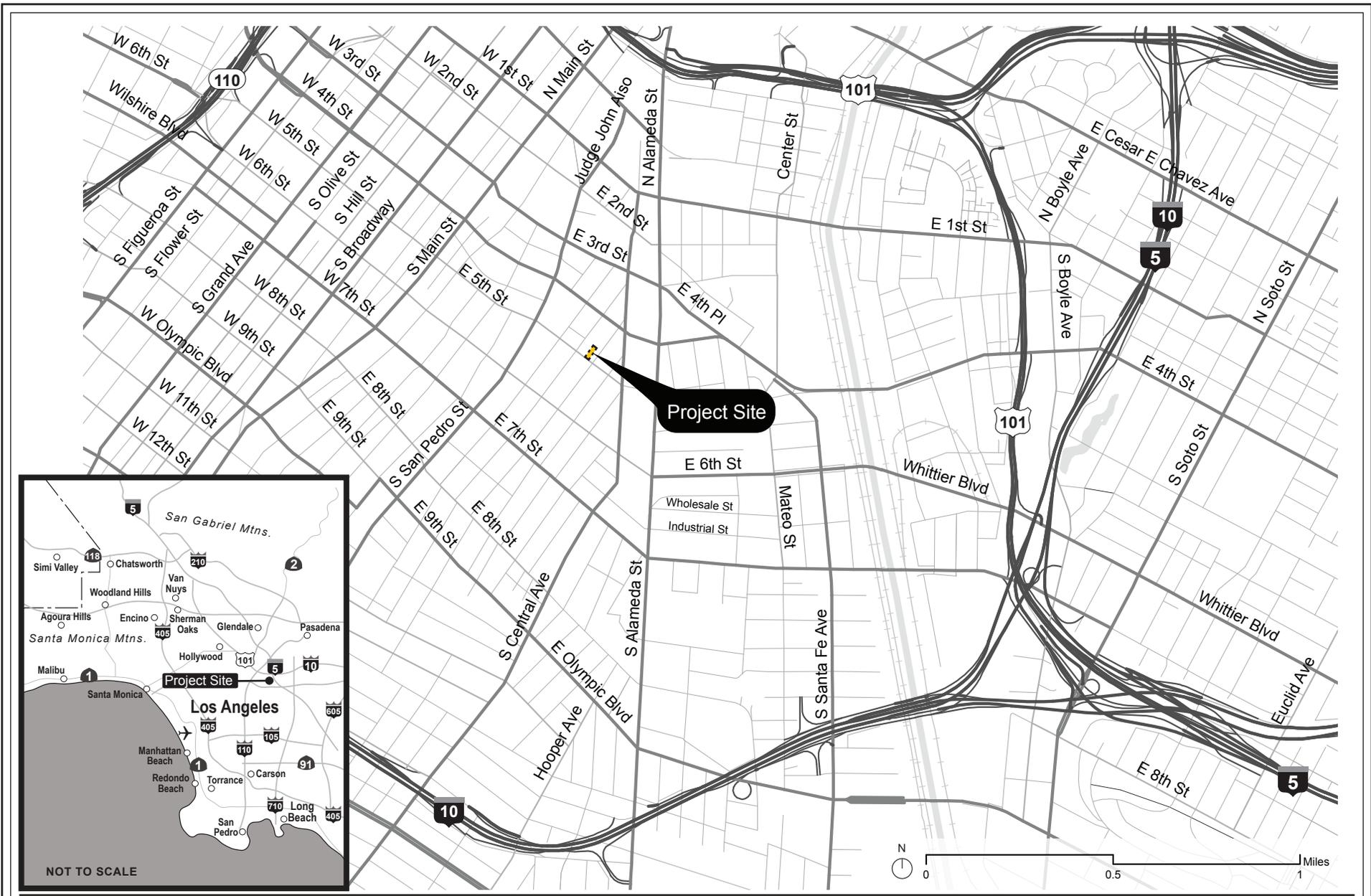
#### 1. Project Location

As shown in Figure A-1 on page A-2, the Project Site is located at 713–717½ East 5th Street, mid-block on the north side of 5th Street between Towne Avenue to the west and Stanford Avenue to the east, in the Central City Community Plan Area of the City of Los Angeles, and approximately 13 miles east of the Pacific Ocean. Primary regional access is provided by the Santa Ana Freeway (U.S. Highway 101 or US-101) to the east and north, the Santa Monica Freeway (Interstate 10 or I-10) to the south, the Golden State Freeway (Interstate 5 or I-5) to the east, and the Harbor Freeway (State Route 110 or SR-110) to the west, which are all accessible within approximately 1.5 miles of the Project Site. The Project Site is bounded by East 5th Street to the south, existing residential uses along Stanford Avenue to the east, existing commercial uses along Towne Avenue to the west, and existing warehouse and distribution centers between 4th and 5th Street to the north. An alley is located directly north of the Project Site. Major arterials providing access to the Project Site

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<sup>1</sup> As defined by Los Angeles Municipal Code (LAMC) Section 12.03, Efficiency Dwelling Units are defined as rooms located within an apartment house or apartment hotel or intended to be used for residential purposes which has a kitchen and living and sleeping quarters combined therein.

<sup>2</sup> These uses include counseling services.



**Figure A-1**  
Project Location Map

Source: Los Angeles County GIS, 2015; Eystone Environmental, 2017.

include Central Avenue, San Pedro Street, Los Angeles Street, 6th Street/Whittier Boulevard, and 4th Street. In addition, the Los Angeles County Metropolitan Transportation Authority (Metro) Gold Line Little Tokyo/Arts District station is located approximately 0.5 mile north of the Project Site. Furthermore, the 7th Street/Metro Center Station is approximately 1.3 miles west of the Project Site and is served by Metro's Red, Purple, Blue, and Expo rail lines, along with the Silver Line limited-stop bus route.

## 2. Existing Uses

### a. Existing Project Site Conditions

As shown in Figure A-2 on page A-4, the Project Site is currently developed with a three-story residential building, totaling 14,475 square feet of floor area, which would be demolished to accommodate the Project. The existing three-story building, also known as the Edward Hotel, contains 46 Very Low Income<sup>3</sup> single room occupancy units and one unit designated for a manager's unit with the residents sharing a community kitchen and restrooms located on each floor. The sizes of the existing units range from 122 to 180 square feet. The manager's unit consists of 433 square feet. The existing building was constructed in the early 1900s as a residential hotel designed for transient lifestyles, and, as a result, there exists limited space, or no dedicated space, for supportive services on-site. The Edward Hotel was identified as a Contributor to the Fifth Street Single-Room Occupancy Hotel Historic District, a potentially eligible historic district.

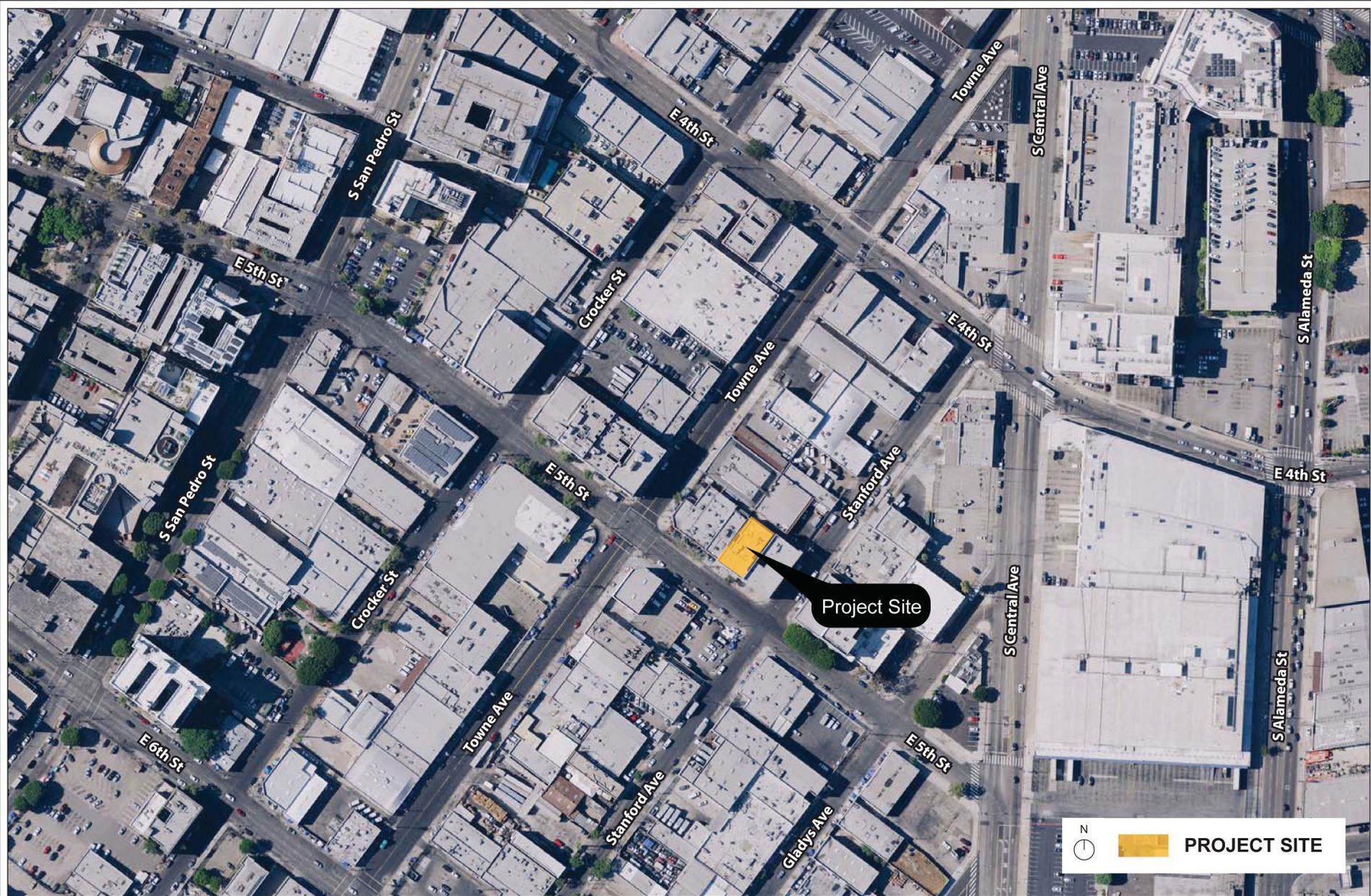
Existing landscaping on the Project Site is limited, with one Callery pear tree located in the public right-of-way in front of the Project Site along 5th Street. Based on the Tree Inventory and Report, provided in Appendix IS-2 of this Initial Study, this existing street tree would be removed to accommodate the development of the Project. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the street tree would be replaced on a 2:1 basis. Removal of the existing street trees in the public right-of-way would occur in accordance with the policies of the Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division. Removal of the existing street tree in the public right-of-way would require approval of the Board of Public Works.

### b. Land Use and Zoning

The Project Site is located within the Central City East District of the Central City Community Plan (Community Plan), adopted in January 2003. The Central City Community Plan is currently being updated. Under the existing adopted Community Plan, the Project Site is designated for Light Industrial land uses. The Project Site is also located within the Central

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<sup>3</sup> Based on affordability levels as set by U.S. Department of Housing and Urban Development (HUD).



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

Industrial Redevelopment Project Area, which designates the Project Site as Industrial. The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as M2-2D (Light Industrial Zone, Height District 2D). The total floor area contained in the building on a lot in Height District No. 2 is limited to six times the buildable area; however, the “D” limitation limits the floor area to a maximum of a 3:1 floor area ratio (FAR) on the Project Site.<sup>4</sup>

The Project would also be consistent with the Greater Downtown Housing Incentive Areas Zoning Information (ZI) File ZI No. 2385 as outlined in LAMC Section 12.22 A.29, including: (1) providing open space, including trees, pursuant to Section 12.21.G reduced by one-half; (2) not providing parking for dwellings units for households earning less than 50 percent Area Medium Income; and, (3) providing no more than one parking space (including space allocated for guest parking) for each dwelling unit.

The Project Site is also within the boundaries of the Central Industrial Redevelopment Project Area, the Greater Downtown Housing Incentive Area, the Residential Hotel Unit Conversion and Demolition Ordinance, the former Los Angeles State Enterprise Zone, and is located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743.<sup>5</sup> With regard to SB 743 [Public Resources Code (PRC) §21099(d)], it 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 TPA shall not be considered significant impacts on the environment.” PRC Section 21099 applies to the Project as the Project is a residential development that meets PRC Section 21099’s definition of an infill site as a lot located within an urban area that has been previously developed. Therefore, as shown in Figure A-3 on page A-6, the Project is located in a TPA pursuant to SB 743 and as defined by the City of Los Angeles Department of City Planning ZI No. 2452.<sup>6</sup> In addition, the Project Site is located within the boundaries of a potentially eligible historic district, which was identified through SurveyLA as the Fifth Street Single Room Occupancy Historic District. The Project Site was identified as a Contributor to the potentially eligible historic district.

### 3. Surrounding Land Uses

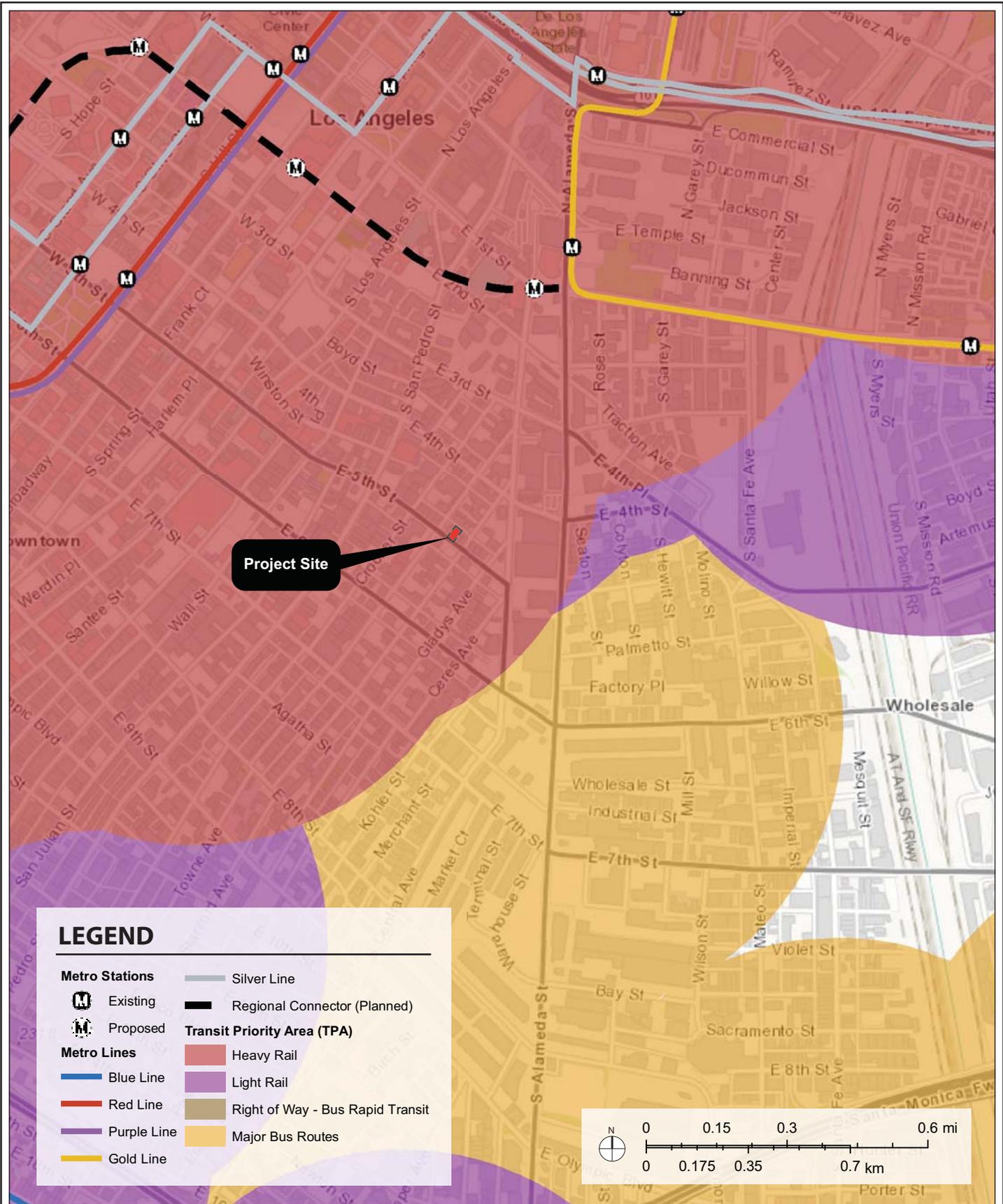
The Project Site is located in a highly urbanized area surrounded by existing and planned development.<sup>7</sup> Surrounding uses in the vicinity of the Project Site include

<sup>4</sup> The existing “D” limitation was adopted pursuant to Ordinance No. 164307 in 1988.

<sup>5</sup> Legislative action resulted in the repeal of the Enterprise Zone Act and the dissolution of Enterprise Zones, effective December 31, 2013 (source: [www.hcd.ca.gov/grants-funding/archive/enterprise-zone.shtml](http://www.hcd.ca.gov/grants-funding/archive/enterprise-zone.shtml)).

<sup>6</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>7</sup> Planned development includes residential, hotel, office, retail, restaurant, and entertainment uses.



**Figure A-3**  
Location of Project Site within a Transit Priority Area

commercial uses to west of and immediately adjacent to the Project Site. The six-story Fred Jordan Mission is located further west of the Project Site across Towne Avenue. Residential uses are located immediately east of the Project Site along Stanford Avenue. Land uses across Stanford Avenue, further east of the Project Site, as well as uses north and south of the Project Site across 5th Street, include warehouse and distribution centers. An alley is located directly north of the Project Site.

## C. Description of the Project

### 1. Project Overview

The Project proposes to develop a new residential building on a 5,506-square-foot (approximately 0.13-acre) site comprised of two parcels located at 713-717½ E. 5th Street in downtown Los Angeles.

As described in more detail below, the Project would provide 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units and one two-bedroom manager's unit, 433 square feet of residential supportive service uses, and one surface parking space. To accommodate the new development, the existing 14,475-square-foot residential building would be demolished.

The proposed uses would be located within an eight-story building containing 33,007 square feet of total floor area, including 433 square feet of residential supportive service uses and 1,640 square feet of common areas. Residential supportive service uses would be located on Floor 2 while common areas would be provided on the ground floor, Floor 2, and Floor 8. The residential units would be located on Floors 2 through 8 and would comprise 30,934 square feet of total floor area. The average size of the dwelling units, which are proposed as efficiency/studio units, would be 420 square feet, while the manager's unit, which is proposed as a two-bedroom unit, would be 815 square feet. The existing residential building to be removed consists of rooms that currently range from 122 to 443 square feet.

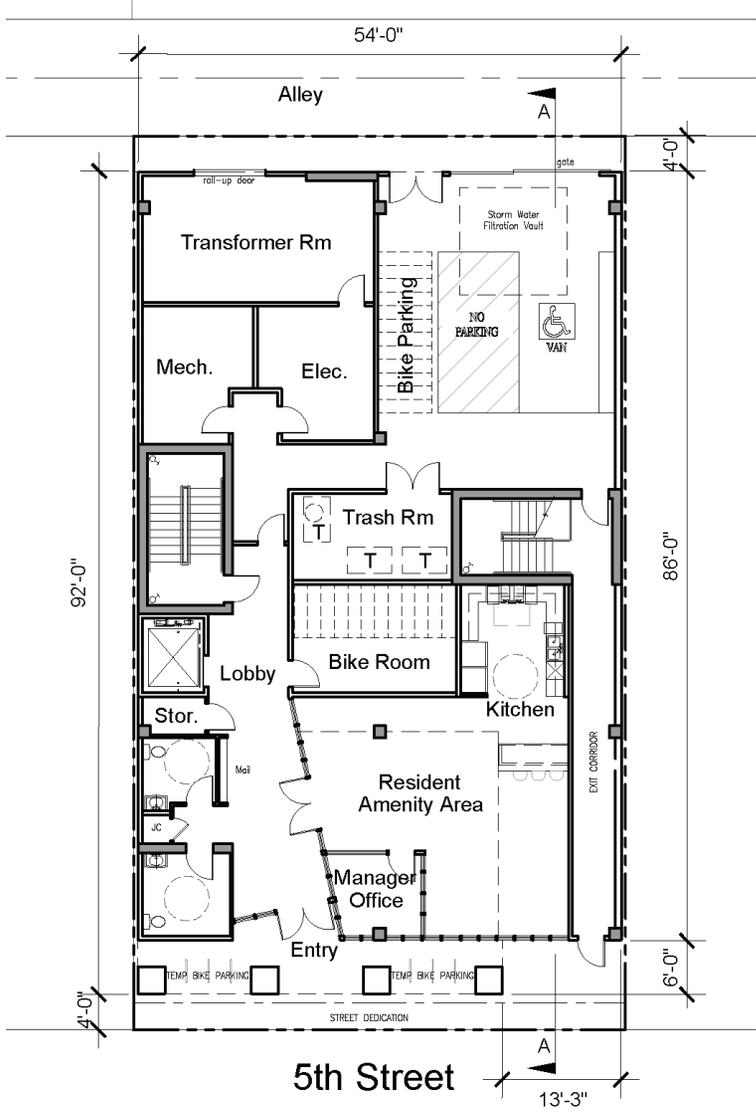
A new residential building is proposed because the current unit sizes and building conditions and layout, as described in Subsection B.2.a above, are not conducive to implement permanent supportive housing best practices to serve residents who may have needs related, but not limited, to homelessness; mental illness; physical disabilities, including combat-related injuries, such as traumatic brain injury; insufficient natural social support system; unemployment; lack of work history; lack of financial literacy; and limited independent living skills. Accordingly, the primary needs of the target population would require supportive services that include, but are not limited to, intensive case management; mental health support and services; addiction/recovery services; employment and/or benefits advocacy; assistance in strengthening independent living skills; and building a more comprehensive natural social support system.

As shown in Figure A-4 on page A-9 the ground floor consists of a residential amenity area and a kitchen for Project residents and guests for larger gatherings, as well as a management office and lobby. Additional ground floor uses include utility rooms for electrical, mechanical, and transformers; a trash room; and storage. There are two stair wells and one elevator that provide access to all the floors. The ground floor would also contain one parking space and the code-required bicycle parking spaces. Floor 2 would contain residential supportive service uses including several small counseling offices for residents, as well as a work center, a residents' lounge, a shared laundry room, and five dwelling units, as shown in Figure A-4. Floors 3 through 7 would have nine dwelling units on each floor. As shown in Figure A-5 on page A-10, each dwelling unit would include living space, a kitchenette, and bathroom. As shown in Figure A-6, on page A-11, Floor 8 would include a roof deck, a flex/community room, and the manager's unit. As also shown in Figure A-6, the roof plan includes various mechanical equipment, such as boilers. The maximum height of the building would be 102 feet, as measured from the lowest point on the Project Site and as illustrated in Figure A-7 on page A-12.

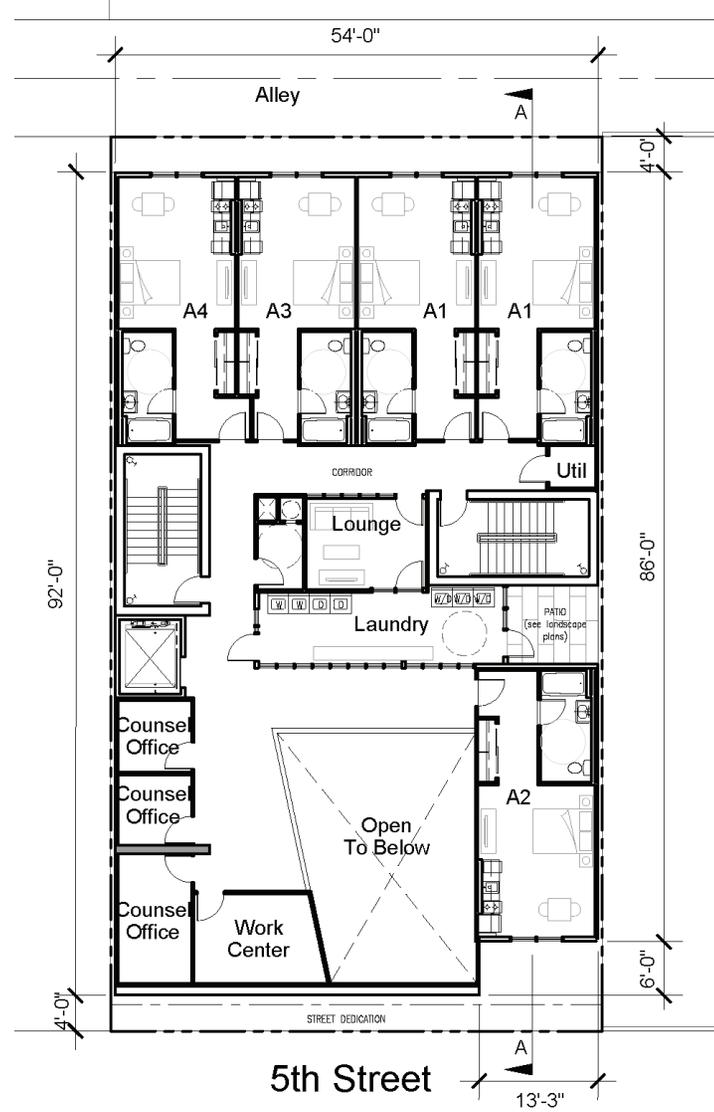
The Project would require a General Plan Amendment to the Central City Community Plan to change the land use designation of the Project Site from Light Industrial to Regional Commercial and a Vesting Zone Change and Height District Change from M2-2D to C2-4D to permit the construction of a new affordable housing project with a FAR of 6:1. With a buildable area of 5,506 square feet, a 6:1 FAR would permit a total of 33,036 square feet of floor area within the Project Site. As set forth above, the Project proposes a floor area of 33,007 square feet. In addition, the Project would require a Site Plan Review in which the Project would request utilization of the floor area bonus system that has been established for projects within the Greater Downtown Housing Incentive Area, including: (1) reduction in open space requirement pursuant to Section 12.21.G by one-half; (2) no parking required for dwelling units for households earning less than 50 percent of the Area Medium Income; and (3) no more than one parking space (including spaces allocated for guest parking) shall be required for each dwelling unit. The Project could take advantage of another incentive offered to projects within the Greater Downtown Housing Incentive Area, which allows for a 35-percent increase in floor area. However, the Project's proposed floor area of 33,007 square feet would be within the permitted FAR of 6:1 under the proposed C2-4D Zone.

## 2. Design and Architecture

The design of the Project is intended to provide a building that is contemporary but evokes the traditional vernacular style of the adjacent buildings. A conceptual rendering of the proposed building is provided in Figure A-8 on page A-13. The façade fronting 5th Street is primarily transparent and set back from the property line to add to the pedestrian experience along 5th Street with planted parkways and colored and permeable concrete pavers.



Ground Floor Plan

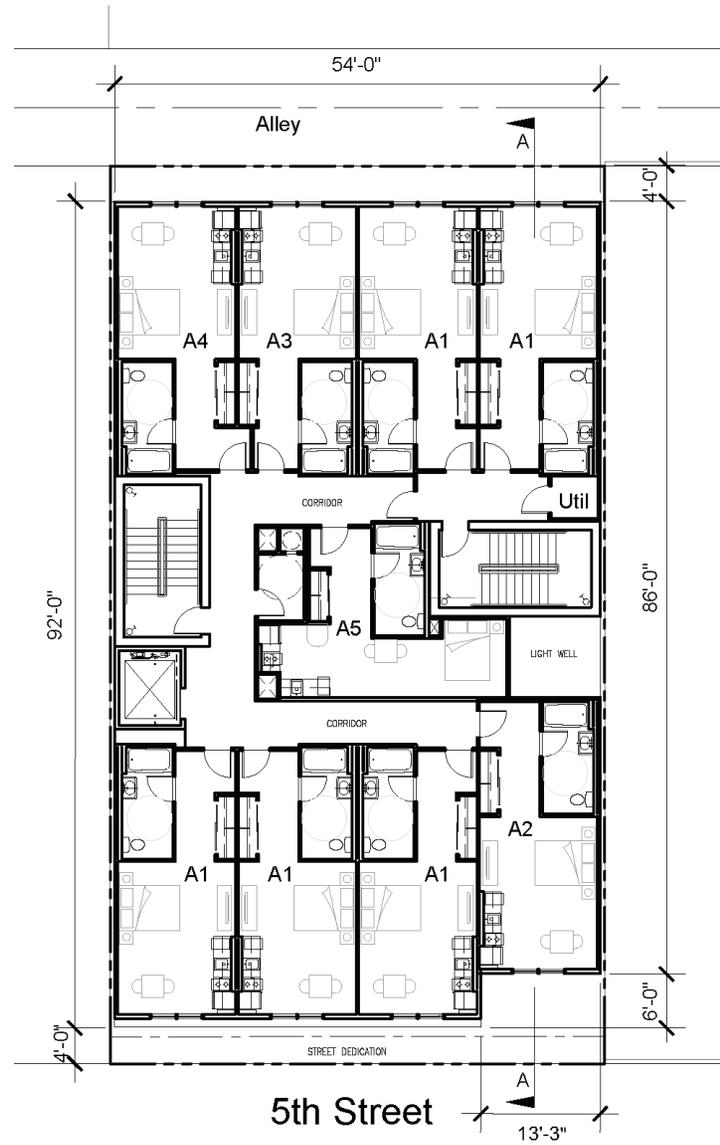


Second Floor Plan

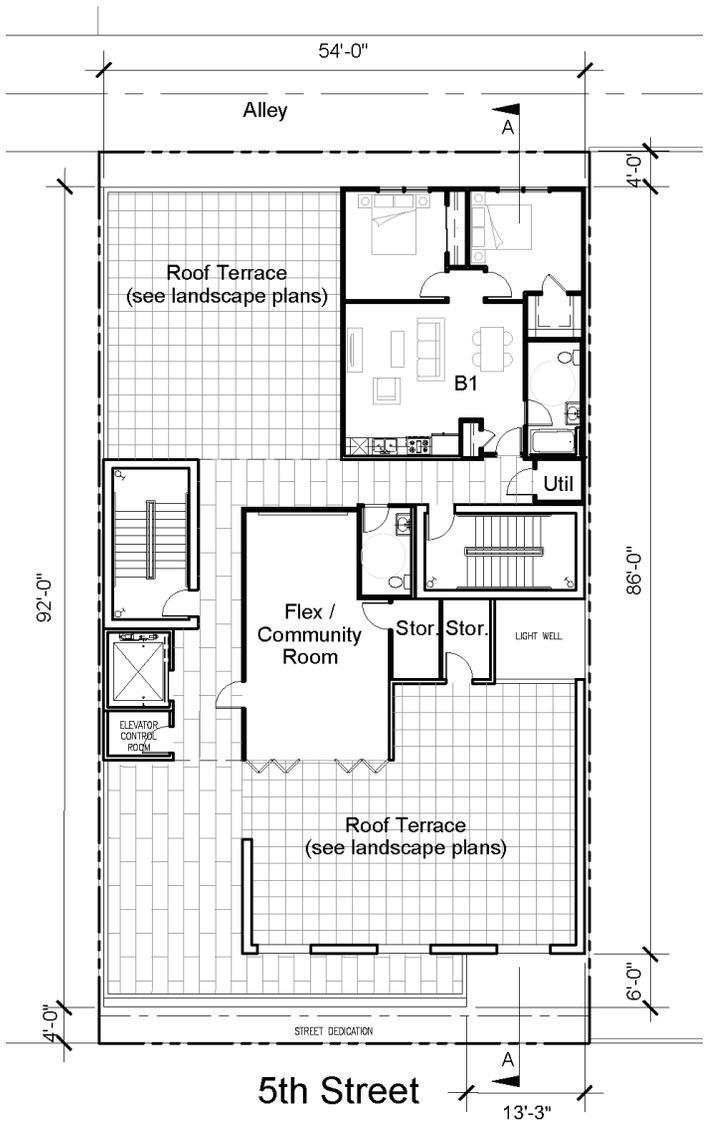
Figure A-4

Ground Floor and Second Floor Plans

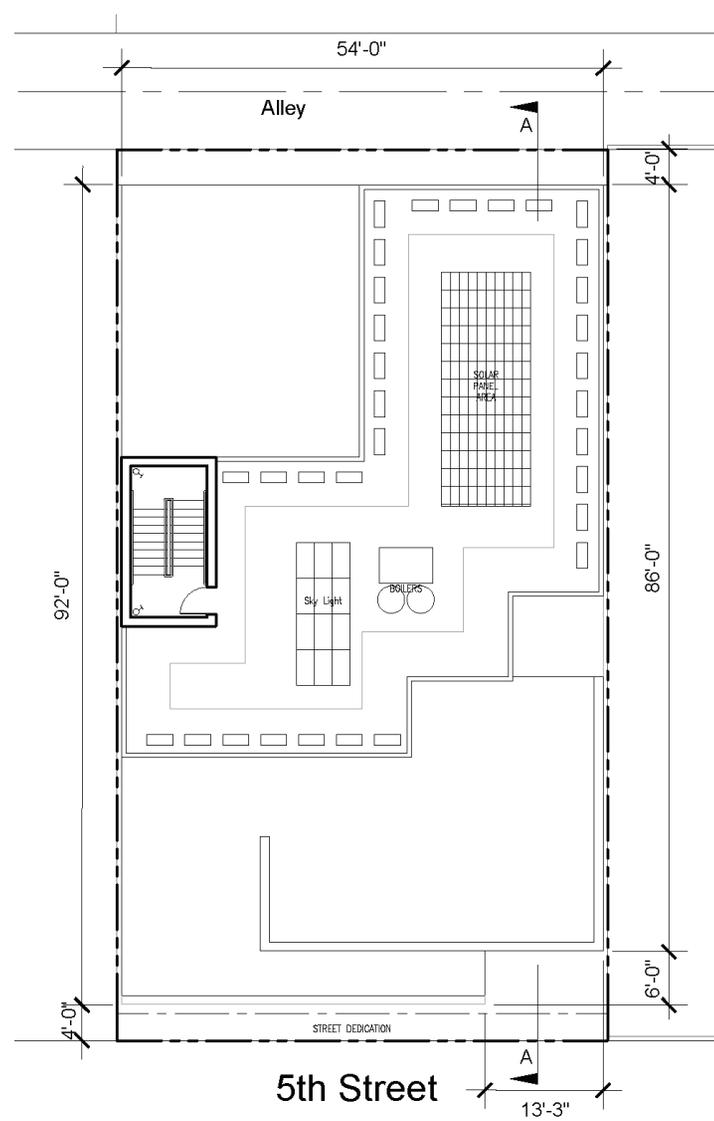
Source: Togawa Smith Martin Residential, Inc., 2017.



**Figure A-5**  
Typical Floor Plan



Eighth Floor Plan



Roof Plan

**Figure A-6**  
Eighth Floor and Roof Plans

Source: Togawa Smith Martin Residential, Inc., 2017.



**Figure A-7**  
Elevations

Source: Togawa Smith Martin Residential, Inc., 2017.



Proposed Building

**Figure A-8**  
Conceptual Rendering

The building's massing would be minimized by differentiating between the first three floors and the floors above with the use of different façade materials and treatments. The proposed maximum building roofline height of 102 feet would be generally consistent with other building heights in the vicinity, including the six-story Fred Jordan Mission (west of the Project Site across Towne Avenue) and the seven-story former Salvation Army Building at 809 E. 5th Street (one block east of the Project Site). The lower three floors would utilize a brick façade to evoke the material and pattern of the existing building and tall glass windows. The brick façade would also be consistent with buildings immediately adjacent to the Project Site and within the surrounding area. Floors 4 through 8 would be designed with metal wall panels and large windows, which would have metal fins or awnings or metal railings to create additional texture to break up the building's massing, as illustrated further in Figure A-7 on page A-12. Building materials would primarily include metal, plaster, glass, and brick.

### 3. Open Space and Landscaping

The Project would provide approximately 2,562.5 square feet of open space, which would consist of 1,282.5 square feet of exterior common open space provided on the roof top and 1,280 square feet of interior common open space. The roof deck would include two outdoor sky terraces, a flex/community room, and various recreational elements, such as a vegetable garden, ping pong tables, outdoor seating, and BBQ area for residents. Floor 2 would also include a small patio for use by the residents. The remaining interior common open space would be provided on the ground floor and include a resident amenity area equipped with a kitchen, and a residents' lounge on Floor 2.

As part of the Project, one Callery Pear tree located in the sidewalk in front of the Project Site along 5th Street would be removed to accommodate the development of the Project. However, two replacement trees and shrubs would be planted on the ground level and in the sidewalk. In addition, the roof deck would be landscaped with a variety of planters, six trees, and a vegetable garden. The landscaping plans for the ground floor and roof deck are illustrated in Figure A-9 on page A-15.

Overall, the Project would provide the required open space as set forth by LAMC Section 12.21-G<sup>8</sup> and the 50-percent reduction provided for projects within the Greater Downtown Housing Incentive Area.

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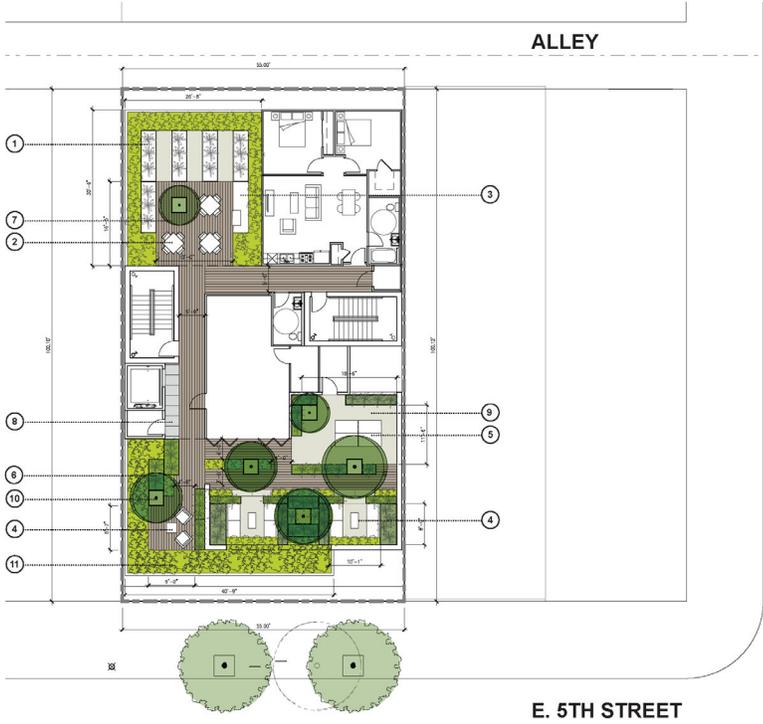
<sup>8</sup> LAMC Section 12.21-G requires the Project to provide 5,125 square feet of open space (i.e., 100 square feet for each unit having less than three habitable rooms and 125 square feet for each unit having three habitable rooms) if no reduction is applied.



**LEGEND**

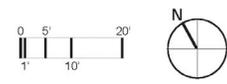
- ① BIKE RACKS
- ② PLANTING
- ③ INTEGRAL COLOR CONCRETE
- ④ PERMEABLE CONCRETE PAVERS
- ⑤ EXISTING STREET TREE REMOVED  
*Pyrus calleryana // Callery Pear Tree*  
DBH=12", below average condition
- ⑥ REPLACEMENT STREET TREE
- ⑦ EXISTING CITY BIKE RACKS
- ⑧ EXISTING STREET LAMP

Ground Floor Landscape Plan



**LEGEND**

- ① RESIDENT VEGETABLE GARDEN
- ② DINING DECK
- ③ BBQ AREA
- ④ OUTDOOR SEATING
- ⑤ MULTI-PURPOSE AREA: PING PONG TABLE + MOVIE NIGHT
- ⑥ FIBERGLASS PLANTERS, VARIOUS HEIGHTS
- ⑦ WOOD DECK OVER PEDESTAL SYSTEM
- ⑧ CONCRETE PAVERS OVER PEDESTAL SYSTEM
- ⑨ DECOMPOSED GRANITE SURFACING
- ⑩ 36" BOX TREE IN FIBERGLASS PLANTER
- ⑪ GREEN ROOF PERIMETER  
FLUSH WITH DECK LEVEL  
MAINTAIN 42" HIGH GUARDRAIL HEIGHT FROM FFL



Roof Deck Landscape Plan

**Figure A-9**  
Ground Floor and Roof Deck Landscape Plans

Source: Togawa Smith Martin Residential, Inc., 2017.

## 4. Access, Circulation, and Parking

As discussed above, the Project would include one parking space, which would be accessed from the alley directly adjacent to and north of the Project Site. There would be no loading dock on the Project Site or other vehicular access to the Project Site. Project residents would access the Project Site from the residential lobby fronting 5th Street. A secondary access point to the proposed building would be provided along the alley by the one parking space.

There are multiple public transportation lines that serve the vicinity of the Project Site. In particular, the Metro Gold Line Little Tokyo/Arts District Station is located approximately 0.5 mile north of the Project Site. Furthermore, the 7th Street/Metro Center Station is approximately 1.3 miles west of the Project Site and is served by Metro's Red, Purple, Blue, and Expo rail lines, along with the Silver Line limited-stop bus route.

Additionally, Metro and Los Angeles Department of Transportation (LADOT) operate numerous bus lines with stops located in close proximity to the Project Site. The Project Site is in close proximity to Metro's express bus system, known as Metro Rapid. The closest Metro Rapid stop to the Project Site is Metro Rapid Bus 720, which affords connections to several Metro Rapid Bus lines in downtown Los Angeles and connections to downtown Santa Monica. Furthermore, the LADOT-operated DASH Route A has its closest stop to the Project Site at 3rd Street and San Pedro Street. The DASH routes provide direct connections throughout downtown Los Angeles.

## 5. Lighting and Signage

The Project would include low-level interior lighting visible through the windows of the residential units, residential supportive service spaces and amenities, and the ground-floor lobby; low-level accent lighting on the proposed building to highlight architectural features and signage; lighting associated with the outdoor patio on Floor 2; low-level lighting on the roof deck at the top level of proposed building; and low-level security, wayfinding lighting and landscape lighting throughout the Project Site.

All exterior lighting would be shielded or directed toward the areas to be illuminated to limit light spillover onto off-site uses and would meet all applicable LAMC lighting standards. As required by Chapter 9, Article 3, Div. 1, Section 93.0117(b) of the LAMC, no exterior light sources and building materials associated with the Project would cause more than two foot-candles of lighting intensity or generate direct glare onto (1) exterior glazed windows or glass doors on any property containing residential units; (2) an elevated habitable porch, deck, or balcony on any property containing residential units; or (3) any ground surface intended for uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. All new street and pedestrian lighting within the public right-of-way will comply with applicable City regulations and would be subject to the approval of the

Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Project signage will include identity signage and directional/wayfinding signs. In general, new signage will be architecturally integrated into the design of the buildings and would establish appropriate identification for the residential uses. Project signage will be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. Exterior lights would be directed onto signs to minimize offsite glare. The Project will not include electronic signage or signs with flashing, mechanical, or strobe lights. In accordance with Chapter 1, Article 4.4, Section 14.4.4-E of the LAMC, illumination used for project signage will be limited to a light intensity of three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

## **6. Site Security**

The entrance and exit points for the proposed building would have controlled access and would only allow admittance to residents and staff. From the entrance, visitors and guests would need to call the Property Management Office for admittance. The Property Management Office would be located at the entrance in order to have direct line of sight to the street and would have a monitor displaying security camera feeds for the entrance of the building, common areas, the public sidewalk in front of the building, and all other cameras on the Project Site. The common areas would be oriented for maximum visibility. Security cameras would be placed at entrances, exits, and common areas, and recordings would be maintained for at least 30 days. A written policy for this Project would be developed regarding the use of the cameras in order to specify who has access to see the videos, who monitors the surveillance, and under what conditions the footage would be released to authorities. Safety lighting will be included to reduce blind spots or dark spaces throughout the building. Furthermore, property management would include a 24-hour hotline for non-emergency matters. In addition to the manager living on-site, the building would be regularly patrolled by security guards under contract with the Project Applicant (Applicant).

## **7. Sustainability Features**

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. The Project proposes to achieve a Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council or satisfy equivalent green building standards. All building systems would meet current Title 24 Energy Standards, and the proposed building would be designed to promote better day lighting and air ventilation. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures

and Energy Star–labeled appliances; reduction of indoor and outdoor water use; weather-based controller and drip irrigation systems; and water-efficient landscape design. In addition, the landscaping on the roof deck would serve to help reduce solar heat gain and stormwater generation on-site. Furthermore, the Project will recycle and reuse building and construction materials to the maximum extent feasible.

#### a. CEQA Guidelines Appendix F

In accordance with CEQA Guidelines Appendix F, the Environmental Impact Report (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. An analysis of the Project's consistency with Appendix F will be provided in the EIR.

## 8. Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing building, followed by grading. Building foundations would then be laid, followed by building construction, and landscape installation. Project construction is anticipated to occur over a 24-month period and be completed in the 3rd or 4th quarter of 2021. Grading would move approximately 740 cubic yards of soil. Specifically, approximately 370 cubic yards of export and 370 cubic yards of import would be required to provide soil conditions appropriate for the required footings and Project foundations during the grading phase.

## D. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. The EIR will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Central City Community Plan to revise the Community Plan land use designation from Light Industrial to Regional Commercial to permit the construction of a new affordable housing project containing a maximum of 51 residential units of which 50 will be set aside as Restricted Affordable Efficiency Dwelling units at a Very Low Income level, and 433 square feet of space for residential supportive services.
- Pursuant to LAMC Section 12.32-F & 12.32-Q, a Vesting Zone Change and Height District Change from M2-2D to C2-4D to permit the construction of a new

affordable housing project containing a maximum of 51 residential units of which 50 will be set aside as Restricted Affordable Efficiency Dwelling units at a Very Low Income level, and 433 square feet of space for supportive services. The height district change from Height District 2D to Height District 4D would allow for a FAR of up to 6:1.

- Pursuant to LAMC Section 16.05, a Site Plan Review.<sup>9</sup>
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, a demolition permit, street tree removal (if required), temporary street closure permits, grading permits, foundation permits, and building permits.

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<sup>9</sup> *The Project is using incentives in the Greater Downtown Housing Incentive Area as follows: reduce open space, including trees, requirement pursuant to Section 12.21.G by one-half; no parking required for dwelling units for households earning less than 50% Area Medium Income; and no more than one parking space (including space allocated for guest parking) shall be required for each dwelling unit.*

## **B. Environmental Checklist**

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# ATTACHMENT B

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## Environmental Checklist

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

### 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.”<sup>1</sup>

As shown in Figure A-3 in Attachment A, of this Initial Study, the Project Site is located within a TPA and, thus, PRC Section 21099 applies to the Project. Therefore, the Project’s aesthetic impacts would not be considered significant. As such, the analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Would the Project:*

**a) Have a substantial adverse effect on a scenic vista?**

**No Impact.** A scenic vista is a public view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can

<sup>1</sup> City of Los Angeles Department of City Planning, Zoning Information File (ZI No. 2452), Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

be wide and extend into the distance, and focal views that focus on a particular object, scene, or feature of interest.

As described in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with an existing 14,475-square-foot residential building, which would be demolished to accommodate the Project. The existing building on the Project Site, also known as the Edward Hotel, is currently occupied by 46 Very Low Income single room occupancy (SRO) units and one manager's unit. In addition, the Project Site is located within the boundaries of a potentially eligible historic district, identified through SurveyLA as the Fifth Street Single Room Occupancy Historic District. The Project Site was identified as a Contributor to the potentially eligible historic district.<sup>2</sup>

Scenic resources within the Project area that are available from public locations include the downtown Los Angeles skyline and Santa Monica Mountains, as well as the Edward Hotel, which was identified as a Contributor to the potentially eligible Fifth Street Single Room Occupancy Historic District. Existing valued views within the greater Project area could include focal views and panoramic views or vistas of identified visual resources. However, such views are limited, partial, distant, and/or non-existent due to the predominantly flat terrain and the dense, intervening development that blocks long-range, expansive views.

Public viewing locations or vantage points in the vicinity of the Project Site include public streets and sidewalks adjacent to the Project Site and in the surrounding area that have existing views of identified valued view resources. In addition, distant public vantage points within the Santa Monica Mountains may provide panoramic views of the Project area.

Public views from vantage points within the area surrounding the Project Site are limited due to urban development with low- and mid-rise structures and flat terrain. Surrounding views consist of the urban landscape occupied by commercial, residential, and warehouse and distribution center uses and structures. Surface parking and loading areas are dispersed throughout the vicinity. Intermittent, pedestrian-level, long-range views of the Santa Monica Mountains are available from segments of some north-south roadways in the area (e.g., Central Avenue). Due to the low-rise nature of the buildings in the area, private views of the Santa Monica Mountains are largely unavailable.<sup>3</sup>

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<sup>2</sup> SurveyLA included the following statement of significance for this area: Significant concentration of early 20th century SRO hotels in Downtown Los Angeles; associated with patterns of multi-family residential development in the areas. SRO hotels were an important multi-family property type in this area of the City.

<sup>3</sup> Private views are not protected under CEQA, but this analysis takes private views into account for disclosure purposes.

Under existing conditions, short-range views of the Project Site are already obstructed from most public vantage points and are generally only available to viewers at adjacent locations (i.e., pedestrians and motorists) along 5th Street, Towne Avenue, and Stanford Avenue and from the immediate uses surrounding the Project Site. Project development would result in a more visible site, particularly as a result of the eight-story building proposed as part of the Project, which would be prominently visible from the surrounding areas. The proposed mid-rise building would result in changes to short-range focal views. Within short-range views from street-level vantage points adjacent to the Project Site, the Project would be prominently visible and would be taller and have more perceived bulk than the existing low-rise structures. The mid-rise building would block public views of other buildings in the vicinity of the Project Site. However, it would not block focal views of visual resources.

Development of the Project would demolish the existing three-story building and construct an eight-story building. The increased height and mass of the proposed building on the Project Site would be visible from more distant locations and could, as a result, intermittently block longer-range views of the downtown Los Angeles skyline and the Santa Monica Mountains. With regard to the downtown skyline, while the proposed building would intermittently block portions of the skyline as viewed from areas east of the Project Site, they would not completely obscure views of the skyline. Furthermore, the proposed building would contribute to the existing fabric of the downtown urban development. With regard to the Santa Monica Mountains, as previously discussed, any such views are very limited and intermittent and are primarily only available from public roadways, not from across the Project Site.

From longer range public viewpoints from the Santa Monica Mountains, the Project, if visible at all, would reflect and be consistent with existing downtown urban development. In general, when long-range views are available from areas within the Santa Monica Mountains, they are typically expansive and panoramic and, therefore, not sensitive to individual development projects (i.e., an individual project alone would not cause an expansive blockage of long-range views from the Hollywood Hills). As such, an individual infill development, similar to the Project, would not block the broader views of the urban landscape from the Santa Monica Mountains.

As discussed in Attachment A, Project Description, of this Initial Study, the Project would remove the Edward Hotel, which was identified as a Contributor to the potentially eligible Fifth Street Single Room Occupancy Historic District and is considered a potentially historical resource and a visual resource. Therefore, its removal is considered the loss of a recognized view.

Based on the analysis above, the Project would eliminate existing views of the Edward Hotel, a potentially historical resource. No other valued views would be eliminated or obstructed by the Project. As discussed in Response to Checklist Question V.a., below, potential impacts to historical resources will be addressed in the Draft EIR. However, Section

21099 of the PRC does not include impacts to historical or cultural resources. **Therefore, the Project's impacts to views and scenic vistas would not be considered significant, and no mitigation measures are required. Thus, no further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 8.8 miles northeast of the Project Site,<sup>4</sup> and the nearest City-designated scenic parkway is along Stadium Way between the I-5 and I-110 Freeways, approximately 2.5 miles north of the Project Site.<sup>5</sup>

Regardless, the Project Site does not include any scenic resources. Specifically, the Project Site is currently developed with an existing 14,475-square-foot residential building, which is currently occupied by 46 Very Low Income SRO units and one manager's unit. As discussed further below, the Project Site does not include protected trees. In addition, the Project Site does not include rock outcroppings, or other natural features. Therefore, the Project would not substantially damage scenic resources, including those located within a state or City-designated scenic highway. As such, the Project would not result in an impact to scenic resources within a scenic highway. As discussed in Response to Checklist Question V.a., below, potential impacts to historical resources will be addressed in the Draft EIR. **Pursuant to SB 743 and ZI No. 2452, the Project's impacts on scenic resources would not be considered significant, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.**

***c) 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 Site is located within the Central City Community Plan Area of the City of Los Angeles, which is highly urbanized and largely built out with low- and mid-rise structures. Relative to surrounding development, the aesthetic environment is characterized by buildings that vary in age, architecture, height, massing, and materials. The Project Site, in particular, is located within the boundaries of a potentially eligible historic district, identified through SurveyLA as the

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<sup>4</sup> California Scenic Highway Mapping System, Los Angeles County, [www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm), accessed November 27, 2017.

<sup>5</sup> Mobility Plan 2035, Map A4, Citywide General Plan Circulation System—Central, Midcity Subarea.

Fifth Street Single Room Occupancy Historic District. As discussed above, the Project Site was identified as a Contributor to the potentially eligible historic district. An analysis of the Project's potential changes to the existing visual character of the Project Site and surrounding area is provided below.

## **Construction**

Construction activities generally cause a temporary contrast to, and disruption in, the general order and aesthetic character of an area. Although temporary in nature, construction activities may cause a visually unappealing quality in a community. During construction activities for the Project, the visual appearance of the Project Site would be altered due the presence of construction equipment. Some of the activity would be visible from roadways adjacent to the Project Site, as well as to viewers within nearby buildings. However, temporary construction fencing will be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level, and graffiti would be removed, as needed, from all temporary walkways and construction fencing throughout the Project construction period.

Visible construction activities would also include truck traffic to and from the Project Site. However, the impact of construction trucking would not significantly impact the visual character of the area, since major roadways are intended to accommodate a range of vehicle types, including trucks incidental to construction and deliveries.

As discussed above, the Project would remove the Edward Hotel, which was identified as a Contributor to the potentially eligible Fifth Street Single Room Occupancy Historic District. Therefore, the Edward Hotel is considered a visual resource for the purposes of this analysis because of its historical significance. Accordingly, the removal of the Edward Hotel would result in the loss of a unique visual resource.

As discussed in Attachment A, Project Description, there is one existing tree located in the sidewalk in front of the Project Site along 5th Street that would be removed to accommodate the development of the Project. The tree is a Callery pear tree and is not identified as one of the trees species that is protected by the LAMC. Thus, the removal of this tree during construction activities would not substantially alter or degrade the existing visual character of the Project area.

Overall, Project construction activities would not substantially alter or degrade the existing visual character or quality of the Project Site and surrounding area, for the following reasons:

- (1) Views of construction activity would be limited in duration and location;
- (2) The Project Site appearance would be typical of construction sites in urban areas;

- (3) Construction would occur within a highly urbanized setting; and
- (4) Construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level.

Based on the above, with the exception of removal of the Edward Hotel, construction activities associated with the Project would not substantially and adversely alter or degrade the existing visual character of the Project Site or introduce elements that substantially detract from the visual character of the Project Site or surrounding area on a permanent basis. However, PRC Section 21099 does not include impacts to historical or cultural resources. As discussed in Response to Checklist Questions V.a., below, potential impacts to historical resources will be addressed in the Draft EIR. **Pursuant to SB 743 and ZI No. 2452, Project impacts to visual character or quality of the Project Site or its surroundings during construction would not be considered significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.**

## Operation

The Project Site is currently developed with one residential building with limited ornamental landscaping. The Project would visually alter the Project Site by replacing the existing three-story Edward Hotel with an eight-story new residential development that would include 51 residential units, as well as residential supportive service uses. The existing Project Site does not include natural open space that would be graded or developed as a result of the Project.

As discussed above, the existing Edward Hotel was identified by SurveyLA as a Contributor to the potentially eligible Fifth Street Single Room Occupancy Historic District. Therefore, the Edward Hotel is considered a visual resource for the purposes of this analysis because of its historical significance. Accordingly, the removal of the Edward Hotel would result in the loss of a unique visual resource.

As shown in the Conceptual Site Plan provided in Figure A-4, Ground Floor and Second Floor Plan, of Attachment A, Project Description, of this Initial Study, the proposed eight-story mid-rise building would occupy the entire Project Site. The proposed mid-rise building is shown in Figure A-8, Conceptual Rendering, of Attachment A, Project Description. The design of the Project is intended to provide a building that is contemporary but evokes the traditional vernacular style of the adjacent buildings. Specifically, the facade fronting 5th Street is primarily transparent and set back from the property line to add to the pedestrian experience along 5th Street with planted parkways and colored and permeable concrete pavers. The building's massing would be minimized by differentiating between the first three floors and the floors above with the use of different facade materials and treatments. The lower three floors would utilize a brick facade to evoke the material and pattern of the existing

building and tall glass windows. Floors 4 through 8 would be designed with metal wall panels and large windows, which would have metal fins or awnings or metal railings to create additional texture to break up the building's massing, as is illustrated further in Figure A-7, Elevations, of Attachment A, Project Description. Building materials would primarily include metal, plaster, glass, and brick.

The Project Site contains minimal landscaping under existing conditions. Specifically, one Callery Pear tree located in the sidewalk in front of the Project Site along 5th Street would be removed to accommodate the development of the Project. However, as shown in Figure A-9, Ground Floor and Roof Deck Landscape Plans, of Attachment A, Project Description, two replacement trees and shrubs would be planted on the ground level and in the sidewalk. In addition, the roof deck would be landscaped with a variety of planters, six trees, and a vegetable garden.

As discussed above, the aesthetic environment of the Project vicinity reflects a multitude of interspersed low- and mid-rise structures occupied by commercial, residential, and warehouse and distribution center uses and associated infrastructure. As shown in Figure A-8, Conceptual Rendering, of Attachment A, Project Description, the Project would become part of this urban fabric, and the Project massing, height, and aesthetic character would be consistent with many of the existing and proposed commercial, residential, and warehouse and distribution center structures in the vicinity of the Project Site. In particular, the proposed maximum building roofline height of 102 feet would be generally consistent with other building heights in the vicinity, including the six-story Fred Jordan Mission (west of the Project Site across Towne Avenue) and the seven-story former Salvation Army Building at 809 E. 5th Street (one block east of the Project Site). The Project design would not conflict with the surrounding visual environment in terms of building height, design, massing, and scale.

Based on the analysis above, with the exception of removal of the Edward Hotel, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. As discussed in Response to Checklist Questions V.a., below, potential impacts to historical resources will be addressed in the Draft EIR. PRC Section 21099 does not include impacts to historical or cultural resources. Therefore, **pursuant to SB 743 and ZI No. 2452, Project impacts on visual character or quality of the site or its surroundings during operation would not be considered significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## Shading

As provided in the L.A. CEQA Thresholds Guide, the visual character or quality of a site and its surroundings can also be affected by shading cast upon adjacent areas by proposed structures. Shadow effects depend on several factors, including the local topography, height and bulk of a project's structural elements, sensitivity of adjacent land

uses, existing conditions on adjacent land uses, season, and duration of shadow projection. According to the L.A. CEQA Thresholds Guide, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. According to the L.A. CEQA Thresholds Guide, a proposed project would have a significant shading impact if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area surrounded by existing and planned development. Surrounding uses in the vicinity of the Project Site include commercial uses to west of and immediately adjacent to the Project Site. The six-story Fred Jordan Mission is located further west of the Project Site across Towne Avenue and the seven-story former Salvation Army Building one block east of the Project Site. Residential uses are located immediately east of the Project Site. However, these uses do not include any balconies or outdoor courtyards. Land uses across Stanford Avenue, further east of the Project Site, as well as uses north and south of the Project Site across 5th Street, include warehouse and distribution centers. As discussed above, the L.A. CEQA Thresholds Guide defines shadow sensitive uses as: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. Based on this definition of shadow sensitive uses, the surrounding uses in the vicinity of the Project Site do not include shadow-sensitive uses. Nonetheless, shadow diagrams included in Appendix IS-1 of this Initial Study were provided for informational purposes. As shown therein, there are no shadow-sensitive areas in the Project vicinity that would be shaded for three hours or more between the hours of 9:00 a.m. and 3:00 p.m. during the winter or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. during the remaining seasons. **In addition, pursuant to SB 743 and ZI No. 2452, Project impacts with respect to shading would not be considered significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site currently generates moderate levels of artificial light and glare typical of a residential development. Light sources within the Project Site include low-level security lighting and interior lighting emanating from the existing residential building on the Project Site. Glare sources within the Project Site include glass building surfaces. The

surrounding ambient nighttime lighting environment is typical of a developed, urban environment. The primary nighttime lighting sources in the Project vicinity include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting.

## Construction

In accordance with the provisions of LAMC Section 41.40, construction activities would occur between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. Therefore, construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours during the winter season when daylight is no longer sufficient. Furthermore, construction-related illumination would be used for safety and security purposes only, and would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. Construction activities would not result in a new source of substantial light which would adversely affect day or nighttime views in the area. Furthermore, pursuant to SB 743 and ZI No. 2452, Project impacts related to lighting during construction of the Project would not be considered significant, and no mitigation measures are required.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. As noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. **Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur. No further evaluation of this topic in an EIR is required. Furthermore, pursuant to SB 743 and ZI No. 2452, Project impacts related to light and glare during construction would not be considered significant, and no mitigation measures are required.**

## Operation

The Project would replace the existing three-story building, which contains 46 Very Low Income SRO units and one manager's unit, with the proposed eight-story residential building, which would contain 51 residential units, a manager's unit, residential supportive service uses, and one surface parking space. The Project would introduce new sources of light and glare that are typically associated with residential uses, including low-level interior lighting visible through the windows of the residential units, residential supportive service spaces and amenities, and the ground-floor lobby; low-level accent lighting on the proposed building to highlight architectural features and signage; lighting associated with the outdoor

patio on Floor 2; low-level lighting on the roof deck at the top level of the proposed building; and low-level security, wayfinding lighting and landscape lighting throughout the Project Site. Surrounding uses with views of the Project Site that are considered sensitive relative to nighttime light include the residential building directly adjacent to and east of the Project Site. In the immediate Project vicinity, the nearest off-site receptors that are considered sensitive relative to daytime glare and have views of the Project Site are motorists along 5th Street, as well as the residential building to the east. New sources of glare would include building surfaces and Project-related vehicles.

The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity during the day and night.

All exterior lighting would be shielded or directed toward the areas to be illuminated to limit light spillover onto off-site uses and would meet all applicable LAMC lighting standards. As required by Chapter 9, Article 3, Division 1, Section 93.0117(b) of the LAMC, no exterior light sources and building materials associated with the Project would cause more than two foot-candles of lighting intensity or generate direct glare onto (1) exterior glazed windows or glass doors on any property containing residential units; (2) an elevated habitable porch, deck, or balcony on any property containing residential units; or (3) any ground surface intended for uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to approval by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

With regard to glare, the Project would be designed in a contemporary architectural style and would feature various surface materials. Building materials would include metal, plaster, glass, and brick. The Project would use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the Project would include one parking space, which would be accessed from the alley directly adjacent to and north of the Project Site. There would be no other vehicular access to the Project Site. While headlights from the vehicle entering and exiting the Project's driveways could be visible from the residential receptors east of the Project Site during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact.

**Based on the above, Project operation would not result in a new source of substantial light or glare, which would adversely affect day or nighttime views in the**

area. No further evaluation of this topic in an EIR is required. Furthermore, pursuant to SB 743 and ZI No. 2452, Project impacts related to light and glare would not be considered significant, and no mitigation measures are required.

## 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Would the Project:*

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

**No Impact.** The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with one low-rise residential building. In addition, no agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.<sup>6,7</sup> **As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as M2-2D (Light Industrial Zone, Height District 2D). The Project Site is not zoned for agricultural use. Furthermore, none of the surrounding properties are zoned for agricultural use. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.<sup>8,9</sup> **Therefore, the Project would not conflict with any zoning for agricultural**

<sup>6</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>7</sup> State of California Department of Conservation, *Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2014, April 2016*.

<sup>8</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>9</sup> State of California Department of Conservation, *Division of Land Resource Protection, State of California Williamson Act Contract Land, Los Angeles County Williamson Act FY 2015/2016, 2016*.

uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and is currently developed with one low-rise residential building. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for industrial uses and is not zoned and/or used as forest land.<sup>10</sup> **Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland. **Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.<sup>11</sup> **As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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<sup>10</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>11</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 27, 2017.

### 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.

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

Would the Project:

**a) Conflict with or obstruct implementation of the Air Quality Management Plan or Congestion Management Plan?**

**Potentially Significant Impact.** The Project Site is located within the 6,700-square-mile South Coast Air Basin (Air Basin). Within the Air Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM<sub>2.5</sub>], and lead<sup>12</sup>). The SCAQMD’s 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control

<sup>12</sup> Partial Nonattainment designation for lead for the Los Angeles County portion of the Air Basin only.

strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>13</sup> With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. **As a result, development of the Project could have a potential adverse effect on the SCAQMD’s implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project’s consistency with the SCAQMD’s AQMP.**

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

**Potentially Significant Impact.** The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources, such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other on-site activities. **Therefore, air quality standards could potentially be violated and the EIR will provide further analysis of the Project’s construction and operational air pollutant emissions.**

***c) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>) under an applicable federal or state ambient air quality standard?***

**Potentially Significant Impact.** As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Air Basin, which is currently in non-attainment of federal air quality standards for ozone, PM<sub>2.5</sub> and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM<sub>10</sub>), and PM<sub>2.5</sub>.

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<sup>13</sup> SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Air Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

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

**Potentially Significant Impact.** As discussed above, the Project would result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses. **Therefore, the Project could potentially expose sensitive receptors to substantial pollutant concentrations and the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.**

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

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

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses, as the Project would include Restricted Affordable Efficiency Dwelling units and residential supportive service uses. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. In addition, the Project would not include a loading dock, which could have the potential to emit objectionable odors. Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.<sup>14</sup>

Construction and operation of the Project would also comply with SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose,

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<sup>14</sup> SCAQMD, *Visible Emissions, Public Nuisance, and Fugitive Dust*, [www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust](http://www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust), accessed November 27, 2017.

health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.<sup>15</sup>

**Based on the above, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

## IV. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the Project:</i>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>15</sup> SCAQMD, Rule 402, Nuisance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the Project:

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

**No Impact.** The Project Site is located in a highly urbanized area and is currently developed with a low-rise residential building. Landscaping is limited, consisting of one Callery pear tree located in the sidewalk in front of the Project Site along 5th Street.<sup>16</sup> Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife<sup>17</sup> or by the U.S. Fish and Wildlife Service<sup>18</sup> would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.<sup>19</sup> **Therefore, the Project would not have any adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and**

<sup>16</sup> Tina Chee Landscape Studio, *Tree Inventory and Report, January 21, 2017. See Appendix IS-2, of this Initial Study.*

<sup>17</sup> California Department of Fish and Wildlife, *California Natural Diversity Database, Special Animals List, April 2017.*

<sup>18</sup> United States Fish and Wildlife Service, *ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=liste d, accessed November 27, 2017.*

<sup>19</sup> City of Los Angeles, *Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.*

**Wildlife Service, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

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

**No Impact.** The Project Site is located in a highly urbanized area and is currently developed with a low-rise residential building. No riparian or other sensitive natural community exists on the Project Site.<sup>20,21</sup> Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>22,23</sup> In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.<sup>24,25,26</sup> **Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site is located in a highly urbanized area and is currently developed with a low-rise residential building. No water bodies or federally protected wetlands as defined by Clean Water Act Section 404 exist on the Project Site.<sup>27</sup> **As such, the Project would not have an adverse effect on federally protected wetlands. No**

<sup>20</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>21</sup> U.S. Environmental Protection Agency, NEPAAssist, [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist), accessed November 27, 2017.

<sup>22</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

<sup>23</sup> Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

<sup>24</sup> California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), [www.wildlife.ca.gov/Data/BIOS](http://www.wildlife.ca.gov/Data/BIOS), accessed November 27, 2017.

<sup>25</sup> California Department of Fish and Wildlife, CDFW Lands, [www.wildlife.ca.gov/Lands](http://www.wildlife.ca.gov/Lands), accessed November 27, 2017.

<sup>26</sup> U.S. Fish and Wildlife Service, National Wetlands Inventory, [www.fws.gov/wetlands/index.html](http://www.fws.gov/wetlands/index.html), accessed November 27, 2017.

<sup>27</sup> U.S. Environmental Protection Agency, NEPAAssist, [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist), accessed November 27, 2017.

impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** As described above, the Project Site is located in a highly urbanized area and is currently developed with a low-rise residential building. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>28,29</sup>

Although unlikely, the on-site tree that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. In accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–September 15), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be affected. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. With compliance with the Migratory Bird Treaty Act, impacts related to wildlife movement would be less than significant. Tree removals would be undertaken pursuant to applicable City permits and requirements.

**Based on the above, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.**

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<sup>28</sup> City of Los Angeles, Department of City Planning, *Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.*

<sup>29</sup> Los Angeles County, *Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.*

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

**No Impact.** The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as “protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

Landscaping within the Project Site is limited, consisting of one Callery pear tree located in the sidewalk in front of the Project Site along 5th Street, which would be removed to accommodate the development of the Project. There are no trees on the Project Site that would be considered protected under the City of Los Angeles Native Tree Protection Ordinance. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the street tree would be replaced on a 2:1 basis. Removal of the existing street tree in the public right-of-way would occur in accordance with the policies of the Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division and would require approval of the Board of Public Works. **Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed with a low-rise residential building, which would be demolished to accommodate the Project. As described above, the Project Site does not support any habitat or natural community.<sup>30,31</sup> As previously described, landscaping is limited, consisting of one Callery

<sup>30</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>31</sup> United States Environmental Protection Agency, NEPAAssist, [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist), accessed November 27, 2017.

pear tree located in the public right-of-way in front of the Project Site along 5th Street.<sup>32</sup> No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>33</sup> **Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## V. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Would the Project:*

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

**Potentially Significant Impact.** CEQA Guidelines Section 15064.5 generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a

<sup>32</sup> Tina Chee Landscape Studio, *Tree Inventory and Report*, January 21, 2017. See Appendix IS-2, of this Initial Study.

<sup>33</sup> California Department of Fish and Wildlife, *California Regional Conservation Plans*, October 2017.

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

The Project Site is currently developed with the existing Edward Hotel, a 14,475-square-foot residential building, which contains 46 Very Low Income SRO units and one manager's unit. In addition, the Project Site is located within the boundaries of a potentially historic district, which has been identified as potentially eligible for listing in the National Register through SurveyLA as the Fifth Street Single Room Occupancy Historic District. The Project Site was identified as a Contributor to the potentially eligible historic district.<sup>34</sup> The Edward Hotel is proposed to be demolished as part of the Project. The Draft EIR will analyze the feasibility of retrofitting the Edward Hotel building, as a Project alternative, to meet any applicable building code requirements, while preserving the building's historic character-defining features. **Therefore, the Draft EIR will provide further analysis of the Project's potential impacts on historical resources.**

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

**Less Than Significant Impact.** CEQA Guidelines Section 15064.5(a)(3)(D) 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 of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. The records search conducted for the Project Site by the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton (see Appendix IS-3 to this Initial Study) indicates that there are no known archaeological resources on the Project

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<sup>34</sup> SurveyLA included the following statement of significance for this area: *Significant concentration of early 20th century SRO hotels in Downtown Los Angeles; associated with patterns of multi-family residential development in the areas. SRO hotels were an important multi-family property type in this area of the City.*

Site and seven archeological resources were identified within a 0.5-mile radius of the Project Site. The SCCIC letter also indicates that the Project area and most of surrounding radius have not been surveyed for cultural resources. While the SCCIC recommends that a qualified archaeological consultant be retained to monitor the ground disturbing activities, the Project is only proposing a limited amount of grading (just 370 cubic yards of export) associated with building foundations and footings (see Attachment A, Project Description). Thus, the potential for discovering archeological artifacts is low.

In addition, an Archaeological Resources Memo was conducted for the Project prepared by Dudek and included as Appendix IS-4 of this Initial Study. As discussed therein, review of technical reports for the broader Downtown area suggests that one additional unconfirmed historical archaeological resource may also be present in the Project vicinity. A series of maps prepared by Cogstone Environmental (Gust 2017; derived from Gumprecht 2001) for the Downtown Los Angeles area depicts an unconfirmed section of a historical-era water conveyance system known as the Zanja Madre running in a southerly route just east of the Project Site (See Attachment B of Appendix IS-4). However, further research has shown that this branch of the Zanja Madre was likely never lined and was abandoned in the 1890s or 1900s. Based on reviewed information, the Project would have no impact to this archaeological resource. As such, no resource-specific mitigation would be appropriate.

As discussed above, the Project is only proposing a limited amount of grading (just 370 cubic yards of export) and does not include underground parking or basement levels therefore the depth of excavation outside of previously undisturbed soils will be limited; however, there is always a possibility that subsurface archeological artifacts, deposits or features that were not identified during past construction adjacent to or within the Project Site could be encountered. In the event any archaeological materials are unexpectedly encountered during construction, work in the area would cease and deposits would be required to comply with the regulatory standards set forth in PRC Section 21083.2 and CEQA Guidelines Section 15064.5(c), including a determination of whether any such potential unique archaeological resource would be preserved in place or left in an undisturbed state. **Therefore, as compliance with the regulatory standards in PRC Section 21083.2 and CEQA Guidelines Section 15064.5(c) would ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading and excavation activities, the Project's impact on archaeological resources would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of

information on ancient life forms since the majority of species that have existed on earth from this era are extinct. PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

Based on the records search conducted by the Natural History Museum, included in Appendix IS-5 of this Initial Study, there are no vertebrate fossil localities that lie directly within the boundaries of the Project Site. However, the records search indicates that within the greater vicinity of the Project Site, there are fossil localities at depth in similar sediments as those underlying the Project Site. The closest vertebrate fossil locality is LACM 1755, located west-southwest of the Project Site near the intersection of Hill Street and 12th Street, which produced fossil specimens of horse (*Equus*) at depth of 43 feet below the surface. The next closest vertebrate fossil locality from these deposits is LACM 2032, located northeast of the Project Site near the intersection of Mission Road and Daly Street near the Golden State Freeway (I-5), which produced fossil specimens of pond turtle (*Clemmys mamorata*), ground sloth (*Paramylodon harlani*), mastodon (*Mammut americanum*), mammoth (*Mammuthus imperator*), horse (*Equus*), and camel (*Camelops*) at a depth of 20-35 feet below the surface. Further, the next closest vertebrate fossil locality from these deposits is LACM 1023, located north of LACM 2032 and northeast of the Project Site near the intersection of Workman Street and Alhambra Avenue, which produced fossil specimens of turkey (*Meleagris californicus*), sabre-toothed cat (*Smilodon fatalis*), horse (*Equus*), and deer (*Odocoileus*, at unstated depth).

According to the records search by the Natural History Museum, shallow grading or shallow excavations in the younger Quaternary Alluvium exposed throughout the Project Site are unlikely to provide significant fossil vertebrate remains. However, deeper excavations in the Project Site that extend down into older Quaternary deposits, may well encounter significant vertebrate fossils. The Project Site is located within a highly urbanized area of the City of Los Angeles and has been subject to grading and development in the past. The soils that underlay the Project Site are anticipated to consist of unconsolidated Holocene age alluvial fan deposits comprised of poorly graded sand and silty sand with varying amounts of gravel and cobbles derived primarily from the Los Angeles River, east of the Project Site. As discussed in Attachment A, Project Description, the Project would involve grading, including 740 cubic yards of soil (370 cubic yards of import and 370 cubic yards of export associated with building foundations and footings). **As grading would be surficial, and as the Project Site was previously developed, it is unlikely that development of the Project would uncover significant vertebrate fossil. Therefore, the Project's impact on paleontological resources would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

The Project Site is relatively flat and does not include any known unique geologic features, and no unique geologic features are anticipated to be encountered during Project construction. Therefore, the Project would not directly or indirectly destroy a unique geologic

feature. **The impact associated with unique geologic features would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** Although no human remains are known to have been found on the Project Site, there is the possibility that unknown resources could be encountered during Project construction, particularly during ground-disturbing activities, such as grading. While the uncovering of human remains is not anticipated, if human remains are inadvertently discovered during construction, such resources would be treated in accordance with state law, including CEQA Guidelines Section 15064.5(e), PRC Section 5097.98, and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the portion of the Project Site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department and the County Coroner would be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains.

**Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## **VI. Geology and Soils**

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based on the Geologic-Seismic Hazard Evaluation (Geotechnical Evaluation) prepared for the Project by Geocon West, Inc., dated November 16, 2017. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-6 of this Initial Study.

*Would the Project:*

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

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

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

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to

prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on City data, the closest fault is the Puente Hills Blind Thrust Fault, located approximately 0.88 mile (1.42 kilometers) from the Project Site.<sup>35,36</sup> In addition, based on the Geotechnical Evaluation, the closest active fault is the Hollywood Fault located approximately 5.2 miles to the north. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, within a City-designated Fault Rupture Study Area<sup>37</sup>, nor within a seismic hazard zone.<sup>38,39</sup> Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Moreover, the Project would not exacerbate existing fault rupture conditions. The Project is typical of urban environments and would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust. Furthermore, as discussed above, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Thus, the Project would not exacerbate existing environmental conditions related to fault rupture. **Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The closest active fault is the Hollywood Fault, which is located approximately 5.2 mile north of the Project Site. Impacts related to seismic ground shaking at the Project Site would not be

<sup>35</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>36</sup> *The Puente Hills Blind Thrust Fault is a buried fault with no surface trace, so variances in interpretation of the distance may occur. The distance provided in ZIMAS is the most conservative estimate.*

<sup>37</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>38</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>39</sup> *E-mail correspondence with Casey Jensen, Los Angeles Department of Building and Safety. See Appendix IS-7 of this Initial Study.*

exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would exacerbate ground shaking. Furthermore, as discussed above, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Additionally, the Project is not located within a seismic hazard zone. Therefore, impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required.

The following discussion about building and seismic codes is provided for informational purposes. Engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. As discussed in detail below, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. A final design-level geotechnical report will be prepared by the Applicant and reviewed to the satisfaction of the Department of Building and Safety before the issuance of grading permits. The final recommendations from that report will be enforced for the construction of the Project. Based on the Geotechnical Evaluation, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project would comply with the Los Angeles Building Code (LABC), which incorporates current seismic design provisions of the 2016 California Building Code with City amendments. The 2016 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the LABC. The Project would also be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report. In addition, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

**Based on the above, development of the Project would not exacerbate existing seismic conditions on the Project Site. Impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

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

**Less Than Significant Impact.** Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

Neither the City of Los Angeles nor the State of California classifies the Project Site as part of a potentially liquefiable area.<sup>40,41</sup> In addition, due to the relatively deep groundwater table, which is reported to be approximately 90 feet below ground surface (bgs), the potential for liquefaction and associated ground deformation beneath the Project Site, including lateral spread, is considered to be low. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. **As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

**iv) Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**No Impact.** Landslides generally occur in loosely consolidated, wet soil, and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the state<sup>42</sup> or the City of Los Angeles.<sup>43,44</sup> Development of the Project would not substantially alter the existing topography of the Site. Specifically, the Project Site would remain flat and would not cause landslides. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to

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<sup>40</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>41</sup> State of California, California Geological Survey, *Seismic Hazard Zones. Los Angeles Quadrangle*, March 25, 1999.

<sup>42</sup> State of California, California Geological Survey, *Seismic Hazard Zones. Los Angeles Quadrangle*, March 25, 1999.

<sup>43</sup> Los Angeles General Plan Safety Element, November 1996, *Exhibit C, Landslide Inventory & Hillside Areas*, p. 51.

<sup>44</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed November 27, 2017.

potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. **As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** Development of the Project would require grading and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Furthermore, as discussed below in Response to Checklist Question IX.a., the Project would be required to comply with the City's Low Impact Development (LID) ordinance and would implement best management practices (BMPs) as well as standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operation, the potential is relatively low since the Project Site would be fully developed, and no soils would be left exposed. **Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

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

**Less Than Significant Impact.** As discussed above, the Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. Additionally, as discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the depth to groundwater, liquefaction is unlikely at the Project Site. Furthermore, as discussed in the Geotechnical Evaluation, no large scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general Project vicinity. Therefore, there is little or no potential for ground subsidence to occur at the Project Site.<sup>45</sup> As such, the Project would not exacerbate existing conditions since it would not cause a geologic unit or soil to become unstable. **Impacts would be less**

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<sup>45</sup> Geocon West, Inc., *Geologic-Seismic Hazard Evaluation, November 16, 2017 (Appendix IS-6)*, p. 7.

than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**d) Be located on expansive soil, as defined in Table-18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project’s exacerbation of the existing environmental conditions?**

**Less Than Significant Impact.** Expansive soils are soils that swell when subjected to moisture and shrink when dried and are typically associated with clayey soils. Based on the Geotechnical Evaluation, the soils that underlay the Project Site are anticipated to consist of unconsolidated Holocene age alluvial fan deposits comprised of poorly graded sand and silty sand with varying amounts of gravel and cobbles derived primarily from the Los Angeles River, east of the Project Site. The soils are anticipated to range in density from loose to dense. Based on the anticipated geological conditions, the potential for expansive soils is considered to be low as the soils are anticipated to be granular in nature. If expansive soils are encountered, the potential impacts of expansive soils would be mitigated through proper design considerations. In addition, the Project would not increase the expansion potential of these soils. **Therefore, impacts related to expansive soils would not be exacerbated by the Project and, thus, would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

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

**No Impact.** The Project Site is located within a community served by existing wastewater infrastructure. The Project’s wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. **Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## VII. Greenhouse Gas Emissions

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Would the Project:*

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

**Potentially Significant Impact.** Gases that trap heat in the atmosphere are called greenhouse gases (GHG) since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere affects the earth’s temperature. The state has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHG emissions in California. Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. **Therefore, the EIR will provide further analysis of the Project’s GHG emissions.**

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

**Potentially Significant Impact.** As the Project would have the potential to emit GHGs, the EIR will include further evaluation of Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (e.g., Assembly Bill [AB] 32 and the City of Los Angeles Green Building Code). **Therefore, the EIR will provide further analysis of this topic.**

## VIII. Hazards and Hazardous Materials

As discussed above, in 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the Project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the Project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the Project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including

how it might affect future users and/or residents of the Project. For example, if construction of the Project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the Project's residents. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based, in part, on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the Project by Partner Engineering and Science, Inc., dated May 23, 2018. All specific information on historic and existing on-site conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-8 of this Initial Study.

*Would the Project:*

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

**Less Than Significant Impact.** The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and residential supportive service uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including, but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. **Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

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

**Less Than Significant Impact.** The Phase I ESA included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. According to available historical sources, the Project Site was undeveloped from at least 1894, and has been developed for use as a residential hotel since at least 1924 with a storefront present until at least the late-1980s.

During the site reconnaissance, no evidence of hazardous substances, aboveground storage tanks or underground storage tanks, spills, stains, or other indications of surficial release, polychlorinated biphenyls, strong pungent or noxious odors, pools of liquid, drains, sumps, or clarifiers, pits, ponds for lagoons, stressed vegetation, or environmental hazards, including landfill activities or radiological hazards, were observed or identified on the Project Site.<sup>46</sup> Small quantities of general maintenance supplies were found to be properly labeled. In addition, the Phase I ESA did not identify any recognized environmental condition (REC), controlled recognized environmental condition (CREC), or historical recognized environmental condition (HREC) on the Project Site.<sup>47</sup>

Based on the age of the existing building on-site, there is a possibility that asbestos-containing materials (ACM) and lead-based paint (LBP) may be encountered during building demolition. In the event any suspect ACMs or LBP is found, the Project would adhere to all federal, state, and local regulations prior to their disturbance and removal. These regulations include, but are not limited to, the Toxic Substances Control Act, the Resource Conservation and Recovery Act, the federal and state Occupational Safety and Health Acts, SCAQMD Rule 1403 pertaining to asbestos emissions from renovation/demolition activities, and the Residential Lead-Based Paint Reduction Act. With regard to ACMs, in accordance with SCAQMD Rule 1403, the Project would be required to conduct a comprehensive asbestos survey prior to demolition. In the event that either ACMs or LBPs are found within areas proposed for demolition, abatement of ACMs would need to be performed. Abatement, air monitoring and final certification for abatement of ACMs would comply with all federal, state, and local regulations, including National Emission Standards for Hazardous Air Pollutants (NESHAPS, per Section 112 of the CAA), Cal/OSHA and South Coast Air Quality District (SCAQMD). The Project would also implement an Operations and Maintenance Program in order to safely manage any ACMs or LBPs found on the Project Site. Mandatory compliance

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<sup>46</sup> Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report*, November 14, 2017. See Appendix IS-8, of this Initial Study.

<sup>47</sup> Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report*, November 14, 2017. See Appendix IS-8, of this Initial Study.

with applicable federal and state standards and procedures would reduce risks associated with ACMs and LBP to less-than-significant levels.

The current uses on the Project Site and adjoining properties are not the types of uses that are indicative of the use, treatment, storage, disposal, or generation of significant quantities of hazardous substances or petroleum products. As described above and in the Phase I ESA, no evidence or record of on-site underground storage tanks (UST) or aboveground storage tanks (AST) was found. In the event that an UST is unexpectedly encountered on-site during site clearance, it would be appropriately documented and removed according to Los Angeles Fire Department (LAFD) regulations.

No recognized environmental concerns or historically recognized environmental concerns were identified on the Project Site.<sup>48</sup> However, according to ZIMAS, the Project Site is located within a Methane Buffer Zone. Methane Buffer Zone sites include sites immediately surrounding gas sources and where testing and sometimes mitigation is required by the City of Los Angeles Department of Building and Safety. The Project would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790. The ordinance requires that each parcel that falls within a methane or methane buffer zone be evaluated for methane concentration and pressure and certified by an approved testing agency. Upon completion and certification, the highest concentration and pressure measures during the investigation determines the "design level" for the project. Adherence to the City of Los Angeles' Methane Mitigation Ordinance, the construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to avoid substantial risk in the event that elevated levels of these soil gases are encountered during grading and construction. Based on such safety provisions and appropriate monitoring, grading and construction activities associated with development within a Methane Buffer Zone are not expected to substantially expose construction workers to elevated levels of methane or other soil gases. In addition, as the permitting process would ensure that new development would comply with the City's Methane Mitigation Ordinance, the Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, associated with the release of methane gas. Furthermore, as discussed in Attachment A, Project Description, the Project would involve grading, including 370 cubic yards of export associated with building foundations and footings. As such, the potential to penetrate the Methane Buffer Zone is considered low.

**Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of**

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<sup>48</sup> Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, November 14, 2017. See Appendix IS-8, of this Initial Study.

**hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** There are no schools, existing or proposed, within one-quarter mile of the Project Site. The nearest school to the Project Site is 9th Street Elementary School, located approximately 0.53 mile south of the Project Site at 835 Stanford Avenue. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and residential supportive service uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, it is reasonably anticipated that all materials during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Additionally, truck haul routes during construction of the Project would likely be along Alameda Street to and from the US-101 or I-10 and trucks would not travel adjacent to the school. **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 are required. No further analysis of this topic in an EIR is required.**

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

**Less Than Significant Impact.** California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While California Government Code Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are

planned or have occurred. The database provides a listing of federal Superfund sites, state response sites, voluntary cleanup sites, and school cleanup sites.

The Phase I ESA, provided in Appendix IS-8, included the results of consultation with local agency representatives and a review of available federal, state, and local databases including, but not limited to, Envirostor, Geotracker, ZIMAS, and the Division of Oil, Gas, and Geothermal Resources (DOGGR). The Project Site is listed in the HAZNET database for disposal of asbestos containing waste in 1994. The Phase I ESA states that as this was a one-time occurrence, with no reported violations, and the nature of waste removed, this is not considered to represent significant environmental concern to the Project Site. Various sites in the vicinity of the Project Site are listed in the California SWEEPS UST, California HST UST, and California FID UST for reportedly operating five USTs, including two 10,000-gallon gasoline tanks, one 10,000-gallon diesel tank, one 50-gallon waste oil tank, and one 1,000-gallon chemical tank. The USTs, which are located at 440 Towne Avenue directly northwest of the Project Site, were reportedly installed in 1970. The property was not identified as a leaking UST site. Based on the lack of documented release, this listing is not expected to represent a significant environmental concern at this time. **Therefore, the Project would not create a significant hazard to the public or the environment associated with identification of the Project Site on a hazardous materials list.**

Additionally, as discussed above, the types and amounts of hazardous materials used during operation of the proposed residential and residential supportive service uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. 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 have the potential to exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site is not located within an area subject to an airport land use plan or within two miles of an airport. The closest airport to the Project Site is Los Angeles International Airport (LAX), located approximately 11 miles southwest of the Project Site. Given the distance between the Project Site and LAX and the proposed height of the new building, the Project would not have the potential to result in a safety hazard. **Therefore, no impact would occur, and no mitigation measures are required. No further**

evaluation of this topic in an EIR is required. With regard to potential impacts to air traffic, see Response to Checklist Question XVI.c, Transportation and Traffic, below.

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 19.8 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield and the proposed height of the new building of 102 feet, the Project would not have the potential to result in a safety hazard. **No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than one mile of the Project Site. Alameda Street is also a designated disaster route located approximately 1,000 feet east of the Project Site.<sup>49</sup> 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, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would involve little to no increase in traffic in the Project vicinity as the only parking space on the Project Site would be used by the building manager. The parking space would be accessed from the alley directly adjacent to and north of the Project Site. There would be no other vehicular access to the Project Site. In addition, as discussed above, the closest disaster routes include Alameda Street, US-101, I-10, and I-5, which are all less than a 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 related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.**

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<sup>49</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

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

**Less Than Significant Impact.** There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone<sup>50</sup> or within a City-designated fire buffer zone.<sup>51</sup> Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed and rehabilitated in accordance with LAMC requirements pertaining to fire safety. Specifically, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, and sketches, as necessary, to identify access points, fire suppression devices and systems, utility controls, and stairwells; LAMC Section 57.118 establishes LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. Additionally, the proposed residential and residential supportive service uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. **Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

**IX. Hydrology and Water Quality**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the Project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Violate any water quality standards or waste discharge requirements?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

<sup>50</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 27, 2017. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone” shown on Exhibit D of the Los Angeles General Plan Safety Element.

<sup>51</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
would drop to a level which would not support existing land uses or planned 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Would the Project:*

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

**Less Than Significant Impact.** During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, Project-related construction activities could have the potential to result in adverse effects on water quality. However, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. Furthermore, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. With compliance with applicable regulatory requirements, impacts to water quality during construction would be less than significant. Additionally, groundwater is reported to be approximately 90 feet bgs. As the Project would only involve surficial grading, including 740 cubic yards of soil (370 cubic yards of import and 370 cubic yards of export associated with building foundations and footings), Project construction is not anticipated to disturb the groundwater table during construction.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential and residential supportive service uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, in accordance with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181899), best management practices (BMPs) would be implemented on-site to address City and state water quality requirements. Implementation of BMPs would be beneficial to the Project Site as the Project Site is 100 percent impermeable and currently does not include BMPs.

With compliance with applicable regulatory requirements, including implementation of best management practices and LID standards as described above, the Project would not violate any water quality standards or waste discharge requirements. **Therefore, impacts to surface water quality would be less than significant. No mitigation measures are required, and no further evaluation of this topic in the EIR is required.**

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

**Less Than Significant Impact.** As discussed above, groundwater was reported to be approximately 90 feet bgs. The Project would only involve surficial grading, including 740 cubic yards of soil (370 cubic yards of import and 370 cubic yards of export associated with building foundations and footings). Therefore, the need for dewatering during construction or operation is not anticipated.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is entirely impervious under existing conditions. Therefore, the degree to which surface water infiltration and groundwater recharge occurs on-site is negligible. With implementation of the Project, impervious surfaces would comprise nearly 100 percent of the Project Site. As such, operation of the Project would not alter the existing limited groundwater recharge that occurs within the Project Site. Furthermore, as discussed above in Response to Checklist Question IX.a, above, in accordance with the City's LID Ordinance, the Project would include BMPs to treat stormwater. Therefore, the Project would not substantially interfere with groundwater recharge.

**Based on the above, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** As previously described, the Project Site is currently developed with an existing 14,475-square-foot residential building, which would be demolished to accommodate the Project. Landscaping on-site is very limited. The Project Site is not traversed by any water courses or rivers. Based on the existing uses of the Project Site and the limited landscaping, the Project Site is currently comprised of 100-percent impervious surface areas. Therefore, given the existing impervious nature of the Project Site, any stormwater that falls on the Project Site is likely directed to storm drains adjacent to the Project Site on 5th Street and not infiltrated or captured on-site. As described above, the Project is an infill development and would replace the existing Edward Hotel with an eight-story building comprised of 33,007 square feet. Since the Project would be constructed within the extent of the Project Site, with implementation of the Project, the surface area of the Project Site would remain mostly impervious. In addition, the Project would include several planter boxes throughout the building that would serve to capture some of the stormwater from the Project Site. Any stormwater not captured by the proposed planter boxes and landscaped areas would continue to flow to the storm drains adjacent to the Project Site along 5th Street. Furthermore, as discussed above, the Project would

comply with the City's LID requirements, which would address erosion control and would minimize the discharge of pollutants. Therefore, the Project would not substantially alter existing drainage patterns, including through the alteration of a stream or river, which could result in an increase in substantial erosion or siltation on- or off-site. **Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** There are no streams or rivers within the Project Site or in the vicinity of the Project Site. The Los Angeles River is located approximately 0.68 mile east of the Project Site. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, as described above in Response to Checklist Question IX.c, the Project would not alter drainage patterns or result in an increase in surface runoff. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site. **Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** As discussed in Response to Checklist Questions IX.a through IX.c, above, the Project would maintain the existing impervious surfaces within the Project Site and would not alter drainage patterns or result in an increase in runoff. Thus, the existing public stormwater system would continue to have sufficient capacity to accommodate the Project. In addition, with compliance with the City's LID requirements, the Project would include BMPs to treat stormwater and would not result in additional sources of polluted runoff. **Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** As discussed above in Response to Checklist Question IX.a, the Project would implement BMPs to reduce stormwater pollution on the Project Site in accordance with the City's LID requirements. Therefore, the Project would not substantially degrade water quality. **Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.<sup>52,53</sup> Thus, the Project would not place housing within a 100-year flood hazard area. **No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

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

**No Impact.** As discussed above in Response to Checklist Question IX.g, the Project Site is not located within a designated 100-year flood hazard area. Thus, the Project would not place structures that would impede or redirect flood flows within a 100-year flood hazard area. **No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** As discussed above in Response to Checklist Question IX.g, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin.<sup>54</sup> The nearest levee is along the Los Angeles River located approximately 0.68 mile east of the Project Site. The U.S. Army Corps of Engineers (ACOE) operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in North Hollywood and Stuart and Grey Road in Downey, which includes the portion east of the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the ACOE has directed repair of damaged embankments upstream to the Project Site and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015/2016 El Niño storm season. Furthermore, the Los Angeles River is channelized and contains existing flood control facilities which regulate flow volume to prevent flooding. **With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts**

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<sup>52</sup> Federal Emergency Management Agency, *Flood Insurance Rate Map, Panel Number 06037C1075F, effective September 26, 2008.*

<sup>53</sup> City of Los Angeles, *Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.*

<sup>54</sup> City of Los Angeles, *Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**j) Inundation by seiche, tsunami, or mudflow?**

**Less Than Significant Impact.** A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located approximately 13 miles east of the Pacific Ocean and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.<sup>55</sup> The Los Angeles River is located approximately 0.68 mile to the east but includes a sunken concrete lined channel, and there are no major water-retaining structures that are located immediately up-gradient from the Project Site. Thus, inundation as a result of seiche is considered unlikely. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Given the fact that the Project Site is not mapped by either the state or the City as being located in an area prone to landslides, the potential for the Project Site to be inundated by mudflows is low. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. **Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## X. Land Use and Planning

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the Project:

- a. Physically divide an established community?

<sup>55</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the Project:

**a) Physically divide an established community?**

**Less Than Significant Impact.** The Project would not be out of character with the surrounding area as the Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. Surrounding uses in the vicinity of the Project Site include commercial uses to west of and immediately adjacent to the Project Site. The six-story Fred Jordan Mission is located further west of the Project Site across Towne Avenue. Residential uses are located immediately east of the Project Site along Stanford Avenue. Land uses across Stanford Avenue, further east of the Project Site, as well as uses north and south of the Project Site across 5th Street, include warehouse and distribution centers. The Project would replace the existing three-story 14,475-square-foot Edward Hotel with an eight-story 33,007-square-foot residential building. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose a freeway or other large infrastructure or barrier that would divide a community.

In terms of land use type and building height, massing, and scale, the proposed building would be similar to and compatible with existing off-site uses. The building’s massing would be minimized by differentiating between the first three floors and the floors above with the use of different façade materials and treatments. The proposed maximum building roofline height of 102 feet would be generally consistent with other building heights in the vicinity, including the six-story Fred Jordan Mission (west of the Project Site across Towne Avenue) and the seven-story former Salvation Army Building at 809 E. 5th Street (one block east of the Project Site). The lower three floors would utilize a brick façade to evoke the material and pattern of the existing building and tall glass windows. The brick façade would also be consistent with buildings immediately adjacent to the Project Site and within the surrounding area. Floors 4 through 8 would be designed with metal wall panels and large

windows, which would have metal fins or awnings or metal railings to create additional texture to break up the building's massing

The building would incorporate design elements of the existing building and would be complementary to and compatible with the mixture of low- and mid-rise structures in the neighborhood. The Project would not have a long-term effect of adversely altering a neighborhood or community through on-going disruption, division, or isolation of these uses. Impacts related to land use compatibility would be less than significant. Therefore, the Project would not physically divide, disrupt, or isolate an established community and Project impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.**

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

**Potentially Significant Impact.** As discussed in Attachment A, Project Description of this Initial Study, the Project requires discretionary approvals, including, but not limited to, a General Plan Amendment, a Vesting Zone and Height District Change, and Site Plan Review. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. **Therefore, the EIR will provide further analysis of whether the Project conflicts with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.**

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed with a low-rise residential building, which would be demolished to accommodate the Project. As previously described, landscaping is limited, consisting of one Callery pear tree located in the sidewalk in front of the Project Site along 5th Street.<sup>56</sup> As discussed above in Section IV, Biological Resources, no Conservation Plan, Natural Community Conservation

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<sup>56</sup> *Tina Chee Landscape Studio, Tree Inventory and Report, January 21, 2017. See Appendix IS-2, of this Initial Study.*

Plan, or other approved habitat conservation plans apply to the Project Site.<sup>57, 58</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. **No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## XI. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Would the Project:*

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

**No Impact.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone, where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.<sup>59,60,61</sup> The Project Site is also not located within a City-designated oil field or oil drilling area.<sup>62</sup> In addition, according to the

<sup>57</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 27, 2017.

<sup>58</sup> California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017.

<sup>59</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

<sup>60</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

<sup>61</sup> City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

<sup>62</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

California DOGGR, the Project Site is not located within the limits of an oilfield.<sup>63</sup> **Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.<sup>64,65,66</sup> The Project Site is also not located within a City-designated oil field or oil drilling area.<sup>67, 68</sup> Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. **No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## XII. Noise

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the Project result in:

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

<sup>63</sup> California Division of Oil, Gas and Geothermal Resources, 2017, Online Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed November 27, 2017.

<sup>64</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

<sup>65</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

<sup>66</sup> City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

<sup>67</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

<sup>68</sup> California Division of Oil, Gas and Geothermal Resources, 2017, Online Well Finder, <http://maps.conservation.ca.gov/doggr/#close>, accessed November 27, 2017.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Would the Project result in:*

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

**Potentially Significant Impact.** During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new permanent residential uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. **Therefore, further evaluation of this topic will be provided in the EIR.**

**b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?**

**Potentially Significant Impact.** Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne

vibration and noise levels during short-term construction activities. **Therefore, further evaluation of this topic will be provided in the EIR.**

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

**Potentially Significant Impact.** As discussed in Response to Checklist Question XII.a., human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. **Therefore, further evaluation of this topic will be provided in the EIR.**

***d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?***

**Potentially Significant Impact.** As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. **Therefore, further evaluation of this topic will be provided in the EIR.**

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

**No Impact.** The Project Site is not located within an airport land use plan or within two miles of an airport. The closest airport to the Project Site is LAX, located approximately 11 miles southwest of the Project Site. Given the distance between the Project Site and LAX, the Project would not expose people residing or working in the Project area to excessive noise levels. **Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 19.8 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not expose people residing or working in the Project area to excessive noise levels. **Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

### XIII. Population and Housing

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the Project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

*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)?**

**Less Than Significant Impact.** The Project would result in the construction of 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units and one manager’s unit. Development of the Project would replace 46 Very Low Income SRO units and one manager’s unit. As such, the Project would result in a minor increase the residential population within the Project vicinity. As discussed above in Checklist Question III(a), Air Quality, SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG has prepared the 2016–2040 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2040. The growth projections in the 2016–2040 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG’s planning area. The Project Site is located in SCAG’s City of Los Angeles Subregion. According to SCAG’s 2016–2040 RTP/SCS, the forecasted population

for the City of Los Angeles Subregion in 2018 is approximately 4,009,193 persons.<sup>69</sup> In 2021, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,091,039 persons.<sup>70</sup> The four net new residential units proposed under the Project would each only include one person per dwelling unit.<sup>71</sup> The four net new residents generated by the Project would represent approximately 0.005 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2018 and 2021. Furthermore, the Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's population projection for the City of Los Angeles Subregion.

According to the 2016–2040 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2018 is approximately 1,403,671 households.<sup>72</sup> In 2021, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,442,757 households.<sup>73</sup> Thus, the Project's four net new residential units would constitute up to approximately 0.01 percent of the housing growth forecasted between 2018 and 2021. Therefore, the Project's housing units would be well within SCAG's housing projection for the Subregion.

The Project would generate approximately four full-time equivalent (FTE) employees based on information provided by the Applicant. The existing residential uses currently employ two FTE employees. Therefore, the Project would have a net increase of two FTE employees. According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2018 is approximately 1,797,693 employees.<sup>74</sup> In 2021, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,848,339 employees.<sup>75</sup> Thus, the Project's estimated two net new employees would constitute approximately 0.004 percent of the employment growth forecasted between 2018 and 2021. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

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<sup>69</sup> *Based on a linear interpolation of 2012–2040 data.*

<sup>70</sup> *Based on a linear interpolation of 2012–2040 data.*

<sup>71</sup> *The residential units proposed under the Project are Restricted Affordable Efficiency Dwelling units, and, therefore, would only have one person per unit.*

<sup>72</sup> *Based on a linear interpolation of 2012–2040 data. SCAG forecasts "households," not housing units. As defined by the U. S. Census Bureau, "households" are equivalent to occupied housing units.*

<sup>73</sup> *Based on a linear interpolation of 2012–2040 data.*

<sup>74</sup> *Based on a linear interpolation of 2012–2040 data.*

<sup>75</sup> *Based on a linear interpolation of 2012–2040 data.*

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG’s population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial population or housing growth. **Impacts related to population and housing would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required. With regard to cumulative population and housing impacts, please see Checklist Question XIX.b, below.**

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

**Less Than Significant Impact.** The Project would result in the removal of 46 Very Low Income SRO units and one manager’s unit. However, the Project would provide for 50 Restricted Affordable Efficiency Dwelling units and one manager’s unit. As such, the Project would not displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere. **Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

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

**Less Than Significant Impact.** The Project would result in the removal of 46 Very Low Income SRO units and one manager’s unit. However, the Project would provide for 50 Restricted Affordable Efficiency Dwelling units and one manager’s unit. As such, the Project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. **Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.**

## XIV. Public Services

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*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**

**Less Than Significant Impact.** Fire protection for the Project Site is provided by the LAFD. The LAFD generally considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, shall comply with LAMC Table 57.507.3.3. Based on Table 57.507.3.3 provided in LAMC Section 57.507.3.3, the maximum response distance for the Project (Industrial and Commercial category) from fire stations with an engine company is one mile and for a truck company is one and a half miles. If either of these distances is exceeded, all structures located on a Project Site would require automatic fire sprinklers.

The “first-in” fire station serving the Project Site would be Fire Station No. 4, located at 450 Temple Street, approximately 0.9 mile northeast of the Project Site. Fire Station No. 4 consists of a task force truck and engine company, as well as a hazardous materials unit and houses 14 staff members.<sup>76</sup> Under LAMC criteria, the existing fire response distance and equipment provisions would be adequate. Nonetheless, the proposed building would be constructed with an automatic fire sprinkler system to reduce the potential for fire impacts at the Project Site, as required by Project Design Feature XIV-1, below. Furthermore, the Project would comply with LAFD requirements regarding access and fire safety.

<sup>76</sup> Verbal correspondence with LAFD, Ralph M. Terrazas, Fire Chief, September 21, 2017. Phone log provided in Appendix IS-9.

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety and Health Administration has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations (CFR), Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by the Occupational Safety and Health Administration.<sup>77</sup> Additionally, in accordance with the provisions of the Occupational Safety and Health Administration, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.<sup>78</sup> Construction of the Project would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities associated with the Project to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

During construction of the Project, construction activities would generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and construction worker trips. Additionally, construction activities may involve temporary partial lane closures adjacent to the Project Site for utility improvements, staging, and general construction activities. Other implications of construction-related traffic include increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could potentially affect emergency vehicles travelling to the Project Site and nearby uses along surrounding streets. However, partial lane closures, should any be required, would be temporary in nature and in the event of partial lane closures, travel on area roadways and access to the Project Site would be maintained. In addition, during construction of the Project, a construction traffic management plan, as required by Project Design Feature TR-PDF-1, below, would be implemented to ensure that adequate and safe access remains

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<sup>77</sup> *United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, [www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10671](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671), accessed November 27, 2017.*

<sup>78</sup> *United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, [www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10671](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671), accessed November 27, 2017.*

available at the Project Site. As part of this plan, provisions for temporary traffic control would be provided during all construction activities along public rights-of-way to improve traffic flow on public roadways (e.g., flaggers). Designated truck queuing, equipment staging, and construction worker parking areas would also be provided. Additionally, emergency access to the Project Site would remain clear and unhindered during construction of the Project pursuant to City requirements. Furthermore, pursuant to California Vehicle Code (CVC) Section 21806, the drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic.

With regard to Project operation, the Project would replace the existing 14,475-square-foot residential building, which contains 47 dwelling units, with a 33,007-square-foot residential building, which would contain 51 dwelling units. This would result in a net increase of four dwelling units. Thus, the daytime population within Fire Station No. 4's service area would increase by approximately 6 persons<sup>79</sup> as compared to existing conditions. This daytime population projected to be generated by the Project would marginally increase the demand for LAFD fire protection and emergency medical services. The Project would comply with all applicable provisions set forth in the City Building Code and Fire Code regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. In addition, it is noted that since the Project Site would be located within the required response distance from a fire station with an engine or truck company, pursuant to LAMC Section 57.507.3.3, the buildings proposed as part of the Project would not be required to be constructed with automatic fire sprinkler systems. Notwithstanding, to enhance fire safety, the Project would include the installation of a sprinkler system, which would reduce the demand placed on the LAFD, as required by Project Design Feature FIR-PDF-1, below. Moreover, the LAFD would be consulted during final building design to ensure adequate compliance with the Building and Fire Codes prior to the issuance of any construction permits. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Therefore, the Project would not result in the need for new or physically altered fire facilities.

With regard to emergency vehicle access during operation, emergency vehicles would continue to have access to the Project Site from 5th Street and the alley directly north of the

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<sup>79</sup> Daytime population found by adding the number of net new residents (four) with the number of net new employees (two).

Project Site. The area surrounding the Project Site includes a mature street system consisting of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access and circulation in the vicinity of the Project Site, respectively. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. The Project does not include any improvements along the streets surrounding the Project Site, which could impede emergency vehicle access. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Therefore, the Project would not significantly impact emergency vehicle access to the Project Site and surrounding uses, and the Project is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

As discussed in Checklist Question No. XVI, Transportation and Traffic, below, Project-related traffic would not increase with development of this Project. As traffic would not increase, the Project would not have the potential to significantly impact emergency access to the Project Site or surrounding properties. Accordingly, the Project is not anticipated to substantially affect existing emergency vehicle response in the service area of Fire Station No. 4. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel.

Additionally, based on fire flow standards set forth in LAMC Section 57.507.3.1, the Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gallons per minute (gpm) from four hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). In accordance with the fire flow standards set forth in the LAMC, the Applicant would coordinate with the City to ensure that adequate water infrastructure is available to meet the required fire flows. Should the City determine that additional water connections and water infrastructure capacity is needed to meet the required fire flows, the Applicant would implement such improvements in consultation with the City.

Based on the above, potential impacts to fire protection services would be reduced through compliance with numerous construction and Building Code and Fire Code standards affecting structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, building sprinkler systems, etc. Therefore, the Project would not result in the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. **Therefore, impacts to fire protection would be less than significant,**

and no mitigation measures are required. No further analysis of this topic in the EIR is required.

### Project Design Features

**Project Design Feature FIR-PDF-1:** The Project will install automatic fire sprinklers in all interior spaces of the proposed building.

#### *b) Police protection*

**Less Than Significant Impact.** The Central Community Police Station, which serves the Project area, is located at 251 East 6th Street, approximately 0.4 mile west of the Project Site. This station is under the jurisdiction of the LAPD's Central Bureau. The Central Community Police Station service area covers approximately 4.5 square miles, including the downtown communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artists Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District.<sup>80</sup> The Central Community Police Station service area is bounded by Stadium Way and the Pasadena Freeway to the north, Washington Boulevard and 7th Street to the south, the Los Angeles River to the east, and the Harbor Freeway to the west.<sup>81</sup> The Central Community Police Station serves a population of approximately 40,000 residents and is staffed by approximately 400 sworn officers and civilian support staff.<sup>82</sup>

With regard to construction, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Given the existing Project Site operations and in accordance with standard construction industry practices, the potential for theft of construction equipment and building materials would be minimized through the use of security fencing, lighting, locked entry, and security patrol of the Project Site and construction areas.

Construction of the Project could also potentially impact the provision of LAPD police protection services and police response in the vicinity of the Project Site as a result of construction impacts on the surrounding roadways. Specifically, access to the Project Site and the surrounding vicinity could be impacted by construction activities, including utility line

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<sup>80</sup> City of Los Angeles, Los Angeles Police Department, About Central Area, [www.lapdonline.org/central\\_community\\_police\\_station/content\\_basic\\_view/1681](http://www.lapdonline.org/central_community_police_station/content_basic_view/1681), accessed November 27, 2017.

<sup>81</sup> City of Los Angeles, Los Angeles Police Department, Street Map of Central Community Police Station, [www.lapdonline.org/central\\_community\\_police\\_station/content\\_basic\\_view/1681](http://www.lapdonline.org/central_community_police_station/content_basic_view/1681), accessed November 27, 2017.

<sup>82</sup> City of Los Angeles, Los Angeles Police Department, About Central Area, website: [www.lapdonline.org/central\\_community\\_police\\_station/content\\_basic\\_view/1681](http://www.lapdonline.org/central_community_police_station/content_basic_view/1681), accessed November 27, 2017.

connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of demolition and graded materials, and construction worker trips. However, during construction of the Project, a construction traffic management plan, as required by Project Design Feature TR-PDF-1, below, would be implemented to ensure that adequate and safe access remains available at the Project Site during construction activities. As part of this plan, provisions for temporary traffic control would be provided during all construction activities along public rights-of-way to improve traffic flow on public roadways (e.g., flaggers). In addition, designated truck queuing, equipment staging, and construction worker parking areas would be provided. Given the permitted hours of construction and nature of construction projects, most of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. Further, pursuant to CVC Section 21806, the drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic.

As discussed in Attachment A, Project Description, of this Initial Study, the Project would demolish the existing residential building, which contains 47 units, and replace this building with a residential building containing 51 units. Both the existing building and proposed building include one occupant per dwelling unit.<sup>83</sup> Thus, the day time population on the Project Site would increase by four people. This is a minimal increase that would marginally affect the existing officer-to-resident ratio or crimes-per-resident ratio citywide or within the Central Community Police Station service area. Notwithstanding, to help reduce any on-site increase in demand for police services, the Project would implement security measures as part of the Project. Specifically, as discussed in Attachment A, Project Description, of this Initial Study, the entrance and exit points for the proposed building would have controlled access and would only allow admittance to residents and staff. From the entrance, visitors and guests would need to call the Property Management Office for admittance. The Property Management Office would be located at the entrance in order to have direct line-of-sight to the street and would have a monitor displaying security camera feeds for the entrance of the building, common areas, the public sidewalk in front of the building, and all other cameras on the Project Site. The common areas would be oriented for maximum visibility. Security cameras would be placed at entrances, exits, and common areas, and recordings would be maintained for at least 30 days. A written policy for this Project will be developed regarding the use of the cameras in order to specify who has access to see the videos, who monitors the surveillance, and under what conditions the footage would be released to authorities. Safety lighting would be included to reduce blind spots or dark spaces throughout the building. Furthermore, property management would include a 24-hour hotline for non-emergency matters. In addition to the manager living

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<sup>83</sup> *The residential units proposed under the Project are Restricted Affordable Efficiency Dwelling units, and, therefore, would only have one person per unit.*

on-site, the building would be regularly patrolled by security guards under contract with the Applicant.

With regard to emergency access and response times during operation, the Project would not include the permanent closure of any adjacent roads or install barriers along the adjacent roads, which could impede emergency access. In addition, the drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Thus, Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Based on the above analysis, the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the Central Community Police Station to serve the Project Site. Therefore, the Project would not necessitate the provision of new or physically altered police stations, the construction of which could cause significant impacts, in order to maintain acceptable service. **Impacts to police protection service would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

### c) Schools

**Less Than Significant Impact.** The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.<sup>84</sup> The Project Site is located in Local District–Central.<sup>85</sup> The nearest school to the Project Site is 9th Street Elementary School, located approximately 0.53 mile south of the Project Site at 835 Stanford Avenue. As discussed in Attachment A, Project Description, of this Initial Study, the Project would include 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units and one manager’s unit. While the Project would include residential uses, these residential units are not the types of residential uses that would generate school-aged children and a corresponding demand for school services in the vicinity of the Project Site.<sup>86</sup> Therefore, the development of the Project would not directly increase the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the

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<sup>84</sup> Los Angeles Unified School District, Board of Education Districts Maps 2015-2016, <http://achieve.lausd.net/Page/8652>, accessed November 27, 2017.

<sup>85</sup> Los Angeles Unified School District, Board of Education Local District—Central Map, July 2015.

<sup>86</sup> The residential units proposed by the Project are Restricted Affordable Efficiency Dwelling units, and, therefore, would only have one person per unit.

issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. **Therefore, with adherence to existing regulations, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.**

#### d) Parks

**Less Than Significant Impact.** Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Gladys Park (located 0.2 mile south of the Project Site); Arts District Park (located 0.6 mile east of the Project Site); Spring Street Park (located 0.6 mile northwest of the Project Site); City Hall Park Center (located 0.8 mile northwest of the Project Site); Pershing Square Park (located 0.8 mile west of the Project Site); Los Angeles Plaza Park (a.k.a. Father Serra Park) (located 1.1 miles north of the Project Site); Aliso Pico Recreation Center (located 1.2 miles east of the Project Site); Grand Park (located 1.2 miles northwest of the Project Site); Grand Hope Park (located 1.4 miles east of the Project Site); Pecan Pool and Recreation Center (located 1.4 miles east of the Project Site); Ord and Yale Street Park (located 1.5 miles north of the Project Site); Miguel Contreras Learning Center Pool (located 1.7 miles northwest of the Project Site); Hollenbeck Park & Recreation Center (located 1.8 miles east of the Project Site); Alpine Recreation Center (located 1.8 miles north of the Project Site); Central Park Recreation Center & Pool (located 1.8 miles south of the Project Site); Vista Hermosa Soccer Field (located 1.8 miles northwest of the Project Site); and Ross Valencia Community Park (located 1.9 miles east of the Project Site).

As discussed in Attachment A, Project Description, of this Initial Study, the Project would include 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units and one manager's unit. Both the existing building and proposed building include one occupant per dwelling unit. This would result in a net increase of four persons. As required by LAMC Section 12.21-G, the required open space for the Project would be 5,125 square feet. However, as permitted by LAMC Section 12.22 A 29 (c)(2)<sup>87</sup>, a 50-percent reduction is permitted for projects within the Greater Downtown Housing Incentive Area. This would reduce the required open space to 2,562.5 square feet. In addition, the allowed maximum interior space is calculated to be 25 percent of the required open space, or

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<sup>87</sup> LAMC Section 12.22 A 29 (c)(2) allows the reduction of open space by one-half provided that a fee equivalent to the amount of the relevant Quimby park and recreation fee shall be paid for all dwelling units in a project regardless of whether a park and recreation fee is otherwise required.

1,281.3 square feet. The Project would provide 2,562.5 square feet of open space, which would consist of 1,282.5 square feet of exterior common open space provided on the roof top and 1,280 square feet of interior common open space. The roof deck would include two outdoor sky terraces, a flex/community room, and various recreational program elements, such as a vegetable garden, ping pong tables, outdoor seating, and BBQ area for residents. Floor 2 would also include a small patio for use by the residents. The remaining interior common open space would be provided on the ground floor and include a resident amenity area equipped with a kitchen, and on Floor 2 in a residents' lounge. Furthermore, as part of the Project, one Callery pear tree located in the sidewalk in front of the Project Site along 5th Street would be removed to accommodate the development of the Project. However, in accordance with the requirements and policies of the City's Urban Forestry Division, two replacement trees and shrubs would be planted on the ground level and in the sidewalk. In addition, the roof deck would be landscaped with a variety of planters, six trees, and a vegetable garden. Therefore, based on the above, the Project would provide the required open space as set forth in LAMC Section 12.21-G and the 50-percent reduction provided for projects within the Greater Downtown Housing Incentive Area.

Due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that project residents would often utilize on-site open space to meet their recreational needs. While the Project's residents would be expected to use off-site public parks and recreational facilities to some degree, there are numerous parks and recreational facilities in the Project area. Thus, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

In addition, while it is possible that some of the new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the minimal increase in employees. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited.

**Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities and would not require the provision of new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts. Thus, impacts on parks would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.**

### e) *Other public facilities*

**Less Than Significant Impact.** Other public facilities available to future occupants of the Project include library services, roads, transit, utility systems, including water and sewer infrastructure, as well as other general public facilities.

The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.<sup>88</sup> The Project area is served by existing libraries within the Central City Community Plan area, including the Little Tokyo Branch Library, located at 203 S. Los Angeles Street, approximately 0.7 mile north of the Project Site, and the Central Library, located at 630 West 5th Street, approximately 1 mile west of the Project Site. The Little Tokyo Branch Library is comprised of 12,500 square feet, while the Central Library is comprised of 500,000 square feet.

As previously discussed, the Project would demolish the existing residential building, which contains 47 units, and construct a residential building containing 51 units. Both the existing building and proposed building include one occupant per dwelling unit. This would result in a net increase of four residents.<sup>89</sup> This is a minimal increase in the number of residents within the service population of the Little Tokyo Branch Library and Central Library. The Project would generate approximately four full-time equivalent (FTE) employees based on information provided by the Applicant. The existing residential uses currently employ two FTE employees. Therefore, the Project would have a net increase of two FTE employees. In addition, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. As such, any indirect or direct demand for library services generated by Project employees would be negligible. **The Project would not substantially increase the demand for library facilities and would not require the provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. Therefore, impacts on library facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.**

During construction and operation of the Project, roads would continue to be utilized to access the Project Site. As discussed below in Checklist Question XVI.a, the potential for the

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<sup>88</sup> *Los Angeles Public Library, Library Directory.*

<sup>89</sup> *The residential units proposed under the Project are Restricted Affordable Efficiency Dwelling units, and, therefore, would only have one person per unit.*

Project to result in a significant increase in the number of vehicle trips on local roadways would be less than significant.

No other public services would be notably impacted by the Project. **Therefore, the Project would result in a less than significant impact on other public services, and no mitigation measures are required. No further analysis of this issue in an EIR is required.**

## XV. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Would the Project:*

***a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?***

**Less Than Significant Impact.** As described above in Response to Checklist Question XIV.d, many public parks and recreational facilities are located in the vicinity of the Project Site. While the minor population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs. The Project would provide 2,562.5 square feet of open space, which would consist of 1,282.5 square feet of exterior common open space provided on the roof top and 1,280 square feet of interior common open space. The roof deck would include two outdoor sky terraces, a flex/community room, and various recreational program elements, such as a vegetable garden, ping pong tables, outdoor seating, and BBQ area for residents. Floor 2 would also include a small patio for use by the residents. The remaining interior

common open space would be provided on the ground floor and include a resident amenity area equipped with a kitchen, and on Floor 2 in a residents' lounge on Floor 2.

Therefore, while Project residents would be expected to use off-site public parks and recreational facilities to some degree, that use would be spread among the many parks and recreational facilities in the vicinity of the Project Site, and the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

In addition, while it is possible that some of the new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the minimal increase in employees. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited.

**Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** The Project would not include the development of recreational facilities or require the expansion of recreational facilities which might have an adverse physical effect on the environment, as discussed above in Response to Checklist Question XIV.d. **Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## XVI. Transportation/Traffic

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based, in part, on the *Transportation Assessment of 713 E. 5th Street Project* (Transportation Memo) prepared for the Project by Fehr and Peers, dated December 8, 2017. This report is included as Appendix IS-10 of this Initial Study.

*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?**

**Less Than Significant Impact.** The Project would involve the demolition of the existing residential building, which contains 47 units, and replace this building with a residential building containing 51 units.

## **1. Construction Impacts**

Construction of the Project has the potential to increase traffic through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Construction of the Project would commence with demolition of the existing building, followed by grading. As noted above, the Project would only involve surficial grading, including 740 cubic yards of soil (370 cubic yards of import and 370 cubic yards of export associated with building foundations and footings). Building foundations would then be laid, followed by building construction, and landscape installation. Project construction is anticipated to occur over a 24-month period and be completed in 2021.

### **a. Construction Truck Trips**

Peak hauling activity is anticipated to occur during the first phase of construction when demolition would occur. In addition to haul trucks, construction of the Project would also involve equipment and delivery trucks during each phase of construction. However, it is anticipated that almost all haul truck activity to and from the Project Site would occur outside of the A.M. and P.M. peak hours. Haul trucks would travel on approved truck routes designated within the City. It is anticipated that the primary haul routes to and from the Project Site would include use of Alameda Street to either I-10 to the south or US-101 to the north.

### **b. Temporary Impacts of Construction Activities**

#### *(1) Construction Traffic Management Plan*

A detailed construction traffic management plan, as provided for by Project Design Feature TR-PDF-1, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval. Flagmen will be used to control traffic movement during the ingress and egress of trucks and heavy equipment. The construction traffic management plan would formalize how construction

would be carried out and identify specific actions that would be required to reduce traffic impacts on the surrounding community. The construction traffic management plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and would include, but not be limited to, the following elements, as appropriate:

- Advance notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.
- Prohibition of construction worker parking on adjacent residential streets.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Construction-related vehicles shall not park on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate.
- Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.
- Advanced notification of temporary parking removals and duration of removals.
- Detour plans to address temporary road closures during construction.

### c. Access and Safety Impacts

With regard to access during construction, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site on 5th Street. On-street parking would not be impacted as on-street parking is not currently permitted along the north side of 5th Street. As discussed in the Transportation Memo, provided in Appendix IS-10 of this Initial Study, the temporary construction impacts on the roadway network would temporarily close only one of three westbound lanes of travel on 5th Street (one-way westward).<sup>90</sup> Furthermore, temporary traffic controls would be provided to direct traffic around any closures as required in the construction traffic management plan to be implemented as part of the Project. The use of the public right-of-way on 5th Street may

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<sup>90</sup> *Fehr and Peers, Transportation Assessment of 713 E. 5th Street Project, December 8, 2017. See Appendix IS-10, of this Initial Study.*

result in sidewalk closures that may cause the temporary rerouting of pedestrian traffic. However, a construction traffic management plan, as required by Project Design Feature TR-PDF-1, below, would include measures to ensure pedestrian and bicyclist safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). As such, Project construction is not expected to affect pedestrian access to adjacent land uses.

### *(1) Construction Worker Trips and Parking*

Most of the construction worker trips to and from the Project Site would also occur outside of the A.M. and P.M. peak hours, thereby reducing the potential for traffic-related conflicts. Therefore, no peak-hour construction traffic impacts are expected during the demolition phase of construction. As discussed above, parking is not permitted along 5th Street on the north side of the street. With regard to vehicular access, the primary access location for construction on the Project Site is from 5th Street. Specifically, during construction, the 20-foot curb travel lane on 5th Street in front of the Project Site is anticipated to be closed for a portion or all of the construction period to accommodate the construction area footprint and/or temporary truck staging. However, on-street parking would not be impacted as on-street parking is not currently permitted along the Project frontage. The Project's Worksite Traffic Control Plan would also ensure that adequate and safe access remains available within and near the Project Site during construction activities.

Additionally, adequate parking for construction workers would be secured in the vicinity of the Project Site. Restrictions against workers parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site will be identified as part of the construction traffic management plan to be implemented as part of the Project.

### *(2) Bus and Transit Impacts*

A Los Angeles County Metropolitan Transportation Authority (Metro) bus stop is located on 5th Street at the northeastern corner of 5th Street and Towne Avenue adjacent to where the curb lane closures would occur. It is not anticipated that construction would affect bus operations since the Project Site is not directly in front of the bus stop. If bus stop relocation is necessary, Metro would be consulted for advisement on an acceptable replacement location. Therefore, construction impacts on transit operations would be less than significant.

In summary, construction of the Project is not expected to create hazards for roadway travelers, bus riders, or pedestrians, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) have been incorporated into the construction traffic management plan, as described below. **Therefore, construction-related**

impacts associated with access, parking, pedestrian, and transit are anticipated to be less than significant.

## 2. Operational Impacts

5th Street is classified as an Avenue II and the adjacent side streets of Towne Avenue and Stanford Avenue are classified as collector streets. The residents that would occupy the proposed Restricted Affordable Efficiency Dwelling units on the Project Site would not use cars. The Project would include one designated parking space for the manager's unit, and this parking space would be accessed from the alley directly adjacent to and north of the Project Site, which connects to Stanford Avenue, east of the Project Site. There would be no other vehicular access to the Project Site.

The Project's proposed uses would not substantially increase traffic to warrant the preparation of a traffic study.<sup>91</sup> As discussed in the Transportation Memo, provided in Appendix IS-10 of this Initial Study, while the Project would provide a net of four new residential units, the Project is expected to generate five net new daily trips but negligible net new trips during both the A.M. and P.M. commuter peak hours. As the Project is not expected to generate a noticeable increase in new trips during either the A.M. or P.M. commuter peak hours, this number of net new daily trips is below the thresholds identified by the City of Los Angeles (43) and Los Angeles Congestion Management Plan (50) for study. The thresholds identified by these two agencies were developed to limit traffic studies to locations where there is a potential for traffic impacts. **As the Project would only generate five net trips and negligible peak hour trips, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

**Therefore, based on the above, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

### Project Design Features

**Project Design Feature TR-PDF-1:** Prior to the start of construction, the Applicant will prepare a construction traffic management plan and submit it to the Los Angeles Department of Transportation for review and approval. The

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<sup>91</sup> *E-mail correspondence with Wes Pringle, Metro Development Review. See Appendix IS-11 of this Initial Study.*

construction traffic management plan will identify the location of any temporary street parking or sidewalk closures, provide for the posting of signs advising pedestrians of temporary sidewalk closures and providing alternative routes, provide for the installation of other construction-related warning signs, and show access to abutting properties.

***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?***

**Less Than Significant Impact.** Metro administers the Congestion Management Program (CMP), which is a State-mandated program designed to address the impacts urban congestion has on local communities and on the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. As discussed in Checklist Question No. XVI.a., above, the Project's proposed uses would not substantially increase traffic to warrant the preparation of a traffic study. Therefore, implementation of the Project would not add more than 50 trips to the identified roadway CMP or more than 150 trips to mainline freeway CMP location in either direction during either the A.M. or P.M. weekday peak hours. **Impacts related to the applicable congestion management program would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

***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?***

**No Impact.** The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. In addition, the Project's maximum height of 102 feet would not create increased levels of risk with respect to air traffic. **Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**No Impact.** The Project's design does not include hazardous features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed uses would be consistent with the existing and surrounding

uses. **Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** 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, the remaining travel lanes would be maintained in accordance with the construction traffic management plan that would be implemented to ensure adequate circulation and emergency access. Specifically, during construction, the 20-foot curb travel lane on 5th Street in front of the Project Site is anticipated to be closed for a portion or all of the construction period. As identified in the Transportation Memo, the closure of one of three lanes on 5th Street would not be considered significant as the two remaining lanes would be more than adequate to serve existing and future traffic volumes. In addition, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. **Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to emergency access would be less than significant.**

As discussed in Checklist Question No. XVI.a., above, the Project's proposed uses would not substantially increase traffic to warrant the preparation of a traffic study. In addition, the Project would be designed to incorporate all City Building Code, Fire Code, and LADOT requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118 and which are required prior to the issuance of a building permit. Moreover, based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. The street system surrounding the Project Site is not considered substandard. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, the Project would not result in inadequate emergency access. **Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

**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?**

**Less Than Significant Impact.** As described in Response to Checklist Question No. XVI.a, above, the development of the Project would have no adverse significant impacts to either existing or planned public transit, bicycle, or pedestrian facilities in the vicinity of the Project Site.

A construction traffic management plan, as required by Project Design Feature TR-PDF-1, would include measures to ensure pedestrian and bicyclist safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). As such, Project construction is not expected to affect pedestrian access to adjacent land uses.

In addition, the Project would comply with LAMC requirements with regard to bicycle parking and pedestrian access. **Therefore, the Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## XVII. Tribal Cultural Resources

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the Project:

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Would the Project:*

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

***a.ii) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

**Potentially Significant Impacts.** Approved by Governor Jerry 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 noted above, the Project would only involve surficial grading, including 740 cubic yards of soil (370 cubic yards of import and 370 cubic yards of export associated with building foundations and footings). As there would be some grading and earth movement, 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 City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.**

## XVIII. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Would the Project:*

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

**Less Than Significant Impact.** Wastewater collection and treatment services within the Project vicinity are provided by the City of Los Angeles Department of Public Works (LADPW). Wastewater generated during Project operation would continue to be collected and discharged into the existing 8-inch sewer main in 5th Street<sup>92</sup> and conveyed to the Hyperion Treatment Plant (HTP) located in Playa Del Rey. The HTP is part of the Hyperion Service Area, which also includes the Tillman Water Reclamation Plant (TWRP), and the Los Angeles–Glendale Water Reclamation Plant (LAGWRP). The treatment capacity of the entire Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 million gallons per day at the HTP, 80 million gallons per day at TWRP Plant, and 20 million gallons per day at LAGWRP).<sup>93</sup> The HTP is designed to treat approximately 450 million gallons per day of wastewater for full secondary treatment and currently treats approximately 275 million

<sup>92</sup> City of Los Angeles, *Sewer Capacity Availability Request (SCAR) for the 713 East 5th Street Project*. See Appendix IS-12 of this Initial Study.

<sup>93</sup> LASAN, *Wastewater System Fact Sheet*.

gallons per day.<sup>94</sup> As such, the HTP is currently operating at approximately 61 percent of its capacity, with a remaining available capacity of approximately 175 million gallons per day.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.<sup>95</sup> Treated water from the HTP is discharged through an outfall pipe five miles into the Santa Monica Bay and Pacific Ocean.<sup>96</sup> The discharge from the HTP into Santa Monica Bay is regulated by the Hyperion Water Reclamation Plant's National Pollutant Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use.<sup>97</sup> Accordingly, the HTP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed water quality standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.<sup>98</sup>

The wastewater generated by the Project would be typical of residential and residential supportive service uses. No industrial discharge into the wastewater system would occur. As the HTP is in compliance with the state's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the RWQCB. **Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

<sup>94</sup> LASAN, Hyperion Water Reclamation Plant, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=grj40dmqj\\_1780&\\_afLoop=3950078628628745#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afLoop=3950078628628745#!), accessed December 5, 2017.

<sup>95</sup> LASAN, Hyperion Water Reclamation Plant, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=grj40dmqj\\_1780&\\_afLoop=3950078628628745#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afLoop=3950078628628745#!), accessed December 5, 2017.

<sup>96</sup> California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

<sup>97</sup> California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

<sup>98</sup> LASAN, Environmental Monitoring, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-wp-ec-em?\\_adf.ctrl-state=xsm2kqwx\\_131&\\_afLoop=21105064772207683#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em?_adf.ctrl-state=xsm2kqwx_131&_afLoop=21105064772207683#!), accessed December 5, 2017.

**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?**

**Less Than Significant Impact.** Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. An analysis of the Project's impacts on these systems is provided below.

## **Water**

The Los Angeles Department of Water and Power (LADWP) provides water service for domestic and fire protection uses. While domestic water demand is typically the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and, therefore, are the primary means for analyzing infrastructure capacity. The Project Site is located in proximity to four fire hydrants.<sup>99</sup> As shown in Table B-1 on page B-84, the Project is estimated to consume a net of approximately 2,177 gallons per day of water upon completion. LAMC Section 57.507.3.1 establishes the fire flow standard by development type. The Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gpm from four hydrants flowing simultaneously. Additionally, hydrants will be spaced per requirements set forth in LAMC Section 57.09.06, to provide adequate coverage of the building exterior and to deliver a minimum pressure of 20 pounds per square inch at full flow. In accordance with the fire flow standards set forth in the LAMC, the Applicant will coordinate with the City to ensure that adequate water infrastructure is available to meet the required fire flows. Should the City determine that additional water connections and water infrastructure capacity is needed to meet the required fire flows, the Applicant will implement such improvements in consultation with the City.

Pressure flow reports were obtained from LADWP to ensure that existing water pressure is sufficient to serve the fire flow needs of the Project. The approved Service Advisory Request (SAR) provided by the LADWP and included in Appendix IS-13 of this Initial Study, confirms that sufficient infrastructure capacity is provided to the existing water mains to serve the Project, and no upgrades to the mainlines that serve the Project Site would be required. Domestic water demand is the main contributor to water consumption; however, fire demands have a greater instantaneous impact on infrastructure. Thus, the SARs are processed using the projected water demands and demonstrate that there is an existing static pressure of greater than 20 psi and therefore, the water infrastructure can meet

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<sup>99</sup> City of Los Angeles, GeoHub, Fire Hydrants, [http://geohub.lacity.org/datasets/39e5c79ddd8a4eada40340f6ceb08fae\\_0?geometry=-118.251%2C34.042%2C-118.231%2C34.045](http://geohub.lacity.org/datasets/39e5c79ddd8a4eada40340f6ceb08fae_0?geometry=-118.251%2C34.042%2C-118.231%2C34.045), accessed May 1, 2018.

**Table B-1  
Estimated Project Water Consumption and Wastewater Generation**

<b>Land Use</b>	<b>No. of Units/ Floor Area</b>	<b>Water Consumption/ Generation Rate (gpd/unit)<sup>a</sup></b>	<b>Total Water Consumption/ Wastewater Generation (gpd)</b>
<b>Existing</b>			
Residential Apartments—Studio	47 du	75 gpd/du	3,525
<b>Total Existing</b>			<b>3,525</b>
<b>Proposed</b>			
Residential Apartments—1 Bedroom	50 du	110 gpd/du	5,500
Residential Apartments—2 Bedroom	1 du	150 gpd/du	150
Office	433 sf	0.12 gpd/sf	52
<b>Total Proposed</b>			<b>5,702</b>
<b>Less Existing to be Removed</b>			<b>(3,525)</b>
<b>Net Water Consumption/ Wastewater Generation (Proposed – Existing)</b>			<b>2,177</b>
<hr/> <i>du = dwelling units</i> <i>sf = square feet</i> <i>gpd = gallons per day</i> <sup>a</sup> <i>Based on sewage generation rates provided by LA Sanitation (2012) and assumes that water consumption and wastewater generation are equivalent.</i> <i>Source: Eyestone Environmental, 2018.</i>			

the needs of the Project. Furthermore, as provided in Project Design Feature FIR-PDF-1, above in Response to Checklist Question XIV(a), the Project shall install automatic fire sprinklers in all interior spaces of the proposed building, which would help reduce the public hydrant demands. Project-related infrastructure would be designed and installed to meet all applicable City requirements.

## **Wastewater**

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HTP. As described above in Response to Checklist Question No. XVII.a, the HTP has a capacity of 450 million gallons per day. The HTP currently treats 275 million gallons per day and, therefore, has an available capacity of approximately 175 million gallons per day. As shown in Table B-1, based on sewage generation factors established by Department of Public Works, Bureau of Engineering, the Project is estimated to generate a net of approximately 2,177 gallons per day or approximately 0.0022 million gallons per day of wastewater upon completion. The Project's average daily wastewater flow of 0.0022 million gallons per day would represent approximately 0.0012 percent of the current 172 million gallons per day available capacity of

the HTP. Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HTP.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer main adjacent to the Project Site. Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable City and California Plumbing Code standards. Based on the Sewer Capacity Availability Request (SCAR), provided in Appendix IS-12, of this Initial Study, the existing sanitary sewer line in the vicinity of the Project Site (i.e., 5th Street) would have adequate capacity to accommodate the Project.

**Based on the above, the existing water and wastewater infrastructure is anticipated to have adequate capacity to serve the Project. Thus, impacts to water and wastewater treatment facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** As discussed above in Response to Checklist Question IX.a., the Project would implement BMPs on the Project Site in accordance with the City's LID requirements.

Specific on-site improvements would include the installation of several planter boxes on the rooftop and throughout the building that would serve to capture some of the stormwater from the Project Site as well as implementation of BMPs to reduce stormwater pollution on the Project Site in accordance with the City's LID requirements. Implementation of BMPs would be beneficial to the Project Site as the Project Site is 100 percent impermeable and currently does not include BMPs. **Therefore, the Project would not require or result in the construction of new off-site storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

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

**Less Than Significant Impact.** LADWP provides water service to the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, Metropolitan Water District of Southern California (MWD), and recycled water. LADWP's 2015 Urban Water Management Plan provides water supply and demand projections in five-year increments to 2040, based on demographic growth projections in

SCAG's 2012–2035 RTP/SCS. It is noted that since preparation of the 2015 Urban Water Management Plan, new growth forecasts have become available in SCAG's 2016–2040 RTP/SCS. The 2015 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Based on LADWP's 2015 Urban Water Management Plan water demand projections through 2040, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., the Project buildout year of 2021).

Consistent with LADWP's methodology, the Project's estimated water demand was calculated by applying the City's wastewater generation factors to the proposed land uses associated with the Project. As shown above in Table B-1 on page B-84, the Project would use a net of approximately 2,177 gallons per day of water during average flows. It should be noted that the Project's estimated water demand is conservative as it does not account for water conservation features. Specifically, the Project would comply with the LAMC requirements regarding water conservation, which include various water efficiency requirements and installation of high efficiency plumbing fixtures. Therefore, the actual net increase in water demand generated by the Project would be less than what was conservatively estimated (i.e., 2,177 gallons per day). As concluded in LADWP's 2015 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., 2021). Therefore, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area.

**Based on the above, it is anticipated that sufficient water supplies would be available to serve the Project, and no new or expanded water entitlements would be needed. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

***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?***

**Less Than Significant Impact.** As discussed above in Response to Checklist Question No. XVIII.b, wastewater generated during Project operation would be collected and discharged into the existing sewer main and conveyed to the HTP. Based on the amount of wastewater expected to be generated by the Project and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. **As such, the Project would have a less than significant impact with respect to wastewater treatment and**

infrastructure, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.<sup>100</sup> Ten Class III landfills and one unclassified landfill with solid waste facility permits are currently operating within the County.<sup>101</sup> In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2017, the City of Los Angeles disposed of approximately 1.79 million tons of solid waste at the County's Class III landfills and approximately 17,405 tons at transformation facilities.<sup>102,103</sup> The 1.79 million tons of solid waste accounts for approximately 2.27 percent of the total remaining capacity (78.71 million tons) for the County's Class III landfills open to the City.<sup>104,105</sup>

The unclassified landfill serving the County is Azusa Land Reclamation. This facility currently has 56.34 million tons of remaining capacity.<sup>106</sup>

<sup>100</sup> *Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.*

<sup>101</sup> *County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.*

<sup>102</sup> *These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.*

<sup>103</sup> *County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2017 to December 2017).*

<sup>104</sup>  $(1.79 \text{ million tons} \div 78.71 \text{ million tons}) \times 100 = 2.27 \text{ percent.}$

<sup>105</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.*

<sup>106</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.*

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.<sup>107</sup> Based on the most recent 2016 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 103.18 million tons.<sup>108</sup>

Based on the 2016 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2031 will not exceed the 2016 remaining permitted Class III landfill capacity of 103 million tons. The County, therefore, has disposal capacity beyond the Project's buildout year of 2021. Nonetheless, while there is no expected daily landfill capacity shortfall during the planning period, there are constraints that may limit the accessibility of Class III landfill capacity. These constraints include washed boundaries, geographic barriers, weather, and natural disasters. Therefore, the 2016 CoIWMP Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The 2016 CoIWMP Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.<sup>109</sup> The City of Los Angeles is currently diverting 76 percent of its waste from landfills.<sup>110</sup> The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

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<sup>107</sup> County of Los Angeles, Department of Public Works. *Los Angeles County Integrated Waste Management Plan 2016 Annual Report*, September 2017.

<sup>108</sup> This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.

<sup>109</sup> City of Los Angeles, *Solid Waste Integrated Resource Plan FAQ*.

<sup>110</sup> LA Sanitation, Recycling, [www.lacitysan.org/san/faces/home/portal/s-Ish-wwd/s-Ish-wwd-s/s-Ish-wwd-s-r?\\_adf.ctrl-state=alxbkb91s\\_4&\\_afrcLoop=18850686489149411#!](http://www.lacitysan.org/san/faces/home/portal/s-Ish-wwd/s-Ish-wwd-s/s-Ish-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrcLoop=18850686489149411#!), accessed December 5, 2017.



**Table B-2  
Project Demolition and Construction Waste Generation**

<b>Building</b>	<b>Size</b>	<b>Generation Rate (lbs/sf)<sup>a,b</sup></b>	<b>Total (tons)<sup>b</sup></b>
<b>Construction Waste</b>			
Residential (51 du)	32,574 sf	4.38	71
Office	433 sf	3.89	1
<b>Demolition Waste</b>			
Residential removed	14,475 sf	155	1,122
<b>Total for Construction and Demolition Waste</b>			<b>1,194</b>
<b>Total After 75-Percent Recycling</b>			<b>298</b>
<hr/> <i>du = dwelling unit</i> <i>lb = pound</i> <i>sf = square feet</i> <sup>a</sup> U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.</i> <sup>b</sup> Numbers have been rounded. Source: Eyestone Environmental, 2018.			

would, therefore, represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

**Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

**Table B-3  
Estimated Project Solid Waste Generation**

<b>Building</b>	<b>Size</b>	<b>Employee Generation Rate per sf<sup>a</sup></b>	<b>Estimated No. of Employees</b>	<b>Solid Waste Generation Rate<sup>b</sup></b>	<b>Total Generation (tons/year)<sup>c</sup></b>
<b>Existing</b>					
Residential (47 du)	47 du	N/A	N/A	2.23/du/yr	105
<b>Total Existing</b>					<b>105</b>
<b>Proposed</b>					
Residential (51 du)	51 du	N/A	N/A	2.23/du/yr	114
Office	433 sf	0.00479	2	0.37 tons/emp/yr	1
<b>Total with Implementation of Project</b>					<b>115</b>
<b>Total Net Increase</b>					<b>10</b>
<p><i>du = dwelling unit</i>  <i>emp = employee</i>  <i>lb = pound</i>  <i>sf = square feet</i></p> <p><sup>a</sup> <i>Employee Generation Rates from Los Angeles Unified School District Developer Fee Justification Study, March 2017, Table 14.</i></p> <p><sup>b</sup> <i>Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. City CEQA Thresholds Guide.</i></p> <p><sup>c</sup> <i>Numbers have been rounded.</i></p> <p><i>Source: Eyestone Environmental, 2018.</i></p>					

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

**Less Than Significant Impact.** Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City,

resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas on the ground floor (see Figure A-4 in Attachment A for further details) in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687), which requires that development projects include an on-site recycling area or room of specified size.<sup>115</sup> The Project would also comply with AB 939, AB 341, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. **Since the Project would comply with federal, state, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.**

## XIX. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the project:				
a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>115</sup> Ordinance No. 171687, adopted by the Los Angeles City Council on August 6, 1997.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. However, the Project does have the potential to degrade the quality of the environment or affect important examples of prehistory by demolishing a contributor to the Fifth Street Single Room Occupancy Historic District. **Therefore, further evaluation of this topic will be provided in the 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 the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; historical resources; GHG emissions; land use and planning; noise, tribal cultural resources, and energy infrastructure and conservation (CEQA Guidelines Appendix F).

With regard to cumulative effects with respect to aesthetics, agricultural resources, biological resources, cultural resources (archaeological and paleontological resources and human remains); geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, public services (fire protection, police protection, schools, parks, and other public facilities); recreation; transportation/traffic; and

utilities (water, wastewater, and solid waste), the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. **As the following analysis indicates, due to the distance of most of the related projects from the Project Site and specific on-site and surrounding conditions, the Project would not result in significant cumulative impacts for any of the environmental issue areas.**

- **Aesthetics**—Pursuant to SB 743 and ZI No. 2452, the Project's impacts would not be significant. Furthermore, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Thus, Project impacts associated with aesthetics would not be cumulatively considerable and would be less than significant.
- **Agriculture and Forestry Resources**—The Project area is highly urbanized, and no agricultural lands or uses exist within and in the vicinity of the Project Site. In addition, the Project Site and vicinity are not designated as farmland, zoned for agricultural uses, or used for agricultural uses. The Project Site and vicinity are also not zoned for forest land and do not include any forest or timberland. Therefore, implementation of the Project and related projects would not convert farmland, forest land, or timberland. Thus, no cumulative impacts related to agricultural and forest resources would occur as a result of the Project.
- **Biological Resources**—Due to their site-specific nature, impacts on biological resources are typically assessed on a project-by-project basis. Notwithstanding, as discussed above, due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. As such, no special status species, or wetlands and habitats supporting such resources are found in the Project vicinity. In addition, no riparian or other sensitive natural communities or water bodies and federally protected wetlands currently exist in the Project vicinity. There are also no wildlife movement corridors within and in the vicinity of the Project Site. Furthermore, as with the Project, related projects would be required to comply with the City's Protected Tree Regulations and the Migratory Bird Treaty Act. Compliance with these regulatory requirements would similarly reduce any potential direct and indirect impacts associated with removal of protected tree species. Thus, Project impacts related to biological resources would not be cumulatively considerable and would be less than significant.
- **Cultural Resources**— Due to their site-specific nature, impacts related archaeological and paleontological resources and human remains are typically assessed on a project-by-project basis. The Project vicinity is located within an urbanized area that has been disturbed over time. In the event that archaeological resources and human remains are uncovered, each related project would be required to comply with regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that

mitigation measures would be established, as necessary, to address the potential for uncovering of paleontological resources. In addition, the Project does not include excavation of the Project Site. Therefore, Project impacts to archeological and paleontological resources and human remains would not be cumulatively considerable and would be less than significant.

- **Geology and Soils**—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, state, and federal regulations and standards for seismic safety. In addition, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or underlain by an existing fault and would not exacerbate any existing seismic environmental conditions. Thus, Project impacts related to geology and soils would not be cumulatively considerable and would be less than significant.
- **Hazards and Hazardous Materials**—Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials. As discussed above, the Phase I ESA did not identify any RECs, CRECs, or HRECs. Therefore, with adherence to such regulations, Project impacts with regard to hazards and hazardous materials would not be cumulatively considerable and would be less than significant.
- **Hydrology and Water Quality**—Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements. In addition, construction projects greater than 1 acre would be subject to NPDES permit requirements, including development of a Stormwater Pollution Prevention Plan, Standard Urban Stormwater Mitigation Plan requirements during operation, and other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, Project impacts related to hydrology and water quality would not be cumulatively considerable and would be less than significant.
- **Mineral Resources**—As the Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the CGS, the Project would not result in the loss of a locally-important mineral resource recovery

site. Therefore, no cumulative impacts associated with the loss of mineral resources would occur as a result of the Project.

- **Population and Housing**—As previously noted, the Project is a replacement project that would replace the existing 47-unit residential building with a 51-unit residential building. Therefore, the Project would not induce substantial population growth. Accordingly, the permanent residential population expected to be generated by the Project would be anticipated to be within the housing and population projections established for SCAG's City of Los Angeles Subregion. In addition, the Project Site and related project sites are located in an urbanized area with existing infrastructure, including roads, water, sewer, electricity, and natural gas, that is already in place to support such uses. Thus, Project impacts associated with population and housing would not be cumulatively considerable and would be less than significant.
- **Public Services and Recreation**— As previously noted, the Project is a replacement project that would replace the existing 47-unit residential building with a 51-unit residential building. Therefore, the Project would not be anticipated to contribute to a cumulative demand for fire services, police protection, schools, parks, recreation facilities, and libraries. In addition, over time, LAFD and the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's and the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. While not anticipated as a result of the Project, which is adding a net of four residential units over existing conditions, any new or expanded fire or police station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Project and related projects would contribute. Moreover, all of the related projects' plans would be reviewed by the LAFD and LAPD to ensure adequate fire flow capabilities, adequate emergency access, and sufficient security measures are implemented. As with the Project, related projects would also comply with LAFD requirements and Municipal Code requirements related to fire safety, access, and fire flow. Therefore, Project impacts to fire protection and police protection would not be cumulatively considerable and would be less than significant.

Additionally, as the Project would not result in any increase in the number of school children in the LAUSD school system, the Project would not generate an increased demand for new or physically altered school facilities. Also, some related projects would be required to pay a school developer impact fee, which would offset any potential impact to schools associated with the related projects. Similarly, the Project would not create a substantial demand on library services and facilities. Furthermore, the Project which is adding a net of four residential units over existing conditions, and the related projects would not be expected to result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the nearby

facilities would occur or be accelerated. The related projects would also be required to provide open space and recreational amenities or comply with the parks and open space requirements established by the Municipal Code, which would offset any potential impacts to parks and recreation facilities associated with development of related projects. Therefore, cumulative impacts with regard to schools would not occur as a result of the Project, and Project impacts to parks, recreation facilities, and libraries would not be cumulatively considerable and would be less than significant.

- **Transportation and Traffic**—The residents that would occupy the proposed Restricted Affordable Efficiency Dwelling units on the Project Site would not use cars and would, therefore, not increase traffic within the Project area. This is evidenced by the Project only providing one parking space to be used by the on-site manager. While the on-site manager and the counselors that would work at the Project would potentially generate new trips to the Project Site, the marginal increase in trip generation would not substantially increase traffic to warrant the preparation of a traffic study. Thus, the Project would not result in significant traffic impacts and would therefore not contribute substantially to cumulative traffic increases. Therefore, Project traffic impacts would not be cumulatively considerable and would be less than significant.
- **Utilities and Service System—Water, Wastewater, and Stormwater**—Due to shared urban infrastructure, the Project and related projects would cumulatively increase water consumption, wastewater generation, and stormwater discharge.

As concluded in LADWP's 2015 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040. Furthermore, with respect to additional growth within the LADWP service area, through LADWP's Urban Water Management Plan process, the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Therefore, LADWP would be able to supply the demands of the Project and related projects through 2040 and beyond. In addition, in accordance with the City's Green Building Ordinance, certain water conservation measures are required to be implemented by the City for new development. Such measures would reduce water use associated with the Project and related projects. As such, with compliance with the City's Green Building Ordinance, Project impacts on water supply would not be cumulatively considerable and would be less than significant.

Based on LASAN's reported average flow projections for the Hyperion Service Area, it is anticipated that the average flow in 2021 will be approximately 348.6 million gallons per day.<sup>116</sup> The projected flows in 2021 would be below the

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<sup>116</sup> *City of Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, April 2016, Exhibit 4D. According to LASAN, based on a straight-line interpolation of the projected flows for the Hyperion Service Area (which is comprised of the Hyperion Water Reclamation Plant, the Donald C Tillman* (Footnote continued on next page)

design capacity of approximately 550 million gallons per day for the Hyperion Service Area. Therefore, based on the future wastewater flow and the wastewater treatment capacity of the Hyperion Service Area, as well as the anticipated wastewater generation of the Project and related projects, sufficient wastewater treatment capacity would be available to serve the Project and related projects. In addition, the City would continue to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. New development projects occurring in the Project vicinity, including the related projects, would also be required to coordinate with the City of Los Angeles via a sewer capacity availability request to determine adequate sewer capacity. Also, new development projects would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Therefore, Project impacts on the wastewater treatment systems would not be cumulatively considerable and would be less than significant.

With regard to stormwater infrastructure, as with the Project, related projects would be required to comply with the requirements of the City's LID Ordinance. In accordance with the City's LID Ordinance, related projects would also implement BMPs to capture a specified amount of runoff within the Project Site and reduce the potential impact of increased runoff to existing drainage systems. Furthermore, utility system capacity must be demonstrated during the approval process for each related project, including through consultation with LADWP as the water provider within the City.

Based on the above, as the service providers conduct on-going evaluations to ensure that facilities are adequate to serve the forecasted growth of the community, Project impacts on these utilities would not be cumulatively considerable and would be less than significant.

- Utilities and Service System—Solid Waste**—The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. The Countywide demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP Annual Reports. Each CoIWMP Annual Report assesses future landfill disposal needs over a 15-year planning horizon. The 2016 CoIWMP Annual Report projects waste generation and available landfill capacity through 2031. Per the 2016 CoIWMP Annual Report, the forecasted 2021 waste generation volume for the County is approximately 29.7 million tons. The estimated Project generation net increase of approximately 10 tons of waste per year would represent only 0.000003 percent of the County waste generation of 29.7 million tons. As discussed above, the Project would generate an estimated net increase of approximately 10 tons of waste per

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*Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant) for Fiscal Year (FY) 2019/2020 (approximately 334 mgd) and FY 2024/2025 (approximately 407 mgd). The 2021 extrapolated value is calculated using FY 2019/2020 and FY 2024/2025 projections to find the average increase between years, and then applying that annual increase to 2021:  $((407 \text{ mgd} - 334 \text{ mgd}) \div 5) + 334 \text{ mgd} = 348.6 \text{ mgd}$ .*

year. Thus, the Project's contribution to the County's cumulative waste stream for the last forecasted year available would not be substantial. Furthermore, the County of Los Angeles conducts on-going evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, Project impacts with regards to solid waste would not be cumulatively considerable and would be less than significant.

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

**Potentially Significant Impact.** Based on the analysis contained in this Initial Study, the Project may have the potential to cause substantial adverse effects on human beings, either directly or indirectly, with regard to the following topics: air quality; GHG emissions; land use and planning; and noise. As a result, these potential effects will be analyzed further in the EIR.