



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

# INITIAL STUDY

## **Figueroa Centre Project**

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**Case Number:** ENV-2017-174-EIR

**Project Address:** 913 South Figueroa Street, Los Angeles, California 90015

**Community Plan Area:** Central City

**Council District:** 14—José Huizar

**Project Description:** The Project is a new mixed-use high-rise tower with 220 hotel guest rooms, 22,766 square feet of meeting rooms and ballrooms, up to 200 residential condominium units, and 94,080 square feet of commercial floor area comprised of 44,080 square feet of retail uses and 50,000 square feet of restaurants. The Project would provide 617 vehicle parking spaces within three subterranean parking levels and eight partial, above-grade levels. The proposed uses would be located within a 66-story tower including a nine-story podium, with a maximum height of 975 feet. Upon completion, the Project would include 984,940 square feet of floor area.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

Eyestone Environmental

**APPLICANT:**

Regalian, LLC

**July 2017**

# Table of Contents

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	<u>Page</u>
INITIAL STUDY AND APPENDIX G CHECKLIST .....	1
ATTACHMENT A: PROJECT DESCRIPTION .....	A-1
ATTACHMENT B: EXPLANATION OF CHECKLIST DETERMINATIONS .....	B-1

## APPENDICES

Appendix IS-1	Location of Project Site within Transit Priority Area
Appendix IS-2	Shadow Diagrams
Appendix IS-3	Geotechnical Evaluation
Appendix IS-4	Phase I ESA
Appendix IS-5	Water Resources Report
Appendix IS-6	Utility Report

# List of Figures

---

<u>Figure</u>		<u>Page</u>
A-1	Project Location Map .....	A-2
A-2	Aerial Photograph of the Project Vicinity .....	A-4
A-3	Program Diagram .....	A-6
A-4	Conceptual Rendering .....	A-8
A-5	Conceptual Rendering .....	A-9

# List of Tables

---

<u>Table</u>		<u>Page</u>
A-1	Summary of Proposed Floor Area .....	A-7
B-1	Estimated Project Wastewater Generation .....	B-51
B-2	Project Demolition and Construction Waste Generation .....	B-56
B-3	Estimated Project Solid Waste Generation .....	B-57



# CITY OF LOS ANGELES

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

## CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND APPENDIX G CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	14	July 2017

### RESPONSIBLE AGENCIES

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

PROJECT TITLE/NO.	CASE NO.
Figueroa Centre	ENV-2017-174-EIR

### PROJECT LOCATION:

913 South Figueroa Street, Los Angeles, CA 90015

APPLICANT NAME AND ADDRESS	PHONE NUMBER
Regalian, LLC 900 West Olympic Blvd, Suite 32H, Los Angeles, CA 90015	310-733-9966

### PROJECT DESCRIPTION:

The Project is a new mixed-use high-rise tower with 220 hotel guest rooms, 22,766 square feet of meeting rooms and ballrooms, up to 200 residential condominium units, and 94,080 square feet of commercial floor area comprised of 44,080 square feet of retail uses and 50,000 square feet of restaurants. The Project would provide 617 vehicle parking spaces within three subterranean parking levels and eight partial, above-grade levels. The proposed uses would be located within a 66-story tower including a nine-story podium, with a maximum height of 975 feet. Upon completion, the Project would include 984,940 square feet of floor area.

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

### ENVIRONMENTAL SETTING:

The Project Site is located at 913 South Figueroa Street in the Central City Community Plan area of the City of Los Angeles. Primary regional access is provided by State Route 110 (SR-110 or Harbor Freeway), which runs north-south approximately 900 feet west of the Project Site. The Project Site is specifically bounded by James M. Wood Boulevard to the north, Figueroa Street to the east, Hotel Figueroa to the south, and the alley Cottage Place to the west. Major arterials providing regional access to the Project vicinity include Figueroa Street and Olympic Boulevard. In addition, the Metro 7th Street/Metro Center Station is located approximately 0.3 mile north of the Project Site and provides access to Metro Red, Blue, Purple, and Expo lines. Additionally, the Metro Pico Station serving the Blue and Expo lines is located approximately 0.4 mile southwest of the Project Site.

Please refer to Attachment A for a more detailed description of the Project's environmental setting.

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**SURROUNDING LAND USES:**

The Project Site is located in a highly urbanized area characterized by commercial development and high density residential development. Immediately south of the Project Site is L.A. LIVE, an entertainment, hotel, and residential complex. Immediately west of the Project Site are buildings occupied by the Salvation Army, the Marriott Residence Inn, and Courtyard by Marriott. The block north of the Project Site includes the Original Pantry Café. East of the Project Site is the 30-story Apex Building and the 26-story Olympic Apartments, both of which consist of ground floor commercial uses with residential units above.

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

Yes; May 18, 2017.

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**DETERMINATION (To be completed by Lead Agency)**

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**On the basis of this initial evaluation:**

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☐ 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.

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Alejandro Huerta

PRINTED NAME

SIGNATURE

City Planning Associate

TITLE

(213) 978-1454

TELEPHONE NUMBER

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**EVALUATION OF ENVIRONMENTAL IMPACTS:**

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose

sensitive receptors to pollutants based on a project-specific screening analysis).

- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

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**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**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 FOREST RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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	<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
forest land to non-forest use?				
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**V. CULTURAL RESOURCES:** Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**VI. GEOLOGY AND SOILS.** Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i.) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii.) Seismic-related ground failure, including liquefaction, caused in whole or in part by the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
project's exacerbation of the existing environmental conditions?				
iv.) Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>

**VII. GREENHOUSE GAS EMISSIONS.** Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**VIII. HAZARDS AND HAZARDOUS MATERIALS.** Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
school?				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) 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 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 caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**X. LAND USE AND PLANNING.** 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"/>

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

**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?	<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"/>

**XII. NOISE.** Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XIII. POPULATION AND HOUSING.** Would the project:

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### XIV. PUBLIC SERVICES.

- a) 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:

Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### XV. RECREATION.

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

**XVI. TRANSPORTATION/TRAFFIC.** Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**XVII. TRIBAL CULTURAL RESOURCES.**

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

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

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

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
wildlife population to drop below self-sustaining levels threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## **A. Project Description**

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# Initial Study

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## Attachment A: Project Description

### Project Summary

The Project proposes to develop a mixed-use project on an 85,317-square-foot site located within the Central City Community Plan Area of the City of Los Angeles (the Project).<sup>1</sup> The Project includes 220 hotel guest rooms, approximately 22,766 square feet of meeting rooms and ballrooms, up to 200 new residential condominium units, and approximately 94,080 square feet of new commercial floor area comprised of approximately 44,080 square feet of retail uses, and 10 restaurants totaling approximately 50,000 square feet. The proposed uses would be located within a high-rise tower and within a nine-story podium. The new building would include 66 stories with a maximum height of 975 feet. Upon completion, the Project would include approximately 984,940 square feet of floor area. Approximately 617 parking spaces would be provided within three subterranean parking levels and within portions of eight levels of the podium.

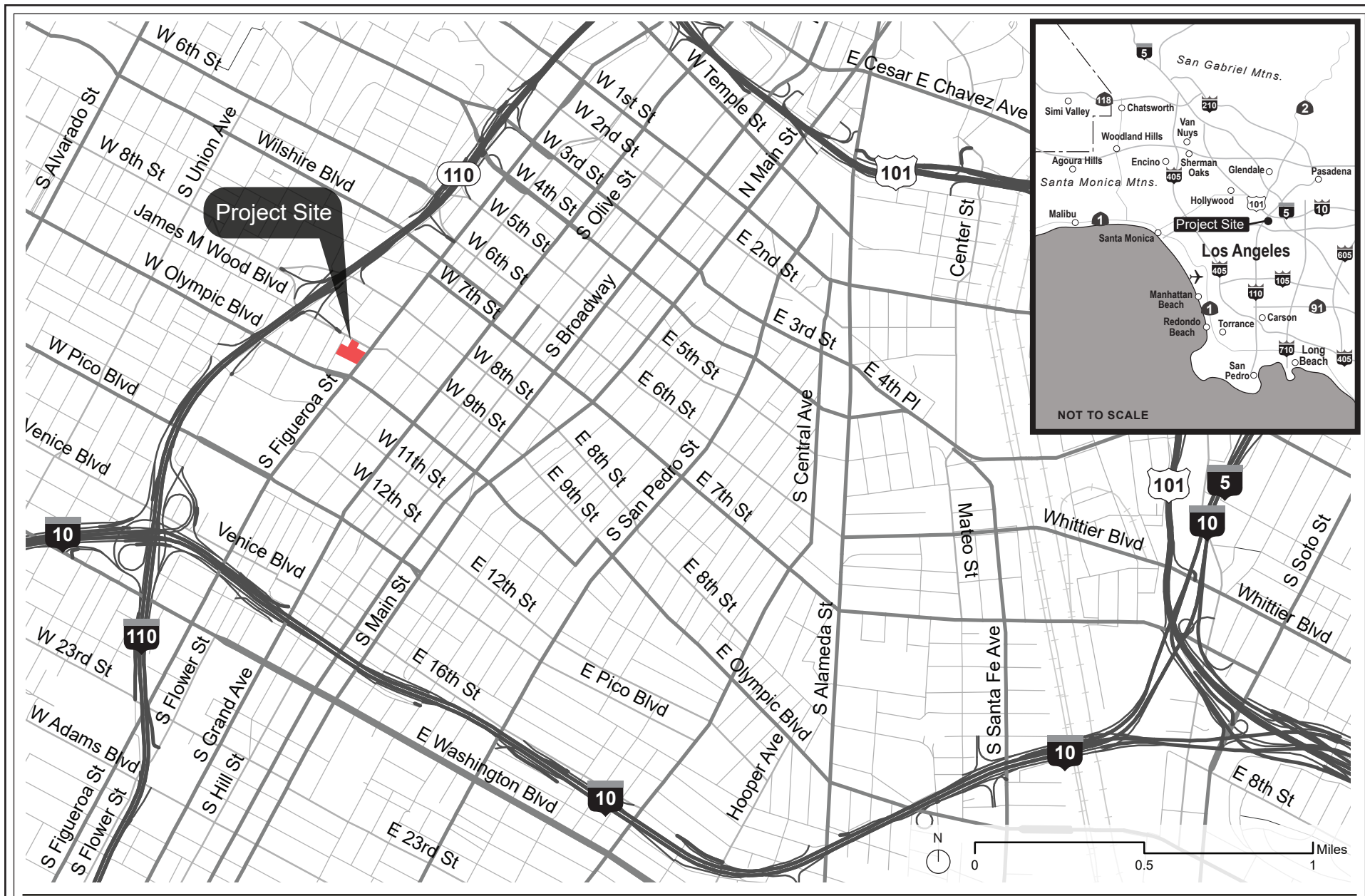
### A. Environmental Setting

#### 1. Project Location

As shown in Figure A-1, Project Location Map, on page A-2, the Project Site is located in the South Park neighborhood of downtown Los Angeles within the Central City Community Plan area. Primary regional access is provided by State Route 110 (SR-110 or Harbor Freeway), which runs north-south approximately 900 feet west of the Project Site. The Project Site is specifically bounded by James M. Wood Boulevard to the north, Figueroa Street to the east, Hotel Figueroa to the south, and the alley Cottage Place to the west. Major arterials providing regional access to the Project vicinity include Figueroa Street and Olympic Boulevard. In addition, the Metro 7th Street/Metro Center

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<sup>1</sup> The existing gross lot area of the Project Site prior to street dedications is 83,716 square feet. As part of the requested Vesting Tentative Tract Map, the Project seeks to vacate and merge 1,601 square feet of surplus City right-of-way along a portion of Figueroa Street which results in a gross lot area of 85,317 square feet. The Project requires a 5-foot dedication on James M. Wood Boulevard and requests a reduced 2-foot dedication along Cottage Place as part of the Vesting Tentative Tract Map, which results in a net lot area of 84,366 square feet. The gross lot area of 85,317, prior to street dedications, is used to calculate floor area in the Greater Downtown Housing Incentive Area.



**Figure A-1**  
Project Location

Station is located approximately 0.3 mile north of the Project Site and provides access to Metro Red, Blue, Purple, and Expo lines. Additionally, the Metro Pico Station serving the Blue and Expo lines is located approximately 0.4 mile southwest of the Project Site.

## **2. Existing Uses**

### **(a) Existing Conditions**

As shown in Figure A-2 on page A-4, the Project Site forms a “T” shape and consists of six contiguous parcels with a gross lot area of 85,317 square feet. A surface parking lot bound by a wrought-iron fence occupies the Project Site. There are two curb cuts on the Project Site, along Figueroa Street. There is also an ingress/egress point to the Project Site from Cottage Place.

The Project Site is relatively flat with limited ornamental landscaping. Three Laurel Fig trees are located along Figueroa Street. In addition, four Hybrid Strawberry Trees and a Mexican Fan Palm tree are located on the Project Site.

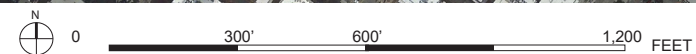
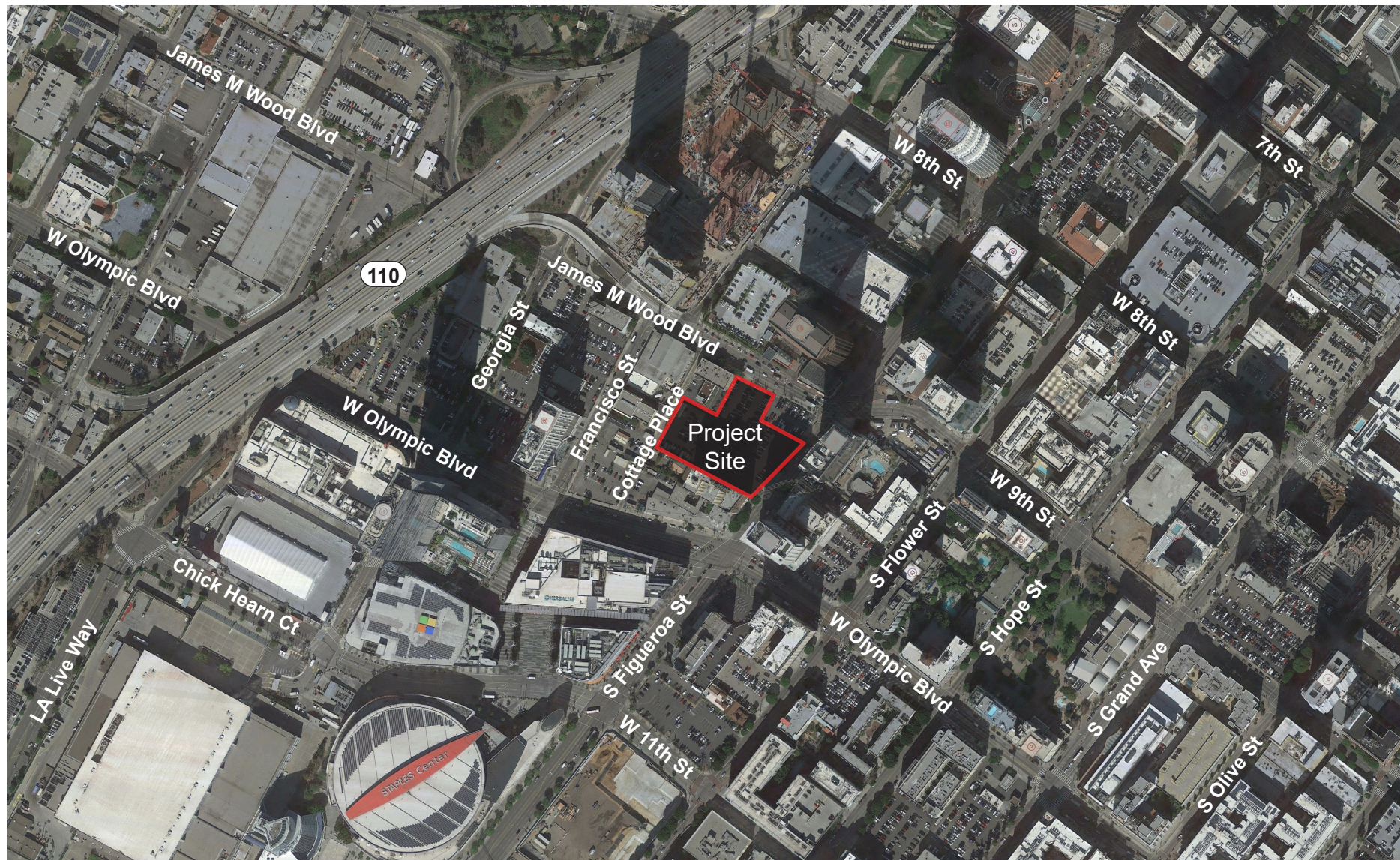
### **(b) Existing Land Use and Zoning**

The Project Site is located within the Central City Community Plan (Community Plan) area, which was last updated in January 2003. Under the Community Plan, the Project Site is designated for Regional Center Commercial uses.

The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4D). The Commercial zones permit a wide array of land uses including the Project’s proposed hotel, residential and retail uses. Height District 4D for the C zone does not limit building height, but the D limitation in the C2-4D zone limits the Floor Area Ratio (FAR) to 6:1. As discussed below in Section g., FAR, additional FAR up to 13:1 may be permitted through the City’s Transfer of Floor Area provisions set forth in the Los Angeles Municipal Code (LAMC) and the City Center Redevelopment Plan.

The Site is also located within the Greater Downtown Housing Incentive Area, the Central City and Downtown parking districts, and the Los Angeles Sports and Entertainment District (LASED) Streetscape Plan area which applies to Figueroa Street. The Project is also subject to compliance with the standards and guidelines set forth in the Downtown Design Guide. The Project Site is also freeway proximate and located within a transit priority area as defined by Senate Bill (SB) 743 and City Zoning Information File (ZI) 2452.





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



### **3. Surrounding Land Uses**

As shown in Figure A-2 on page A-4, the Project Site is located in a highly urbanized area that includes commercial and residential uses. On the Project Site block are a two-story building used for emergency housing (Zahn Memorial Center) to the west along James M. Wood Boulevard, a surface parking lot at the southwest corner of James M. Wood Boulevard and Figueroa Street for the Pantry Café, and the Hotel Figueroa to the south. A proposed 57-story mixed-use tower is proposed south of the Hotel Figueroa at the corner of Olympic Boulevard and Figueroa Street.

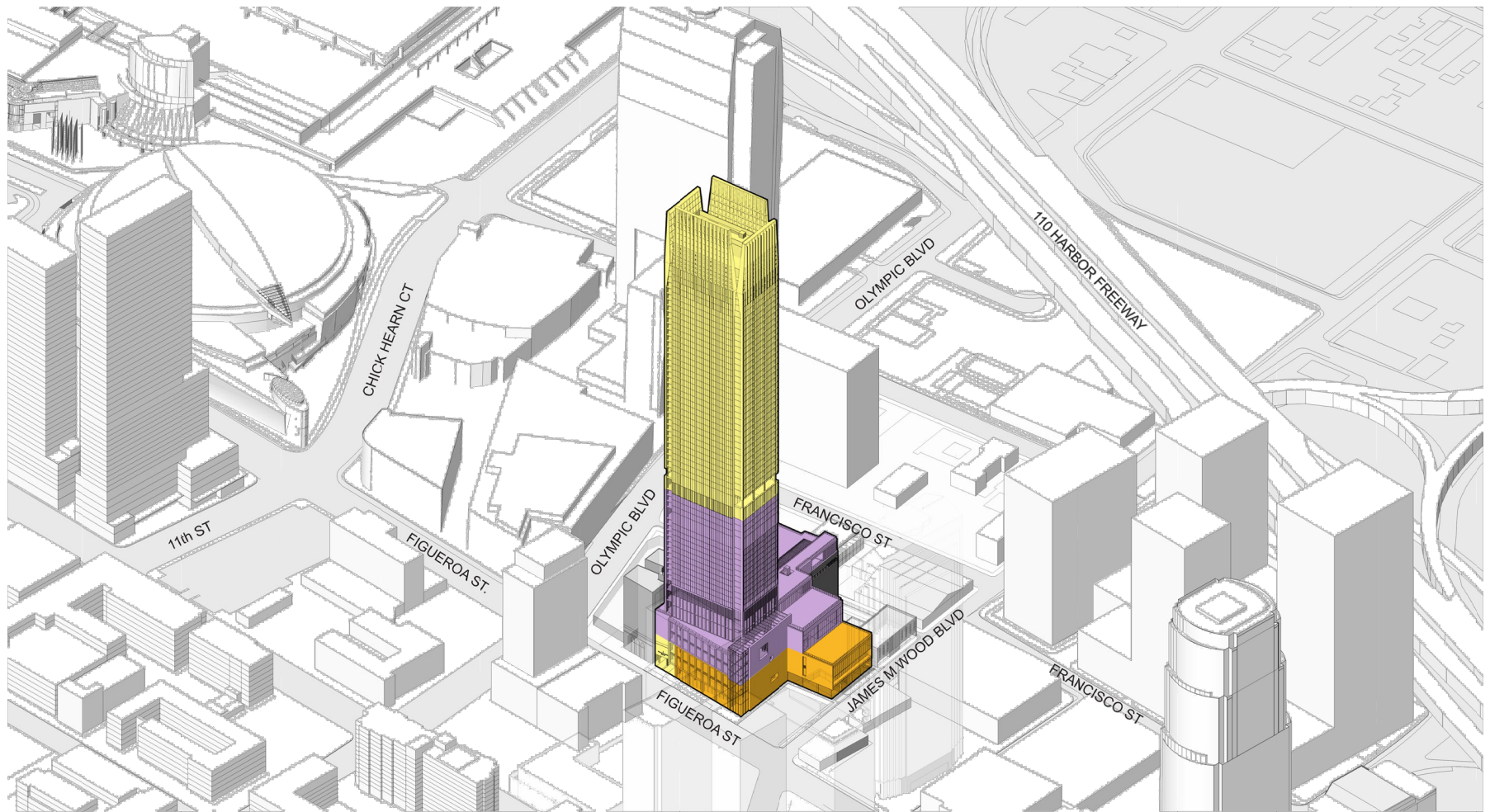
Immediately south of the Project Site is L.A. LIVE, which includes the Microsoft Theater, JW Marriott hotel, Ritz-Carlton hotel and Residences, Regal Cinemas, the GRAMMY Museum, Microsoft Square, various restaurants and offices and parking garages. Immediately west of the Cottage Place alley are the Zahn Memorial Center, the Marriott Residence Inn, and Courtyard by Marriott. The block north of the Project Site includes the Original Pantry Café. The block northwest of the Project Site includes the 6.3-acre Metropolis development which consists of four towers up to 40 stories in height, 70,000 square feet of retail uses, 1,500 residential condominiums, and a 350-room hotel. East of the Project Site is the 30-story Apex Building and the 26-story 717 Olympic Apartments, both of which consist of ground floor commercial uses including a bank and retail shops with residential units above.

## **B. Description of the Project**

### **1. Project Overview**

The Applicant proposes to develop a mixed-use project on an 85,317-square-foot site located in downtown Los Angeles. As described in more detail below and shown in Figure A-3, Program Diagram, on page A-6, the Project would provide 220 hotel guest rooms, up to 200 new residential condominium units, and approximately 94,080 square feet of new commercial spaces anticipated to be comprised of approximately 44,080 square feet of retail uses, and 50,000 square feet of restaurant uses. Additionally, the Project would provide 617 vehicle parking spaces within three subterranean parking levels (Levels B3 through B1) and portions of eight above-grade levels (Levels 2 through 9) in a podium. The Project would also provide 360 bicycle parking spaces (270 long-term and 90 short-term spaces) throughout the Project Site.

As shown in Table A-1 on page A-7, the residential uses would comprise approximately 535,588 square feet, the hotel uses would comprise approximately 355,272 square feet, and the commercial uses would comprise approximately 94,080 square feet for a total of 984,940 square feet of floor area. The FAR for the Project would be 11.54:1.



**KEY**

<span style="display: inline-block; width: 15px; height: 10px; background-color: yellow; border: 1px solid black;"></span>	<b>RESIDENTIAL</b> 535,588 SQ FT
<span style="display: inline-block; width: 15px; height: 10px; background-color: purple; border: 1px solid black;"></span>	<b>HOTEL</b> 355,272 SQ FT
<span style="display: inline-block; width: 15px; height: 10px; background-color: orange; border: 1px solid black;"></span>	<b>COMMERCIAL</b> 94,080 SQ FT

**Figure A-3**  
Program Diagram

**Table A-1**  
**Summary of Proposed Floor Area<sup>a</sup>**

Land Use	Floor Area (sf)
Residential	535,588 sf (200 du)
Hotel	355,272 sf (220 rm)
Retail	44,080 sf
Restaurant	50,000 sf
<b>Total</b>	<b>984,940 sf</b>
<hr/> <i>du = dwelling units</i> <i>rm = rooms</i> <i>sf = square feet</i> <sup>a</sup> <i>Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i> <i>Source: Regalian, LLC, 2017.</i>	

As shown in the conceptual renderings depicted in Figure A-4 and Figure A-5 on pages A-8 and A-9, the proposed uses would be located within a 66-story high-rise building. The tower would be above a nine-story podium with three subterranean parking levels located below the podium. The maximum height of the building would be approximately 975 feet above ground level.

The ground floor of the building would contain commercial space for 10 restaurants along Figueroa Street and James M. Wood Boulevard. The main residential lobby and an enclosed glass atrium with escalator access to upper retail levels and hotel meeting and ballroom amenities would also be located along Figueroa Street. The second through fifth podium levels would contain retail spaces along Figueroa Street and James M. Wood Boulevard. Hotel amenities are proposed on the sixth through ninth podium levels and would include meeting rooms, a ballroom, and an outdoor terrace on Level 6. Parking would be located to the rear of the amenity areas. The tenth level atop the podium would feature shared amenities and open space for residents and hotel guests including a pool, decks, spas, lounge areas, water features, fire pits, and gardens. This level would also include a pool bar and grill, lounge and lobby, café, residential pool house, and a restaurant with outdoor dining terrace for residential and hotel guests only. The 11th level would include a spa, fitness center, and garden. Hotel rooms and services would be dispersed on the 13th through 28th levels. The 29th level would include residential amenities for the residential condominiums on the 30th through 63rd levels. The 12th, 28th, and 64th through 66th levels would serve as mechanical transfer floors.





**Figure A-4**  
Conceptual Rendering





**Figure A-5**  
Conceptual Rendering



## **2. Building Design**

The Project would be designed in a contemporary architectural style with a combination of glass, stone, and metal building materials. Stone cladding is used extensively on the podium in contrast to the glass tower above. The hotel guestrooms rise above the podium in a rectangular tower to a resident amenity floor with outdoor terraces on Level 29. The tower features a roofline with parapets, articulated with vertical mullions that angle away from their corners, creating breaks in the façade. As discussed further in Attachment B, Explanation of Checklist Determinations, Project is designed to be consistent with the City's Downtown Design Guide and the LASED Streetscape Plan.

## **3. Open Space and Recreational Amenities**

Overall, the Project would provide 41,990 square feet of outdoor amenity open space for residents and hotel guests, exceeding the 31,700 square feet of open space required by the LAMC for the residential portion of the Project. Pursuant to LAMC requirements, 8,262 square feet of the common open space would be planted with ground cover, shrubs, or trees.

The 10th level atop the podium would include outdoor open space for residents and hotel guests that include a pool, sunning decks, spa, lounge areas, water features, fire pits, gardens, an interior lounge, and a residential pool house. The 11th level also includes a spa, fitness center, and garden. Additional resident amenity space for residents would be located on the 29th level that include outdoor terraces with views of Downtown.

The Project would provide two rows of street trees along Figueroa Street in compliance with the LASED Streetscape Plan. Accent planters and hedges would be located adjacent to abutting properties and within outdoor dining areas. New street trees would also be planted along James M. Wood Boulevard. At least 50 percent of the required trees would be canopy trees that shade open spaces along sidewalks and the building. There are eight trees within and adjacent to the Project Site that would be removed. None of the trees are of a species that is protected by the LAMC. A variety of trees, including, but not limited to, strawberry, palm, olive, laurel, and cherry trees, would be planted throughout levels 6, 10, and 11 of the Project. Overall, the Project would provide a total of 53 trees.

## **4. Signage and Lighting**

Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Additionally, Project signage would comply with the relevant requirements set forth in My Figueroa, a public improvement project designed to improve the adjacent Figueroa Street corridor. Proposed

signage would include mounted project identification signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors. The Project also includes an LED component located within the Project Site and incidentally visible from Figueroa Street, which may serve as a public art installation with ancillary informational messaging for Project residents.

Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Low-level exterior lights would also be incorporated on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be shielded and directed on site in order to minimize light trespass from the Project Site. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations, including the LASED Streetscape Plan, and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

## **5. Access, Circulation and Public Transportation**

There are currently two existing curb cuts on the Project Site along Figueroa Street, as well as an ingress/egress point on Cottage Place. The Project proposes four curb cuts: one along Figueroa Street; two along James M. Wood Boulevard; and one along Cottage Place. The Project would reduce the number of curb cuts along Figueroa Street, which contributes to the City's efforts to make Figueroa a multi-modal, pedestrian-friendly street.

Vehicular access to the hotel entrance and the residential units would be provided from proposed driveways on both James M. Wood Boulevard and Figueroa Street. These two driveways provide access to an L-shaped, two-way loop through the Project Site that provides access to the residential valet/drop-off lane on the south and to the hotel porte-cochere at the center of the Site. This central loop also feeds and empties the hotel and residential parking garages, providing an efficient ingress/egress layout. In addition, the Project accommodates vehicular access from the adjacent alley, Cottage Place, which provides direct access to the upper parking levels.

A service entrance from James M. Wood Boulevard that provides access to the internal service dock located on the second subterranean level would also be provided. The service driveway length provides a stacking depth for vehicles to access the service dock area away from the street both for arriving and departing vehicles. A proposed roll-down door separates the service dock entry from the street.

Pedestrian access to the residential lobby would be provided from Figueroa Street. Access to ground floor commercial uses would be provided along Figueroa Street and James M. Wood Boulevard. The hotel lobby, reception, waiting lounge, and elevator core would be accessed from the central motor court located on the west side of the proposed building.

The Project Site is located in a transit priority area as defined by SB 743 and ZI 2452, and there are multiple public transportation opportunities in the immediate vicinity of the Project Site. In particular, the Metro 7th Street/Metro Center Station is located approximately 0.3 mile north of the Project Site at the northeastern corner of Figueroa Street and 7th Street. This station is served by Metro's Red, Purple, Blue, and Expo rail lines, along with a Silver Line limited-stop bus route. Additionally, the Metro Pico Station, which is served by the Blue and Expo lines, is located approximately 0.4 mile south. Additionally, Metro, the Los Angeles Department of Transportation (LADOT), and other transit agencies, including the Santa Monica Big Blue Bus, Foothill Transit, OC Bus, Santa Clarita Transit, Torrance Transit, and Antelope Valley Transit Authority, operate numerous bus lines with stops located in proximity to the Project Site. In addition, the LA Streetcar is proposed along Figueroa Street, with the goal to operate 18 hours a day with 7-minute headways during peak hours and frequencies of 10 to 15 minutes during off-hours. The LA Streetcar would provide connections to and from the Convention Center, Staples Center, L.A. LIVE, South Park, the Financial District, Historic Broadway, Grand Park, and the Civic Center.

## **6. Parking**

The Project requires and would provide a minimum of 617 vehicular parking spaces (250 spaces for residential, 45 spaces for hotel, 94 spaces for retail, and 228 spaces for meeting and event space) in compliance with the Central City Area and Downtown Business District parking standards set forth in the LAMC. These parking spaces would be provided within three subterranean levels (Levels B3 through B1) and within portions of the eight above-ground levels in the podium (Levels 2 through 9).

In addition, in accordance with the LAMC, a total of 360 bicycle parking spaces (90 short-term and 270 long-term bicycle parking spaces) would be provided. These bicycle parking spaces would be located on Levels 1 and 2.

## **7. FAR, Density and Setbacks**

As discussed above, the Project Site is located in Height District 4D. While Height District No. 4 permits an FAR of 13:1, the maximum permitted floor area of the Project site is restricted by the "D" development limitation, which limits the FAR to 6:1 without a transfer

of floor area (per Ordinance 164,307). With a lot area of 85,317 square feet, an FAR of 6:1 permits a total floor area of approximately 511,902 square feet.<sup>2</sup>

Pursuant to LAMC Section 14.5.6.B. (Ordinance No. 181,574), a Transfer of Floor Area Rights (TFAR) allows the transfer of unused allowable floor area of a lot from a Donor Site to a Receiver Site for projects involving transfers of 50,000 square feet or greater. The Applicant is requesting approval of a TFAR of 473,038 square feet to the Project Site (Receiver Site) from a Donor Site, which, in this case, is the Los Angeles Convention Center at 1201 S. Figueroa Street. Approval of the TFAR would increase the total allowable floor area of the Project to 984,940 square feet, which results in an FAR of 11:54:1, less than the maximum TFAR of 13:1.

Pursuant to LAMC Section 14.5.9, a Public Benefit Payment based on a formula is required and must be provided with a cash payment of at least 50 percent by the Applicant to the Public Benefits Trust Fund unless otherwise approved by City Council. The remaining 50 percent may be provided by the direct provision of Public Benefits by the Applicant. Pursuant to Ordinance No. 181,574 and Section 14.5.10, a TFAR Transfer Payment is required for the amount of square feet of Floor Area Rights to be transferred from the Donor Site to the Receiver Site.

Per the Greater Downtown Housing Incentive Area Ordinance, LAMC Section 12.22-C.3(C), the maximum number of dwelling units or guest rooms permitted is not limited by the lot area provisions of Chapter 1 of the LAMC, so long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by the dwelling units. The Project is consistent with this requirement.

Also per the Greater Downtown Housing Incentive Area Ordinance, LAMC Section 12.22-C.3(C), no yard requirements apply to the Project Site, except as required by the Downtown Design Guide. The Project Site is within the South Park District of the Guide area, which requires a 0- to 5-foot street wall setback from the back of required sidewalk. The Project is also subject to the LASED Streetscape Plan area that requires an 8-foot private setback from the sidewalk along Figueroa Street. The Project is designed to comply these applicable requirements for setbacks.

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<sup>2</sup> *The existing gross lot area of the Project Site prior to street dedications is 83,716 square feet. As part of the requested Vesting Tentative Tract Map, the Project seeks to vacate and merge 1,601 square feet of surplus City right-of-way along a portion of Figueroa Street which results in a gross lot area of 85,317 square feet. The Project requires a 5-foot dedication on James M. Wood Boulevard and requests a reduced 2-foot dedication along Cottage Place as part of the Vesting Tentative Tract Map, which results in a net lot area of 84,366 square feet. The gross lot area of 85,317, prior to street dedications, is used to calculate floor area in the Greater Downtown Housing Incentive Area*

## **8. Sustainability Features**

The Project would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would be designed to meet the requirements for the U.S. Green Building Council's (USGBC) Leadership in Energy Efficiency and Design (LEED) Silver or equivalent.

### **(a) CEQA Guidelines Appendix F**

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

## **C. Project Construction and Scheduling**

Construction of the Project would commence with demolition of the existing surface parking areas. This phase would be followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2020 and be completed in 2023. The estimated depths of excavation expected for the subterranean parking and building foundations would be up to approximately 50 feet below grade. It is estimated that approximately 145,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase. As part of the Project, a Construction Traffic Management Plan would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan will be discussed in detail in the Transportation/Traffic section of Draft EIR and would be subject to LADOT review and approval.

## D. Necessary Approvals

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

- Pursuant to Los Angeles Municipal Code Section 14.5.6, Transfer of Floor Area Rights (TFAR) for 473,038 square feet of floor area from the Los Angeles Convention Center (Donor Site) to the Project Site (Receiver Site).
- Pursuant to Los Angeles Municipal Code Section 12.32-R, a Building Line Removal to remove a 10-foot building line located along a portion of Figueroa Street.
- Pursuant to Los Angeles Municipal Section 12.24-W.1, a Master Conditional Use Permit (MCUB) for the on-site sale and consumption of a full line of alcoholic beverages at a maximum of ten food and beverage premises and also within the hotel and ancillary areas.
- Pursuant to Los Angeles Municipal Section 16.05, Site Plan Review for the construction of 200 residential units, 220 hotel guest rooms, and 94,080 square feet of non-residential uses.
- Pursuant to Los Angeles Municipal Section 17.15, a Vesting Tentative Tract Map for the merger and resubdivision of the Project Site, for residential and commercial condominium purposes, for the vacation and merger of excess public right-of-way along a portion of Figueroa Street into the Project Site, and for a reduced dedication along Cottage Place.
- Certification of an Environmental Impact Report.
- Haul route approval, as may be required; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.



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

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# **Initial Study**

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## **Attachment B: Explanation of Checklist Determinations**

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

### **I. Aesthetics**

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

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

PRC Section 21099 applies to the Project. As shown in the ZI 2452 map and Figure B-II included as Appendix IS-1, the Project is a mixed-use residential development which is entirely within 0.5 mile of a major transit stop (i.e., the 7th Street/Metro Center Station approximately 0.3 mile north of the Project Site). Therefore, the Project is exempt from aesthetic impacts. The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

*Would the project:*

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

**No Impact.** A significant impact may occur if a project would have a substantial adverse effect on a scenic vista. The Project Site is located within an urban area of Downtown Los Angeles. Although the City General Plan and Central City Community Plan do not clearly define what views are considered “scenic vistas,” the City’s Mobility Plan 2035 indicates that one of the scenic features taken into consideration when designating scenic highways includes “city views,”<sup>2</sup> which suggests that the City has assigned value to such views. Therefore, for purposes of this analysis, the Downtown Los Angeles skyline is considered a scenic resource and views of it are considered scenic vistas. This skyline is visible from several observation points throughout the City and beyond its boundaries. The Project Site is currently occupied by a surface parking lot with minimal city views due to tall structures on adjacent parcels and the area’s relatively flat topography. The Hotel Figueroa, a City Historical Cultural Monument, is visible from the Project Site and streets immediately surrounding the hotel. Scenic vistas of other visual resources in the area, including the Hollywood Hills, are not available. As shown in Figures A-4 and A-5, of this Initial Study, public views of the Hotel Figueroa would continue to be provided from the adjacent streets. As is the case under existing conditions, future views with implementation

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<sup>1</sup> City of Los Angeles, Department of City Planning, Zoning Information File 2452, <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>, accessed June 28, 2017

<sup>2</sup> Los Angeles Department of City Planning, Mobility Plan 2035, An Element of the General Plan, adopted September 7, 2016.

of the Project would continue to depict the highly urbanized downtown area. Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic vistas.

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

**No Impact.** A significant impact may occur if a project would substantially damage scenic resources within a state scenic highway. The Project Site is not located within a State-designated, nor City-designated, scenic highway or associated view corridor.<sup>3</sup> Pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic resources within a state scenic highway

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

**No Impact.** A significant impact may occur if a project would substantially degrade the existing visual character or quality of the site and its surroundings. The Project Site is located within the Central City Community Plan Area of the City of Los Angeles, which is highly urbanized and largely built out with mid- and high-rise structures. The area surrounding the Project Site is characterized by buildings that vary in age, architecture, heights, massing, and materials. Furthermore, the area is interspersed with surface parking areas, similar to the Project Site. While contemporary high-rise buildings dominate the visual landscape in the area surrounding the Project Site, there are also many older buildings with classic architectural styles located throughout the area. In particular, the Project Site is adjacent to the Hotel Figueroa, which is eligible for listing on the National Register of Historic Places.<sup>4</sup>

## **Construction**

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

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<sup>3</sup> *Mobility Plan 2035, Map A4, Citywide General Plan Circulation System—Central, Midcity Subarea.*

<sup>4</sup> *The Hotel Figueroa was determined to be eligible for listing in the National Register by consensus in 1979 through the Section 106 process.*

graffiti would be removed, as needed, from all temporary walkways and construction fencing throughout the Project construction period.

There are five on-site trees located within the Project Site and three street trees located along Figueroa Street. None of the trees are of a species that is protected by the LAMC. Thus, the removal of these trees during construction activities would not substantially alter or degrade the existing visual character of the Project area.

Overall, Project construction activities would not substantially alter or degrade the existing visual character or quality of the Project Site and surrounding area, for the following reasons: (1) views of construction activity would be limited in duration and location; (2) the Project Site appearance would be typical of construction sites in urban areas; (3) construction would occur within an a highly urbanized setting; and (4) construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level. Pursuant to SB 743 and ZI 2452, Project construction would result in no impact to the visual character or quality of the site or its surroundings. However, as discussed above, the limitation of aesthetic impacts pursuant to Section 21099 of the PRC does not include impacts to historic or cultural resources. As discussed in Response to Checklist Questions V.a. and V.b., below, potential impacts to historical and cultural resources will be addressed in the Draft EIR.

## **Operation**

The Project Site is currently occupied by surface parking with limited ornamental landscaping. There are no visual resources on the Project Site. As shown in Figure A-3 in Attachment A, Project Description, of this Initial Study, the 57-story tower would rise over a nine-story podium. The tower portion of the proposed building would be located along Figueroa Street. The Project would be designed in a contemporary architectural style with a combination of glass, stone, and metal building materials.

As discussed above, the aesthetic environment of the Project vicinity consists of a highly urbanized area with a variety of building types and architectural styles, including the historic Hotel Figueroa, with a large number of high-rise structures. The Project would contribute to this urban fabric and would not alter the highly urbanized visual character of its surroundings. Furthermore, the Project area continues to transform, with new and ongoing development incorporating mixed uses with mid- and high-rise buildings of contemporary design. Additionally, the parking to be provided on-site would be located within three subterranean levels and within portions of the podium. Above-grade parking levels have been designed to not be visible from Figueroa Street and James M. Wood Boulevard.

Pursuant to SB 743 and ZI 2452, Project operation would result in no impact to visual character or quality of the site or its surroundings. However, as discussed above, the limitation of aesthetic impacts pursuant to Section 21099 of the PRC does not include impacts to historic or cultural resources. As discussed in Response to Checklist Questions V.a. and V.b., below, potential impacts to historical and cultural resources will be addressed in the Draft EIR.

## **Shading**

As provided in the L.A. CEQA Thresholds Guide, the visual character or quality of a site and its surroundings can also be affected by shading cast upon adjacent areas by proposed structures. Shadow effects depend on several factors, including the local topography, height and bulk of a project's structural elements, sensitivity of adjacent land uses, existing conditions on adjacent land uses, season, and duration of shadow projection. According to the L.A. CEQA Thresholds Guide, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. According to the L.A. CEQA Thresholds Guide, a proposed project would have a significant shading impact if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

As previously discussed, surrounding uses in the general vicinity of the Project Site include commercial and high-density residential uses. Uses on the block in which the Project Site is located include a two-story building used for emergency housing (Zahn Emergency Housing) to the west on James M. Wood Boulevard, a surface parking lot to the north at the southwest corner of James M. Wood Boulevard and Figueroa Street that provides parking for the Pantry Café located across the street, and the Hotel Figueroa to the south. Immediately south of the Project Site is the Los Angeles Sports and Entertainment District and L.A. LIVE, an entertainment, hotel, and residential complex. L.A. LIVE includes the Microsoft Theater, JW Marriott hotel, Ritz-Carlton hotel and Residences, Regal Cinemas, the GRAMMY Museum, Microsoft Square, and various restaurants and offices. Immediately west of the Project Site are buildings occupied by the Salvation Army, the Marriott Residence Inn, and Courtyard by Marriott. The blocks north of the Project Site include the Original Pantry Café and the 6.3-acre Metropolis development which consists of four towers up to 40 stories in height, 70,000 square feet of retail, 1,500 residential condominiums, and a 350-room hotel. East of the Project Site is the 30-story Apex Building and the 26-story Olympic Apartments, both of which consist of ground floor commercial uses with residential units above. Of these nearby uses, the routinely usable outdoor uses associated with hotel and residential uses would be

considered most sensitive to shading. As shown in the shadow diagrams provided in Appendix IS-2, these and other shadow-sensitive areas within the vicinity of the Project Site would not be shaded for three hours or more between the hours of 9:00 A.M. and 3:00 P.M. during the winter or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. during the remaining seasons. Pursuant to SB 743 and ZI 2452, the Project would result in no impact with respect to shading.

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

**No Impact.** A significant impact may occur if a project would create a new source of light or glare which would adversely affect daytime or nighttime views in the area. The Project Site currently generates moderate levels of artificial light and glare typical of a commercial development. Light sources within the Project Site include low-level security lighting, vehicle headlights, and surface parking lot lighting. Glare sources within the Project Site include glass and metal vehicle and building surfaces. The surrounding ambient nighttime lighting environment is typical of a developed, urban environment. The primary nighttime lighting sources in the Project Site vicinity include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting.

The Project would introduce new sources of light and glare that are typically associated with residential and commercial uses, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Surrounding uses with views of the Project Site that are considered sensitive relative to nighttime light include residential uses. In the immediate Project vicinity, the nearest off-site receptors that are considered sensitive relative to daytime glare and have views of the Project Site are nearby residential uses and motorists on surrounding streets.

**Construction**

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

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

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. As such, construction activities would not result in a new source of substantial light which would adversely affect daytime views in the area. Moreover, in accordance with SB 743 and ZI 2452, aesthetic impacts are not significant.

## **Operation**

The Project would increase the number of vehicle trips to and from the Project Site. However, the Project would eliminate sources of glare associated with the existing surface parking lot. New sources of artificial lighting that would be introduced by the Project would include: low-level interior lighting visible through the windows of the buildings; signage lighting; architectural lighting on the building, including lighting associated with rooftop uses and activities; low-level security and wayfinding lighting; landscape lighting; and automobile headlights. New sources of glare would include building surfaces and Project-related vehicles. All exterior lights, including lights on the terraces and rooftop, would be directed toward the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. Project lighting would also meet all applicable LAMC lighting standards. As required by LAMC Sec. 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. In accordance with the LAMC (Chapter 1, Article 4.4, Section 14.4.4 E), illumination used for Project signage would be limited to a light intensity of 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

With regard to glare, the Project would be designed in a contemporary architectural style and would feature concrete, stucco, aluminum, and glass. Specifically, stone cladding would be used extensively on the podium in contrast to the glass tower above. In order to meet the requirements of Title 24, a high performance coating is needed for the exterior glazing so as to obtain as much transparency as possible and to avoid the dark, heavily tinted windows of previous generations. The glass coating would be carefully selected in order to achieve as much transparency as possible within the limits of Title 24 with as low reflectivity as possible. Additionally the design features frits, decorative screens and



sunshades in strategic areas that will reduce the overall reflectivity of the project. Therefore, these materials would not have the potential to produce a substantial degree of glare. Furthermore, the use of stone on the podium would reduce the potential for glare to affect motorists on adjacent streets. In addition, the proposed parking areas would be either located underground or screened from view, which would eliminate the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night. While headlights from vehicles entering and exiting the Project's driveways would be visible from the residential receptors immediately north and south of the Project Site during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact.

Lighting and glare associated with Project operation would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Pursuant to SB 743 and ZI 2452, Project operation would result in no impact with respect to light or glare.

## II. Agriculture and Forest Resources

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

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

**No Impact.** The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed as a surface parking lot. In addition, the uses surrounding the Project Site include commercial and residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland

of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.<sup>5</sup> As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is zoned by the LAMC as C2-4D which permits various commercial and residential uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.<sup>6</sup> Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and is currently developed as surface parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial and residential uses. The Project Site is not zoned for forest land and is not used as forest land.<sup>7</sup> Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur,

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<sup>5</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed February 14, 2017.

<sup>6</sup> California Department of Conservation, *Los Angeles County Williamson Act FY 2015/2016*, 2016.

<sup>7</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed February 14, 2017.

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

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

**No Impact.** The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.<sup>8</sup> As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### 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 Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM<sub>2.5</sub>], and lead<sup>9</sup>). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>10</sup> With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/

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<sup>8</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed February 14, 2017.

<sup>9</sup> *Partial Nonattainment designation for the Los Angeles County portion of the Basin only.*

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

Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area.

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

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

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

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

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

**Potentially Significant Impact.** As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM<sub>2.5</sub> and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM<sub>10</sub>), and PM<sub>2.5</sub>. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

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

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

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

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

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses, as the Project would include residential uses. In addition, the proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.<sup>11</sup>

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

## **IV. Biological Resources**

*Would the project:*

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or**

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<sup>11</sup> SCAQMD, *Visible Emissions, Public Nuisance, and Fugitive Dust*, [www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust](http://www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust), accessed May 10, 2017.

**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?**

**Less Than Significant Impact.** The Project Site is located in an urbanized area and is currently developed as surface parking. Landscaping is limited, consisting of ornamental trees and shrubs within portions of the Project Site and along Figueroa Street. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife<sup>12</sup> or by the U.S. Fish and Wildlife Service<sup>13</sup> would be present on-site. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. Therefore, further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed as surface parking. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.<sup>14,15</sup> In addition, there are no other sensitive natural communities identified by the California Department of Fish and Game or the US Fish and Wildlife Service.<sup>16,17,18</sup> Therefore, the Project would not have a substantial

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<sup>12</sup> California Department of Fish and Wildlife, *California Natural Diversity Database, Special Animals List*, April 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline>, accessed June 26, 2017.

<sup>13</sup> United States Fish and Wildlife Service, *ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California*, <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=list>, accessed June 26, 2017.

<sup>14</sup> City of Los Angeles Department of City Planning, *ZIMAS, Parcel Profile Report*, <http://zimas.lacity.org/>, accessed February 14, 2017.

<sup>15</sup> United States Environmental Protection Agency, *NEPAssist*, [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist), accessed May 10, 2017.

<sup>16</sup> California Department of Fish and Wildlife, *Biogeographic Information and Observation System (BIOS)*, [www.wildlife.ca.gov/Data/BIOS](http://www.wildlife.ca.gov/Data/BIOS), accessed June 26, 2017.

<sup>17</sup> California Department of Fish and Wildlife, *CDFW Lands*, <https://www.wildlife.ca.gov/Lands>, accessed June 26, 2017.

adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed as surface parking. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site.<sup>19</sup> As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** As described above, the Project Site is located in an urbanized area and is currently developed as surface parking. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Specifically, the Project Site is not located within the Los Angeles River Watershed or significant ecological areas [SEAs] (i.e., Santa Monica Mountains, Verdugo Mountains, or Griffith Park), or near other sites with surface water (e.g., Hansen Dam and Sepulveda Basin), or between areas of wildlife movement.<sup>20,21,22,23</sup> Accordingly, development of the Project would not interfere

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<sup>18</sup> United States Fish and Wildlife Service, *National Wetlands Inventory*, [www.fws.gov/wetlands/index.html](http://www.fws.gov/wetlands/index.html), accessed June 26, 2017.

<sup>19</sup> United States Environmental Protection Agency, *NEPAssist*, [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist), accessed June 26, 2017.

<sup>20</sup> City of Los Angeles, *Los Angeles River Revitalization, Ecosystem*, <http://lariver.org/ecosystem>, accessed June 26, 2017.

<sup>21</sup> County of Los Angeles, *General Plan 2035, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map*, [http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-3\\_significant\\_ecological\\_areas.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf), accessed June 26, 2017.

<sup>22</sup> County of Los Angeles, *General Plan 2035, Figure 9.2, Regional Habitat Linkages*, [http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-2\\_Regional\\_Wildlife\\_Linkages.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-2_Regional_Wildlife_Linkages.pdf), accessed June 26, 2017.

substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site. Although unlikely, the five existing ornamental on-site trees (four hybrid strawberry trees and one Mexican fan palm) and three street trees (three Laurel figs) that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. In accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–September 15), if and to the extent feasible. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. With compliance with the Migratory Bird Treaty Act, the impact would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as “protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

Landscaping within the Project Site is limited, consisting of ornamental trees and shrubs within portions of the Project Site. There are five on-site trees located within the Project Site (four hybrid strawberry trees and one Mexican fan palm) and three street trees (three Laurel figs) located along Figueroa Street. None of the trees are of a species that is protected by the LAMC. The on-site trees would be replaced on a 1:1 basis, while the street trees would be replaced on a minimum 2:1 basis or as determined by the Department of Public Works. The new tree species would be drought-tolerant and/or of a

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<sup>23</sup> *United States Environmental Protection Agency, NEPAassist, [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist), accessed June 26, 2017*



climate-adapted nature and would primarily require moist to dry soil conditions. Thus, the planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed as surface parking. As previously described, landscaping within the Project Site is limited, consisting of ornamental trees and shrubs within portions of the Project Site. The Project Site does not support any habitat or natural community.<sup>24,25</sup> Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>26</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## **V. Cultural Resources**

*Would the project:*

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

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

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<sup>24</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 14, 2017.

<sup>25</sup> United States Environmental Protection Agency, NEPAassist, [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist), accessed May 10, 2017.

<sup>26</sup> California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed June 26, 2017.

determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

As discussed in Attachment A, Project Description, of this Initial Study, the Hotel Figueroa is located directly to the south of the Project Site and is a City Historical Cultural Monument. The Hotel Figueroa is also eligible for listing on the National Register of Historic Places.<sup>27</sup> Therefore, the EIR will provide further analysis of the Project's potential to result in indirect impacts to historic resources.

**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 Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project would require grading, excavation up to 50 feet below grade, and other construction activities that could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

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

**Potentially Significant Impact.** The Project Site is currently developed as a surface parking lot and there are no unique geologic features on the Project Site. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic

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<sup>27</sup> *The Hotel Figueroa was determined to be eligible for listing in the National Register by consensus in 1979 through the Section 106 process.*

strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading and excavation to greater depths than those having previously occurred (i.e., up to 50 feet below grade) which would have the potential to disturb undiscovered paleontological resources that may exist within the Project Site. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

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

**Potentially Significant Impact.** As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those having previously occurred (i.e., up to 50 feet below grade) on the Project Site, the potential exists for the Project to uncover human remains. Therefore, the EIR will provide further analysis of this topic.

## **VI. Geology and Soils**

The following analysis uses the Preliminary Geotechnical Evaluation Report (Geotechnical Report) prepared for the Project by Leighton and Associates, Inc., dated February 23, 2017. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-3 of this Initial Study.

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

*Would the project:*

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

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

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

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

The closest active fault is the Puente Hills Blind Thrust Fault, located approximately 0.25 mile from the Project Site.<sup>28,29</sup> The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, or within a City-designated Fault Rupture Study Area.<sup>30,31</sup>

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<sup>28</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 14, 2017.

<sup>29</sup> The Geotechnical Evaluation Report prepared for the Project identifies the Puente Hills Blind Thrust Fault as being 3.1 miles from the Project Site and Caltrans database places it 2.6 miles from the Project Site. The City's ZIMAS report indicates the fault is located 0.25 mile from the Project Site. The fault is a buried fault with no surface trace, so variances in interpretation of the distance may occur. The distance provided in ZIMAS is the most conservative estimate.

<sup>30</sup> State of California, California Geological Survey, Earthquake Zones of Required Investigation Hollywood Quadrangle, updated November 6, 2014.

Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Moreover, the Project would not exacerbate existing fault rupture conditions. Thus, the Project would not exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** As described above, the Project Site is located within the seismically active region of Southern California and would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. The potentially significant impacts related to seismic ground shaking at the Project Site would not be exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would exacerbate ground shaking. Furthermore, as discussed above, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required.

The following discussion about building and seismic codes is provided for informational purposes. Engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. As discussed in detail below, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The Geotechnical Report contains preliminary recommendations for the type of engineering practices that would be used. Additionally, a final design-level geotechnical report will be prepared by the Project Applicant and reviewed to the satisfaction of the Department of Building and Safety before the issuance of grading permits. The final recommendations from that report will be enforced for the construction of the Project. Based on the Geotechnical Report, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project would comply with the Los Angeles Building Code (LABC),

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<sup>31</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 14, 2017.

which incorporates current seismic design provisions of the 2016 California Building Code with City amendments. The 2016 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the LABC. The Project would also be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report. In addition, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. Impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

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

Neither the City of Los Angeles or the State of California classifies the Project Site as part of a potentially liquefiable area.<sup>32,33</sup> In addition, due to the presence of dense to very dense granular soils below the anticipated foundation level of the proposed building and the relatively deep groundwater table (i.e., 61 feet bgs), the potential for liquefaction is considered negligible. Due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and the liquefaction mapping by the City and State, the Project Site would not be susceptible to liquefaction during an earthquake event. Therefore, based on these considerations, the Project would not exacerbate existing

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<sup>32</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 14, 2017.

<sup>33</sup> State of California, California Geological Survey, Earthquake Zones of Required Investigation Hollywood Quadrangle, updated November 6, 2014.

environmental conditions and cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the State,<sup>34</sup> nor is the Project Site mapped as a landslide area by the City of Los Angeles.<sup>35,36</sup> Development of the Project would not substantially alter the existing topography of the Site. Specifically, the Project Site would remain flat and would not cause landslides. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, impacts

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<sup>34</sup> *State of California, Seismic Hazard Zones, Hollywood Quadrangle, released March 25, 1999.*

<sup>35</sup> *Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.*

<sup>36</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 14, 2017.*

regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

**Less Than Significant Impact.** As discussed above, Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. Additionally, as discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the depth to groundwater, subsidence and liquefaction are unlikely at the Project Site. The Project would not exacerbate existing conditions since it would not cause a geologic unit or soil to become unstable. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site is underlain by 5 to 10 feet of artificial fill, with Quaternary-age alluvial deposits below.<sup>37</sup> The artificial fill is expected to consist of sandy soils with varying amounts of silt, clay, and gravel. Construction debris, associated with buildings that were demolished between 2006 and 2007, may also be present in this layer of fill.<sup>38</sup> The deeper Quaternary-age alluvial deposits consist of dense to very dense sand, with occasional layers of clay and silt encountered at lower depths. The on-site soils are anticipated to exhibit very low expansion potential. If encountered, expansive soils would be removed during excavation. In addition, the Project would not increase the expansion potential of these soils. Furthermore, with the incorporation of site-specific geotechnical recommendations, impacts related to expansive soils would not be exacerbated by the Project and, thus, would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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<sup>37</sup> Appendix IS-3, p. 2.

<sup>38</sup> Appendix IS-3, p. 3.



- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

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

## **VII. Greenhouse Gas Emissions**

*Would the project:*

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

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

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

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

## **VIII. Hazards and Hazardous Materials**

The following analysis is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA) prepared for the Project by Leighton and Associates, Inc.,

dated March 2, 2017. All specific information on historic and existing on-site conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-4 of this Initial Study.

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

*Would the project:*

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

**Less Than Significant Impact.** The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. However, all potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

**Less Than Significant Impact.** The Phase I ESA included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. As discussed therein, the Project Site currently consists of surface parking. The Project Site was developed with residential dwellings and sheds as early as 1888. Various commercial structures were developed on-site beginning in 1921. These uses included auto repair, service stations, cafes, offices, and storage. The last of the structures were demolished in 2006 and the Project Site has consisted solely of surface parking since that time.

With respect to historic uses, one potential auto repair and service station and one potential dry cleaner were identified on-site. An additional 13 potential historic cleaning facilities were identified within a 0.25-mile radius. The laundry facilities were reported to primarily operate between the years 1924 and 1933, as well as several laundries, which were primarily washing facilities, and a hand laundry that operated through 1942.<sup>39</sup> Tetrachloroethylene (PCE) was introduced in 1934 and was the leading dry cleaning solvent by 1948. Based on the limited operation of the reported cleaners during a time when PCE was commonly used, these facilities are expected to have a low potential to adversely affect the Project Site.<sup>40</sup> Furthermore, no releases from off-site historic cleaning facilities were reported. In the event undocumented releases are encountered, the planned subsurface and aboveground parking of the proposed building would provide air exchange that would reduce the potential for vapor intrusion into occupied areas.<sup>41</sup>

The Phase I included a site reconnaissance visit. No evidence of hazardous substances, aboveground storage tanks (ASTs) or underground storage tanks (USTs), polychlorinated biphenyls (PCBs), dumping, stressed vegetation, unusual odors, or pits, ponds, or lagoons were identified on-site.<sup>42</sup> Moderate staining was observed on paved surfaces throughout the Project Site that appeared to be due to leaking from parked cars. The asphalt was observed to be in moderate to poor condition with some cracking observed. This condition was not identified as a hazard.

As there are no structures currently on-site, asbestos-containing materials (ACM) and lead-based paint (LBP) surveys were not conducted. However, there is a possibility

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<sup>39</sup> Appendix IS-4, p. 13.

<sup>40</sup> Appendix IS-4, p. 13.

<sup>41</sup> Appendix IS-4, p. 14.

<sup>42</sup> Appendix IS-4, p. 30.

that undocumented underground structures may be encountered during construction.<sup>43</sup> In the event any suspect ACM or LBP is found, the Project would adhere to all federal, state, and local regulations prior to their removal. These regulations include, but are not limited to, the Toxic Substances Control Act (TSCA), the Resource Conservation and Recovery Act (RCRA), the federal and state Occupational Safety and Health Acts, SCAQMD Rule 1403 pertaining to asbestos emissions from renovation/demolition activities, and the Residential Lead-Based Paint Reduction Act. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACM and LBP to less than significant levels.

The current uses on the Project Site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal, or generation of significant quantities of hazardous substances or petroleum products. As described above and in the Phase I ESA, no evidence or record of underground storage tanks or aboveground storage tanks was found.<sup>44</sup> In the event an undocumented UST is identified on-site, it would be appropriately documented and removed according to Los Angeles Fire Department (LAFD) regulations.

The Project Site is also located within a Methane Buffer Zone identified by the City.<sup>45</sup> Prior to construction, a methane survey will be conducted adhering to Department of Building and Safety regulations. In the event methane levels exceed acceptable levels, the Project will incorporate appropriate design measures will be identified in accordance with the methane seepage regulations contained in the LAMC (Chapter 9, Article 1, Division 71, Section 91.7104) and included in the Project's design.<sup>46</sup> Therefore, there would be a negligible risk of subsurface methane release with compliance with these regulations. No other recognized environmental concerns (RECs) or historic recognized environmental concerns (HRECs) were identified on the Project Site.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>43</sup> Appendix IS-4, p. 36.

<sup>44</sup> Appendix IS-4, p. 29.

<sup>45</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 14, 2017.

<sup>46</sup> Methane seepage regulations adopted by Ordinance No. 175790, February 12, 2004.

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

**Less Than Significant Impact.** There are no public schools located within 0.25 mile of the Project Site. The nearest school is Gratts Elementary School located approximately 0.8 mile north of the Project Site at 309 Lucas Avenue. Notwithstanding, as discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements discussed above in Response to Checklist Question VIII.a. As such, even if the Project were to be located within 0.25 mile of a school, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

**d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would 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.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The Project Site was identified in three databases. These listings include the two historic uses discussed above (i.e., an auto repair/service station and potential dry cleaner), as well as a waste manifest for 33.71 tons of ACM associated with building demolition in 2006. The database search also included searches for pipelines, USTs and hazardous materials regulated by the State Water Quality Control Board (SWQCB), DTSC, and SCAQMD. No pipelines, USTs, or hazardous materials regulated by the SWQCB were identified. SCAQMD identified two listings on adjacent properties, including an emissions violation from a broiler in the Hotel Figueroa and the Salvation Army building, though no permits, equipment, or violations were reported in the Salvation Army building.<sup>47</sup> Various historic discharge permits issued by the City of Los Angeles Bureau of Sanitation associated with the now demolished buildings were also identified. None of these listings are considered to be environmental concerns for the Project Site.<sup>48</sup> The Project would not exacerbate existing conditions associated with these listed items because the historic uses are gone and because the most recent buildings prior to the extant surface parking lots were demolished. In addition, the other listings are associated with adjacent properties (i.e., SCAQMD's two listings above).

Additionally, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is not located within an area subject to an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is Los

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<sup>47</sup> Appendix IS-4, p. 16.

<sup>48</sup> Appendix IS-4, p. 35.

Angeles International Airport (LAX), located approximately 11 miles southwest of the Project Site. Given the distance between the Project Site and LAX, the Project would not have the potential to result in a safety hazard. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required. With regard to potential impacts to air traffic, see Checklist Question XVI.c, Transportation/Circulation, below.

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 21.5 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not have the potential to result in a safety hazard. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** According to the Safety Element of the City of Los Angeles General Plan, Figueroa Street, adjacent to the Project Site, is a designated disaster route.<sup>49</sup> While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. Specifically, the hotel entrance and residential uses would be accessed via proposed driveways on James M. Wood Boulevard and Figueroa Street. Vehicular access from the adjacent alley, Cottage Place, would also be provided. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's

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

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

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

**Less Than Significant Impact.** There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,<sup>50</sup> nor is it located within a City-designated fire buffer zone.<sup>51</sup> Therefore, the Project would exacerbate conditions that would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed residential and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

The following analysis is based, in part, on the Water Resources Technical Report (Water Resources Report) prepared for the Project by KPFF Consulting Engineers, dated May 26, 2017. All specific information on hydrology and water quality conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-5 of this Initial Study.

*Would the project:*

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

**Less Than Significant Impact.** During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce

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<sup>50</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 14, 2017. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

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



airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the requirements of the permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented during construction of the Project. The SWPPP would set forth Best Management Practices (BMPs), including erosion control, sediment control, non-stormwater management, and materials management measures, to minimize the discharge of pollutants in stormwater runoff. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities.

In addition, project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Project Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the Construction General Permit. With compliance with these existing regulatory requirements, including those pertaining to temporary dewatering, impacts to water quality during construction would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential, community, office, and retail uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, the Project would implement BMPs for managing stormwater runoff in accordance with the current City of Los Angeles Low Impact Development (LID) Ordinance requirements. The City's LID Ordinance sets the order of priority for selected BMPs. This order of priority is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretenion systems, and any combination of any of these measures. Based on the proposed excavation depth and groundwater levels, it is assumed that soils beneath the Project Site are not suitable for infiltration.<sup>52</sup> Therefore, capture and reuse or biofiltration will be implemented as part of the Project to meet City

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<sup>52</sup> *Appendix IS-5, p. 27.*

requirements. With compliance with these existing regulatory requirements, impacts on water quality during operation would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** Based on the depth to groundwater, approximately 61 feet below ground surface (bgs), and excavation depths up to 50 feet bgs, dewatering is not anticipated for the Project.<sup>53</sup> Therefore, the Project would not result in impacts to groundwater supplies from dewatering.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. As discussed in the Water Resources Report, approximately 100 percent of the Project Site currently consists of impervious surface area. Therefore, surface water infiltration and groundwater recharge is negligible. With implementation of the Project, impervious surfaces would comprise approximately 95 of the Project Site. As such, operation of the Project has the potential to slightly increase the amount of groundwater recharge that occurs within the Project Site. However, the groundwater recharge would not be interfered substantially by the Project such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** As discussed in the Water Resources Report, approximately 100 percent of the Project Site is covered with impervious surfaces. The Project Site is not crossed by any water courses or rivers. Currently, stormwater from the Project Site is conveyed by sheet flow toward the southwest. A portion of this flow is directed toward on-site catch basins and further discharged to curb drains along James M. Wood Boulevard and Figueroa Street. The remaining stormwater flows toward the public

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<sup>53</sup> Appendix IS-5, p.26.

right-of-way. Stormwater runoff eventually drains into the City storm drain system on Olympic Boulevard.

Construction activities associated with the Project, which would involve grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above in Response to Checklist Question IX.a, in accordance with NPDES requirements the Project would implement a SWPPP that would specify BMPs and erosion/siltation control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

At buildout of the Project, the Project Site would be comprised of approximately 95 percent impervious areas. Accordingly, there is no incremental increase in the imperviousness of the Project Site that would substantially increase runoff volumes into the existing storm drain system. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project and, as such, the Project would not result in substantial erosion or siltation on- or off-site.<sup>54</sup>

As part of LID compliance for the Project to manage post-construction stormwater runoff, the Project would include the installation of area drains, planter drains, and building roof drain downspouts throughout the Project Site and within the building to collect building, roof, and site runoff and direct stormwater through a series of storm drain pipes. This on-site stormwater conveyance system would serve to prevent onsite flooding and nuisance water on the Project Site. In addition, with implementation of the proposed BMPs, the volume of water leaving the Project Site would be further reduced compared to existing conditions.

In addition, through compliance with all applicable NPDES requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading regulations, the Project would not substantially alter the existing

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<sup>54</sup> *Per the City's Special Order No. 007-1299, the City has adopted the Los Angeles County Department of Public Works (LACDPW) Hydrology Manual as its basis of design for storm drainage facilities. The Hydrology Manual requires projects to have drainage facilities to meet the Urban Flood level of protection, which is defined as runoff from a 25-year frequency storm falling on a saturated watershed. The City of Los Angeles CEQA Thresholds Guide, however, establishes the 50-year frequency design storm event as the threshold to evaluate potential impacts on surface water hydrology. Therefore, to provide a more conservative analysis of the ability of storm drain infrastructure to accommodate the demand generated by the Project, the higher 50-year storm event threshold was used.*

drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Therefore, the impact would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** No streams or rivers cross the Project Site, nor are there any located near to or adjacent to the site. As discussed in Response to Checklist Question IX.c, above, the Project would reduce the amount of impervious surface area on the Project Site and reduce the volume of water leaving the Project Site. Therefore the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** As discussed above in Response to Checklist Question IX.a the Project would implement capture and reuse or biofiltration to reduce stormwater pollution on the Project Site in accordance with the City's LID requirements. Furthermore, as discussed above in Response to Checklist Question IX.c, the Project would reduce the rate and volume of stormwater runoff leaving the Project Site. Therefore, the Project would not 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. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

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

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

**No Impact.** The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.<sup>55,56</sup> Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required. No further analysis of this topic in an EIR is required.

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

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

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

**Less Than Significant Impact.** As discussed above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin or within a dam inundation area.<sup>57</sup> The nearest dam is Mulholland Dam located approximately 3 miles north of the Project Site. Likewise, the Project Site is not located near a levee. The nearest levee is along the Los Angeles River located approximately 2 miles east of the Project Site.<sup>58</sup> Accordingly, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam or levee failure would not occur. Therefore, no impacts related to flooding as a result of a levee or dam failure would occur, and no further analysis of this topic in the EIR is required.

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<sup>55</sup> Federal Emergency Management Agency, *Flood Insurance Rate Map, Panel Number 06037C1620F*, effective September 26, 2008.

<sup>56</sup> City of Los Angeles, *Safety Element of the Los Angeles City General Plan*, November 26, 1996, Exhibit F, p. 57.

<sup>57</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit G, *Inundation & Tsunami Hazard Areas*, p. 59.

<sup>58</sup> United States Army Corps of Engineers, *Los Angeles River 2 Levee System*, October 2014.

#### j. Inundation by seiche, tsunami, or mudflow?

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

The Project Site is located approximately 14 miles east of the Pacific Ocean and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.<sup>59</sup> The nearest body of water to the Project Site is the MacArthur Park Lake, approximately 1.1 miles northwest of the Project Site, so inundation as a result of seiche is unlikely. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Given the fact that the Project Site is not mapped by either the State or the City as being located in an area prone to landslides, the potential for the Project Site to be inundated by mudflows is low.<sup>60</sup> Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

## X. Land Use and Planning

*Would the project:*

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

**Less Than Significant Impact.** As shown in the aerial photograph provided in Figure A-2 of Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area with low- to high-rise buildings that are occupied primarily by commercial and high-density residential uses. The Project would replace the existing surface parking lot with a new infill mixed-use project. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose a freeway or other large infrastructure that would divide a community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

<sup>60</sup> *See Section VI, Geology and Soils, on page B-19.*

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

**Potentially Significant Impact.** As discussed in this Initial Study, the Project could have potentially significant environmental effects that could conflict with land use plans, policies or regulations (e.g., the General Plan and the Community Plan) that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the EIR will provide further analysis of the whether the Project conflicts with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed with a parking lot. As previously described, landscaping is limited, consisting of ornamental landscaping within portions of the Project Site. As discussed above in Section IV, Biological Resources, the Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>61</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## **XI. Mineral Resources**

*Would the project:*

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

**No Impact.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.<sup>62,63,64</sup> The Project Site is

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<sup>61</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 14, 2017.

<sup>62</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.

also not located within a City-designated oil field or oil drilling area.<sup>65</sup> Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.<sup>66,67,68</sup> The Project Site is also not located within a City-designated oil field or oil drilling area.<sup>69</sup> Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## **XII. Noise**

*Would the project result in:*

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

**Potentially Significant Impact.** The Project Site is located within an urbanized area that contains various sources of noise. The most predominate source of noise in the

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<sup>63</sup> State of California Department of Conservation, California Geologic Survey, *Aggregate Sustainability in California*, 2012.

<sup>64</sup> City of Los Angeles, *Conservation Element of the Los Angeles City General Plan*, January 2001, Exhibit A, p. 86.

<sup>65</sup> City of Los Angeles, *Safety Element of the Los Angeles City General Plan*, November 26, 1996, Exhibit E, p. 55.

<sup>66</sup> City of Los Angeles, Department of City Planning, *Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report*, January 19, 1995. Figure GS-1.

<sup>67</sup> State of California Department of Conservation, California Geologic Survey, *Aggregate Sustainability in California*, 2012.

<sup>68</sup> City of Los Angeles, *Conservation Element of the Los Angeles City General Plan*, January 2001, Exhibit A, p. 86.

<sup>69</sup> City of Los Angeles, *Safety Element of the Los Angeles City General Plan*, November 26, 1996, Exhibit E, p. 55.



vicinity of the Project Site is associated with traffic from roadways. Existing on-site noise sources primarily include vehicle noises associated with on-site circulation and parking areas, as well as human activity on the Project Site. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new permanent residential and commercial uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

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

**Potentially Significant Impact.** Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

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

**Potentially Significant Impact.** Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

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

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

**No Impact.** The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is LAX, located approximately 11 miles southwest of the Project Site. Given the distance between the Project Site and

LAX, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 21.5 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

*Would the project:*

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

**Less Than Significant Impact.** The Project would result in the construction of 200 residential multi-family dwelling units. As such, the Project would increase the residential population within the Project vicinity. As discussed above in Checklist Question III(a), Air Quality, SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG has prepared the 2016–2040 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2040. The growth projections in the 2016–2040 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG’s planning area. The Project Site is located in SCAG’s City of Los Angeles Subregion. According to SCAG’s 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2017 is approximately 3,981,911 persons.<sup>70</sup> In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,145,604 persons.<sup>71</sup>

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

<sup>71</sup> Based on a linear interpolation of 2012–2040 data.

According to the Census Bureau's 2015 American Community Survey, the estimated household size for the City of Los Angeles is 2.86 persons per unit.<sup>72</sup> Applying this factor, development of 200 dwelling units would result in a net increase of approximately 572 residents. The estimated 572 net new residents generated by the Project would represent approximately 0.35 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2017 and 2023. Furthermore, the Project does not include the through extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's population projection for the City of Los Angeles Subregion.

According to the 2016–2040 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2017 is approximately 1,390,643 households.<sup>73</sup> In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,468,814 households.<sup>74</sup> Thus, the Project's 200 residential units would constitute up to approximately 0.33 percent of the housing growth forecasted between 2017 and 2023. Therefore, the Project's housing units would be well within SCAG's housing projection for the Subregion.

As discussed in Attachment A, Project Description, the Project includes a 220-room hotel and approximately 94,080 square feet of new commercial spaces anticipated to be comprised of approximately 44,080 square feet of retail uses and approximately 50,000 square feet of restaurants. Under this scenario, the Project would generate approximately 656 employees based on employee generation rates developed by the Los Angeles Unified School District (LAUSD).<sup>75</sup> According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2017 is approximately 1,780,811 employees.<sup>76</sup> In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,882,104 employees.<sup>77</sup> Thus, the Project's estimated 656 employees would constitute approximately 0.65 percent of the employment growth forecasted between 2017 and 2023. Therefore, the Project would not

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<sup>72</sup> *United States Census Bureau, 2015 American Community Survey, 2015 Average Household Size of Occupied Housing Units by Tenure, [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_15\\_1YR\\_B25010&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_B25010&prodType=table), accessed March 9, 2017.*

<sup>73</sup> *Based on a linear interpolation of 2012–2040 data. SCAG forecasts “households,” not housing units. As defined by the U. S. Census Bureau, “households” are equivalent to occupied housing units.*

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

<sup>75</sup> *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Based on the employee generation rate for “Neighborhood Shopping Center” land uses, which is 0.00271 employee per square foot and the employee generation rate for “Lodging” land uses, which is 0.00113 per square foot. Restaurant uses are included in the “Neighborhood Shopping Center” category.*

<sup>76</sup> *Based on a linear interpolation of 2012–2040 data.*

<sup>77</sup> *Based on a linear interpolation of 2012–2040 data.*

cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

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

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

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

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

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

## **XIV. Public Services**

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

**a. Fire protection?**

**Potentially Significant Impact.** The LAFD provides fire protection and emergency medical services for the Project Site. The closest LAFD fire station to the Project Site is Fire Station No. 10 located at 1335 South Olive Street in Los Angeles, approximately

0.6 mile south of the Project Site.<sup>78</sup> The Project would increase the building square footage on-site and introduce a residential population, which could result in the need for new or physically altered LAFD facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of this issue will be included in the EIR.

#### **b. Police protection?**

**Potentially Significant Impact.** Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would introduce new residential and commercial uses to the site that would increase the density at the Project Site, and increase the residential and daytime population in the service area. This could result in the need for additional police services and associated facilities, the construction of which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

#### **c. Schools?**

**Potentially Significant Impact.** The Project Site is located within the boundaries of the LAUSD. The LAUSD is divided into six local districts.<sup>79</sup> The Project Site is located in Local District—Central.<sup>80</sup> The Project would include the development of residential uses, which would generate a demand for educational services and school facilities, the construction of which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

#### **d. Parks?**

**Potentially Significant Impact.** The development of residential uses as part of the Project would generate a new population at the Project Site that could utilize nearby parks and/or recreational facilities, possibly necessitating new parks, the construction of which could cause significant environmental impacts. Thus, the EIR will provide further analysis of this issue.

#### **e. Other public facilities?**

**Potentially Significant Impact.** The development of residential uses as part of the Project would generate a new population that would generate a demand for library services

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<sup>78</sup> Los Angeles Fire Department, *Fire Station Locator*, [www.lafd.org/fire-stations/station-results?st=361&address=913%20Figueroa%20Street](http://www.lafd.org/fire-stations/station-results?st=361&address=913%20Figueroa%20Street), accessed February 17, 2017.

<sup>79</sup> Los Angeles Unified School District, *Board of Education Districts Maps 2015–2016*, <http://achieve.lausd.net/Page/8652>, accessed February 7, 2017.

<sup>80</sup> Los Angeles Unified School District, *Board of Education Local District—Central Map*, July 2015.

provided by the Los Angeles Public Library, possibly necessitating the construction of new libraries which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

## **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.** The development of residential uses as part of the Project would generate a new population at the Project Site that could utilize nearby parks and/or recreational facilities, possibly resulting in the physical deterioration of those facilities. Thus, the EIR will provide further analysis of this issue.

- 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 not include the development of public recreational facilities. However, the Project would introduce a new residential population to the Project Site that could utilize nearby recreational facilities, possibly necessitating the construction or expansion of new recreational facilities which might have an adverse physical effect on the environment. Therefore, the EIR will provide further analysis of this topic.

Additionally, the Project would include development of private open space and recreational amenities associated with its residential component. These amenities include a pool, sunning decks, spa, lounge areas, water features, fire pits, gardens, interior lounge, and a residential pool house. The potential impacts associated with construction of these facilities are analyzed throughout this Initial Study, and will be further analyzed in the EIR for those topics where impacts could be potentially significant.

## **XVI. Transportation/Traffic**

*Would the project:*

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

**Potentially Significant Impact.** The Project proposes development which has the potential to result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees, and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could 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. Therefore, further analysis of this issue will be provided in the EIR. With respect to parking, parking impacts of the Project shall not be considered a significant impact on the environment pursuant to SB 743. However, the EIR will address code compliance with LAMC parking standards.

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

**Potentially Significant Impact.** Metro administers the Congestion Management Program (CMP), a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this issue will be provided in the 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.** The Project proposes a new 975-foot-tall, 66-story, high-rise building. The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. The nearest airport is LAX located approximately 11 miles southwest of the Project Site. Additionally, the Project would be required to comply with applicable Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures. Furthermore, the Project

would be required to comply with the notice requirements imposed by the FAA for all new buildings taller than 200 feet and would complete Form 7460-1 (Notice of Proposed Construction or Alteration). Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** The Project's design does not include hazardous design features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections due to design features. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by LADBS and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the Project would not introduce incompatible uses such as farm equipment to the Project Site. Therefore, no impacts associated with hazardous design features or incompatible uses would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. Specifically, the hotel entrance and residential uses would be accessed via proposed driveways on James M. Wood Boulevard and Figueroa Street. Vehicular access from the adjacent alley, Cottage Place, would also be provided. In addition, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.



- f. **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 Project Site is served by a variety of transit options including numerous bus routes and the 7th Street/Metro Center station. The development of the Project would also increase demand for alternative transportation modes in the vicinity of the Project Site. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

## **XVII. Tribal Cultural Resources**

- a. **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
  - i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**
  - 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.** Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations up to 50 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place,

cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City notified all applicable tribes on May 15, 2017, and the Project will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

## **XVIII. Utilities**

The following analysis is based, in part, on the Figueroa Centre Utility Infrastructure Report: Water, Wastewater, and Energy (Utility Report) prepared for the Project by KPFF Consulting Engineers dated March 24, 2017. All specific information in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-6 of this Initial Study.

*Would the project:*

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

**Less Than Significant Impact.** Wastewater collection and treatment services within the Project vicinity are provided by the City of Los Angeles Department of Public Works (LADPW). Wastewater generated during operation of the Project would be collected and discharged into the existing sewer mains in Figueroa Street and Cottage Place<sup>81</sup> and conveyed to the Hyperion Water Reclamation Plant (HWRP) located in Playa del Rey. The HWRP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles–Glendale Water Reclamation Plant (LAGWRP). The treatment capacity of the entire Hyperion Treatment System is approximately 550 million gallons per day (mgd) (consisting of 450 mgd at HTP, 80 mgd at TWRP, and 20 mgd at LAGWRP).<sup>82</sup> The HWRP is designed to treat 450 mgd, with annual increases in wastewater flows limited to 5 mgd by City Ordinance No. 166,060. The HWRP currently processes an average of 275 mgd on dry weather days, and therefore has an available capacity of approximately 175 mgd.<sup>83</sup>

The type of wastewater generated by the Project would be typical of commercial and residential uses. No industrial discharge into the wastewater system would occur. As the

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<sup>81</sup> Appendix IS-6, p. 7.

<sup>82</sup> City of Los Angeles Department of Public Works Bureau of Sanitation. *City of Los Angeles Integrated Resources Plan Executive Summary*, December 2006, [www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010394.pdf](http://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010394.pdf), accessed April 5, 2017.

<sup>83</sup> City of Los Angeles LA Sanitation, *Hyperion Water Reclamation Plant*, [www.lacitysan.org/san/faces/wcnav\\_externalld/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=g7xwthamm\\_334&\\_afrLoop=24819387318384454#!](http://www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=g7xwthamm_334&_afrLoop=24819387318384454#!), accessed April 5, 2017.

HWRP is in compliance with the State's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the RWQCB. Therefore, impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact.** Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Construction of the Project would result in an increased water demand and wastewater generation from the Project Site. With regard to water, the location, condition, and capacity of water conveyance lines will be evaluated in an EIR to determine whether adequate capacity is available to accommodate the required fire flows and domestic water demand generated by the Project.

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

Based on sewage generation factors established by LADPW Bureau of Engineering (BOE), the Project would generate an average of approximately 173,700 gallons per day (gpd) of wastewater. Currently, the existing parking lot generates an average of approximately 4,266 gpd. In total, when subtracting the current parking lot's wastewater flows, the Project would generate a net daily flow of 169,434 gpd. Table B-1 on page B-51 summarizes the Project Site sewer flows.

The City has approved the Sewer Capacity Availability Request for the Project, indicating the existing 8-inch sewer mains in Figueroa Street and Cottage Place would have adequate capacity to accommodate 100 percent of the additional demand generated by the Project.<sup>84</sup> The HWRP would also have adequate capacity to serve the Project. No upgrades to existing sewer mains would be required.

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<sup>84</sup> City of Los Angeles, Bureau of Engineering, Sewer Capacity Availability Request, April 25, 2016.

**Table B-1  
Estimated Project Wastewater Generation**

<b>Land Use</b>	<b>Units</b>	<b>Generation Rate<sup>a</sup> (gpd)</b>	<b>Total Wastewater Generation (gpd)</b>
<b>Existing (to be removed)</b>			
Parking Lot	85,317 sf	(0.05/sf)	4,266
<i>Subtotal Existing</i>			4,266
<b>Proposed</b>			
Hotel (Guest Rooms Only)	220	(120/rm)	26,400
Banquet Room/Ballroom	22,766 sf	(0.35/sf)	7,968
Retail Area	44,080 sf	(0.025/sf)	1,102
Restaurant: Full Service	50,000 sf <sup>b</sup>	(30/seat) <sup>b</sup>	99,990
Residential: 2-BR	66 du	(150/du)	9,900
Residential: 3-BR	66 du	(190/du)	12,540
Residential: 4-BR	66 du	(230/du)	15,180
Residential: 6-BR	2 du	(310/du)	620
<i>Subtotal Proposed</i>			173,700
<b>Total Project Site Wastewater Generation (Proposed)</b>			<b>173,700</b>
<b>Project Net Wastewater Generation (Proposed – Existing to be Removed)</b>			<b>169,434</b>
<p><i>du = dwelling units</i>  <i>gpd = gallons per day</i>  <i>rm = rooms</i>  <i>sf = square feet</i>  <sup>a</sup> Project wastewater generation was calculated using the City of Los Angeles Department of Public Works, Bureau of Engineering sewage generation factors.  <sup>b</sup> Assumes approximately 15 sf/seat.  Source: Eyestone Environmental and KPFF, April 2017.</p>			

Therefore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site, and would not 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. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact.** As discussed in detail in Response to Checklist Question IX.c, above, the Project would decrease the amount of impervious surfaces on the Project Site and would not increase stormwater flows. The Project Site is also in a highly urbanized, developed area within Downtown Los Angeles that already contains stormwater facilities including drainage. Furthermore, as described in detail in the Water Resources Report included as Appendix IS-5 to this Initial Study, the Project would provide appropriate on-site drainage improvements to control runoff, including the installation of catch basins, plant drains, and roof downspouts to collect roof and site runoff and direct stormwater away from the structures to existing underground storm drain pipes. Thus, the Project would not require the construction of new off-site stormwater drainage facilities or expansion of existing facilities. Impacts from the construction of stormwater facilities therefore would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Potentially Significant Impact.** LADWP supplies water to the Project Site. Given the Project's increase in the amount of developed floor area on the Project Site, the Project has to the potential to result in an increased demand for water provided by LADWP. Specifically, the Project would generate water demand greater than that required by a 500-dwelling-unit project. Therefore, a Water Supply Assessment is required to be prepared pursuant to SB 610. Therefore, further analysis of this issue will be provided in the EIR.

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

**Less Than Significant Impact.** As discussed in Response to Checklist Question XVII.a, above, the Project does not propose industrial uses and the HWRP is in compliance with the State's wastewater treatment requirements. Furthermore, as discussed in Response to Checklist Question XVII.b, the net daily wastewater flow of 169,434 gpd generated by the Project would not exceed the treatment capacity of the HWRP, which currently has 175 mgd in capacity available. Therefore, the Project would not result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant and no mitigation measures are required.

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

**Less Than Significant Impact.** While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.<sup>85</sup> Ten Class III landfills and one unclassified landfill with solid waste facility permits are currently operating within the County.<sup>86</sup> In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2015, the City of Los Angeles disposed of approximately 2.53 million tons of solid waste at the County's Class III landfills and approximately 39,364 tons at transformation facilities.<sup>87,88</sup> The 2.53 million tons of solid waste accounts for approximately 2.62 percent of the total remaining capacity (96.45 million tons) for the County's Class III landfills open to the City.<sup>89,90</sup>

The unclassified landfill serving the County is Azusa Land Reclamation. This facility currently has 57.56 million tons of remaining capacity and an average daily disposal rate of 846 tons per day.<sup>91</sup>

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<sup>85</sup> *Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.*

<sup>86</sup> *County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

<sup>87</sup> *These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.*

<sup>88</sup> *County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2016 to December 2016).*

<sup>89</sup>  $(2.53 \text{ million tons} \div 96.45 \text{ million tons}) \times 100 = 2.62 \text{ percent.}$

<sup>90</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016, Appendix E-2 Table 1.*

<sup>91</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.<sup>92</sup> Based on the most recent 2015 ColWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 114.37 million tons.<sup>93</sup>

Based on the 2015 ColWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2030 will not exceed the 2015 remaining permitted Class III landfill capacity of 114 million tons. The County therefore has disposal capacity beyond the Project's buildout year of 2023. Nonetheless, while there is no expected daily landfill capacity shortfall during the planning period, there are constraints that may limit the accessibility of Class III landfill capacity. These constraints include watershed boundaries, geographic barriers, weather, and natural disasters. Therefore, the Annual Report evaluated seven scenarios and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the scenarios. Only the scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.<sup>94</sup> The City of Los Angeles is currently diverting 76 percent of its waste from landfills.<sup>95</sup> The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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

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<sup>92</sup> County of Los Angeles, Department of Public Works. *Los Angeles County Integrated Waste Management Plan 2014 Annual Report*, December 2015.

<sup>93</sup> This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.

<sup>94</sup> City of Los Angeles, *Solid Waste Integrated Resource Plan FAQ*; [www.zerowaste.lacity.org/files/info/fact\\_sheet/SWIRPFAQS.pdf](http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf), accessed February 17, 2017.

<sup>95</sup> LA Sanitation, Recycling, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?\\_adf.ctrl-state=alxbkb91s\\_4&\\_afLoop=18850686489149411#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!), accessed February 17, 2017.

## Construction

The Project Site is currently developed as a surface parking lot. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table B-2 on page B-56, after accounting for mandatory recycling, the Project would result in approximately 1,022 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 57.56 million tons, as well as the remaining 96.45 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

## Operation

As discussed in Attachment A, Project Description, the Project includes a 355,272-square-foot hotel with meeting/event space and 220 guest rooms, up to 200 new residential condominium units, 44,080 square feet of retail uses, and 50,000 square feet of restaurants. As shown in Table B-3 on page B-57, upon full buildout under this scenario, the Project would generate approximately 9,368 pounds of solid waste per day. Projected out annually, this would result in approximately 1,710 tons per year of solid waste.<sup>96</sup> The Project Site is a surface parking lot under existing conditions, so any existing waste generation is considered negligible and is not factored into this figure. However, it is noted that the estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's upcoming Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.<sup>97</sup> The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.07 percent of the City's

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<sup>96</sup> 9,368 pounds per day x 365 days = 3,419,320 pounds per year; 3,419,320 pounds per year/2,000 pounds per ton = 1,710 tons per year

<sup>97</sup> The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlafr.jsessionid=nJABd\\_CcLHL4DCOkGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041!NONE?\\_afLoop=17071741526736871&\\_afWindowMode=0&\\_afWindowId=null#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D17071741526736871%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dge1mehnju\\_4](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlafr.jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afLoop=17071741526736871&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D17071741526736871%26_afWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4), accessed March 24, 2017.



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

<b>Building</b>	<b>Size</b>	<b>Generation Rate (lbs/sf)<sup>a</sup></b>	<b>Total (tons)</b>
<b>Existing</b>			
Parking	85,317 sf	48 <sup>b</sup>	2,041
<b><u>Subtotal for Demolition</u></b>			<b>2,041</b>
<b>Proposed</b>			
Multi-Family Residential (200 du)	535,588 sf	4.38	1,173
Hotel	355,272 sf	3.89	691
Retail	44,080 sf	3.89	86
Restaurant	50,000 sf	3.89	97
<b><u>Subtotal for Construction</u></b>			<b>2,047</b>
<b>Total Prior to Recycling</b>			<b>4,088</b>
<b>Total After 75-Percent Recycling</b>			<b>1,022</b>
<hr/> <i>du = dwelling unit</i> <i>lb = pound</i> <i>sf = square feet</i> <sup>a</sup> U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i> , June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types. <sup>b</sup> National Asphalt Pavement Association, <i>How to Determine Quantities</i> , <a href="http://www.asphaltpavement.org/index.php?option=com_content&amp;view=article&amp;id=144&amp;Itemid=330">www.asphaltpavement.org/index.php?option=com_content&amp;view=article&amp;id=144&amp;Itemid=330</a> , accessed May 19, 2017. Source: Eyestone Environmental, 2017.			

annual solid waste disposal<sup>98</sup> and approximately 0.002 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.<sup>99</sup>

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

<sup>98</sup> 1,710 tons per year/2.53 million tons per year = 0.07%

<sup>99</sup> 1,710 tons per year/96.45 million tons = 0.002%

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

<b>Building</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup></b>	<b>Total (lb/day)</b>
<b>Existing</b>			
Parking	85,317 sf	N/A	—
<b>Total Existing</b>			<b>—</b>
<b>Proposed</b>			
Multi-Family Residential	200 du	12.23 lb/du/day	2,446
Hotel	355,272 sf	10.53 lb/emp/day	4,223 <sup>b</sup>
Retail	44,080 sf	10.53 lb/emp/day	1,267 <sup>c</sup>
Restaurant	50,000 sf	10.53 lb/emp/day	1,432 <sup>d</sup>
<b>Total with Implementation of Project</b>			<b>9,368</b>
<b>Total Net Generation</b>			<b>9,368</b>
<p><i>du = dwelling unit</i>  <i>emp = employee</i>  <i>lb = pound</i>  <i>sf = square feet</i></p> <p><sup>a</sup> CalRecycle, <i>Estimated Solid Waste Generation Rates</i>, <a href="http://www2.calrecycle.ca.gov/Waste/Characterization/General/Rates">www2.calrecycle.ca.gov/Waste/Characterization/General/Rates</a>, accessed February 21, 2017.</p> <p><sup>b</sup> Los Angeles Unified School District, <i>2012 Developer Fee Justification Study</i>, February 9, 2012, Table 11. Based on the employee generation rates for “Lodging” (0.00113 employee per average square foot), the proposed 355,262-square foot hotel would result in 401 employees.</p> <p><sup>c</sup> Los Angeles Unified School District, <i>2012 Developer Fee Justification Study</i>, February 9, 2012, Table 11. Based on the employee generation rates for “Neighborhood Shopping Centers” (0.00271 employee per average square foot), the proposed 44,080 square feet of retail uses would result in 120 employees.</p> <p><sup>d</sup> Los Angeles Unified School District, <i>2012 Developer Fee Justification Study</i>, February 9, 2012, Table 11. Based on the employee generation rates for “Neighborhood Shopping Centers” (0.00271 employee per average square foot), the proposed 50,000 square feet of restaurant uses would result in 136 employees.</p> <p>Source: Eyestone Environmental, 2017.</p>			

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

**Less Than Significant Impact.** Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the

adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste<sup>100</sup> on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate 8 cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate 4 cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.<sup>101</sup> The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

- 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?**

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<sup>100</sup> *Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.*

<sup>101</sup> *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

**Potentially Significant Impact.** As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. However, the Project does have the potential to degrade the quality of the environment or eliminate important examples of prehistory. Therefore, further evaluation of this topic in an EIR is required.

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

**Potentially Significant Impact.** The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources; greenhouse gas emissions; land use and planning; noise; public services (fire protection, police protection, schools, parks, and other public services); recreation; transportation/circulation; tribal cultural resources; and utilities (water, and energy).

With regard to cumulative effects with respect to aesthetics, agricultural resources, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, and other utilities (i.e., solid waste), the Project’s incremental contribution to potential cumulative impacts would not be cumulatively considerable. Specifically, with respect to aesthetics, as discussed in Subsection I. Aesthetics, above, pursuant to SB 743, the Project’s impacts would not be significant. Furthermore, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Thus, and pursuant to SB 743, cumulative impacts associated with aesthetics would be less than significant.

With respect to agricultural resources and mineral resources, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. With respect to biological resources and hazardous materials, these resource areas are generally site-specific and would be evaluated within the context of each individual project. Regarding geology and hazards, the Project would not exacerbate existing environmental conditions. Furthermore, related projects would be required to comply with existing regulatory requirements and the City’s building permit review and

approval process, which address these subjects. In addition, with regard to hydrology, the Project would not increase peak flows during the 50-year storm events. Therefore, the Project would not contribute to a cumulative impact on downstream infrastructure.

With regard to population and housing, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed in the analysis above, the employment, housing and population generated by the Project would be well within SCAG growth forecasts.

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

With regard to solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above in Response to Checklist Question VIII.f, the estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.07 percent of the City's annual solid waste disposal and approximately 0.002 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles. As also previously discussed in Response to Checklist Question VIII.f, the demand for landfill capacity is continually evaluated by the County through preparation of the ColWMP annual reports. Each annual ColWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2015 ColWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2030), which is beyond the Project's buildout year (2023). The preparation of each annual ColWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030.

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

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

**Potentially Significant Impact.** Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; greenhouse gas emissions; land use and planning; noise; public services (fire protection, police protection, schools, parks, and other public services); recreation; transportation/circulation; tribal cultural resources; and utilities (water, and energy). As a result, these potential effects will be analyzed further in the EIR.