CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

INITIAL STUDY

8th, Hope, and Grand Project

Case Number: ENV-2017-506-EIR

Project Location: 754 South Hope Street; 609, 611, 613, 615, 617, 619, 621, 623, 625 West 8th Street, Los Angeles, California 90017

Community Plan Area: Central City

Council District: 14—Huizar

Project Description: The Project would demolish the existing four-level parking structure and surface parking lot containing 324 parking spaces on the Project Site and would construct a mixed-use development on a 34,694-square-foot site located within the Central City Community Plan area of the City of Los Angeles. The Project includes up to 409 residential units and approximately 7,329 square feet of ground level commercial/ retail/restaurant uses. The Project would include 494 vehicle parking spaces within three subterranean and three above-grade parking levels that would utilize a mechanical lift system that is operated by an attendant. The proposed uses would be located within a 39-story building, including a five-story podium, and would have approximately 403,316 square feet of total floor area, a maximum height of 499 feet above ground level, and a proposed Floor Area Ratio (FAR) of 11.62:1.

The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4) and has a Community Plan designation of Regional Center Commercial. In accordance with the requirements of the LAMC, the Project would include a number of open space areas and recreational amenities, totaling 43,776 square feet spread over four levels.

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

PREPARED BY:
Eyestone Environmental

APPLICANT:
MFA 8th Grand and Hope LLC

August 2017

Initial Study

Table of Contents

Volume 1

Page

Volume 2

APPENDICES

Initial Study

List of Figures

Initial Study

List of Tables

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY
AND APPENDIX G CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	14—Huizar	August 23, 2017

RESPONSIBLE AGENCIES

Including, but not limited to, the Regional Water Quality Control Board and South Coast Air Quality Management District.

PROJECT TITLE/NO.	CASE NOS.
8th, Hope, and Grand	ENV-2017-506-EIR, CPC-2017-505-TDR-SPR, VTT-74876

PROJECT LOCATION

754 South Hope Street; 609, 611, 613, 615, 617, 619, 621, 623 625 West 8th Street, Los Angeles, California 90017

APPLICANT NAME AND ADDRESS	PHONE NUMBER
MFA 8th Grand and Hope LLC 1251 Avenue of the Americas, Suite 800, New York, NY 10020	(213) 223-2375

PROJECT DESCRIPTION:

The Project would demolish the existing four-level parking structure and surface parking lot containing 324 parking spaces on the Project Site and would construct a mixed-use development on a 34,694-square-foot site located within the Central City Community Plan area of the City of Los Angeles. The Project includes up to 409 residential units and approximately 7,329 square feet of ground level commercial/retail/restaurant uses. The Project would include 494 vehicle parking spaces within three subterranean and three above-ground parking levels that would utilize a mechanical lift system that is operated by an attendant. The proposed uses would be located within a 39-story building, including a five-story podium, and would have approximately 403,316 square feet of total floor area, a maximum height of 499 feet above ground level, and a proposed Floor Area Ratio (FAR) of 11.62:1.The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4) and has a Community Plan designation of Regional Center Commercial. In accordance with the requirements of the LAMC, the Project would include a number of open space areas and recreational amenities, totaling 43,776 square feet spread over four levels. A variety of trees, including, but not limited to, citrus, desert willow, and mimosa silk trees, as well as shrubs and ground cover, would be planted on Levels 5 and 38. In addition, as part of the Project, along the street frontages, a row of street trees would each be planted on Hope Street, 8th Street, and Grand Avenue. (For additional detail, see Attachment A).

ENVIRONMENTAL SETTING:

The Project Site is located in the Financial District of Downtown Los Angeles. Surrounding uses in the vicinity of the Project Site are similarly zoned and developed with commercial, retail, restaurant, and parking uses. The Project Site is specifically bounded by Hope Street to the west, 8th Street to the south, Grand Avenue to the east, and two parking structures to the north. Immediately to the north of the Project Site are two parking structures—an 8-story structure along Hope Street and a 5-level structure along Grand Avenue. Across Hope Street to the west of the Project Site is a recently renovated business/commercial development consisting of a department store, a hotel, gym, retail and restaurant uses, and an office tower. To the east of the Project Site is a mixed-use development consisting of a mid-rise residential complex with a ground floor market. To the south of the Project Site are multiple office/commercial buildings and other residential developments. In the Project vicinity, beyond these land uses are other high-rise commercial buildings and skyscrapers that are commercial, business, and residential in nature. Major arterials providing regional access to the Project vicinity include Grand Avenue, Figueroa Street, and Olympic Boulevard. The Metro 7th Street/Metro Center Station is located approximately 550 feet north of the Project Site. The Project Site is located approximately 1,700 feet from the closest freeway to the west (State Route 110/Harbor Freeway).

The Project Site is currently developed with a low-rise parking structure on the western half of the Project Site and a surface parking lot on the eastern half of the Project Site. The existing Project site is entirely paved and devoid of landscaping. To accommodate the new uses, the existing four-level parking structure and the surface parking lot would be demolished. (For additional detail, see Attachment A).

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

No.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- ☐ Aesthetics
- ☐ Agricultural and Forestry Resources
- ☒ Air Quality
- ☐ Biological Resources
- ☒ Cultural Resources
- ☐ Geology/Soils
- ☒ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology/Water Quality
- ☒ Land Use/Planning
- ☐ Mineral Resources
- ☒ Noise
- ☐ Population/Housing
- ☒ Public Services
- ☒ Recreation
- ☒ Transportation/Traffic
- ☒ Tribal Cultural Resources
- ☒ Utilities/Service Systems
- ☒ Mandatory Findings of Significance

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Jon Chang	Planning Assistant
PRINTED NAME	**TITLE**
	(213) 978-1914
SIGNATURE	**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 that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

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

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

    1) Earlier Analysis Used. Identify and state where they are available for review.
    2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    3) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9) The explanation of each issue should identify:

    1) The significance criteria or threshold, if any, used to evaluate each question; and
    2) The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒
II. AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the South Coast Air Quality Management District (SCAQMD) Plan or Congestion Management Plan?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
conservation plan?				
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	☐	☐	☒	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking, caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 existing environmental conditions?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment, caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☐	☒
IX. HYDROLOGY AND WATER QUALITY. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Conflict with applicable land use plan, policy or	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
elsewhere?				
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☒	☐	☐	☐
d. Parks?	☒	☐	☐	☐
e. Other public facilities?	☒	☐	☐	☐
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐
d. Substantially increase hazards to a design feature	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e. Result in inadequate emergency access?	☒	☐	☐	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐
XVII. TRIBAL CULTURAL RESOURCES.				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☒	☐	☐	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
demand in addition to the provider's existing commitments?				
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☒	☐	☐	☐
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Initial Study

Attachment A: Project Description

Project Summary

The Project would demolish the existing four-level parking structure and surface parking lot containing 324 parking spaces on the Project Site and would construct a mixed-use development on a 34,694-square-foot site located within the Central City Community Plan area of the City of Los Angeles. The Project includes up to 409 residential units and approximately 7,329 square feet of ground level commercial/retail/restaurant uses. The Project would include 494 vehicle parking spaces within three subterranean and three above-ground parking levels that would utilize a mechanical lift system that is operated by an attendant. The proposed uses would be located within a 39-story building, including a five story podium, and would have approximately 403,316 square feet of total floor area, a maximum height of 499 feet above ground level, and a proposed Floor Area Ratio (FAR) of 11.62:1.

The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4) and has a Community Plan designation of Regional Center Commercial. In accordance with the requirements of the LAMC, the Project would include a number of open space areas and recreational amenities, totaling 43,776 square feet spread over four levels.

A. Environmental Setting

1. Project Location

As shown in Figure A-1 on page A-2, the Project Site is located in the Financial District of Downtown Los Angeles within the Central City Community Plan area of the City of Los Angeles, approximately 14 miles east of the Pacific Ocean. Primary regional access is provided by State Route 110 (SR-110 or Harbor Freeway), which runs north-south approximately 0.3 mile west of the Project Site. The Project Site is specifically bounded by 8th Street to the south, Hope Street to the west, Grand Avenue to the east, and two parking structures to the north. Major arterials providing regional access to the Project vicinity include Grand Avenue, Figueroa Street, and Olympic Boulevard. The Project Site is located in a Transit Priority Area (TPA) (shown in Figure A-2 on page A-3), as defined by Senate Bill (SB) 743 and City Zoning Information (ZI) File No. 2452. In addition, the Metro 7th Street/Metro Center Station is located approximately 550 feet north of the Project Site. The Project Site is located approximately 1,700 feet from the closest freeway to the west (SR-110/Harbor Freeway).

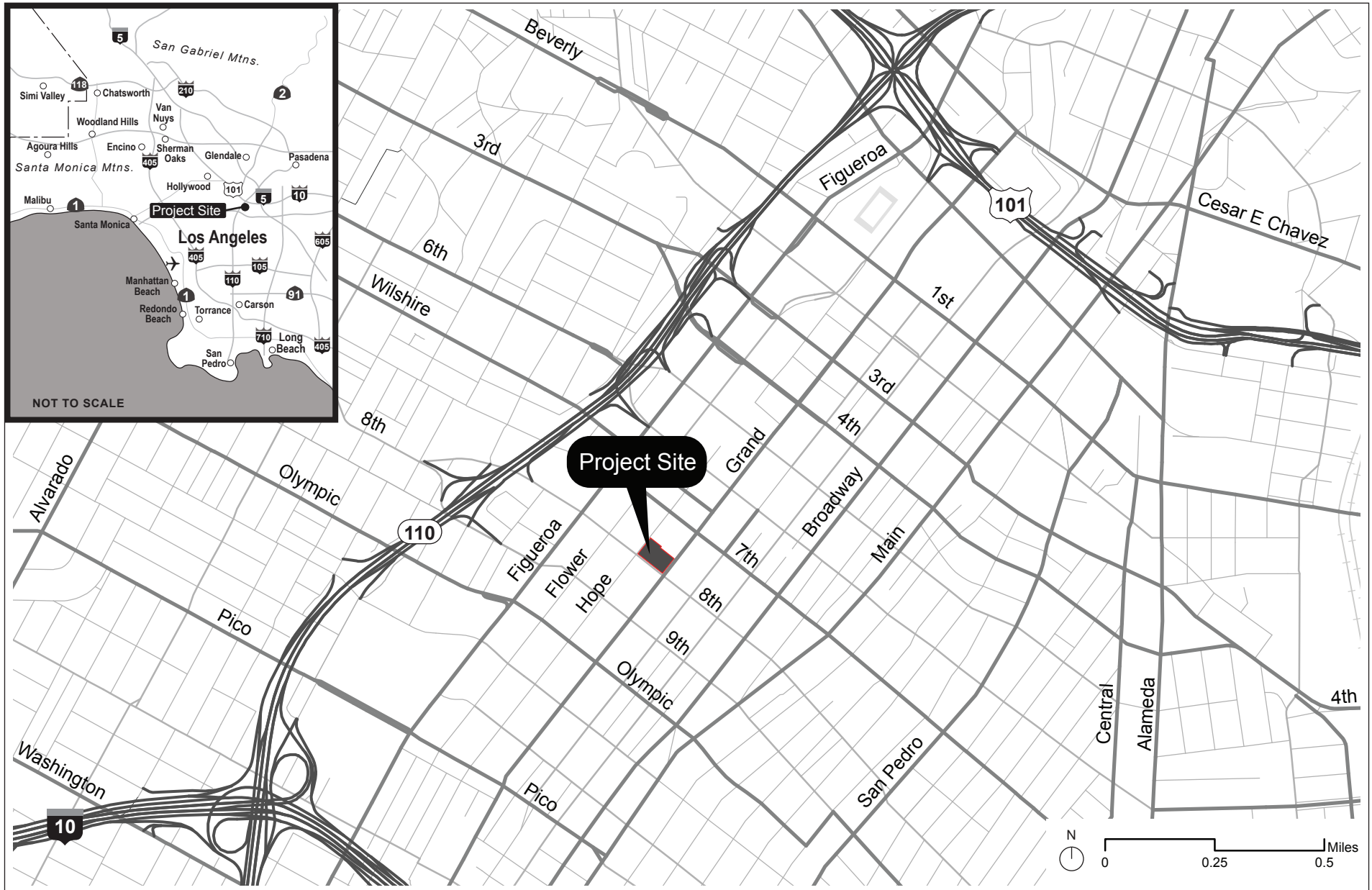


Figure A-1
Project Location Map

Source: LA County GIS; Eyestone Environmental, 2017.

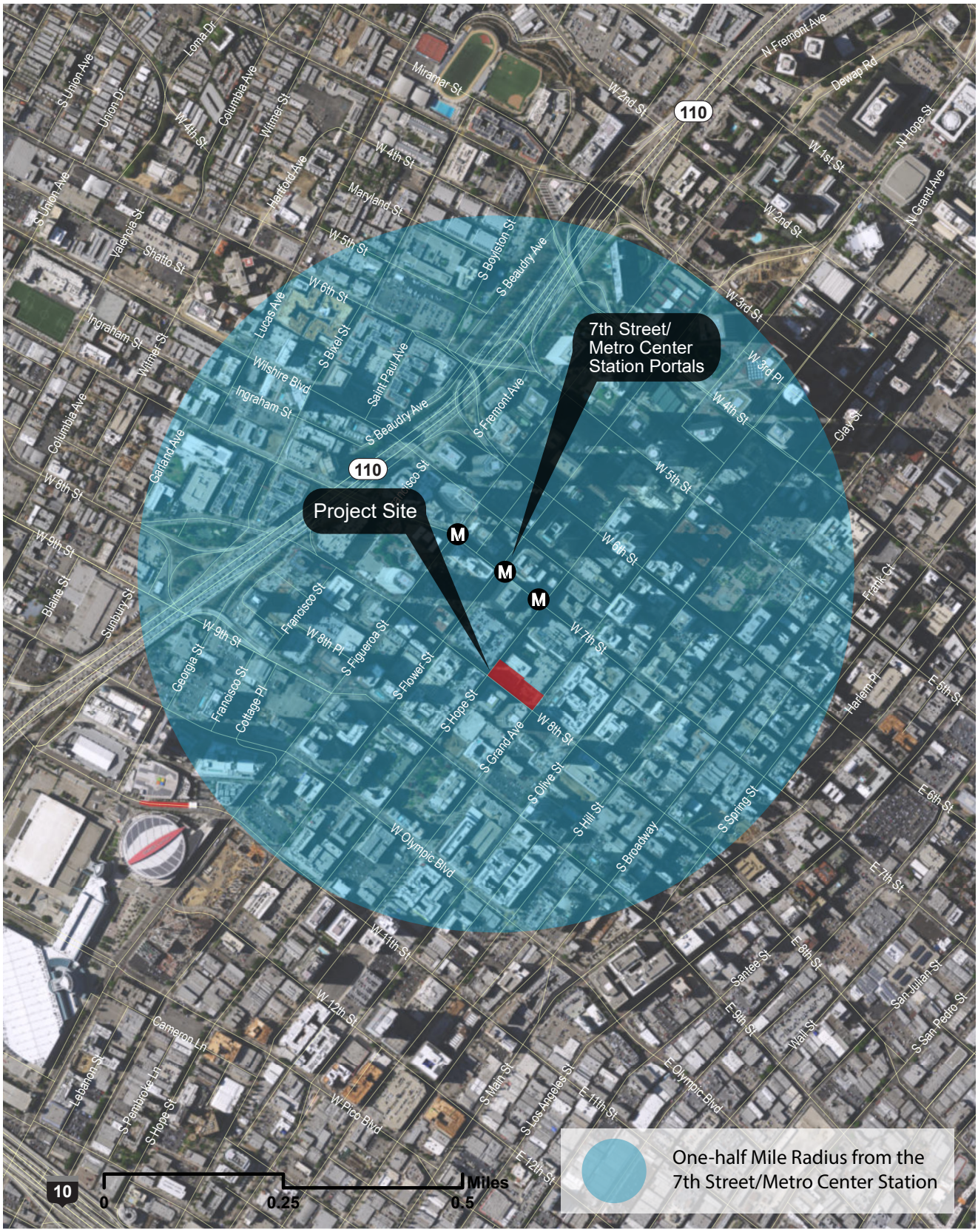


Figure A-2
Location of Project Site within a Transit Priority Area

Source: Eyestone Environmental, 2017.

2. Existing Uses

a. Existing Conditions

The Project Site is currently developed with a low-rise parking structure and a surface parking lot that is entirely paved and devoid of landscaping. The existing parking structure and surface parking lot currently provide 324 parking spaces, which are used for commercial parking by businesses in the area. A chain-link fence lines two sides of the parking lot along 8th Street and Grand Avenue. One tree is situated along Hope Street, and six trees line the sidewalk along 8th Street.

b. Land Use and Zoning

The Project Site is located within the planning boundary of the Central City Community Plan (Community Plan) area. Under the Community Plan, which was last updated in January 2003, the Project Site has a General Plan land use designation of Regional Center Commercial.

The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4). The Commercial zones permit a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. Height District No. 4 within the C2 zone does not impose any height limit with an allowable maximum Floor Area Ratio (FAR) of 13:1.

However, while Height District No. 4 permits an FAR of 13:1, the maximum permitted floor area of the Project Site is restricted by the “D” limitation, which restricts the FAR to 6:1 without a transfer of floor area rights (TFAR), pursuant to Ordinance 164,307. An FAR of 6:1 permits a total floor area of approximately 208,164 square feet. In the vicinity of the Project Site, there are numerous similarly zoned sites (subject to the same “D” limitation) developed with commercial tower buildings, including the Ernst & Young Building, the 777 Tower, the 801 Tower, 8th+Hope Tower, 801 S. Grand Building, and the Wilshire Grand Center.

3. Surrounding Land Uses

As shown in Figure A-3, Aerial Photograph of the Project Vicinity, on page A-5, the Project Site is located in a highly urbanized area dominated by commercial development and high density residential development. Surrounding uses in the vicinity of the Project Site are similarly zoned and developed with commercial, retail, restaurant, and parking uses. Immediately to the north of the Project Site are two parking structures—an 8-story structure along Hope Street and a 5-level structure along Grand Avenue. Across Hope Street to the west of the Project Site is a recently-renovated business/commercial development (i.e., The Bloc), consisting of a department store, a hotel, gym, retail and restaurant uses, and an office tower. To the east of the Project Site is a mixed-use development (i.e., Eighth & Grand), consisting of a mid-rise residential complex with a ground floor market. To the south of the Project Site are multiple office/commercial buildings and

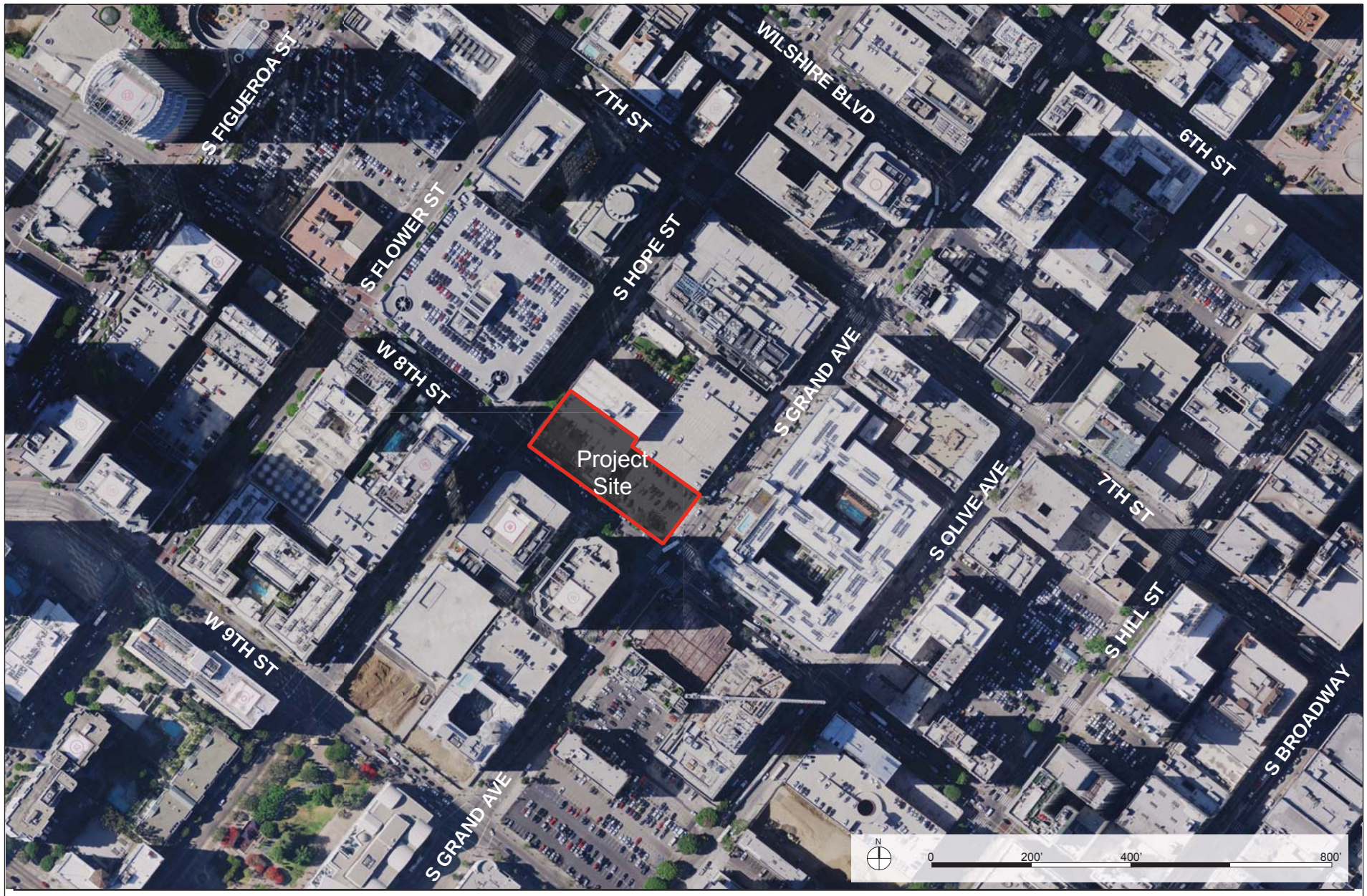


Figure A-3
Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2016; Eyestone Environmental, 2017.

other residential developments, including a high-rise residential tower (i.e., 8th+Hope) immediately to the southwest, two mixed-use high-rise buildings at 801 S. Grand Avenue and 888 S. Hope Street, and three other high-rise residential towers (i.e., Atelier, 845 S. Olive Street Tower, and 820 S. Olive Street Tower) to the southeast on Olive Street between 8th Street and 9th Street. In the Project vicinity, beyond these land uses are other high-rise commercial buildings and skyscrapers that are commercial, business, and residential in nature.

B. Description of the Project

1. Project Overview

The Project proposes to develop a mixed-use project, consisting of 409 residential units and approximately 7,329 square feet of ground level commercial/retail/restaurant uses on a 34,694-square-foot site (0.83 gross acre or 0.80 net acre) located in Downtown Los Angeles. As presented in Table A-1 on page A-7, the Project would provide up to 409 residential units and approximately 7,329 square feet of ground level commercial/retail/restaurant uses.

To accommodate the Project, the existing parking structure and surface parking lot would be removed. The Project would include 494 parking spaces that would be distributed throughout the Project Site on six levels, three below-grade (i.e., Levels B1 through B3) and three above-grade (i.e., Levels 2 through 4), that would utilize a mechanical lift system that is operated by an attendant. The Project would provide a total of approximately 453 vehicle parking spaces for the residential uses, as well as 34 spaces for buildings located at 517 West 7th Street and 611 West 6th Street.[1] As the Project's commercial square footage is less than 7,500 square feet, no parking would be required.[2] However, the Project would be providing 7 parking spaces for commercial uses. The Project would also provide 462 bicycle parking spaces.

As shown in Figure A-4 through Figure A-21 on pages A-8 through A-25, the Project would involve development of a 39-story high-rise mixed-use building with three subterranean levels. The maximum depth of the subterranean levels would be approximately 50 feet below ground level, and the maximum height of the building would be approximately 499 feet above ground level.

The ground level (Level 1) of the Project would consist of commercial/retail/restaurant uses along Hope Street and 8th Street. Level 5 would include the main outdoor and indoor common open space overlooking Hope Street and 8th Street, and Level 6 would include additional indoor common space. Residential units and private balcony space would be located on Levels 7 through 38 in the residential tower. Level 38 would also feature a deck with additional indoor and outdoor open space. Level 39 would house the building's mechanical equipment.

---

[1] *Pursuant to covenanted and recorded parking agreements PKG-4743, PKD-5621, and PKG-5248.*

[2] *Pursuant to LAMC Section 12.21-A,4(l) as related to the exceptions to commercial regulations for developments in the Downtown Business District.*

Table A-1
Summary of Proposed Floor Area[a]

Land Use	Floor Area
Residential	395,987 square feet (409 dwelling units)
Commercial/Retail	7,329 square feet
Project Total	**403,316 square feet**
Lot Area	**34,694 square feet**

[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

Source: Eyestone Environmental, 2017.

The Applicant is requesting approval of a TFAR of 195,152 square feet to the Project Site (Receiver Site) from a Donor Site, which, in this case, is the City-owned Los Angeles Convention Center at 1201 South Figueroa Street. Approval of the TFAR request would increase the total floor area of the Project to 403,316 square feet and increase the Project Site FAR from 6:1 to 11.63:1 (higher than the base FAR but less than the 13:1 FAR allowed in Height District No. 4).

2. Building Design

The Project would be designed in a contemporary architectural style. Building materials that are proposed to be used include different types of glass, concrete, aluminum, and stone. These varied surface materials would provide articulated features and high quality design elements with window treatments, architectural design features, and building articulations to enhance the pedestrian space. The 39-story high-rise mixed-use building would be designed using vision and spandrel glass for the majority of the residential tower, with pre-finished aluminum and perforated metal panels for the podium. The Project is designed to be consistent with the City's *Downtown Design Guide: Urban Design Standards and Guidelines* (Downtown Design Guide) and would enhance the urban appeal and walkability of the Project vicinity and neighborhood. Specifically, as shown in Figure A-18 through Figure A-21 on pages A-22 through A-25, the façade of the building would be articulated along all street frontages and ground-level retail spaces on both Hope Street and 8th Street, as the proposed ground floor commercial/retail/restaurant uses are intended to promote pedestrian activity. Furthermore, the Project would provide a row of street trees along 8th Street, Hope Street, and Grand Avenue, that would improve pedestrian travel throughout the surrounding area.

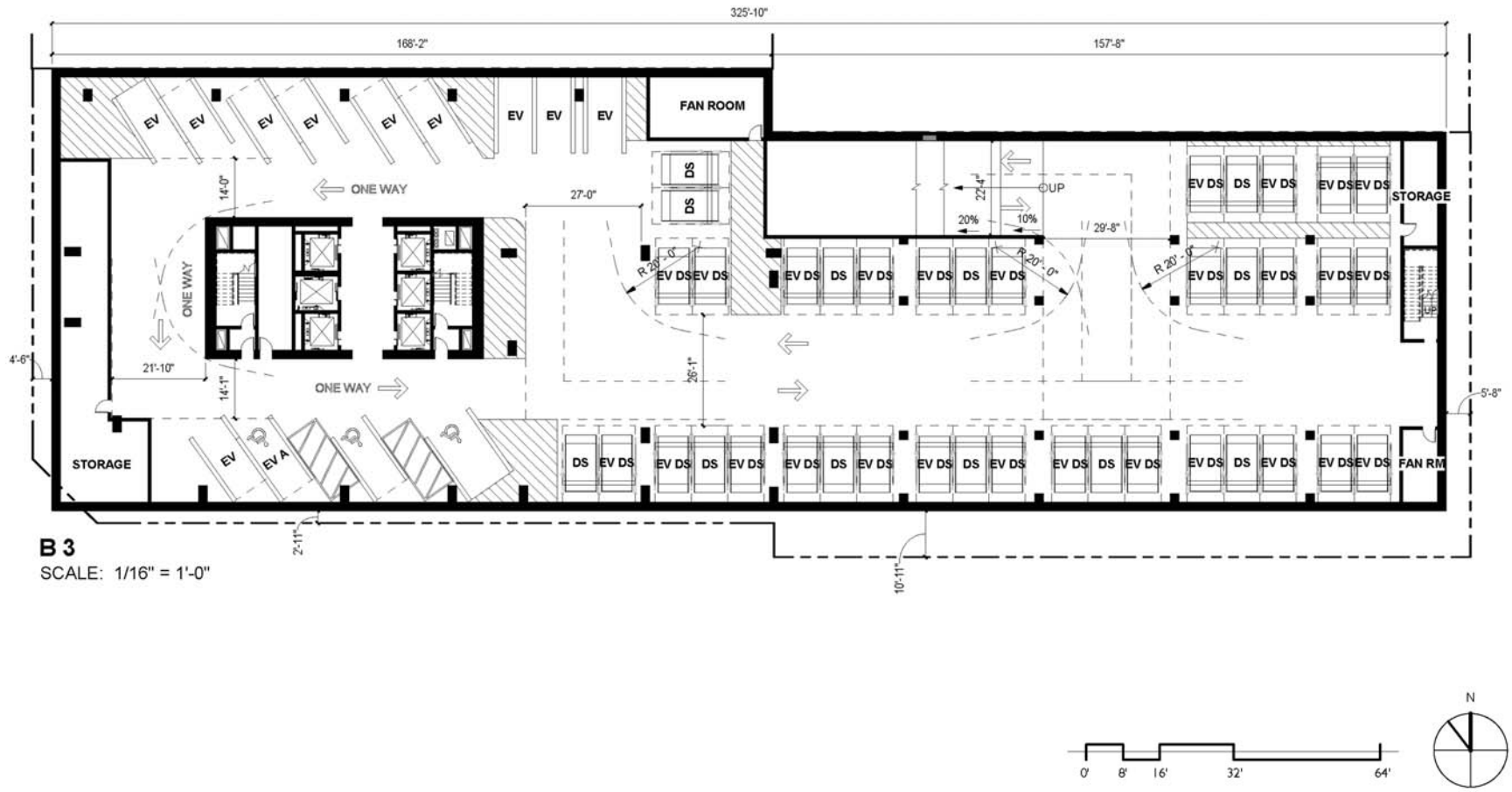


Figure A-4
Site Plan—Level B3

Source: Johnson Fain & Mitsui Fudosan, 2017.

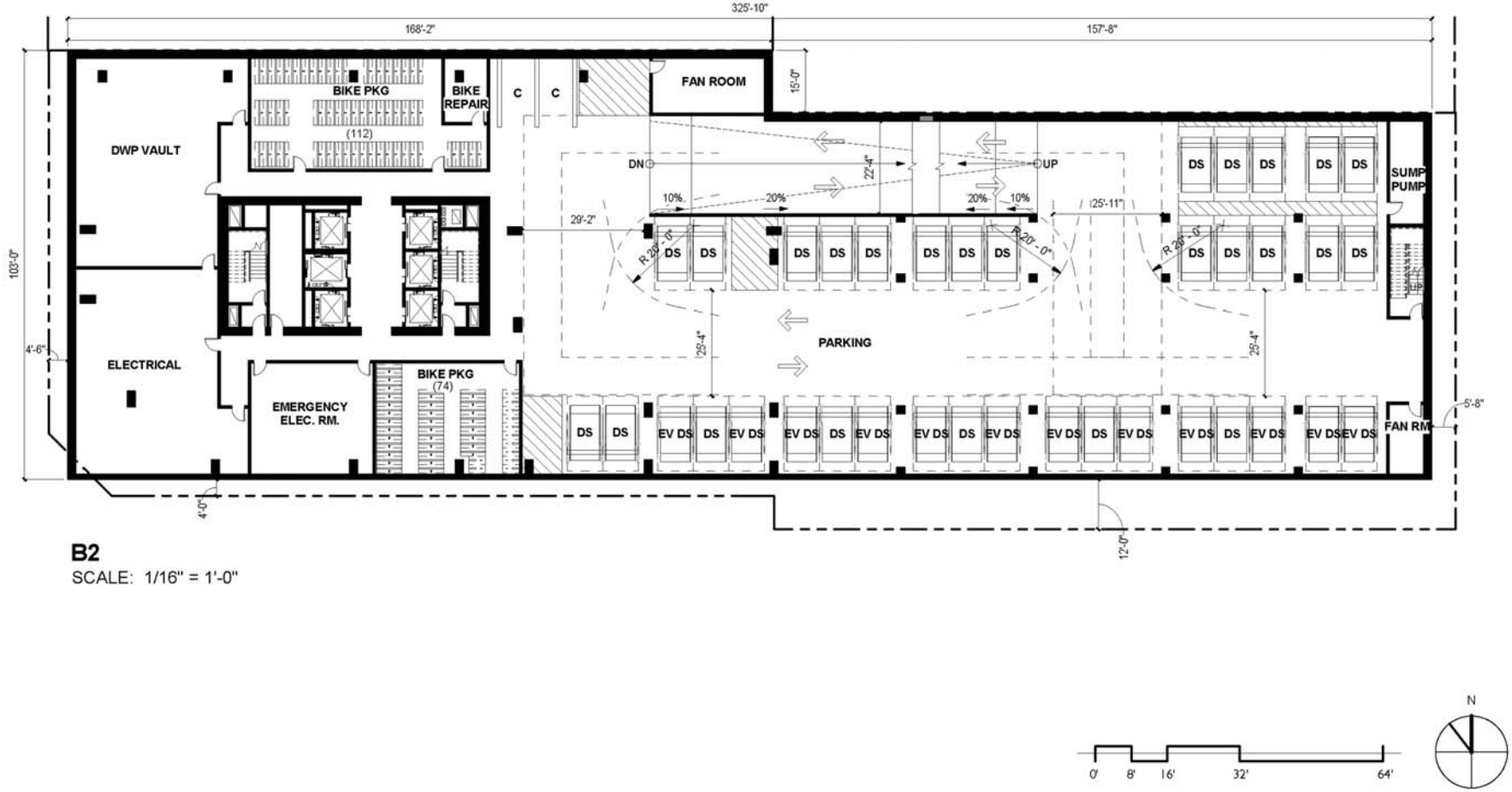


Figure A-5
Site Plan—Level B2

Source: Johnson Fain & Mitsui Fudosan, 2017.

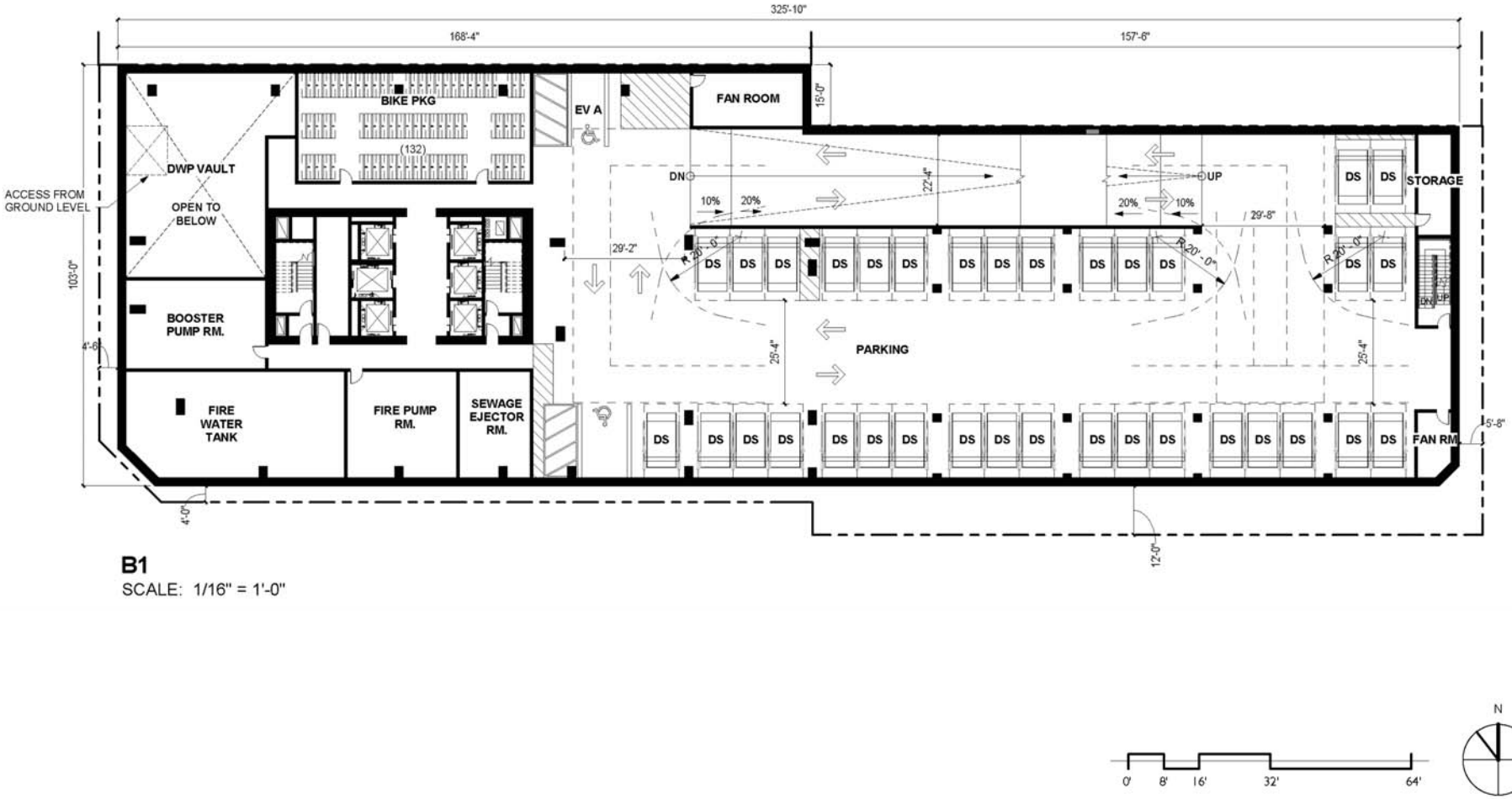


Figure A-6
Site Plan—Level B1

Source: Johnson Fain & Mitsui Fudosan, 2017.

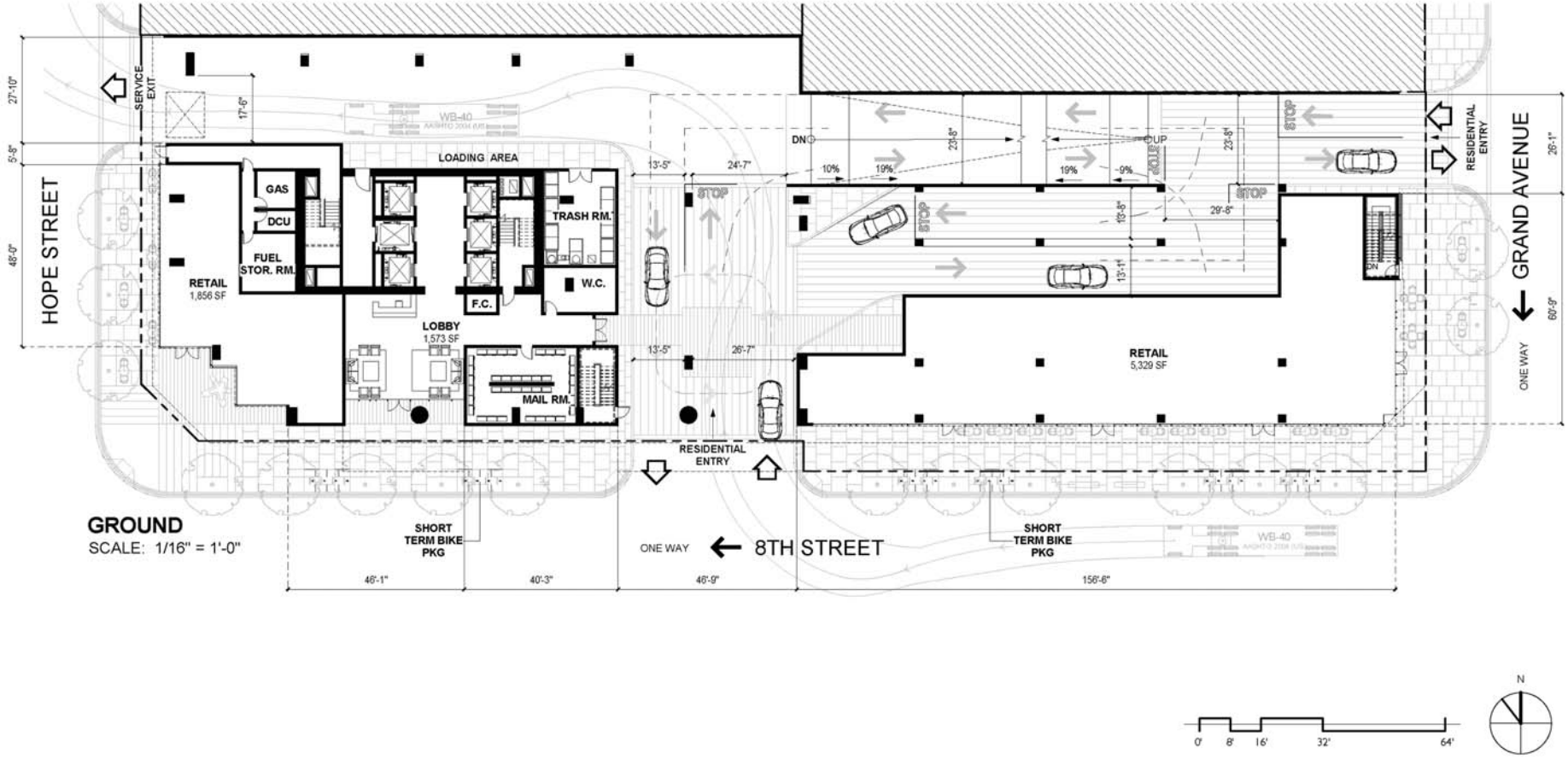
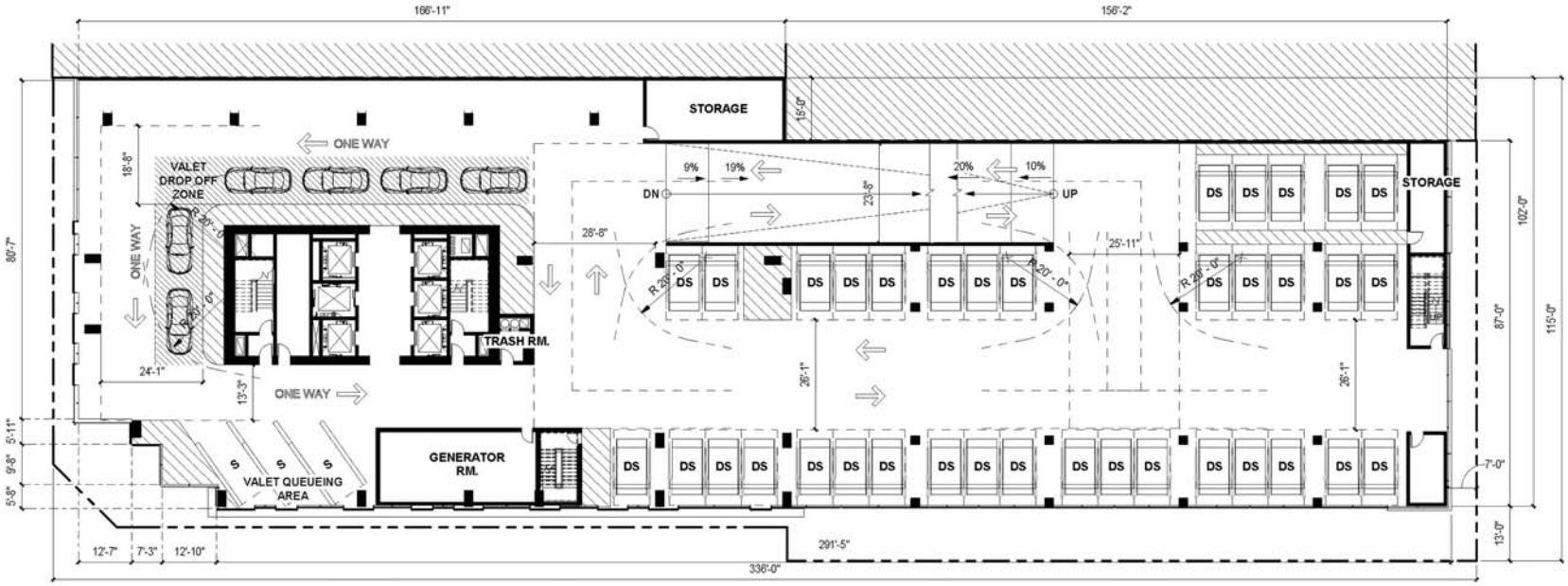


Figure A-7
Site Plan—Level 1

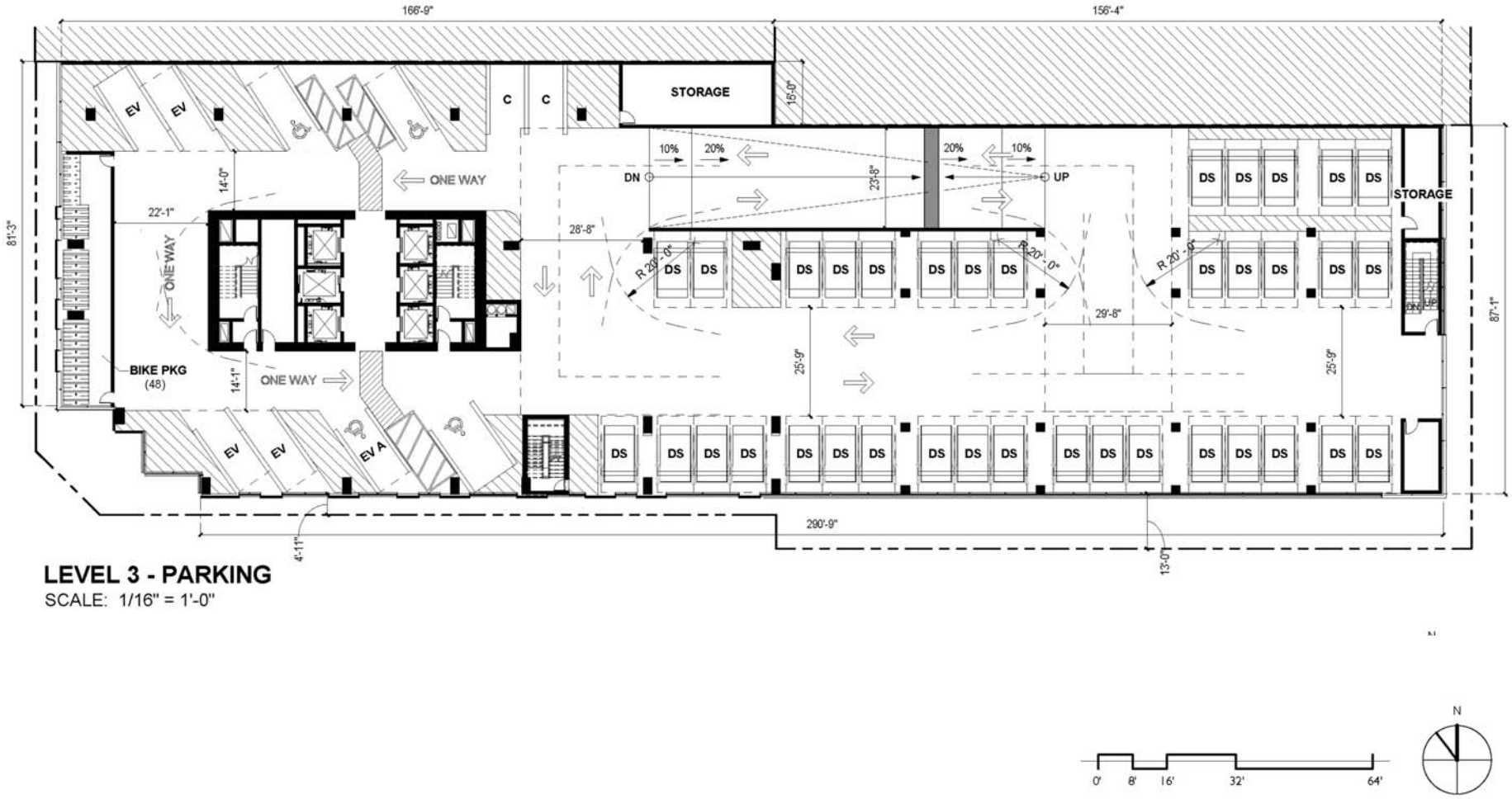
Source: Johnson Fain & Mitsui Fudosan, 2017.



LEVEL 2 - PARKING
SCALE: 1/16" = 1'-0"

Figure A-8
Site Plan—Level 2

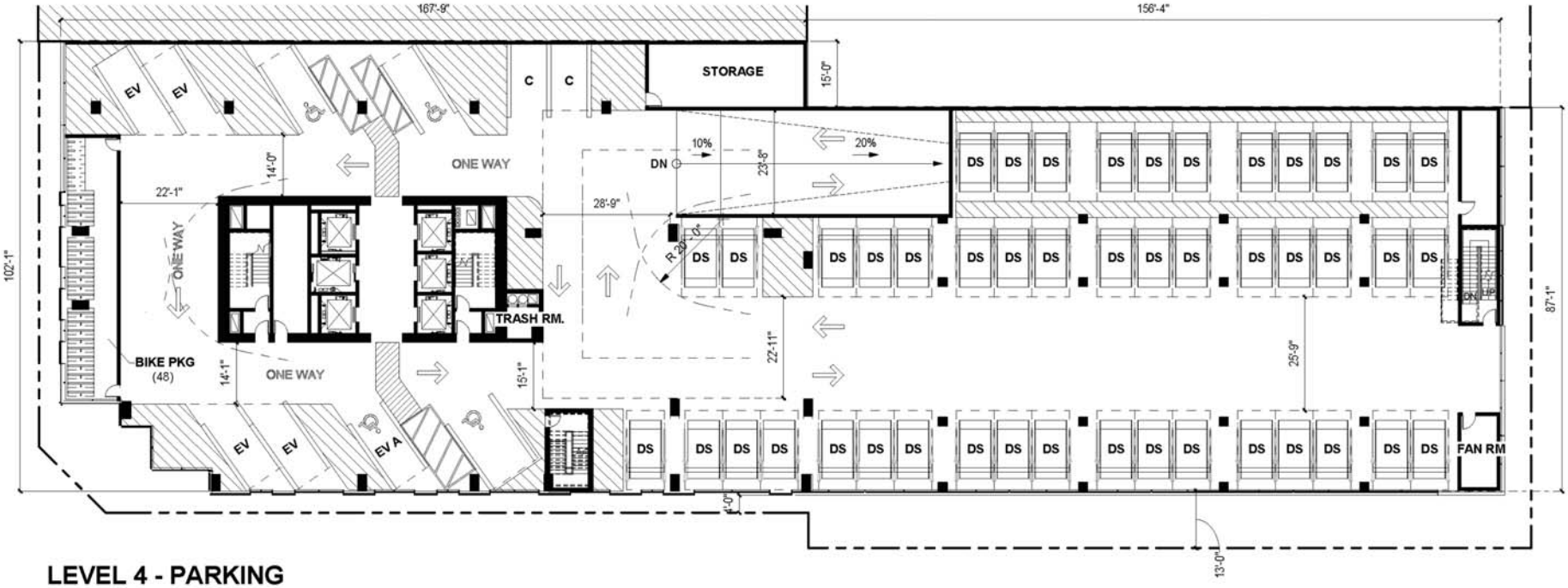
Source: Johnson Fain & Mitsui Fudosan, 2017.



LEVEL 3 - PARKING
SCALE: 1/16" = 1'-0"

Figure A-9
Site Plan—Level 3

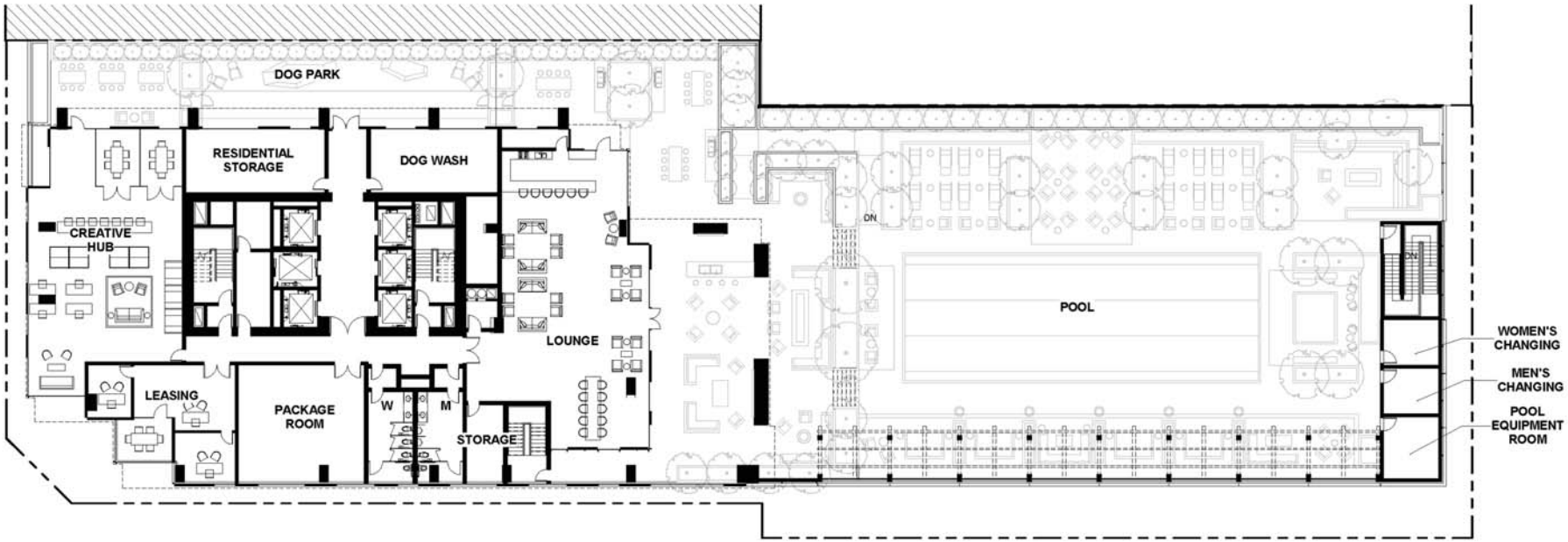
Source: Johnson Fain & Mitsui Fudosan, 2017.



LEVEL 4 - PARKING
SCALE: 1/16" = 1'-0"

Figure A-10
Site Plan—Level 4

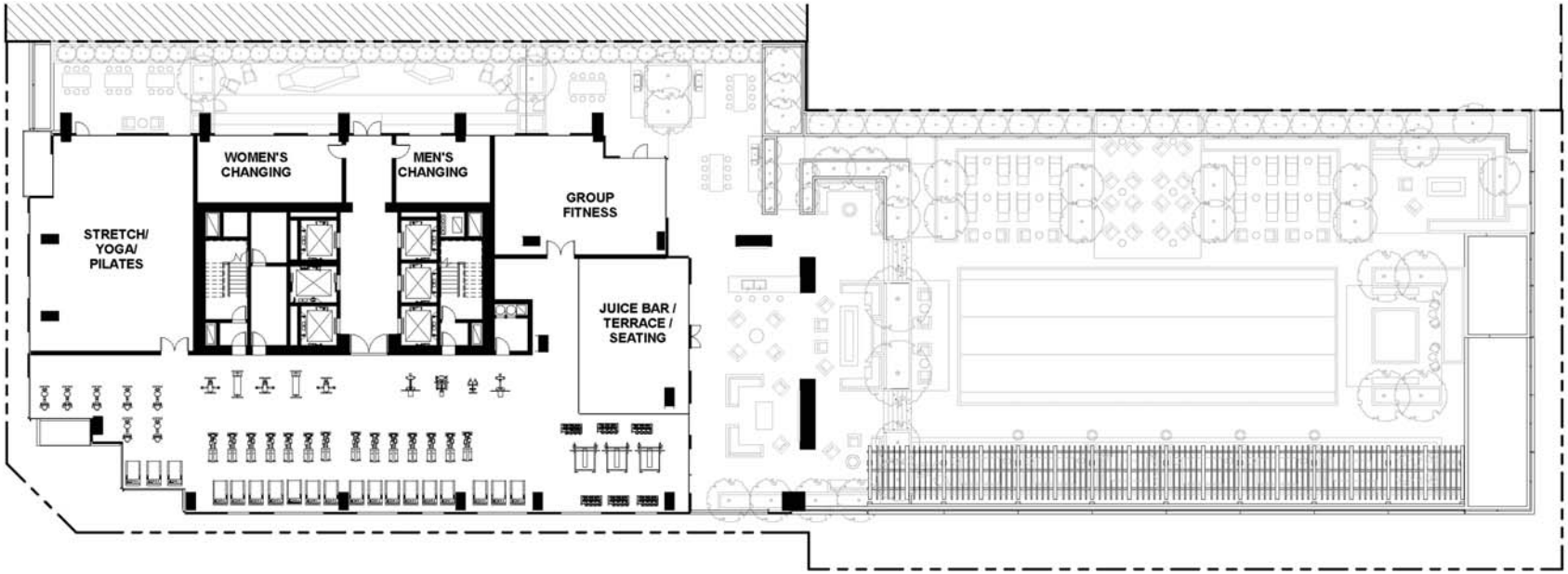
Source: Johnson Fain & Mitsui Fudosan, 2017.



LEVEL 5
SCALE: 1/16" = 1'-0"

Figure A-11
Site Plan—Level 5

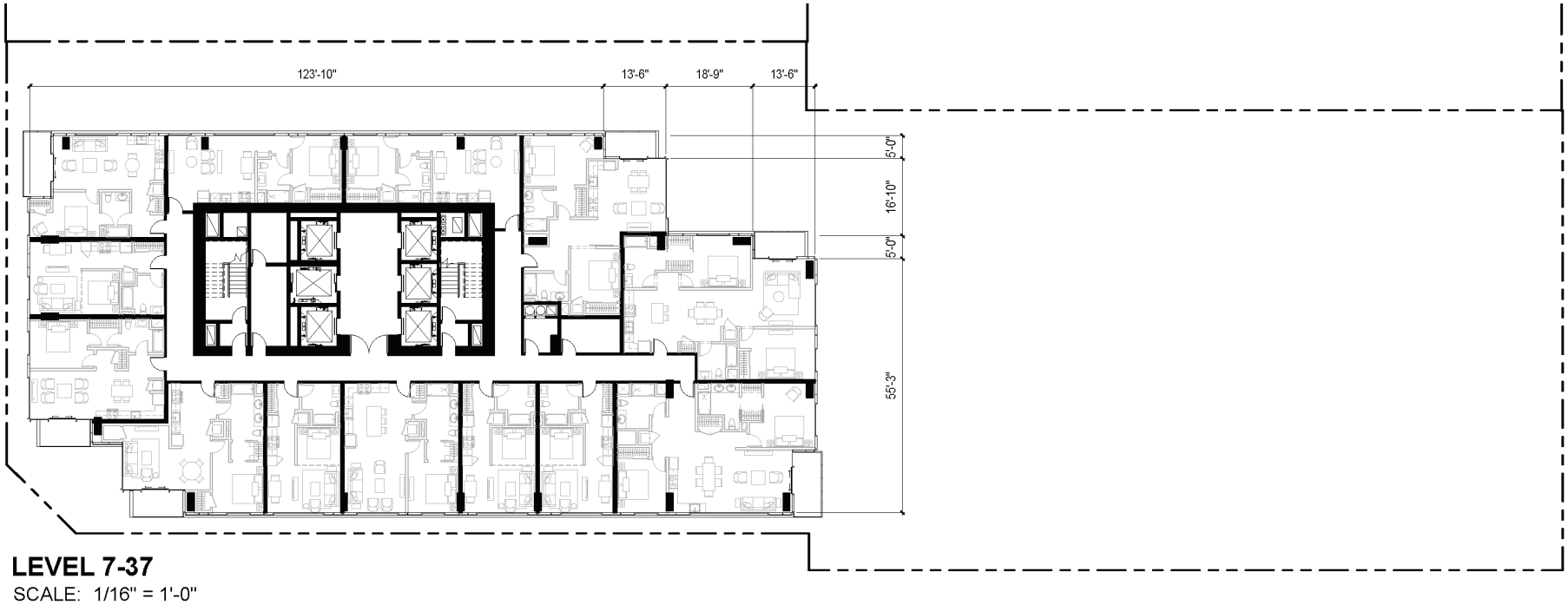
Source: Johnson Fain & Mitsui Fudosan, 2017.



LEVEL 6
SCALE: 1/16" = 1'-0"

Figure A-12
Site Plan—Level 6

Source: Johnson Fain & Mitsui Fudosan, 2017.



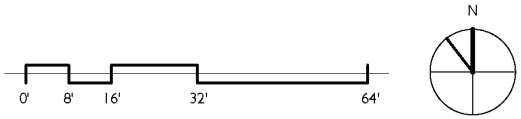
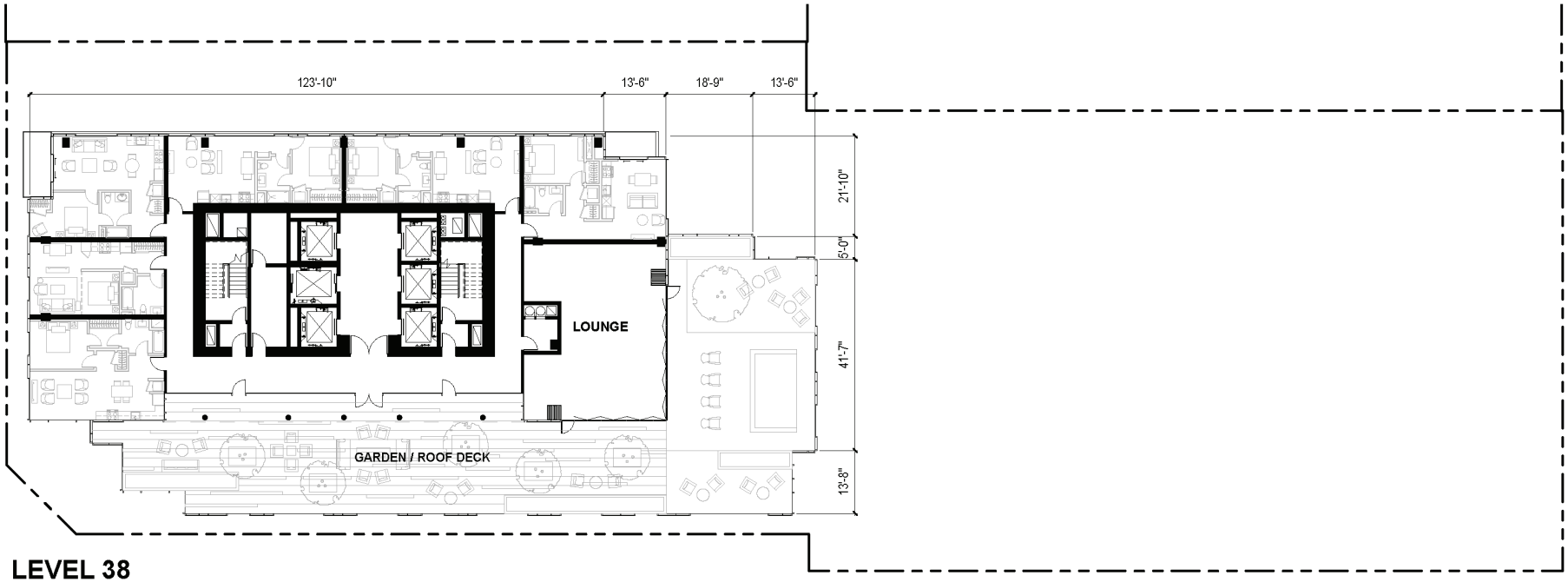


Figure A-13
Site Plan—Levels 7-37

Source: Johnson Fain & Mitsui Fudosan, 2017.



LEVEL 38
SCALE: 1/16" = 1'-0"

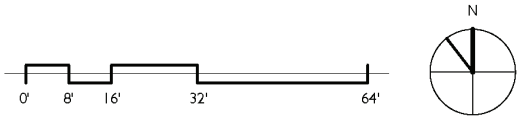
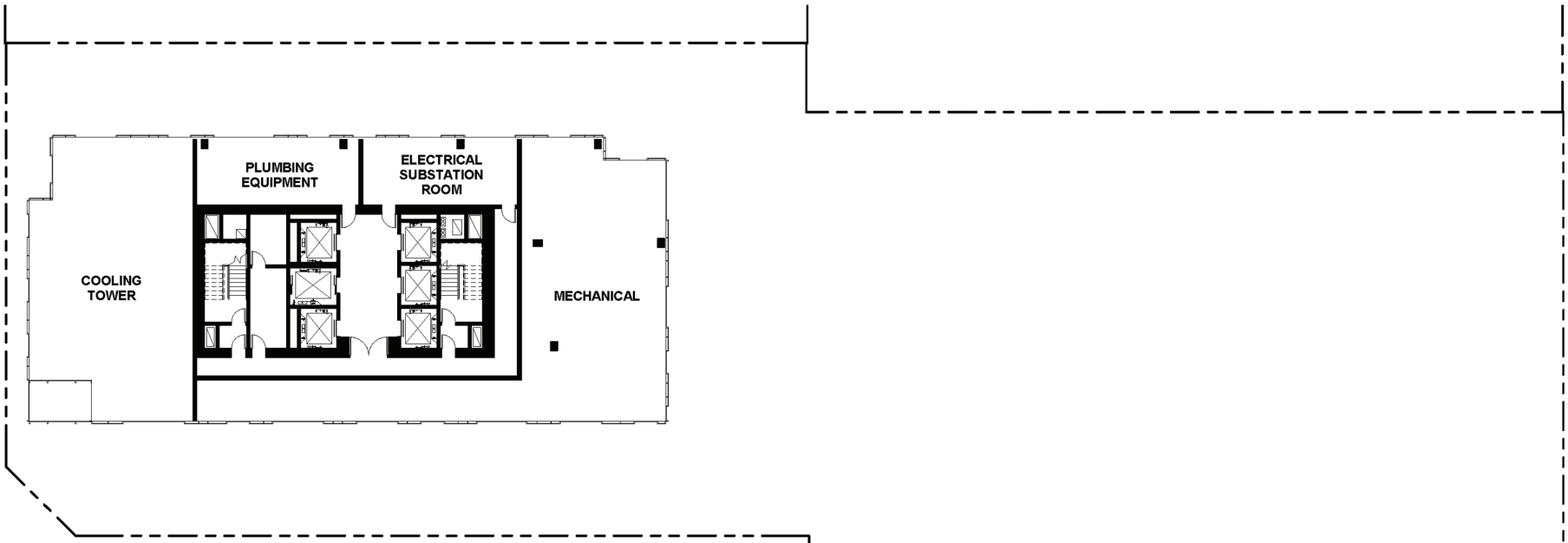


Figure A-14
Site Plan—Level 38

Source: Johnson Fain & Mitsui Fudosan, 2017.



LEVEL 39 (MECHANICAL)
SCALE: 1/16" = 1'-0"

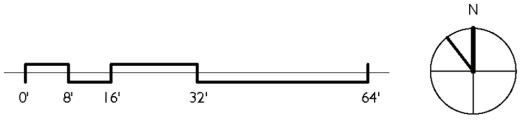


Figure A-15
Site Plan—Level 39 (Mechanical)

Source: Johnson Fain & Mitsui Fudosan, 2017.

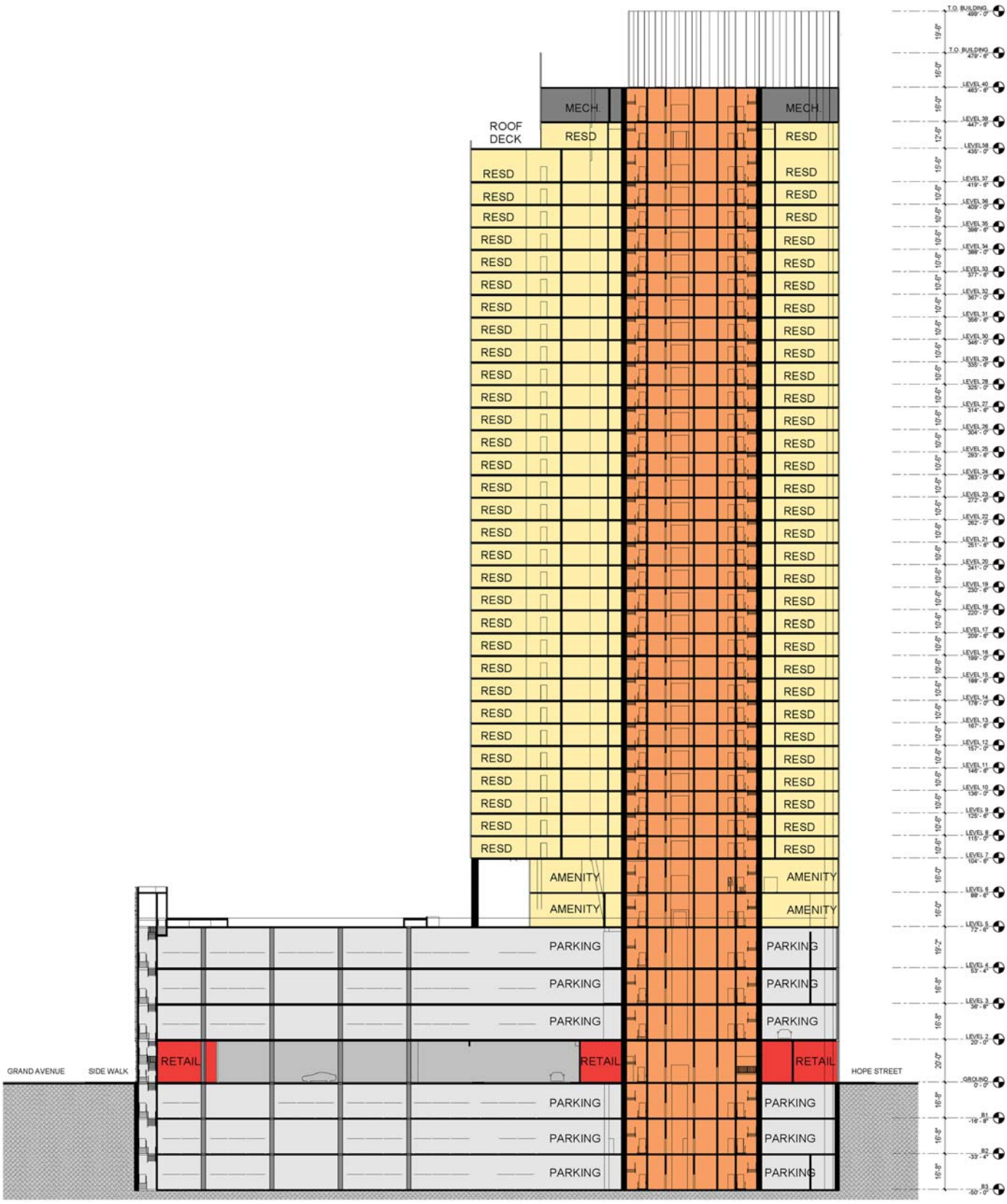


Figure A-16
Building Section

Source: Johnson Fain & Mitsui Fudosan, 2017.

Figure A-17
Conceptual Rendering

Source: Johnson Fain & Mitsui Fudosan, 2017.

MATERIAL KEY	
TYPE	**DESCRIPTION**
C-1	CONCRETE
GL-1	VISION GLASS 1
GL-2	VISION GLASS 2
GL-3	SPANDREL GLASS
MP-1	PERFORATED METAL PANELS
MP-2	METAL PANELS
MT-1	PREFINISHED ALUMINUM
MT-4	PREFINISHED ALUMINUM
ST-1	STONE 1

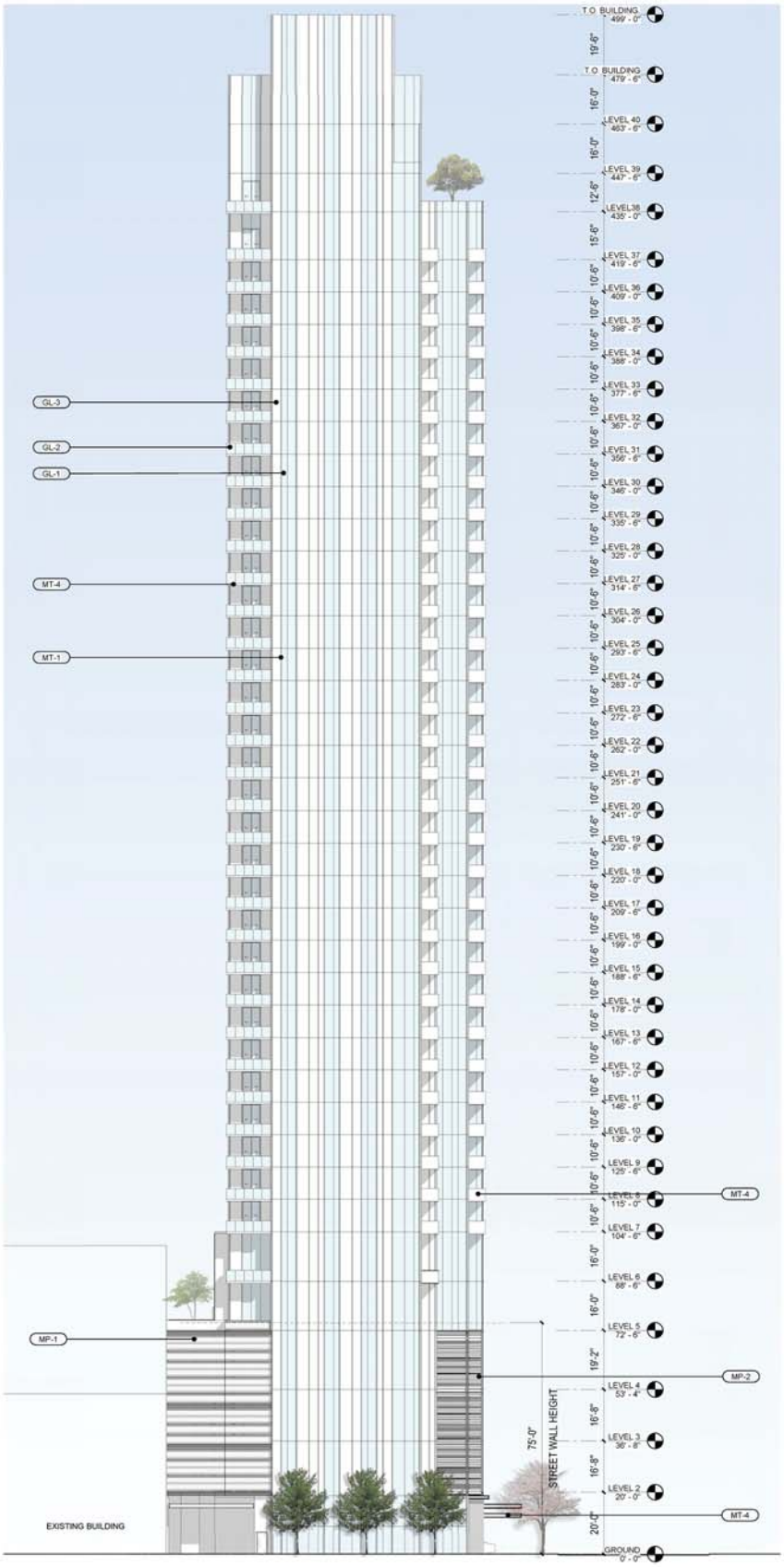
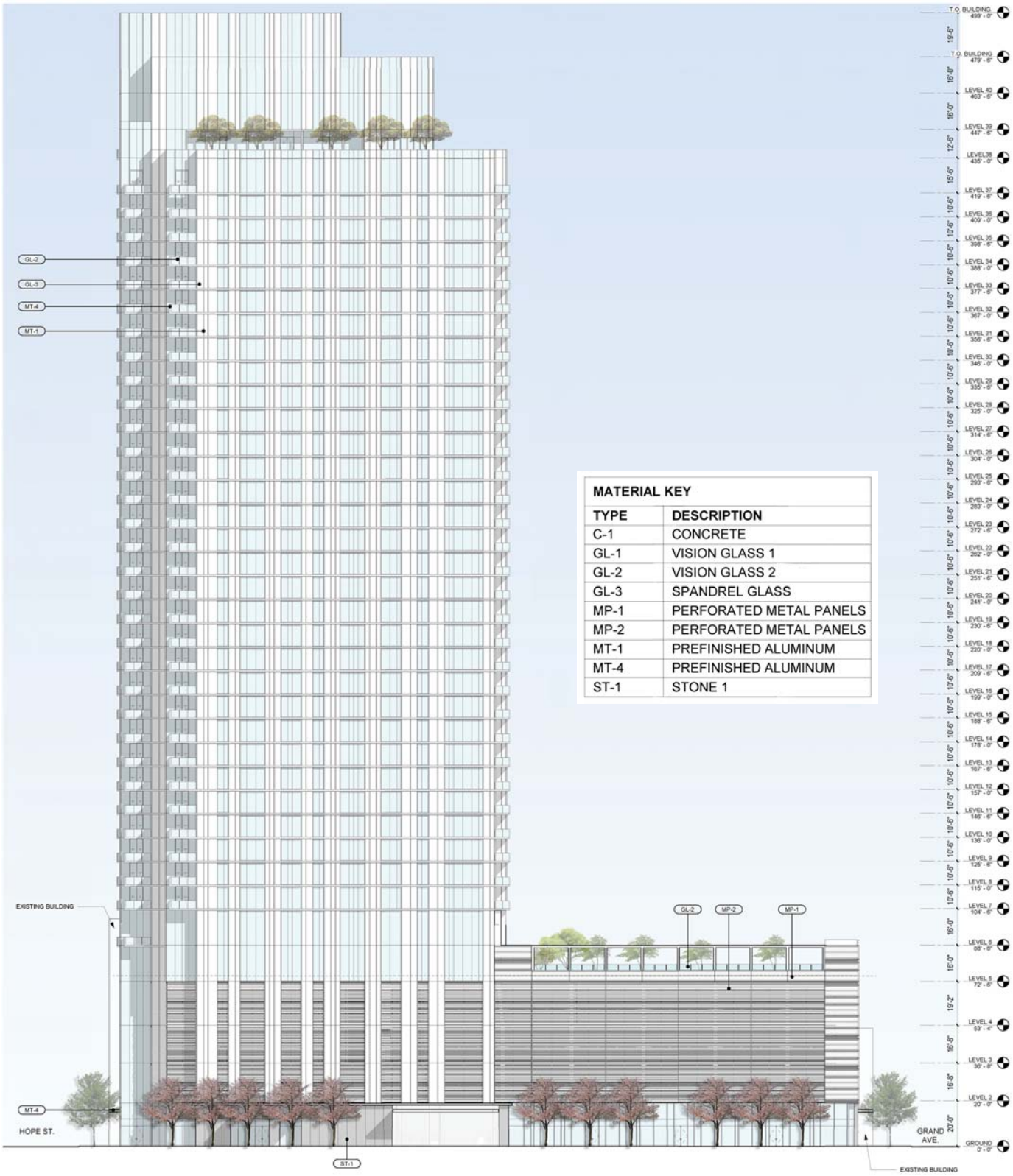


Figure A-18
West Elevation

Source: Johnson Fain & Mitsui Fudosan, 2017.



MATERIAL KEY

TYPE	DESCRIPTION
C-1	CONCRETE
GL-1	VISION GLASS 1
GL-2	VISION GLASS 2
GL-3	SPANDREL GLASS
MP-1	PERFORATED METAL PANELS
MP-2	PERFORATED METAL PANELS
MT-1	PREFINISHED ALUMINUM
MT-4	PREFINISHED ALUMINUM
ST-1	STONE 1

Figure A-19
South Elevation

Source: Johnson Fain & Mitsui Fudosan, 2017.

MATERIAL KEY	
TYPE	**DESCRIPTION**
C-1	CONCRETE
GL-1	VISION GLASS 1
GL-2	VISION GLASS 2
GL-3	SPANDREL GLASS
MP-1	PERFORATED METAL PANELS
MP-2	PERFORATED METAL PANELS
MT-1	PREFINISHED ALUMINUM
MT-4	PREFINISHED ALUMINUM
ST-1	STONE 1

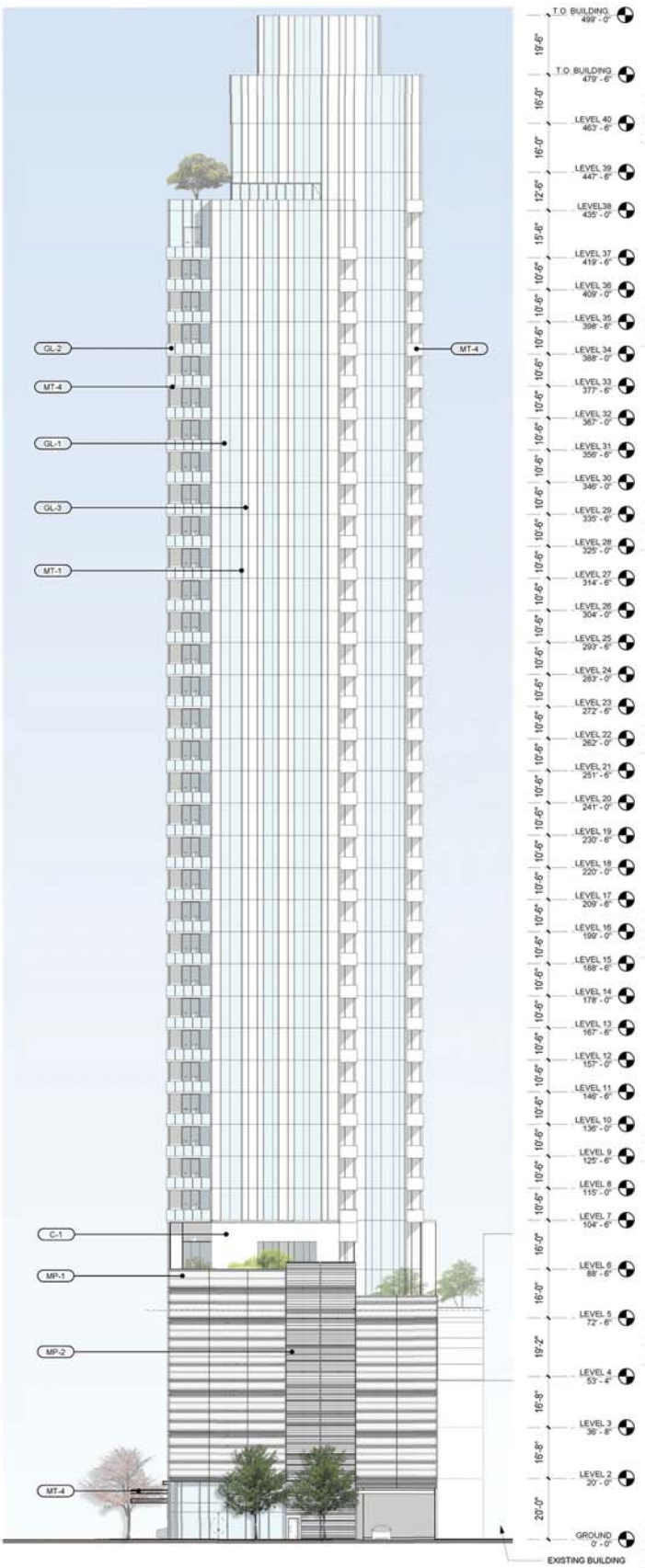


Figure A-20
East Elevation

Source: Johnson Fain & Mitsui Fudosan, 2017.

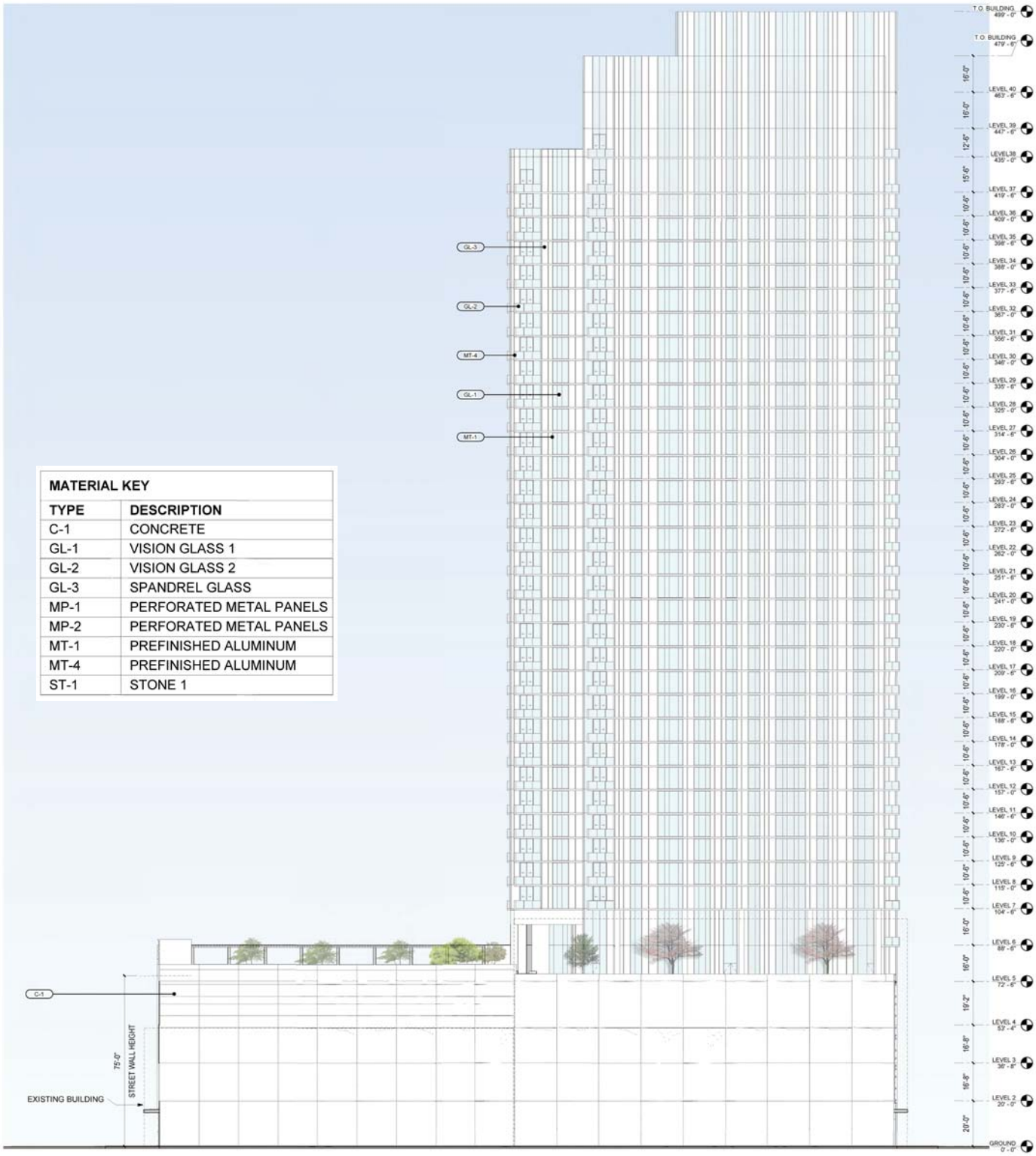


Figure A-21
North Elevation

Source: Johnson Fain & Mitsui Fudosan, 2017.

3. Open Space and Recreational Amenities

The Project would include a number of open space areas and recreational amenities, totaling approximately 43,776 square feet[3] spread over four levels; the landscaping plans for the outdoor amenities are shown in Figure A-22 on page A-27. The open space and recreational amenities provided by the Project would meet the required area (43,225 square feet) as set forth by the LAMC. As shown in Figure A-7 on page A-11, Level 1 would have 3,223 square feet of outdoor open space, consisting of landscaped areas fronting 8th Street, Hope Street, and Grand Avenue. As shown in Figure A-11 on page A-15, Level 5, which is the podium level, would comprise 24,869 square feet of common open space, including a pool with lounge gardens, a spa, a barbeque/dining area, outdoor lounge/bar area, an indoor lounge, a dog park, and a creative space area. As shown in Figure A-12 on page A-16, Level 6 would provide 8,931 square feet of indoor amenities, including a fitness studio/gym and juice bar. As shown in Figure A-14 on page A-18, Level 38 would provide a 4,205-square-foot outdoor landscaped deck with seating clusters and an additional 1,145 square feet of indoor lounge and 479 square feet of an outdoor covered area that is part of the roof deck. A total of approximately 9,400 square feet of private balcony space for some of the residential units would be provided.

As part of the Project along the street frontage, a row of street trees would each be planted on Hope Street, 8th Street, and Grand Avenue. These trees would include, but would not be limited to, London plane trees, pink trumpet trees, and southern magnolia trees. A variety of trees, including, but not limited to, citrus, desert willow, and mimosa silk trees, as well as shrubs and ground cover, would also be planted on Levels 5 and 38. Overall, approximately 56 new trees and 62 shrubs would be provided by the Project.

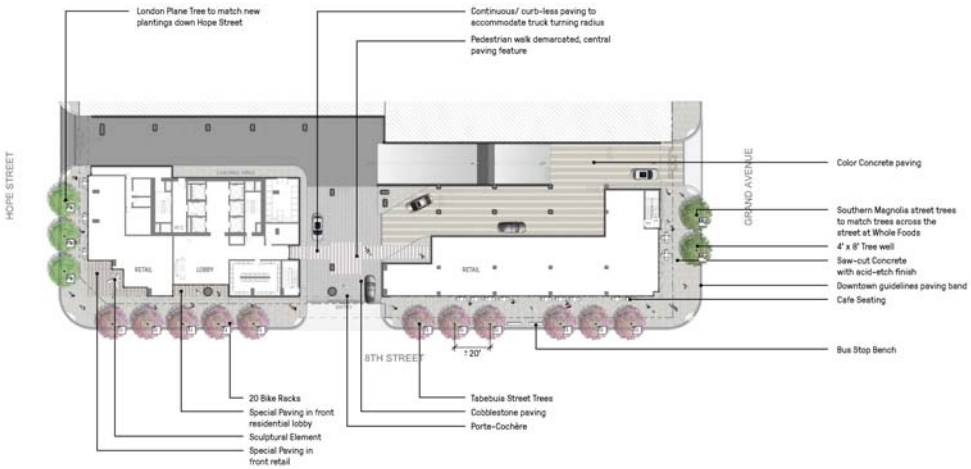
4. Signage and Lighting

Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Proposed signage would include mounted Project identity signage, building and commercial tenant signage, general ground-level and wayfinding pedestrian signage, and security markings in compliance with code requirements. Project identity signage would be located at the podium level to be visible from vehicular and pedestrian traffic. It would be an identifier for the Project by using approved logo and brand standards. Commercial/retail/ restaurant signage would complement the building architecture. Wayfinding signs would be located at parking garage entrances, elevator lobby, vestibules, and residential corridors. Commercial signage is limited to on-site commercial usage. No off-premises billboard advertising is proposed as part of the Project. All proposed signage would be designed in conformance with the applicable requirements of the LAMC, sign ordinance, and the Downtown Design Guide.

---

[3] *Section 12.21G of the LAMC requires that common open space be open to the sky; however, enclosed recreation rooms of at least 600 square feet or greater may count as common open space but cannot qualify for more than 25 percent of the total required usable open space. Therefore, due to this limitation in the maximum area of indoor amenities that may be counted towards meeting the common open space requirement, this total (43,776 square feet) is smaller than the amount of open space areas and recreational amenities that the Project would provide.*

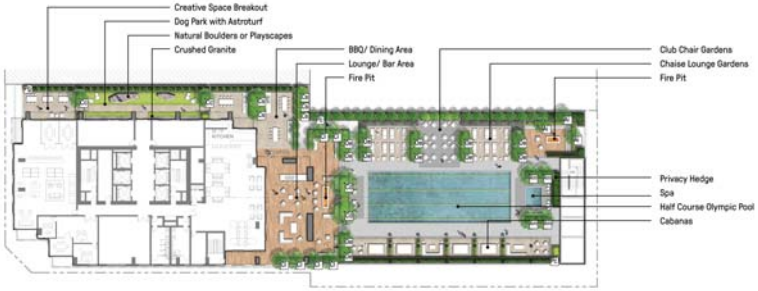
LEVEL 1



TOTAL OPEN SPACE: 3223 FT^2
TOTAL PLANTED AREA: 512 FT^2

Ground Level	Botanical name	Common name	Quantity	Size	Notes
Trees					
	Platanus acerifolia 'Columbia'	London Plane Tree	3	48" box	On Hope
	Magnolia grandiflora	Southern Magnolia	2	48" box	On Grand
	Tabebuia impetiginosa	Pink Trumpet Tree	11	48" box	On 8th
	Total Ground Level Tree Count		16		

LEVEL 5



TOTAL OPEN SPACE: 16142 FT^2
TOTAL PLANTED AREA: 4743 FT^2

Podium	Botanical name	Common name	Quantity	Size	Notes
Trees					
	Cercis canadensis	Eastern Redbud	2	36" box	
	Citrus species	Citrus Trees	5	48" box	
	Olea europaea	Swan Hill	12	48" box	
	Acacia baphylla	Willow Wattle	3	36" box	
	Arbutus Marina	Marina Strawberry Tree	4	12" box	
	Chilopsis linearis	Desert Willow	6	36" box	
	Cercidium x 'Desert Museum'	Palo Verde	2	12" box	
Shrubs & Ground Cover				5 gallon	
	prunus caroliniana	Carolina cherry laurel	22	15 gallon	
	Podocarpus gracilior	Fern Podocarpus	40	15 gallon	
	Dianella tasmanica 'Silver Streak'	Dianella tasmanica 'Silver Streak'		1 gallon	
	Leucadendron 'Cloudbank Ginny'	Leucadendron		5 gallon	
	Liriope muscari	Big Blue Lily Turf		1 gallon	
	Michelia figo	Banana shrub		15 gallon	
	Pittosporum crassifolium 'Compactum'	Dwarf Karo		5 gallon	
	Rosa 'Iceberg'	White Shrub Rose		5 gallon	
	Lavandula angustifolia 'Hidcote'	English Lavender		5 gallon	
	Thymus serpyllum	Brackland Thyme		1 gallon	
	Total Podium Level Tree Count		96		

LEVEL 38

TOTAL OPEN SPACE: 4205 FT^2
TOTAL PLANTED AREA: 1018 FT^2

Roof Level	Botanical name	Common name	Quantity		Notes
Trees					
	Olea europaea	Swan Hill	5	48" box	
	Albizia julibrissin	Mimosa Silk Tree	1	24" box	
	Total Roof Level Tree Count		6		
Shrubs & Ground Cover					
	Thymus polytrichus britannicus	Creeping Thyme		1 gallon	
	Feijoa sellowiana	Pineapple Guava		5 gallon	
	Pelargonium graveolens 'Lady Plymouth'	Variegated Rose Geranium		5 gallon	
	Phlomis fruticosa 'Grande Verde'	Jerusalem Sage		5 gallon	

Figure A-22

Open Space and Landscaping Plan and Recreational Amenities

Source: Johnson Fain & Mitsui Fudosan, 2017.

Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting solutions that would minimize light trespass from the Project Site. Project lighting would follow the streetscape lighting standards as established by the Downtown Design Guide.

All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved 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.

5. Access, Circulation, and Public Transportation

Vehicular access to the Project Site would be provided from 8th Street and Grand Avenue. The Project would be fully valeted, and, as such, no self-parking would be allowed. The loading and trash collection areas would be accessed from 8th Street and exited to Hope Street. Pedestrian access to the ground level commercial/retail/restaurant uses would be provided from Hope Street, 8th Street, and Grand Avenue. Project residents would access their units from a residential lobby located on 8th Street.

The Project would also include street improvements to comply with the requirements of Mobility Plan 2035. Hope Street has a street designation of Avenue II, which requires a minimum right-of-way (ROW) width of 86 feet, a half ROW width of 43 feet, a roadway width of 56 feet with 15-foot-wide sidewalks, and a half roadway width of 28 feet. 8th Street has a street designation of Modified Avenue II, which requires a minimum ROW width of 85 feet, a half ROW width of 42.5 feet, a roadway width of 56 feet with 14.5-foot-wide sidewalks, and a half roadway width of 28 feet. Grand Avenue has a street designation of Modified Avenue II, which requires a minimum ROW width of 90 feet, a half ROW width of 45 feet, a roadway width of 56 feet with 17-foot-wide sidewalks, and a half roadway width of 28 feet. Currently, Hope Street has a half ROW width of 40 feet, a half roadway width of 28 feet, and a sidewalk width of 12 feet. 8th Street has a half ROW width of 35 feet, a half roadway width of 23 feet, and a sidewalk width of 12 feet. Grand Avenue has a half ROW of 45 feet wide, a half roadway width of 28 feet, and a sidewalk width of 17 feet.

Based on the existing ROW, the east side of Hope Street would require a 3-foot dedication to meet the 15-foot-width sidewalk standard, and the north side of 8th Street would require a 5-foot widening to meet the 28-foot half roadway standard and a 7.5-foot dedication to meet the 15-foot sidewalk standard. Grand Avenue would not require roadway widening or sidewalk dedication. The southwestern corner and the southeastern corner of the Project Site at the intersections of 8th Street and Hope Street and 8th Street and Grand Avenue, respectively, would require corner cuts of 15 feet by 15 feet.

There are multiple public transportation opportunities in the immediate vicinity of the Project Site. In particular, as shown in Figure A-2 on page A-3, the Metro 7th Street/Metro Center Station

is located approximately 550 feet north of the Project Site at the northwestern corner of Hope Street and 7th Street. This station is served by Metro's Red, Purple, Blue, and Expo rail lines, along with the Silver Line limited-stop bus route. Additionally, Metro, the Los Angeles Department of Transportation (LADOT), and other transit agencies, including the Santa Monica Big Blue Bus, Foothill Transit, Orange County Transportation Authority, Santa Clarita Transit, Torrance Transit, and Antelope Valley Transit Authority, operate numerous bus lines with stops located in proximity to the Project Site.

6. Parking

Parking for the proposed uses would be provided in accordance with the LAMC requirements. Table A-2 on page A-30 provides a summary of the proposed vehicle parking for the Project. The Project would include 494 vehicle parking spaces in total, of which 453 spaces would be designated for the residential units, 7 spaces would be designated for the commercial/retail/restaurant uses, and 34 spaces would be allotted to the 517 West 7th Street and 611 West 6th Street buildings (pursuant to the covenanted and recorded parking agreements PKG-4743, PKG-5621, PKG-5248). Parking for the Project would be provided in Levels B1 through B3 and Levels 2 through 4 in a mechanical lift system that is operated by an attendant. Of the 494 parking spaces provided by the Project, 100 spaces would be made capable of supporting future electric vehicle supply equipment (EVSE) or be equipped with EV charging stations; at a minimum, 5 percent of the total code-required parking spaces would be equipped with EV charging stations.

As previously discussed, the Project would utilize a valet system with no self-parking allowed. Project residents and visitors would access parking from Grand Avenue or 8th Street and proceed to the valet drop-off zone on Level 2. Adjacent to the valet drop-off zone would be the elevator lobby, which would serve as access to Level 1 amenities, retail area, and the residential tower levels above. Vehicles would be picked up in the same valet zone on Level 2.

Bicycle parking would be available for both residential and commercial/retail/restaurant uses. Table A-3 on page A-30 provides a summary of the proposed bicycle parking for the Project. As shown in the table, the Project would provide a total of 462 bicycle parking spaces. Of the 462 spaces, approximately 410 long-term and 44 short-term spaces would be provided for the residential uses, and approximately 4 long-term and 4 short-term spaces would be provided for the commercial/retail/restaurant uses. The 48 short-term bicycle spaces for both the residential and commercial/retail/restaurant uses would be provided on the ground level along 8th Street.

7. FAR and Setbacks

While Height District No. 4 permits an FAR of 13 times the buildable area of the lot (13:1 FAR), the maximum permitted floor area for the Project site is restricted by the "D" development limitation, which limits the FAR to 6 times the buildable area of the lot (6:1 FAR) without approval of a TFAR (per Ordinance 164,307). With a lot area of 34,694 square feet, an FAR of 6:1 permits a total floor area of approximately 208,164 square feet. However, pursuant to the Central City Community Plan, an FAR of up to 13:1 is allowed with the transfer of surplus floor area obtained

Table A-2
Summary of Proposed Vehicle Parking

Land Use	Number of Spaces Required[a]	Number of Spaces Proposed
Residential	433	453
Commercial	0	7
517 W. 7th St. and 611 W. 6th St. Buildings[b]	34	34
Total	467	494

[a] *Pursuant to LAMC Section 12.21-A,4(P).*

[b] *Pursuant to covenanted and recorded parking agreements PKG-4743, PKD-5651, and PKG-5248.*

Source: Johnson Fain & Mitsui Fudosan, 2017.

Table A-3
Summary of Proposed Bicycle Parking

Land Use	**Number of Spaces Required[a]**	**Number of Spaces Proposed**
Residential—Long Term	409	410
Residential—Short Term	41	44
Commercial—Long Term	4	4
Commercial—Short Term	4	4
Total	**458**	**462**

[a] *Per LAMC Section 12.21-A,16.*

Source: Johnson Fain & Mitsui Fudosan, 2017.

from a Donor Site. An increased FAR would allow the underutilized infill Project Site to accommodate the residential density and ground floor commercial/retail/restaurant space called for in the Central City Community Plan.

Pursuant to Ordinance No. 181,574 and LAMC Section 14.5.6-B, a TFAR allows the transfer of unused allowable floor area of a lot from a Donor Site to a Receiver Site for projects involving transfers of 50,000 square feet or greater. The Applicant is requesting approval of a TFAR of 195,152 square feet to the Project Site (Receiver Site) from a Donor Site, which, in this case, is the City-owned Los Angeles Convention Center at 1201 South Figueroa Street. Approval of the TFAR request would increase the total floor area of the Project to 403,316 square feet and increase the Project Site FAR from 6:1 to 11.63:1 (higher than the base FAR but less than the 13:1 FAR allowed in Height District No. 4). LAMC Section 14.5.9-C requires that a Public Benefit Payment be provided as part of an approved Transfer Plan and shall serve a public purpose.

Pursuant to the Greater Downtown Housing Incentive Area Ordinance, LAMC Section 12.22-C,3(A), no yard requirements apply to the Project Site, except as required by the Downtown Design Guide. The Downtown Design Guide encourages variations in setbacks along street frontages and dictates that at least 80 percent of the Project frontage on Grand Avenue and Hope Street, and at least 70 percent of the Project frontage on 8th Street, be lined with the building street wall at the back of the setback. The building street wall must also reach a height of 75 feet. The Project would comply with all applicable requirements set forth in the LAMC, Downtown Design Guide, and Downtown Street Standards.

8. Sustainability Features

The Project is being designed and would be constructed to incorporate environmentally sustainable design features. The sustainability features include energy-efficiency measures, a pedestrian- and bicycle-friendly site design, recycling infrastructure, enhanced indoor air quality and water conservation measures. By integrating sustainability features into the design and construction of the Project, the proposed mixed-use development would include project design features (PDFs) that reduce energy and water usage and waste generation, and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure.

The following sustainability features would be incorporated in the Project:

(a) Water Conservation

- High-efficiency toilets throughout, including ultra-low flow urinals in all non-residential restrooms as appropriate.
- Non-residential restroom faucets with a maximum flow rate of 0.5 gallon per minute and non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute. Restaurant kitchen faucets would have pre-rinse self-closing spray heads with a maximum flow rate of 1.6 gallons per minute.
- Metering faucets in non-residential restrooms (i.e., automatically sensor-based faucets that turn off when not in use).
- Residential bathroom faucets with a maximum flow rate of 1.0 gallon per minute and kitchen faucets with a maximum flow rate of 1.5 gallons per minute. No more than one showerhead per shower stall, with a flow rate no greater than 1.75 gallons per minute.
- High-efficiency Energy Star–rated clothes washers either within individual units (with water factor of 6.0 or less) and/or in common laundry rooms (commercial washers with water factor of 7.5 or less).
- Installation of high-efficiency Energy Star–rated dishwashers in all residential units, and within kitchen/food preparation areas, at minimum, per City ordinance requirements.

- Weather-based, “smart” irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/microspray/subsurface irrigation and moisture sensors where appropriate.

- Use of proper hydro-zoning, turf minimization, zoned irrigation, and use of native/drought-tolerant plant materials.

(b) Energy Conservation and Efficiency

- High-efficiency HVAC equipment consisting of either water source heat pumps or four (4) pipe fan coil units.

- Installation of Energy Star–labeled products and appliances where appropriate.

- Meeting or exceeding Title 24, Part 6, California Energy Code baseline standard requirements for energy efficiency, based on the 2016 Energy Efficiency Standards requirements. Examples of design methods and technologies that could be implemented may include, but not be limited to, high performance glazing on windows, appropriately-oriented shading devices, high-efficiency hot water heating system, and enhanced insulation to minimize solar and thermal gain.

- Application of energy-saving lighting technologies and components to reduce the Project’s electrical usage-profile. Examples of these components include occupancy-sensing controls (where applicable), use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies where appropriate, and exterior lighting controlled by photo sensor and/or time clocks to ensure safety and visibility while preventing unnecessary energy usage.

(c) Transportation

- Allocation of designated parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.

- Provision of electric vehicle charging station infrastructure in accordance with LAMC requirements (i.e., provide electric vehicle supply wiring equal to 20 percent of the total number of parking spaces).

(d) Air Quality

- Participation in fundamental refrigerant management to preclude the use of chlorofluorocarbons (CFCs) in HVAC systems.

- Use of adhesives, sealants, paints, finishes, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

(e) Solid Waste

- At least 70 percent of construction and demolition debris from Project construction would be diverted from landfills.

- Provide on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers.

- Use of locally sourced building materials and building materials with recycled content where applicable.

(f) Water Quality

- Installation of a LID compliant on-site stormwater treatment system, capable of treating the volume of stormwater runoff from a local 85th percentile storm event.

- Installation of pre-treatment stormwater infrastructure for the stormwater runoff tributary to the on-site stormwater treatment system prior to the use of infiltration as a stormwater best management practice (BMP).

- Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site and/or on the Structure.

(g) Noise Management

- All building outdoor mounted mechanical and electrical equipment for the Project would be designed to meet the noise requirements of LAMC, Chapter XI, Section 112.02. In addition, all outdoor loading dock and trash/recycling areas would be fully or partially enclosed such that the line-of-sight between these noise sources (loading dock service area) and any adjacent noise sensitive land use would be obstructed.

(h) Construction and Design Elements

- Contractors would reference Partnership for Advancing Technology in Housing (PATH) and other current references for state-of-the-art construction methods, materials, and mechanical equipment and utilize same methods where applicable.

- Development and implementation of a construction waste management plan to facilitate the recycling and reuse of building and construction materials to the maximum extent feasible, including the on-site recycling and reuse of concrete removed during demolition and salvaging of existing appliances and fixtures.

- Waste diversion accounting would be utilized.

i. CEQA Guidelines Appendix F

In accordance with CEQA Guidelines Appendix F: Energy Conservation, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the

CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the EIR.

C. Project Construction and Scheduling

Construction of the Project is anticipated to commence in the spring of 2019 with site clearance and removal of the existing four-level parking structure and surface parking lot, followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to be completed in the fall of 2021. The estimated depth of excavation for the subterranean parking and building foundations would be approximately 50 feet below grade. It is estimated that approximately 63,600 cubic yards would be exported and hauled from the Project Site during the excavation phase. As part of the Project, a Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route Program would be subject to LADOT review and approval.

D. Necessary Approvals

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

- Transfer of Floor Area Rights (TFAR) Application pursuant to LAMC Section 14.5.6 for the transfer of greater than 50,000 square feet of floor area from the City of Los Angeles–owned Los Angeles Convention Center to the Project Site;

- Site Plan Review pursuant to LAMC Section 16.05;

- Vesting Tentative Tract Map pursuant to LAMC Section 17.15 to create one ground lot comprising the entire site and six airspace lots, and to permit parking deviation from the number of parking spaces defined in the Advisory Agency Policy Memo AA-2000-1, which requires 2.25 parking spaces per dwelling unit, to 1 parking space per dwelling unit, inclusive of guest parking, in consideration of the Project's proximity to jobs and public transit;

- Construction approvals and permits, including building, grading, excavation, foundation, haul route, building and tenant improvements, temporary street closures, and associated permits; and

- Other discretionary and ministerial permits and approvals that may be deemed necessary.

Initial Study

Attachment B: Explanation of Checklist Determinations

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

I. Aesthetics

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

The related City of Los Angeles Department of City Planning Zoning Information File No. 2452 (ZI 2452) provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or

any other aesthetic impact as defined in the City's *L.A. CEQA Threshold Guide* shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

PRC Section 21099 applies to the Project. As shown in Figure A-2 in Attachment A, the Project is a mixed-use residential development, which is entirely within 0.5 mile of a major transit stop (i.e., the 7th Street/Metro Center Station portal approximately 550 feet north of the Project Site). Therefore, the Project is exempt from aesthetic impacts. The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

Would the project:

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

No Impact. A significant impact may occur if a project would have a substantial adverse effect on a scenic vista. Although the City General Plan and Central City Community Plan do not clearly define what views are considered "scenic vistas," the City's Mobility Plan 2035 indicates that one of the scenic features taken into consideration when designating scenic highways includes "city views,"[1] which suggests that the City has assigned value to such views. Therefore, for purposes of this analysis, the Downtown Los Angeles skyline is considered a scenic resource and views of it are considered scenic vistas. This skyline is visible from several observation points throughout the City and beyond its boundaries. As described in Attachment A, Project Description, of this Initial Study, the Project would develop a 39-story high-rise residential tower that would include 409 residential units and approximately 7,329 square feet of ground floor commercial/retail/restaurant uses. The Project Site, as it is currently occupied by a low-rise parking structure and a surface parking lot, has minimal city views due to tall structures on adjacent parcels and the area's relatively flat topography. Distant panoramic views of downtown Los Angeles are available from a variety of vantage points in the Hollywood Hills to the north. From the area, however, scenic vistas of other visual resources in the area, including the Hollywood Hills, are generally not available. As is the case under existing conditions, future views with implementation of the Project would continue to depict the highly urbanized downtown area. In addition, despite the increase in building height and density that would result from the Project, the Project Site would remain difficult to discern within the greater fabric of urban development. Rather, the Project would contribute to the downtown skyline views that are available from public rights-of-way and from the Hollywood Hills.

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

---

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

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

No Impact. A significant impact may occur if a project would substantially damage scenic resources within a state scenic highway. The Project Site is not located in proximity to a state-designated, City-designated scenic highway, or associated view corridor. In addition, the Project Site consists predominantly of paved surfaces devoid of landscaping. There are no unique geologic or topographic features located on the Project Site, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. The existing surrounding commercial strip structures are not considered scenic resources. As discussed further below, the Project Site does not include protected trees. Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic resources within a state scenic highway.

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 mid- and high-rise structures. The area surrounding the Project Site is characterized by buildings that vary in age, architecture, heights, massing, and materials. Furthermore, the area is interspersed with surface parking areas and parking structures, similar to the Project Site. While contemporary high-rise buildings dominate the visual landscape in the area surrounding the Project Site, there are also many older buildings with classic architectural styles located throughout the area.

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 would 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.

There are seven street trees located along 8th Street and Hope Street. None of the trees are of a species that is protected by the LAMC. All of these trees would be removed as part of the Project. These trees would be replaced on a minimum 2:1 basis or as determined by the Department of Public Works. Thus, the removal of these trees during construction activities would not substantially alter or degrade the existing visual character of the Project area.

Overall, while affecting the visual character of the Project area on a short-term basis, 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 an urban setting with a high level of human activity and development; 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. Pursuant to SB 743 and ZI 2452, Project construction would result in no impact to the visual character or quality of the site or its surroundings.

Operation

The Project Site is currently occupied by a four-level parking structure and a surface parking lot and is devoid of landscaping. There are no visual resources within the Project Site. As shown in the Conceptual Site Plan provided in Figure A-16 of Attachment A, Project Description, the high-rise residential building would be situated upon a five-story podium. The Project would be designed in a contemporary architectural style with a combination of glass, concrete, aluminum, and stone. The 39-story high-rise mixed-use building would be designed using vision and spandrel glass for the majority of the residential tower, with pre-finished aluminum and perforated metal panels for the podium.

As discussed above, the aesthetic environment of the Project vicinity reflects a variety of building types and architectural styles with a large number of high-rise structures. 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 and residential structures in the vicinity of the Project Site. Immediately to the north of the Project Site are two parking structures—an 8-story structure along Hope Street and a 5-level structure along Grand Avenue. Across Hope Street to the west of the Project Site is a recently-renovated business/commercial development (i.e., The Bloc), consisting of a department store, a hotel, gym, retail and restaurant uses, and an office tower. To the east of the Project Site is a mixed-use development (i.e., Eighth & Grand), consisting of a mid-rise residential complex with a ground floor market. To the south of the Project Site are multiple office/commercial buildings and other residential developments, including a high-rise residential tower (i.e., 8th+Hope) immediately to the southwest, two mixed-use high-rise buildings at 801 S. Grand Avenue and 888 S. Hope Street, and three other high-rise residential towers (i.e., Atelier, 845 S. Olive Street Tower, and 820 S. Olive Street Tower) to the southeast on Olive Street between 8th Street and 9th Street. In the Project vicinity, beyond these land uses are other high-rise commercial buildings and skyscrapers that are commercial, business, and residential in nature. In particular, the proposed maximum building height of up to 39 stories and approximately 499 feet would be consistent with other building heights in the vicinity, such as the Wilshire Grand Center that is approximately 1,100 feet in height (73 stories), the 777 Tower that is approximately 725 feet in height (52 stories), Ernst & Young Building that is approximately 534 feet in height (42 stories), the 801 Tower that is approximately 381 feet in height (24 stories), the Sheraton Hotel that is approximately 318 feet in height (24 stories), 801 S. Grand Tower that is approximately 300 feet in height (22 stories), and 8th+Hope Tower that is approximately 260 feet in height (22 stories). In addition, other high-rise residential projects in development include the 845

S. Olive Street Tower that would be approximately 350 feet in height (29 stories), the 820 S. Olive Street Tower that would be approximately 637 feet in height (49 stories), and the 888 S. Hope Street Tower (34 stories). Furthermore, the Project area continues to transform, with new and on-going development incorporating mixed-uses with mid- and high-rise buildings of contemporary design. Additionally, proposed parking on-site would be designed to maximize efficiency and minimize visual impacts. The parking to be provided on-site would be located within three subterranean levels and within three levels of the podium. Above-grade parking levels have been designed to not be visible from 8th Street, Hope Street, or Grand Avenue.

As part of the Project along the street frontage, a row of street trees would each be planted on Hope Street, 8th Street, and Grand Avenue. These trees would include, but not be limited to, London plane trees, pink trumpet trees, and southern magnolia trees.

Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Proposed signage would include mounted Project identity signage, building and commercial tenant signage, general ground-level and wayfinding pedestrian signage, and security markings in compliance with code requirements. Project identity signage would be located at a podium level to be visible from vehicular and pedestrian traffic. It would be an identifier for the project by using approved logo and brand standards. Commercial/retail/restaurant signage would complement the building architecture. Wayfinding signs would be located at parking garage entrances, elevator lobby, vestibules, and residential corridors. Commercial signage is limited to on-site commercial usage. No off-premises billboard advertising is proposed as part of the Project. All proposed signage would be designed in conformance to the applicable requirements of the LAMC, sign ordinance, and the Downtown Design Guide.

Overall, while the Project would change the visual character of the Project Site, the building height, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the Project vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site and the surrounding area. Pursuant to SB 743 and ZI 2452, Project operation would result in no impact to the visual character or quality of the site or its surroundings.

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. Shadows may provide positive effects, such as cooling effects during warm weather, or negative effects, such as the loss of natural light necessary for solar energy purposes, or the loss of warming influences during cool weather. 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 previously discussed, surrounding uses in the general vicinity of the Project Site include commercial and high density residential uses. Uses in the immediate vicinity of the Project Site include a parking structure for The Bloc to the west across Hope Street; the Sheraton Hotel and The Bloc to the northwest across Hope Street; parking structures, a small church (Christian Science Church – Third Church of Christ, Scientist), and a mid-rise commercial building fronting 7th Street to the north within the same block as the Project Site; and a mid-rise apartment building (8th and Grand) to the northeast and east across Grand Avenue. Of these nearby uses, the routinely usable outdoor uses associated with hotel and residential uses would be considered most sensitive to shading. As shown in the shadow diagrams provided in Appendix IS-1 of this Initial Study, these and other shadow-sensitive areas within the vicinity of the Project Site would not 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. Pursuant to SB 743 and ZI 2452, the Project would result in no impact with respect to shading.

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

No Impact. A significant impact may occur if a project would create a new source of light or glare which would adversely affect daytime or nighttime views in the area. The Project Site is located within a highly urbanized area and is largely surrounded by tall structures on adjacent parcels. The existing parking structure and surface parking lot on the Project Site currently generate moderate levels of artificial light and glare typical of urbanized areas. Light sources include low-level security lighting, vehicle headlights, and street lighting. Glare sources include glass and metal building and vehicle surfaces. Other sources of light in the Project vicinity include pole-mounted street lights along the adjacent streets and signage and architectural lighting from nearby towers.

The Project would introduce new sources of light and glare that are typically associated with residential and commercial buildings, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Surrounding uses with views of the Project Site that are considered sensitive relative to nighttime light include residential uses. 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 nearby residential uses, including those immediately to the southwest (8th+Hope), to the south (801 S. Grand Avenue), and to the east (8th and Grand), and motorists on surrounding streets.

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. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur. 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. Therefore, construction activities would not result in a new source of substantial light to adversely affect nighttime views in the area.

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 such, construction activities would not result in a new source of substantial light to adversely affect daytime views in the area. Therefore, there would be a negligible potential for daytime glare associated with construction activities to occur.

Pursuant to SB 743 and ZI 2452, Project construction would result in no impact with respect to light or glare.

Operation

The Project would increase the number of vehicle trips to and from the Project Site. However, the Project would eliminate sources of glare associated with the existing surface parking lot. New sources of artificial lighting that would be introduced by the Project would include low-level interior lighting visible through the windows of the residential tower; signage lighting; architectural lighting on the building, including lighting associated with outdoor uses (e.g., podium and roof decks) and activities; low-level security and wayfinding lighting; landscape lighting; and automobile headlights. 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 Project vicinity 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 lights, including lights on the podium deck and roof deck (Level 38), would be directed toward the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. Project lighting would also meet all applicable LAMC lighting standards. As required by LAMC Section 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed

windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

As discussed above, Project signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. In general, new signage would be architecturally integrated into the design of the building and would establish appropriate identification for the commercial and residential uses. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting solutions that would minimize light trespass from the Project Site. Project lighting would follow the streetscape lighting standards as established by the Downtown Design Guide. In accordance with the LAMC (Chapter 1, Article 4.4, Section 14.4.4E), illumination used for Project signage would be limited to a light intensity of 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

With regard to glare, the Project would be designed in a contemporary architectural style and would feature various surface materials. Building materials could include different types of glass, concrete, aluminum, and stone. Specifically, the 39-story high-rise mixed-use building would be designed using vision and spandrel glass for the majority of the residential tower, with pre-finished aluminum and perforated metal panels for the podium. In order to meet the requirements of Title 24, a high performance coating is needed for the exterior glazing so as to obtain as much transparency as possible and to avoid the dark, heavily tinted windows of previous generations. The glass coating would be carefully selected in order to achieve as much transparency as possible within the limits of Title 24 with as low reflectivity as possible. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking areas would be located either below-ground or screened from view above-ground, which would eliminate the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night. While headlights from vehicles entering and exiting the Project's driveways would be visible from the residential receptors immediately southwest, south, and 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.

Lighting and glare associated with 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. Pursuant to SB 743 and ZI 2452, Project operation would result in no impact with respect to light and glare.

II. Agricultural and Forest Resources

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

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with a low-rise parking structure and a surface parking lot. In addition, the uses surrounding the Project Site include commercial and residential uses. 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.[2] As such, the Project would not convert farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is zoned by the LAMC as C2-4D, which permits various commercial and residential uses. Furthermore, no agricultural zoning is present in the surrounding area, and the Project Site and surrounding area are not enrolled under the California Land Conservation Act often referred to as the Williamson Act Contract.[3] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

---

[2] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

[3] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

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 a low-rise parking structure and a surface parking lot. The Project Site does not include any forest or timberland. In addition, the Project Site is currently zoned for commercial and residential land uses. The Project Site is not zoned for or used as timberland or forest land.[4] 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 analysis of this topic in the 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 to forest land would occur, and no further analysis of this topic in the EIR is required.

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

No Impact. As described above, the Project Site is located within an urbanized area 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.[5] 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 analysis of this topic in the EIR is required.

III. Air Quality

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

---

[4] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

[5] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Pursuant to the federal Clean Air Act, within the Basin, the South Coast Air Quality Management District (SCAQMD) is required to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone; particulate matter less than 2.5 microns in size [$PM_{2.5}$]). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. In part, these strategies are 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.[6] 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.

The Project would be subject to the SCAQMD's 2016 AQMP. 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.

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

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

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). 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. The Project Site is located approximately 1,700 feet from the closest freeway to the west (SR-110/Harbor Freeway). During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, energy consumption, and other on-site activities. Therefore, the EIR will provide further analysis of the Project's construction and operational air pollutant emissions.

---

[6] *SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.*

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

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone and $PM_{2.5}$ and partial non-attainment for lead. The Basin is also in non-attainment of state air quality standards for ozone, $PM_{2.5}$, and particulate matter less than 10 microns in size (PM_{10}). Thus, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, 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 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. To the east of the Project Site is a mid-rise residential complex (i.e., Eighth & Grand) with a ground floor market. To the south, southeast, and southwest are high-rise and mixed-use residential towers, including 8th+Hope immediately to the southwest, two mixed-use high-rise buildings at 801 S. Grand Avenue and 888 S. Hope Street, and three other high-rise residential towers (i.e., Atelier, 845 S. Olive Street Tower, and 820 S. Olive Street Tower) to the southeast on Olive Street between 8th Street and 9th Street. Therefore, 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. Construction of the Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

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. The proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions.[7] In addition, 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.

---

[7] *SCAQMD, Rule 1138, Control of Emissions from Restaurant Operations.*

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, 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.[8]

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 the EIR is required.

IV. Biological Resources

Would the project:

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with a low-rise parking structure and a surface parking lot. The Project Site is devoid of any landscaping. Due to the developed nature of the Project area and the lack of open space areas, species likely to occur on-site and the Project area are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is developed with a low-rise parking structure and a surface parking lot. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[9,10,11] Thus, the Project would not

---

[8] *SCAQMD, Rule 402, Nuisance.*

[9] *California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed July 10, 2017.*

have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with a low-rise parking structure and a surface parking lot. No water bodies or federally protected wetlands, as defined by Section 404 of the Clean Water Act, exist on the Project Site or in the vicinity.[12] As such, the Project would not have any effect on federally protected wetlands. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is developed with a low-rise parking structure and a surface parking lot. There are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity.

According to the Native Tree Protection Report prepared for the Project and included as Appendix IS-2 of this Initial Study, there are no protected trees located within the Project Site and property. Additionally, no native trees are located on properties adjacent to the construction zone or in areas of impact. Nevertheless, although unlikely, the seven existing ornamental street trees along the Project Site could potentially provide nesting sites for migratory birds. During construction, the removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged

---

[10] *California Department of Fish and Wildlife, CDFW Lands, https://www.wildlife.ca.gov/Lands, accessed July 10, 2017.*

[11] *United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed July 10, 2017.*

[12] *United States Environmental Protection Agency, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed July 10, 2017.*

with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with this existing regulatory requirement, impacts to nesting and migratory birds would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), Southern California Black Walnut, Western Sycamore, and California Bay Laurel 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 each protected tree removed is replaced by at least two trees of a protected variety (i.e., 2:1 basis).

As discussed above, the Project Site is devoid of any landscaping. The street trees lining Hope Street and 8th Street are not of the species protected under the City of Los Angeles Protected Tree Ordinance.

Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the street trees would be replaced on a 2:1 basis, at a minimum. In accordance with LAMC requirements, 118 new trees and shrubs would be planted within the Project Site, including the 16 trees at ground level along Hope Street, 8th Street, and Grand Avenue. The new tree species would be drought-tolerant and/or climate-adapted nature. Thus, the planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. Therefore, impacts related to conflict with any local policies or ordinances protecting biological resources would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with a low-rise parking structure and a surface parking lot. As previously described, the Project Site is devoid of any landscaping;. There are seven ornamental street trees along 8th Street and Hope Street. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat

conservation plans apply to the Project Site.[13] 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 analysis of this topic in the EIR is required.

V. Cultural Resources

Would the project:

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

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines 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 Section 5020.1(k) of the Public Resources Code (PRC)); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historic resources throughout the City.

The Project Site is currently developed with a low-rise parking structure and a surface parking lot and does not contain any historic resources. Similarly, a review of the City's Historical Cultural Monuments List was conducted, which did not identify any historical cultural monuments adjacent to the Project Site. However, in the northern portion of the block containing the Project Site, fronting along 7th Street, is the Boston Store–J.W. Robinson's Building, which is a designated City Historic-Cultural Monument (HCM #357).[14] Nonetheless, this building is located approximately 250 feet north of the Project Site and is physically separated from the Project Site by a 5-level parking structure along Grand Avenue and an 8-story parking structure and a small church (Christian Science Church—Third Church of Christ, Scientist) along Hope Street. Therefore,

---

[13] *California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017.*

[14] *City of Los Angeles Department of City Planning, Historic-Cultural Monument (HCM) List, City Declared Monuments, February 2, 2017.*

impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric , building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. The records search conducted for the Project Site by the South Central Coastal Information Center (SCCIC) indicates that there is a known archaeological resource within a 0.5-mile radius of the Project Site.[15]

However, given the maximum depth of excavation for Project development would be approximately 50 feet below the existing ground surface, there is a possibility that archaeological artifacts that were not recovered during prior construction or other human activity may be present. Consequently, 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 Section 21083.2 of the PRC and Section 15064.5(c) of the CEQA Guidelines, 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 Section 21083.2 and 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 analysis of this topic in the EIR is required.

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

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. The records search conducted for the Project Site by the Los Angeles County Natural History Museum indicates that although the Project Site has been previously graded and developed, the Project would result in excavations on the Project Site up to 50 feet below existing grade, and it may be possible that deeper-lying paleontological artifacts that were not recovered

---

[15] *The records search is included as Appendix IS-3 of this Initial Study.*

during prior construction or other human activity may be present.[16] Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

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

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with State law, including Section 15064.5 of the CEQA Guidelines, Section 5097.98 of the PRC and Section 7050.5 of the California Health and Safety Code. 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. Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Project's impact on human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

VI. Geology and Soils

The following analysis is based, in part, on the Preliminary Geotechnical Engineering Investigation (Geotechnical Report) prepared for the Project by Geotechnologies, Inc., dated April 4, 2017, and included as Appendix IS-4 of this Initial Study. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted.

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.[17] 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*

---

[16] *The records search is included as Appendix IS-3 of this Initial Study.*

[17] *California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, Case No. S213478.*

decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts:

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

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

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. Additionally, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on the Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study, the Project Site is not within a currently established Alquist–Priolo Earthquake Fault Zone. In addition, the Project Site is not located within a City-designated Fault Rupture Study Area.[18] While the closest active fault is the Puente Hills Blind Thrust, which is located approximately 0.45 mile of the Project Site, no active or potentially active faults underlie the Project Site.[19] Therefore, the potential for surface ground rupture at the Project Site due to faulting beneath the Project Site during the life of the proposed development is considered low, and the Project

---

[18] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

[19] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

would not exacerbate existing fault rupture conditions. In addition, compliance with the existing state and local regulations, including the 2016 California Building Code and the City of Los Angeles Building Code, would ensure the Project is consistent with applicable seismic design criteria and with existing seismic safety regulations. The Project would ensure that structures are built to a level that withstands acceptable seismic risk. Therefore, the Project would not expose people or structures to substantial adverse effects associated with fault rupture and would not cause or exacerbate seismic conditions at the Project Site. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

ii. Strong seismic ground shaking, caused in whole or in part by the project's exacerbation of 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. As discussed above, the closest active fault is the Puente Hills Blind Thrust, which is located approximately 0.45 mile from the Project Site. The potentially significant impacts related to seismic ground shaking at the Project Site would not be 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. 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. The Geotechnical Report contains preliminary recommendations for the type of engineering practices that would be used. Additionally, a final design-level geotechnical report will be prepared by the Project 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 Report, 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 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 provide for the latest in 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 LABC. 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 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 the EIR is required.

iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of 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.

Furthermore, the Project Site is not located within a liquefaction zone as classified by the State of California.[20] Similarly, the City of Los Angeles does not identify the Project Site in an area that is susceptible to liquefaction.[21,22] According to the Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study, during the exploratory borings conducted for the investigation, groundwater was encountered at a depth of 130 feet below the existing site grade. The historically highest groundwater level was also found to be approximately 70 feet below the existing site grade. Based on the dense nature of the underlying soils and depth to the historically highest groundwater level, the potential for liquefaction at the Project Site is considered to be remote. Thus, the Project would not expose people or structures to substantial adverse effects associated with liquefaction, and the Project would not exacerbate existing conditions with regard to seismic ground failure, including liquefaction. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

iv. Landslides, caused in whole or in part by the project's exacerbation of 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 characterized by relatively flat topography. The Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study confirms the general lack of elevation difference across or

---

[20] *California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, released March 25, 1999, and updated November 6, 2014.*

[21] *City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed March 29, 2017.*

[22] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

adjacent to the Project Site. In addition, the Project Site is not located in a landslide area as mapped by the State.[23] Furthermore, the Project Site is not mapped as a landslide area by the City of Los Angeles.[24,25] 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 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 analysis of this topic in the 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 excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project construction would have 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. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed and/or landscaped. 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 the EIR is required.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, 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 IV.a.iii above, based on the depth to groundwater, subsidence and liquefaction are unlikely at the Project Site. Therefore, the Project would not exacerbate existing conditions with regard to geologic or soil

---

[23] *California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, released March 25, 1999, and updated November 6, 2014.*

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

[25] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

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

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site consists of 3 to 6 feet of existing fill material with alluvium soils found below. The fill primarily is comprised of silty sand and sandy silt. The deeper alluvium below is comprised of sand, occasional gravel, and some clayey to sandy silt, and are dense to very dense. The Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study identifies the on-site geologic materials near surface soils to be in the moderate expansion range and the deeper materials in the infiltration zone to be in the low expansion range. Furthermore, construction of the Project would be required to comply with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design level geotechnical investigation required by the City. Thus, the Project would not exacerbate existing environmental conditions with regard to expansive soil. Impacts with respect to expansive soils 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 waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project Site is located within a community served by existing sewer infrastructure. The Project's wastewater demand would be accommodated via 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 impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

VII. Greenhouse Gas Emissions

Would the project:

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHG) since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The

accumulation of GHGs in the atmosphere regulates Earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHG emissions in California. Activities associated with the Project, including construction and operational activities, would generate GHG emissions. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts related to GHG emissions.

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

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

VIII. Hazards and Hazardous Materials

The following analysis is based, in part, on the *Environmental Site Assessment-Phase I* (Phase I ESA) prepared for the Project by California Environmental Geologists & Engineers, Inc., dated February 2017. All specific information on historic and existing on-site conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-5 of this Initial Study.

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

Would the project:

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

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential and

commercial uses, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. However, 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. Such requirements include obtaining material safety data sheets form chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Any associated risk would be 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 the EIR is required.

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

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. As discussed therein, the Project Site consists of a parking structure constructed in 1970 and an asphalt paved parking lot.

At the time of the site reconnaissance, there was no evidence of significant hazardous substance use on the Project Site. In addition, there was no evidence of aboveground storage tanks (ASTs), underground storage tanks (USTs), any containers of hazardous or unidentified substances, on-site disposal or landfill of solid waste, poly-chlorinated biphenyls (PCBs), heating and cooling equipment, wastewater treatment or disposal systems, or wells (i.e., dry wells irrigation wells, injection wells, abandoned wells, monitoring wells, etc.). There was no evidence of pits, ponds, lagoons, unusual odors, or stressed vegetation. Although minor oil staining was observed on the Project Site, there was no evidence of significant staining or residue.

Due to the age of the parking structure currently located on the Project Site, the Phase I ESA recommended that an asbestos survey be conducted by a certified asbestos consultant prior to demolition. It is also possible that lead-based paint was utilized on-site. In the event any suspect asbestos-containing materials or lead-based paint coatings are found, the Project would adhere to all federal, state, and local regulations prior to their removal. Mandatory compliance with applicable federal and state standards and procedures would reduce associated risks to less-than-significant levels.

The current uses of the Project Site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal, or generation of significant quantities of hazardous

substances or petroleum products. As described above, there was no evidence or record of USTs and ASTs. In the event an undocumented UST is identified on-site, it would be appropriately documented and removed according to Los Angeles Fire Department (LAFD) regulations. The Project Site is located within a Methane Buffer Zone identified by the City.[26] Prior to construction, methane testing would be conducted adhering to Department of Building and Safety regulations. In the event methane levels exceed acceptable levels, appropriate design measures will be identified in accordance with the methane seepage regulations contained in the LAMC (Chapter 9, Article 1, Division 71, Section 91.7104) and included in the Project's design.[27] Therefore, there is a negligible risk of subsurface methane release. No other recognized environmental concerns or historic recognized environmental concerns were identified on the Project Site.

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 hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the 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 public school sites located within a 0.25-mile radius of the Project Site. The Miguel Contreras Learning Complex is located approximately 0.75 mile northwest of the Project Site at 322 Lucas Avenue. John H. Liechty Middle School is located approximately 0.80 mile northwest of the Project Site at 650 S Union Avenue. Ninth Street Elementary School is located approximately 0.87 mile southeast of the Project Site at 835 Stanford Avenue. In addition, 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 and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Project operation would involve the limited use of hazardous materials typically used in the maintenance of office and retail uses (e.g., cleaning solutions, 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. The Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, 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 standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements discussed above in Response to Checklist Question VIII.a. As such, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than

---

[26] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 2017.*

[27] *Methane seepage regulations adopted by Ordinance No. 175,790, February 2004.*

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

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

Less Than Significant Impact. Section 65962.5 of the California Government Code 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 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 Resources Control 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 Project Site is not identified on the standard environmental government lists researched as part of the Phase I ESA, including those compiled pursuant to Government Code Section 65962.5. The nearest listed contaminated site to the Project Site is approximately 260 feet north of the Project Site at 600 W. 7th Street and is a case that has been closed in 1995 regarding a leaking UST site. A release of diesel fuel at this off-site property affected soil only. It is considered unlikely the soil or groundwater beneath the Project Site is impacted by property.

As part of the Phase I ESA, soil gas and soil samplings were completed at the Project Site. There was no evidence of an on-site release of total petroleum hydrocarbons (TPH) and/or volatile organic compounds (VOCs). All Title 22 metals in the soil were found to be at natural background concentrations. The sporadic detections of VOCs in soil gas do not pose a vapor intrusion hazard for the proposed structure with subterranean parking using the current CalEPA accepted risk analysis. The soil test data indicate that unrestricted reuse and off-site transfer of excavated soil is acceptable.

As discussed above, Project operation would involve the limited use of hazardous materials typically used in the maintenance of office and retail uses (e.g., cleaning solutions, 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.

Based on the above, the Project would not have the potential to exacerbate current environmental conditions to create a significant hazard. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the 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 exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?

No Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Los Angeles International Airport (LAX) located approximately 10.5 miles southwest of the Project Site. Given the distance between the Project Site and LAX, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard. Therefore, no impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required. With regard to potential impacts to air traffic, see Checklist Question XVI.c, Transportation/Circulation, below.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. There are no private airstrips within the Central City Community Plan area. The nearest private airstrip is the Los Alamitos Army Airfield, which is approximately 21 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard. No impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan and County of Los Angeles Department of Public Works, the nearest designated disaster route to the Project Site is Figueroa Street approximately 870 feet to the east.[28,29] 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

---

[28] *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

[29] *County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.*

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 generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. 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 would be required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area without wildlands in its vicinity. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.[30,31] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the proposed residential and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

IX. Hydrology and Water Quality

The following analysis is based, in part, on the *Surface Water Hydrology and Water Quality Calculations-Technical Memo* (Hydrology Memo) prepared for the Project by KPFF, dated April 17, 2017. All specific information on hydrology and water quality conditions in the discussion below is from this memo unless otherwise noted. This report is included in Appendix IS-6 of this Initial Study.

---

[30] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed March 22, 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.*

[31] *City of Los Angeles General Plan Safety Element, November 1996, Exhibit D, Selected Wildfire Hazard Areas.*

Would the project:

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

Less Than Significant Impact. During Project construction, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into 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. Additionally, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Article 1, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant.

During operation, the Project would introduce sources of potential stormwater pollution that are typical of residential and commercial developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking and 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. 181,899), Best Management Practices (BMPs) would be implemented on-site to address City and state water quality requirements. To this end, BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The Hydrology Memo concluded that BMPs would be implemented to control pollutants associated with stormwater runoff in compliance with the LID Ordinance. The proposed landscaping would reduce the quantity and improve the quality of stormwater runoff generated on the Project Site. Based on the Geotechnical report prepared for the Project and included as Appendix IS-4 of this Initial Study, on-site infiltration would be feasible. This system would include infiltration drywells that would be strategically placed so as not to significantly impact the environment or existing infrastructure. With implementation of the required BMPs, impacts to water quality during operation would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact. According to the Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study, the historically highest groundwater level was found to be

approximately 70 feet below the existing ground surface. During the exploratory borings for the geotechnical investigation conducted for the Project Site, groundwater was encountered at a depth of 130 feet below the existing ground surface. Grading would consist of excavation to a maximum of 50 feet below the existing ground surface. Therefore, it is not anticipated that Project construction would require dewatering or other withdrawals of groundwater. Project construction would not deplete groundwater supplies or interfere with groundwater recharge.

In addition, operation of the Project would not interfere with groundwater recharge. As mentioned above, the Project Site is located in an urbanized area and is developed with a low-rise parking structure and a surface parking lot. The Project Site is devoid of landscaping and is entirely impervious. Therefore, the degree to which surface water infiltration and groundwater recharge currently occur on-site is negligible or non-existent. As the Project would include the addition of landscaped areas on the podium level, the amount of impervious surfaces would be less than 100 percent. As such, construction and operation of the Project would not affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, no impacts on groundwater would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The Project Site is composed entirely of an existing parking structure and a surface parking lot devoid of landscaping and is entirely impervious. The Project Site is not crossed by any water courses or rivers. Currently, stormwater runoff from the Project Site is conveyed by sheet flow into the concrete gutters along Hope Street, 8th Street, and Grand Avenue.

The Project Site is relatively flat with the majority of surface runoff draining in the southerly direction towards the gutter along 8th Street and conveyed to the existing catch basin at the corner of 8th Street and Hope Street. Stormwater runoff from the Project Site would be conveyed by new private underground storm drain pipes to connect to the street and into existing County drainage facilities along 8th Street. Due to the proposed planting areas on the podium level, the extent of proposed impervious surfaces would be less than 100 percent, which would be less than the existing conditions. Therefore, the Project would not increase the quantity of stormwater runoff. Since runoff would be reduced with the introduction of landscaped areas, existing storm drain infrastructure would not be adversely impacted.

The Los Angeles County Department of Public Works (LACDPW) Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. While the Project Site is entirely impervious under existing conditions, the Project would increase the amount of landscaped areas on the Project Site, which would reduce the percentage of stormwater runoff from the Project Site. The slight reduction in stormwater runoff due to Project

landscaping would slightly reduce peak flow rates during a 50-year storm event. Thus, the Project would not increase the stormwater flows from the Project Site. Additionally, during operation, the Project would implement BMPs to ensure compliance with LID requirements, as discussed above. A Final Plan Check as part of the permit process with the Los Angeles Department of Building and Safety (LADBS) would also ensure that there is adequate storm drain capacity available for the Project. The Applicant would be responsible for providing necessary infrastructure to serve the Project if it is determined to be necessary during the normal permit process. Thus, the Project would not alter the existing drainage pattern of the site or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

d. Substantially 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. As discussed in Checklist Question IX.c, Hydrology and Water Quality, above, the Project would not increase the quantity of stormwater runoff. Since runoff would be reduced with the introduction of landscaped areas, existing storm drain infrastructure would not be adversely impacted. Thus, the Project would not alter the existing drainage pattern of the site or surrounding area such that a substantial increase in the rate or amount of surface runoff, or on- or off-site flooding, would occur. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. As discussed in Checklist Questions IX.a and IX.c, Hydrology and Water Quality, above, the Project would implement standard erosion controls during site preparation and grading to reduce the effects of sedimentation and erosion. During operation, the Project would comply with the City's LID Ordinance and implement BMPs to address City and state water quality requirements.

In addition, the Project would not increase the quantity of stormwater runoff. Since runoff would be reduced with the introduction of landscaped areas, existing storm drain infrastructure would not be adversely impacted. Thus, the Project would not alter the existing drainage pattern of the site or surrounding area such that a substantial increase in the rate or amount of surface runoff, or on- or off-site flooding, would occur. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed in Checklist Question IX.a, Hydrology and Water Quality, above, the Project would implement standard erosion controls during site preparation and grading to reduce the effects of sedimentation and erosion. During operation, the

Project would comply with the City's LID Ordinance and implement BMPs to address City and state water quality requirements.

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

No Impact. The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.[32,33] Thus, the Project would not place housing within a 100-year flood hazard area. The Project Site is located within an area designated as FEMA Zone X, which denotes an area where potential for flooding is minimal. In addition, there are no surface water bodies in the vicinity. 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 plain structures which would impede or redirect flood flows?

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain area. Thus, the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. Therefore, no impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin or within a dam inundation area.[34] Accordingly, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would not occur. Therefore, no impacts related to flooding as a result of a levee or dam failure would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

---

[32] *Federal Emergency Management Agency, Flood Map Service Center, Map Number 06037C1620F, effective on September 26, 2008, http://fema.maps.arcgis.com/home/webmap/viewer.html?webmap=cbe088e7c8704464aa0fc34eb99e7f30&extent=-118.27863443136648,34.04090259569466,-118.23902356863351,34.05263701013018, accessed March 30, 2017.*

[33] *City of Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains.*

[34] *City of Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas.*

j. Inundation by seiche, tsunami, or mudflow?

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

The Project Site is approximately 15 miles east of the Pacific Ocean. There are no surface water bodies in the vicinity. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[35] The nearest body of water to the Project Site is the MacArthur Park Lake, approximately 1.3 miles northwest of the Project Site. The nearest reservoir is the concrete-lined, off-stream Silver Lake Reservoir, which is not held by a dam, located approximately 3.2 miles north of the Project Site. Thus, inundation as a result of seiche is unlikely. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Since both the state and City do not identify the Project Site within an area prone to landslides, the potential for the Project Site to be inundated by mudflows is also low.[36] Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located in a highly urbanized area. Surrounding uses in the vicinity of the Project Site include the commercial, retail, restaurant, and parking uses. The Project Site is adjacent to an eight-story parking structure, a five-level parking structure, a church, and a commercial building fronting 7th Street to the north. The Bloc, which consists of a department store, hotel, gym, commercial/retail uses, office, and a parking structure are also located to the west of the Project Site across Hope Street. East of the Project Site is a mixed-use development that consists of a market and a high density residential complex. South of the Project Site are multiple office/commercial buildings, a mixed-use development, and a high density residential complex (8th+Hope). Beyond these land uses are other high-rise commercial, mixed use, and residential buildings in the vicinity. The majority of the Central City Community Plan area consists of commercial uses, with smaller pockets of multi-family residential, open space, and public facilities.

---

[35] *City of Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazards Areas.*

[36] *See Section VI, Geology and Soils, above.*

The Project would replace the existing low-rise parking structure and surface parking lot with a new mixed-use project comprised of 409 residential units and 7,329 feet of commercial uses. The proposed uses are consistent with types of land uses already present or under construction in the surrounding area. In addition, all proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. Impacts 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 applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As discussed in Attachment A, Project Description, the Project requests several discretionary approvals, including a Transfer of Floor Area Rights (TFAR) for the transfer of greater than 50,000 square feet of floor area from the City of Los Angeles-owned Los Angeles Convention Center to the Project Site; a Vesting Tentative Tract Map to create one ground lot comprising the entire site and six airspace lots and to permit parking deviation; a site plan review; a haul route permit; construction permits; and other discretionary and ministerial permits and approvals that may be deemed necessary. Accordingly, further analysis of this topic in the EIR is required to determine the Project's consistency with the LAMC, the Community Plan, and other 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 of the City of Los Angeles and is currently developed with a low-rise parking structure and a surface parking lot. As previously described, the Project Site is devoid of any landscaping. As discussed above in Section IV, Biological Resources, the Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

XI. Mineral Resources

Would the project:

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

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. In addition, the Project Site is not located within a mineral producing area as classified by the California Geological Survey.[37] The Project Site is also not located within a City-designated oil field or oil drilling area.[38] 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 analysis of this topic in the EIR is required.

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

No Impact. As discussed in Checklist Question XI.a, Mineral Resources, above, no mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. In addition, the Project Site is not located within a mineral producing area as classified by the California Geological Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a locally-important mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

XII. Noise

Would the project result in:

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

---

[37] *California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves, 2012.*

[38] *City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed March 29, 2017.*

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise. The predominant source of noise in the Project area is associated with traffic from roadways. Existing on-site noise sources primarily include vehicle noises associated with the low-rise parking structure and surface parking lot. During Project construction activities, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, with the introduction of new permanent residential and commercial uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further analysis of this topic will be provided in the EIR.

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

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration in association with demolition, site grading and clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further analysis of this topic 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. Traffic and human activities associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, further analysis 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, Noise, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further analysis 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 2 miles of an airport or within an area subject to an airport land use plan. The closest airport is LAX located approximately 10.5 miles southwest of the Project Site. Given the distance between the Project Site and LAX, the Project would not have the potential to expose people that reside or work in the Project Area to excessive

noise levels. Therefore, no impacts would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

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

XIII. Population and Housing

Would the project:

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

Less Than Significant Impact. The Project would result in the construction of 409 new residential dwelling units. As such, the Project would increase the residential population of the City of Los Angeles. 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 2017 is approximately 3,981,911 persons.[39] 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.[40] According to the City of Los Angeles Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.44 persons per unit.[41] Applying this factor, development of 409 units would result in a net increase of approximately 998 residents. The

---

[39] *Based on a linear interpolation of 2012–2040 data.*

[40] *Based on a linear interpolation of 2012–2040 data.*

[41] *Per correspondence with Jack Tsao from the Los Angeles Department of City Planning on March 29, 2017, based on the 2015 American Community Survey 5-year average estimate (2011–2015), the rate of persons per household for multiple-family units is 2.44 persons per unit.*

estimated 998 new residents generated by the Project would represent approximately 0.91 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2017 and 2021. 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 2017 is approximately 1,390,643 households.[42] In 2021, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,442,757 households.[43] Thus, the Project's 409 new residential units would constitute up to approximately 0.78 percent of the housing growth forecasted between 2017 and 2021. Therefore, the Project's housing units would be well within SCAG's housing projection for the Subregion. As emphasized in many regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new dwelling units to serve both the current population and the projected population. By developing 409 new residential dwelling units, the Project would help to fulfill this demand.

With regard to employment, the Project's 7,329 square feet of commercial/retail/restaurant uses would generate approximately 20 employees based on employee generation rates developed by the Los Angeles Unified School District (LAUSD).[44] In addition, approximately three employees are estimated for the operation of the residential tower (i.e., leasing management and maintenance staff). According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2017 is approximately 1,780,811 employees.[45] In 2021, the projected occupancy year of
the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,848,339 employees.[46] Thus, the Project's estimated 23 employees would constitute approximately 0.03 percent of the employment growth forecasted between 2017 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.

As analyzed above, the 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.

---

[42] *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.*

[43] *Based on a linear interpolation of 2012–2040 data.*

[44] *Based on the Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11, the employee generation rate for "Neighborhood Shopping Center" land use (i.e., 0.00271 employee per average square foot) is applied.*

[45] *Based on a linear interpolation of 2012–2040 data.*

[46] *Based on a linear interpolation of 2012–2040 data.*

No further analysis of this topic in the EIR is required. With regard to cumulative population and housing impacts, please see Checklist Question XVIII.b, below.

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

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

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

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

XIV. Public Services

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

a. Fire protection?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services to the Project Site. The Project would substantially increase the square footage of development on-site compared to existing conditions and introduce a residential population, which could result in the need for new or physically altered LAFD facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on fire protection services provided by the LAFD.

b. Police protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services to the Project Site. The Project would substantially increase the square footage of development on-site compared to existing conditions and introduce a residential population, which could result in the need for new or physically altered LAPD facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of

this topic in the EIR is required to determine the Project's potential impacts on police protection services provided by the LAPD.

c. Schools?

Potentially Significant Impact. The Project Site is located within the boundaries of the LAUSD. The 998 residents generated by the Project may result in an increased demand for LAUSD school facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on school services and facilities provided by the LAUSD.

d. Parks?

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

e. Other public facilities?

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

No other public services would be notably impacted by the Project. Therefore, the Project would have no impacts on other public facilities. No further analysis of other public facilities in the EIR is required.

XV. Recreation

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

Potentially Significant Impact. As discussed above in Checklist Question XIV.d, Public Services, the new residents associated with the Project could result in an increased demand for the existing public parks and recreational facilities that serve the Project Site, possibly resulting in the physical deterioration of those facilities. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on parks and recreational facilities provided by the LADRP.

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

Potentially Significant Impact. The Project would provide a number of indoor and outdoor open space areas and recreational amenities, including 42,852 square feet[47] spread over four levels plus 9,400 square feet[48] of private balcony open space. The facilities would include a pool, dog parks, outdoor lounges, barbeques, a juice bar, a dining garden area, a club room, and an indoor fitness studio. The potential environmental impacts of constructing these facilities are analyzed throughout this Initial Study and will be further analyzed in the EIR for those topics where impacts could be potentially significant as part of the overall Project.

XVI. Transportation/Traffic

Would the project:

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

Potentially Significant Impact. The Project proposes development that has the potential to result in an increase in daily and peak hour traffic within the Project vicinity. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees and visitors would generate daily vehicle, pedestrian, bicycle, and public transit trips. The resulting increase in the use of the area's transportation facilities could exceed roadway and transit system capacities. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on the roadway and transit system.

---

[47] *Section 12.21-G of the LAMC states that recreation rooms of at least 600 square feet or greater may count as common open space but cannot qualify for more than 25 percent of the total required usable open space. The Project proposes 19,282 square feet of indoor open space. However, pursuant to Section 12.21-G of the LAMC, the Project is able to consider only 10,806 square feet of 19,282 square feet as qualified indoor open space.*

[48] *Section 12.21-G of the LAMC states that private open space is permitted to include no more than 50 square feet per dwelling unit attributable to the total required usable open space. With 409 dwelling units, the Project's 9,400 square feet of private balcony open space provides less than the maximum square footage allowed.*

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

Potentially Significant Impact. The Los Angeles County Metropolitan Transportation Authority (Metro) administers the Congestion Management Program (CMP), a state-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on CMP facilities.

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

Less Than Significant Impact. The Project proposes a new 499-foot, 39-story,[49] high-rise residential tower with ground floor commercial/retail/restaurant uses. The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. The nearest airport is LAX located approximately 10.5 miles southwest of the Project Site. Given the distance between this airport and the Project Site, the Project would not result in a change in air traffic patterns that would produce substantial safety risks.

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

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

No Impact. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the residential and commercial uses in the Project vicinity. Thus, no impacts related to increased

---

[49] *The roof was referred to as the 40th story in the Entitlement Application for the Project.*

hazard to a design feature would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

e. Result in inadequate emergency access?

Potentially Significant Impact. While it is expected that construction activities for the Project would primarily be confined within the Project Site, construction activities could potentially require temporary and intermittent lane closures on adjacent streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. In addition, once constructed, the Project Site would include more dense development than currently exists and modify site access. Therefore, further analysis of this topic in the 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?

Potentially Significant Impact. There are multiple public transportation opportunities in the immediate vicinity of the Project Site. In particular, the Metro 7th Street/Metro Center Station is located approximately 350 feet north of the Project Site at the northwestern corner of Hope Street and 7th Street. This station is served by Metro's Red, Purple, Blue, and Expo rail lines along with the Silver Line limited-stop bus route. Additionally, the Metro and Los Angeles Department of Transportation (LADOT) operate numerous bus lines with stops located in close proximity to the Project Site. The Project proposes new development that has the potential to result in an increased demand for alternative transportation modes. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

XVII. Tribal Cultural Resources

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

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

Less Than Significant Impact. As discussed above in response to Checklist Question V.a, Cultural Resources, the Project Site is currently developed with a low-rise parking structure and a surface parking lot and does not contain any historic resources Therefore, impacts would be less

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

ii. Cause a substantial adverse change in the significance of site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?

Potentially Significant Impact. Approved by Governor 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 require excavations to previously undisturbed depths. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

XVIII. Utilities

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 operation of the Project would be collected and discharged into one existing sewer main along Hope Street and one along Grand Avenue and conveyed to the Hyperion Water Reclamation Plant (HWRP) located in Playa Del Rey. The HWRP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles–Glendale Water Reclamation Plant (LAGWRP). The treatment capacity of the entire Hyperion Treatment System is approximately 550 million gallons per day (mgd) (consisting of 450

mgd[50] at HWRP, 80 mgd[51] at TWRP, and 20 mgd[52] at LAGWRP). The HWRP is designed to treat 450 mgd, with annual increases in wastewater flows limited to 5 mgd by the Sewer Allocation Ordinance (City Ordinance No. 166,060). The HTP currently processes an average of 275 mgd on dry weather days and, therefore, has an available capacity of approximately 175 mgd.[53]

Incoming wastewater to the HWRP initially passes through screens and basins to remove coarse debris and grit and large solids. This is followed by primary treatment, which is a physical separation process where solids are allowed to either settle to the bottom of tanks or float on the surface. 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. After treatment is completed, the water is dispersed 5 miles offshore at a depth of 200 feet. As this treated effluent enters the ocean environment, it is diluted at a ratio of over 80 parts seawater to one part treated effluent. The discharge of effluent from the HWRP into Santa Monica Bay is regulated by the HWRP's NPDES Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's (RWQCB) requirements for recreational beneficial use. Accordingly, the HWRP's effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.

The wastewater generated by the Project would be typical of commercial and residential uses. No industrial discharge into the wastewater system would occur. As the HWRP 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 analysis of this topic in the EIR is required.

---

[50] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=7u4vnxjs2_1796&_afrLoop=1736734617710097#!, accessed April 14, 2017.*

[51] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Donald C. Tillman Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=7u4vnxjs2_1796&_afrLoop=1736474174443544#!, accessed April 14, 2017.*

[52] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Los Angeles–Glendale Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=7u4vnxjs2_1796&_afrLoop=1736575544717143#!, accessed April 14, 2017.*

[53] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=7u4vnxjs2_1796&_afrLoop=1736734617710097#!, accessed April 14, 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. Construction of the Project would result in increased water demand and wastewater generation from the Project Site. With regard to water, the location, condition, and capacity of water conveyance lines will be evaluated in the EIR to determine whether adequate capacity is available to accommodate the required fire flows and domestic water demand generated by the Project.

With regard to wastewater, as described in response to Checklist Question XVIII.a, above, wastewater generated during Project operation would be collected and discharged into existing sewer mains and conveyed to the HWRP, which has an available treatment capacity of approximately 175 mgd. Wastewater from the Project site enters the system through an existing 8-inch sewer main on Hope Street and the 10-inch sewer main on Grand Avenue and flows through the remaining wastewater system to the HWRP.

Based on sewage generation factors established by LADPW, Bureau of Engineering (BOE), the Project would generate an average of approximately 60,765 gallons per day (gpd) of wastewater. Currently, the existing parking structure and parking lot generate an average of approximately 694 gpd. In total, when subtracting the current wastewater flows, the Project would generate a net daily flow of 60,071 gpd. Table B-1 on page B-48 summarizes the Project Site wastewater flows.

The City has approved the Sewer Capacity Availability Request for the Project, indicating that the existing 8-inch sewer main on Hope Street and the 10-inch sewer main on Grand Avenue would have adequate capacity to accommodate 90 percent and 10 percent of the additional infrastructure demand created by the Project, respectively.[54] Therefore, as the existing mains would accommodate 100 percent of the Project's infrastructure demand, the HWRP would have adequate capacity to serve the Project. No upgrades to existing sewer mains would be required.

Therefore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site, and impacts with respect to wastewater infrastructure would be less than significant. No mitigation measures are required, and no further analysis of this topic in the EIR is required.

---

[54] *City of Los Angeles Department of Public Works, Bureau of Engineering, Sewer Capacity Availability Request, February 14, 2017.*

Table B-1
Estimated Project Wastewater Generation

Land Use	Units	Generation Rate[a] (gpd)	Total Wastewater Generation (gpd)
Existing (to be removed)			
Parking Structure and Lot	34,694 sf	0.02/sf	694
Total Existing			*694*
Proposed			
Residential—Studio	157 du	75/du	11,775
Residential—1-bedroom	159 du	110/du	17,490
Residential—2-bedroom	93 du	150/du	13,950
Commercial Area	585 seats[b]	30/seat	17,550
Total Proposed			*60,765*
Project Net Wastewater Generation (Proposed – Existing to be Removed)			**60,071**

gpd = gallons per day

sf = square feet

du = dwelling units

[a] *Project wastewater generation was calculated using the City of Los Angeles Department of Public Works, Bureau of Engineering sewage generation factors (2012).*

[b] *The commercial area considered in the SCAR assumed that the 7,329 square feet of commercial uses proposed by the Project would comprise approximately 585 restaurant seats, which would represent the most conservative scenario.*

Source: KPFF, 8th and Grand/Hope Preliminary Civil Engineering Investigation, April 17, 2017 (see Appendix IS-7 of this Initial Study); Eyestone Environmental, 2017.

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

Less Than Significant Impact. As discussed in Checklist Question IX.c, Hydrology and Water Quality, stormwater flows from the Project Site would not increase with implementation of the Project. Additionally, the Project would provide appropriate on-site drainage improvements to better control runoff. As described above in Checklist Question IX.a, the Project would be required to comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. To this end, BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The proposed landscaping would reduce the quantity and improve the quality of stormwater runoff generated on the Project Site. This system would include infiltration drywells that would be strategically placed so as not to significantly impact the environment or existing infrastructure. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than

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

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

Potentially Significant Impact. The Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site. As previously discussed, the Project would result in an increase in water demand for water provided by LADWP. Therefore, further analysis of this topic will be provided in the EIR.

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

Less Than Significant Impact. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant. As described above, the HWRP has a capacity of 450 mgd and current wastewater flow levels are at 275 mgd, resulting in available capacity of 175 mgd. As discussed above and shown in Table B-1 on page B-48, the Project would result in an increase in a net wastewater generation of 60,071 gpd over existing conditions. The Project's increase in average daily wastewater flow of 60,071 gpd would represent approximately 0.03 percent of the 175 mgd remaining capacity. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. The impact would be less than significant, and no mitigation measures are required. No further analysis of this topic in the 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 (LASAN) 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 at a major Class III (municipal) landfills, while inert waste such as construction waste (e.g., concrete, sand, asphalt), yard trimmings, and earth-like waste are disposed of in unclassified landfills.[55] Ten Class III landfills and one unclassified landfill

---

[55] *The ten Class III landfills within Los Angeles County include Antelope Valley Recycling and Disposal Facility; Burbank Landfill; Calabasas Landfill; Chiquita Canyon Landfill; Lancaster Landfill; Pebbly Beach Landfill; San Clemente Island Landfill; Savage Canyon Landfill; Scholl Canyon Landfill; Sunshine Canyon City/County Landfill; Whittier (Savage Canyon) Landfill. The total number of Class III landfills within Los Angeles County excludes the Puente Hills Landfill, which closed on October 31, 2013. The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation Company Landfill.*

with solid waste facility permits are located within Los Angeles County.[56] In addition, two solid waste facilities convert, combust, or otherwise process solid waste for the purpose of energy recovery within the County: the Commerce Refuse-to-Energy Facility and Southeast Resource Recovery Facility in Long Beach.

The 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. Based on the most recent 2015 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 114.37 million tons as of December 31, 2015.[57] For the Class III landfills open to the City, the remaining total disposal capacity is approximately 96.46 million tons.[58] In 2015, the City of Los Angeles disposed of approximately 2.38 million tons of municipal solid waste at the County's Class III landfills open to the City and approximately 61,050 tons of transformed solid waste.[59,60] The 2.38 million tons of solid waste accounts for approximately 2.47 percent of the total remaining capacity (approximately 96.46 million tons) for the County Class III landfills open to the City. The unclassified landfill serving the County is the Azusa Land Reclamation, which currently has 57.56 million tons of remaining capacity and an average daily disposal rate of 846 tons per day.[61]

Based on the 2015 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2030 will not exceed the 2015 remaining permitted Class III landfill capacity of 114 million tons. This is beyond the Project's buildout year of 2021. Nonetheless, while there is no expected daily landfill capacity shortfall during the planning period,

---

[56] *County of Los Angeles Department of Public Works, Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

[57] *This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.*

[58] *County of Los Angeles Department of Public Works, Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

[59] *The Class III landfills open to the City of Los Angeles include Antelope Valley Recycling and Disposal Facility; Chiquita Canyon Landfill; Lancaster Landfill; Sunshine Canyon City/County Landfill. The Calabasas Landfill is not included as its wasteshed boundaries only include portions of the City but none that include the Project Site. The Calabasas Landfill wasteshed boundaries are defined by Los Angeles County Ordinance No. 91-0003 and shown in Sanitation Districts of Los Angeles County, Calabasas Landfill Wasteshed Map, http://lacsd.org/civicax/filebank/blobdload.aspx?blobid=2350, accessed April 17, 2017.*

[60] *These estimates are based on County of Los Angeles Department of Public Works, Solid Waste Information Management System, Detailed Solid Waste Disposal Activity Report by Jurisdiction of Origin, Los Angeles, Reporting Period: from January 2015 to December 2015. 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.*

[61] *County of Los Angeles Department of Public Works, Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

there are constraints that may limit the accessibility of Class III landfill capacity. These constraints include wasteshed boundaries, geographic barriers, weather, and natural disasters. Therefore, the Annual Report evaluated seven scenarios and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period in six of the seven scenarios. Only the scenario involving utilization of permitted in-county disposal capacity would result in a shortfall. As demonstrated by the single scenario resulting in a shortfall, reliance on existing permitted in-County landfill capacity alone is insufficient to meet long-term disposal needs.[62] The 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.

Under the City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan, the City has set a goal of becoming a "zero waste" city by 2030. To achieve this goal, the City has implemented a number of source reduction and recycling programs, such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[63] According to the Mayor's Sustainable City pLAn, 2nd Annual Report for 2016–2017, the City is currently diverting 76.4 percent of its waste from landfills, which is already greater than the 75-percent statewide recycling goal of Assembly Bill 341 set for 2020.[64] This plan has set goals of achieving 90 percent diversion by 2025 and 95 percent diversion by 2035.

Construction

The Project Site is currently developed as a low-rise parking structure and a surface parking lot. Pursuant to the requirements of SB 1374, the Project would implement a Construction Waste Management Plan to divert 50 to 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (e.g., Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 57.56 million tons, as well as the remaining 96.46 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

---

[62] *County of Los Angeles Department of Public Works, Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

[63] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Draft Solid Waste Integrated Resources—A Zero Waste Master Plan.*

[64] *City of Los Angeles Mayor's Office, Sustainable City pLAn, 2nd Annual Report, 2016–2017.*

Operation

As discussed in Attachment A, Project Description, of this Initial Study, the Project includes a 403,316 square-foot mixed-use development with 409 residential units, and 7,329 square feet of commercial/retail uses. As shown in Table B-2 on page B-53, upon full buildout under this scenario, the Project would generate approximately 5,326 pounds of solid waste per day. This would result in a projection of approximately 972 tons per year of solid waste.[65] Due to the Project Site's current use as a low-rise parking structure and a surface parking lot, existing waste generation is considered negligible and is not factored into this figure. However, this estimate of solid waste is conservative because the applied waste generation factors do not account for recycling or other waste diversion measures. One such recycling measure includes AB 341, which requires California commercial enterprises and public entities that generate 4 or more cubic yards of waste per week, and multi-family housing complexes with five or more units, to adopt recycling practices. In addition, the estimate does not account for implementation of the City's upcoming Zero Waste LA Franchise System, which establishes a waste and recycling collection program for all City commercial, industrial, and large multi-family customers. This public-private partnership program is expected to begin in July 2017 and will allow for efficient collection and sustainable management of solid waste resources and recyclables. Zero Waste LA sets a goal to reduce citywide landfill disposal by reaching a citywide recycling rate of 90 percent by the year 2025.[66] As discussed below, in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), the Project would also provide a designated recycling area for Project residents to facilitate recycling, which would further reduce the Project's waste stream. The estimated annual net increase in solid waste that would be generated by the Project represents 0.041 percent[67] of the City's annual solid waste disposal and approximately 0.001 percent[68] of the remaining capacity for the County's Class III landfills open to the City.

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

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

---

[65] *5,326 pounds per day × 365 days per year × 1 ton per 2,000 pounds = approximately 972 tons per year.*

[66] *The City will establish an exclusive franchise system with 11 zones with a single franchise waste hauler responsible for each zone. City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste LA Franchise Goals, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf?_adf.ctrl-state=1cahdvybsb_128&_afrLoop=1994603017601690#!, accessed April 17, 2017.*

[67] *972 tons generated by the Project per year × 2.38 million tons disposed by the City = 0.041 percent.*

[68] *972 tons generated by the Project per year × 96.46 million tons of remaining capacity = 0.001 percent.*

Table B-2
Estimated Project Solid Waste Generation

Proposed Land Use	Units	Generation Rate[a]	Total Solid Waste Generated (lbs/day)
Existing (To Be Removed)			
Parking Structure and Lot	34,694 sf	—	—
Proposed			
Residential	409 du	12.23 lbs/du/day	5,002
Commercial[b]	7,329 sf	16.33 lbs/employee/day[d]	324
Total Proposed			*5,326*
Project Net Solid Waste Generation (Proposed – Existing To Be Removed)			**5,326**

du = dwelling unit

sf = square feet

lbs = pounds of solid waste

[a] *CalRecycle, Estimated Solid Waste Generation Rates, www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Service, accessed April 14, 2017. The applied solid waste generation factors are based on the City of Los Angeles CEQA Thresholds Guide, 2006, page M.3-2. Generation rates are not available for parking facilities. Residential solid waste generation factors are not distinguished between condominium units and apartment units.*

[b] *Based on the Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11, the employee generation rate for "Neighborhood Shopping Center" land use (i.e., 0.00271 employee per average square foot) is applied.*

Source: Eyestone Environmental, 2017.

conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order by priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and landfill 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. As discussed above, the City of Los Angeles has also been implementing its RENEW LA plan. In March 2006, the City Council adopted the 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. As supplemented by the Mayor's Sustainable City pLAn, 2nd Annual Report for 2016–2017, this plan has set goals of achieving 90 percent diversion by 2025 and 95 percent diversion by 2035. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. As supplemented by the Mayor's Sustainable City pLAn, 2nd Annual Report for 2016–2017, this plan has set goals of achieving 90 percent diversion by 2025 and 95 percent diversion by 2035. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses

to recycle their organic waste[69] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate 8 cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate 4 cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or room of specified size on the Project Site.[70] In addition, the Project would reuse concrete removed during site clearance to the maximum extent feasible and recycle construction materials in accordance with the City of Los Angeles Green Building Code (Ordinance No. 181,480), which requires a minimum construction waste reduction of approximately 50 percent. The Project would also promote compliance with AB 939, AB 341, and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling, and using building materials with recycled content where applicable. Since the Project would comply with federal, state, and local statutes and regulations related to solid waste, impacts related to solid waste would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

XIX. Mandatory Findings of Significance

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

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. However, as indicated above, the Project does have the potential to result in impacts to cultural resources (i.e., paleontological resources). Therefore, further evaluation of this topic will be required in the EIR.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in

---

[69] *Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.*

[70] *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other development to 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 whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality, cultural resources (i.e., paleontological resources), greenhouse gas emissions, land use and planning, noise, public services (i.e., fire protection, police protection, schools, parks, and other public facilities), recreation, transportation/traffic, tribal cultural resources, and utilities (i.e., water supply, energy).

With regard to cumulative effects for the issues of agricultural and forest resources, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, and utilities (i.e., wastewater, solid waste), the Project would not combine with related projects or other cumulative growth to result in significant cumulative impacts. Specifically, with respect to aesthetics, pursuant to SB 743, 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, and pursuant to SB 743, cumulative impacts associated with aesthetics would be less than significant.

With respect to agricultural and forest resources and mineral resources, the Project would have no impact to these resources and, therefore, could not combine with other projects to result in cumulative impacts. With respect to biological resources, the Project Site is located in an urbanized area and, similar to the Project, other developments occurring in the Project area would occur on previously disturbed land. The Project does not contain these resources and, therefore, could not contribute to a cumulative effect. With respect to hazards and hazardous materials, geology and soils, and hydrology and water quality, these resource areas are generally site-specific and need to be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's standard mitigation practices during construction, which address these topics. Specifically for hydrology and water quality, related projects that disturb more than one acre of soil would also be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 99-08-DWQ) pursuant to NPDES requirements. Impacts with regards to this topic would be limited to the Project Site and not be increased when viewed in conjunction with related projects.

With regard to population and housing, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above, the estimated 998 new residents generated by the Project would represent approximately 0.91 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2017 and

2021, and the 409 new residential units would constitute up to approximately 0.78 percent of the housing growth forecasted between 2017 and 2021. As discussed in the analysis above, the employment, housing and population generated by the Project would be well within SCAG growth forecasts.

With regard to wastewater, similar to the Project, new development projects occurring in the Project vicinity would be required to coordinate with LASAN via a Sewer Capacity Availability Request to determine adequate sewer capacity. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements. Furthermore, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. Therefore, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above, estimated annual increase in solid waste generated by the Project would represent approximately 0.041 percent of the City's annual solid waste disposal and approximately 0.001 percent of the remaining capacity for the County's Class III landfills that are open to the City. Also, forecasts of regional demand are prepared for these services and their ability to meet future demand. Based on the 2015 CoIWMP Annual Report, the County anticipates that future solid waste disposal needs can be adequately met through 2030.

Therefore, cumulative impacts with respect to these topics would be less than significant, and no mitigation measures are required. No further analysis of these topics in the EIR is required.

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

Potentially Significant Impact. As indicated by the analysis above, the Project could result in potentially significant impacts with regard to the following topics: air quality, cultural resources (i.e., paleontological resources), greenhouse gas emissions, land use and planning, noise, public services (i.e., fire protection, police protection, schools, parks, and other public facilities), recreation, transportation/traffic, tribal cultural resources, and utilities (i.e., water supply, energy). As a result, these potential effects will be analyzed further in the EIR.