



# City of Los Angeles

Department of City Planning • Environmental Analysis  
Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



## INITIAL STUDY

### CENTRAL CITY COMMUNITY PLAN AREA

#### 945 W. 8<sup>th</sup> Street Project

Case Number: ENV-2017-2513-EIR

**Project Location:** 945 W. 8<sup>th</sup> Street (Project Site); 951 W. 8<sup>th</sup> Street; 1013 W. 8<sup>th</sup> Street; 959 W. 7<sup>th</sup> Street; 725 S. Figueroa Street; and 777 S. Figueroa Street (Unified Development Site), Los Angeles, CA, 90015

**Council District:** 14

**Project Description:** The 945 W. 8<sup>th</sup> Street Project (e.g., the proposed Project or Project) proposes to develop a mixed-use residential and commercial development on an approximately 1.29-acre (56,220-square-foot) vacant rectangular site (Project Site) within the larger approximately 7.7-acre Unified Development Site. The Unified Development Site includes the entire block bounded by the Harbor Freeway (SR-110) to the west, S. Figueroa Street to the east, W. 7<sup>th</sup> Street to the north, and W. 8<sup>th</sup> Street to the south. No new development is proposed outside of the Project Site, and existing uses within the Unified Development Site would continue to operate as under existing conditions. The mixed-use Project would include up to 791,843 square feet of floor area in a single tower atop an 11-level podium (Podium) with two entirely subterranean levels (below grade relative to W. 8<sup>th</sup> Street), three partially subterranean levels (above grade as viewed from W. 8<sup>th</sup> Street and below grade relative to W. 7<sup>th</sup> Street), and six above-grade levels. The total maximum building height would be 64 stories or approximately 695 feet above grade as viewed from W. 8<sup>th</sup> Street, with residential uses provided on 56 above-grade floors. The Project would include a total of up to 781 residential units and up to approximately 6,700 square feet of commercial retail and/or restaurant uses. Commercial uses would be located at ground level at the Level B1 Plaza level (Level B1 Plaza) adjacent to the existing outdoor plaza immediately to the east. Parking would be provided on-site within the Podium with vehicular access provided from both W. 8<sup>th</sup> Street and from W. 7<sup>th</sup> Street.

**APPLICANT:**

Maguire Properties – 755 S.  
Figueroa, LLC

**PREPARED BY:**

ESA

**ON BEHALF OF:**

The City of Los Angeles  
Department of City Planning  
Environmental Analysis Section

SEPTEMBER 2017



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**CITY OF LOS ANGELES**

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

**CALIFORNIA ENVIRONMENTAL QUALITY ACT****INITIAL STUDY  
AND CHECKLIST**

(Article IV B City CEQA Guidelines)

<b>LEAD CITY AGENCY</b> City of Los Angeles Department of City Planning	<b>COUNCIL DISTRICT</b> 14	<b>DATE</b> 09/28/17
<b>RESPONSIBLE AGENCIES</b> City of Los Angeles Department of City Planning		
<b>PROJECT TITLE/NO.</b> 945 W. 8 <sup>th</sup> Street Project	<b>CASE NO.</b> ENV-2017-2513-EIR	
<b>PREVIOUS ACTIONS CASE NO.</b> N/A	<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions.	

The 945 W. 8<sup>th</sup> Street Project (e.g., the proposed Project or Project) proposes to develop a mixed-use residential and commercial development on an approximately 1.29-acre (56,220-square-foot) vacant rectangular site (Project Site) within the larger approximately 7.7-acre Unified Development Site. The Unified Development Site includes the entire block bounded by the Harbor Freeway (SR-110) to the west, S. Figueroa Street to the east, W. 7<sup>th</sup> Street to the north, and W. 8<sup>th</sup> Street to the south. No new development is proposed outside of the Project Site, and existing uses within the Unified Development Site would continue to operate as under existing conditions. The mixed-use Project would include up to 791,843 square feet of floor area in a single tower atop an 11-level podium (Podium) with two entirely subterranean levels (below grade relative to W. 8<sup>th</sup> Street), three partially subterranean levels (above grade as viewed from W. 8<sup>th</sup> Street and below grade relative to W. 7<sup>th</sup> Street), and six above-grade levels. The total maximum building height would be approximately 695 feet above grade as viewed from W. 8<sup>th</sup> Street. The Project would include a total of up to 781 residential units and up to approximately 6,700 square feet of commercial retail and/or restaurant uses. Commercial uses would be located at ground level at the Level B1 Plaza level (Level B1 Plaza) adjacent to the existing outdoor plaza immediately to the east. Parking would be provided on-site within the Podium with vehicular access provided from both W. 8<sup>th</sup> Street and from W. 7<sup>th</sup> Street.

**ENVIRONMENTAL SETTING:**

The Project Site is currently undeveloped, with the exception of a paved walkway (and associated shade structure) that traverses the property. Other existing on-site improvements includes a retaining wall, ornamental landscaping, and limited stormwater drainage facilities. The on-site pedestrian walkway provides a pedestrian connection between the existing commercial parking structure immediately to the west and the existing FIGat7th shopping center immediately to the east. Other immediately adjacent off-site uses include two office towers, two low-rise retail buildings, and existing outdoor plaza.

**PROJECT LOCATION:**

The Project Site is located at 945 W. 8<sup>th</sup> Street, while the larger Unified Development Site also includes the remainder of the block bounded by SR-110, W. 7<sup>th</sup> Street, S. Figueroa Street, and W. 8th Street, all of which is located within the Financial District and near the Los Angeles Sports and Entertainment District (LASED) and Convention Center within the Central City Community Plan Area in Downtown Los Angeles. As shown in Figure A-1, Regional and Site Location Map, the Unified Development Site is served by a network of regional transportation facilities that provide access to the greater metropolitan area. Regional access to the Unified Development Site is provided by the Pasadena/Harbor Freeway (SR-110), located approximately 200 feet to the west; the Santa Monica Freeway (I-10) located approximately 1.0 mile to the south-southwest; and the Hollywood Freeway (US-101), located approximately 1.1 miles to the north-northeast. These three freeways also provide access to the Golden State/Santa Ana Freeway (I-5), the San Bernardino Freeway (I-10), and the Pomona Freeway (SR-60) to the east of the Downtown area.

The Unified Development Site is located across the street and southwest of the 7<sup>th</sup> Street/Metro Center Station operated by the Los Angeles County Metropolitan Transportation Authority (Metro) which serves the Red Line and Purple Line subway lines, as well as the Blue Line and Expo Line light rail lines.

For further discussion, see Attachment A.

<b>PLANNING DISTRICT</b> Central City Community Plan		<b>STATUS:</b> <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED
<b>EXISTING ZONING</b> C2-4D	<b>MAX. DENSITY ZONING</b> FAR of 6:1 (FAR of 9.5:1 permitted per CRA Variation)	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN  <input type="checkbox"/> DOES NOT CONFORM TO PLAN  <input type="checkbox"/> NO DISTRICT PLAN
<b>PLANNED LAND USE &amp; ZONE</b> C2-4D	<b>MAX. DENSITY PLAN</b> same	
<b>SURROUNDING LAND USES</b> See above Setting Discussion. Also Attachment A, Project Description, for further discussion.	<b>PROJECT DENSITY</b> 8.87:1 FAR (Unified Development Site) 14.06:1 FAR (Project Site)	



**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.

City Planner

SIGNATURE

TITLE

**EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

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

Maguire Properties – 755 S. Figueroa, LLC

**PHONE NUMBER**

(213) 330-8020

**PROPONENT ADDRESS**

601 S. Figueroa Street, Suite 2200, Los Angeles, CA 90017

**AGENCY REQUIRING CHECKLIST**

City Planning Department

**DATE SUBMITTED**

September 28, 2017

**PROPOSAL NAME (If Applicable)**945 W. 8<sup>th</sup> Street Project

 **ENVIRONMENTAL IMPACTS**

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

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

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

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

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**IV. BIOLOGICAL RESOURCES.** Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California of Fish and Game or U.S. Fish and Wildlife Service ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>V. CULTURAL RESOURCES:</b> Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>VI. GEOLOGY AND SOILS.</b> Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**IX. HYDROLOGY AND WATER QUALITY.** Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>X. LAND USE AND PLANNING.</b> Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. MINERAL RESOURCES.</b> Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XII. NOISE.</b> Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XIII. POPULATION AND HOUSING.</b> Would the project:				
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>XVII. TRIBAL CULTURAL RESOURCES.</b> 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:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>XVIII. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

# ATTACHMENT A: PROJECT DESCRIPTION

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## A. INTRODUCTION

The 945 W. 8<sup>th</sup> Street Project (the Project) proposes to develop a mixed-use residential and commercial project on an approximately 1.29-acre (56,220-square-foot) vacant rectangular site (Project Site) within a larger approximately 7.7-acre property (Unified Development Site).<sup>1</sup> The Unified Development Site includes the entire block bounded by the Harbor Freeway (SR-110) to the west, S. Figueroa Street to the east, W. 7<sup>th</sup> Street to the north, and W. 8<sup>th</sup> Street to the south. The Unified Development Site contains the Project Site and an existing 13-story parking structure (commercial parking structure)<sup>2</sup> located immediately west of the Project Site, as well as a number of office, retail, and restaurant uses immediately east of the Project Site, including the FIGat7th retail shopping center (FIGat7th shopping center). The Unified Development Site is located in the west-central portion of the Downtown community of the City of Los Angeles (City), which falls within the Financial District of the Central City Community Plan Area. The Unified Development Site is in a highly urbanized and active area in proximity to LA Live, Staples Center, and the Los Angeles Convention Center. The Project Site is currently undeveloped with the exception of an existing covered pedestrian walkway connecting the existing commercial parking structure and commercial retail and office uses to the east and associated ornamental landscaping.

The proposed Project would include up to 791,843 square feet of floor area in a single tower atop an 11-level below-, at-, and above-grade podium (Podium), with a maximum building height of 64 stories (approximately 695 feet) above grade as viewed from W. 8<sup>th</sup> Street.<sup>3</sup> The Project would include a total of up to 781 residential units and up to approximately 6,700 square feet of commercial retail and/or restaurant uses. Commercial uses would be located at ground level at the Level B1 Plaza level (Level B1 Plaza) adjacent to and connecting with the existing outdoor plaza immediately to the east within the FIGat7th shopping center. Parking would be provided on-site within the Podium with vehicular access provided from both W. 8<sup>th</sup> Street and from W. 7<sup>th</sup> Street.

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<sup>1</sup> *Unified Development is a term used in the Conditional Use Permit entitlement that allows the averaging or the transfer of excess floor area from one or more lots to another lot that meets the definition of a Unified Development. Pursuant to the Los Angeles Municipal Code (LAMC) 12.24 W.19, Floor Area Ratio Averaging and Residential Density Transfer in Unified Developments (Amended by Ord. No. 182,451, Eff. 4/4/13), a Unified Development is a development comprised of a combination of functional linkages, such as pedestrian or vehicular connections; which is in conjunction with common architectural and landscape features, which constitute distinctive design elements of the development; which is composed of two or more contiguous parcels, or lots of record separated only by a street or alley; and when the development is viewed from adjoining streets appears to be a consolidated whole.*

<sup>2</sup> *The existing commercial parking structure includes one at-grade level, nine above-grade levels, and three subterranean levels fronting along W. 8<sup>th</sup> Street.*

<sup>3</sup> *Unless otherwise indicated, Project floor area numbers used throughout this chapter are calculated in accordance with Los Angeles Municipal Code Section 12.03.*

## B. PROJECT LOCATION AND SURROUNDING USES

The Project Site is located at 945 W. 8<sup>th</sup> Street, while the larger Unified Development Site also includes the remainder of the block bounded by SR-110, W. 7<sup>th</sup> Street, S. Figueroa Street, and W. 8<sup>th</sup> Street.<sup>4</sup> The Project Site is located within the Financial District and near the Los Angeles Sports and Entertainment District (LASED) and Convention Center within the Central City Community Plan Area in Downtown Los Angeles. As shown in **Figure A-1**, *Regional and Site Location Map*, the Unified Development Site is served by a network of regional transportation facilities that provide access to the greater metropolitan area. Regional access to the Unified Development Site is provided by the Pasadena/Harbor Freeway (SR-110), located approximately 200 feet to the west; the Santa Monica Freeway (I-10) located approximately 1.0 mile to the south-southwest; and the Hollywood Freeway (US-101), located approximately 1.1 miles to the north-northeast. These three freeways also provide access to the Golden State/Santa Ana Freeway (I-5), the San Bernardino Freeway (I-10), and the Pomona Freeway (SR-60) to the east of the Downtown area.

The Unified Development Site is located across the street and southwest of the 7<sup>th</sup> Street/Metro Center Station operated by the Los Angeles County Metropolitan Transportation Authority (Metro) which serves the Red Line and Purple Line subway lines, as well as the Blue Line and Expo Line light rail lines. The Unified Development Site is also served by multiple bus and shuttle lines, including multiple Metro bus lines and the DASH Downtown Shuttle Route.

The Unified Development Site is located in a regional center which serves as a commercial center for Los Angeles and the surrounding communities, and as an entertainment center of regional importance that is a popular destination for visitors, local workers and area residents. The Project Site vicinity is characterized by a mix of commercial, restaurant, bar, office, entertainment, and residential uses, as indicated in **Figure A-2**, *Aerial Photograph*, below. In addition, **Figure A-3**, *Unified Development Site*, also below, illustrates the Project Site's location within the overall Unified Development Site, as well as those land uses immediately surrounding the Unified Development Site.

As shown in Figures A-2 and A-3, on-site uses surrounding the Project Site include: the adjacent FIGat7th shopping center, Ernst & Young Tower, 777 Tower, and two low-rise retail buildings immediately to the east, the adjacent 13-level commercial parking structure with one at-grade level, 9 above grade levels and 3 subterranean levels immediately to the west, W. 8<sup>th</sup> Street immediately to the south, and W. 7<sup>th</sup> Street immediately to the north. Off-site land uses farther to the east across S. Figueroa Street include commercial retail, restaurant, office, and residential uses as well as surface and structured parking, while uses to the west beyond the Harbor Freeway include mid-rise multi-family residential uses and mid- to high-rise commercial and office uses.

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<sup>4</sup> The Unified Development Site includes the following addresses: 945 W. 8th St.; 925 & 1013 W. 8th St.; 701, 705, 707, 709, 711, 725, 735, 775, & 777 S. Figueroa St.; and 906, 914 & 920 W. 7th Street.

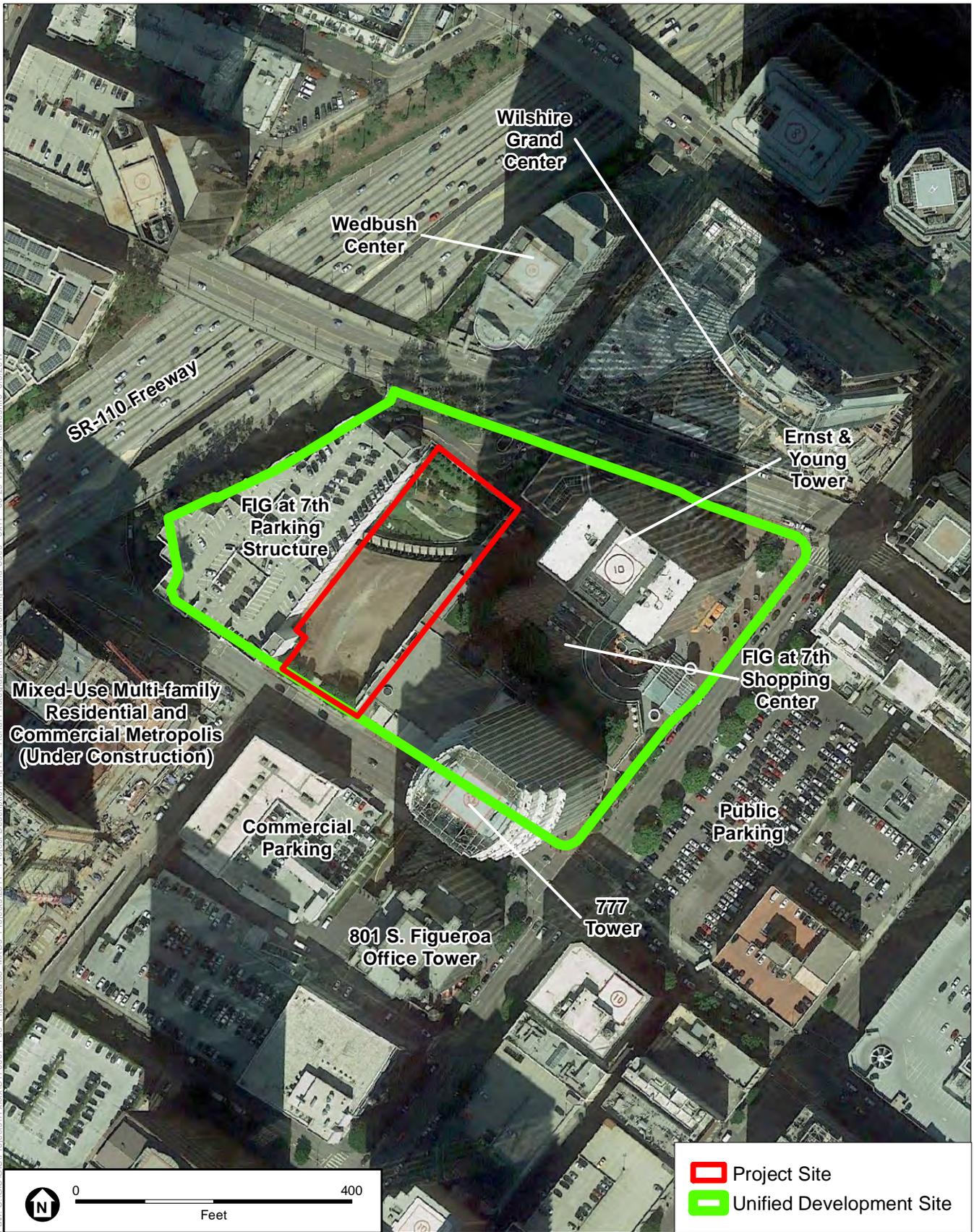


SOURCE: Open Street Map, 2016.

945 W. 8th Street Project

**Figure A-1**  
Regional Location and Vicinity Map





SOURCE: Google Earth, 2016-10-18 (Aerial).

945 W. 8th Street Project

**Figure A-2**  
Aerial Photograph and Surrounding Land Uses



To the north across W. 7<sup>th</sup> Street are commercial office uses in the mid-rise Wedbush Center building as well as commercial retail, office, and luxury hotel uses within the new 1,100-foot-tall Wilshire Grand Center building. Land uses to the south across W. 8<sup>th</sup> Street include commercial office, retail, and restaurant uses within the high rise tower at 801 S. Figueroa Street a multi-level parking structure at the southeast corner of W. 8<sup>th</sup> Street and Francisco Street, and residential, retail, restaurant, and hotel uses within several high-rise structures as part of the new Metropolis development at the southwest corner of W. 8<sup>th</sup> Street and Francisco Street. The Project Site bisects Francisco Street, which forms a “T” intersection at both W. 7<sup>th</sup> Street and W. 8<sup>th</sup> Street on the north and south ends, respectively, of the Project Site.<sup>5</sup>

## C. SITE BACKGROUND AND EXISTING SITE CONDITIONS

### 1. Project Background and Site History

#### a. CRA Owner Participation Agreement, September 30, 1981

The Unified Development Site is designated as “Phase III” of an Owner Participation Agreement (OPA) between the previous Community Redevelopment Agency (CRA) of the City of Los Angeles and Oxford Properties Inc., dated September 30, 1981 for Citicorp Plaza. This is a three-phased development bounded by S. Figueroa Street on the east, W. 7<sup>th</sup> Street on the north, W. 8<sup>th</sup> Street on the south and the I-110 Freeway on the west. The first phase was completed in 1985 consisting of an approximately 900,000 square foot office tower (Ernst & Young Tower), a 350,000 square foot three-level FIGat7th shopping center including two department stores and a 1,500 space parking garage (commercial parking structure).

The second phase, completed in 1992, consisted of an approximately 1,000,000-square-foot office building (777 Tower) and an additional 1,000 parking spaces added to the commercial parking structure. The final phase was intended to consist of a third office building, additional retail space, and parking. Citicorp Plaza received a floor area Variation from the CRA in 1981 (Resolution 1958, dated September 24, 1981) to permit an increase in allowable floor area from 6:1 to 9.5:1 over the entire site and in exchange for the floor area Variation approval, an open space fee of \$5,000,000 was paid to the CRA. The funds were used for the acquisition and development/improvement of Grand Hope Park.

Subsequent Implementation Agreements and amendments to the OPA indicate that the remaining floor area available for Phase III construction on the Unified Development Site (Lots 3, 9 and 10, see Figure A-3 above) is 791,843 square feet. Both the Third Implementation Agreement, Phase III Uses (Page 4, XI. S-110) and the Fourth Implementation Agreement, Phase III Uses (Page 4, VII. S-106) indicate that the CRA/LA recognizes that market conditions continue to dictate that alternative uses to the previously entitled office use, such as residential, be analyzed and considered on a periodic basis. As such, the Third and Fourth Implementation Agreements allow residential uses to be developed on the Unified Development Site (in addition to residential uses also being allowable under the underlying C2-4D zoning designation).

The Project Site is ground Lot 3 with 56,220 square feet of lot area. Lot 10 is an airspace lot located on the top of an existing vacant retail space fronting W. 8<sup>th</sup> Street and adjacent to the east of the Project Site with 17,693

<sup>5</sup> The Project Site does not actually abut W. 7<sup>th</sup> Street; the existing 13-level commercial parking structure’s W. 7<sup>th</sup> Street access driveway currently separates the Project Site and W. 7<sup>th</sup> Street.

square feet of site area, while Lot 9 is an airspace lot located on the top of the adjacent 13-level commercial parking structure to the west of the Project Site with 70,162 square feet of site area.

### **b. Department of City Planning – Zone Variance Approval, May 29, 1984**

A variance from the provisions of the zoning regulations regarding Floor Area Ratio for the entire Citicorp Plaza retail commercial/office complex was granted by the Department of City Planning on May 29, 1984. This zone variance approval allowed for the entire Citicorp Plaza site not to exceed a 9.5:1 floor area ratio and the Phase II and Phase III developments to observe respective floor area ratios of 35:1 and 20:1, in lieu of the 13:1 permitted.

On March 24, 2010, the Department of City Planning issued a determination confirming that the 945 W. 8<sup>th</sup> Street property owner is entitled to the Transfer of Floor Area previously approved by the CRA/LA (i.e., up to 791,843 square feet), in accordance with Resolution 1958 dated September 24, 1981 (Variation from floor area limits).<sup>6</sup>

## **2. Existing Site Conditions**

The Project Site is currently undeveloped, with the exception of a paved walkway (and associated shade structure) that traverses the property and provides a pedestrian connection between the existing commercial parking structure immediately to the west with the existing FIGat7th shopping center immediately to the east. A retaining wall, ornamental landscaping, and limited stormwater drainage facilities also occur on the Project Site.

Existing landscaping within the Project Site is limited to ornamental landscaping including shrubs and other ground cover within slope areas on-site, sixteen (16) Indian Laurel Fig trees (*Ficus microcarpa nitida*) along the Project Site's W. 8<sup>th</sup> Street frontage, four (4) Silver Dollar Eucalyptus trees (*Eucalyptus polyanthemos*), as well as a row of Italian cypress trees along the on-site pedestrian walkway and several other smaller ornamental trees located within the Project Site.<sup>7</sup>

## **D. EXISTING PLANNING AND ZONING**

The Unified Development Site is zoned C2-4D with a land use designation of Regional Center Commercial in the Central City Community Plan. The C2 zone is a general commercial zone, which is consistent with its Regional Center Commercial land use designation. Typical uses in the C2 zone include retail and commercial uses such as office buildings, retail stores, hotels, restaurants and associated parking. The C2 zone also allows for mixed use buildings, such as buildings with residential units over retail and parking. The Unified

<sup>6</sup> Community Redevelopment Agency of the City of Los Angeles. *Citicorp Plaza Fourth Implementation Agreement (Phase III)*. August 19, 2010. Exhibit A: City of Los Angeles Letter Dated March 24, 2010.

<sup>7</sup> Lisa Smith, *The Tree Resource*. *Tree Report Prepared for Brookfield Property Partners 601 S. Figueroa Suite 2200 Los Angeles, California 90017. Property: 755 S. Figueroa St. (945 W. 8th Street) Los Angeles, CA 90017. June 6, 2017. This document is included as Appendix A of this Initial Study.*

Development Site is surrounded by C2-4D zoned properties, which are developed with commercial, residential, and mixed use buildings, as well as parking structures.

The Unified Development Site is located in Height District 4, which permits a floor area ratio (FAR) of up to 13:1, or thirteen times the buildable area of the site; however, the “D” Limitation, enacted by Ordinance 164,307 (Subarea 1930), effective January 30, 1989, limits new development on the site to a total floor area ratio (FAR) of 6:1 (with certain exceptions). The Unified Development Site is not subject to this 6:1 FAR limitation because the Citicorp Plaza development received a floor area Variation from the CRA in 1981 to permit an increase in allowable floor area from 6:1 to 9.5:1, as described above.

It should be noted that the City is currently updating the Central City Community Plan. The Unified Development Site is designated as a Transit Core area in the draft land use designation maps.<sup>8</sup> The maximum FAR in the Transit Core is 13:1. Transit core areas are considered dense centers of activity built around regional transit hubs that provide easy access for pedestrians, transit users, and cyclists to a variety of experiences and activities. The general uses emphasized for the Transit Core are mixed-use, multi-family, residential, entertainment, and office.

## E. PROJECT DESCRIPTION

### 1. Development Summary

The Project would construct a new mixed-use residential and commercial development. Overall proposed uses are summarized in **Table A-1, Proposed Development Program**. As indicated in Table A-1 the Project would include up to 791,843 square feet of floor area (approximately 13:1 FAR) in a single Residential Tower (Residential Tower) that includes the 11-level Podium structure. The Podium would include two completely subterranean levels, three partially subterranean levels (above grade as viewed from W. 8<sup>th</sup> Street and below grade relative to W. 7<sup>th</sup> Street), and six above-grade levels. The Podium would also include commercial uses, active uses, residential uses additional to the parking.

The Residential Tower would be located atop the Podium within the northern portion of the Project Site fronting on W. 7<sup>th</sup> Street. The tower would be 61 stories (approximately 655 feet) above grade as viewed from W. 7<sup>th</sup> Street including the Podium height, or 64 stories (approximately 695 feet) above grade as viewed from W. 8<sup>th</sup> Street. The Project would include a total of up to 781 residential units and up to approximately 6,700 square feet of commercial retail and/or restaurant uses.<sup>9</sup> Commercial uses would be located at ground level relative to the Level B1 Plaza level adjacent to the existing outdoor plaza immediately to the east, which would be incorporated into the Project as common open space. Residential units would be provided within the 51 levels above the Podium, as well as on the outer edge of the Podium along the Project’s W. 7<sup>th</sup> Street frontage.

<sup>8</sup> City of Los Angeles. DTLA 2040 – Plan Concept Map. Located at: <http://www.dtl2040.org/plan-concept-map.html>. Accessed June 27, 2017.

<sup>9</sup> Unless otherwise indicated, Project floor area numbers used throughout this chapter are calculated in accordance with Los Angeles Municipal Code Section 12.03. Commercial floor area includes 5,500 square feet of interior space and 1,200 square feet of outdoor dining space.

The majority of the residential amenities would be provided atop of the Podium (i.e., on Level 7), as well as an approximately 1,000-square-foot upper level community room. Open space within the Unified Development Site's existing outdoor plaza would be available as an amenity for the residential users. Bicycle parking/storage areas would be provided at street level along the Project's W. 8<sup>th</sup> Street (on Level B3) and on Level B1 fronting the on-site outdoor plaza, with pedestrian connections to the Project's W. 7<sup>th</sup> Street frontage. Each of the Project's components is described in greater detail below, and are also illustrated below in **Figure A-4, Overall Site Plan, Figure A-5, Level B3 (8<sup>th</sup> Street), Figure A-6, Level 1 (7<sup>th</sup> Street Lobby Level), Figure A-7, Level B1 (Plaza), and Figure A-8, Level 7 (Residential Amenity Level).**

Table A-1

## Proposed Development Program

<u>Land Use</u>	<u>Space</u>
<b>Residential</b>	
Studio Units	208 units
1-Bedroom Units	371 units
2-Bedroom Units	171 units
3-Bedroom Units	31 units
<i>Total Residential Units</i>	<i>781 units</i>
<i>Residential Unit Floor Area</i>	<i>774,843 sf</i>
<b><u>Residential Amenities</u></b>	
<i>Total Residential Amenities</i>	<i>10,300 sf</i>
<b>Total Residential Floor Area</b>	<b>785,143 sf</b>
<b>Commercial</b>	
Retail/Restaurant	6,700 sf
<b>Total Commercial Floor Area</b>	<b>6,700 sf</b>
<b>Total Building Floor Area</b>	<b>791,843 sf</b>
<b>Open Space</b>	
Common Open Space	66,800 sf
Residential Recreation Space	10,300 sf
Residential Private Open Space	7,600 sf
<b>Total Open Space Area</b>	<b>84,700 sf</b>

Notes: sf = square feet

Source: ESA PCR and Marmol Radziner, 2017

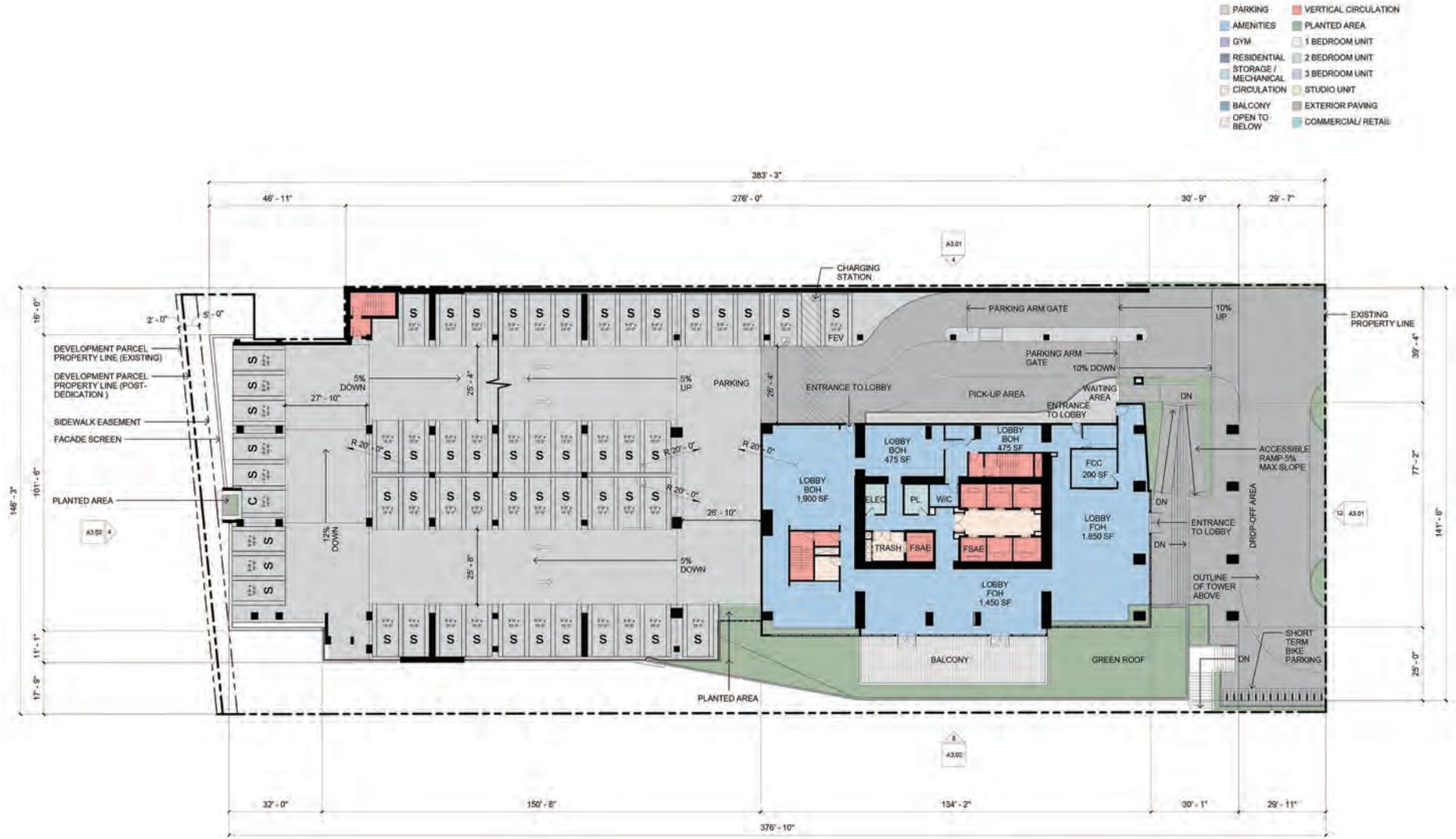


SOURCE: Marmol Radziner, 2017

945 W. 8th Street Project

**Figure A-4**  
Overall Site Plan



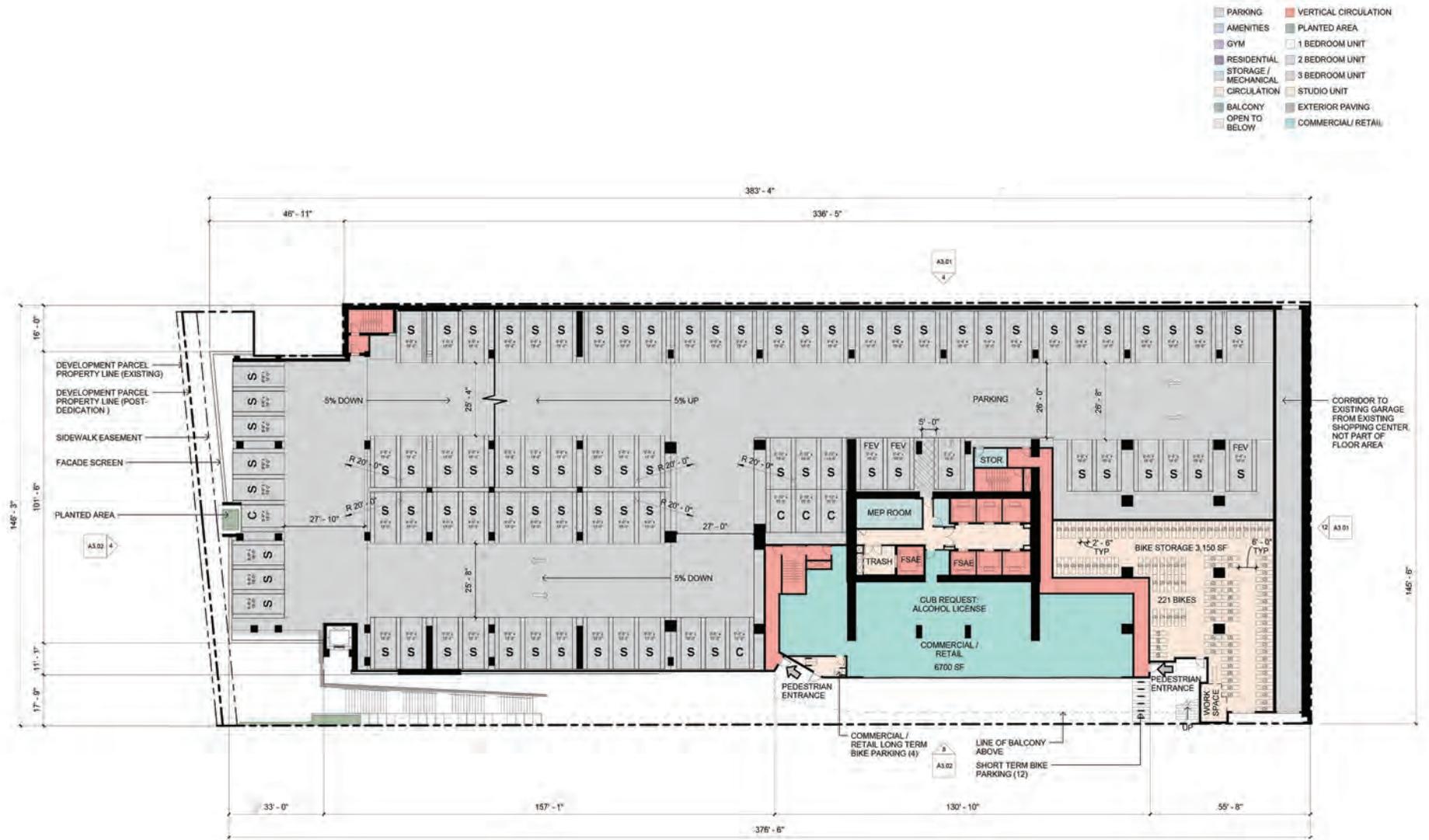


SOURCE: Marmol Radziner, 2017

945 W. 8th Street Project

**Figure A-6**  
Level 1 (7th Street Lobby Level)





SOURCE: Marmol Radziner, 2017

945 W. 8th Street Project

**Figure A-7**  
Level B1 (Plaza)





SOURCE: Marmol Radziner, 2017

945 W. 8th Street Project

**Figure A-8**

Level 7 (Residential Amenity Level)



### **a. Residential Uses and Amenities**

The Residential Tower would include up to 781 residential units consisting of studios, one-bedroom units, two-bedroom units, and three-bedroom units. Amenities associated with the residential uses include: ground level open space along the Project's W. 7<sup>th</sup> Street and W. 8<sup>th</sup> Street frontages; the existing outdoor plaza above the FIGat7th shopping center; the Residential Amenity Level on Level 7 (including a pool deck, fitness center, and indoor and outdoor recreational space and common area facilities); as well as a community room for residents on an upper level of the Residential Tower (Upper Amenity Level).

### **b. Podium**

The proposed Podium would support development of the Residential Tower and associated commercial uses and parking. The Podium would include up to 6,700 square feet of commercial uses located on Level B1 fronting the existing outdoor plaza to the east, and would also include vehicle and bicycle parking. Vehicular parking would be provided within two entirely subterranean levels relative to W. 8<sup>th</sup> Street, three partially subterranean levels (above grade as viewed from W. 8<sup>th</sup> Street and below grade relative to W. 7<sup>th</sup> Street), and six above-grade partial parking levels.<sup>10</sup> Bicycle parking for both commercial and residential uses would be provided at street level along the Project's W. 8<sup>th</sup> Street (on Level B3) and on Level B1 fronting the on-site outdoor plaza, with pedestrian connections to the Project's W. 7<sup>th</sup> Street frontage. As discussed above, the Residential Amenity Level top would be located on the Podium Level 7. The above-grade Podium levels would be screened using architectural screening, vegetation, or other design features along W. 8<sup>th</sup> Street and would be wrapped with residential units along the Project's W. 7<sup>th</sup> Street frontage.

## **2. Project Design and Architecture**

The Project would incorporate contemporary architecture compatible with the surrounding downtown urban environment. The Project's site plan is focused on integration with the adjacent streetscape and existing public plaza, with an emphasis on its connection to the neighborhood and pedestrians. The Project's Residential Tower is positioned to activate the existing outdoor plaza to the east of the Unified Development Site and incorporate it into the Project as public open space with direct at-grade connections and commercial frontage along the Project's Level B1 Plaza level. The commercial component would be located at the base of the Residential Tower lining the western end of the outdoor plaza and the Residential Tower rising to provide a visual edge to the plaza. The Residential Tower would be positioned to optimize the space between the adjacent towers as well as solar access to both the Residential Tower and the plaza. The Residential Amenity Level including a swimming pool and landscaped and hardscaped areas at the top of the Podium would be oriented to capture sunlight and would overlook the outdoor plaza.

To facilitate pedestrian access and connectivity through the block and around the neighborhood, a new pedestrian connection is proposed. This would include a small pedestrian plaza on W. 8<sup>th</sup> Street as well as a pedestrian stairway connection from W. 8<sup>th</sup> Street up to the existing outdoor plaza. The pedestrian walkways would provide direct access to both W. 7<sup>th</sup> Street and S. Figueroa Street, continuing northward through the Project Site to W. 7<sup>th</sup> Street. This approach is consistent with the "Avenue of the Angels" concept of connecting

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<sup>10</sup> Per Los Angeles Municipal Code (LAMC) Section 12.21.A.4.(i).(3), no vehicular parking is required for commercial spaces of 7,500 square feet or less. However, bicycle parking for commercial uses is still required per LAMC Section 12.21A.16 and Ordinance No. 182,386 even if less than 7,500 square feet in floor area.

LA Live to the Financial District through a walkable pedestrian route. This new connection would enable pedestrian circulation from W. 8<sup>th</sup> Street up to the plaza level, thereby providing connectivity to transit, retail, and community destinations to the north and east including the Metro station located at W. 7<sup>th</sup> Street and S. Figueroa Street, the FIGat7th shopping center, and the new Wilshire Grand tower.

The Residential Tower would incorporate balconies and operable windows to create a visual texture within the building façade. The tower would be designed with colors and materials that are compatible with surrounding urban development and would include a mix of low reflectivity glass and solid materials.

Building cross-sections and elevations of the Project are provided in **Figure A-9**, *Building Cross-Sections*, while conceptual renderings of the Project are shown in **Figure A-10**, *Conceptual Rendering #1*, and **Figure A-11**, *Conceptual Rendering #2*, below.

### **3. Open Space and Landscaping**

#### **a. Open Space**

The Project includes 84,700 square feet of open space, which consists of outdoor plaza areas, terraces, a pool deck, gym, community rooms and private residential balcony areas. The proposed open space for the Project is shown in **Table A-2**, *Open Space Summary*.

The Project would provide public and private open space in accordance with City of Los Angeles open space requirements. A portion of the common open space would be provided by the existing outdoor plaza, which is a shared space with the on-site FIGat7th shopping center, on-site office towers, and the general public. This plaza is directly adjacent to the proposed pedestrian walkway along the easterly property line of the proposed Project, as well as the commercial space that is intended as a restaurant/retail use with potential for outdoor dining that may flow out to the Level B1 plaza area to activate the public outdoor space.





D170007.00

SOURCE: Marmol Radziner, 2017

945 W. 8th Street Project

**Figure A-10**  
Conceptual Rendering #1



D1770007.00

SOURCE: Marmol Radziner, 2017

945 W. 8th Street Project

**Figure A-11**  
Conceptual Rendering #2



Table A-2

## Open Space Summary

**Residential Uses**

As Per LAMC Section 21.21 G - Applicable To New Construction Of 6 Units Or More

< 3 Habitable Rooms (100 Sf/Unit X 579 Units)	57,900	
= 3 Habitable Rooms (125 Sf/Unit X 171 Units)	21,375	
> 3 Habitable Rooms (175 Sf/Unit X 31 Units)	5,425	
<b>Total Open Space Required</b>	<b>84,700</b>	<b>SF</b>

**Common Open Space (Exterior)**

Ground Floor - 8 <sup>th</sup> Street Plaza	1,050	
Level B1 - Outdoor Plaza/Existing Plaza	39,100	
Level 1 - Lobby Balcony/Roof Terrace	3,200	
Level 7 - Residential Amenity Level	23,450	
<b>Subtotal</b>	<b>66,800</b>	<b>SF</b>

**Common Open Space (Interior)**

LAMC Section 12.21.G.2(A)(4)(I) - Recreation rooms at least 600 SF in area shall qualify towards common open space - but not more than 25% of total required usable open space (84,700 x 25% = 21,175 SF)

Level 7 - Fitness Center And Community Rooms	9,300	
-Upper Level Community Room	1,000	
<b>Subtotal</b>	<b>10,300</b>	<b>SF</b>
<b>Total Common Open Space Proposed</b>	<b>77,100</b>	<b>SF</b>

**Private Open Space**

152 Residential Units X 50 Sf	7,600	SF
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<b>Total Open Space Proposed</b>	<b>84,700</b>	<b>SF</b>
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Source: Marmol Radziner and Craig Lawson & Co., LLC, 2017

**b. Landscaping**

Street fronts along the Project Site and the Unified Development Site would include wide sidewalks with street trees within tree wells, special paving, rows of trees, and landscaped areas with groundcover, shrubs, vines and large planters. Proposed trees would be provided on-site at a ratio of one tree per four residential units, for a total of 196 trees, with 89 trees provided within the Project Site and another 107 trees outside the Project Site but within the boundaries of the Unified Development Site. Landscaping would comply with City of Los Angeles Urban Forestry requirements, and would incorporate sustainable landscape design with native and drought tolerant vegetation, and use of water efficient irrigation systems. Street front edges would include landscaping and paving treatments as well as possible outdoor seating areas, and architectural lighting. These elements would promote pedestrian activities and connections to interior uses.

Along W. 7<sup>th</sup> Street, in the motor court/valet drop-off area, a combination of landscape and hardscape treatments would create a clear arrival point for residents, residential guests, commercial patrons, and other

pedestrians. The Residential Amenity Level (Level 7) would feature a swimming pool, a covered terrace and other shaded seating areas, open areas for recreational activities, and numerous planters and landscaping. The Podium Garden Terrace would be finished with concrete pavers, turf, shrubs, shade trees, and other landscaping.

## **4. Access, Circulation, and Parking**

### **a. Vehicular Access and Circulation**

Vehicular access into the Podium would be from both W. 8<sup>th</sup> Street and W. 7<sup>th</sup> Street. A secondary two-lane driveway (one lane for ingress and one lane for egress), as well as a motor court/valet drop-off area in front of the Project's residential lobby, would be provided at the Project's W. 7<sup>th</sup> Street frontage. The proposed driveway lanes at the Project's W. 7<sup>th</sup> Street frontage would align with and connect to the existing driveway on W. 7<sup>th</sup> Street at Francisco Street. As such, new street curb cuts along W. 7<sup>th</sup> Street would not be necessary to serve the Project.

As noted above, loading for service vehicles related to both residential and commercial uses would be on the ground level (Level B3) via the Project's W. 8<sup>th</sup> Street driveway, and would be located entirely within the interior of the Podium.

### **b. Pedestrian Access**

Primary pedestrian access to the residential lobby on Level 1 would be provided directly from the street-level motor court/valet drop-off area fronting W. 7<sup>th</sup> Street. Secondary pedestrian access would be provided from W. 8<sup>th</sup> Street via the proposed pedestrian stairway or elevator up to the existing outdoor plaza on Level B1, which provides access to the residential lobby on W. 7<sup>th</sup> Street. Pedestrian access to commercial uses at the Plaza level (Level B1) would be provided directly from the adjacent outdoor plaza, which would be accessible from W. 7<sup>th</sup> Street via a proposed stairway from the Project's vehicle drop-off area or from W. 8<sup>th</sup> Street via the proposed pedestrian stairway discussed previously.

The existing covered pedestrian walkway currently traversing the northerly portion of the Unified Development Site would be demolished and a new below-grade walkway would be constructed. An alternate walkway connection would be provided during construction activities until the below-grade pedestrian walkway is completed. In addition, a pedestrian connection between the existing commercial parking structure west of the Project Site and the existing Ernst & Young Tower to the east of the Project Site would be provided by the existing sidewalk on the north side of the Project Site, closest to W. 7<sup>th</sup> Street. Access to this sidewalk or an alternate walkway would be maintained throughout construction activities.

### **c. Vehicle and Bicycle Parking**

#### **(1) Vehicle Parking**

The Project proposes to provide parking for the residential units at the ratios required by the Central City Parking Exception (LAMC Section 12.21-A.4(p)). The Project proposes to provide a total of approximately 831 residential parking stalls (1.064 parking spaces per unit). Parking for residential condominium projects are subject to the Deputy Advisory Agency (DAA)'s Residential Parking Policy No. AA 2000-1, requiring 2 parking

spaces per unit plus 0.25 guest parking spaces per unit; however, the Project is requesting a waiver from the DAA Residential Parking Policy of 2.25 spaces per unit and instead proposes to provide a ratio of 1.064 parking spaces per unit, consistent with the LAMC residential parking requirement. The Project also proposes, as required by California Green Building Standards Code (CalGreen Code), that 20 percent of the total required parking spaces would be provided with conduit and panel capacity to accommodate future Electric Vehicle Charging stations, with five percent of the total parking spaces provided with operational Electric Vehicle Charging stations.

As per the Downtown Parking Exception District (LAMC Section 12.21.A.4.(i)(3)), no parking spaces are required for the retail/restaurant uses of the Project as the total commercial square footage is less than 7,500 square feet.

## **(2) Bicycle Parking**

Bicycle parking would include 867 bicycle parking spaces (859 residential/8 commercial), including 82 short-term spaces and 785 long-term spaces, in accordance with LAMC Section 12.21.A.16.

## **5. Lighting and Signage**

The Project would provide lighting and signage for the proposed development in accordance with LAMC requirements. Lighting associated with the Project would include building identification signage, architectural accent lighting, wayfinding, lighting for common open space areas, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security.

The building signage would include on-site directional and way-finding signage, building identification signage, retail and restaurant tenant signage, and other similar signs. The types of signs may include high-rise building branding signage located on the upper levels of the tower, street-level marquees at building lobby areas, parking and pedestrian wayfinding signage along key street front and outdoor plaza exposures, and individual signs (e.g., blade signage, leasing/available space signage, etc.) above commercial tenant spaces. The graphics and signage program would support an active street front experience on both the W. 7<sup>th</sup> Street and W. 8<sup>th</sup> Street sides of the Unified Development Site.

## **6. Site Security**

The Project would provide an extensive security program to ensure the safety of residents, employees, patrons, and visitors to the Unified Development Site. The Project would incorporate Crime Prevention Through Environmental Design (CPTED) strategies in design and planning, as well as active security features. In the Residential Tower and in the Podium areas, security technology would be employed, including comprehensive coverage and monitoring of key areas through Close Circuit Television systems (CCTV). Access to non-public areas of the Project would be restricted by electronically controlled and locking access cards. Security would be provided including security/concierge desks in the Residential Tower. Security personnel duties would include but not be limited to assisting residents and visitors with parking and building access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. Initial alarms such as intruder alarms or duress alarms would be the responsibility of site security personnel as first responders. Access to parking areas would be secured and would include CCTV.

## 7. Sustainability Features

The Project would comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2013 California Green Building Standard Code, or CALGreen, which was developed and mandated by the State to attain consistency among the various jurisdictions within the State, reduce the building's energy and water use, reduce waste, and reduce the carbon footprint. A sustainability program would be prepared and monitored by an accredited design consultant. The consultant would provide guidance on Project design, construction and operations and would monitor Project operations to reconcile design and energy performance and enhance energy savings. Some of the Project's key design features that contribute to energy efficiency include: the installation of energy efficient appliances, water efficient irrigation systems, water efficient indoor fixtures, and the installation of the conduit and panel capacity to accommodate future Electric Vehicle Charging stations into 20 percent of the parking spaces, and provision of operational Electric Vehicle Charging stations at five percent of the parking spaces. The Project would also: (1) support pedestrian activity in the downtown Los Angeles area; (2) contribute to a land use pattern that addresses housing needs and reduces vehicle trips and air pollution by locating residential uses close to transit, employment opportunities, restaurants and entertainment; and (3) encourage the use of alternative modes of transportation by providing on-site bicycle parking.

Lastly, Section 21100(b) of the State CEQA Guidelines requires that an EIR include a detailed statement setting forth mitigation measures proposed to minimize a project's significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the State CEQA Guidelines states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Consistent with these requirements, the EIR to be prepared for the Project will include, but not be limited to, an analysis of Project consistency with applicable energy conservation requirements (e.g., Title 24 of the CBC, CALGreen, SCAG RTP requirements for promoting regional land use patterns that promote sustainability, City transportation demand management requirements, etc.), including identification of attributes of the Project and the energy conservation features proposed to ensure consistency with these requirements.

## 8. Construction Schedule and Phasing

The Project would be constructed in a single phase, which is expected to commence in the first quarter of 2019 with the last stage completed by 2023. Construction activities would generally be limited to the Unified Development Site, with staging of construction equipment, materials, and supplies occurring within the Project Site and adjacent portions of the existing outdoor plaza. Construction worker parking would be provided in the existing commercial parking structure or in nearby parking lots or parking structures. Grading and earthwork activities for the Project would require the export of up to approximately 227,500 cubic yards of soil material, which would be transported off-site to an inert waste disposal site located in Irwindale, California.

## F. ANTICIPATED PROJECT APPROVALS

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

- Certification of an Environmental Impact Report;
- Vesting Tentative Tract Map (VTT-75003) pursuant to LAMC Section 17.05 for the following:
  - An airspace subdivision with one (1) ground lot and three (3) airspace lots for a mixed-use development located at 945 W. 8th Street containing 781 residential condominium units, 6,700 square feet of commercial floor area and three (3) commercial condominium units.
  - A Waiver of the Deputy Advisory Agency's Parking Policy AA 2000-1 to allow a residential parking ratio of 1.064 spaces per dwelling unit (in accordance with the Central City Area Parking Exception for dwelling units) in lieu of two residential parking spaces and .25 guest parking spaces per dwelling unit.
  - Approval of proposed haul route concurrent with the Vesting Tentative Tract Map.
- Conditional Use Permit for Floor Area Averaging in Unified Developments pursuant to LAMC Section 12.24.W.19. to:
  - Allow floor area averaging to permit the construction, use and maintenance of an approximately 64-story mixed-use development containing approximately 791,843 square feet;
  - Allow required Common Open Space and required trees to be located on an adjacent lot within the Unified Development; and
  - Pursuant to Section 12.24 F, a modification of the area regulations to allow the required passageway to be located on an adjacent lot within the Unified Development.
- Conditional Use Permit (Alcohol) pursuant to LAMC Section 12.24.W.1 for the on-site sale and dispensing of a full line of alcoholic beverages in conjunction with a proposed 6,700 square-foot restaurant;
- Site Plan Review pursuant to LAMC Section 16.05;
- Termination of the CRA/LA Participation Agreement;
- Pursuant to various sections of the Los Angeles Municipal Code, the Project would request approvals and permits from the Building and Safety Department (and other municipal agencies) for construction actions including, but not limited to the following: demolition, excavation, shoring, grading, haul route, foundation and building; and
- Other approvals as needed and as may be required.

## ATTACHMENT B: EXPLANATION OF CHECKLIST DETERMINATIONS

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

### I. AESTHETICS

*Senate Bill (SB) 743, effective January 1, 2014, deems the aesthetic impacts of residential infill projects located in defined transit priority project areas as less than significant under CEQA. Zoning Information File (ZI) No. 2452 issued by the City of Los Angeles Department of City Planning, as well as the Department of City Planning, Great Streets Initiative Program Interactive Map shows that the Project Site is located in a Transit Priority Area (TPA).<sup>1,2</sup> Therefore, all aesthetic impacts, including but not limited to (a) adverse effects on scenic vistas, (b) damage to scenic resources, (c) degradation of existing visual character, (d) light and/or glare, and/or shade shadow are deemed less than significant. Notwithstanding the mandate imposed by SB 743, the following aesthetic analysis of the Project is provided for informational purposes only and not for determining whether the Project would 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.** The Unified Development Site is located within the Financial District of the highly urbanized downtown area of Los Angeles and in relative proximity to (i.e., approximately two blocks north of) the Los Angeles Sports and Entertainment District (LASED), an active regional entertainment/mixed-use district. Visual resources of merit in the Project vicinity include the high-rise skyline and urban corridors of downtown Los Angeles and the entertainment-related features of nearby development such as LA LIVE (e.g., pedestrian plazas, signage) of the LASED. No designated City historical resources or other historical buildings are located in the immediate Project vicinity. The Project would result in the development of the currently vacant Project Site with a mixed-use development consisting of a single residential tower atop an 11-story Podium structure containing parking and limited commercial uses. The proposed 64-story Residential Tower would rise to a height of approximately 695 feet above grade (as viewed from W. 8<sup>th</sup> Street, or 61 stories/655 feet above grade as viewed from W. 7<sup>th</sup> Street), contributing to the downtown Los Angeles urban skyline.

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<sup>1</sup> Los Angeles Department of City Planning, Great Streets Program Interactive Map, Transit Priority Area Layer, <https://ladcp.maps.arcgis.com/apps/webappviewer/index.html?id=02d509dfe1ea458da1157b516249f4d9>. Accessed May, 17, 2017.

<sup>2</sup> City of Los Angeles, ZI 2452, “Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA,” <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>. Accessed May, 17, 2017.

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

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

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

**No Impact.** The Unified Development Site, including the Project Site, is not located along a designated City- or State-designated scenic highway or associated view corridor.<sup>3</sup> However, the downtown Los Angeles skyline is comprised of numerous City-designated historical resources, which could potentially be indirectly affected by implementation of the Project. The introduction of the new Residential Tower structure may affect historic resources in the downtown Los Angeles area.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact on resources within a state scenic highway.

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

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

**No Impact.** The Project would result in the construction of a mixed-use development on the currently undeveloped Project Site. The proposed Residential Tower would rise to a height of up to 695 feet above grade as viewed from W. 8<sup>th</sup> Street (or 655 feet above grade as viewed from W. 7<sup>th</sup> Street due to topography of the site). The Project would encompass approximately 791,843 square feet of floor area, comprised of residential and limited commercial uses. The Project would alter the visual character of the Unified Development Site and its surroundings by increasing the height and density of on-site development.

Pursuant to SB 743 and ZI 2452, the Project would result in no impact on resources within a state scenic highway.

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

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

**No Impact.** The Unified Development Site lies within the highly urbanized downtown area of Los Angeles and approximately two blocks north of the LASED, an active regional entertainment and mixed-use district. At night, the surrounding development generates moderate to high levels of interior and exterior lighting related

<sup>3</sup> *City of Los Angeles General Plan Transportation Element, Map E: Scenic Highways In the City of Los Angeles. June 1998.*

to special event, security, parking, architectural and landscaping/decorative lighting. Static and animated illuminated signage, street lights, and traffic on local streets and the Harbor Freeway also contribute to the ambient light levels in the area. The Project would contribute to ambient nighttime illumination as the Project's new architectural lighting, security lighting, ground-level commercial uses, lobby entrance(s), and illuminated signage are expected to incrementally increase light levels over existing conditions on the currently undeveloped Project Site. Some lighting elements would be visible from nearby off-site vantages, including nearby residential uses southwest of the Unified Development Site. In addition, the Project would introduce new building surface materials to the Unified Development Site with the potential to generate additional sources of glare.

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

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

Shading impacts are influenced by the height and bulk of a structure, time of year, duration of shading during the day, and the proximity of shade-sensitive land uses, or receptors (e.g., residential and outdoor activity areas). The immediate Project vicinity is characterized by office uses with ground-floor commercial to the north (across W 7<sup>th</sup> Street), surface parking uses to the south (across W 8<sup>th</sup> Street), office with ground-floor commercial and outdoor activity area to the east, and a parking structure to the west.

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

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

## II. AGRICULTURE AND FORESTRY RESOURCES

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

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

**No Impact.** The Unified Development Site, including the Project Site, is located in Downtown Los Angeles, and thus has been developed with multiple urban uses since the late 1800s.<sup>4</sup> The Unified Development Site,

<sup>4</sup> *Certified Environments, Inc. Phase I Environmental Site Assessment – 755 South Figueroa Street Los Angeles, CA 90017 CEI#: 376-001-0317. May 2017. This document is included as Appendix A of this Initial Study.*

including the Project Site, is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) parcels as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.<sup>5</sup> Since the Project would not convert farmland to non-agricultural uses, there would be no impact and mitigation measures are not necessary. No further analysis of this topic in an EIR is necessary.

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

**No Impact.** The Unified Development Parcel, including the Project Site, is zoned C2-4D with a land use designation of Regional Center Commercial in the Central City Community Plan. The Unified Development Site and nearby lands are not enrolled under the Williamson Act. As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract. The Project would have no impact, and no mitigation measures are required. No further analysis of this topic in and EIR is necessary.

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

**No Impact.** As discussed in Checklist Question II(b), the Unified Development Site is zoned C2-4D. No forest land or land zoned for timberland production is present on the Unified Development Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland. The project would have no impact and no mitigation measures are required. No further analysis of this topic in an EIR is necessary, and no mitigation measures are required.

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

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

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

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

<sup>5</sup> California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program Los Angeles County Important Farmland 2012. Available at: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf> Accessed December 21, 2015.

### III. AIR QUALITY

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

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

**Potentially Significant Impact.** The Unified Development Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) together with the Southern California Association of Governments (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current 2012 Air Quality Management Plan (AQMP) was adopted December 7, 2012 and outlines the air pollution control measures needed to meet Federal particulate matter (PM<sub>2.5</sub>) standards by 2015 and ozone (O<sub>3</sub>) standards by 2024. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve Federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several Federal planning requirements and incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from that included in earlier AQMPs.

While the 2012 AQMP is currently in force, a comprehensive update to the AQMP (2016 AQMP) was adopted by the SCAQMD on March 3, 2017, which represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. Five NAAQS are being evaluated in the integrated AQMP. Three standards – the 8-hour ozone NAAQS established in 2008 (2008 8-hour Ozone), the annual PM<sub>2.5</sub> NAAQS established in 2012 (2012 annual PM<sub>2.5</sub>), and the 24-hour PM<sub>2.5</sub> NAAQS established in 2006 (2006 24-hour PM<sub>2.5</sub>) are required to have new attainment demonstration in the 2016 AQMP. However, given the overlaps in emissions and control strategies for other yet-to-be-attained NAAQS, the integrated AQMP also includes revisions to the attainment demonstrations for two other standards: the 1997 8-hour ozone NAAQS and the 1979 1-hour ozone NAAQS. While the 2012 AQMP focused on attainment of the 2006 24-hour PM<sub>2.5</sub> standard, it has since been determined, primarily due to unexpected drought conditions, that it was impracticable to meet the standard by the original attainment year. Since that time, U.S. Environmental Protection Agency (U.S. EPA) has approved a re-classification to “serious” nonattainment for the 24-hour PM<sub>2.5</sub> standard from “moderate” nonattainment, which requires a new attainment demonstration with a new attainment deadline. Upon approval of the U.S. EPA, the 2016 AQMP will supersede the 2012 AQMP as the in-force AQMP for the Basin.

The Project would support and be consistent with several key policy directives set forth in the AQMP. For example, the Project would provide for new residential and limited commercial uses in proximity to commercial and entertainment activities as well as a range of employment opportunities, locate new development in proximity to existing public transit facilities including various bus stops and rail facilities, and would redevelop the Project Site already served by existing infrastructure. Notwithstanding these attributes, the Project has the potential to increase the amount of traffic in the area which would consequently generate operational air emissions that could affect implementation of the AQMP. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, it is recommended that this topic be analyzed further in an EIR.

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

**Potentially Significant Impact.** The Unified Development Site is located within the Basin, which is characterized by relatively poor air quality. State and Federal air quality standards are often exceeded in many parts of the Basin, with Los Angeles County among the highest of the counties that comprise the Basin in terms of non-attainment of the standards. The Basin is currently in non-attainment with National Ambient Air Quality Standards (NAAQS) for O<sub>3</sub> and particulate matter less than 2.5 microns (PM<sub>2.5</sub>), and is currently in non-attainment with California Ambient Air Quality Standards for O<sub>3</sub>, particulate matter less than 10 microns (PM<sub>10</sub>), and PM<sub>2.5</sub>. The Basin (Los Angeles portion) is currently also in partial non-attainment with NAAQS for lead (near-source monitoring). The Project would result in increased air emissions associated with construction and operational traffic. Therefore, it is recommended that this topic be analyzed further in an EIR.

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

**Potentially Significant Impact.** As discussed in Checklist Question III(b), the Project would result in increased air emissions from construction and operational traffic in the Basin, an air quality management area currently in non-attainment of Federal and/or State air quality standards for O<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead. As such, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact when combined with other existing and future emission sources in the project area. Therefore, it is recommended that this topic be analyzed further in an EIR.

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

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

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

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

## IV. BIOLOGICAL RESOURCES

*Would the project:*

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

**No Impact.** The Project Site is located in Downtown Los Angeles, a highly urbanized area. While the Project Site is currently undeveloped, with the exception of a paved walkway and associated shade structure, the site is highly disturbed, is surrounded on all sides by urban development, and contains only non-native ornamental landscaping (e.g., 16 Indian Fig trees, four Silver Dollar Eucalyptus trees, a row of Italian cypress trees, and some shrubs and ground cover).<sup>6</sup> Additionally, the Project Site does not contain any watercourses, riparian habitat, other sensitive natural community, or structures that could host candidate, sensitive or special status species. Therefore, no impacts to candidate, sensitive, or special status species would occur. No further analysis of this topic in an EIR is recommended, and no mitigation measures are required.

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

**No Impact.** As discussed in Checklist Question IV(a), the Unified Development Site and surrounding area are located in the highly urbanized downtown area. The Unified Development Site does not contain any riparian habitat or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife or US Fish and Wildlife Service. Furthermore, the Unified Development Site is not located in or adjacent to a Significant Ecological Area as defined by the City of Los Angeles.<sup>7</sup> Therefore, the Project would not have an adverse effect on any riparian habitat or other sensitive natural community and mitigation measures are not required. No further analysis of this topic is necessary in an EIR.

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

**No Impact.** As discussed in Checklist Question IV(a), the Unified Development Site is located in the highly urbanized downtown area and is currently developed and/or heavily disturbed. The surrounding area is fully developed with urban uses, associated infrastructure, and surface parking areas. The Unified Development Site does not contain wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would

<sup>6</sup> Lisa Smith, *The Tree Resource. Tree Report Prepared for Brookfield Property Partners 601 S. Figueroa Suite 2200 Los Angeles, California 90017. Property: 755 S. Figueroa St. (945 W. 8th Street) Los Angeles, CA 90017. June 6, 2017. This document is included as Appendix B of this Initial Study.*

<sup>7</sup> *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, at page 2.18-1 through 2.18-13; <http://cityplanning.lacity.org/housinginitiatives/housingelement/framework/FrameWorkFEIR.pdf>*

not have an adverse effect on federally protected wetlands and mitigation measures are not necessary. No further analysis of this topic in an EIR is necessary.

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

**Less Than Significant With Mitigation Incorporated.** As stated in Checklist Question IV(a), the relatively undeveloped Project Site is highly disturbed, surrounding and all sides by urban development, and contains some ornamental non-native trees, shrubs and ground cover. Due to the highly disturbed and urbanized nature of the Unified Development Site and surrounding area, the lack of a major water body, as well as the limited number of ornamental trees on the Project Site, most of which are not mature, the Unified Development Site does not contain substantial habitat for native resident or migratory species, or native wildlife nursery sites. The Project Site does not serve as a wildlife corridor and would not impede the use of native wildlife nursery, as the site does not support any habitat (e.g., water bodies, wetlands, riparian habitat, native trees, etc.) that could accommodate special status species. Nonetheless, the Project Site contains 20 ornamental trees that could be used by nesting birds protected under the Migratory Bird Treaty Act (MBTA). Project construction would include tree removal and construction activities within close proximity of existing trees to be retained. As such, in order to preclude impacts to nesting birds resulting from Project implementation, Mitigation Measure IV-1 shall be required. The mitigation measure would require that nesting birds surveys be conducted during the nesting/breeding season. With implementation of mitigation measure IV-1, the Project would not interfere with the movement of any native resident or migratory fish or wildlife species, impede established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and Project impacts would be less than significant with mitigation incorporated. No further analysis of this topic in an EIR is necessary.

**Mitigation Measure IV-1:** To avoid impacts to nesting birds during construction, a qualified biologist approved by the Los Angeles Department of City Planning shall conduct nesting bird surveys on the Project Site if construction activities would take place during the bird nesting/breeding season, January through March for early nesting birds (e.g., Coopers hawks or hummingbirds) and from mid-March through September for most other bird species. Pre-construction nesting bird surveys shall be conducted weekly, within 30 days prior to initiation of ground-disturbing activities to determine the presence/absence of active nests. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days before the start of clearance/construction work. Surveys shall include examination of trees, shrubs, and the ground, within grasslands, for nesting birds, as several bird species known to the area are shrub or ground nesters, including mourning doves. If ground-disturbing activities are delayed, additional pre-construction surveys shall be conducted so that no more than three days will have elapsed between the survey and ground-disturbing activities.

If active nests are located during pre-construction surveys, clearing and construction activities within 300 feet of the nest (500 feet for raptors) shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers and construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to

ensure that no inadvertent impacts on these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the Los Angeles Department of City Planning within 30 days of completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

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

**Less than Significant.** As indicated previously, the Project Site is located in Downtown Los Angeles in a highly urbanized area, is surrounded on all sides by urban development and is highly disturbed. Existing landscaping on the Project Site is limited to ornamental landscaping including shrubs and other ground cover within slope areas on-site, 16 Indian Laurel Fig trees (*Ficus microcarpa nitida*) along the Project Site's W. 8<sup>th</sup> Street frontage, four Silver Dollar Eucalyptus trees (*Eucalyptus polyanthemos*), and a row of Italian cypress trees along the on-site pedestrian walkway. The Indian Laurel Fig trees and Eucalyptus trees, while not considered protected within the City of Los Angeles Native Tree Protection Ordinance, are identified as Non-Protected Trees requiring replacement to the satisfaction of the City of Los Angeles Department of City Planning. Trees located outside of the Project Site but within the boundaries of the Unified Development Site include 69 Non-Protected Trees and 28 City of Los Angeles Street Trees, including 38 Jacaranda trees (*Jacaranda mimosifolia*), 22 Eucalyptus trees (*Eucalyptus* spp.), 18 London Plane trees (*Platanus x acerfolia*), eight Aleppo Pine trees (*Pinus halepensis*), six Mexican Fan Palm trees (*Washingtonia robusta*), and five Indian Laurel Fig trees (*Ficus microcarpa nitida*), none of which would be physically impacted by the Project. Lastly, 28 trees are located within the right-of-ways of the streets within the Unified Development Site and are considered City of Los Angeles Street Trees.

Project construction would remove existing trees from the Project Site. City policies dictate that all significant, non-protected street trees (8 inch or greater or cumulative trunk diameter if multi-trunked, as measured 54 inches above ground) be replaced at 1:1 ratio with a minimum of 24-inch box tree. Further, per the City's Street Tree policies, the City Department of Public Works' Urban Forestry Division's policy is to replace street trees removed during the construction of a project. As indicated, none of the 28 surveyed street trees on the Unified Development Site would be removed as part of Project implementation.

The 20 trees located within the Project Site (including 16 ficus trees and four eucalyptus trees) would be removed as part of project implementation. The trees would be replaced in accordance with City's policies. The applicant is required to submit a plot plan demonstrating a minimum 1:1 replacement ratio of existing significant, non-protected trees.<sup>8</sup> All other project landscaping would comply with all requirements of the LAMC and the City's Urban Forestry requirements. As also discussed above, there are 97 trees located within the Unified Development Site, but outside of the Project Site, including both Non-Protected Trees (69 trees) and City of Los Angeles Street Trees (28 trees). These trees would not be impacted by Project implementation and would remain in-place under the Project. As such, no additional tree replacement regarding these 97 on-site trees would be required.

<sup>8</sup> Lisa Smith, *The Tree Resource. Tree Report Prepared for Brookfield Property Partners 601 S. Figueroa Suite 2200 Los Angeles, California 90017. Property: 755 S. Figueroa St. (945 W. 8th Street) Los Angeles, CA 90017. June 6, 2017. Appendix A: Unified Development Site Tree Locations.*

Therefore, the Project would not conflict with local policies or ordinances protecting biological resources, and impacts are less than significant. No further analysis of this topic in an EIR is necessary.

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

**No Impact.**

The Unified Development Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan.<sup>9</sup> Therefore, the Project would not conflict with the provisions of any adopted conservation plan, and no impact would occur. No further analysis of this topic is necessary in an EIR and no mitigation measures are required.

## **V. CULTURAL RESOURCES**

*Would the project:*

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

**Potentially Significant Impact.** The Project Site is currently undeveloped aside from an existing covered concrete walkway that was constructed initially in 1985, then reconstructed in 2006, while the remainder of the Unified Development Site was developed between 1985 and 1992. Structures on the Unified Development Site do not meet the 45-year age guideline of the California Register of Historical Resources (California Register) to be evaluated for its potential as a historical resource. Nonetheless, there are several buildings over 45 years in age in the Project vicinity. The Project would result in the construction of a mixed-use project in proximity to several other buildings over 45 years in age, which could result in indirect impacts to historical resources in the area. As a result, it is recommended that the potential for indirect impacts to historical resources be analyzed further in an EIR.

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

**Potentially Significant Impact.** Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Unified Development Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have been previously disturbed. Nonetheless, Project construction would require excavation for subterranean parking levels, and other grading and excavation activities that could have the potential to disturb existing but undiscovered archaeological resources.

<sup>9</sup> California Department of Fish and Wildlife, *Habitat Conservation Planning, Natural Community Conservation Planning, Summary of Natural Community Conservation Plans (NCCPs)*, September 2016. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=15329&inline>. Accessed May 11, 2017.

Therefore, it is recommended that this topic be further analyzed in an EIR to determine the potential for, and significance of, any impacts on archaeological resources.

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

**Potentially Significant Impact.** The Unified Development Site does not contain any unique geologic features and is not known to have yielded previous vertebrate paleontological resources.<sup>10</sup> Fill materials underlying the subject site consist of sandy silts, sandy clays, silty sands and clayey sands, which are brown to dark brown in color, slightly moist to moist, medium dense, and firm to stiff, fine to coarse grained, with occasional gravel and asphalt fragments.<sup>11</sup> Fill thickness ranging from four to 15 feet was encountered in exploratory borings. Younger alluvial soils were encountered in borings near the southern boundary of the site. It is anticipated that the excavation of the proposed subterranean levels will remove all of the younger alluvial soils from the site. The existing fill materials and younger alluvium are underlain by older alluvium. Bedrock materials were encountered in all of the explorations.<sup>12</sup> Bedrock consists of sandstone and siltstone of the Fernando Formation. Since the Project would require excavation for subterranean parking and building foundation that could extend into native soils, including bedrock, which might contain undiscovered paleontological resources, it is recommended that this topic be analyzed further in an EIR to determine the potential for, and significance of, any impacts on paleontological resources.

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

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

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<sup>10</sup> *Los Angeles Citywide General Plan Framework Draft EIR, Figure CR-2, January 1995.*

<sup>11</sup> *Geotechnologies, Inc., Preliminary Geotechnical Engineering Investigation Proposed Mixed-Use Development 945 W. 8th Street, Los Angeles, California. June 2, 2017. Page 4. This document is included as Appendix C to this Initial Study.*

<sup>12</sup> *Ibid. Page 5.*

## VI. GEOLOGY AND SOILS

*In accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it results in any of the following impacts to future residents or users.*

*Would the project:*

- a. **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
  - i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions. Refer to Division of Mines and Geology Special Publication 42.**

**Less Than Significant Impact.** The following impact analysis pertaining to the Unified Development Site's underlying geology and soils is based, in part, on information contained in the *Preliminary Geotechnical Engineering Investigation Proposed Mixed-Use Development 945 W. 8th Street, Los Angeles, California* (Geotechnical Investigation) prepared by Geotechnologies, Inc. in June 2017. The Geotechnical Investigation is included as Appendix C of this Initial Study.

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

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

The Unified Development Site is not located within an Alquist-Priolo Earthquake Fault Zone, and based on a research of available literature, no known active or potentially active faults underlie the Unified Development Site. The closest Alquist-Priolo Earthquake Fault Zone to the Unified Development Site is associated with the Hollywood Fault, located approximately 4.3 miles north-northwest of the Unified Development Site at the closest point; the second closest is associated with the Newport-Inglewood Fault, located approximately 6.0

miles to the southwest at the closest point.<sup>13,14</sup> Several Quaternary faults (non-active faults) are also located greater than 5 miles from the Unified Development Site. The two closest blind thrust faults to the Unified Development Site are the Puente Hills Blind Thrust Fault, with the potentially active segment of the fault located 2.5 miles southwest of the Unified Development Site, and the Elysian Park Thrust Fault, which generally underlies the southwest portion of the Los Angeles Basin, with the active segment of the fault located approximately 3.75 miles southwest of the Unified Development Site. Based on this information, the Geotechnical Investigation concluded that the potential for ground surface rupture at the Unified Development Site is low, and thus, the Project would not expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, impacts from fault rupture would be less than significant. No further analysis of this topic is necessary in an EIR and no mitigation measures are required.

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

**Potentially Significant Impact.** The Unified Development Site is located within the seismically active Southern California region and is exposed to similar seismic risk to properties in the City. The level of ground shaking that would be experienced at the Unified Development Site from active or potentially active faults or blind thrust faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology. The active faults that could produce shaking at the Unified Development Site are the same faults discussed in Checklist Question VI(a)ii above, plus the Whittier-Elsinore Fault, San Jacinto Fault, San Andreas Fault and numerous other smaller faults and blind thrust faults found throughout the region.

While it is likely that the Unified Development Site would experience earthquake shaking the Project would be required to conform to the current seismic design provisions of the 2016 CBC (as amended by the City's Building Code), which incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to applicable recommendations provided in the Geotechnical Investigation, to minimize seismic-related hazards.

The Geotechnical Investigation concluded that the Project is a feasible location from a geotechnical engineering perspective. Nonetheless, given specific site conditions and the potential for strong seismic ground shaking in the Project area potential project impacts regarding seismic ground shaking are considered potentially significant and thus further analysis of this issue in an EIR is recommended.

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

**Less Than Significant Impact.** Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. This fluid-like state can result in

<sup>13</sup> California Geological Survey, *Earthquake Zones of Required Investigation: Hollywood Quadrangle*. November 6, 2014. Available at: [http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood\\_EZRIM/Hollywood\\_EZRIM.pdf](http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf). Accessed May 10, 2017.

<sup>14</sup> California Geological Survey, *Special Studies Zones: Inglewood Quadrangle*. July 1, 1986. Available at: <http://gmw.consrv.ca.gov/shmp/download/quad/INGLEWOOD/maps/INGLEWOOD.PDF>. Accessed May 10, 2017.

horizontal and vertical movements of soils and building foundations from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion.

The CGS has delineated seismic hazard zones in areas where the potential for strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events are likely to occur. As shown on the November 6, 2014, Earthquake Zones of Seismic Investigation for the Hollywood Quadrangle, the Unified Development Site is not located within a mapped potential liquefaction hazard zone.<sup>15</sup> Groundwater seepage was encountered at a depth of 26 feet in three of the seven borings conducted at the Project Site and was not encountered in any other borings to a depth of 150 feet. Therefore, shallow groundwater, one of the three conditions generally required for liquefaction to occur, is not present at the Project Site. Additionally, while the Geotechnical Investigation found that the shallow fill material underlying the Project Site is unsuitable to support the proposed structures, the Project would remove the fill materials and expose the underlying native soils, which are very dense to very stiff and not subject to liquefaction. As a result, the Geotechnical Investigation concluded that the potential for liquefaction at the Project Site is remote. Because the Project would remove unstable soils at the Project Site, and thus improve site conditions for construction, the Project would not exacerbate existing environmental conditions. Therefore, the impacts associated with liquefaction would be less than significant. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

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

**Less Than Significant Impact.** The Unified Development Site is not located within a City-designated Hillside Grading Area, is not subject to the City's Hillside Ordinance, and is not located in a City-designated Landslide area.<sup>16,17</sup> Additionally, the Unified Development Site is located in the downtown area, and despite the 36-foot elevation change between the north and south ends of the Project Site (which slopes downward to the south from south to north), the surrounding area is relatively flat and not within the proximity of any mountains or steep slopes. Furthermore, the Project would address the difference in slope across the Project Site by designing the buildings to accommodate the elevation change (see Figure A-10, Building Elevations, in Attachment A, Project Description, of this Initial Study), and by designing the buildings and undertaking associated construction activities in accordance with the grading, excavation, building, and design requirements of the California Building Code (CBC) and City of Los Angeles Municipal Code (LAMC), including the Building Code and Grading Ordinance. As such, there is little potential for landslides to occur on or near the Unified Development Site or for the Project to exacerbate existing environmental conditions at the Project Site related to slopes and landslides. Therefore, the Project would not expose people or structures to potential substantial adverse effects involving landslides, and a less than significant impact would result. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

<sup>15</sup> California Geological Survey, *Earthquake Zones of Required Investigation: Hollywood Quadrangle. November 6, 2014.* Available at: <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>. Accessed May 10, 2017.

<sup>16</sup> City of Los Angeles Department of City Planning, *Parcel Profile Report: 945 W. 8<sup>th</sup> Street.* Generated May 11, 2017.

<sup>17</sup> City of Los Angeles General Plan Safety Element, *Exhibit C: Landslide Inventory & Hillside Areas. November 26, 1996.* Available at: <https://planning.lacity.org/cwd/gnlpln/softyelt.pdf>. Accessed May 10, 2017.

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

**Less Than Significant Impact.** Project construction activities would include ground-disturbing activities (e.g., removal of the existing pedestrian walkway and vegetation, excavation, foundation construction, the installation of utilities). These activities would expose soils for a limited time, allowing for possible erosion.

Although Project development has the potential to result in soil erosion, this potential would be reduced by implementation of standard erosion controls imposed during project construction. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion. In addition, on-site grading and site preparation must also comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. This municipal code section requires that all grading activities occur in accordance with grading permits issued by the Department of Building and Safety.

The permits typically require that excavation and grading activities be scheduled during dry weather periods. Should grading activities occur during the rainy season (October 1<sup>st</sup> to April 14<sup>th</sup>), a Wet Weather Erosion Control Plan (WWECP) must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. The WWECP must include measures such as diversion dikes to channel runoff around the Project Site. Division 70 of the LAMC also requires that stockpiles, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. A deputy grading inspector is required be on-site during grading operations to ensure adhered to applicable regulations. Lastly, as Project construction would disturb more than one acre, the Project applicant would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A: Construction Activities, to control erosion and to protect the quality of surface water runoff during the Project's construction period.

Regarding soil erosion during Project operations, the potential is relatively low due to the fact that the Project Site would be improved with the proposed mixed-use development and/or landscaped. The use of hardscapes, vegetation, and groundcover would act as an effective barrier to soil erosion by impeding direct contact between precipitation/irrigation and the on-site soils. In addition, the Project would not exacerbate existing environmental conditions because, rather than maintaining the site in its currently undeveloped and unprotected condition where natural erosion and loss of topsoil can occur due to strong winds and rain events, the Project would develop the Project Site with hardscape and landscaping that would minimize erosion and the loss of topsoil.

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

**c. Be located on a geologic unit 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 existing environmental conditions?**

**Potentially Significant Impact.** Fill material underlies the Project Site to a depth of four to ten feet below the ground surface. Native soils underlying the fill material are made up of recent-age alluvium consisting of silty sands to gravelly sands, with occasional layers of sandy and clayey silts, sediments deposited by river and stream action typical to this area of Los Angeles. Potential impacts with respect to soil-related unstable geologic units would be less than significant because Project grading and soil compaction would occur in accordance with CBC and LAMC grading requirements that have been formulated to provide adequate support for new development.

With respect to lateral spreading, or collapse, Project construction and design would comply with the 2016 CBC, as enforced by the City of Los Angeles. Additionally, the Geotechnical Investigation concluded that no significant permanent slopes currently exist within the Project Site or on the larger Unified Development Site; therefore, slope stability is not considered an issue with respect to Project development, and thus impacts related to landslides would be less than significant as discussed in Checklist Question VI(a)(iv) above.

The Geotechnical Investigation concludes that some settlement would be expected at all buildings during a seismic event.<sup>18</sup> Therefore, settlement/subsidence is considered a potential issue with respect to Project development

With regard to collapse, the subterranean retaining walls would comply with the CBC, as incorporated into the City's Building Code. The Project would also incorporate the recommendations of the Geotechnical Investigation, including observing maximum earth pressures and adjacent surcharge, waterproofing and retaining wall drainage, utilizing proper backfill, and installing an adequate sump system. Temporary excavations during construction would cause disturbance of existing soils and contribute to potential localized raveling or caving of excavated areas (e.g. the excavated side walls losing stability). Such potential effects are typical of construction for projects with deep excavations, but given the potential for localized collapse, impacts in this regard are considered potentially significant.

With regard to liquefaction, see the response to Checklist Question VI(a)(iii).

Based on the above, implementation of the Project could result in potentially significant impacts related to subsidence and/or collapse during construction activities, particularly as relates to deep excavations and construction adjacent to existing structures. As such, evaluation of these issues in an EIR is recommended.

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

**Potentially Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Geotechnical Investigation found that native soils underlying the Unified Development Site are in the low to moderate

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<sup>18</sup> *Ibid.* Page 22.

expansion range, with an expansion index ranging from 20 and 77.<sup>19</sup> Although the Project would be constructed and designed in accordance with the 2016 CBC, as enforced by the City of Los Angeles, which includes building foundation requirements appropriate to site-specific conditions, potential adverse effects associated with the presence of on-site expansive soils cannot be ruled out. As such, impacts in this regard are considered potentially significant and further evaluation of this issue in an EIR is recommended.

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

## VII. GREENHOUSE GAS EMISSIONS

*Would the project:*

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

**Potentially Significant Impact.** Construction and operation of the Project would increase greenhouse gas (GHG) emissions which have the potential to either individually or cumulatively result in a significant impact on the environment. In addition, the Project would generate vehicle trips that would contribute to the emission of GHGs. The amount of GHG emissions associated with the Project has not been estimated at this time. Therefore, it is recommended that this topic be further evaluated in an EIR, including an assessment of Project-generated GHG emissions resulting from construction equipment, vehicle trips, electricity and natural gas usage, and water conveyance, as well as relevant Project features that reduce GHG emissions.

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

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

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<sup>19</sup> *Ibid.* Page 15.

## 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?**

**Less Than Significant Impact.** Project construction would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. Project operation would involve the long-term use of hazardous substances in the form of household- and restaurant-related cleaning solutions, chemicals used in landscape maintenance (pesticides and herbicides), paint and paint thinner, and possible diesel for any emergency generators. However, all such materials would be transported, used, stored, and disposed of in accordance with applicable regulations and manufacturer instructions which have been formulated to avoid a significant hazard to the public or the environment. Furthermore, the Project would not include industrial, manufacturing, energy production, or other types of activities often associated with the transport, use, storage and disposal of large quantities of hazardous materials. Therefore, this impact would be less than significant, no mitigation measures are required, and need not be evaluated further in an EIR.

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

**Less Than Significant Impact.** To preliminarily assess the potential for hazardous materials during Project construction and preparation, a technical investigation was conducted into the historical and existing use of hazardous materials within the Project Site. This investigation, entitled *Phase I Environmental Site Assessment – 755 South Figueroa Street Los Angeles, CA 90017 CEI#: 376-001-0317* (Phase I ESA) prepared by Certified Environments, Inc. in May 2017 (contained in Appendix A of this Initial Study), concluded that no Recognized Environmental Conditions (RECs) are known or suspected to exist within the Project Site. Furthermore, as the Project Site is currently not developed with any active uses, no activities involving hazardous materials currently occur on the Project Site. As discussed in Checklist Question VII(a) above, the Project would not include the use, transport, use or storage of hazardous materials that could create a significant hazard. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. A less than significant impact would occur, no mitigation measures are required, and this issue need not be evaluated further in an EIR

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

**Less Than Significant Impact.** There are no existing or proposed schools located within one-quarter mile of the Unified Development Site. The nearest schools to the Unified Development Site are Olympic Primary Center (kindergarten), which is approximately 0.4 miles to the southwest; Tenth Street Elementary, which is approximately 0.6 miles to the southwest; John H. Liechty Middle School, which approximately is 0.5 miles to the west, and Santee Educational Complex, which is approximately 1.3 miles to the south.

Los Angelitos Children's Center is located approximately 0.3 miles to the southeast. Project construction would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils, and the emission of diesel fumes from

construction equipment. Operation of the Project would involve the use of household- and restaurant-related cleaning solutions, paint and paint thinner, landscape maintenance chemicals (herbicides and pesticides) and potentially diesel for any emergency generators, with the emission of hazardous materials restricted to any emergency generator use. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions, and any emissions from the use of such materials would be minimal and localized to the Project Site.

Therefore, the Project would result in less than significant impacts regarding hazardous materials at any schools within a one-quarter mile radius of the Project Site. No mitigation measures are required, and no further analysis of this topic in an EIR is recommended.

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

**Less Than Significant Impact.** The Project Site is not located within a City-designated Methane Zone. Therefore, development of the Project would not have the potential to expose Project residents, employees, or guests to potentially hazardous methane levels.

Government Code Section 65962.5, amended in 1992, requires CalEPA to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites (National Priorities List); State Response sites; Voluntary Cleanup sites; and School Cleanup sites.

Based on a review of the EnviroStor database, the Project Site is not identified on any of the above lists.<sup>20</sup> In addition, the Project Site is not on the State Water Board's Geotracker Database, which provides a list of leaking underground storage tank sites that are included on the Cortese List.<sup>21</sup> Lastly, the Project Site is not listed in any of the records search results performed as part of the Project Site-specific Phase I ESA.<sup>22</sup> Based on this and other information, the Phase I ESA concluded that no RECs or Historical RECS (HRECS) occur on the Project Site.<sup>23</sup> Furthermore, while the Project Site Phase I ESA identified some surrounding properties within the various search radii as being listed on a number of state and federal hazardous materials databases, the Phase I ESA concluded that none of these represent RECs at the Project Site.<sup>24</sup> See **Table B-1, Hazardous Materials Database Listings Summary**, for a summary of the database search findings. See the Phase I ESA for detailed information concerning the off-site listings.

<sup>20</sup> Department of Toxic Substances Control, EnviroStor Database at <http://www.envirostor.dtsc.ca.gov/public>; accessed May 12, 2017.

<sup>21</sup> State Water Resources Control Board, <https://geotracker.waterboards.ca.gov>; accessed May 12, 2017.

<sup>22</sup> Certified Environments, Inc. Phase I Environmental Site Assessment – 755 South Figueroa Street Los Angeles, CA 90017 CEI#: 376-001-0317. May 2017. Attachment E.

<sup>23</sup> *Ibid*, Page 12.

<sup>24</sup> *Ibid*. Page 13.

Table B-1

## Hazardous Materials Database Listings Summary

Database	Search Distance	Project Site Listed	Properties within Search Radius Listed	REC at the Project Site <sup>a</sup>
Federal NPL	1.0 mile	No	None	No
Federal CERCLIS	0.5 mile	No	2	No
Federal CERCLIS NFRAP	Project Site/ adjoining properties	No	None	No
Federal CORRACTS TSD	1.0 mile	No	None	No
Federal RCRIS	0.5 mile	No	None	No
Federal ERNS	Project Site/ adjoining properties	No	2	No
State SPL	Project Site	No	None	No
State SCL	1.0 mile	No	None	No
SWF/LF	0.5 mile	No	None	No
LUST	0.5 mile	No	None	No
UST	Project Site/ adjoining properties	No	27	No

<sup>a</sup> The potential to impact the subject property was based on several factors including, but not limited to: closure status by regulatory agencies, distance from the subject property, estimated direction of groundwater flow, soil/geologic factors, urban setting, and other reasonable factors. CEI notes that according to ASTM E 1527, Section 7.121, the search distance may be reduced at the discretion of the environmental professional based on the previously mentioned factors.

Source: Certified Environments, Inc. Phase I Environmental Site Assessment – 755 South Figueroa Street Los Angeles, CA 90017 CEI#: 376-001-0317. May 2017.

No additional investigation or remedial action would be needed. However, although no known environmental concerns were identified for the Project Site in the Phase I ESA, there is a limited potential for unknown hazardous materials conditions to exist on the property. As noted above, should unknown hazardous materials or other hazardous conditions be discovered during project construction, removal and remediation of such conditions would occur in accordance with applicable regulations. As such, given the lack of known hazardous materials conditions associated with listed hazardous materials sites in the Project area, and compliance with existing hazardous materials regulations should such conditions be discovered during construction activities, impacts would be less than significant, no mitigation measures are required, and no further analysis of this issue in an EIR is recommended.

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

**(e, f) No Impact.** The Unified Development Site is not located within an airport land use plan and it is not within two miles of a public use airport or private air strip. The three nearest airports are Hawthorne Municipal Airport, Santa Monica Municipal Airport, and Los Angeles International Airport, which are located approximately 9, 11 and 10 miles southwest of the Unified Development Site, respectively. As a result, project

implementation would have no impact due to airport hazards. Further analysis of this topic in an EIR is not necessary and mitigation measures are not required.

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

**Less Than Significant Impact.** The Unified Development Site is located in an established urban area that is well served by the surrounding roadway network. Figueroa Street adjacent to the Unified Development Site, as well as the nearby Harbor (SR-110) and Santa Monica (I-10) Freeways are designated Selected Disaster Routes by the City.<sup>25</sup> Some short – term construction activities may temporarily impact access on portions of adjacent streets during certain periods of the day. The Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access for emergency vehicles in the project area. Furthermore, in accordance with City requirements, the Project would develop a Construction Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

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

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

**No Impact.** The Unified Development Site is located in the highly urbanized downtown area of Los Angeles. No wildlands are present on the Unified Development Site or surrounding area. Furthermore, the Unified Development Site is not within a City-designated wildfire hazard area.<sup>26</sup> Although the Project is not located in a City designated wildfire hazard area, the Project would be consistent with the City Fire Code, fire requirements, smoke/fire alarms, fully sprinklered indoor spaces, and irrigated landscaped areas. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

<sup>25</sup> *City of Los Angeles General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems.*

<sup>26</sup> *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles; <http://cityplanning.lacity.org/cwd/gnlpln/safteylt.pdf>, accessed May 10, 2017.*

## IX. HYDROLOGY AND WATER QUALITY

*Would the project:*

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

**Less Than Significant Impact.** The Project Site portion of the Unified Development Site is currently undeveloped with the exception of an existing covered pedestrian walkway and associated landscaping and stormwater drainage improvements. The Project Site slopes downward to the south, with approximately 36 feet of elevation change across the Project Site from north to south. Stormwater runoff currently flows from the Project Site into the City's storm drain system via a system of existing v-ditches and catch basins on the property. Project construction would include earthwork activities, including grading and excavation, which would expose soils for a limited time and could allow for possible erosion, particularly during precipitation events. However, as discussed in the responses to the Geology questions in this Initial Study (Checklist Question VI(a) through VI(e)), all grading activities would require grading permits from the City's Department of Building and Safety, which include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. Additionally, grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which includes requirements such as the preparation of an erosion control plan to reduce the effects of sedimentation and erosion. In addition, the Project applicant would be required to implement the provisions of the Project-specific SWPPP in accordance with the NPDES permit. The SWPPP is subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A: Construction Activities. As part of these regulatory requirements, BMPs must be implemented to control erosion and to protect the quality of surface water runoff during the construction by controlling potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides. Should grading activities occur during the rainy season (October 1<sup>st</sup> to April 14<sup>th</sup>), a WVECP must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. Compliance with the applicable regulatory requirements described above would ensure that construction-related water quality impacts would be less than significant.

With regard to Project operation, the Project would be required to incorporate structural BMPs per the City's Standard Urban Stormwater Mitigation Plan (SUSMP) permit requirements and in accordance with the City's 2012 Low Impact Development (LID) Ordinance. The ordinance required that all housing developments of 10 or more units and/or commercial developments with one acre or more of impervious surface area capture water runoff at its source through a set of design approaches and BMPs. Accordingly, BMPs to reduce the volume and intensity of stormwater runoff leaving the Project Site would be incorporated into the Project design in accordance with the City's Best Management Practices Handbook, Part B: Planning Activities. In accordance with these requirements, the Project would either infiltrate into the underlying soils, capture and re-use, and/or bio-filtrate and retain the Project Site non-storm and "first flush"<sup>27</sup> stormwater runoff. In the event that a storm event produces runoff greater than LID (i.e., first flush) requirements, this overflow would continue to flow to the existing streets and into catch basins along W. 8<sup>th</sup> Street. The W. 8<sup>th</sup> Street catch basins ultimately drain to a 24-inch reinforced concrete pipe (RCP) under Francisco Street which then drains to a 45-inch RCP storm drain near the intersection of Georgia Street and W. Olympic Boulevard.<sup>28</sup> Long-term BMPs for this Project could include, but are not limited to, ensuring that discharge from downspouts, roof drains,

<sup>27</sup> *First-flush" flows are the first 0.75 inch of rain to fall in a 24-hour period.*

<sup>28</sup> *Los Angeles Department of Public Works, Bureau of Engineering. Navigate LA. Available at: <http://navigatela.lacity.org/navigatela/>. Accessed May 10, 2017.*

and scuppers would not be permitted on unprotected soils. Further, storm drain inlets and catch basins within the Project area would be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping. The final selection of BMPs would be completed through coordination with the City of Los Angeles during the building and grading permit processes. Through preparation and implementation of the SUSMP, operational water quality impacts would be minimized. Additionally, Project implementation would improve the quality of stormwater runoff from the Project Site when compared to existing conditions, due to the limited improvement on the Project Site that were made prior to adoption of current standards. The Project's proposed BMPs would be submitted to the City for review as part of the Project's building permit approval process.

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

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

**Less Than Significant Impact.** The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including water supplied by the Metropolitan Water District supplies (57% overall; Bay Delta 48%, Colorado River 9%), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (29%), local groundwater from the San Fernando groundwater basin (12%), and recycled water (2%).<sup>29</sup> Based on the City's most current Urban Water Management Plan (UWMP), in 2015, LADWP had an available water supply of roughly 513,540 acre-feet, with approximately 17 percent coming from local groundwater.<sup>30</sup> Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins. Although the Project would increase the extent of impervious surfaces on the Unified Development Site (i.e., by replacing generally pervious surface within the Project Site with a mixed-use tower and Podium structure), the overall effect of the Project on groundwater recharge at the Unified Development Site would not be considered substantial. This is based on the limited area to be converted to impervious surfaces and the existing slopes and stormwater infrastructure that currently convey much of the stormwater generated on-site to off-site storm drain facilities, which limit the potential for notable groundwater recharge to occur on the Project Site.

As reported in the Geotechnical Investigation, the historic groundwater level at the Project Site is approximately 65 feet below ground surface.<sup>31</sup> Groundwater seepage was encountered at a depth of 26 feet at

<sup>29</sup> Los Angeles Department of Water and Power: Facts and Figures. Available at: [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?.adf.ctrl-state=j77lkjtqw\\_4&\\_afLoop=357285129360562](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?.adf.ctrl-state=j77lkjtqw_4&_afLoop=357285129360562) Accessed May 11, 2017.

<sup>30</sup> Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit ES-T – Driest Three-Year Water Supply Sequence, adopted June 7, 2016. Available at: <file:///C:/Users/dcrook/Downloads/2015%20Urban%20Water%20Management%20Plan-LADWP.pdf>. Accessed May 11, 2017.

<sup>31</sup> Geotechnologies, Inc., Preliminary Geotechnical Engineering Investigation Proposed Mixed-Use Development 945 W. 8th Street, Los Angeles, California. June 2, 2017. Page 5.

Boring B6 and at 68 feet in Boring B2, but was not encountered in any other borings to a depth of 150 feet.<sup>32</sup> Because excavation for building foundation is anticipated to be required to a depth of approximately 15 feet below ground surface at the lowest point within the Project Site, groundwater is not expected to be encountered during construction or operation, and substantial dewatering would not be required.<sup>33</sup> Therefore, the Project would not substantially deplete groundwater supplies or result in a substantial net deficit in the aquifer volume or lowering of the local groundwater table and impacts to groundwater would be less than significant. No mitigation measures are required and no further analysis of this topic in an EIR is necessary.

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

**Less Than Significant Impact.** During Project construction, temporary alteration of existing on-site drainage patterns may occur and rainfall occurring during the grading and excavation phases has the potential to carry exposed sediments into the local storm drain system. As discussed under Checklist Question VI(b), with the implementation of required BMPs, which include erosion and sediment control, or a WVECP, if construction occurs during the rainy season, and regular inspection of the construction site to ensure proper installation and maintenance of the BMPs, construction activities are not expected to result in substantial erosion or siltation on- or off-site. Runoff currently flows off the Unified Development Site and into area streets via an on-site stormdrain system, ultimately flowing into City storm drain system via catch basins on adjacent streets. Since all catch basins serving the Unified Development Site ultimately flow to a 24-inch RCP under Francisco Street, there would be no substantial alteration of on-site drainage pattern. There is no potential for downstream erosion since the street is paved and otherwise stabilized. As such, any alteration of existing drainage patterns would not result in substantial erosion or siltation on- or off-site and Project impacts related to this topic would be less than significant.

As mentioned above, under existing conditions, most stormwater runoff flows off the Unified Development Site and into the local storm drain system via catch basins on the adjacent streets. This condition would not change as a result of the Project. The Unified Development Site is located in an urbanized area and is largely covered with impervious surfaces. As a result, the Project would not be expected to materially increase the quantity of urban runoff from the Unified Development Site. Rather, implementation of the detention/retention features discussed in Checklist Question IX(a) in accordance with the City's LID Ordinance and SUSMP would at a minimum, maintain the volume of first-flush flows during storm events when compared to existing conditions, which are not compliant with current LID stormwater regulations. There is not any known potential of downstream erosion or flooding due to the fact that the street is paved and otherwise stabilized. Final plan check by the Los Angeles Bureau of Engineering (BOE) would ensure that adequate capacity is available in the storm drain system prior to Project approval. The Applicant would be responsible for providing the necessary storm drain infrastructure improvements to connect with the existing drainage system serving the Unified Development Site. As a result, Project development would not result in substantial erosion or siltation on- or off-site. Therefore, a less than significant impact would occur. No mitigation measures would be required and no further analysis of this topic in an EIR is necessary.

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<sup>32</sup> *Ibid.* Page 5.

<sup>33</sup> *Ibid.*, Cross-Section A-A', page 66.

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

**Less Than Significant Impact.** While the Project Site is under construction, the rate and amount of surface runoff generated at the Project Site would fluctuate. However, the construction period is short-term and compliance with applicable regulations discussed in Checklist Question IX(a) above would preclude fluctuations that result in flooding. With regard to operations, as discussed above, the Project would implement BMPs in accordance with the City's LID Ordinance and SUSMP to at a minimum, maintain the volume and water quality of first-flush stormwater flows from the Project Site.<sup>34</sup> As a result, the Project would not adversely affect local drainage systems. Stormwater would continue to flow into the City's storm drain system via catch basins on the adjacent streets, all of which ultimately discharge to a 24-inch RCP along Francisco Street. There is currently no known deficiency in the stormwater system serving the Project vicinity. Final plan check and approval by BOE, which would be required prior to Project implementation, would ensure that adequate capacity is available in the storm drain system in this system prior to Project approval.

The Applicant would be responsible for providing the necessary storm drain infrastructure improvements to connect with the existing drainage system serving the Unified Development Site. Lastly, the Unified Development Site is not located adjacent to any stream or river, and Project runoff would continue to drain into existing City storm drain infrastructure. There is not any known potential of downstream erosion or flooding since the storm drain system is completely channelized in subterranean pipes and not subject to course alterations. Therefore, the Project would not have the potential to result in flooding due to altered drainage patterns and impacts would be less than significant. .

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

**Less Than Significant Impact.** The stormwater runoff generated on-site currently flows into the City's storm drain system via an existing system of stormwater catch basin and drain facilities. As discussed above, the Project would implement BMPs to capture and treat first flush stormwater flows in accordance with the City's LID Ordinance and SUSMP, which would at a minimum, maintain the volume of first flush stormwater flows and pollutants as under existing conditions. Final plan check and approval by BOE, which would be required prior to Project implementation, would ensure that adequate capacity is available in the storm drain system prior to Project approval. The Applicant would be responsible for providing the necessary storm drain infrastructure improvements to connect with the existing drainage system serving the Unified Development Site. Therefore, a less than significant impact would result.

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

**Less Than Significant Impact.** As discussed above in Checklist Question IX(a), construction and operational BMPs implemented as part of the Project's SWPPP, the City's LID Ordinance and SUSMP, and good housekeeping practices would preclude sediment and hazardous substances from entering stormwater flows.

<sup>34</sup> *First flush is the initial surface runoff of a rainstorm. During this phase, water pollution entering storm drains in areas with high proportions of impervious surfaces is typically more concentrated compared to the remainder of the storm. Consequently, these high concentrations of urban runoff result in high levels of pollutants discharged from storm sewers to surface waters.*

Therefore, a less than significant impact would result and no mitigation measures are required. Further analysis of this topic in an EIR is not necessary.

- g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**
- h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

**No Impact (g-h).** The Unified Development Site is not located within a flood zone, including the 100-year flood zone designated by the Federal Emergency Management Agency (FEMA).<sup>35,36</sup> Thus, no impacts related to flood hazard areas would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is necessary.

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

**No Impact.** As discussed above, the Unified Development Site is not located within a designated floodplain. Further, the Unified Development Site is not located within a potential inundation area, being located west of the inundation area for the Los Angeles River.<sup>37</sup> Additionally, there are no levees or dams in the Project vicinity. Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, would occur. No mitigation measures are required and no further analysis of this issue in an EIR is necessary.

- j. Inundation by seiche, tsunami, or mudflow?**

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

With respect to tsunami hazards, the Unified Development Site is located approximately 13 miles inland (east-northeast) from the Pacific Ocean, and therefore would not be subject to a tsunami. Furthermore, the Unified Development Site is not located on a City-designated tsunami hazard area.<sup>38</sup> The Unified Development Site is also located in an area of relatively flat topography and urban development, with no enclosed bodies of water nearby, and as such, there is no potential for inundation resulting from a seiche and negligible potential for mudflows. Therefore, no impacts would occur due to inundation by tsunami or mudflow. No further analysis of this topic is necessary and no mitigation measures are required.

<sup>35</sup> City of Los Angeles Department of City Planning, *Parcel Profile Report: 945 W. 8<sup>th</sup> Street*. Generated May 11, 2017.

<sup>36</sup> Federal Emergency Management Agency, *Flood Insurance Rate Map Number 06037C1620F, Effective Date September 26, 2008*.

<sup>37</sup> City of Los Angeles General Plan, *Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994*.

<sup>38</sup> City of Los Angeles, Department of City Planning, *Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit G – Inundation & Tsunami Hazard Areas In the City of Los Angeles; <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed May 10, 2017.*

## X. LAND USE AND PLANNING

*Would the project:*

### a. **Physically divide an established community?**

**Less Than Significant Impact.** The Unified Development Site is located within the boundaries of the Central City Community Plan, in the highly urbanized downtown area of Los Angeles. The Project area is generally built out with a variety of office, residential, entertainment, and commercial uses, as well as structured and surface parking areas. Development is generally dense, with mid- to high-rise structures typifying nearby development. The Project would be infill development and would introduce new residential and commercial uses on the Project Site, which would be similar to adjacent and nearby land uses. While the Project would result in minor changes to the way vehicles access the Unified Development Site (i.e., new driveways on the Project's W. 8<sup>th</sup> Street frontage where none exist today), traffic in the surrounding community would continue to utilize the same circulation facilities and patterns as occur presently. Further, the Level B1 frontage of the Project would directly abut and incorporate the existing outdoor plaza, which extends eastward to S. Figueroa Street and would support connectivity between the Unified Development Site and the S. Figueroa corridor and entertainment destinations to the south while also encouraging a pedestrian-friendly streetscape. The Project's commercial frontage would interface directly with the existing outdoor plaza, which would also help activate this portion of the plaza and promote pedestrian activity.

Therefore, the Project would not physically divide an established community and a less than significant impact would result. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

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

**Potentially Significant Impact.** The Unified Development Site is located within the Central City Community Plan Area and a State Enterprise Zone. The Unified Development Site is located in Height District 4, which permits a floor area ratio (FAR) of up to 13:1, or thirteen times the buildable area of the site. However, the "D" Limitation, enacted by Ordinance 164,307 (Subarea 1930), effective January 30, 1989, limits new development on the site to a total floor area ratio (FAR) of 6:1 (with certain exceptions). The Unified Development Site is not subject to this 6:1 FAR limitation because it received a floor area Variation from the Community Redevelopment Agency of the City of Los Angeles (CRA) in 1981 to permit an increase in allowable floor area from 6:1 to 9.5:1. In exchange for the floor area Variation, an open space fee of \$5,000,000 was paid to the CRA for the acquisition of Grand Hope Park as noted previously in the Project Description. It should be noted that the City is currently updating the Central City Community Plan. The Unified Development Site is designated as a Transit Core area in the draft land use designation maps. The maximum FAR in the Transit Core is 13:1. Transit core areas are considered dense centers of activity built around regional transit hubs that provide easy access for pedestrians, transit users, and cyclists to a variety of experiences and activities. The general uses emphasized for the Transit Core are mixed-use, multi-family, residential, entertainment, and office.

The Applicant is requesting several entitlements and other approvals, including a Vesting Tentative Tract Map. A Conditional Use Permit (Alcohol) pursuant to LAMC Section 12.24.W.1 to allow the sale and/or dispensing

of alcoholic beverages for on-site consumption is also being requested, along with a Conditional Use Permit for Floor Area Averaging for a Unified Development and a Site Plan Review pursuant to LAMC Section 16.05 are also being requested, among other approvals. Evaluation of the effects of the Project's requested entitlements and approvals, and evaluation of Project's consistency with other applicable plans, policies, and regulations, is therefore recommended in an EIR.

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

**No Impact.** As discussed in Checklist Question IV, Biological Resources, the Unified Development Site is located in the highly urbanized downtown area of Los Angeles and has been heavily disturbed by previous development and/or is developed with urban uses. The Unified Development Site does not contain any known habitat areas or other sensitive resources. The Project Site is largely undeveloped, and it contains only minimal ornamental landscaping. The Unified Development Site is not located within the boundaries of a habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with the provisions of any adopted applicable conservation plan. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

## XI. MINERAL RESOURCES

*Would the project:*

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

**No Impact (a-b).** The Unified Development Site is not classified by the City of Los Angeles as containing significant mineral deposits.<sup>39</sup> Furthermore, the Unified Development Site is not designated as an existing mineral resource extraction area by the State of California or the U.S. Geological Survey.<sup>40</sup> Additionally, the Unified Development Site is designated for Regional Center Commercial and High Density Residential uses within the City of Los Angeles General Plan Framework and is not designated for mineral extraction land use. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. No impacts to mineral resources would occur. Further analysis of mineral resources is not necessary in an EIR and no mitigation measures are required.

<sup>39</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure GS-1 – Areas Containing Significant Mineral Deposits in the City of Los Angeles. Available at: [http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR2.17\\_p1-35.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.17_p1-35.pdf). Accessed May 10, 2017.

<sup>40</sup> California Geological Survey/U.S. Geological Survey, 2012-2013 Minerals Yearbook, California (Advanced Release), June 2016; [https://minerals.usgs.gov/minerals/pubs/state/2012\\_13/myb2-2012\\_13-ca.pdf](https://minerals.usgs.gov/minerals/pubs/state/2012_13/myb2-2012_13-ca.pdf). Accessed May 10, 2017.

## XII. NOISE

*Would the project result in:*

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

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

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

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

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

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

**Potentially Significant Impact.** As discussed in Checklist Question XII(a), Project operation may increase existing noise levels as a result of Project-related traffic, the operation of HVAC systems, loading and unloading of trucks, vehicles in the parking garage, outdoor dining, bar, pool, and recreation areas on the Residential Amenity Level, and resident/guest and commercial patron activities within the Project Site and the larger Unified Development Site. Therefore, it is recommended that potential impacts associated with a permanent increase in ambient noise levels be analyzed further in an EIR.

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

**Potentially Significant Impact.** As discussed in Checklist Question XII(a), Project construction would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate

noise on a short-term basis. In addition, periodic resident or commercial events associated with the Project may be held at one or more of the Project's outdoor spaces (e.g., existing outdoor plaza, Residential Amenity Deck, W. 8<sup>th</sup> Street plaza), which could generate periodic noise levels in excess of ambient noise levels in the area. Therefore, it is recommended that potential impacts associated with a temporary or periodic increase in ambient noise levels be further analyzed in an EIR.

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

**(e-f) No Impact.** As discussed in Checklist Question VIII(e and f) above, the Unified Development Site is not located within an airport land use plan or within two miles of an airport. The two nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport, which are located approximately 11 and 10 miles southwest of the Unified Development Site, respectively. Therefore, the Project would not expose its future residents or residents within the Project vicinity to excessive noise levels from airport use. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

### **XIII. POPULATION AND HOUSING**

*Would the project:*

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

**Potentially Significant Impact.** The Project is located within the jurisdiction of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and Regional Housing Needs Assessment (RHNA), in coordination with other State and local agencies. These documents provide guidelines for growth at the regional level, and include population, employment, and housing projections for the region and its subdivisions. On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. It also includes projections of population, households, and employment through 2040.

The Project would include housing units accommodating additional population and would also create new employment opportunities. Specifically, the Project would provide up to 781 new dwelling units and approximately 6,700 square feet of new commercial uses (i.e., retail, restaurant) that would provide new housing and employment opportunities. Therefore, the Project's growth contributions should be reviewed for consistency with the SCAG projections; and consistency with regional growth policies. The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the infill Project would utilize the existing transportation and utility infrastructure to serve the Project.

However, the Project would introduce new residential units and employment opportunities to the Unified Development Site. Further analysis of this topic in an EIR is recommended to assess the consistency of the Project's direct and indirect population growth with available population projections.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

**No Impact (b-c).** The Project Site portion of the Unified Development Site is currently undeveloped aside from an existing covered pedestrian walkway. Thus, the Project would not result in the demolition of any existing housing units. Since no existing housing would be displaced, there would be no need for the construction of replacement housing elsewhere. Additionally, the Project would provide 781 new residential units to the Unified Development Site. As no impacts would occur, no mitigation measures are required and further analysis of this topic in an EIR is not necessary.

#### **XIV. PUBLIC SERVICES**

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

- a. Fire protection?**

**Potentially Significant Impact.** The LAFD provides fire protection and emergency medical services in the City of Los Angeles. LAFD Fire Stations within proximity to the Project include LAFD Fire Station #11 at 1819 W. 7th Street (0.7 miles west-northwest); LAFD Fire Station #10 at 1335 S. Olive Street (0.8 miles south); LAFD Fire Station #9 at 430 East 7<sup>th</sup> Street (1.0 mile east); LAFD Fire Station #3 at 108 North Fremont Avenue (0.8 miles north-northeast); LAFD Fire Station #13 at 2401 W. Pico Boulevard (1.5 miles west); and LAFD Fire Station #4 at 450 East Temple Street (1.5 miles east).

Because the Project would increase the developed floor area and construct a new high-rise building on the Unified Development Site, and introduce an increased number of residents, residential guests, commercial patrons, and employees to the Unified Development Site, it could result in a greater demand on LAFD fire protection and emergency medical services would be generated, and there is potential for impacts on emergency response times. Further evaluation is needed to determine the Project's potential to impact LAFD fire protection and emergency medical services and emergency response times in the Project area.

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

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

**b. Police protection?**

**Potentially Significant Impact.** The Los Angeles Police Department (LAPD) provides police protection services in the City of Los Angeles. The nearest LAPD Station is the LAPD Central Community Police Station located at 251 E. 6<sup>th</sup> Street which is located approximately 0.9-miles east of the Unified Development Site.

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

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

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

**c. Schools?**

**Potentially Significant Impact.** The Unified Development Site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD), and specifically within LAUSD Local District 2. The Unified Development Site is within the attendance boundaries of 10<sup>th</sup> Street Elementary School, John H Liechty Middle School, and within the LAUSD Belmont Zone of Choice with multiple high school options, including Belmont High School, the Contreras Learning Center, the Ramon C. Cortines School of Visual & Performing Arts, and the Edward R. Roybal Learning Center. These schools are currently operating on a single-track calendar, whereby instruction generally begins in mid-August and continues through early June. Since the Project would introduce up to 781 new residential uses to the Unified Development Site, it would generate additional students in the area which could result in adverse impacts on LAUSD schools and educational facilities. Further evaluation is needed to determine the Project's potential to have an impact on school facilities and services in the Project area. Therefore, it is recommended that potential impacts associated with school services be analyzed further in an EIR.

**d. Parks?**

**Potentially Significant Impact.** Because the Project would introduce new residents to the Unified Development Site and new employees that might visit nearby parks, greater demand on existing public recreational and park facilities and services would be generated. The Project would provide on-site open space including the public outdoor plaza, the Residential Amenity Level, landscaped outdoor terraces at street grade levels, as well as recreational facilities for Project residents and their guests. The public plaza would incorporate special landscape features, seating, and the potential for public art displays. The main Residential Amenity Level would feature open areas for recreational activities, a pool, turf areas, outdoor seating areas, and quiet/passive planted areas with shaded zones. In addition, an approximately 1,000-square-foot community room would be provided within one of the Residential Tower's upper levels. The Residential Amenity Level would be finished with concrete pavers, turf, and landscaping. Additional private open space for project residents would also be provided by private balconies. These facilities would reduce the Project's demand for use of existing public recreational and park facilities. Nevertheless, it is recommended that potential residual impacts on park services in the Project area be analyzed further in an EIR.

**e. Other public facilities?**

**Potentially Significant Impact.** The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. The nearest library to the Unified Development Site is the LAPL Central Library located at 630 W. 5<sup>th</sup> Street (0.3 miles northeast). Other nearby libraries include the LAPL Little Tokyo Branch Library located at 203 S. Los Angeles Street (1.0 mile east) and the LAPL Pico Union Branch Library located at 1030 S. Alvarado Street (1.0 mile west). Because the Project would introduce new residents to the Unified Development Site, greater demand on LAPL library services would be generated. Therefore, it is recommended that potential impacts associated with library services be analyzed further in an EIR.

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

## **XV. RECREATION**

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

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

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

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

## **XVI. TRANSPORTATION/TRAFFIC**

*Would the project:*

**a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation**

**system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

**Potentially Significant Impact.** The Project proposes to construct a mixed-use development consisting of 781 units and up to 6,700 square feet of commercial (retail/restaurant) space. These uses would add vehicle trips to local and regional transportation systems. As such, operation of the Project could adversely affect the existing capacity of the street system or exceed an established standard. Construction of the Project would also result in a temporary increase in traffic due to construction-related truck trips and worker vehicle trips. Therefore, traffic impacts during construction could also adversely affect the street system. In addition, implementation of the Project could have potential effects, both temporary and permanent, on pedestrian access/sidewalks, bicycle lanes and bike routes, and public transit services and facilities in the Project vicinity. As the Project's increase in vehicle trips would have the potential to result in a significant traffic and transportation impact, it is recommended that this topic be analyzed further in an EIR.

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

**Potentially Significant Impact.** The congestion management program (CMP) is a State-mandated program enacted by the State legislature to address the impacts that urban congestion has on local communities and the region as a whole. Metro is the local agency responsible for implementing the requirements of the CMP. New projects located in the City of Los Angeles must comply with the requirements set forth in the Metro's CMP. The Project would generate vehicle trips which could potentially add trips to a freeway segment or CMP intersection. As such, it is recommended that this topic be analyzed further in an EIR.

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

**Less Than Significant Impact.** As discussed in Checklist Question VIII(e) above, the three nearest airports are Hawthorn Municipal Airport, Santa Monica Municipal Airport, and Los Angeles International Airport, which are located approximately 9, 11 and 10 miles southwest of the Unified Development Site, respectively. The Project is within the cluster of high-rise towers that comprise the downtown area of Los Angeles. As such, the Project is not anticipated to alter air traffic patterns or affect the utilization of navigable air space. Further, to ensure the safety of residents from localized aircraft (e.g., helicopters), the Project would be subject to the Federal Aviation Administration's (FAA) Federal Aviation Regulations Part 77, Objects Affecting Navigable Airspace. These regulations ensure air safety by regulating construction or alteration of buildings or structures that may affect navigable airspace, and apply to buildings with a height of over 200 feet above ground level. The Project would result in the development of a single tower on the site that would be up to 695 feet above grade. In accordance with FAA regulations, and similar to other downtown high-rise buildings, the Project would be required to notify the FAA of the building's location and height, and install flashing beacons and/or steady burning lights to demarcate the building's location to aircraft. As such, the Project would not result in a change in air traffic patterns including, increases in traffic levels or changes in location that would result in substantial safety risks. As a less than significant impact would occur, further analysis of this topic is not necessary, and no mitigation measures are required.

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

**Potentially Significant Impact.** The Project would not alter the overall existing street pattern in the vicinity, aside from minor modifications to the intersection of Francisco Street and W. 8<sup>th</sup> Street at the Project's southern frontage, and there are no existing hazardous design features such as sharp curves or dangerous intersections on-site or within the Project vicinity. However, Project construction may require temporary lane or sidewalk closures, and the Project would alter the way vehicles ingress and egress the Unified Development Site, and would result in increased trip generation and driveway use compared to existing on-site uses. Further, pedestrian activity tends to be high in the Project vicinity, particularly during events at the Los Angeles Convention Center, Staples Center, and LA LIVE located approximately two blocks south of the Unified Development Site. While the Project does not include any hazardous design features such as sharp curves or dangerous intersections, or propose any hazardous or incompatible uses, it is recommended that this topic be analyzed further in an EIR.

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

**Potentially Significant Impact.** Vehicular access to the Project Site is provided via W. 8<sup>th</sup> Street and W. 7<sup>th</sup> Street, both of which border the Unified Development Site. While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect emergency access on segments of adjacent streets during certain periods of the day. In addition, the Project would alter the way vehicles ingress and egress the Unified Development Site, and generate traffic in the Project vicinity and would result in some modifications to access from the streets that surround the Unified Development Site. Thus, it is recommended that this topic be analyzed further in an EIR.

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

**Potentially Significant Impact.** The Unified Development Site is well served by public transportation and has the potential to improve the pedestrian experience through the provision of active uses, open space, and connections to existing and proposed plaza areas that would support connectivity between the Project and destinations in the surrounding area. Further, the Project is not expected to interfere with or degrade the performance or safety of public transit, bicycle, or pedestrian facilities. However, the Project would alter access to the Project Site from existing conditions which could affect pedestrian and bicycle travel routes during Project construction and/or operation, and would introduce new residential units and employment opportunities at the Unified Development Site which would increase the demand for public transit during Project operation. Therefore, a potentially significant impact would occur, and it is recommended that this issue be analyzed further in an EIR.

## XVII. TRIBAL CULTURAL RESOURCES

*Would the project:*

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

**Potentially Significant Impact.** In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. As noted above, the Project would require excavations to previously undisturbed depths. As such, 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. Therefore, it is recommended that this issue be analyzed further in an EIR.

## XVIII. UTILITIES AND SERVICE SYSTEMS

*Would the project:*

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

**Potentially Significant Impact.** The City of Los Angeles Department of Public Works (LADPW) provides wastewater services for the Unified Development Site. Any wastewater that would be generated by the Project would be treated at the Hyperion Treatment Plant (HTP). The HTP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). The HTP is designed to treat 450 million gallons per day (mgd) HTP has an average dry weather flow of approximately 275 mgd, leaving approximately 175 mgd of capacity available.<sup>41</sup> The discharge of effluent from the HTP into Santa Monica Bay is regulated by the HTP's NPDES Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board (RWQCB)'s requirements for a recreational beneficial use. The Project would result in new sources of wastewater generated at the Unified Development Site with the development of the new residential and commercial uses along with related amenity facilities and open space. The incremental quantity of wastewater generated by

<sup>41</sup> *The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily dry weather flow of 275 mgd, and peak wet weather flow of 800 mgd. (Information regarding wastewater flows is provided by the City of Los Angeles Bureau of Sanitation website available at: [https://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?\\_afLoop=4145620783237454&\\_afWindowMode=0&\\_afWindowId=1c2w2xbhlx\\_198#!%40%40%3F\\_afWindowId%3D1c2w2xbhlx\\_198%26\\_afLoop%3D4145620783237454%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D1c2w2xbhlx\\_258](https://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?_afLoop=4145620783237454&_afWindowMode=0&_afWindowId=1c2w2xbhlx_198#!%40%40%3F_afWindowId%3D1c2w2xbhlx_198%26_afLoop%3D4145620783237454%26_afWindowMode%3D0%26_adf.ctrl-state%3D1c2w2xbhlx_258). Accessed May 11, 2017)*

the Project could potentially result in impacts with respect to wastewater treatment. Therefore, it is recommended that this issue be analyzed further in an EIR.

**b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Potentially Significant Impact.** The Project would result in new sources of wastewater generated at the Unified Development Site with the development of the new residential and commercial uses, along with related amenity facilities and open space. The incremental quantity of wastewater generated by the Project could potentially result in impacts with respect to wastewater treatment. Therefore, it is recommended that this issue be analyzed further in an EIR.

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

**Potentially Significant Impact.** As discussed in Checklist Question IX(e) above, the existing on-site improvements were constructed prior to the City's LID requirements, which require the Project to treat and infiltrate the first-flush runoff from the Unified Development Site. As a result, with implementation of the Project's BMP's in accordance with the City's LID Ordinance and SUSMP, first-flush stormwater flows from the Unified Development Site would be reduced when compared to existing conditions and the Project would not be expected to adversely affect local drainage systems. The Project discharge would continue to flow into existing catch basins along W. 8<sup>th</sup> Street and/or S. Figueroa Street, ultimately discharging to the RCP storm drains along Francisco Street. There is currently no known deficiency in the stormwater system serving the Project vicinity. The applicant would be responsible for providing the necessary storm drain infrastructure to serve the Unified Development Site, as well as any extensions to the existing system in the area. Nonetheless, the incremental quantity of stormwater generated by the Project, particularly within the currently undeveloped Project Site, could potentially result in impacts with respect to storm drain capacity. Therefore, it is recommended that this issue be analyzed further in an EIR.

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

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

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

**Potentially Significant Impact.** The Unified Development Site is currently served by existing City of Los Angeles sewers within W. 8<sup>th</sup> Street, S. Figueroa Street, and W. 7<sup>th</sup> Street. Given the increased development that would occur on the Unified Development Site, the Project would result in an increase in wastewater generation beyond existing conditions. Therefore, it is recommended that this issue be analyzed further in an EIR.

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

**Less Than Significant Impact.** Solid waste management in the City of Los Angeles includes both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The Los Angeles Bureau of Sanitation (BOS) is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at in-County landfills.

In December 2016, the County of Los Angeles Department of Public Works released the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) 2015 Annual Report (the most recent available).<sup>42</sup> As indicated therein, the remaining disposal capacity for the County's Class III landfills is estimated at approximately 114.3 million tons as of December 31, 2015. In addition to in-County landfills, out-of-County disposal facilities are also available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the CoIWMP, the County anticipates that future Class III disposal needs can be adequately met through 2030 through some combination of the following strategies (Scenarios II through VII of the 2015 Annual Report): supporting and increasing exportation of waste to out-of-County facilities, meeting CalRecycle's Statewide disposal target of 2.7 pounds per day, create additional alternative technology capacity, and utilizing waste-by-Rail capacity to export to Out-of-County landfills.

### Construction Impacts

Project construction would require earthwork (grading and excavation) and the new construction of a mixed-use building within the Project Site. Each of these activities would generate demolition waste including but not limited to soil, asphalt, wood, paper, glass, plastic, and metals. As shown in **Table B-2, Project Construction Debris**, Project construction would generate an estimated 1,812 tons of debris. As discussed in Attachment A, Project Description, of this Initial Study, excavation of the Project Site would generate an estimated 227,500 cubic yards of soil export.

<sup>42</sup> County of Los Angeles Department of Public Works, *Countywide Integrated Waste Management Plan: 2016 Annual Report*. December 2016. Available at: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>. Accessed May 12, 2017.

Construction materials are planned to be disposed of at one of the unclassified (e.g., inert) landfills available to the City of Los Angeles. Cal Arrow Enterprises in Irwindale being the anticipated disposal site for the Project, which has an annual permitted capacity of 1.4 million cubic yards.<sup>43</sup> As a result, the total 227,500 cubic yards of soil disposal resulting from Project excavation and construction would be within the permitted annual capacity of the Cal Arrow Enterprises inert waste landfill (approximately 16 percent), and construction waste would not exceed the existing capacity of this facility. In addition, the estimate of construction and demolition debris is conservative in that it does not take into account recycling efforts that would occur in accordance with City regulations. These regulations require the applicant to contract with a waste disposal company that recycles construction and/or demolition debris, as well as to provide temporary waste separation bins during project construction. On March 5, 2010, the City Council approved the Construction and Demolition Waste Recycling Ordinance, which requires all mixed construction and demolition generated within City limits be taken to City-certified construction and demolition waste processors. This recycling policy is effective January 1, 2011, and as of April 2017, the construction and demolition waste diversion rates for the City's certified processors ranged between 70 and over 86 percent.<sup>44</sup> However, assuming Project construction would achieve a minimum 50 percent diversion rate, as required by Assembly Bill 939<sup>45</sup>, construction debris requiring landfill disposal would be reduced to a total of approximately 906 tons (or 755 cubic yards). This constitutes a fraction (approximately 0.05 percent) of the permitted annual capacity of the Cal Arrow Enterprises facility. Because construction waste would not exceed the capacity of existing disposal facilities and would be further reduced by recycling, impacts would be less than significant. No mitigation measures are required and no further analysis of this topic in an EIR is necessary.

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<sup>43</sup> CalRecycle. *Solid Waste Information System (SWIS). Facility/Site Summary Details: Cal Arrow Enterprises, Inc. (19-AA-1074)*. Available at: <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-1074/Detail/>. Accessed June 28, 2017.

<sup>44</sup> City of Los Angeles, Department Bureau of Sanitation. *Construction & Demolition Recycling – Citywide Construction and Demolition (C and D) Waste Recycling Ordinance*. Available at: [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?\\_adf.ctrl-state=1c2w2xbhlx\\_555&\\_afLoop=4148470886335303#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_adf.ctrl-state=1c2w2xbhlx_555&_afLoop=4148470886335303#!). Accessed May 12, 2017.

<sup>45</sup> *Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (Assembly Bill 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 requires each city or county plan to include an implementation schedule which shows diversion of 50 percent of all solid waste by January 1, 2000.*

Table B-2

## Project Construction Debris

Land Use	Size	Generation Rate	Total Solid Waste Generation (lbs)	Total Solid Waste Generation (tons)
<b>Demolition</b>				
Pedestrian Walkway	5,000 sf	2,400 lbs per cy <sup>b</sup>	148,080 lbs	74 tons
<b>Construction</b>				
Mixed-Use Development	791,843 sf	4.39 lbs per sf <sup>c</sup>	3,476,191 lbs	1,738 tons
<b>Total Solid Waste Generated During Project Construction</b>			<b>3,624,271 lbs</b>	<b>1,812 tons</b>
<b>Total Solid Waste With Diversion Efforts (50 percent)</b>			<b>1,812,135 lbs</b>	<b>906 tons</b>
<b>Soil Export (cubic yards)</b>				<b>227,500 cy<sup>d</sup></b>

<sup>a</sup> CalEEMod User's Guide, Appendix A, p. 12, July 2013.

<sup>b</sup> Assumes concrete paving is 4 inches deep. 5,000 sf of concrete paving area at 4 inches of depth = 61.7 cy

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

<sup>d</sup> KPFF, May 2017

Source: ESA PCR, May 2017.

## Operational Impacts

Estimated operational solid waste generation for the Project is shown in **Table B-3, Estimated Operational Solid Waste Generation**. It is estimated that the total waste generation for the Project would be approximately 1,749 tons per year, or 4.79 tons per day. The daily amount of solid waste generated by the Project would represent a negligible amount (0.05 percent) of the daily solid waste disposed of by the City (10,460 tons).<sup>46</sup> It is important to note that this estimate is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on successful City implementation of AB 939 and the City's objective to achieve a 70 percent diversion goal by 2020 and eventually to a rate of 90 percent or more by 2025 as envisioned in the Los Angeles Solid Waste Integrated Resources Plan.<sup>47</sup> Recycling efforts in the City of Los Angeles in accordance with AB 939 achieved a solid waste diversion rate of 76.4 percent in 2011, the most recent year data is available.<sup>48</sup> Assuming the Project would achieve a similar diversion rate, the amount of Project solid waste that would need to be landfilled would be reduced to an estimated 413 tons annually, or 1.13 tons per day, which constitutes a negligible portion (less than 0.01 percent) of the daily permitted intake

<sup>46</sup> County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan: 2015 Annual Report. December 2016. Figure 4, Page 26.

<sup>47</sup> City of Los Angeles Bureau of Sanitation, City of Los Angeles Solid Waste Integrated Resources Plan – A Zero Waste Master Plan. October 2013. Page ES-1. Available at: <https://www.lacitysan.org/san/sandocview?docname=cnt012522>. Accessed May 12, 2017.

<sup>48</sup> Ibid, pg. 10.

Table B-3

## Estimated Operational Solid Waste Generation

Land Use	Size	Generation Rate (lbs/unit/day) <sup>a</sup>	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Residential	781 units	12.23 lbs/unit/day	9,552 lbs	1,743 tons
Retail/Restaurant	6,700 sf	5 lbs/1,000 sq. ft./day	34 lbs	6 tons
<b>Total</b>			<b>9,586 lbs</b>	<b>1,749 tons</b>

<sup>a</sup> Generation factors provided by the CalRecycle website: *Estimated Solid Waste Generation Rates*.  
<http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm>. Accessed May 12, 2017.

Source: ESA PCR, May 2017

(28,549 tons) and remaining capacity (114 million tons) of in-County landfills and waste-to-energy facilities serving the City.<sup>49</sup>

As described in the CoIWMP 2015 Annual Report, future disposal needs for the 15-year planning horizon (2030) would be adequately met through the use of in-County and out-of-County facilities. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time for the County to address any future shortfalls in landfill capacity.

Based on the above, Project-generated waste would not exacerbate the estimated landfill capacity requirements addressed for the 15-year planning period ending in 2030, or alter the ability of the County to address landfill needs via existing capacity and other options for increasing capacity. Therefore, impacts on solid waste disposal from Project operations would be less than significant.

In summary, the County's inert and Class III landfills would have adequate capacity to accommodate Project-generated construction and demolition waste during Project construction and Class III solid waste generation during Project operations. Thus, construction and operation impacts relative to solid waste would be less than significant. No mitigation measures are required and no further analysis of this topic in an EIR is necessary.

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

**Less Than Significant Impact.** Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. Additionally, the City is currently implementing its "Zero-Waste-to-Landfill" goal to achieve a diversion rate of 90 percent or more in waste sent to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. Recycling efforts in the City of Los

<sup>49</sup> County of Los Angeles Department of Public Works, *Countywide Integrated Waste Management Plan: 2015 Annual Report*. Appendix E-2 Table 1: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County. December 2016.

Angeles in accordance with AB 939 achieved a solid waste diversion rate of 76.4 percent in 2011, the most recent year data is available.<sup>50</sup>

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-site.<sup>51</sup> Further, the Project would comply with the City's Construction and Demolition Waste Recycling Ordinance. The Project would also promote compliance with AB 939 and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is necessary.

## **XIX. MANDATORY FINDINGS OF SIGNIFICANCE**

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

**Potentially Significant Impact.** As discussed previously in Checklist Question IV, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed within this Initial Study, the Project could result in environmental impacts that have the potential to degrade the quality of environment as addressed herein. Potentially affected resources include Aesthetics (Views, Visual Character, Light and Glare, and Shade and Shadow), Air Quality, Cultural Resources (Historical, Archaeological, and Paleontological Resources), Geology and Soils (Strong Seismic Ground Shaking, Unstable Geologic Units, and Expansive Soils), GHG Emissions, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Schools, Parks, and Libraries), Recreation, Transportation/Circulation (Traffic, Access, Design Features/Safety), and Utilities (Water, Wastewater, Storm Drains, and Energy). An EIR will be prepared to analyze and document these potentially significant impacts. It should be noted that pursuant to Senate Bill 743 (SB 743) a project's aesthetic and parking impacts are no longer considered significant impacts on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. As the Project meets these criteria, parking impacts of the Project will not be evaluated in the project specific EIR.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable**

<sup>50</sup> City of Los Angeles Bureau of Sanitation, *City of Los Angeles Solid Waste Integrated Resources Plan – A Zero Waste Master Plan*, October 2013. Page 10. Available at: <https://www.lacitysan.org/san/sandocview?docname=cnt012522>. Accessed May 12, 2017.

<sup>51</sup> Ordinance No. 171,687 adopted by the Los Angeles City Council on August 6, 1997.

**when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

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

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

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

With respect to hazards and hazardous materials, such impacts are Unified Development Site-specific and are assessed on a project-by-project basis. No projects sited on or near listed hazardous materials sites are located immediately adjacent to the Unified Development Site. As such, cumulative hazards and hazardous materials impacts resulting from the Project and other related projects would not occur. Additionally, the Unified Development Site is not located in a wildfire hazard zone and thus the Project would not contribute to cumulative wildfire hazard impacts in the area. All projects in the City of Los Angeles would be subject to Federal, State, and local regulations regarding the use, handling, transport, and/or disposal of hazardous materials, which would limit the potential for cumulative effects in this regard. Thus, cumulative impacts related to hazards and hazardous materials would be less than significant.

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

With respect to solid waste disposal the provision of these services is regional in nature. As indicated in the corresponding Initial Study Checklist sections above, the service providers have prepared forecasts of regional demand for these utilities and their ability to meet future demand. These are incorporated into the respective

service providers' plans and strategies for meeting future needs. Utility provider plans are updated periodically to identify emerging shortfalls in service capacity not previously anticipated and develop strategies to accommodate any shortfalls. The plans address expected growth, which anticipates projected development within the service areas. The information contained in this Initial Study concerning the ability of these service providers to meet the Project's needs supports the determination that future demand for solid waste disposal can be met for new growth and development, including the Project. Therefore, the Project is not expected to result in cumulatively considerable contributions to cumulatively significant impacts as the result of solid waste disposal.

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

**Potentially Significant Impact.** As discussed throughout this Initial Study, the Project could result in potentially significant environmental impacts associated with Aesthetics (Views, Visual Character, Light and Glare, and Shade and Shadow), Air Quality, Cultural Resources (Historical, Archaeological, and Paleontological Resources), Geology and Soils (Strong Seismic Ground Shaking, Unstable Geologic Units, and Expansive Soils), GHG Emissions, Land Use and Planning, Noise, Population and Housing, Public Services (Fire, Police, Parks, Schools, and Libraries), Recreation, Transportation/Circulation (Traffic, Access, and Design Features/Safety), and Utilities (Water, Wastewater, Storm Drains, and Energy). In addition, as required by Appendix F of the State CEQA Guidelines, an evaluation of the Project's potential effects on energy resources and energy conservation is also necessary in an EIR, and as such this topic is recommended to be addressed in the Utilities section, as indicated above. These impacts could have potentially adverse effects on human beings, and further analysis of these impacts is recommended in an EIR.